

Sustainability appraisal responses

Respondent Name	Agent Name	Question Number	User's Response: Free-Text
Colin Campbell (Hill Residential Limited)		Section 1 - introduction	The purpose of the SA is to appraise the potential impacts of differing options. The approach to some issue is overly simplistic. For example, any site within 50m of a Grade II* listed building achieves a red, as does any site within 25m of a Grade II listed building. That simply measures proximity to such features, but not impact upon them. That can only be ascertained at a detailed design stage. Simply being close to a listed building does not render there to be a negative impact. Similarly, all objectives seem to have the same weighting. Development which could have a significant negative impact on the SPA/SAC is given the same impact as a development within 25m of a Grade II listed building. The findings of the SA are simply sweeping assumptions and not evidence based. The suggestion that a standalone New Settlement is better from an Air Quality perspective cannot be substantiated - it would depend on where it is located and the measures put in place to ensure it does not simply become a car borne commuting dormitory. Similarly, there is no evidence to suggest that such a settlement would perform well in terms of biodiversity, nor to support the assertion that Option 4 performs the worst in terms of biodiversity.
Mr Alfred Carr		Section 1 - introduction	We "Do Not Want" the 200/400 New Houses To Be Built In the Village of STANTON, SUFFOLK, and just outside ... You have not considered the Village "Infrastructure" for the traffic getting in and out of the Village ... You need to make sure that the Entry & Exit to any New proposed development has it's own Road In and it's own Road Out, do not bring it through this small Village which is already overflowing with too many vehicles ... Possibly another 400/800 additional Residents ... Possibly another 400 cars having to pass through what is already an overcrowded Village ... The Area has nothing to offer the residents ... The Village has not got the shop's to handle this growth ... The Village and Area have no Jobs or Employment to offer new residents ... You have not considered the Already Overcrowded School ... You have not considered the Already vastly overcrowded Doctors Surgery ...
Mr Richard Hack (Natural		Section 1 - introduction	We welcome the framework of the Sustainability Appraisal (SA) as presented in section 3.3. However we advise that the framework for Communities Overall includes reference to improving people's access to nature in addition to green infrastructure. We also welcome the

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England)			objective to achieve biodiversity net gain. We advise this should be tested as the plan develops. It can be considered alongside other economic, social and environmental objectives, for example highlighting areas where there is a lack of open space provision or issues of health and wellbeing and linking to how biodiversity net gain may help to tackle these issues as part of wider green infrastructure.
Gareth Mears (Persimmon Homes Ltd)	Nicky Parsons (Pegasus Group)	Section 1 - introduction	The SA provides an assessment of the distribution options. PHL notes that option 4 consistently scores low but there is little in the document to justify this. An example is climate change where option 4 is ranked 4th (i.e. last). The commentary suggests this is because the lower tier settlements are less accessible with reduced viability for infrastructure improvements or renewable/low carbon energy infrastructure. There is no evidence to support this and PHL considers that this is significant conclusion for the assessors to have jumped to. West Suffolk is blessed with many settlements that have high land values and comparatively low constraints. To assume that they are less viable locations would be wrong. Furthermore, it disregards those settlements that are already served by a commutable bus service (as identified in the settlements study) or those that could be improved. PHL considers that the development options assessment should be repeated with the benefit of the evidence needed to reach the assumptions being made. The SA considers the site options that have come from the Strategic Housing and Economic Availability Assessment. Chapter 8 provides a summary of the appraisal of the site options and confirms at paragraph 8.2.1 that 'the method involves examining the spatial relationship (i.e. proximity / intersect) between all included SHELAA sites and a range of constraint features (e.g. flood zones) and opportunity features (e.g. s GP surgery) for which data is available in digitally mapped form for the District as a whole'. Table B provides the summary of analysis for included SHELAA sites. It includes the familiar RAG rating. However, it is noted that there are grades of colouring across the standard red, amber and green and the implications or justification for these do not seem to have been explained in Table A. As such, PHL is unable to comment further on the ratings given for WS022 or WS155.
John Derry		Section 1 - introduction	1.1.1 Why were AECOM selected to undertake the SA? They have infrastructure expertise demonstrated in major urban projects, do they have expertise in the nuances of rural communities and small towns?

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Mrs Lisa Skinner (Phase 2 Planning)		Section 1 - introduction	see statement on behalf of the Hundon Resident's Group for the entire document
. . (The Underwood family and Hill Residential Limited)	Colin Campbell (Hill Residential Limited)	Section 1 - introduction	The purpose of the SA is to appraise the potential impacts of differing options. The approach to some issue is overly simplistic. For example, any site within 50m of a Grade II* listed building achieves a red, as does any site within 25m of a Grade II listed building. That simply measures proximity to such features, but not impact upon them. That can only be ascertained at a detailed design stage. Simply being close to a listed building does not render there to be a negative impact. Similarly, all objectives seem to have the same weighting. Development which could have a significant negative impact on the SPA/SAC is given the same impact as a development within 25m of a Grade II listed building. The findings of the SA are simply sweeping assumptions and not evidence based. The suggestion that a standalone New Settlement is better from an Air Quality perspective cannot be substantiated - it would depend on where it is located and the measures put in place to ensure it does not simply become a car borne commuting dormitory. Similarly, there is no evidence to suggest that such a settlement would perform well in terms of biodiversity, nor to support the assertion that Option 4 performs the worst in terms of biodiversity.
Matthew Axton (West Suffolk Council)		Section 2 - what's the plan seeking to achieve?	2.4. Plan Aims and Objectives - Apologies, I'm sure these are set out in more detail elsewhere, however, I've not yet looked at all the documents and may not have the time to comment on all - however, there is no mention of soil quality/land contamination here. Would it be appropriate to add in SO15 "ensure soils and groundwater are not impacted by contamination".
. . (Newmarket Horsemen's Group)	Nicky Parsons (Pegasus Group)	Section 2 - what's the plan seeking to achieve?	Chapter 3 of the document rehearses the scope of the SA. Paragraph 3.3.2 asks for comments on the scope of the SA. The NHG has provided comments above on the Scoping Report and summarises these in relation to Table 3.1 of the SA. The economy topic identifies an objective of ensuring education and skills provision to meet the needs of existing and future labour markets. The HRI has a substantial and talented training and education element that ensures that skills for the HRI can be nurtured and developed within the

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			<p>District. The NHG requests that this is recognised and supported in the SA work and the planning policy preparation. The economy topic also has the objective of supporting a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the District's town and local centres, and employment areas. The NHG's experience is that previous economic work has not adequately identified the contribution that the HRI makes to the local jobs market. It requests that this objective is expanded to explicitly refer to the protection and continued growth of the HRI. Paragraph 2.5.4 of Part 3 of the Regulation 18 version of the Local Plan recognises equine related employment is the largest single sector in Newmarket - accounting to 35% of all jobs. This is a significant proportion that deserves explicit mention as an industry to protect when applying economic objectives in the SA work. The HRI has obviously been impacted by the pandemic with some sectors being affected in different ways. It is clearly too soon to understand the long-term implications of the pandemic for the industry and so it is important that we continue to look at ways to protect it and encourage future growth. Four options for the distribution of development are being considered and the consultation is seeking opinions on these. Chapter 6 of the SA explains how these four options were established. It explains that these are the options selected by the Council as being the 'breadth of approaches that might reasonably be taken to distribution housing growth through the Local Plan (in light of the plan objectives). This highlights the importance of establishing the appropriate objectives in the plan when considering the options. The NHG considers that the HRI is worthy of an objective of its own and that this then be used to identify what could be considered as reasonable alternatives. The Strategic Objectives of the plan are outlined in chapter 4 of part 1. They do not include a specific objective for the protection and development of the HRI and the NHG considers that this is a significant omission given the acknowledge importance of the HRI to the wide economy, and employment as well as the historic character of Newmarket. We will expand on this further in our comments on Part 1. In terms of the SA, the NHG considers that this omission has skewed the reasonable alternatives that are to be assessed by the SA and needs to be revisited to take account of the HRI in devising the options for distribution of growth.</p>
Mr Andrew Fillmore	Ms Sophie Pain	Section 3 - what is the	6.1.4 Pigeon welcomes the assessment of reasonable alternatives in West Suffolk, which explores four options for the spatial location of development in West Suffolk. The four spatial

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(Pigeon Invement Management Ltd)	(Turley)	scope of the SA?	<p>options as identified within the SA are: * Option 1: New settlement * Option 2: Towns and KSCs * Option 3: Towns, KSCs and LSCs * Option 4: Towns, KSCs, LSCs and Type A villages</p> <p>It is immediately evident from these spatial strategy options that they are all housing and settlement focused, and that no reference has been made to take into account the location of jobs and benefits of aligning employment growth with housing provision to reduce the need to travel and achieve the most sustainable spatial strategy. As noted elsewhere within these representations the A14, and Bury St Edmunds in particular, is the main employment centre in West Suffolk and this is expected to continue. New Anglia LEP for example, continue to support sites along the A14 corridor, and are currently working to draw further investment along this key transport corridor to secure growth in housing, jobs and overall economic output. Furthermore, Haverhill is considered to be the commensurate settlement within the former Forest Heath area to Bury St Edmunds. It has a good range of facilities and services and provides the opportunity to accommodate sustainable housing and employment growth within this part of the District. The Review of Housing Need undertaken by Pegasus indicates that the former St Edmundsbury, now West Suffolk, has seen its labour market grow by 15,000 jobs while the number of working residents has notably reduced. This has led to deficit of workers in the former St Edmundsbury, and requires a substantial inflow of workers from other areas to sustain it. This has encouraged unsustainable commuting patterns from outside the District, and has put pressure on the housing market. In order to best achieve sustainable growth within West Suffolk, and reduce commuting, the spatial strategy needs to align jobs with housing. In the case of West Suffolk, transport infrastructure has not been used to guide spatial development. The four options presented in the SA do not do so, and it is thus contrary to paragraph 102 of the National Planning Policy Framework (NPPF) which states: Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: * a) the potential impacts of development on transport networks can be addressed; * b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised - for example in relation to the scale, location or density of development that can be accommodated; * c) opportunities to promote walking, cycling and public transport use are identified and pursued; * d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account - including appropriate opportunities for</p>

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			<p>avoiding and mitigating any adverse effects, and for net environmental gains; and * e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. Paragraph 103 of the NPPF states that: Theplanning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making. Pigeon also note that the first two strategic objectives of the Local Plan are: * SO1: Support the local economy of West Suffolk by ensuring an adequate supply of land is available to accommodate a range of local businesses and startups * SO2: Ensure adequate infrastructure is provided to support new growth and that communities are both physically and digitally well connected To ensure that the SA is sound and complies with the NPPF, Pigeon believe that transport infrastructure and sustainable transportation should be considered within the spatial distribution options. The benefits of Transport Corridors and the A14 There are several environmental, social and economic benefits of directing development around transport corridors. For example, strong and growing employment sectors such as logistics will strongly favour sites with good access to strategic transport routes. This cuts costs in terms of fuel and transport times and also has environmental benefits in terms of a reduction in emissions to air. Swift economic development which occurs as a result of growth around transport corridors also results in strong housing demand as jobs attract skills and labour and vice versa. There is therefore an opportunity to also direct housing growth to these key transport corridors in order to benefit from close proximity to jobs which in turn reduces vehicle miles through corresponding reductions in vehicle emissions. Co-locating employment and housing growth also allows the promotion of sustainable modes of travel that enables new residents to cycle, walk or use public transport to commute or access key services and facilities. Within West Suffolk, and the wider Cambridge sub-region, the A14 is the key strategic transport corridor within the midlands and crosses West Suffolk through Bury St Edmunds, Ipswich and connects the Port of Felixstowe[1] (#_ftn1) . The Port is one of the most important economic assets within the UK</p>

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			<p>and which has the following characteristics: 1) It is a globally significant deep water port which provides the best location in Britain for important and exporting goods 2) It is the largest container port in the UK handling circa 37% of all containers in 2018[2] (#_ftn2) 3) It is multi-modal in nature with strong road, rail and sea access and connectivity 4) 70% of the containers arriving in Felixstowe are transported to the 'Midlands Golden Triangle' and the economic and manufacturing areas of Birmingham, Coventry, Leicester and Nottingham For the reasons identified above, it is evident that the A14 and freight traffic moving between Felixstowe and the Midlands will remain a key driver of economic growth within West Suffolk for the life of the plan period. This is noted and supported by the SA which states[3] (#_ftn3) West Suffolk DC must also cooperate with neighbouring areas in respect of 'larger than local' considerations, including capitalising on growth opportunities associated with Cambridge and along key transport corridors (notably the A11 and A14), and also in respect of addressing the impacts of growth, including relating to transport, energy supply, water resources, health services and education provision The importance of the A14 as a driver of employment and economic growth is also recognised by the SA in several locations including Section 9 which provides the results of the spatial options appraisal against the SA Framework. Pigeon have identified the following comments of relevance to these representations: * Air and Environmental Quality SA Objective: Appraisal text states: however, available sites in the SHELAA indicate potential options exist near Bury St Edmunds and along the A14 between Bury St Edmunds and Newmarket, where development would not be significantly affected by noise impacts associated with airbases * Biodiversity SA objective: Large-scale growth around Bury St Edmunds (avoiding the north-west) has good potential to avoid significant negative effects arising in relation to internationally designated biodiversity sites, however growth along the A14 corridor has greater potential to affect designated Breckland SPA habitats. The large-scale of development is however considered for economies of scale and a significant potential to deliver strategic mitigation such as SANGs to alleviate both existing and additional recreational pressures on the SPA * Climate Change Adaptation SA objective: available sites indicate potential opportunities for growth at this scale near Bury St Edmunds and along the A14 between Bury St Edmunds and Newmarket. There should be good potential to avoid flood risk at these locations * Transport SA Objective -. By focusing most growth in Towns and Key Service Centres, Option 2</p>

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			<p>provides more future residents with access to rail services and existing sustainable transport connections, and higher degrees of self-containment, performing well in this respect. However, it is also noted that significant growth in these areas may place additional pressure on existing infrastructure capacity, and lead to negative effects in relation to congestion and travel times without appropriate mitigation Development along the A14 is also supported by New Anglia LEP, who have supported sites including Gateway 14 on the A14 corridor for warehousing and logistics spaces. New Anglia LEP is working to secure further road improvements along key transport corridors including the A14, drawing in further investment and contributing to the growth in jobs, housing and economic output. Beyond the boundary of West Suffolk, the A14 follows the Ipswich - Kennett train line, which passes through locations including Stowmarket and Bury St Edmunds. As well as focussing development around the A14 transport corridor to drive employment and housing, the train line offers a sustainable mode of transport in proximity to the A14, which could be utilised by future employees and residents. Pigeon are aware that the A11 also forms a major transport corridor within West Suffolk however this does not have the strategic economic importance of the A14 given that the A11 does not have link to a major European port as the A14 does with Felixstowe, and there is no parallel railway line, like the A14 does. As such, Pigeon believe that this should not form a major part of any distribution strategy. In conclusion Pigeon firmly believe that there is sufficient evidence to demonstrate that locating development along the A14 transport corridor within and in proximity to Bury St Edmonds is a viable and sustainable reasonable alternative and therefore worthy of inclusion and assessment within the next iteration of the SA. Pigeon believe there are many advantages of considering this reasonable alternative because: * It has the potential to stimulate rapid economic growth given the significance of the A14 corridor to all aspects of the economy * The A14 has been subject to significant investment and therefore represents a strong existing transport network * The Ipswich- Kennet train line runs close to the A14 corridor thereby proving a highly sustainable transport mode for homes and businesses that locate there * Co-locating housing close to employment land can lead to significant reductions in private car use as employees adopt more sustainable modes of transportation for daily commuting Should aspects of this reasonable alternative prove to provide a range of sustainability benefits then it could support a preferred 'hybrid version' of a spatial strategy.</p>

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			For example, there could be merit in combining the transport corridor with Option 1 (new settlement) as that would focus development of a new settlement around the A14 corridor in places such as Bury St Edmunds which would reduce the infrastructure required for a new settlement thereby enhancing its viability and deliverability. [1] (#_ftnref1) https://www.portoffelixstowe.co.uk/ [2] (#_ftnref2) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/826446/port-freight-statistics-2018.pdf [3] (#_ftnref3) https://westsuffolk.inconsult.uk/gf2.ti/-/1173410/82042309.1/PDF/-/6._Sustainability_Appraisal.pdf . Paragraph 2.3.3
Matthew Axton (West Suffolk Council)		Section 3 - what is the scope of the SA?	Table 3.1 - The SA Framework. Soils and other natural resources - There is no mention here of contaminated land. I suggest that where you have the sentence "... development which makes effective use of previously developed land." that it is followed by... "subject to appropriate remediation of any soil or groundwater contamination".
Ms Deborah Cross		Section 8 - site options appraisal	The Sustainability Appraisal notes its limitations are significant (para 8.2.4). If I have understood it correctly, the appraisal has been a desk top exercise rather than involving any real-life inspection. For a number of criteria it does not look at the quality of the facility involved or its capacity to cope with development (eg school, health facility, village hall). This is something that the Sustainable Settlements Study seeks, but fails, to do (see section E below).
Mr Richard Hack (Natural England)		Section 8 - site options appraisal	SAC - We would recommend that it is noted that SHELAA sites within Newmarket and Exning are close to the Devil's Dyke SAC which is at risk from recreational pressures. SSSI - we would advise that where a SSSI is a component part of either a SAC or SPA that the SSSI is categorised on the same red-amber-green scale as its parent SAC or SPA. Natural England is unable to provide any detailed comments on the preliminary findings of the SA. We will be pleased to provide further comment as the detailed SA emerges, through preparation of the Local Plan and evidence documents. The evidence should be used to guide the most sustainable locations for development, prioritising avoidance of impacts to the natural environment including recreational pressure, air quality and water. We would also expect this to identify opportunities for development to implement significant enhancements to the ecological network. The delivery of enhancements should be secured through the relevant

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			allocation and biodiversity policies.
Matthew Axton (West Suffolk Council)		Section 8 - site options appraisal	8.3.6 - Air Quality Management Area (AQMA) - The assessment of impact on air quality appears to have been based purely on the distance to a declared AQMA. This is a blunt, not very nuanced method of assessing the impact of a development on local air quality. Firstly, two of the declared AQMAs that have been used in this assessment are no longer in exceedance of the national air quality objectives (based on 2019 data) and the process of revoking Newmarket AQMA will commence soon. AQMAs in West Suffolk are also very small areas caused by particular, very localised conditions and are not necessarily representative of the condition of the whole town or local area that they are in. Mildenhall, Brandon and Haverhill do not have any AQMAs but do all still have areas where air quality is considered an issue by the local populations and can be considered comparable to levels within AQMAs. However, levels of pollution in these towns has never quite been significant enough to mean that an AQMA was declared. Ranking all the sites in these three towns as 'Green' in terms of air quality is not appropriate. I also note that in the site assessments there is no consideration of a particular sites impact on an AQMA. As an example site WS048 (South East Bury St Edmunds) is ranked as 'Red' as it is close to an AQMA. However, the development will provide a relief road that will actually improve the air quality in the AQMA that it is close to. It will also be relatively close to the town centre and will therefore offer good sustainable travel links to both the town centre and the business areas on Moreton Hall so will be much more positive than a development away from the town where there will be a higher reliance on single occupancy cars. Ranking the site as 'Red' in terms of air quality isn't accurate and is an example of how simply measuring the distance to the nearest AQMA doesn't work as a viable assessment for air quality impact.
. . (The Underwood family and Hill Residential Limited)	Colin Campbell (Hill Residential Limited)	Section 8 - site options appraisal	The findings of the SA are simply sweeping assumptions and not evidence based. The suggestion that a standalone New Settlement is better from an Air Quality perspective cannot be substantiated - it would depend on where it is located and the measures put in place to ensure it does not simply become a car borne commuting dormitory. Similarly, there is no evidence to suggest that such a settlement would perform well in terms of biodiversity, nor to support the assertion that Option 4 performs the worst in terms of biodiversity. With regards flood risk, policy requires all developments to ensure there is no increased risk of

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			<p>flooding off-site and that the development itself is not at risk of flooding. Application of policy means all development should achieve this and therefore all options should perform equally against flood risk. Sweeping assumptions are made about the new settlement option with regards climate change mitigation. The fact that the options appear to be all located close to the A14 simply suggests they will be attractive to car borne commuters. We do not agree with the scoring in relation to “communities”. A freestanding new settlement would not have any identity or sense of community at the outset. That could take many years to create. Existing settlements already have a sense of community and it is far easier to integrate smaller scale developments into the community fabric. It is surprising that the SA identifies equal effects on the landscape from a new settlement and all options. A new freestanding new settlement would have a significant impact on the landscape, much more so than organic additions to existing settlements The scoring on soils and natural resources is not consistent with the commentary. That suggests that a more organic approach to growth would have a much lesser effect than Option 1. The scoring for Water impact is also inconsistent. Policy will require that all developments meet the same standards and all options should score equally.</p>
Colin Campbell (Hill Residential Limited)		Section 9 - distribution options appraisal	<p>The findings of the SA are simply sweeping assumptions and not evidence based. The suggestion that a standalone New Settlement is better from an Air Quality perspective cannot be substantiated - it would depend on where it is located and the measures put in place to ensure it does not simply become a car borne commuting dormitory. Similarly, there is no evidence to suggest that such a settlement would perform well in terms of biodiversity, nor to support the assertion that Option 4 performs the worst in terms of biodiversity. With regards flood risk, policy requires all developments to ensure there is no increased risk of flooding off-site and that the development itself is not at risk of flooding. Application of policy means all development should achieve this and therefore all options should perform equally against flood risk. Sweeping assumptions are made about the new settlement option with regards climate change mitigation. The fact that the options appear to be all located close to the A14 simply suggests they will be attractive to car borne commuters. We do not agree with the scoring in relation to “communities”. A freestanding new settlement would not have any identity or sense of community at the outset. That could take many years to</p>

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Ms Deborah Cross		Section 9 - distribution options appraisal	In para 9.3.1 it refers to additional pressure on infrastructure and congestion affecting air quality in a few specified settlements including Hundon (under Option 3). This is not referred to in WSLP Part 3 para 4.9. The Sustainability Appraisal says in two places that a new railway station is unlikely to be delivered (pages 31 and 37) but gives no evidence for this. It does not address the possibility of expanding one of the existing railway stations noted in WSLP part 2 para 5.4. and siting a new settlement nearby, with good footpath and cycle path access to the station. I note that the Sustainability Appraisal summary appears to support Options 1 and 2, with Options 3 and 4 “performing poorly” in comparison. Note the references to the Sustainability Appraisal in earlier and later sections of this document, where I have tied them in to my comments on the WSLP and the Sustainable Settlements Study. The document is attached to my comment on Part 1.1 WSLP, which I would like you to look at. Search for Sustainability Appraisal.
Mr Andrew Fillmore (Pigeon Invement Management Ltd)	Ms Sophie Pain (Turley)	Section 9 - distribution options appraisal	9.3.1 The importance of the A14 as a driver of employment and economic growth is also recognised by the SA in several locations including Section 9 which provides the results of the spatial options appraisal against the SA Framework. Pigeon have identified the following comments of relevance to these representations: * Air and Environmental Quality SA Objective: Appraisal text states: however, available sites in the SHELAA indicate potential options exist near Bury St Edmunds and along the A14 between Bury St Edmunds and Newmarket, where development would not be significantly affected by noise impacts associated with airbases * Biodiversity SA objective: Large-scale growth around Bury St Edmunds (avoiding the north-west) has good potential to avoid significant negative effects

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John Derry		Section 9 - distribution options appraisal	Appraisal Summary - agreed that options 1&2 reduce negative impacts and provide solutions to most issues.
. . (The Underwood family and Hill Residential Limited)	Colin Campbell (Hill Residential Limited)	Section 9 - distribution options appraisal	<p>The findings of the SA are simply sweeping assumptions and not evidence based. The suggestion that a standalone New Settlement is better from an Air Quality perspective cannot be substantiated - it would depend on where it is located and the measures put in place to ensure it does not simply become a car borne commuting dormitory. Similarly, there is no evidence to suggest that such a settlement would perform well in terms of biodiversity, nor to support the assertion that Option 4 performs the worst in terms of biodiversity. With regards flood risk, policy requires all developments to ensure there is no increased risk of flooding off-site and that the development itself is not at risk of flooding. Application of policy means all development should achieve this and therefore all options should perform equally against flood risk. Sweeping assumptions are made about the new settlement option with regards climate change mitigation. The fact that the options appear to be all located close to the A14 simply suggests they will be attractive to car borne commuters. We do not agree with the scoring in relation to "communities". A freestanding new settlement would</p>

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<p>.. (Newmarket Horsemen's Group)</p>	<p>Nicky Parsons (Pegasus Group)</p>	<p>Section 9 - distribution options appraisal</p>	<p>Chapter 9 of the document provides an appraisal of the distribution options. The absence of the HRI as a constraint means that the results summarised at the end of this chapter give rise to the potential for significant and detrimental impacts on the industry. These impacts warrant appraisal and assessment before settling on a distribution option in the Plan. The NHG requests that this is addressed in future iterations of the SA and is built into the consideration of the alternative options for distribution. The summary of economic impacts associated with the options is identified at page 34. The NHG notes that this is silent about the consequences of development on the HRI and that the impacts are not differentiated across the various towns although there is a general recognition of the importance of the HRI in several respects. This is a significant oversight as it does not allow for the implications on Newmarket and the HRI to be considered in the option selection process. This is significant when considering development in not only the towns but also the location of a new settlement, which elsewhere in the document is identified as possibly being somewhere along the A14 corridor between Newmarket and Bury St Edmunds. The scoping report for the SA notes the importance of the HRI to the character of the rural landscape yet the landscape section of the SA of the options does not reference this as a consideration. This highlights the shortcomings of grouping towns into one single option and the absence of a broad location for the new settlement option. The NHG requests that the options are expanded to include options that consider the consequences of the constraints on housing growth in Newmarket created by the need to protect the HRI. The NHG offers its assistance</p>

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			<p>in identifying how these constraints operate and the factors to be considered. The SA also considers the site options that have come from the Strategic Housing and Economic Availability Assessment. Chapter 8 provides a summary of the appraisal of the site options and confirms at paragraph 8.2.1 that 'the method involves examining the spatial relationship (i.e. proximity / intersect) between all included SHELAA sites and a range of constraint features (e.g. flood zones) and opportunity features (e.g. s GP surgery) for which data is available in digitally mapped form for the District as a whole.' The NHG notes that the subsequent assessment does not consider proximity to the HRI as a constraint and considers that this is an error that must be completed in future iterations of the SA work and site assessment. The adopted plan readily accepts the importance of the HRI to the economic and environmental qualities of the District. It includes policies that offer some protection in this regard. The Regulation 18 documents also acknowledge this and the scoping report for the SA identifies the importance of the HRI to the landscape character of the area. The absence of this as a key criteria risks undermining wider strategies within the Plan that relate to economic and environmental matters. This is especially important given the acknowledgment in Part 3 of the Regulation 18 version of the Local Plan that Newmarket is significantly constrained by the HRI (paragraph 2.5.6).</p>
Colin Campbell (Hill Residential Limited)		Section 10 - plan finalisation	Next steps - future iterations of the SA need to be evidence-based rather than being based on sweeping assumptions and generalisations.
. . (The Underwood family and Hill Residential Limited)	Colin Campbell (Hill Residential Limited)	Section 10 - plan finalisation	Next steps - future iterations of the SA need to be evidence-based rather than being based on sweeping assumptions and generalisations.
Mr Andrew	Ms Sophie	Appendix II:	Section 8 and Appendix II of the SA present the methodology and results of a Geographical

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Fillmore (Pigeon Invement Management Ltd)	Pain (Turley)	GIS site options appraisal	Information Systems (GIS) based assessment (Table B) of all potential residential and employment allocations within the SHELAA. The SA states that this information will support the next iteration of the Local Plan (Regulation 18) to identify the most sustainable sites for potential allocation. As stated in these representations, Pigeon have a number of land interests in the region which are listed in para 1.3 of these representations. A delivery document has been prepared for each of these sites utilising site specific information which is more detailed and accurate than that used within the GIS assessment. Whilst Pigeon broadly support the use of the GIS assessment we would urge the council to consider the following issues: * West Suffolk is largely a rural area and the distances used within the GIS assessment to identify key services and facilities are not appropriate for some of the rural locations; and * Many of the constraints identified via this assessment can be mitigated through the creation of a well-designed masterplan and/ or the provision of key services and facilities such as a school, retail or health services. Given the above Pigeon believe that the Council must utilise the delivery and site specific information provided by Pigeon to assess the true sustainability of a site mitigation utilising planning judgement. Given the available of site specific information, Pigeon have assessed the results of each of their sites within Table B and summarised their performance along with any information that is available to mitigate against any specific sustainability impact. This information is presented in Table 1 of the full representations that have been submitted against paragraphs 1.18 and 1.19 of Part 1 of the Issues and Options Consultation (Developing a Spatial Strategy). Please refer to these full representations which have been uploaded in that location, given the difficulty with using this form. Pigeon have also included an assessment of these sites that have not been included within the GIS appraisal in order to demonstrate their strong sustainability performance to the Council. Pigeon would urge the Council to consider these sites as part of the next appraisal process.

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