

Sustainability Appraisal (SA) of the Forest Heath Local Plan

Post-submission Interim SA Report
February 2018

| REVISION SCHEDULE | | | | | |
|-------------------|----------|--|-------------------------------------|-----------------------------------|-----------------------------------|
| Rev | Date | Details | Prepared by | Reviewed by | Approved by |
| 1 | Feb 2018 | Post-submission Interim SA Report dealing with alternative approaches to adjusting the submission Single Issue Review (SIR) spatial strategy | Mark Fessey Principal Consultant | Steve Smith Technical Director | Steve Smith Technical Director |

Limitations

AECOM Infrastructure & Environment UK Limited (AECOM) has prepared this Report for the sole use of Forest Heath District Council (“Client”) in accordance with the terms and conditions of appointment. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM. This Report may not be relied upon by any other party without the prior and express written agreement of AECOM.

Where any conclusions and recommendations contained in this Report are based upon information provided by others, it has been assumed that all relevant information has been provided by those parties and that such information is accurate. Any such information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in the Report.

AECOM Infrastructure & Environment UK Limited
 2 Leman Street, London E1 8FA
 Telephone: +44 (0)20 7798 5000

TABLE OF CONTENTS

| | | |
|----------|---|-----------|
| 1 | INTRODUCTION | 1 |
| 2 | WHAT'S THE SCOPE OF THE SA? | 2 |
| 3 | WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT? | 3 |
| 4 | WHAT ARE THE SA FINDINGS AT THIS STAGE? | 25 |
| 5 | WHAT ARE THE NEXT STEPS? | 39 |
| | APPENDIX I: MAP TERMINOLOGY..... | 40 |

1 INTRODUCTION

1.1 Background

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

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

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

1.1.3 The Council responded to the Inspectors on 19th January 2018 stating:

“The Council does want to have an adopted local plan and in the light of your letter officers intend to pursue Option A. Officers are therefore looking to propose to members increasing provision within one or more of the main towns and will also consider whether it is appropriate to reduce provision within the Key Service Centres.”

1.2 Sustainability Appraisal

1.2.1 The Local Plan is being developed alongside a process of Sustainability Appraisal (SA), a legally required process that aims to ensure that the significant effects of an emerging draft plan, and alternatives, are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the ‘SEA Regulations’) 2004.

1.2.2 The aim of **this Interim SA Report** is essentially to present an appraisal of alternative approaches to housing growth, or ‘spatial strategy alternatives’, in order to inform selection of a preferred approach to propose to members (see para 1.1.3).

N.B. this is an ‘interim’ report on the basis that it focuses on a specific matter – namely the appraisal of spatial strategy alternatives – as opposed to the plan as a whole (the remit of the SA Report) or Proposed Modifications (the remit of SA Report Addenda).

1.2.3 This Interim SA Report sets out to answer four questions:

1. What’s the scope of the SA?
2. What has plan-making / SA involved up to this point?
3. What are the SA findings at this stage?
4. What happens next?

¹ The three Towns that form the top tier of the Forest Heath settlement hierarchy are: Brandon, Mildenhall and Newmarket.

² The two Key Service Centres that for the second tier of the Forest Heath settlement hierarchy are: Lakenheath and Red Lodge.

2 WHAT’S THE SCOPE OF THE SA?

2.1.1 The scope of SA work, with respect to the Forest Heath Local Plan, is introduced within the SA Report submitted alongside the Local Plan in March 2017. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological ‘framework’ for appraisal. The SA objectives are listed below in **Table 2.1**.

Table 2.1: The SA framework

| Topic | Objective | Would the proposal...? |
|--------------------|---|---|
| Housing | S1: Meet the housing needs of the whole community | <ul style="list-style-type: none"> • Increase access to good quality housing • Increase supply of affordable housing • Encourage regeneration and re-use of empty homes |
| Crime | S2: Minimise crime and antisocial behaviour, and fear of them | <ul style="list-style-type: none"> • Promote places that are, and feel, safe and secure • Reduce the potential for crime or anti-social behaviour. |
| Education | S3: Increase local education, training and employment opportunities especially for young people | <ul style="list-style-type: none"> • Provide training and learning opportunities |
| Health | S4: Improve the health of the people of Forest Heath | <ul style="list-style-type: none"> • Encourage provision of necessary healthcare services • Encourage healthy lifestyles |
| Sports and leisure | S5: Facilitate sports and leisure opportunities for all | <ul style="list-style-type: none"> • Encourage a wide range of sporting and non-sporting physical recreation opportunities • Increase access to facilities |
| Poverty | S6: Reduce social deprivation and poverty and in particular child poverty | <ul style="list-style-type: none"> • Encourage community cohesion to foster support networks • Encourage opportunities for education, training and skills for people in poverty |
| Noise | EN1: Minimise exposure to noise pollution | <ul style="list-style-type: none"> • Direct residential development towards those locations not affected by chronic noise pollution • Protect residents from noise • Locate and design infrastructure to minimise noise generation and exposure |
| Air quality | EN2: Improve air quality in the District especially in the Newmarket AQMA | <ul style="list-style-type: none"> • Directly or indirectly negatively impact air quality in the centre of Newmarket • Improve air quality in the District |
| Water | EN3: Maintain good water quality EN6: Reduce and minimise pressures on water resources | <ul style="list-style-type: none"> • Maintain and improve water quality • Maintain and improve barriers between pollution sources and water receptors • Direct development to where access is available to appropriate volumes of water without compromising the needs of others or the environment • Increase use of water efficiency technology |
| Land | EN4: Maintain and enhance the quality of land and soils | <ul style="list-style-type: none"> • Avoid development in contaminated areas • Remediate contaminated land • Minimise the loss of high quality agricultural land* |

| Topic | Objective | Would the proposal...? |
|---------------------------|---|---|
| Flooding | EN5: Reduce flood risk to people, property and infrastructure | <ul style="list-style-type: none"> • Avoid placing development in inappropriate locations • Increase the use of SUDS • Encourage development design that reduces flood risk |
| Climate change resilience | EN7: Make Forest Heath resilient to forecast impacts of climate change | <ul style="list-style-type: none"> • Incorporate resilience into the built environment • Encourage economic activities and patterns of life likely to be more resilient to climate change |
| Renewable energy | EN8: Make Forest Heath resilient to forecast impacts of climate change | <ul style="list-style-type: none"> • Encourage low carbon infrastructure • Encourage installation of renewable energy capacity • Encourage energy efficiency and measures to reduce energy consumption |
| Biodiversity | EN9: Protect and enhance the District's biodiversity, particularly where protected at international, national, regional or local level. | <ul style="list-style-type: none"> • Design-in space for biodiversity • Direct development away from sensitive locations • Minimise loss of biodiversity, and offset unavoidable losses like for like |
| Greenspace | EN10: Maximise residents' access to natural areas. | <ul style="list-style-type: none"> • Increase access to natural greenspaces • Deliver development that maintains and improves access to greenspace |
| Built environment | EN11: Maintain and enhance the quality of the built environment | <ul style="list-style-type: none"> • Encourage development that is architecturally complementary to existing townscapes and incorporates sustainable design principles • Encourage vibrant town centres that include retail as well as other uses • Encourage development that maintains tourism opportunities and improves the tourist offering |
| Landscape | EN12: Maintain and enhance the landscape character of the District | <ul style="list-style-type: none"> • Locate and design development to avoid compromising landscape character • Locate and design development to enhance previously degraded landscapes |
| Transport | EN13: Reduce car use and car dependency | <ul style="list-style-type: none"> • Locate development where sustainable transport is viable • Design development to encourage alternatives to private car use • Encourage walking and cycling |
| Waste | EN14: Reduce waste and manage waste sustainably | <ul style="list-style-type: none"> • Reduce the creation of waste • Deliver sustainable waste management |
| Historic environment | EN15: Conserve and enhance the historic environment, heritage assets and their settings | <ul style="list-style-type: none"> • Improve the quality of the historic environment • Respect, maintain and strengthen local character and distinctiveness |
| Unemployment | EC1: Reduce the levels of unemployment within the District | <ul style="list-style-type: none"> • Deliver development that increases employment opportunities • Deliver diverse economic opportunities in the District • Provide jobs for all residents, especially the less qualified |

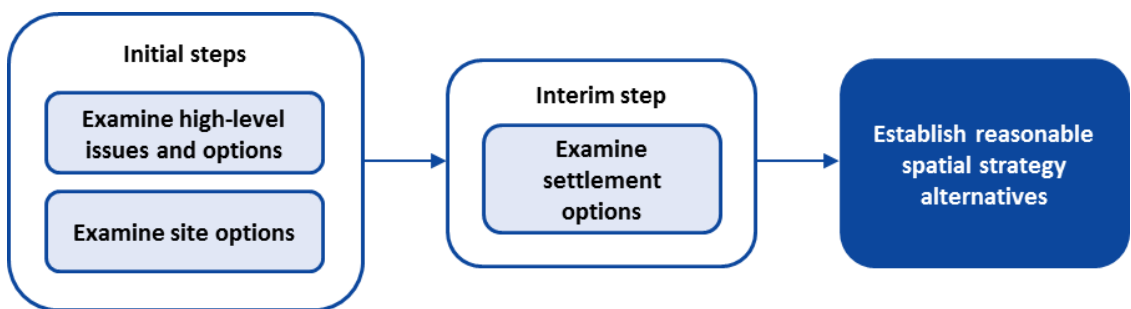
3 WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

3.1 Introduction

3.1.1 The aim here is to explain the work undertaken in January and early February 2018 to establish reasonable spatial strategy alternatives, i.e. alternative approaches to adjusting the submission SIR spatial strategy in order to respond to the Inspectors’ soundness concerns.

3.1.2 As summarised in **Figure 3.1**, work involved: **1)** examining high-level issues/options (e.g. the guidance provided by the Inspectors’ letter of 10th January); **2)** examining site options (i.e. the sites available to potentially deliver additional growth at Towns, and potentially facilitate reduced growth at Key Service Centres); **3)** giving more detailed consideration to the options for increased/reduced growth at specific settlements identified through the preceding analysis; and then **4)** drawing upon this analysis to identify reasonable spatial strategy alternatives.

Figure 3.1: Establishing reasonable spatial strategy alternatives



3.2 High-level issues and options

Introduction

3.2.1 The first step in the process of arriving at reasonable spatial strategy alternatives involved examining high-level (or ‘strategic’) issues and options. This section gives consideration to -

- the context in which the SIR has been prepared;
- the views of the Inspectors, as understood from their letter; and
- issues/options reported in the SIR SA Report.

The context for the SIR

3.2.2 The SIR is focused on two matters: overall housing provision and the distribution of that housing to settlements within the district. The SALP then carries forward the spatial strategy set by the SIR by making site allocations sufficient to deliver the scale of housing (and other) development that is needed. The SIR identifies an overall housing requirement for at least 6,800 dwellings over the period 2011-2031, based on up to date evidence to establish the Council’s Objectively Assessed Housing Need (OAHN), in line with the NPPF. The NPPF expects a local plan to identify the OAHN and meet it in full, unless to do so would conflict with other policy objectives of the NPPF. The NPPF also expects a local planning authority to be able to show a 5 year housing land supply (5YHLS) throughout the plan period.

- 3.2.3 The SIR sets out a distribution of the overall housing provision in Policy CS7. The provision is 6,877 dwellings, which closely reflects the OAHN. Part of the provision has already been provided in the period since 2011. Part of the provision already has planning permission, and the balance will be achieved by new allocations in the SALP plus an allowance for windfall sites. When allowance is made for what is already completed or committed, the latest assessment (as at March 2017) is that the housing provision will deliver some 7036 dwellings, broadly in line with the OAHN. The modest surplus (some 3%) is not considered to be significant or objectionable in policy terms. The Council regularly monitors its 5YHLS and is currently able to demonstrate that it has a 5YHLS, utilising contributions from those sites allocated within the SALP which are expected to deliver housing completions in the current five year period (2017-2022), as set out in the Council's published housing trajectory.
- 3.2.4 The Inspectors have not expressed concerns about the identified OAHN 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 OAHN, 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.
- [The Inspectors' letter](#)
- 3.2.5 The discussion of distribution issues/options begins by introducing the settlement hierarchy (see **Figure 3.2**, below) and summarising the distribution strategy reflected in the submission SIR. The Inspectors present a table demonstrating that *"the three Towns are expected to receive rather less new housing than that apportioned to the two Key Service Centres."* Specifically, the Inspectors' table shows that the three Towns will accommodate 34% of the overall growth proposed by the SIR and the two Key Service Centres will accommodate 39%. The Inspectors' concern is that:
- "In short, this distribution places too few homes in the most sustainable places and too many in less sustainable settlements. In our judgement, in this regard the SIR does not do enough to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling. Neither does it adequately focus significant development in locations which are suitably sustainable or can be made so, notwithstanding the existing and proposed facilities in Lakenheath and Red Lodge."*
- 3.2.6 The next section of the Inspectors' letter focuses on the matter of housing growth at Newmarket. There is no equivalent discussion of other settlements;³ hence the clear implication is that the Inspectors feel that Newmarket should receive additional growth, in order to address the imbalance between Towns and Key Service Centres discussed above.
- 3.2.7 With regards to Newmarket, the Inspectors highlight the decision taken subsequent to the 2016 Preferred Options consultation to reduce the quantum of proposed growth by 400 homes. The Inspectors correctly identify that this decision largely reflected the SoS's decision (August 2016) to refuse permission for 400 dwellings at Hatchfield Farm in Newmarket. This is a large site, which featured as part of the April 2016 preferred option, but which was then removed from the strategy in light of the SoS's decision. The Inspectors question the degree of weight placed on the SoS's decision, stating -

³ Mildenhall is not discussed within the Inspectors' letter, whilst Brandon is mentioned just once, with the Inspectors stating: "We recognise the constraints of the Breckland Special Protection Area in relation to Brandon."

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

3.2.8 The Inspectors recognise the analysis completed in order to inform the decision regarding the reduced growth quantum at Newmarket (as reported in the SIR SA Report, 2017), but question certain assumptions made. In particular, the Inspectors question the assumption that a spatial strategy option involving higher growth at Newmarket through allocation of Hatchfield Farm would lead to reduced traffic at a sensitive horse crossing (Rayes Lane) and in turn reduced concerns regarding the impacts of housing growth on the horseracing industry. The Inspectors state: *“So far as we can see, there is no evidence to suggest that including this site in preference to others would inevitably result in more traffic at the crossing than excluding it. It seems to us that much depends on the distribution overall.”* The Inspectors also note *“the Council’s view that mitigation requirements to ensure the safety of pedestrians, horses and riders at the crossings can be secured through relevant planning applications, and that it is most appropriate to deal with the issue through ‘development management’ policy.”*

3.2.9 The Inspectors’ letter concludes by stating -

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

Figure 3.2: The Forest Heath settlement hierarchy

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

N.B Sustainable Military Settlements are not included

The SIR SA Report (January 2017)

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

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

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

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

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

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

Other conclusions of the appraisal are as follows –

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

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

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

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

Conclusions regarding strategic issues/options

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

3.3 Site options

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

3.3.2 This section examines site options at Towns (Brandon, Mildenhall and Newmarket) and Key Service Centres (Lakenheath and Red Lodge) in turn.

Brandon

3.3.3 The SALP allocates just two small sites within the existing settlement boundary: SA2(a), 23 homes; and SA2(b), 10 homes. This approach reflects the constraints to growth that exist, as discussed within the SALP and the SA Report, and summarised above at para 3.2.8. Also see **Figure 3.2**, below.

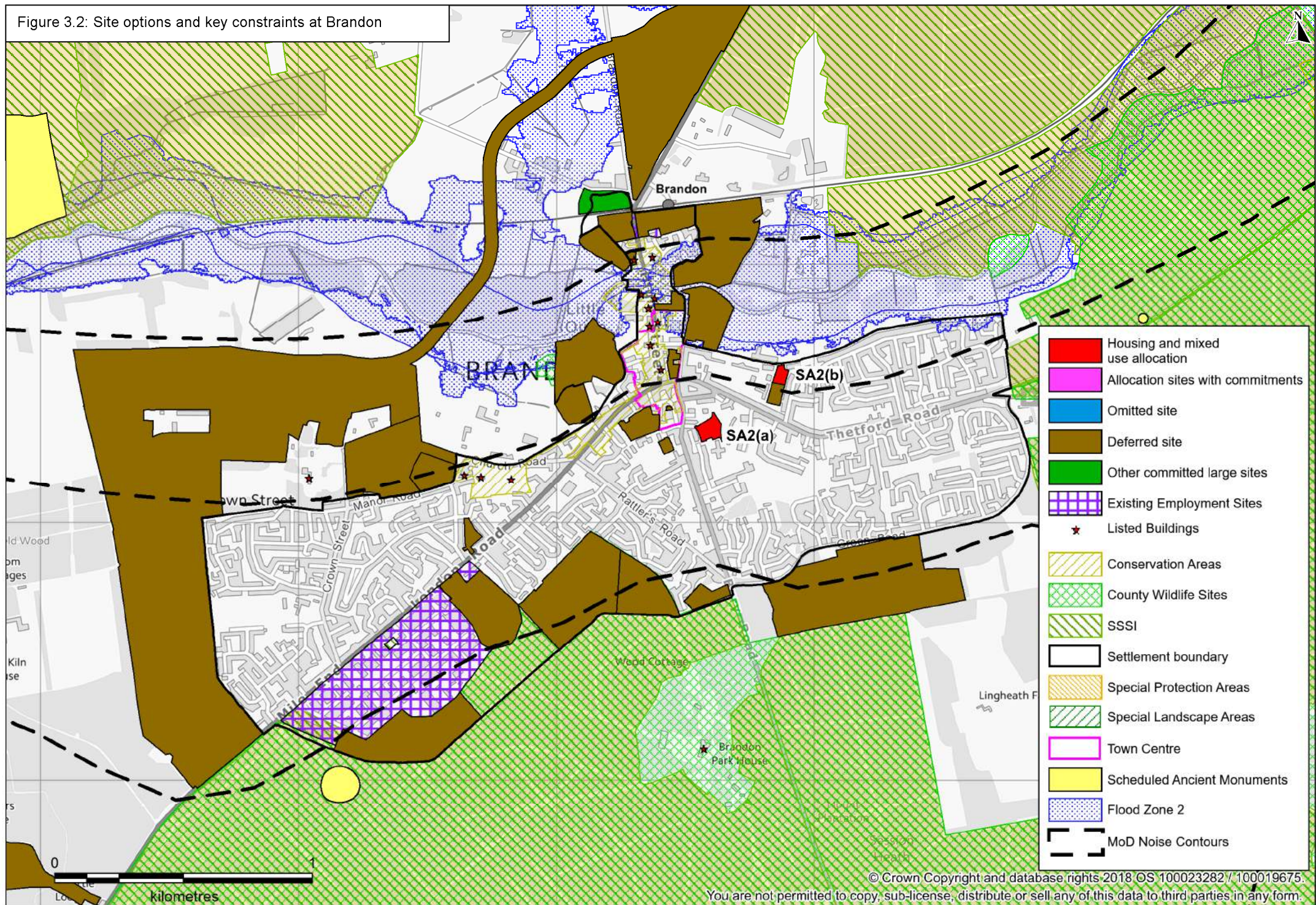
N.B. an explanation of the terminology included in the legend to Figure 3.2, and subsequent Figures 3.3 to 3.5, is included as **Appendix I**.

3.3.4 All omission sites are constrained by proximity to the Breckland SPA, with there being no development opportunity beyond c.1km of the SPA. This is reflected in all site options being assigned a 'red' score against criterion 17 'SPA' within SALP SA Report (see pgs. 11 and 12 of the Erratum, Jan 2017). The Council's Omission Sites document (November 2016) explains that all omission sites were 'deferred from consideration' through the Strategic Housing Land Availability Assessment (SHLAA), which essentially means that they were screened-out of consideration at a relatively early stage in the plan-making process. All sites within the settlement boundary, which are naturally less constrained in SPA terms, are subject to issues/constraints, e.g. B/06 Land off School Lane is a 1.2 ha site comprising important open space and a private garden with mature vegetation within the conservation area.

3.3.5 Focusing on the two allocated sites, there is not thought to be any potential to increase the site yield. Neither site can be expanded; and the proposed density of both sites is in excess of 30 dwellings per hectare (dph) before taking account of any onsite constraints that limit the developable area. The SALP also explains that access constraints to SA2(b) limit the number of homes that can be delivered.

3.3.6 In conclusion, there are no 'stand-out' sites at Brandon, and hence, given limited strategic reasons to consider higher growth (see Section 3.2), it is possible to screen-out the possibility of supporting higher growth.

Figure 3.2: Site options and key constraints at Brandon

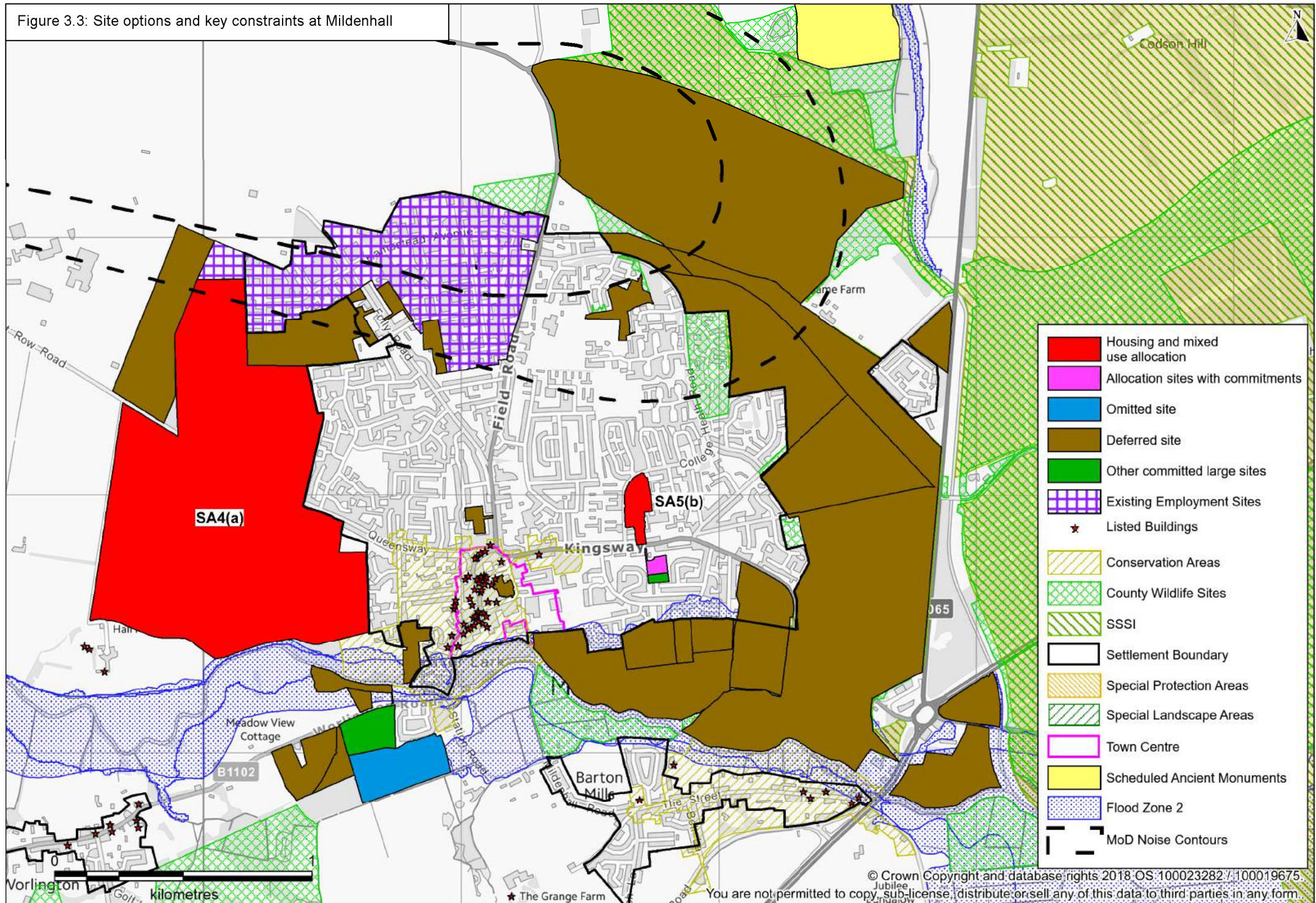


Mildenhall

- 3.3.7 The SALP allocates one large site to the west of Mildenhall - SA4(a), 1,300 homes - and two smaller sites within the existing settlement boundary: SA5(a), 23 homes; and SA5(b), 89 homes. There are constraints to growth at Mildenhall that limit the potential for additional expansion, as explained within the SALP and the SA Report (also see **Figure 3.3**, below). Notably, the SALP explains that: Breckland SPA restricts growth to the east; there are capacity constraints at the Fiveways A11/A1101/A1065 roundabout; there are aircraft noise constraint zones to the north of the town associated with RAF Mildenhall that control/influence building design; and land to the south lies within the floodplain of the River Lark.
- 3.3.8 The analysis of site options presented within the SALP SA Report (see pgs. 14 and 15 of the Erratum, Jan 2017) shows all sites to be subject to constraint in respect of one or more of the SA criteria, and does not serve to highlight any 'stand-out' sites. The Council's Omission Sites document (November 2016) identifies one 'omitted site' - M/30 The Old Railway - which is deemed to warrant detailed consideration. This is a 6.2 ha site to the south of the town, separated from the main urban area by the River Lark. It lies to the south of a recently completed housing site and a committed housing site (with a combined area of c. 5.5 ha), and the concern is that additional development in this area would lead to landscape impacts, and in particular impact on the settlement gap between Mildenhall and Barton Mills.
- 3.3.9 Focusing on the three allocated sites, there is not thought to be any potential to increase the site yield. Specifically -
- SA4(a) - the appropriate mix of uses at this strategic site has been given close attention over several years, including through the Mildenhall Hub project, which the SALP describes as *"an ambitious partnership initiative to rationalise and improve the public estate in Mildenhall for the benefit of local people. The proposed project includes relocating/replacing a variety of public buildings, currently split across five separate sites within Mildenhall, to one location on the western side of the town."* In total, the proposal is to deliver 5 ha of this 97 ha site for employment, community and leisure uses, and the option of reducing this 5 ha figure is considered unreasonable. Neither is there considered to be potential to increase the yield of the remaining 92 ha of the site, given: A) an identified need for landscape buffers to address constraints (e.g. the nearby cluster of listed buildings); B) an identified opportunity to deliver green infrastructure in the form of a 'blue green corridor' at the southern edge of the site; and C) a need to retain flexibility in respect of Suitable Alternative Natural Greenspace (SANG) delivery.⁴ There is feasibly the option to expand the site further north, taking in all or part of M33; however, this site was withdrawn in a Statement of Common Ground with SCC dated 19th Sept 2017. This confirmed the existing site allocation SA4(a) can accommodate the proposed 1300 dwellings, however there would be deliverability and highway capacity constraints to any further expansion of the site within the plan period.
 - SA5(a) - the proposed density of this site is in excess of 30 dph before taking account of onsite constraints that limit the developable area. The site is tightly bounded, and officers have confirmed that there is no potential to increase the density of housing, with part of the site having acquired planning permission for five homes.
 - SA5(b) - this is the site of the council offices, surgery and library that will become available with the delivery of the Mildenhall Hub project. The site is bound by College Heath Road to the north and west and existing residential development to the east. The site is potentially suitable for apartments and therefore a relatively high density of 44 dph is proposed. Officers have confirmed that there is no potential to increase the density of housing.
- 3.3.10 In conclusion, there are no 'stand-out' sites at Mildenhall, and hence, given limited strategic reasons to consider higher growth (see Section 3.2), it is possible to screen-out the possibility of supporting higher growth.

⁴ The SALP policy states: *"Measures should include the provision of [SANGS] of at least 10ha in size which is well connected"*

Figure 3.3: Site options and key constraints at Mildenhall



Newmarket

- 3.3.11 The SALP allocates six smaller sites at Newmarket - SA6(a), 87 homes; SA6(b), 'TBC' homes; SA6(c), 117 homes; SA6(d), 50 homes; SA6(e), 21 homes; and SA6(f), 46 homes. This equates to a low growth strategy, recognising that Newmarket is the District's largest town; however, the approach does reflect the constraints to growth that exist, including the horseracing industry, which can be considered a constraint as the industry is sensitive to increases in car traffic (particularly at horse crossings), as explained in the SALP and the SA Report. **Figure 3.4** shows certain other constraints to growth.
- 3.3.12 The analysis of site options presented within the SALP SA Report (see pg. 16 of the Erratum, Jan 2017) shows most sites to be subject to limited constraints, relative to sites at Brandon and Mildenhall, mainly reflecting the fact that parts of Newmarket are *relatively* unconstrained in biodiversity terms.⁵ A number of sites are assigned a 'red' score only in terms of the 'proximity to a train station' criterion. Newmarket train station is located to the south of the town, on the southern edge of the conservation area, 1 to 4km from the majority of sites, including the larger site options, which are found to the north of the town.
- 3.3.13 The Council's Omission Sites document (November 2016) identifies one 'omitted site' - N/14 Hatchfield Farm - which is deemed to warrant detailed consideration. This is a 66 ha site to the north of the town, stretching as far as the A14 (which acts a bypass to the town). To the west is Newmarket Business Park, and a large 20thC residential estate - Studlands Park - which is notably distant and separated from the main urban area of Newmarket (although there is a walking/cycling route). To the south is an area of open countryside, c.400m wide, separating the site from Newmarket's main urban area.
- 3.3.14 There is a current outstanding appeal for 400 homes, but a previous application was for 1,200 homes plus 5ha employment land. The site has a long planning history, culminating in a decision by the SoS to refuse permission for the 400 home scheme in August 2016, and then a subsequent quashing of that decision by the High Court (May 2017). It is now for the Secretary of State to reissue the appeal decision, and he has recently sought representations on certain matters ahead of deciding whether to reopen the inquiry. In respect of how the site has been considered through the Local Plan and SA process -
- Further Issues and Options (2015) - an option to "potentially deliver 1074 dwellings at 30 dwellings per hectare over 60% of the site area (after the 5 hectares employment land allocation, as identified within the context of the Core Strategy, has been removed...)"
 - Preferred Options (2016) - a preferred option for 400 homes plus 5ha employment land and a 1.5ha school site. Also examined within the two Interim SA Reports through the appraisal of: the draft plan; site options (SALP report); and spatial strategy alternatives (SIR report).
 - Submission (2017) - an omission site but examined within the two SA Reports through the appraisal of site options (SALP report) and spatial strategy alternatives (SIR report).
- 3.3.15 The Omission Sites document identifies other sites as 'deferred from consideration' through the SHLAA. However, given the strategic context (see Section 3.2) there is a need to re-examine all omission sites at the current time - see **Box 3.1**. Also, there is a need to check for opportunities to increase the yield at one or more of the submission allocations - see **Box 3.2**.
- 3.3.16 In conclusion, on the basis of the strategic context (Section 3.2), the Hatchfield Farm discussion presented above, 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.

⁵ Breckland SPA is over 7km distant; Chippenham Fen and Snailwell Poor's Fen SAC is c.2km distant, and SSSIs / LWSs are adjacent.

Box 3.1: Newmarket omission sites

Aside from N/14 Hatchfield Farm, the other omission sites that might potentially form a strategic extension to the existing settlement boundary are adjacent sites N/09 and N/21. However, any such option is unreasonable for the reasons set out in the Omission Sites document: **N/09** is in active equine use, and hence development would be contrary to policy; whilst **N/21** is currently open space and also in equine use.

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

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

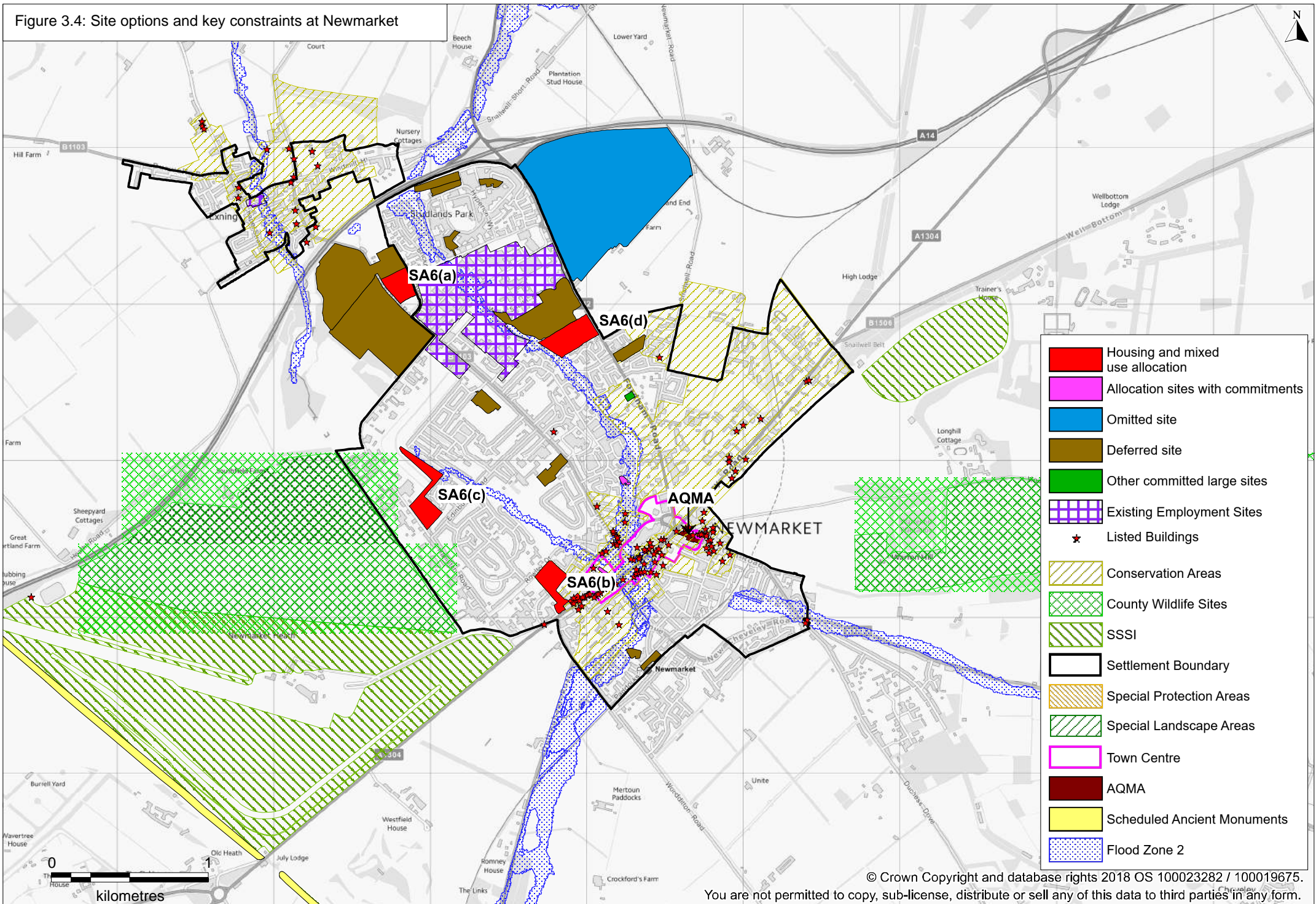
The remaining omission sites are: N/12, N/15 and three sites without a SHLAA reference number (Land north of Hyperion Way Studland (Part of N/08); Land at Studlands Park, Parkers Walk; and Land south of Aureole Walk, Studlands Park). All are unreasonable options for the reasons set out in the Omission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

Box 3.2: Newmarket submission allocations

Sites are examined in size order -

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

Figure 3.4: Site options and key constraints at Newmarket



Lakenheath

- 3.3.17 The SALP allocates six sites at Lakenheath, including a cluster of sites to the north of the village, for a total of 841 homes. Specifically, the SALP allocates the following six sites -
- SA7(a) - 13 homes
 - SA7(b) - 140 homes
 - SA8(a) - 81 homes
 - SA8(b) - 375 homes
 - SA8(c) - 67 homes
 - SA8(d) - 165 homes
- 3.3.18 This equates to a high growth strategy, reflecting the availability of relatively unconstrained sites, and the potential to achieve certain benefits through a strategic focus of growth to the north of the village. The approach was proposed mindful of Lakenheath's position in the settlement hierarchy, and the constraints to growth that exist - see **Figure 3.5**. One issue that is not depicted on the constraints map relates to the planned intensification of operational uses on RAF Lakenheath, which is likely to have infrastructure and noise implications for the area.
- 3.3.19 The analysis of site options presented within the SALP SA Report (see pg. 13 of the Erratum, Jan 2017) serves to enable some distinction between the proposed allocations, for example highlighting that some are more constrained than others in terms of: flood risk, noise, proximity to a SSSI and proximity to heritage assets.
- 3.3.20 However, the table presented on page 13 of the SALP SA Report also served to highlight five of the six sites as having planning permission, or a resolution to grant planning permission,⁶ either on all or part of the site. The latest situation - see **Table 3.1** - is that one site has full planning permission, whilst four others have a resolution to grant planning permission (for the site as a whole).
- 3.3.21 Dealing firstly with the four sites with a resolution to grant planning permission, the conclusion is reached that none is a 'reasonable option' for deallocation, or a reduction in yield, for the following reasons - see discussion within **Box 3.3**. One of the four sites - SA7(b) - stands-out as potentially having greatest constraint, and least merit, in planning and sustainability terms; however, it is set to deliver housing within the first five years of the plan period, and so allocation of this site is deemed to be of importance from a perspective of demonstrating (to the Inspectors) and maintaining a five year housing land supply. The option of allocating the site for a reduced number of homes is similarly not supported on five year housing land supply grounds. There would be a need to revisit the planning application, leading to delay.
- 3.3.22 The one site without either planning permission or a resolution to grant planning permission is SA8(d) – Land North of Burrow Drive and Briscoe Way - which comprises the western part of the cluster to the north of the village. This site would naturally come forward subsequent to SA8(b) and SA8(c), which it relies on for access, and as such the Council's housing trajectory shows that it is not expected to yield any completions until 2026/27. On this basis it can be considered as an option to explore further, either for deallocation or allocation for a reduced number of homes without jeopardising the 5YHLS.
- 3.3.23 In conclusion, there is only one submission allocation at Lakenheath - SA8 (d) - that might be deallocated or deliver a reduced number of homes. This site is considered further within Section 3.4.

⁶ i.e. a resolution to grant planning permission subject to reaching legal (Section 106) agreements on infrastructure provision.

Table 3.1: Planning application status of Lakenheath allocations

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

Box 3.3: Sites at Lakenheath with a resolution to grant planning permission

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

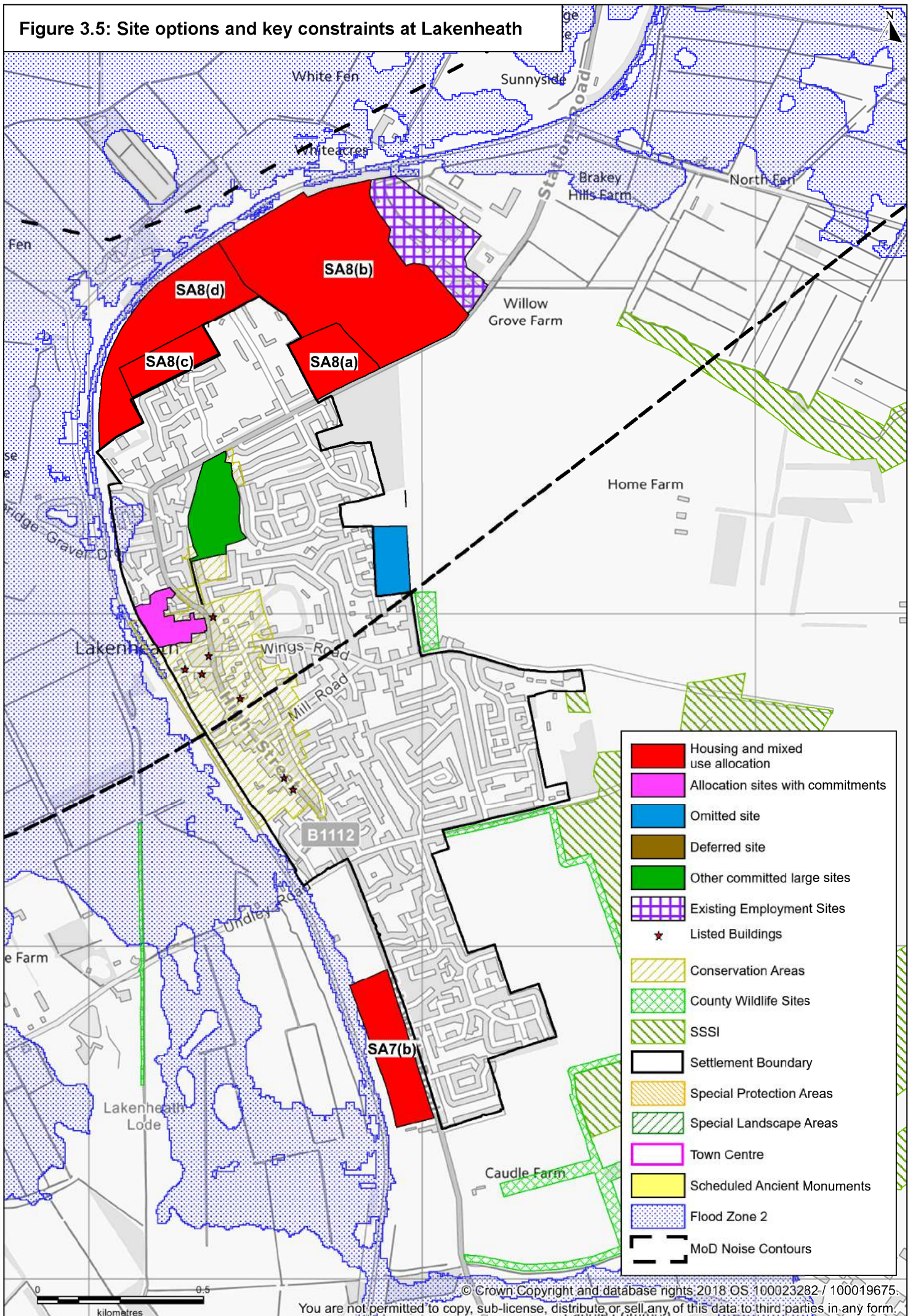
There are a number of points to make regarding these sites -

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

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

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

Figure 3.5: Site options and key constraints at Lakenheath



- Housing and mixed use allocation
- Allocation sites with commitments
- Omitted site
- Deferred site
- Other committed large sites
- Existing Employment Sites
- Listed Buildings
- Conservation Areas
- County Wildlife Sites
- SSSI
- Settlement Boundary
- Special Protection Areas
- Special Landscape Areas
- Town Centre
- Scheduled Ancient Monuments
- Flood Zone 2
- MoD Noise Contours

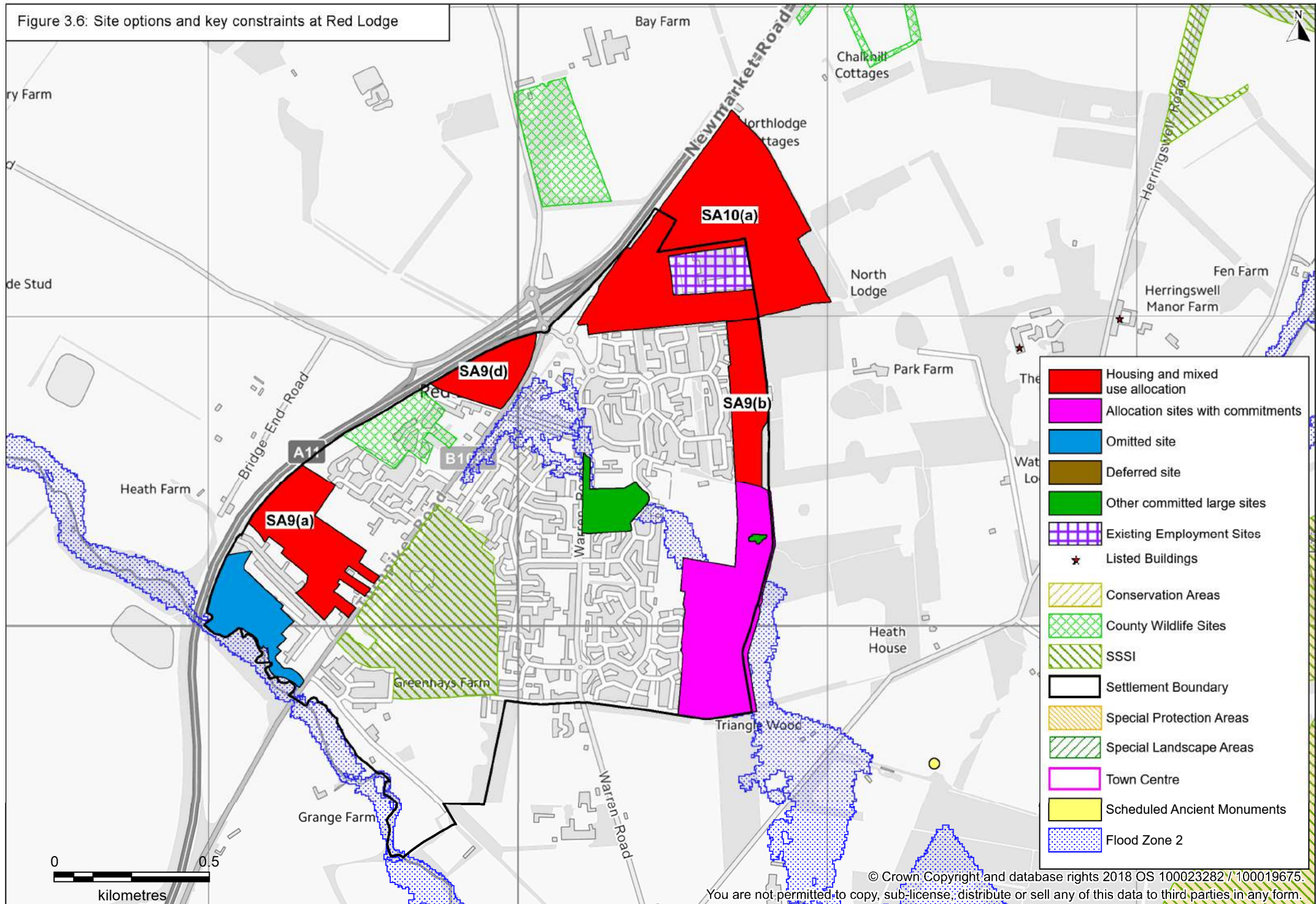
Red Lodge

- 3.3.24 The SALP allocates five sites at Red Lodge, for a total of 1,129 homes. Specifically, the SALP allocates -
- SA9(a) - 132 homes
 - SA9(b) - 140 homes
 - SA9(c) - 382 homes
 - SA9(d) - 125 homes
 - SA10(a) - 350 homes
- 3.3.25 This equates to a high growth strategy, reflecting the availability of relatively unconstrained sites, and the potential to achieve certain benefits through a strategic focus of growth to the north of the village. The approach was proposed mindful of Red Lodge’s position in the settlement hierarchy, and the constraints to growth that exist - see **Figure 3.6**. One issue that is not depicted on the constraints map relates to recent growth at Red Lodge, with the village having expanded at a considerable rate over recent decades.
- 3.3.26 The analysis of site options presented within the SALP SA Report (see pg. 17 of the Erratum, Jan 2017) serves to enable some distinction between the proposed allocations, notably in respect of biodiversity/ecology constraints, and also landscape/heritage constraint.
- 3.3.27 However, there are a range of other considerations. **Table 3.2** considers each of the proposed allocations in turn. The conclusion is reached that one site - SA10(a) Focus of growth at North Red Lodge - is potentially suitable for deallocation or allocation for a reduced number of homes. This site is considered further within Section 3.4.

Table 3.2: Planning application status of Red Lodge allocations

| Site | Planning application status | Commentary |
|--|---|--|
| SA9(a) Land off Turnpike Road and Coopers Yard | An application for 55 homes is pending on part of the site. | The site is part brownfield and lies within the settlement boundary of the 1995 Local Plan. Policy SA9 states that a development brief will be required. The site is in multiple ownership and there are concerns that without a development brief the site will come forward in an unsustainable and piecemeal fashion. For these reasons it is not considered appropriate to reduce the yield or deallocate. |
| SA9(b) Land east of Red Lodge (north) | An application is anticipated in Spring 2018. | The site lies within the settlement boundary and is designated for housing in the Red Lodge masterplan. This site is seen as a natural extension to SA9(c). Also, this site is expected to deliver housing in the first five years post adoption (albeit only in year 5), which means that it is of importance from a five year housing land supply perspective. For these reasons it is not considered appropriate to reduce the yield or deallocate. |
| SA9 (c) Red Lodge east (south) & SA9 (d) Land west of Newmarket Rd and North Elms Rd | Full planning permission; hence no potential to reduce the site capacity or deallocate / remove from the Local Plan land supply | |
| SA10(a) Focus of growth – North RL | No planning application; hence potential to reduce the site capacity or deallocate | |

Figure 3.6: Site options and key constraints at Red Lodge



- Housing and mixed use allocation
- Allocation sites with commitments
- Omitted site
- Deferred site
- Other committed large sites
- Existing Employment Sites
- ★ Listed Buildings
- Conservation Areas
- County Wildlife Sites
- SSSI
- Settlement Boundary
- Special Protection Areas
- Special Landscape Areas
- Town Centre
- Scheduled Ancient Monuments
- Flood Zone 2

0 0.5
kilometres

3.4 Settlement options

Introduction

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

Newmarket

3.4.2 There are two sites in contention to deliver additional housing -

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

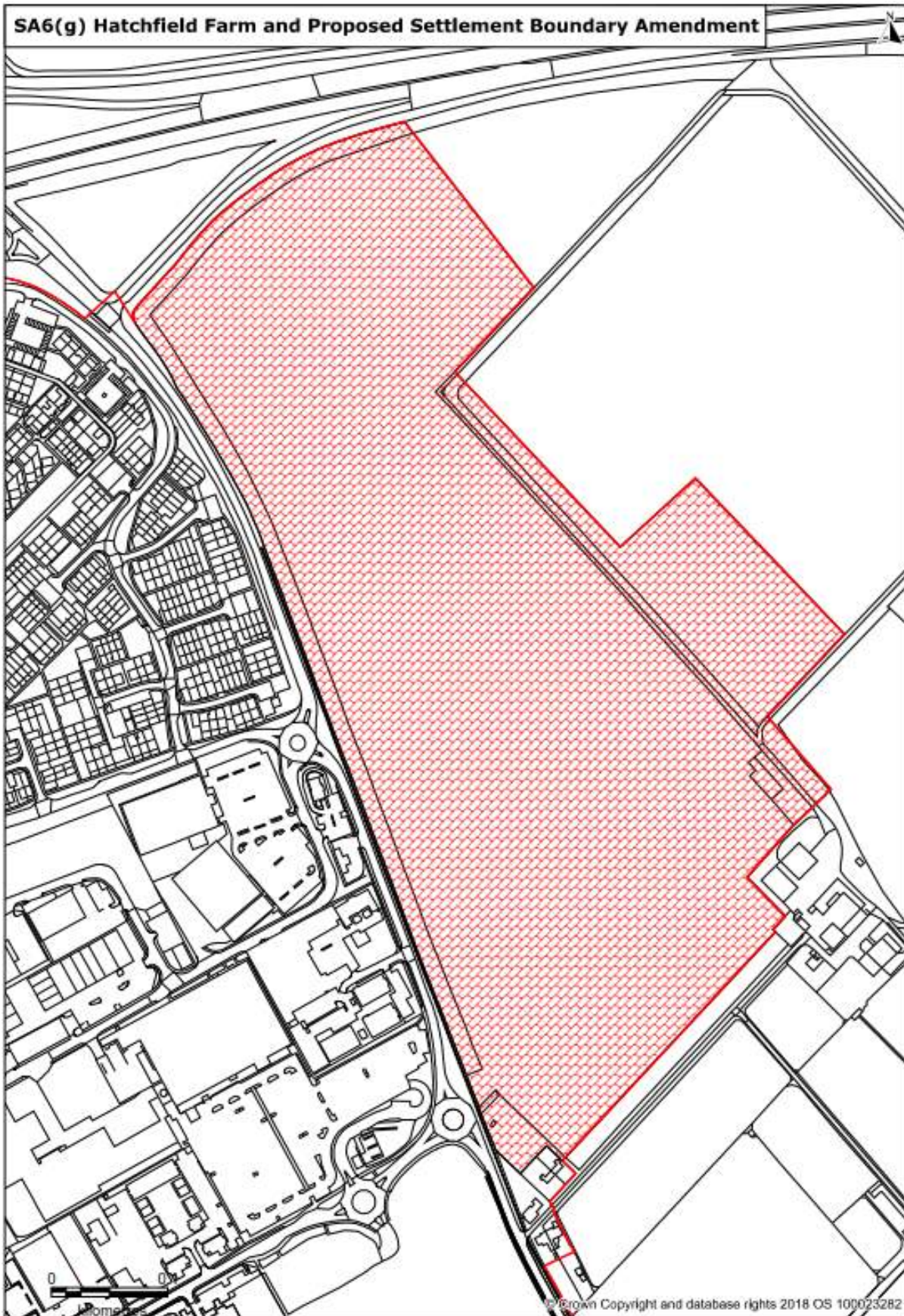
3.4.3 The two sites are quite separate within the town, with one being located within the town centre, and the other located well to the north of the town centre. As such, there are limited (but that is not to say nil) concerns regarding in-combination effects. There is clearly the 'reasonable' option of delivering 450 homes in total, across both sites.

3.4.4 There are also feasibly options involving delivering a fewer number of homes at one or both of the sites, such that the total additional allocation to Newmarket is fewer than 450. However, no particular opportunities present themselves -

- N/14 Hatchfield Farm - the site area/extent currently under consideration is as per the site area/extent that is currently the subject of the ongoing planning appeal. The site area/extent is reduced in scale from that which was a SALP preferred option in 2016 (and as shown in Figure 3.4, above). **Figure 3.7** shows the site currently under consideration. The site area is 26 ha, within which there is an assumption that 5 ha would be used for employment uses and 2.2 for education uses, leaving a maximum of 18.8 ha for housing. 400 homes across 18.8 ha equates to c.21.3 dph, which is not considered high.
- SA6(b) Land at Black Bear Lane and Rowley Drive Junction the figure of 50 homes was arrived at on the basis of detailed work to explore design options, and hence there is little potential to justifiably question the figure.

3.4.5 In conclusion, there is the potential to deliver additional housing at one or both of the sites in question, and there is no justification to explore options that would involve delivering either site to less than its full capacity. Options are considered further below.

Figure 3.7: The proposed reduced N/14 Hatchfield Farm site



Lakenheath

- 3.4.6 There is only one submission allocation at Lakenheath that might be deallocated or deliver a reduced number of homes without jeopardising the Council's ability to maintain its five year housing land supply. This is SA8(d) Land north of Burrow Drive and Briscoe Way, which is a submission allocation for 165 homes.
- 3.4.7 A remaining question is whether options should be examined that involve deallocation of the site and/or allocation for a reduced number of homes. In the view of Officers, there is little justification for exploring the option of allocation for a reduced number of homes, as there are no other boundaries within the site that might be used to limit the site extent (e.g. field boundaries), and the current proposed density is not high.⁷

Red Lodge

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

⁷ The site area is 9.2 ha, which indicates that 165 homes might be delivered at a density of c.18 dph. However, in practice the density will be higher than this, as there is a policy requirement to deliver a 'substantial buffer' to the Cut-off Channel that runs along the site's western edge and this allows for infrastructure on site to mitigate the effects on the SPA.

3.5 The reasonable alternatives

3.5.1 The ‘bottom-up’ discussion of sites and settlements presented within Sections 3.3 and 3.4 leads to a series of variables and options - see **Table 3.3**.

Table 3.3: Spatial strategy variables and options

| Variable | Options |
|------------|---|
| Newmarket | - Nil additional homes - 400 additional homes at N/14 - 50 additional homes at SA6(b) |
| Lakenheath | - Nil fewer homes - 165 fewer homes through deallocation of SA8(d) |
| Red Lodge | - Nil fewer homes - 50 fewer homes at SA10(a) |

3.5.2 There are potentially quite a large number of feasible permutations of these options. However, the number of ‘reasonable’ permutations narrows considerably once account is taken of the following ‘top-down’ messages to come out of Section 3.2 -

- The Inspectors have not raised soundness concerns regarding the overall quantum of growth to be provided for through the Local Plan, and the NPPF expects that the Council should produce a Local Plan that meets its OAHN, hence there is no realistic potential to reduce the total quantum of homes provided for through the Local Plan. This rules-out spatial strategy options that would involve: nil additional homes at Newmarket alongside fewer at Lakenheath and/or Red Lodge; and 50 additional homes at Newmarket alongside 165 fewer homes at Lakenheath.
- The Inspectors clearly wish to see a material shift in the distribution of housing, which rules out the options of: do nothing, i.e. nil additional homes alongside nil fewer homes; 50 additional homes at Newmarket alongside nil fewer homes at Lakenheath and Red Lodge; and 50 additional homes at Newmarket alongside 50 fewer homes at Lakenheath.

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

3.5.4 The above considerations led to the establishment of four reasonable spatial strategy alternatives - see **Table 3.4**.

Table 3.4: The reasonable spatial strategy alternatives

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

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

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

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

4 WHAT ARE THE SA FINDINGS AT THIS STAGE?

4.1 Introduction

4.1.1 This chapter presents appraisal findings in relation to the reasonable alternatives.

4.2 Methodology

4.2.1 The appraisal is presented within Table 4.1, which comprises 21 rows - one for each of the sustainability topics that make up the SA framework (see Chapter 2). Within each row the alternatives are categorised in terms of potential to result in ‘significant effects’ (using **red** / **green**) and also ranked in order of relative performance (with ‘ = ’ used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them).⁹

⁸ N.B. the percentage ‘buffer’ is calculated by adding the quantum of additional homes proposed under each option (e.g. +450 under Option 1) to the current supply of 7036 (as per Table 3 of the 13/11/17 letter) as compared to an OAN of 6800.

⁹ Red shading is used to indicate significant negative effects, whilst green shading is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given uncertainty regarding how policy will be implemented in practice. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how policy will be implemented ‘on the ground’ and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a ‘significant effect’ this is made explicit in the appraisal text. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’. It is also important to note that effects are predicted taking into

Table 4.1: Appraisal of the reasonable housing distribution alternatives

| <ul style="list-style-type: none"> • Option 1 + 450 Newmarket • Option 2 + 450 Newmarket - 50 Red Lodge • Option 3 + 450 Newmarket - 165 Lakenheath • Option 4 +450 Newmarket - 50 Red Lodge - 165 Lakenheath | | | | | |
|---|---|-----------------------|-------|-------|-------|
| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Housing | <p>The Submission SA Reports (2017) concluded that the Local Plan would result in significant positive effects, as Objectively Assessed Housing Need (OAHN) would be provided for.</p> <p>All of the current alternatives would involve allocation of land for additional homes. This is supported, from a ‘housing’ perspective, as it means increasing the certainty of OAHN being provided for in practice, recognising that there is always a risk of unforeseen delays in delivery. A higher buffer can also help in respect of ensuring a robust ‘trajectory’ of housing supply, i.e. a situation whereby a rolling five year housing land supply is maintained.</p> <p>In respect of Hatchfield Farm (allocation under all alternatives), the site is the subject of a live called in planning application. If the Secretary of State approves the planning application and no party challenges the decision, this will be followed by the necessary reserved matters and discharge of conditions, including any mitigation and infrastructure which may be needed prior to commencement on site. The first completions on site might be expected in the monitoring year 2022/23 (i.e. within the first five years) at the earliest, however the timescale for delivery of the site remains uncertain.</p> <p>In respect of the proposal to decrease the number of homes delivered at Red Lodge (Options 2 and 4) and Lakenheath (Options 3 and 4), it is not thought likely that this will have a bearing on the supply of land within the important first five years of the plan period. Also, it is not thought that there will be implications in respect of the number of affordable homes that can be delivered, as a proportion of market housing. Finally, it is worth noting that there are no implications for delivery of specialist housing.</p> <p>In conclusion, all alternatives would result in significant positive effects, and the order of preference reflects the total number of homes provided for.</p> | ★ 1 | 2 | 3 | 4 |

account the criteria presented within Schedules I and II of the Environmental Assessment of Plans and Programmes (SEA) Regulations [2004]. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects resulting from the development in combination with other on-going or planned activity).

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

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

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|--------------------|---|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Sports and leisure | <p>The Submission SA Reports (2017) concluded that significant effects are unlikely. The proposal to increase the proportion of growth directed to Newmarket is supported, recognising that the town is a focus of existing sports and leisure facilities (alongside Mildenhall and Brandon); however, this is a relatively minor consideration.</p> <p>In conclusion all alternatives are supported, but significant positive effects are not predicted. Whilst there is some support for options that would involve the greatest shift in spatial strategy, on balance it is deemed appropriate to conclude that the alternatives perform broadly on a par.</p> | | | = | |
| Poverty | <p>The Submission SA Reports (2017) concluded that: <i>“There may be the potential for significant positive effects, but at the current time there is no certainty in this respect. A masterplan is yet to be drafted for the possible scheme to the west of Mildenhall; and it is equally the case that there are many detailed matters to consider at Newmarket...”</i></p> <p>As discussed above, it is not thought that higher growth at Newmarket would have any positive transformational effect on the town. Development at Hatchfield Farm could deliver new employment land, and employment growth at Newmarket; however, it is not clear that there would be implications for ‘poverty’ objectives. There is also a need to factor-in <i>the potential</i> for housing growth to conflict with the horse-racing industry, an important local employer (see discussion below, under ‘Unemployment’).</p> <p>In respect of the proposal to decrease the number of homes delivered at Red Lodge (Options 2 and 4) and Lakenheath (Options 3 and 4), it is not thought likely that there will be implications for ‘poverty’ related objectives.</p> <p>In conclusion, there is little potential to differentiate between the alternatives, and significant effects are not predicted.</p> | | | = | |
| Noise | <p>The Submission SA Reports (2017) concluded that: <i>“There are notable constraints within the District; however, it seems that the preferred strategy has been developed so as to work around these constraints for the most part... As such, no significant negative effects are predicted.”</i></p> <p>Aircraft noise in the District is primarily caused by the airforce bases at Mildenhall and Lakenheath. SA8(d) at Lakenheath (fewer homes under Options 2 and 4) falls within the outer (66db) noise zone, and hence deallocation is supported.</p> <p>In conclusion, options involving deallocation of SA8(d) at Lakenheath are judged to perform relatively well.</p> | 2 | 2 | ★1 | ★1 |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|-------------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Air quality | <p>The Submission SA Reports (2017) concluded that: <i>“Overall, there may be some potential for negative effects on the AQMA given the allocated sites within Newmarket. However, significant negative effects are not predicted, reflecting the uncertainty involved.”</i></p> <p>The proposal to increase the quantum of growth directed to Newmarket under all alternatives gives rise to some cause for concern, as there will inevitably be increased traffic through the AQMA; however, it is difficult to conclude the likelihood of significant negative effects. The large Hatchfield Farm site is c.1.5 km from the town centre - i.e. beyond a distance that is easily walkable for all - however, it is located with very good access to the A14 (i.e. access that does not necessitate passing through the AQMA, or any other sensitive area).</p> <p>On the basis of the above discussion, there is little potential to differentiate between the alternatives, and significant negative effects are not predicted.</p> | | = | | |
| Water | <p>The Submission SA Reports (2017) concluded that: <i>“Housing growth in Forest Heath has implications for water resources; however, it is not clear that Forest Heath is any more sensitive than surrounding areas, or that there are areas within Forest Heath that are particularly sensitive. With regards to water quality, whilst the local water environment is sensitive, it is not clear that the decision with regards to growth quantum, broad spatial strategy, site selection or masterplanning/design has the potential to result in negative effects. Perhaps the most important issue is site specific policy to ensure that suitable mitigation is in place, e.g. Sustainable Urban Drainage Systems (SUDS). Significant negative effects are not predicted.”</i></p> <p>There is little reason to suggest that there are any site specific issues, or that lower growth (Option 4) is preferable, from a ‘water’ perspective. It follows that the alternatives perform on a par and significant negative effects are not predicted.</p> | | = | | |

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

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

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|--------------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Biodiversity | <p>The Submission SA Reports (2017) concluded that: <i>“The preferred broad strategy is to deliver very low growth at Brandon on the basis that the extent of constraint makes it unlikely (given current understanding) that it will be possible to sufficiently mitigate the negative effects of growth. This is a significant positive. Also, the decision to focus growth to the West of Mildenhall, with no growth to the east of Mildenhall, is supported from a biodiversity perspective... However, growth elsewhere within the highly constrained district also has the potential to impact cumulatively, including potentially as a result of traffic generation and associated air pollution (plus there is a need to account for housing growth outside the District adding to traffic)... so it is appropriate to ‘flag’ the potential for significant negative effects through the SA.”</i></p> <p>Forest Heath is generally a constrained district, in biodiversity terms. However, none of the sites in question are thought to be subject to particular biodiversity constraint.</p> <p>With regards to Hatchfield Farm (allocation under all alternatives), Breckland SPA is over 7km distant; Chippenham Fen and Snailwell Poor's Fen SAC is c.2.5km distant, and Newmarket Heath SSSI is c.1.5km distant. With regards to impacts to the European designated network of SACs and SPAs, the site was examined through Habitats Regulations Assessment (HRA) at the Preferred Options stage.¹⁰</p> <p>In respect of the proposal to decrease the number of homes delivered at Lakenheath (Options 3 and 4), this site is within 2 - 2.5km of Breckland SPA and SAC, and hence it may be fair to conclude that avoidance of housing growth is supported, from a perspective of wishing to minimise the risk of recreational impacts (albeit SANG would be delivered alongside development as mitigation); however, it is noted that development of this site would be required to deliver <i>“a substantial buffer next to the Cut-off Channel... providing semi-natural habitat adjacent to the water course.”</i></p> <p>In respect of the proposal to decrease the number of homes delivered at Red Lodge (Options 2 and 4) this site is within 1.5km of Breckland SPA, and hence it may be fair to conclude that avoidance of housing growth is supported, from a perspective of wishing to minimise the risk of recreational impacts (albeit SANG would be delivered alongside development as mitigation).</p> <p>In conclusion, lower growth is supported, and it is appropriate to ‘flag’ the risk of all alternatives leading to significant negative effects (as per the conclusion reached by the Submission SA Report).</p> | 4 | 3 | 2 | ★ |

¹⁰ See https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-site-allocations-local-plan.cfm

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

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

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|----------------------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Waste | The Submission SA Reports (2017) concluded that: <i>“No notable effects are predicted.”</i> The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives, hence the alternatives perform on a par, and notable effects are not predicted. | | | = | |
| Historic environment | <p>The Submission SA Reports (2017) concluded that: <i>“Through site selection and site specific policy it is likely that direct impacts to the historic environment can be avoided or appropriately avoided/mitigated. Significant negative effects are not predicted.”</i></p> <p>SA6(b) is sensitive from a historic environment perspective as it includes within its boundary several listed buildings at risk in the Suffolk Register, as well as paddocks and mature vegetation identified as important by the Conservation Area Appraisal. However, a yield of 50 homes was arrived at following detailed site specific investigations, taking full account of the heritage issues and opportunities; as such, there is no reason to suggest that the 50 homes proposal is a ‘negative’.</p> <p>None of the other sites in question are thought to be subject to significant heritage constraints. One consideration relates to the risk of increased traffic through the Newmarket Conservation Area; however, it is not possible to draw any conclusions.</p> <p>As such, the alternatives perform on a par, and significant negative effects are not predicted.</p> | | | = | |
| Unemployment | <p>The Submission SA Reports (2017) concluded that: <i>“In conclusion, it is apparent that an evidenced and suitably ambitious approach to employment growth is proposed, although there remain some question marks regarding the decision for restraint at Newmarket. The high employment growth approach at Red Lodge leads to some question-marks, but on balance would seem appropriate given the long term opportunities (to be explored further through the forthcoming West Suffolk Local Plan). As such, significant positive effects are predicted.”</i></p> <ul style="list-style-type: none"> Hatchfield Farm (allocation under all alternatives) is associated with pros and cons. It would enable delivery of 5ha of new employment land, an approach which is supported by the Council’s 2018 Employment Land Review (ELR).¹¹ | | | = | |

¹¹ The ELR (2018) concludes: *“The proposed inclusion of 5 ha at Hatchfield Farm offers a key opportunity to provide additional employment land in a successful business location characterised by stronger levels of market demand and strategic connectivity. The site is considered to be suitable for accommodating employment uses in future and could complement the smaller St Leger extension by offering a greater level of choice and flexibility to the market, as well as a scale of space that does not exist elsewhere in the town. Although the inclusion of an additional 5ha of employment land at Hatchfield Farm within the latest pipeline supply adds to the overall surplus of employment land identified in the 2016 ELR in quantitative terms, its inclusion is not considered to adversely affect the balance within Newmarket specifically. It may however, provide further scope to consolidate employment land supply in other parts of the District that attract more limited levels of market demand, subject to ongoing monitoring by the Council...”*

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

Table 4.2: Summary appraisal of the reasonable housing distribution alternatives

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

Overall conclusions

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

5 WHAT ARE THE NEXT STEPS?

- 5.1.1 There is now an opportunity for the reasonable alternatives to be given further consideration by the Council, prior to Proposed Modifications (i.e. proposed modifications to the submission Local Plan) being prepared and published for consultation. An SA Report Addendum will be published for consultation alongside Proposed Modifications.
- 5.1.2 Subsequent to the consultation, the Inspectors might 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.

APPENDIX I: MAP TERMINOLOGY

The aim here is to explain the terminology included within the legends for Figures 3.2 to 3.5.

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