

Sustainability Appraisal (SA) of the Forest Heath Single Issue Review (SIR) and Site Allocations Local Plan (SALP)

SA Statement

September 2019

REVISION SCHEDULE					
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1 INTRODUCTION

Background

- 1.1.1 The former Forest Heath District Council submitted the Single Issue Review (SIR) and Site Allocations Local Plan (SALP) to the Secretary of State on 24 March 2017 for independent examination. Examination hearings were held in 2017, overseen by two appointed Planning Inspectors.
- 1.1.2 Subsequently, a list of proposed main modifications (henceforth 'proposed modifications') to the submitted plans was published for consultation in April 2018, followed by resumed hearings in June 2018. Subsequently, some new information was submitted to the examination in December 2018 relating to Habitats Regulations Assessment (HRA), which led to a need to prepare and consult upon a further list of further proposed main modifications to the SALP in April 2019.
- 1.1.3 The Inspectors' final reports into legal compliance and the soundness of the plans was then published on 13 August 2019. The Inspectors concluded that the plan is legally compliant and sound, subject to a series of modifications being made. The SIR and SALP, incorporating modifications, are now recommended for adoption at a Full Council meeting on 19th September 2019.
- N.B. West Suffolk Council was formed on 1 April 2019, replacing both Forest Heath District and St Edmundsbury Borough Councils. West Suffolk Council is now the local planning authority and, on adoption, the SIR and SALP will become its responsibility to administer in relation to the area formerly defined as Forest Heath District.
- 1.1.4 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to sustainable development.

SA explained

- 1.1.5 It is a requirement that SA involves a series of procedural steps. The final step in the process involves preparing a 'statement' at the time of plan adoption. The aim of the SA Statement is to present:
- 1) The 'story' of plan-making / SA up to the point of adoption.
Specifically, there is requirement¹ to: *"summaris[e] how environmental considerations have been integrated into the plan....and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of the other reasonable alternatives dealt with."*
 - 2) Measures decided concerning the monitoring of plan implementation.
Specifically, there is a requirement to explain *"the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme."*

This SA Statement

- 1.1.6 This is the Forest Heath SIR and SALP (or, alternatively, the Forest Heath 'Local Plan') SA Statement, and hence considers **(1)** and **(2)** in turn.
- 1.1.7 This Statement concludes by presenting a checklist of legal requirements, with a view to demonstrating the legal compliance of the SA process undertaken with the SEA Regulations.

¹ The information to be provided in the Statement is listed in Article 9 of the SEA Directive and Regulation 16 of the SEA Regulations.

2 THE PLAN-MAKING / SA 'STORY'

2.1 Introduction

2.1.1 Key steps in the SA process were as follows:

- 1) An Initial SA Report was published at the Issues and Options stage in **2012**
- 2) Interim SA Reports were published at the Further Issues and Options stage in **2015**
- 3) Interim SA Reports were published at the Preferred Options stage in **2016**
- 4) SA Reports were published at the Proposed Submission / Publication stage in **2017**
- 5) An SA Report Addendum was published alongside Proposed Modifications in **2018** and then a second alongside Further Proposed Modifications in **2019**
- 6) The Inspectors published their reports in August **2019**

2.1.2 Each step is discussed, in turn, below, with greater attention given to latter steps. All SA documents are available at: westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan.cfm

2.2 Issues and Options / Initial SA Report (2012)

2.2.1 Subsequent to the High Court Judgement of March 2011 that quashed certain parts of Core Strategy Policy CS7 the council embarked on the Single Issue Review (SIR) process and began to consider 'issues and options'. An issues and options consultation document was published in July 2012, with an Interim SA Report published alongside.

2.2.2 The consultation document essentially reiterated, for each of the main settlements in the area, the level of housing provision that was set to be made through Policy CS7, and asked the question: *Is this level of provision about right, or is there a need for provision above or below this level?* The consultation document also discussed three area-wide housing scenarios: an 'economic growth' scenario (6,665 homes over the plan period, or 351 per annum); a 'current build rates' scenario (7,220 homes, or 380 per annum); and an 'affordable homes' scenario (12,711 homes, or 669 per annum).

2.2.3 The Initial SA Report published alongside the consultation document presented an appraisal of the three area wide scenarios, as well as the three scenarios for each settlement. The appraisal identified the potential for some options to lead to significant effects on particular aspects of the baseline. Key issues/impacts discussed as part of the appraisal included: noise pollution from American military aircraft; loss of publicly accessible open space; impact on biodiversity and natural capital; sustainability and quality of water supply; and quality of the rural environment.

2.2.4 The **consultation** included six public exhibitions, which 290 people attended, and generated 230 formal representations from 87 people.²

² See representations received here:

<https://democracy.westsuffolk.gov.uk/Data/Forest%20Heath%20Local%20Plan%20Working%20Group/20130704/Agenda/LPG%20FH%2013%2007%2004%20repop13007%20appA.pdf>

2.3 Further Issues and Options / Interim SA Reports (2015)

2.3.1 The Council consulted on SIR 'further issues and options' and SALP 'issues and options' in August 2015, with both documents accompanied by Interim SA Reports.

2.3.2 Focusing on the **SIR Interim SA Report**, the report presented information on alternatives in relation to both:

- Housing quantum; and
- Housing distribution.

2.3.3 With regards to quantum, an important starting point, in addition to 2012 appraisal findings and consultation responses, was the Cambridge Sub-Region Strategic Housing Market Assessment (SHMA) update (June 2013). The SHMA identified an objectively assessed housing need (OAHN) figure for Forest Heath of 7,000 homes over the period 2011 - 2031, equating to 350 dwellings per annum (dpa). In light of the SHMA, the Council gave consideration to whether there was the need to explore housing provision options above/below the OAHN figure. Ultimately, the Council determined that it was reasonable to appraise and consult upon a higher growth option involving 7,700 new homes in order to more fully meet affordable housing needs. The appraisal reached the following conclusion:

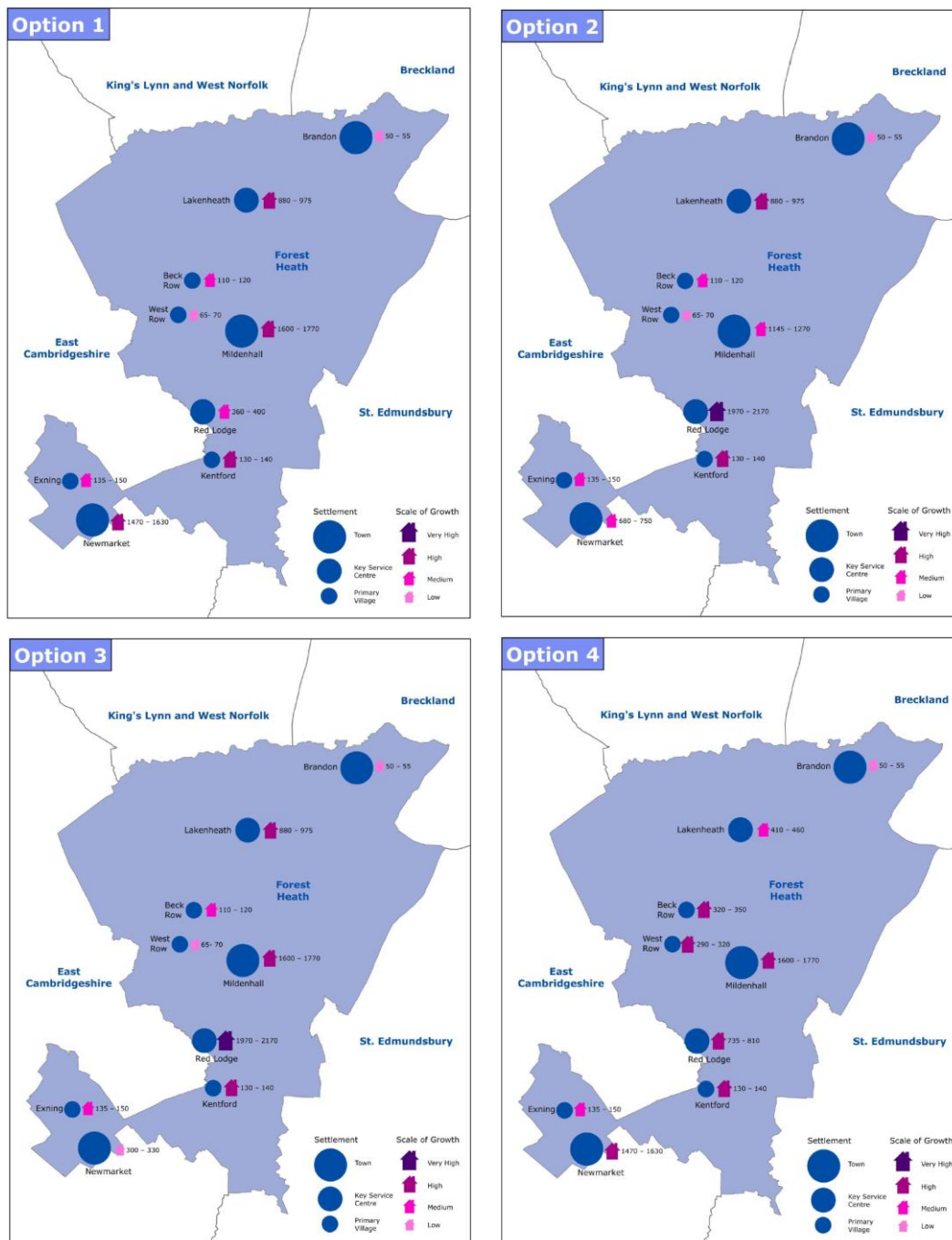
"A higher growth strategy (Option 2) would be preferable in terms of housing objectives, as identified affordable housing needs would be met to a greater extent (although 'objectively assessed housing needs' would be met under Option 1), and might lead to additional opportunities in terms of other community and economic objectives. However, given the Forest Heath situation it is not possible to conclude that a higher growth strategy would perform significantly better in terms of any objective. What is more clear, given the Forest Heath situation, is that a higher growth strategy would make it more of a challenge to ensure that impacts to the internationally important wildlife sites are avoided; however, there is potential to avoid or sufficiently mitigate effects and hence significant negative effects are not predicted for Option 2. Higher growth might also have negative implications for other environmental objectives, but there will be much opportunity to avoid/mitigate effects (through the spatial strategy and development management policy)."

With regards to distribution, the Council recognised that the first task was to consider each settlement in turn, establishing the alternative approaches that might reasonably be taken to housing delivery (see discussion within Section 8.2 of the report). Subsequently, four alternative approaches to housing distribution area-wide were established, each capable of delivering in the region of 7,000 - 7,700 homes over the plan period. The housing distribution alternatives from the 2015 Issues and Options stage are mapped in Figure 2.1, and in summary were as follows: 1) Focus on Newmarket, Mildenhall and Lakenheath; 2) Focus on Red Lodge and Lakenheath, with medium growth at Newmarket and Mildenhall; 3) Focus on Red Lodge, Mildenhall and Lakenheath with lower growth in Newmarket; and 4) Focus on Newmarket, Mildenhall and Red Lodge, plus Primary Villages with capacity. The appraisal reached the following conclusion:

"Overall, Options 1 and 4 perform best in relation to education, health, sports and leisure, poverty, landscape character, transport and unemployment. In contrast, Options 2 and 3 perform best in relation to renewable energy, accessible natural greenspace and built environment. Significant negative effects are predicted for all four options for biodiversity, with Option 4 performing best. Significant negative effects are also predicted for Option 4 in relation to the pollution of land – this relates to the loss of best and most versatile agricultural land at West Row. The only other significant negative effects predicted are for Options 1 and 3 in relation to noise. This relates to noise caused by the RAF bases at Mildenhall and Lakenheath."

2.3.4 With regards to the **SALP Interim SA Report**, the focus was on presenting an appraisal of 162 site options in respect of a list of criteria, which itself was developed with a view to reflect the established SA scope as closely as possible (see Section 4.3 of the report).

Figure 2.1: Housing distribution alternatives 2015



2.3.5

The **consultation** led to a total of 364 representations on the SIR from 98 respondents; and 893 representations on the SALP from 133 respondents. A list of key issues raised is presented within the Consultation Statement submitted alongside the SIR and SALP,³ which includes reference to a number of the issues/impacts that were a focus of appraisal findings presented within the Interim SA Reports. It is not possible to assume that all consultation responses drawing upon the Interim SA Reports will have made reference to the Interim SA Reports; however, it is helpful to give consideration to consultation responses referencing the Interim SA Reports nonetheless - see discussion within Appendix III of both the SIR and SALP SA Report (2017).

³ www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/C13-FHDC-Reg-22-Statement-of-Consultation-March-2017.pdf

2.4 Preferred Options / Interim SA Reports (2016)

2.4.1 The Council consulted on 'preferred options' for both the SIR and SALP from April to July 2016, with both documents accompanied by Interim SA Reports.

2.4.2 Focusing on the **SIR Interim SA Report**, the report presented information on a single set of refined spatial strategy alternatives, which varied in respect of housing distribution only, i.e. the decision was taken to hold constant the housing quantum at the level of OAHN (which latest evidence showed to amount 6,800 net new dwellings over the plan period, or 340 per annum). The reasons for taking this approach were explained within Section 6.4 of the report, but essentially latest evidence served to highlight the option of providing for higher growth, in order to more fully meet affordable housing needs (as per Growth Quantum Option 2 from 2015) to be unreasonable. With regards to distribution, three reasonable alternatives were initially identified and subjected to appraisal, before the alternatives being refined to the following two:

- 1) Higher growth at Mildenhall, Red Lodge and Villages, with lower growth at Newmarket
- 2) Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Villages
 - Relative to Option 1, this option involved 400 homes more at Newmarket, 200 homes fewer at Mildenhall, 100 homes fewer at Red Lodge; and 100 homes fewer at Villages.

2.4.3 The appraisal of these alternatives concluded:

"There is little potential to confidently differentiate between the alternatives in terms of the majority of topics. Notably, in terms of community related topics - 'Education', 'Health', 'Sports and leisure' and 'Poverty' - the alternatives perform broadly on a par. This primarily reflects the fact that under both options there would be a focus of growth at either Newmarket (the largest settlement, with the greatest offer in terms of services/facilities/retail and employment) or Mildenhall (where there are opportunities, given the assumption that growth would support development of a new 'hub' to the west of the town). There are also 'community' type issues associated with Red Lodge and the Primary Villages (higher growth under Option 1); however, it is not clear that there is the potential to differentiate the alternatives on this basis.

In total, the appraisal finds the potential to differentiate between the alternatives in terms of five topics, with 'Biodiversity' considerations perhaps being the most prominent. Biodiversity is a matter of central importance to the Single Issue Review, reflected in the fact that Brandon - as the most constrained settlement - is assigned very low growth under both options. Mildenhall is constrained, but initial work has identified good potential to sufficiently mitigate the impacts of growth (primarily through delivery of Suitable Alternative Natural Greenspace, SANG). This is a subject explored in detail through a separate process of Habitats Regulations Assessment (HRA); however, taking a precautionary approach it is deemed appropriate to 'flag' the risk of significant negative effects to result from Option 1 (higher growth at Mildenhall).

Other notable considerations, that enable the alternatives to be differentiated, relate to: 'Noise' (given constraints at Mildenhall, Beck Row and West Row); 'Air quality' (given the designated Air Quality Management Area in Newmarket); 'Renewable energy' (given the opportunity that presents itself at Mildenhall, where a hub scheme would enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver SANG alongside housing).

Finally, it is important to note that the appraisal finds there to be a high degree of uncertainty in respect of 'Unemployment'. This is on the basis that further evidence is needed regarding the merits of housing growth at Newmarket. Growth at Newmarket is in many respects to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have served to confirm the importance of the industry as an employer, and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact the industry."

2.4.4 The Council then responded to the appraisal (see Section 8 of the report), giving reasons for supporting the preferred option (Option 1).

2.4.5 With regards to the **SALP Interim SA Report**, as per the Issues and Options stage (discussed above), the focus was on presenting an appraisal of site options (175 at this time) in respect of the established list of criteria.

2.4.6 Also, it is important to note that both the **SIR and SALP Interim SA Reports** presented an appraisal of the preferred options / draft plan as a whole, taking into account proposed SIR strategic policy, proposed site allocations from the SALP and proposed site specific policy from the SALP. The appraisal reached the following conclusion (and also included a number of recommendations, which were then actioned subsequent to the consultation):

"In conclusion, significant positive effects are predicted in terms of: 'Housing' (given that objectively assessed housing needs will be met); and 'Education' (given that development will support provision of increased school capacity). Also, notable (or less certain) positive effects are highlighted in terms of a number of issues including: 'Poverty' (given the opportunity that presents itself at Mildenhall, where the proposal is to develop a new 'community hub'); and 'Unemployment' (given support for the delivery of well-located employment land, albeit there are uncertainties given that housing growth may conflict with the Horse Racing Industry at Newmarket).

Significant negative effects are predicted only in terms of 'Land and soil' (given the likelihood that a significant amount of 'best and most versatile' agricultural land will be lost to development). Also, in terms of a number of other issues, potential draw-backs and uncertainties are highlighted. Notably, draw-backs are highlighted in terms of: 'Health' (given the decision not to maximise growth at the largest settlements, which has implications for access to services/facilities and walking/cycling); and 'Biodiversity' (with the conclusion reached that: "On balance, steps taken through the broad strategy (notably low growth at Brandon), site selection (notably the focus of growth to the west of Mildenhall) and site specific policy (notably detailed policy for the west of Mildenhall scheme) should ensure no significant negative effects. However, there remains some uncertainty, given the sensitivities.")"

2.4.7 The **consultation** led to a total of 152 representations on the SIR from 51 respondents; and 418 representations on the SALP from 87 respondents. A list of key issues raised is presented within the Consultation Statement submitted alongside the SIR and SALP,⁴ which includes reference to a number of the issues/impacts that were a focus of appraisal findings presented within the Interim SA Reports. It is not possible to assume that all consultation responses drawing upon the Interim SA Reports will have made reference to the Interim SA Reports; however, it is helpful to give consideration to consultation responses referencing the Interim SA Reports nonetheless - see discussion within Appendix III of both the SIR and SALP SA Report (2017).

⁴ www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/C13-FHDC-Reg-22-Statement-of-Consultation-March-2017.pdf

2.5 Publication / SA Reports (2017)

- 2.5.1 The Council published 'pre-submission' versions of both the SIR and SALP between January and March 2017, with both documents accompanied by SA Reports (thereby meeting the legal requirement set out under Regulation 19 of the Local Planning Regulations).
- 2.5.2 Focusing on the **SIR Interim SA Report**, the report presented information on a refined single set of spatial strategy alternatives, which varied in respect of housing distribution only, as per the 2016 preferred options stage - see Table 2.1. Specifically, the spatial strategy alternatives varied primarily in respect of the approach to growth at Newmarket, and approach determined to be a 'reasonable' on the basis of the latest evidence (e.g. see discussion within Box 6.2 of the report).

Table 2.1: The 2017 reasonable alternatives

	Completions and commitments (2011-2016)	Option 1 Modified April 2016 preferred option (in-light of the Hatchfield decision)				Option 2 Approach aligned to the April 2016 preferred option			
		Allocations	Total housing	% of allocations	% of total housing	Allocations*	Total housing	% of allocations	% of total housing
Brandon	59	71	130	2	2	68	127	2	2
Mildenhall	185	1412	1597	34	24	1359	1544	33	24
Newmarket	291	321	612	8	9	654	945	16	14
Lakenheath	95	828	923	20	14	828	923	20	14
Red Lodge	699	1129	1828	27	28	896	1595	22	24
Primary Villages	953	454	1407	11	21	314	1267	8	19
Other (i.e. rural area)	155	0	155	0	2	0	155	0	2
Total	2437	4,215	6,652	100%	100%	4,119	6,556	100%	100%
Windfall	225								
Total housing (completions, commitments, allocations and windfall)	6,877				6,781				

2.5.3 The alternatives appraisal reached the following conclusion:

“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).”*

2.5.4 Section 8 of the report then presented the Council’s reasons for supporting the preferred option (Option 1) in light of the alternatives appraisal. The Council recognised that there were feasibly certain benefits to higher growth at Newmarket, but ultimately rejected 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.”*

2.5.5 With regards to the **SALP SA Report**, as per the issues and options and preferred options stage (discussed above), the focus was on presenting an appraisal of site options (180 at this stage) in respect of a list of criteria. Also of note is Section 8.2 of the report, which presented the Council’s reasons for rejecting the allocation of certain more marginal omission sites, namely those classified as ‘omitted sites’ within the Council’s Omission Sites document, which was published alongside the Pre-submission Plans and SA Reports.

2.5.6 Also, it is important to note that both the **SIR and SALP SA Reports** presented an appraisal of the preferred options / draft plan as a whole, taking into account proposed SIR strategic policy, proposed site allocations from the SALP and proposed site specific policy from the SALP. The appraisal reached the following conclusion:

“Significant positive effects are predicted in terms of: ‘Housing’ (given that objectively assessed housing needs will be met); ‘Education’ (given that development will support provision of increased school capacity); and ‘Unemployment’ (given the approach to employment land supply/provision, which is ambitious and broadly in accordance with the findings of the 2016 Employment Land Review). Also, lesser, or less certain, positive effects are highlighted for a number of issues including ‘Poverty’ (given the opportunity that presents itself at Mildenhall, where the proposal is to deliver large scale new housing adjacent to a new ‘community hub’).

Significant negative effects are predicted in terms of ‘Land’ (given the likelihood that a significant amount of ‘best and most versatile’ agricultural land will be lost to development); and ‘Biodiversity’ (given uncertainty at the current time regarding whether / to what extent there will be impacts resulting from traffic / air pollution, as discussed within the HRA Report published at the current time alongside the Proposed Submission SIR). The biodiversity issue is set to be addressed by further work, i.e. work to examine traffic flows and air quality impacts to the Breckland Special Protection Area (SPA).

Also, in terms of a number of other issues, potential draw-backs and uncertainties are highlighted. Notably, draw-backs are highlighted in terms of: ‘Health’ (given the decision not to maximise growth at the largest settlements, which has implications for access to services/facilities and walking/cycling); and also the approach to growth (both housing and employment) at Newmarket.

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). It is noted that: “On 11 October 2016, Forest Heath District Council announced a commitment to prepare a prospectus for Newmarket and its community. The prospectus for Newmarket will draw together relevant stakeholders to develop a piece of work which will feed into the preparation of the next Local Plan.”

2.5.7 Also, the following notable concluding statement was made:

“Numerous policy specific recommendations have been made along the course of the SA process, and these have now been actioned in the most part. The only outstanding specific recommendation relates to the matter of phasing of growth and infrastructure upgrades at Mildenhall. The situation is evolving, and so it may prove appropriate to add settlement or site specific policy commitments, building on those already in place through Core Strategy Policy CS13 (Infrastructure and Developer Contributions), through modifications to the plan, during the Examination stage of plan-making.”

2.5.8 The **consultation** led to a total of 42 representations on the SIR from 29 respondents; and 228 representations on the SALP from 88 respondents. A list of key issues raised is presented within the Consultation Statement submitted alongside the SIR and SALP,⁵ which includes reference to a number of the issues/impacts that were a focus of appraisal findings presented within the Interim SA Reports. It is not possible to assume that all consultation responses drawing upon the Interim SA Reports will have made reference to the SA Reports; however, it is helpful to give consideration to consultation responses referencing the SA Reports nonetheless - see documents D24 and D53 here:

https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-core-document-library-2017-section-d-documents.cfm

⁵ www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/C13-FHDC-Reg-22-Statement-of-Consultation-March-2017.pdf

2.6 Proposed modifications and SA Report Addenda (2018 and 2019)

- 2.6.1 The first hearing sessions in relation to the SIR and SALP were held in September and October 2017. The Inspectors subsequently wrote to the Council raising concerns regarding the balance of growth as proposed, subsequent to which the Council published Main Modifications to the SALP in April 2018, with an SA Report Addendum published alongside. Further hearing sessions were then held in June 2018. Subsequently, some new information was submitted to the examination, which led to a need to prepare and consult upon a further list of further proposed main modifications to the SALP in April 2019, with a further SA Report Addendum published alongside.
- 2.6.2 Focusing on the first SA Report Addendum (2018), this sought to both A) explain how the Council gave further consideration to spatial strategy alternatives ahead of arriving at proposed modifications; and B) present an appraisal of the proposed modifications.
- 2.6.3 In respect of (A), Section 3 of the report presented detailed review of high-level, settlement-specific and site specific issues and options (see Figure 2.2), before arriving at four reasonable spatial strategy alternatives - see Table 2.2.

Figure 2.2: Establishing reasonable spatial strategy alternatives

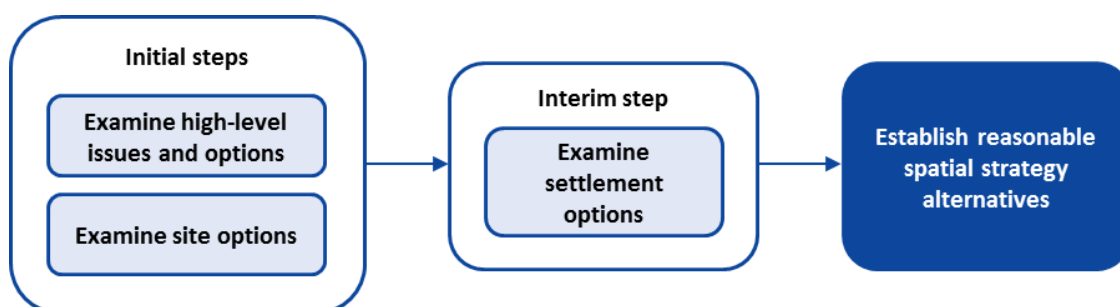


Table 2.2: The reasonable spatial strategy alternatives

Option	Changes to SIR distribution	% distribution to Towns	% distribution to KSCs	% over OAN ⁶
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%

⁶ 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.

2.6.4 The appraisal concluded as follows:

“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.”

2.6.5 In respect of (B), the report presented a summary appraisal table, which was then subsequently updated by the 2019 SA Report Addendum - see Table 2.3.

Table 2.3: Summary effects of the plans plus proposed modifications and further proposed modifications

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Housing	Significant positive effects	This conclusion was found to hold true, and indeed the effect of proposed modifications (2018) was to significantly bolster this conclusion.	Limited or none
Crime	Limited or broadly neutral effects	Limited or none.	Limited or none
Education	Significant positive effects	This conclusion was found to hold true, and indeed the effect of proposed modifications (2018) was to significantly bolster this conclusion.	Limited or none
Health	Limited or broadly neutral effects	This conclusion was found to hold true. The appraisal of proposed modifications (2018) highlighted a number of issues associated with new Hatchfield Farm site; however, on balance it was not possible to conclude the likelihood of significant negative effects in respect of ‘health’ related issues/objectives.	Limited or none
Sports and leisure	Limited or broadly neutral effects	Limited or none.	Limited or none
Poverty	Limited or broadly neutral effects	Limited or none.	Limited or none

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Noise	Limited or broadly neutral effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications'; however, there was some added uncertainty (i.e. risk of significant negative effects).	Limited or none
Air quality	Limited or broadly neutral effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications'; however, there was some added uncertainty (i.e. risk of significant negative effects).	Limited or none
Water	Limited or broadly neutral effects	Limited or none.	Limited or none
Land	Significant negative effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications', although the proposal to deallocate SA8(d) at Lakenheath lead to an improvement in the plan's performance.	Limited or none
Flooding	Limited or broadly neutral effects	Limited or none.	Limited or none
Climate change resilience	Limited or broadly neutral effects	Limited or none.	Limited or none
Renewable energy	Limited or broadly neutral effects	Limited or none.	Limited or none
Biodiversity	Significant negative effects	It was considered appropriate to retain this conclusion, in respect of 'the submission plans plus proposed modifications'. However, concerns were allayed following discussions during the examination hearings and the signing of Statements of Common Ground.	Positive implications, leading to a conclusion that the plans plus proposed modifications and further proposed modifications will not lead to significant negative effects.

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Greenspace	Limited or broadly neutral effects	This conclusion was found to broadly hold true for 'the submission plans plus proposed modifications'. There were concerns associated with deallocation of SA9(d), but the proposal to allocate Hatchfield Farm and reduce the quantum of growth at North Red Lodge were supported.	Limited or none
Built environment	Limited or broadly neutral effects	Limited or none.	Limited or none
Landscape	Limited or broadly neutral effects	Limited or none.	Limited or none
Transport	Limited or broadly neutral effects	This conclusion was found to broadly hold true for 'the submission plans plus proposed modifications'. The shift in spatial strategy was supported, and allocation of Hatchfield Farm specifically was supported (albeit there remained a degree of uncertainty).	Limited or none
Waste	Limited or broadly neutral effects	Limited or none.	Limited or none
Historic environment	Limited or broadly neutral effects	This conclusion was found to broadly hold true for 'the submission plans plus proposed modifications'. Proposed modifications dealt with the approach to redevelopment at SA6(b), which is a sensitive site within the Newmarket Conservation Area; however, detailed wording (supporting text) was proposed to ensure no negative effects (and potentially an enhancement to the baseline).	Limited or none
Unemployment	Significant positive effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications', albeit there was a degree of uncertainty, recognising the need to apply the adopted development management policy (DM48) to mitigate impacts to the horseracing industry.	Limited or none

2.7 Plan finalisation (2019)

2.7.1 The Inspectors' final reports on SIR and SALP legal compliance were received in August 2019. The reports comment on a number of the issues that had been a focus of preceding SA, notably:

- Housing quantum - paragraphs 36 and 37 of the SIR Inspectors' report discuss reasons for not supporting an uplift for affordable housing, before paragraph 38 concludes: *"In the light of all this, we see no strong imperative to provide more new homes than those assessed objectively to be needed. Overall, we consider the housing requirement to be justified."*
- Housing Distribution - paragraph 54 of the SIR Inspectors' report explains that "the SIR as originally submitted is neither adequately consistent with national policy nor is it justified – it has not been demonstrated to be the most appropriate strategy when considered against the reasonable alternatives... However, the Council has put forward MM3 to rectify matters. This re-balances the distribution of dwellings between the Towns and Key Service Centres. In so doing, it increases the number of dwellings earmarked for Newmarket, the largest town in the area, by 450 additional dwellings and reduces the number of new homes directed towards Red Lodge and Lakenheath by 50 and 165 respectively." The Inspectors support this adjusted strategy on the basis that *"this distribution better reflects the relative importance and perceived roles of the settlements, and their sustainability credentials in terms of the presence of shops and services, public transport, walking and cycling."*
- Approach to growth at Newmarket - is discussed over paragraphs 57 to 67 of the SIR Inspectors' report, which includes the following key statements:

"The horse racing industry ('the HRI') is a fundamental part of both the economic and physical fabric of Newmarket. The potential for housing growth in Newmarket to lead to adverse effects on the HRI is a key issue here, particularly as MM3 proposes an increase in housing beyond that originally proposed, albeit only by 450 homes."

... However, it is clear to us that the Council has selected Newmarket's housing apportionment on the basis of an evidential understanding of the effects of horse movements around the town."

... Moreover, policies in the DMP provide a planning policy framework for dealing with the issues pertinent to the HRI. This, along with the Council's decision making powers, will ensure that the Council is able to secure horse walks and/or crossing improvements that are necessary to make any new developments acceptable, and to reject any schemes that would lead to safety problems or other unacceptable impacts."

- Mix of uses at Hatchfield Farm, Newmarket (450 home mixed use allocation) - paragraphs 50 and 51 of the SALP Inspector's Report explains that:

"MM40 amends paragraph 6.11 to reflect the employment land proposed allocation at Hatchfield Farm. The justification for the site's inclusion relates in part to the previous history of the site (a previous planning application on the site included an element of employment land), that the site is in a sustainable location, close to the existing established employment area of Newmarket and would add to the choice of employment sites within the area. Given that the proposed site allocation includes residential development, the allocation would ensure trip generation rates remain low in the interests of sustainable development... The addition of 5ha of employment land at Hatchfield Farm would increase the supply of employment land within the Forest Heath area beyond that recommended by the ELR. Nevertheless in doing so, it would add to the choice of sites for employment purposes in the largest settlement within the area and as such, in a sustainable location it would be consistent with the Framework..."

2.7.2 In respect of the Sustainability Appraisal process:

- The SIR Inspectors' report states at paragraph 87 that: *"The SA has been prepared and published for consultation at the Regulation 19 stage (CD C4). It was subsequently updated in April 2018 (CD F2) and again in April 2019 (CD E3). The SA clearly explains how it has influenced the development of the SIR and assessed reasonable alternatives as part of this process. We note that there have been some criticisms of the SA in relation to the depth of the consideration of alternatives. However, the Planning Practice Guidance ('the PPG') is clear that the SA should not be done in any greater detail than is considered to be appropriate for the content and level of detail of the Plan. In the context of the broad, strategic nature of the SIR, the SA as prepared satisfies this guidance and is adequate."*
- The SALP Inspector's Report states at paragraph 90 that: *"The SA has been prepared and published for consultation at the Regulation 19 Stage. It was subsequently updated in April 2018 (CD F2) and again in April 2019 (CD F3). The SA clearly explains how it has influenced the development."*

3 MEASURES DECIDED CONCERNING MONITORING

3.1.1 With regards to monitoring, Section 9 of both the SIR and SALP state:

"Monitoring is an important part of the planning process and a useful tool to help understand the social, environmental and economic issues affecting an area and the key drivers for spatial change. It is important that the Site Allocations Local Plan can respond to changing circumstances and that policies are monitored to ensure that sites are being delivered and policies are achieving their purpose."

Updates on the status of sites, the progress in site delivery and the effectiveness of the policies in this Plan will be recorded annually in the council's Authority Monitoring Report. Indicators will be used to monitor the policies which will enable the following issues to be considered:

- whether the policies are working effectively or whether they require adjusting to a more flexible approach;
- whether any wider national policy changes are having an impact on the application of the Site Allocations Local Plan policies.

Co-operation between the council and public and private agencies and organisations has helped to shape this Local Plan. This co-operation will continue in the monitoring and implementation of the plan, particularly in the monitoring of infrastructure delivery required to deliver the allocated sites."

3.1.2 The following indicators are monitored through the Annual Monitoring Report (AMR) –

1. Overall Housing Provision and Total amount of housing completed
2. Number and percentage of new dwelling completed on brownfield land
3. Provision of Affordable Housing Dwellings
4. Number of permanent Gypsy and Travellers pitches provided
5. Total amount of additional employment floorspace – by type
6. Employment land available – by type
7. Amount of employment floorspace available on previously developed land – by type
8. Amount of retail frontage in town centres
9. Change in number and area of designated nature conservation sites
10. Reported condition of SSSIs
11. Achievement of habitat action plan targets
12. Achievement of species action plan targets

13. Achievement of geodiversity action plan targets
14. Properties at risk of flooding
15. Flood risk – planning applications approved against Environment Agency advice
16. Number of air quality management areas and dwellings affected
17. Number of developments that provide 10% + of energy from renewable sources
18. Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre
19. Number of listed buildings and buildings at risk
20. Number and area of Conservation Areas and Article 4 Directions
21. % of residents who are happy with their neighbourhood
22. % footpaths and other rights of way which are easy to use by members of the public
23. Proportion of journeys to work on foot or by cycle

N.B. Data is not currently collected for indicators 11, 12, 13, 15, 17 and 23, and a proxy is used for indicator 18.

- 3.1.3 The list of indicators for which data is collected through the AMR process is fairly narrow, with gaps relating to important plan and sustainability objectives. However, it noted that monitoring work will be undertaken outside the AMR process. Importantly, monitoring of biodiversity impacts will be undertaken in cooperation with developers, with arrangements finalised at the planning application stage. One of the key components of the Council's recently published Recreation Mitigation and Monitoring Strategy is that: *"Where appropriate and proportionate to the scale and location of development, monitoring should be secured. Consultation with Natural England will be necessary to agree the level of monitoring."*
- 3.1.4 On this basis, it was possible for the SA Report to conclude that the monitoring framework is proportionate, and this conclusion was reiterated in the final SA Report Addendum (2019), although the report did note that modifications proposed at that time, which were subsequently broadly accepted by the Inspector, give rise to a need to consider monitoring of traffic movements within Newmarket, and potentially also implications for safe horse movements and/or air quality.

4 CONCLUSIONS ON THE SA PROCESS

- 4.1.1 This SA Statement demonstrates that a robust SA process has been progressed alongside plan-making, with appraisal findings and consultation responses feeding in to decision-making at key junctures. Most importantly, in terms of compliance with both the SEA⁷ and Local Planning⁸ Regulations, SA Reports was published alongside the proposed submission versions of the SIR and SALP in 2017, with the reports presenting the required information, namely the information required by Regulation 12 of the SEA Regulations. An SA Report Addendum was then published in 2019 in respect of the proposed modifications to the plan. These reports served to inform representations on the plan, and then served to inform plan finalisation.
- 4.1.2 This SA Statement is the final step in the SA process. Its aim is to explain the 'story' of the plan-making / SA process, and also present measures decided concerning monitoring. **Table 4.1** serves to demonstrate that this report presents the required information.

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

⁸ Town and Country Planning (Local Planning) (England) Regulations 2012

Table 4.1: Regulatory checklist

The SA Statement must...	How has this report presented the required information?
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	<p>This report has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation, which in turn were taken into account, and have been integrated into the plan.</p> <p>First and foremost, the relative merits of competing site options and spatial strategy alternatives were appraised in terms of a range of sustainability issues/objectives, with a view to informing selection of the best performing sites / spatial strategy.</p>
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	<p>This statement seeks to explain an iterative process, particularly in respect of exploring reasonable alternatives.</p> <p>Reference is made to consultation responses received throughout Section 2, and it is naturally the case that all consultation responses were taken into account by the plan-makers at the subsequent plan-making stage, and by the SA consultants, both when refining understanding of the SA scope, and when establishing new / updated reasonable alternatives.</p> <p>Also, Section 2.7 seeks to demonstrate that appraisal findings and consultation responses received were taken into account by the Inspector when deciding on modifications / finalising the plan.</p>
Summarise the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.	<p>Section 2 explains how the Council explicitly responded to the alternatives appraisal ahead of the plan being finalised for consultation at the preferred options, proposed submission / publication and proposed modifications stages.</p> <p>The Inspectors' reports equally set out detailed reasons in support of his conclusion on plan soundness, with reference to reasonable alternatives.</p>
Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan	See Section 3