

# SUNNICA ENERGY FARM

EN010106

Volume 8

8.10 Horse Racing Industry Impact Assessment

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010



Planning Act 2008

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# Sunnica Energy Farm

## Horse Racing Industry Impact Assessment

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# **Sunnica Energy Farm Horse Racing Industry Impact Assessment**

Sunnica Ltd  
November 2022

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## 1.0 Introduction

- 1.1 This report has been prepared on behalf of Sunnica Ltd in relation to Sunnica Energy Farm (“the scheme”); a proposed solar farm just north of Newmarket. The application site straddles the local authority areas of West Suffolk and East Cambridgeshire. A Development Consent Order (DCO) application for Sunnica Energy Farm was made to the Planning Inspectorate (PINS) on 18<sup>th</sup> November 2021 and accepted for examination on 16<sup>th</sup> December 2021.
- 1.2 This report deals with issues raised in respect of the alleged impact of the scheme on the horse racing industry (HRI) in Newmarket

## About the authors

- 1.3 This report has been prepared by Lichfields, an independent planning and development consultancy. Lichfields has been established for 60 years and has one of the largest professional planning teams in the UK.
- 1.4 Matthew Spry is the Senior Director at Lichfields who oversaw preparation of the report. Matthew has held that position since 2008, and is now Head of the 100-strong London office of the company. Matthew has 25 years’ post-qualification experience in planning, economics and regeneration. He holds a First Class Honours Bachelor of Science Degree in City and Regional Planning and a Diploma in Town Planning, both from University of Cardiff. He is a Member of the Royal Town Planning Institute (RTPI), and of the Institute of Economic Development (IED) and a Fellow of both the Royal Society of Arts (RSA) and of the Academy of Social Sciences (AcSS).
- 1.5 Of direct relevance to the preparation of this report, Matthew gave professional expert witness evidence at the two public inquiries (in 2015 and 2019) that considered the called-in proposals by Lord Derby for, inter alia, 400 homes at Hatchfield Farm in Newmarket, where the impact on the horse racing industry was an important policy consideration in determination of the scheme. Matthew’s evidence specifically considered whether or not that proposal would adversely impact the HRI. The Secretary of State granted permission for Hatchfield Farm in 2020.
- 1.6 Matthew was supported in preparation of the report by Pippa Nisbett (Planning Director), Bethan Haynes (Associate Director) and Harry Bennett (Senior Planner) - all Chartered Town Planners - who in combination have extensive experience in the assembly and interpretation of socio-economic evidence in a planning context, including in respect of the HRI in Newmarket.

## Newmarket and the horse racing industry

- 1.7 Newmarket is the nearest large settlement to the Sunnica Energy Farm. It is located to the south, opposite the site boundary for Sunnica West, and separated by the A14. Newmarket is widely regarded as the home of flat racing in the UK. This is due to its history which dates back to the early 16<sup>th</sup> century. It is a focal centre for flat horse racing in the UK. It has the largest concentration of training, racing, sales and breeding, as well as ancillary services, in the UK and is recognised internationally. The unique configuration of its training yards

within and around the town means that horses move across the town to train giving visibility to horses, activity and use of the gallops.

- 1.8 The Limekiln Gallops (owned and operated by the Jockey Club) are located east of Newmarket at a distance of approximately 50m from Sunnica West Site A (being on opposing sides of the A14). Sunnica West Site A is located in closer proximity to Snailwell Gallops, with a small local track and vegetation separating the Sunnica site from these gallops.
- 1.9 Since 27<sup>th</sup> January 2022, representations from the wider HRI at Newmarket were made to PINS which object to the Sunnica proposal on a number of grounds.

**What are the primary objections to the scheme from the horse racing industry, insofar as they relate to economic impact?**

- 1.10 Representatives both directly from the HRI and those speaking on behalf of the HRI have set out a number of specific objections to the Sunnica scheme. These primarily include Tattersalls, The Jockey Club and Say No To Sunnica (SNTS). The primary purported adverse effect of the scheme is its landscape/visual impacts; particularly from views from within the Limekilns Gallops. Other objections raised from the HRI, which indirectly relate to economic impact, include:
- The impact of glint and glare from the solar panels on nearby gallops, impacting the training of horses;
  - Increased levels of traffic, particularly during construction, raising the risk of endangering horses;
  - Increased levels of noise scaring nearby horses; and
  - The overall change in nature of the area from a rural to an ‘industrial’ landscape, affecting Newmarket’s overall attractiveness as a location to train horses, including a knock on impact on its Investors.
- 1.11 It is alleged that these impacts would cumulatively harm the owner and visitor experience at Newmarket. The concern is that it would therefore become a less attractive location for equine-related investment, which would presumably shift to elsewhere in the United Kingdom or internationally. This would – it is argued - not only damage the longer-term viability of the horse racing industry cluster in Newmarket, but also have knock on effects for supporting industries given the town’s economy is primarily reliant on horse-related activities. For example, it is argued that if the horse racing industry declines, then the supporting local tourism industry (i.e. hotels) would also suffer. Taken together, the suggestion being made is that it would threaten Newmarket’s primacy both within the United Kingdom and worldwide as one of the preferred locations for the breeding and training of thoroughbred flat racehorses.
- 1.12 It is important to highlight the representations made by Ashtons Legal on behalf of Godolphin Management Company, which object to the scheme on the basis of a number of points noted above (noise, changing nature of the landscape, risk of horses using gallops being spooked, etc). The representations note that the Sunnica West Site is immediately adjacent to the Snailwell Gallops, and allege a potentially negative impact on horses using these gallops as a result of the scheme. However, these representations state that Godolphin



is “the biggest international investor in Newmarket and continues to operate here because of the world class nature of the facilities within the economic cluster it has become” and concludes by stating that “if [Sunnica] has to proceed, the planting and construction constraints listed above must be implemented.”

- 1.13 In short, the biggest international investor in Newmarket – which operates gallops directly adjacent to the Sunnica West Site A – does not claim that it will leave Newmarket or reduce its investment if the scheme goes ahead. Instead, it is using its representations to highlight the importance of ensuring that the proposed mitigation and management measures – such as undertaking construction works after 10am (when use of the gallops has finished) and additional planting to help ensure there are no views from the Snailwell Gallops into the site – are implemented. This is a fundamentally different position to the representations made by other representors of the HRI, including the Jockey Club, which assert that the scheme will have a “harmful and disruptive impact upon the major established equine industry of the area, one of not merely national but of international importance. None of this will be compensated for, the mitigation will be wholly inadequate...”

## Purpose of report

- 1.14 In the context of the above, the purpose of this report is to respond with an objective assessment of the specific objections to the scheme from the wider HRI in Newmarket. The report considers whether there is any evidence that the scheme will likely impact the long-term viability of the HRI in Newmarket as a whole (or whether it will impact on any specific HRI site within Newmarket). This is carried out within an assessment framework which takes account of relevant local planning policy and planning precedent.
- 1.15 The report should therefore be read alongside other material submitted as part of the examination.

## Report structure

- 1.16 This report is set out as follows:
- **Section 2.0 Policy Background** – this sets out the relevant planning framework against which the application should be determined, identifying the wider matters to be taken into consideration. This provides the framework for assessing the impact of the scheme on the HRI;
  - **Section 3.0 Performance and Growth of the Horse Racing Industry in Newmarket** – this sets out the context and historic growth of Newmarket as a location for horse breeding and training. It also assesses its current relative strength nationally and internationally;
  - **Section 4.0 The Impact of Solar Farm Developments on the Horse Racing Industry** – this section sets out a review of how the potential impacts of solar farms on the horse racing industry have been considered in the planning process elsewhere in England;
  - **Section 5.0 Assessed Impacts of the Sunnica Scheme on factors relevant to the HRI** – this section draws upon technical evidence and the EIA to highlight what

the assessed impacts of the scheme would be on factors that are relevant to the operation and long-term viability of the HRI;

- **Section 6.0 To What Degree Will These Impacts Harm the Horse Racing Industry in Newmarket?** – this section assesses the scheme’s impact on the HRI and an assessment of the scheme; and
- **Section 7.0 Summary and Conclusions.**

## 2.0 Policy Background

### The Planning Act 2008

- 2.1 The Planning Act 2008 (PA 2008) was introduced to streamline the decision-making process for major infrastructure projects. The PA 2008 created a development consent regime for major infrastructure projects in the fields of energy, transport, water, waste water, and waste. In this case a solar energy farm is categorised under Section 14(1)(a) which includes the construction or extension of a generating station and Section 15(2) as it meets all of the criteria under this subsection which includes:
- (a) it is in England,
  - (aa) it does not generate electricity from wind,
  - (b) it is not an offshore generating station, and
  - (c) its capacity is more than 50 megawatts.
- 2.2 The PA 2008 stipulates that the Secretary of State (SofS) is responsible for determining an application for development consent, with the power to appoint an ‘Examining Authority’ to manage and examine the application. In this case, it is the SofS for Business, Energy and Industrial Strategy and under Sections 61 and 65 of the PA 2008 the Planning Inspectorate decided, on behalf of the SofS, that the application should be examined by a Panel of three appointed persons. This Panel will make procedural decisions, examine the application, and make a recommendation to the SofS who will then decide whether to grant a DCO.
- 2.3 Section 104(2) of the PA 2008 refers to decisions in cases where a national policy statement has effect. It requires the SofS to have regard to that National Policy Statement (NPS), amongst other matters, when deciding whether or not to grant a DCO.
- 2.4 NPSs set out the policy basis for Nationally Significant Infrastructure Project (‘NSIP’) developments. There is currently no formal adopted NPS which directly addresses solar energy developments. In this case, there is therefore no specific technology NPS that “has effect” for the scheme and therefore section 104 is not applicable.
- 2.5 Where there is no NPS that “*has effect*” Section 105(2) of the PA 2008 states that the SofS must have regard to:
- (a) any local impact report prepared by the relevant local authorities,
  - (b) any matters prescribed in relation to development of the description to which the application relates, and
  - (c) any other matters which the SofS “*thinks are both important and relevant*” to the SofS’s decision.

### National Policy Statements for Energy

#### EN-1 (Overarching National Policy Statement for Energy), July 2011

- 2.6 Whilst adopted NPS EN-1 does not specifically refer to solar energy development, other than to note that some renewable resources (including solar) are intermittent and cannot

be adjusted to meet demand specifically; this NPS is considered relevant for the purposes of this report (and therefore the SofS's decision). This is because EN-1 is the overarching NPS for Energy and, alongside other technology-specific energy NPSs, it provides the primary basis for decisions by the SofS. It provides, in Part 3, a demonstration that there is a need for new energy infrastructure and in respect of renewable energy section 3.4 sets out that that need is urgent.

- 2.7 Section 5.12 'Socio-economics' of NPS EN-1 is of particular relevance. It sets out that "*The construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels.*" It goes on to state that applicants should describe the existing socio-economic conditions in the areas surrounding the scheme and should also refer to how the development's socio-economic impacts correlate with local planning policies.
- 2.8 At paragraph 5.12.6 it sets out that: "*The IPC [Infrastructure Planning Commission now SofS] should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the IPC considers to be both relevant and important to its decision.*"
- 2.9 It also states, at 5.12.7, that: "*The IPC may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS).*"

#### **Draft EN-1 (Overarching National Policy Statement for Energy), September 2021**

- 2.10 A new draft version of NPS EN-1 discusses the role of wind and solar energy noting these (parag 3.3.21) are "*the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply.*" It also notes within the paragraph that "*a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.*" As part of this the government has announced sustained growth in the capacity of solar, in addition to onshore wind, in the next decade.

#### **Draft EN-3 (National Policy Statement for Renewable Energy Infrastructure), September 2021**

- 2.11 A new draft version of EN-3 (NPS for Renewable Energy Infrastructure) was published September 2021 which specifically includes new detail on solar photovoltaic generation of energy. Of relevance to this report, draft EN-3 includes guidance on a number of impacts, including those raised by members of the HRI.
- 2.12 In relation to landscape, visual and residential amenity, draft EN-3 states that solar farms are noted as potentially having a wider zone of visual influence than other types of onshore energy infrastructure; this is because they are likely to be in low lying areas of good exposure. Whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels, it notes that with effective screening and appropriate land topography the area of a zone of visual influence could be zero. In decision-making, draft EN-3 states that the SofS will consider the visual impact of any proposed solar farm, taking account of any sensitive visual receptors and the effect of the development on landscape character.

2.13 In relation to glint and glare, draft EN-3 notes that:

*“Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes and motorists. (2.52.4)*

*There is no evidence that glint and glare from solar farms interferes in any way with aviation navigation or pilot and aircraft visibility or safety. Therefore, the Secretary of State is unlikely to have to give any weight to claims of aviation interference as a result of glint and glare from solar farms (2.52.5).”*

2.14 In relation to construction traffic (including noise and vibration) draft EN-3 states:

*“Consistent with the generic policy set out in EN-1, the Secretary of State should be satisfied, taking into account the views of the relevant local highway authorities, that if there are abnormal loads proposed, they can be safely transported in a way that minimises inconvenience to other road users and that the environmental effects of this and other construction traffic, after mitigation, are acceptable. (2.54.9)*

*Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent. Therefore, it is very unlikely that traffic or transport impacts from the operational phase of a project would prevent it from being approved by the Secretary of State. (2.54.10)”*

2.15 It is noted that draft EN-3 does not contain any section/guidance on economic impacts because of solar farm development.

## **National Planning Policy Framework, July 2021**

2.16 Chapter 14 of the NPPF addresses the challenges of climate change, flooding and coastal change. Paragraph 152 states, *“the planning system should support the transition to a low carbon future in a changing climate.”* It encourages support of renewable and low carbon energy and associated infrastructure.

2.17 Paragraph 155 notes that, *“To help increase the use and supply of renewable and low carbon energy and heat, plans should:*

*a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*

*b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*

*c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for colocating potential heat customers and suppliers.”*

## Other Considerations – Local Plan Policies

- 2.18 The scheme is a NSIP being determined under section 105 of the PA 2008. This requires that the SofS must have regard to the matters under section 105 (2). In this case, we consider that there are two specific local planning policies capable of being “*important and relevant matters*,” which we set out below.
- 2.19 Consideration of these two policies is also important in the context of EN-1 which states applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development’s socio-economic impacts correlate with local planning policies. In this location, because the HRI is clearly ‘relevant and important’ to the decision, it is appropriate to evaluate how the local planning authorities, which cover the application site, have considered the HRI in their Development Plans.
- 2.20 Sunnica Energy Farm straddles the authority boundaries of East Cambridgeshire and West Suffolk (which comprises the former areas of Forest Heath and St Edmundsbury). Both authorities have policies pertaining to the HRI in their current Local Plans:
- 1 The East Cambridgeshire Local Plan (2015) Policy EMP6 (Development affecting the horse racing industry) states that “*Any development which is likely to have an adverse impact on the operational use of an existing site within the horse racing industry, or which would threaten the long term viability of the horse racing industry as a whole, will not be permitted.*” and;
  - 2 The ‘Forest Heath and St Edmundsbury Joint Local Plan Part 2 DMPD’ (2015) Policy DM48 (Development affecting the horse racing industry) states that “*Any development within or around Newmarket which is likely to have a material adverse impact on the operational use of an existing site within the Horse Racing Industry (such as noise, volume of traffic, loss of paddocks or other open space, access and/or servicing requirements), or which would threaten the long term viability of the horse racing industry as a whole, will not be permitted unless the benefits would significantly outweigh the harm to the horse racing industry*”.
- 2.21 These local policies provide a starting point for the consideration and assessment for town and country planning application development in the context of development that may affect the horse racing industry in each of the spatial plan areas. In East Cambridgeshire the policy will not permit development which fails either of the tests in the policy, and in West Suffolk the policy will not permit development failing the tests unless the benefits significantly outweigh the harm to the HRI. It is important to note that the starting point for any consideration and determination of an NSIP is national policy and not the development plan. Whilst these policies are capable of being important and relevant matters to the SofS decision under S105 of the PA 2008 there is no requirement for the SofS to determine the Application in accordance with them and indeed, NPS EN-1, provides a different threshold than the local plan policies referred to above.
- 2.22 In determining the application under S105 of the PA 2008, our report therefore considers other matters “*which are both important and relevant*” to the Secretary of State’s decision – namely the likely impact on the HRI. In considering the scheme’s potential impact on the HRI, in the context of the policy requirements set out in EMP6 and DM48, we ask the following two key questions:

- 1 Is the scheme likely to have an adverse impact on the operational use of an existing site within the horse racing industry? and/or
- 2 Would the scheme threaten the long-term viability of the horse racing industry as a whole?

2.23 If the answer to both these questions is ‘no’, then one could rationally and reasonably say that the scheme cannot be refused on the basis of other “*important and relevant matters*” relating to the overall interest to protect the HRI in Newmarket.

## Assessing Impacts on the HRI – A Framework

### 1) Specific HRI sites

2.24 To consider whether the Sunnica scheme is likely to cause adverse impacts to a specific HRI site, we combine a range of analysis. This includes our contextual analysis (of the constituent features of the HRI in Newmarket and the industry’s performance in recent years) and a review of how the HRI has been considered in other solar farm schemes. We combine this analysis with the evidence documents submitted as part of the application and examination and to respond to assertions made in the HRI representations about specific sites, notably the Limekiln Gallops.

### 2) The longer-term viability of the HRI as a whole

2.25 To consider whether the Sunnica scheme could threaten the longer-term viability of the HRI as a whole, the planning decisions made in respect of the proposed development at Hatchfield Farm are relevant<sup>1</sup>. In the case of Hatchfield Farm, the Newmarket HRI (represented by the Jockey Club, as well as other individuals) objected to the proposed development primarily due to its potential highways impact and alleged consequential impacts on the HRI. The alleged impacts stemmed a number of perceived factors such as traffic congestion within the town, different journey times for those involved in the HRI, risk to horses at horse crossings and how these (or perceptions of these) could impact on the wider perception of Newmarket by horse owners and on the functioning of the HRI, which - it was alleged - would threaten the longer-term viability of the HRI. This case therefore provides a useful background to understanding whether perceived impact of change or harm, resulting from new development in the area, would be likely to cause a detrimental impact to the HRI in Newmarket.

2.26 Proposals for development at Hatchfield Farm were considered at three public inquiries that considered the impact of development on the HRI. The first was in 2012 in respect of a larger scheme for 1,200 homes (and associated development) which was dismissed<sup>2</sup>. A second smaller scheme of 400 homes (and associated development) was granted permission following two further public inquiries held in 2015 and 2019.

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<sup>1</sup> Hatchfield Farm is a proposed development for up to 400 dwellings plus associated open space (including allotments and areas of habitat enhancement) foul and surface water infrastructure, two accesses onto the A142, internal footpaths, cycle routes and estate roads, in accordance with application ref: DC/13/0408/OUT (APP/H3510/V/14/2222871). The site was undeveloped land on the north side of Newmarket. The scheme was called in and then granted permission by the Secretary of State on 12<sup>th</sup> March 2020 following two public inquiries, the first in 2015 and a second – following a judicial review – in 2019. A key matter considered in determination of the application was the impact of the proposed development on the HRI. An earlier application for 1,200 homes was considered via a planning appeal inquiry in 2011 and dismissed by the Secretary of State in 2012.

<sup>2</sup> But not for reasons related to the HRI

- 2.27 The Inspector of the second public inquiry in 2015 (APP/H3510/V/14/2222871) summarised the key issue as follows:
- “The focus of concern for NHG was the potential impact of increased traffic levels upon the operations of the HRI and the knock-on implications of that, to wit the relocation of owners and trainers to other towns. This concern had two prongs, being considerations of actual harm and a perception that harm could arise.” (IR438)*
- 2.28 The SofS in the 2012 appeal (APP/H3510/A/10/2142030) concluded **“when weighed against the advantages of Newmarket,... the actual traffic conditions are most unlikely to make owners send their horses for training elsewhere and that, if there is no reduction in the number of horses in the town, there would be no effect upon the local economy or upon the historic character of Newmarket”** (SofS Para 14, our emphasis).
- 2.29 In drawing those conclusions, that Inspector (who reported to the SofS in 2011) included the following factors that may be assumed to be the ‘advantages’ of Newmarket for the HRI:
- 1 *“The reputation of Newmarket as possibly the best place in the world to train horses”;*
  - 2 The owners’ *“delight to see their horses traversing the town on their way to and from the gallops”;* and
  - 3 *“The apparent resilience of the industry during the recession” (IR12.4.28).*
- 2.30 These three factors were reflected in the conclusions of the later call-in inquiry Inspector (APP/H3510/V/14/2222871) who noted:
- 1 Newmarket has *“a unique reputation as a centre of international excellence” (IR392);*
  - 2 Racehorses are *“moved around the town from their stables to the training grounds along specially constructed horse walks and the sight of the strings of these fine animals being taken for exercise is a very impressive spectacle” (IR370);* and
  - 3 The HRI is a *“thriving success and has continued to grow in terms of its economic importance despite difficulties in the national economy” (IR392).*
- 2.31 Under each of the above factors, there are individual characteristics which contribute to the overall advantages of Newmarket. For example, the town’s accessibility to airports which have the facilities to transport horses helps it thrive internationally. Its ground surface and the quality of the land (i.e. its gentle topography) also both contribute to its unique reputation.
- 2.32 In our view, the three primary factors set out above remain a helpful basis of assessing whether the Sunnica scheme could impact the longer-term viability of the HRI at Newmarket. For example, would a given scheme result in damage to Newmarket’s reputation as a centre of national and international excellence to train horses or might it block or significantly diminish the spectacle of horses traversing the town or gallops? Has the performance of the HRI changed such that it is less resilient to potential impacts?
- 2.33 If impacts arising from a scheme (either individually or cumulatively) would occur and the HRI was considered to be less resilient (the underlying strength of the HRI despite the recession being one of the three factors that led the Inspector at the 2012 appeal to conclude that owners were unlikely to withdraw their horses from Newmarket), then it might be concluded that the scheme would threaten the longer-term viability of the HRI at



Newmarket. A key measure would be if it were to result in a likely material reduction in the number of trainers or horses in the town as a direct result of the scheme. The converse would also be true, if any adverse impacts of the scheme were concluded not to threaten these factors then there would be no likely harm to the longer-term viability of the HRI.

2.34

In short, to understand whether the scheme would threaten the long-term viability of the industry as a whole (and the questions around which this report is prepared), it is necessary to understand:

- 1 Does the evidence show that Newmarket continues to be one of the internationally-renowned locations for horse training?
- 2 If so, what are the elements that underpin its overall success?
- 3 Is there any evidence that the scheme will impact on any one of these elements? To inform this assessment, we consider how other solar farms have been considered in the planning process to date, particularly near horse racing clusters. This also references other material submitted for examination under DCO, which consider the potential impact on specific HRI sites.
- 4 Based on whether the scheme is likely to impact on any one element which underpins Newmarket's success, what can we conclude in terms of the scheme's impact on the long-term viability of the HRI in Newmarket as a whole?

### 3.0 Performance and Growth of the Horse Racing Industry in Newmarket

- 3.1 This section sets out the context and historic growth of the Horse Racing Industry (HRI) in Newmarket. This looks at contextual information and indicators to consider how Newmarket has performed over the years. It also looks at comparator locations in the United Kingdom which would be available to investors to see how these compare in their growth and offerings. This section also analyses how Newmarket is seen in the context of the wider industry, including Europe and globally.

#### Components of the HRI in Newmarket

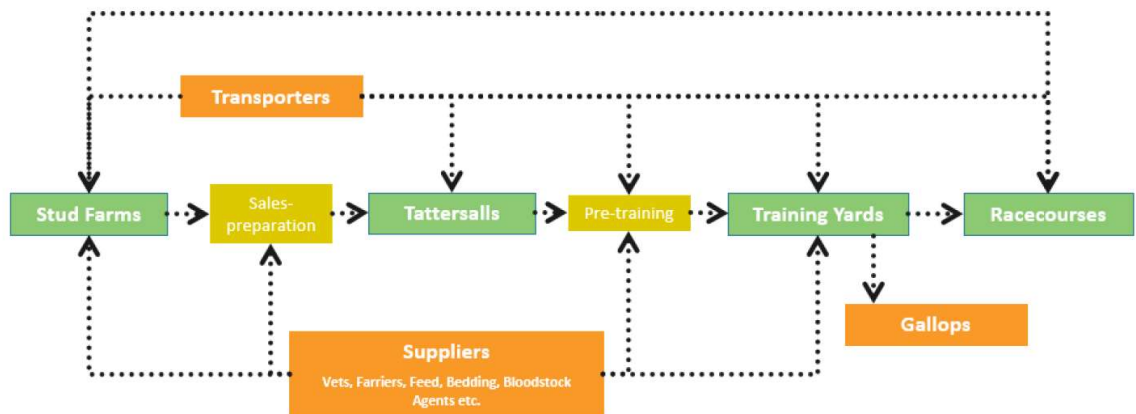
- 3.2 The activities associated with the horseracing industry take place both within the town of Newmarket and within the surrounding areas. The activities directly and indirectly related to the HRI in Newmarket are distributed across a number of the standard industrial sectors – as such, it is difficult to ascertain the precise number of jobs directly related to the horseracing industry in Newmarket, however reports produced by SQW (an independent provider of research, analysis and advice in economic and social development) in 2014 and 2017 indicate that direct HRI jobs account for circa 30% of jobs in Newmarket<sup>3</sup>.
- 3.3 Paragraph 9.1 of the Forest Heath and St Edmundsbury Local Plan DMPD notes that the stronghold of horseracing in Newmarket “*arises from the unique assembly of horse racing interests in the town covering all aspects of the racing industry.*” Representations made by Godolphin to the Sunnica scheme state that Godolphin “*continues to operate here because of the world class nature of the facilities within the economic cluster it has become.*”
- 3.4 The horse racing facilities and their assembly gives the industry a critical mass of infrastructure as well as the concentration of expertise within the town that “*cover all aspects of the industry*” and make it “*unique*”<sup>4</sup>. Newmarket benefits from a large number of training yards and stud farms as well as two racecourses: the Rowley Mile and the July Course. The Newmarket Training Grounds include an array of facilities for training thoroughbred racehorses, comprising of 2,500 acres in total, 50 miles of turf gallops and over 14 miles of artificial tracks. Dedicated horse walks and crossings facilitate the movement of horses between stable and training areas. Tattersalls, the oldest bloodstock auctioneers in the world and the largest in Europe, is also headquartered in Newmarket.
- 3.5 The core HRI activities of bloodstock sales, breeding, training and racing are supported by a range of business providing linked goods and services. These are wide ranging and include, but are not limited to: horseracing institutions, veterinary practices, feed and bedding suppliers, tack and saddlery suppliers, farriers, transporters, bloodstock agents and related professional services.

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<sup>3</sup> SQW estimated this with reference to a survey of HRI employers within the town, comprising trainers, stud farms, horse racing institutions, vets and scientific institutions, horse transports and related tourism, with the estimated employment then compared to ONS figures on total employment within Newmarket.

<sup>4</sup> See paragraph 9.1 of the Joint Development Management DPD

Figure 3.1 Schematic Interrelationship between Components of the HRI in Newmarket



Source: Lichfields Analysis

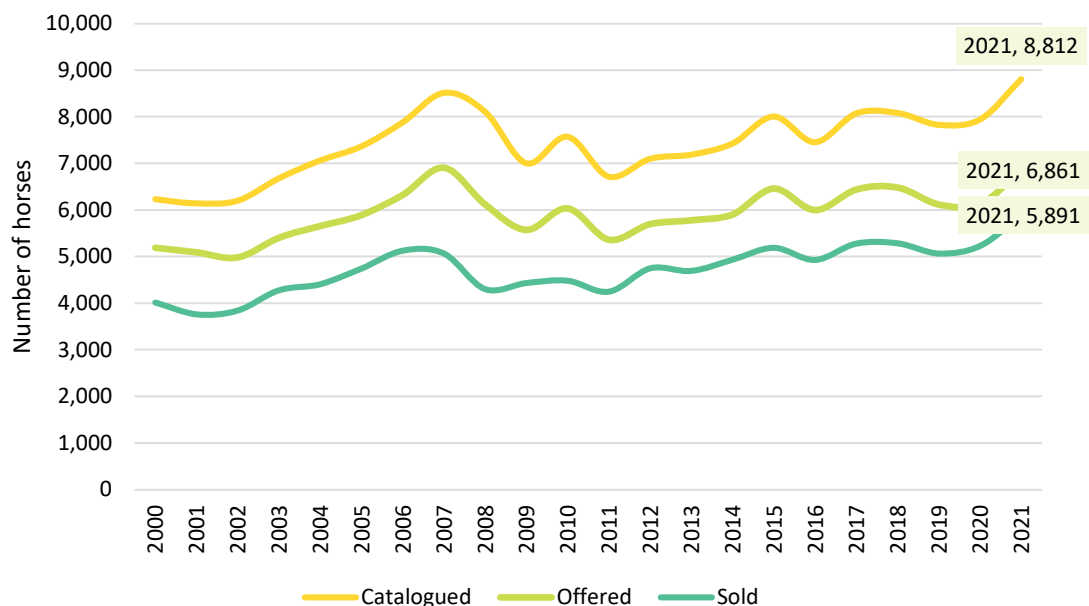
## How is Newmarket's HRI performing?

### Sales

3.6

Tattersalls holds circa nine sales at Newmarket every year. Since a dip following the 2008 recession, sales have increased. Whilst the number of sales in 2020 saw a very slight dip, this is likely a result of lockdowns imposed due to the Covid-19 pandemic. Activity remains strong and in 2021 Tattersalls sold 5,891 horses; one of its best years to date and notably outperforming the pre-recession peak.

Figure 3.2 No. Horses Catalogued, Offered, and Sold at Newmarket



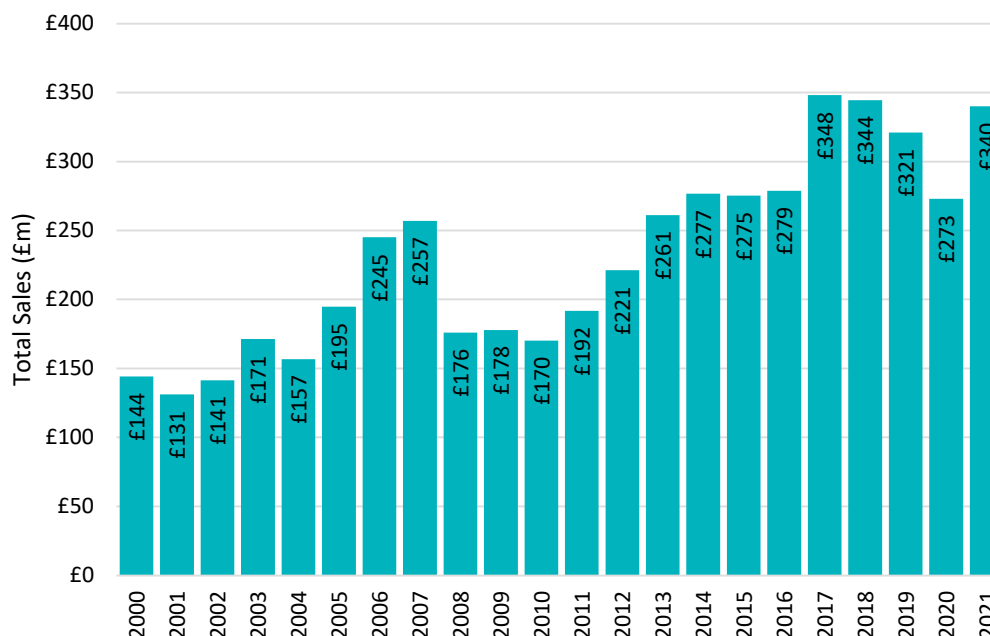
Source: Tattersalls

3.7

Tattersalls publishes its annual sales totals statistics on its website; this data shows that Tattersalls' annual turnover has risen steadily since 2010, with 2017 and 2018 seeing the

two years of highest turnover. Whilst there was a dip down to £273m in 2020 (i.e. the pandemic effected year) this has climbed back up to £340m in 2021, i.e. only just short of the pre-pandemic peak of £348m.

Figure 3.3 Total Sales at Newmarket



Source: Tattersalls (Notes: Figures converted to £ from Guineas using ratio of 1 Guinea = £1.05. Figures do not account for inflation).

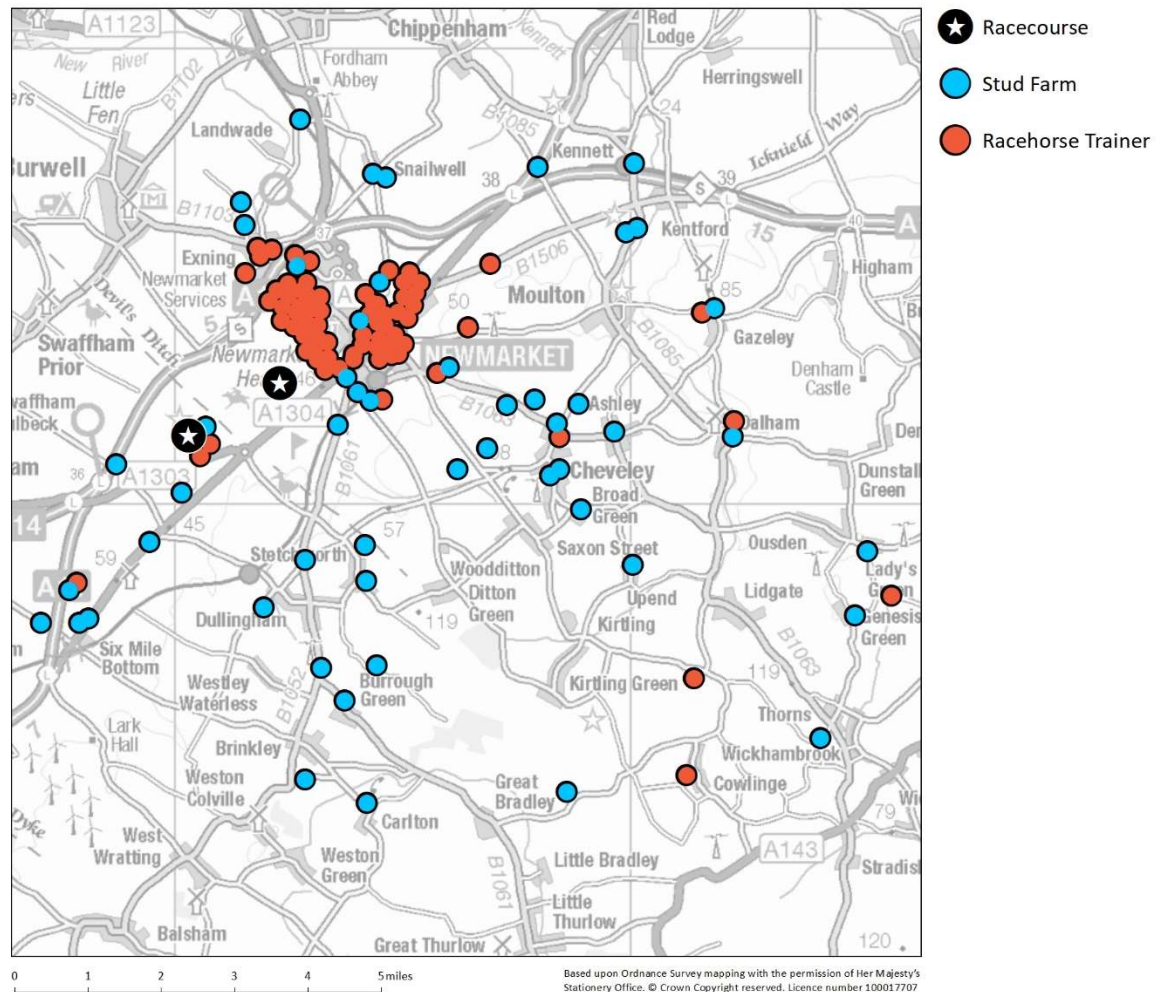
## Stud Farms

- 3.8 Newmarket is firmly established as an international breeding hub<sup>5</sup>. A review of the Directory of the Turf in March 2019 shows that there were 51 stud farms located within the CB8 postcode<sup>6</sup> (i.e. Newmarket and its surrounding area). It is also understood that at this time, out of 51 stallions nationally, 36 of these were based in Newmarket (SQW March 2017 update to Newmarket's Equine Cluster 2014 report).
- 3.9 In Newmarket, the farms are typically located beyond the town centre in surrounding areas where there is more land available. Figure 3.4 below shows the location of stud farms and trainers in/around Newmarket at March 2019. The vast majority of these are located south of Newmarket, south of the A14.

<sup>5</sup> See Para 3.9 of the SQW 2017 Report on the Newmarket's Equine Cluster

<sup>6</sup> There is central definition of the Newmarket HRI cluster, however our analysis suggests that almost all trainers and almost all ancillary HRI services associated with Newmarket are located within the CB8 postcode area. The same geographical area of analysis was considered in the evidence submitted by Lichfields to the Hatchfield Farm inquiry.

Figure 3.4 Location of Stud Farms and Trainers in Newmarket (2019)



Source: Lichfields Analysis of the 'Directory of the Turf' (March 2019)

### Training yards and grounds

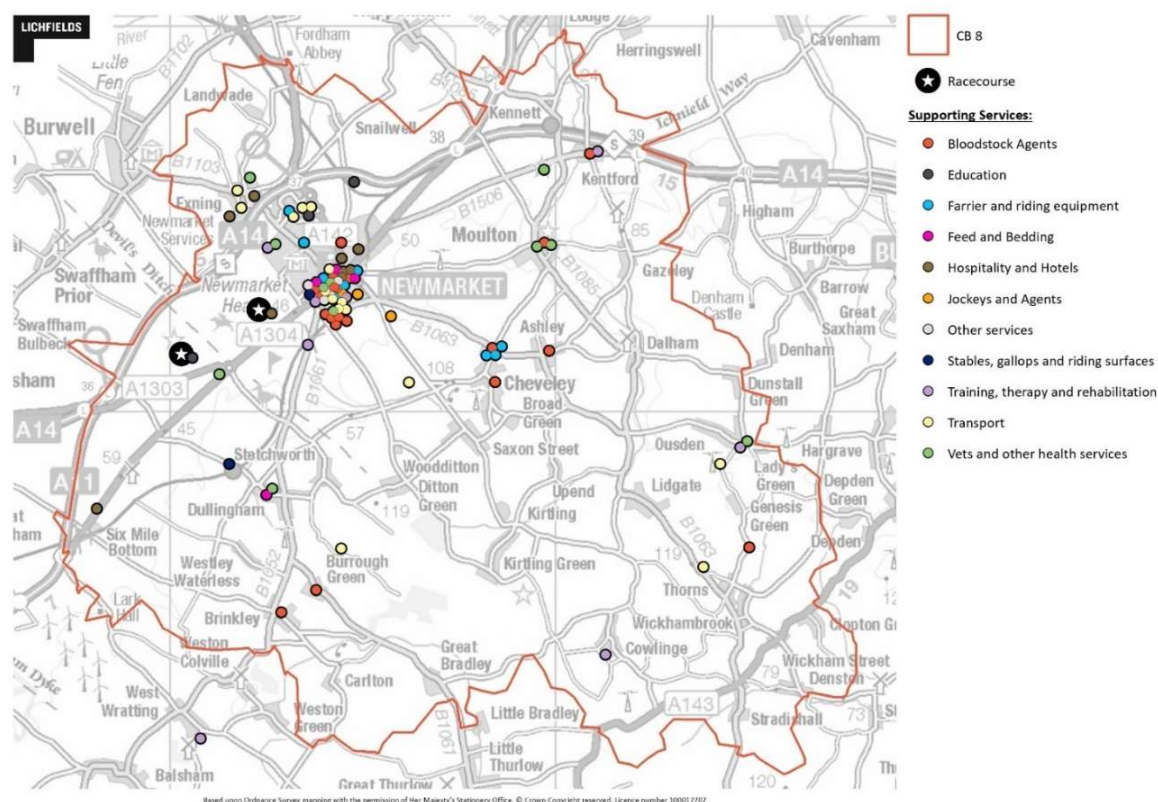
- 3.10 Newmarket is the largest training centre in the UK (based on number of trainers and number of horses in training), and in 2022 31% of the top 100 ranked trainers (Racing Post) in Great Britain were based in Newmarket. According to the Jockey Club website, there are currently approx. 3,000 horses in training in Newmarket (peak season).
- 3.11 Training yards are predominantly concentrated close to the town centre where they are close to Newmarket Training Grounds. While some training yards have their own training facilities, most establishments in the town use the Newmarket Training Grounds.
- 3.12 On its website the Jockey Club sets out the detail on the Newmarket Training Grounds operations and their unique character. The Grounds are open seven days a week all year round, catering for all types of racehorse, at every stage of their career, from yearlings to point-to-pointers.
- 3.13 The 2,500 acres of training grounds are maintained by Heathmen split into two teams, one team on Bury Side and one on Racecourse Side.

- 3.14 There are now over 14 miles of gallops and canters on artificial surfaces, each varying in surface, length or gradient. The introduction and expansion of artificial surfaces has allowed the training grounds to accommodate more horses as well as reducing the reliance on turf gallops, thereby improving their condition when used.
- 3.15 No stretch of the turf gallops is used for more than one day in any year, and much is used only once every two years. Fresh ground is provided each day as appropriate. The quality of the turf is carefully protected, and gallops are closed if conditions are unsuitable. Gallops are used in the mornings; Godolphin's representation states that its gallops are in use up until 10am each day.
- 3.16 The Newmarket Training Grounds also have National Hunt schooling facilities. These are located at The Links and include steeplechase fences and hurdles on turf, as well as an all-weather schooling strip and access to The Links grass gallops.

### Supporting activities

- 3.17 The breeding and training activities in Newmarket are supported by an extensive range of goods and services which fall into a range of sectors from agriculture to professional services; many of which are leaders in their fields. A study of their indicative location (based on postcode sector) was undertaken by Lichfields in March 2019 and is shown in Figure 3.5 below.

Figure 3.5 Ancillary services in the Newmarket HRI cluster



Source: Lichfields analysis of the Directory of the Turf (March 2019)

- 3.18 A number of associations and institutions which provide training, administration and welfare services to the horseracing industry are all located in Newmarket. This includes:



The Jockey Club Estates, British Horseracing Education and Standards Trust, International Racing Bureau, Thoroughbred Breeders Association, a number of leading bloodstock agencies, Racing Welfare, and the Injured Jockeys Company.

- 3.19 The Jockey Club, the first governing body for horseracing in Britain, also has a presence in Newmarket dating back to the 1750's. In 2006, the role of regulating the sport was transferred from The Jockey Club to the British Horseracing authority. The long historic association is part of the explanation for why *“Newmarket is still very much the headquarters of horseracing in the United Kingdom and, arguably, the world, in terms of the breeding, sale and training of thoroughbred (flat) race horses.”*<sup>7</sup>
- 3.20 The town also benefits from a number of leading equine veterinary practices. These include the Rosssdales Veterinary Surgeons and Newmarket Equine Hospital. Rosssdales provides world-class veterinary services to all sectors of the equine market, along with internationally recognised training and development for the profession (Source: [www.Rosssdales.com](http://www.Rosssdales.com)) Newmarket Equine Hospital notes has grown and has a team of over 40 veterinarians working its Newmarket site. It provides veterinary services both in the local area and to clients travelling from further afield.
- 3.21 Finally, based on the 2022 Racehorse Transporters Association (RTA) membership list, there are ten registered racehorse transporters in Newmarket. Newmarket is located close to both Cambridge and Stansted Airports which provide the equine transportation services essential for a global centre of horse racing.

## **Has Newmarket's HRI been subject to a genuine economic 'threat' from growth in competitor locations?**

### **Great Britain**

- 3.22 British Horseracing Authority statistics (August 2022) states there are 497 licenced trainers in Great Britain, shown in Figure 3.6. According to the BHA statistics, the largest training centres in Britain include Newmarket, Lambourn, Malton, Middleham and Epsom. There is also a concentration of trainers near Marlborough in Wiltshire.
- 3.23 These statistics suggest that there are up to 67 trainers currently based in Newmarket. Comparatively, there are approximately 36 trainers based at Lambourn, 26 at Malton, 9 in the Marlborough area, 15 at Middleham and 10 at Epsom. Newmarket therefore accommodates the largest number of trainers and there are nearly double the number of trainers based in the town than the next largest centre, Lambourn.

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<sup>7</sup> As explained in the 2020 Inspector's report to the Hatchfield Farm proposals (IR439)

Figure 3.6 Trainer Locations Across Great Britain



Source: British Horseracing Authority (August 2022)

- 3.24 Analysis of Racing Post Statistics for the top 100 trainers nationally in 2014, 2018 and 2022 shows that Newmarket has retained its position as the top location for trainers within Great Britain. In 2014, 28 of the top 100 trainers (28%) nationally were based in Newmarket. In 2018 it was 26% and in 2022 it was 31%.
- 3.25 As well as maintaining the greatest concentration of trainers, a review of the Directory of the Turf undertaken in March 2019 (understood to be the most recent available) shows that Newmarket has significantly more stud farms than the other clusters. This is in part owing to the proximity to Tattersalls and world class veterinary facilities in Newmarket. Figure 3.7 shows how Newmarket benefits from a substantially higher concentration of stud farms and trainers in comparison to its other key competing GB locations.



Figure 3.7 Concentration of Stud Farms and Trainers in GB HRI Clusters - 2019



Source: Lichfields analysis of the Directory of the Turf (March 2019)

3.26

Each of the six locations benefits from high quality training grounds, which provide the cornerstone of their role as the leading centres (notably Marlborough does not have a public training ground). The core activities are also complemented by suppliers and service providers. Nevertheless, only Newmarket has bloodstock sales (as these are more commonly linked to the operations of stud farms). A comparison of the facilities in each area is set out at Table 3.1.

Table 3.1 Comparator Location Analysis

Location	Trainers	Stud Farms*	Bloodstock Sales	Gallops	Racecourse
Newmarket	67	51	Tattersalls (in town)	Jockey Club Estates	Rowley Mile, July Course (in town)
Lambourn	36	4	Ascot (45 miles)	Jockey Club Estates (and private)	Newbury (15 miles)
Malton	26	2	Doncaster (60 miles)	Langton World Gallops and Highfield Gallops	York (17 miles)
Marlborough	9	5	Cheltenham (40 miles)	Various	Newbury (19 miles)
Middleham	15	1	Doncaster (80 miles)	Low and High Moors	Catterick (14 miles)
Epsom	10	2	Ascot (30 miles)	Jockey Club Estates	Epsom Downs (in town), Sandown Park (7 miles)

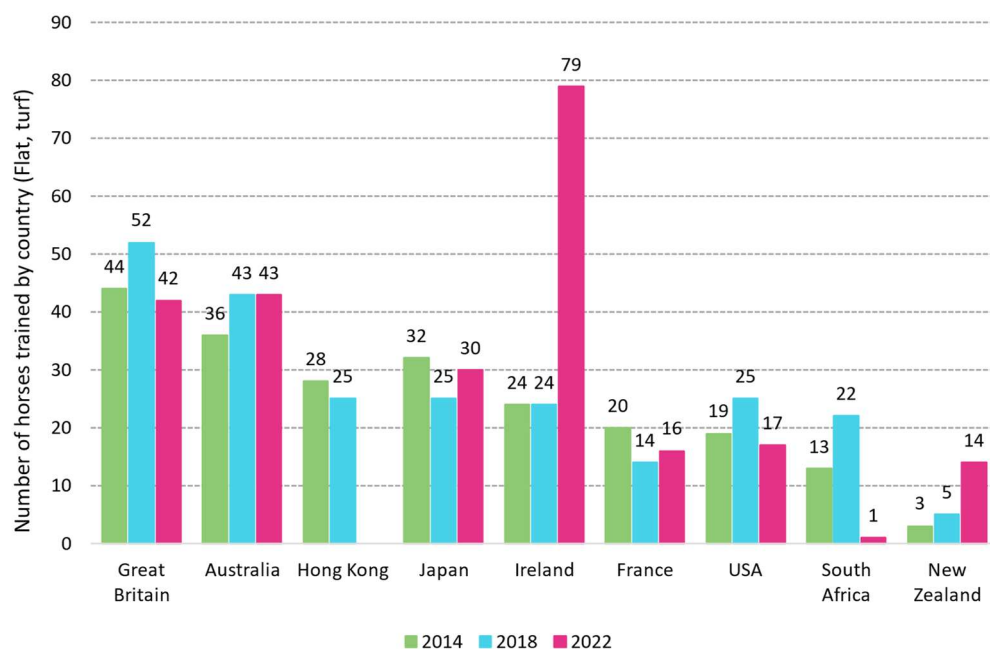
Source: British Horseracing Authority (August 2022) and Directory of the Turf (March 2019) (for stud farms only), Lichfields analysis

- 3.27 This analysis shows that Newmarket is unique within the UK as a centre of both breeding and training activity, with a scale and critical mass of supporting infrastructure for the HRI that is not provided elsewhere.

### Wider comparators (Europe and Worldwide)

- 3.28 British racing is highly regarded on the international stage and continues to maintain a strong position in the world rankings. Owing to its international reputation as a leading horse racing location for breeding, training, racing and bloodstock sales, Britain attracts overseas investment from the people who choose to breed, train and race their horses in Britain.
- 3.29 Commentary from British Horseracing's International Influence (June 2019) from Sheikh Fahad, Qatar Racing, states *"The attraction to British racing is the sheer quality on an international stage. We are racing against the best horses who will, in time, go on to become Champion sires and broodmares. You cannot put a monetary value on such quality. That is why we love racing in Britain, and why it is the home of Qatar Racing."*
- 3.30 A review of the world's top 250 ranked horses trained on flat turf by country shows how Great Britain has held its own on the international stage in recent years. Figure 3.8 shows that Great Britain is currently ranked third in the world, with 42 of the top 250 ranked horses being trained here (albeit only one behind Australia which is in 2<sup>nd</sup> position, with 43). Of these 42, 81% are trained in Newmarket. Great Britain has been one of the most consistently performing countries, with 44 of the top 250 in 2014 and 52 in 2018.

Figure 3.8 Training Location of Top 250 Ranked Horses on Flat Turf – 2014, 2018 and 2022



Source: 2014 and 2018 World Thoroughbred Rankings and The Racing Post August 2022. This chart has been condensed to show those countries primarily with at least 10 horses in the rankings.

- 3.31 This data also shows that worldwide, the racing industry appears to have become more concentrated – in 2014 there were 17 countries which produced the top 250 ranked (flat,

turf) racehorses, in 2018 this had fallen was 15 and in 2022 it is now just 12 countries. Hong Kong, UAE, Argentina, Italy and Singapore have fallen out of the top 250 completely, whilst South Africa has declined to just 1 in 2022.

3.32 Some parts of the world have seen sharp increases – notably Ireland which has risen from 24 racehorses in 2014 to 79 in 2022 (i.e. now nearly a third of the total). New Zealand has also seen growth, from 3-5 horses to 14. However, this growth in Ireland (and to a lesser extent New Zealand) has clearly not been at the expense of Great Britain. Instead, it appears to be at the expense of Hong Kong (which has dropped out of the rankings altogether, from 28 to 0), South Africa and some of the other small contributors (i.e. UAE and Argentina). Great Britain has maintained a consistent position amongst world rankings in recent years whilst some other locations have seen substantial shifts in their contribution to world ranked racehorses, suggesting Great Britain (and Newmarket) are not at threat from change – or growth – elsewhere in the world. In particular, Ireland – which is in very close proximity to Great Britain geographically – more than trebled its contribution to world ranked horses between 2018 and 2022 (from 24 to 79, in just four years), and yet this had little discernible impact on Great Britain.

3.33 On these bases, there is no evidence to suggest that growth in other locations in the rest of the world, notably in Ireland and New Zealand, poses a threat to Great Britain or Newmarket specifically; Great Britain is amongst the most consistent performers in world rankings. It was noted by the Inspector in the Hatchfield Farm decision in 2020 (with which the SofS agreed) that:

*“Concerns were still voiced about the potential for overseas locations to become more preferable than Newmarket. Again, however, there do not appear to be any locations that do, or could, realistically rival the agglomeration of equine services and facilities found in Newmarket. Mr Anderson (for NHG) was clear that Newmarket’s offer was “not replicated elsewhere” (IR 463)*

## Summary

3.34 In 2020, the Hatchfield Farm Inspector noted *“it was common ground, unsurprisingly, that Newmarket is still very much the headquarters of horseracing in the United Kingdom and, arguably, the world, in terms of the breeding, sale and training of thoroughbred (flat) race horses.”* (IR439). In reviewing the evidence before that inquiry, the Inspector also concluded *“it appears that change in the industry since the last Inquiry [held in 2011] has been for the better and that the HRI remains in rude health.”* (IR444).

3.35 The HRI forms a significant amount of the Newmarket’s employment with approx. 30% of jobs in Newmarket directly linked to the HRI. The town has a unique assembly of horse racing interests covering all aspects of the racing industry. No other centres identified in Great Britain such as Lambourn, Epsom and Marlborough have facilities close to those seen in Newmarket.

3.36 Horses catalogued, offered and sold by Tattersalls have increased since the 2008 recession with Tattersalls having its best year ever (in terms of sales) since 2000 in 2021, appearing to have recovered well from the temporary impacts of the pandemic. Sales (£) are at close to record highs. There are currently 67 trainers in Newmarket and the number of horses in training stands at around 3,000. Of the top 100 ranked trainers in the country in 2022, 31%

were based in Newmarket; a slight increase compared with 2014 (28%) and 2018 (26%); there is no evidence that other locations in the UK currently represent a genuine alternative location to Newmarket or that Newmarket has been ‘under threat’ from other parts of the country in recent years.

- 3.37 Great Britain (of which Newmarket comprises 81%) contributes consistently to the top 250 world ranked racehorses; a position it has maintained in 2022 despite significant shifts seen elsewhere in the world, notably the growth in Ireland and New Zealand. Again, there is no evidence that growth in international locations has posed a genuine ‘threat’ to Great Britain or Newmarket specifically.
- 3.38 Today, Newmarket’s strong reputation to train racehorses appears to be robust. Our analysis above shows that the HRI cluster has weathered the Covid-19 pandemic when considering relevant indicators such as numbers of sales, numbers of trainers and world rankings. The Jockey Club appear to agree given their 14<sup>th</sup> March 2022 representation to the Planning Inspectorate in relation to Sunnica Energy Farm which states that *“Newmarket is generally accepted in horse racing as being the premier location in the world of the training and breeding of thoroughbred racehorses. The Newmarket racehorse industry underpins the local economy of the area in and around the town and the town itself. It is one of the two major business clusters in the region, the other being the Cambridge Science Park.”*
- 3.39 This section therefore demonstrates that Newmarket continues to have a unique reputation as a centre of international excellence.
- 3.40 The elements that underpin Newmarket’s success are numerous, but were summarised by the Inspector at the Hatchfield Farm inquiry (2012), who stated that Newmarket’s success was attributable to:
- “the reputation of Newmarket as possibly the best place in the world to train racehorses (12.4.1), the owners’ delight to see their horses traversing the town on their way to and from the gallops (8.4.3) and the apparent resilience of the industry during the recession (6.7.5, 7.2.7)...” (IR12.4.28)*
- 3.41 Newmarket has clearly maintained its reputation as possibly the best place in the world to train racehorses, evidenced by the consistently high performance of Great Britain amongst world rankings (and the significant amount attributable to Newmarket) and its range of facilities which is unrivalled nationally. As well as showing apparent resilience during the recession, the industry appears to have shown similar resilience with the recent Covid-19 pandemic, with sales returning to near-record high (in terms of number of horses sold in £) and with a consistently high number of the top ranked trainers in the country being based in Newmarket.
- 3.42 At the second and third Hatchfield Farm inquiry, the HRI suggested that the mere act of granting planning permission for that development would undermine Newmarket because it would suggest the prospect of risks in the longer term and that the HRI’s concerns were not being taken seriously, thus increasing the perception of harm the industry feels. That development was granted permission in March 2020 and subsequent reserved matters applications have progressed. It is of note that there is no evidence that the HRI’s concerns in this regard were borne out.

- 3.43      The longstanding factors underpinning the HRI in Newmarket clearly continue to contribute to its success; Sections 4.0, 5.0 and 6.0 assess whether the scheme could potentially affect these elements.

## 4.0 The Impact of Solar Farm Developments on the Horse Racing Industry

- 4.1 In response to the wider HRI objections to the Sunnica scheme, this section considers how solar farms in England have been considered with respect to the potential to impact on the HRI. The aim has been to review planning material – particularly objections, submission documents, and officer/committee reports – to understand how the potential impacts of solar farms on the HRI was considered or assessed. The location of operational solar farms has been determined using the ‘Renewable Energy Planning Database: quarterly extract’ published by BEIS. We also briefly consider the purported negative link between solar farms and local tourism.

### Solar farms near existing HRI clusters: how were the potential impacts on the HRI considered?

- 4.2 We have undertaken a review of solar farms located near – defined as within 5km<sup>8</sup> – to existing HRI clusters. This boundary is deemed to be a reasonable distance within which any solar farms could be deemed near enough to have any impact on HRI sites (by virtue of their proximity). Beyond this distance, we expect any visual, glint, glare or transport impacts would be unlikely to impact a HRI site. The HRI clusters are those identified in Section 3.0 of this report, being: Newmarket, Lambourn, Malton, Marlborough, Middleham, and Epsom. From this analysis we have identified seven solar farms within the 5km buffer zones from these clusters.

Table 4.1 Solar farms identified near HRI clusters

HRI Cluster	No. Solar Farms Identified.	Installed Capacity (July 2022)
Newmarket	5	112.7 MW
Lambourn	1	17 MW
Marlborough/Lambourn	1	7 MW

Source: Lichfields Analysis, BEIS (2022).

- 4.3 In addition, a solar farm installation has been identified near to Taunton Racecourse which we have also reviewed.

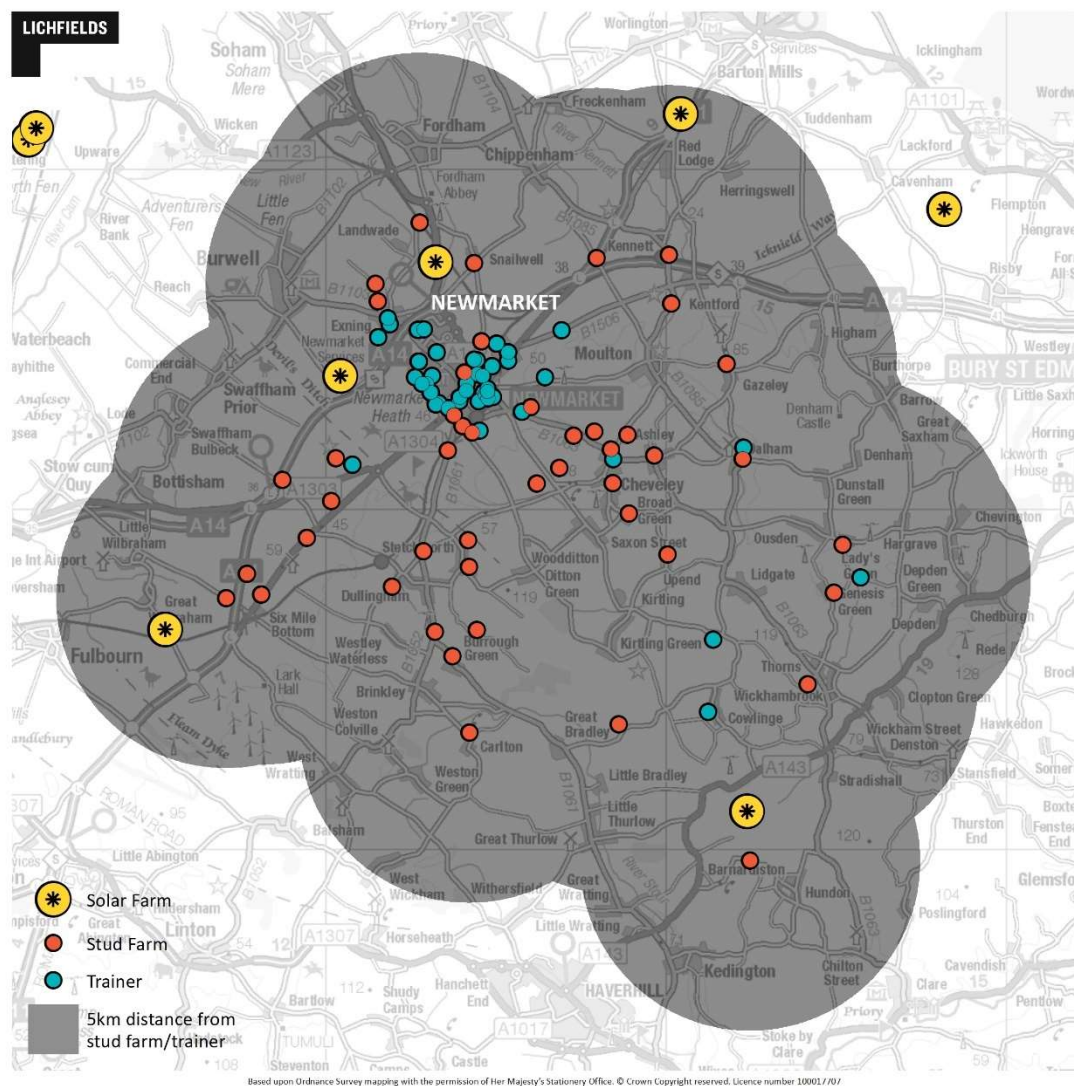
### Newmarket

- 4.4 Within the Newmarket 5km buffer zone, there are five operational solar farms with a combined capacity of 112.7MW, shown in Figure 4.1.

<sup>8</sup> The 5km search zone extends from the outer edge of the equine uses we have identified in each cluster (as shown in Figure 3.7).



Figure 4.1 Solar Farms around the Newmarket HRI Cluster



Source: Lichfields analysis of the Directory of the Turf (March 2019), BEIS (July 2022)

4.5 The two closest solar farms to the Newmarket clusters core are located just on the north side of the A14 Newmarket Bypass. These are:

- **Exning Solar Farm (29.9 MW)** – Operated by ‘Vortex’ and operational since March 2015. Located to the immediate south of this solar farm is the Newmarket Rowley Mile Course. (Planning ref. 13/00878/ESF, LPA: East Cambridgeshire District Council).
- **Forest Heath Solar Farm (5 MW)** – Operated by ‘Munich RE’ and operational since February 2014. This solar farm is located along the Fordham Road adjacent to studs. (Planning ref. F/2012/0655/FUL, LPA: West Suffolk).

4.6 Reviewing both planning applications:

- There were no objections raised to either development by any stud farms, trainers, or other equine interest groups (i.e. The Jockey Club);

- Regarding visual impacts, while some adverse impacts were identified it was concluded these could be sufficiently mitigated;
- Both noted there would be HGV traffic during construction and any decommissioning of equipment. Conditions imposed to manage impacts on local highways network were considered to acceptably manage the effects.

In the Forest Heath Solar Farm scheme, the highways officer noted that construction traffic should avoid significant race days at Newmarket Race Course (which was followed through in a 'Traffic Management Plan' submitted to discharge Condition 3 attached to the permission).

- The relevant local planning authority (LPA) in all cases did not explicitly consider whether the proposed solar farms would have any adverse impacts on either an individual horse racing facility or the HRI cluster of Newmarket as a whole against relevant adopted policy.

For example, in the Exning Solar Farm's officers report there is no reference to or assessment of the development against then adopted Policy EC7<sup>9</sup>. This policy (now superseded), set out that the Council would prevent development that would cause 'disruption or disturbance' to horse breeding or training.

- 4.7 Looking at all five solar farms identified around Newmarket, all were made operational between February 2014 and March 2015. This means there has been a total of 112.7 MW of solar farm capacity operational for more than seven years within the HRI cluster. Reviewing the other three solar farms<sup>10</sup>, no objections were raised to their development by HRI representatives. In the period since operation, it is clear Newmarket's HRI has not declined based on an objective review of the evidence in Section 3.0 of this report (i.e. considering sales data, service offer, and the concentration of world ranked trainers and horses).
- 4.8 Finally, a further solar farm is set to be developed within the 5km buffer zone, east of Burwell. This follows East Cambridgeshire Council granting planning permission (ref. 21/0968/FUL) for the 49.9 MW scheme in December 2021. Again, no representations were made alleging a detrimental impact on the HRI either on an individual equine related business or the Newmarket cluster as a whole. The British Horse Society's comments to the application related only to impacts to public rights of way.

## Lambourn

- 4.9 Lambourn is one of the recognised largest training centres for racehorses in the United Kingdom. For example, it includes the Jockey Club's training grounds and is known as the 'Valley of the Racehorse'. Notwithstanding, it is of a significant smaller scale of concentration than Newmarket (as identified in Section 3.0) and it was recognised in the March 2020 Hatchfield Farm decision (appeal ref. 2222871) that there was no substantive evidence that Lambourn posed a threat to Newmarket's primacy (IR459). There are two solar farms<sup>11</sup> within the 5km buffer zone. The closest is located to the west of Membury

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<sup>9</sup> Contained in the former Core Strategy (2009) (the relevant Development Plan document to the proposal at the time).

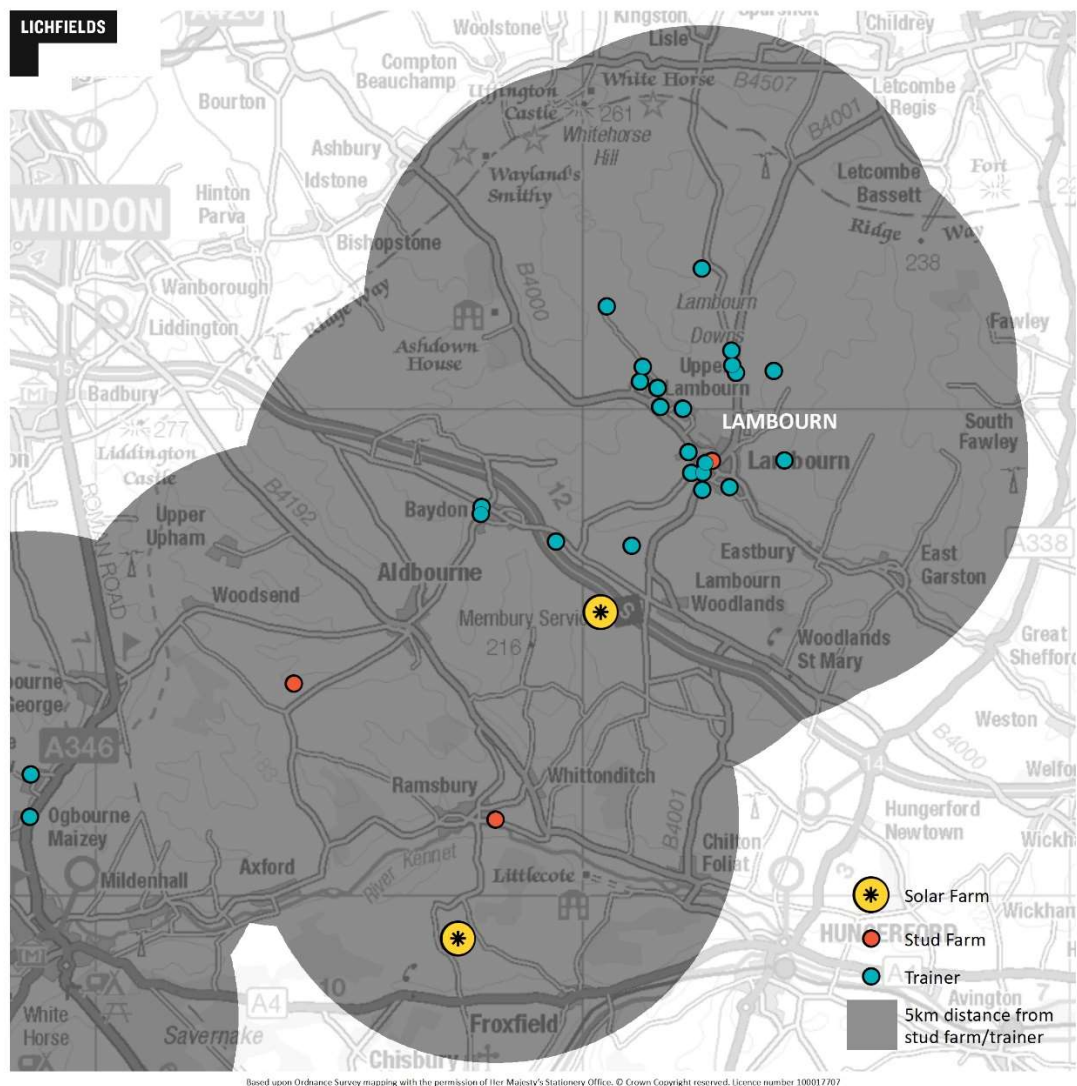
<sup>10</sup> (1) Great Wilbraham Solar Farm – 38.1 MW (LPA: South Cambs, App Ref: S/2763/13/FL). (2) Broxted Solar Farm – 31.6 MW (LPA: West Suffolk, App Ref: SE/12/1114/FUL). (3) Bay Farm Solar Farm – 8.1 MW (LPA: West Suffolk, App Ref: F/2012/0464/FUL).

<sup>11</sup> The 'Orta Membury Solar Farm' is operated by 'Foresight Solar'. App ref: 14/00385/COMIND. LPA: West Berkshire. & the



Services, across the M4 motorway from the Kingwood Stud. There is a second farm (which also falls within the Marlborough buffer zone (as is assessed separately below).

Figure 4.2 Solar Farms around the Lambourn HRI Cluster



Source: Lichfields analysis of the Directory of the Turf (March 2019), BEIS (July 2022)

4.10

#### Reviewing the Membury solar farm's planning application:

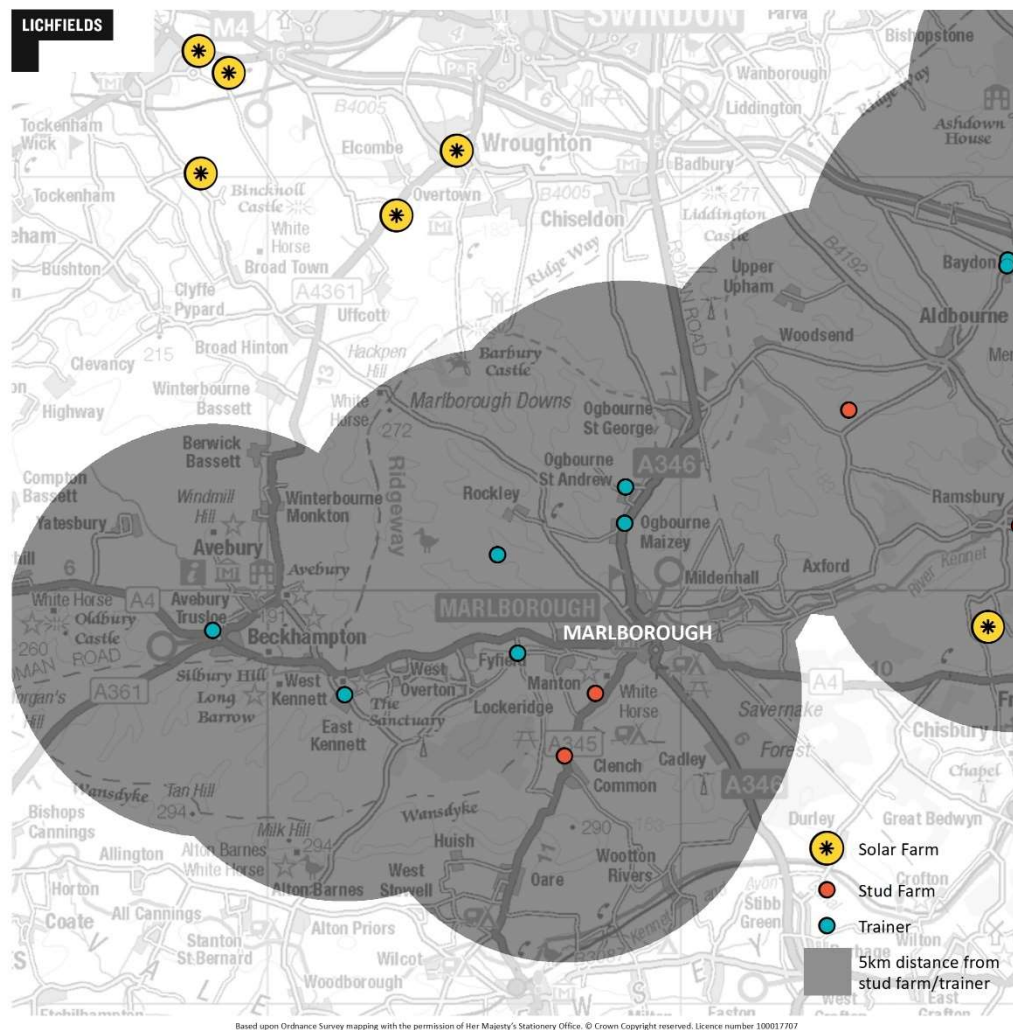
- No objections were raised by members of the HRI;
- It was noted that there were no highways objections and that the impact would be temporary. There was no consideration of the potential impact of traffic on the local HRI;
- There was no specific consideration of the development's impact on the horse racing industry at Lambourn; and
- An LVIA supported the application, and this found that the development would only be visible from a single byway.

## Marlborough

4.11

There is a single solar farm – Rudge Farm Solar Farm (7 MW)<sup>12</sup> – operational within the 5km buffer zone around the Marlborough cluster. As aforementioned, this also falls within the 5km buffer zone from Lambourn). While the site is located within the cluster’s buffer zone, unlike Newmarket, the cluster is more disparate and the solar farm is located far from the main core. Nevertheless, no objections were raised by the HRI and the LPA did not assess the impact on the HRI.

Figure 4.3 Solar Farms around the Marlborough HRI Cluster



Source: Lichfields analysis of the Directory of the Turf (March 2019), BEIS (July 2022)

## Taunton Racecourse

4.12

A smaller installation – 1.5MW – solar farm is operational adjacent to Taunton Racecourse. The solar farm has been operational since 2015 and the application was submitted by AEE UK Limited and the racecourse itself. The racecourse owners would presumably have not made the submission should they have thought it would impact the ability of horses to use

<sup>12</sup> Operated by 'Orta Solar'. App ref: E/2012/0946/FUL. LPA: Wiltshire.

the racecourse safely or harm the racecourse's long term viability. No HRI representatives made comments that the scheme would put them off taking their horses to race at the course.

## **Other potential impacts on the Horse Racing Industry: local tourism**

- 4.13 Some representations to the Sunnica scheme have raised concerns relating to the development's potential impact on local tourism. For example:

*"As the General Manager of the Jockey Club Rooms and Chambers, I object to Sunnica as this will spoil our surrounding areas of natural beauty. We need to do everything we can to make Newmarket appealing to tourism and if this goes ahead I can see our Chambers occupancy rates will fall as many guests currently visit to see the horses and surrounding areas." (The Jockey Club Rooms)*

- 4.14 Another states:

*"Newmarket is famous for its beautiful landscapes with equine stud farms and training facilities. People flock from worldwide to watch horses work on the famous gallops. a solar farm this big would only take away from its appeal, stop tourist from visiting and affect the industry." (John Gosden Ltd)*

- 4.15 These representations link the perceived visual impacts of the scheme – both on Newmarket as a whole and directly from the gallops – as negatively impacting tourists' experience of coming to Newmarket to see horses train and enjoy the landscapes setting of the town. These representations assume that the visitors would be less likely to return given the perceived impacts, harming the local tourism industry and hospitality venues. This in turn would undermine the HRI as it relies at least in part on the wider tourism and hospitality industry to support those visitors staying in the town to use the equine related facilities, view horses train, and attend events.

- 4.16 Objectors to the scheme have not provided any evidence to demonstrate a link between the development of solar farms and a corresponding negative impact on local tourism (i.e. resulting in fewer visitors); nor have they provided evidence sufficient to demonstrate that if there is a link, the impact would be so severe the impact would undermine the long-term viability of the HRI at Newmarket.

- 4.17 Notwithstanding, we have considered wider public attitudes to solar farms. One might assume that if the public at large held negative attitudes to solar farm developments, then a material link between solar farm development and reduced visitor numbers might be a hypothesis worthy of consideration. However, the Government's own polling shows this is not the case. BEIS publishes a quarterly 'Public Attitudes Tracker: Energy Infrastructure and Energy'. The latest publication (June 2022)<sup>13</sup> shows:

- 87% were supportive of solar energy in general;
- 54% of people surveyed would be happy about a solar farm being built in their area, with 27% not minding either way. Only 12% would be unhappy, with the remaining

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<sup>13</sup> 'BEIS Public Attitudes Tracker: Spring 2022'. Available: <https://www.gov.uk/government/statistics/beis-public-attitudes-tracker-spring-2022>

stating they either did not know enough about solar farms or were not applicable to their area (i.e. those in urban areas may not expect a large solar farm to be built nearby);

- There is relatively little regional variation as to ‘happiness’ for local solar panel farm developments; and
- For those stating they would be unhappy about a solar farm development, the reasons raised most for this view were the visual and local wildlife impacts of a scheme (61% and 51% respectively), followed by the concern their house price may be affected (35%).

4.18 In addition, an older survey prepared on behalf of ‘Good Energy’ (2013) (a renewable energy provider) considered the specific impact of renewable energy farms on visitors to Cornwall (as well as their attitudes to wind farm developments)<sup>14</sup>. This showed that at that time, only 35% of visitors were aware of solar farms in Cornwall. Of this group, 71% said the solar farms had no impact, 22% indicated they had a positive impact, and only 7% said they had a negative impact on their visit.

4.19 Based on the above, it would seem highly unlikely that people visiting Newmarket, primarily to see horses race and train, would be deterred from visiting due to a nearby solar farm.

## Summary of analysis

4.20 We have undertaken a review of solar farms applications located near HRI clusters. From this, we have found no examples where an HRI representative has previously made an objection against a solar farm on the basis that it would threaten the viability or operation of their industry or site. Nor did the relevant LPA in any of the examples reviewed consider the specific impacts of the scheme on the nearby HRI (either in general or on an individual facility).

4.21 Looking at the solar farms specifically around Newmarket, while each of these schemes are far smaller (at least individually) than the proposed scheme, the HRI has continued to thrive and has weathered the pandemic well (as shown in Section 3.0 of this report). HRI objectors to the Sunnica scheme made no objections to the existing solar farm schemes when they were proposed, and no evidence has been provided to demonstrate how these schemes have negatively impacted the HRI in years since becoming operational. It therefore appears spurious given the lack of evidence presented that the Sunnica scheme will so adversely affect the longer term viability of the HRI, given it already thrives and co-exists alongside nearby solar farms. This clearly shows that no evidence of impacts has been observed since each of these became operational, nor has there been any notable cumulative impact.

4.22 We have also briefly considered whether the unevidenced link between solar farm development and a reduction in visiting tourists has merit given some objectors have raised this as an issue which could undermine the HRI. Given overwhelmingly positive public attitudes to solar farms, it appears highly unlikely that visitors to Newmarket coming to buy, sell, or watch horses train and race will be put off by the solar farm.

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<sup>14</sup> ‘The Impact of Renewable Energy Farms on Visitors to Cornwall’ (2013). Available: <http://www.deg.wales/wp-content/uploads/2015/09/TheimpactofrenewableenergyfarmsonvisitorstoCornwall-FINALREPORT-November13.pdf>

## 5.0 **Assessed Impacts of the Sunnica Scheme on factors relevant to the HRI**

- 5.1 This section provides a summary of the scheme's potential impacts on factors relevant to the HRI by theme based on the technical assessments undertaken in the evidence work accompanying the DCO submission. For each theme, we set out a summary of the concluded impacts of the scheme alongside references to relevant material in the submission. We use this assessment to then inform our appraisal on the impact of the scheme in terms of the HRI itself in Section 6.0 of this report.

### **A. Landscape/visual impacts and historic setting**

#### **Relevant technical reports**

- ES – Chapter 10 (Landscape and Visual Amenity) (ref. APP-042)
- ES – Chapter 7 (Cultural Heritage) (ref. APP-039)
- ES – Figure 10-11f (ref. REP1-013)
- Equine ZTV – Figure 1F (ref. REP1-022)

#### **Commentary and concluded impact**

##### **Visual impacts on people training horses at the Limekilns Gallops:**

- 5.2 The Limekilns Gallops lie to south of Sunnica West Site A. This facility is used during the summer and includes the Golden Mile, Long Gallop, Short Gallop and Round Gallop. It is separated from Sunnica West Site A by the A14 trunk road and a railway line. Its immediate setting to the north is therefore already influenced by major infrastructure, beyond which the DCO Site lies. It is not a designated landscape.
- 5.3 There are views north towards the site from locations within the gallops or from small gaps in the tall, dense roadside hedgerow, where owners and trainers observe racehorses training. The most open views would be from along the edge of the Limekilns Gallops, parallel to Well Bottom (B1506). Horses in this section of the Limekilns Gallops train east/west, parallel to the B1506. Views of the site quickly reduce in extent on descending the hill towards the A1304, which divides the gallops. Planting is proposed to soften views but it is acknowledged that by year 15, these will not have developed sufficiently to fully screen views.
- 5.4 The DCO site forms part of a broader backdrop to views from the higher ground of the Limekilns Gallops north east of Newmarket. The scheme will be visible in places across this background, beyond the busy A14 trunk road and softened by existing vegetation and planting proposed as mitigation for the Scheme. For the majority of people involved in training racehorses, views of the landscape are secondary to their activity, which is their main focus.



**Visual impacts on people training horses from the Snailwell Gallops:**

- 5.5 Despite the proximity of Sunnica West Site A to the Snailwell Gallops, effects on the views of people working and visiting there are assessed as not significant in all scenarios assessed.

**Visual impacts on people training and moving horses from within Newmarket:**

- 5.6 The development will not be visible from within the town based on the 'Theoretical visibility' of the scheme (as detailed in the ES Figure 10-11f, and Figure 1F submitted at Deadline 1). This includes the central areas where the horse walks are located between various gallops, stud farms, and other facilities.

**Impact on the Heritage of Newmarket, which contributes to spectacle of the HRI within the town:**

- 5.7 The impact on Newmarket's conservation area has been assessed in Chapter 7 of the ES Cultural Heritage of the ES in relation to the conservation area. This takes into account the contribution that the horse racing industry makes to the heritage significance of the area, particularly the Limekilns. The assessment concludes that the visual impacts of the development will not impact on the ability to appreciate the significance of the heritage assets within Newmarket including the understanding of the importance of the racing industry to the evolution of the settlement and wider landscape.

**B. Impact on health of horses****Relevant technical reports**

- ES – Appendix 16D (Unplanned Atmospheric Emissions from Battery) (ref. APP-124)
- Outline Battery Fire Safety Management Plan (ref. APP-267)
- Sunnica Response to Relevant Representations (ref. REP1-016).

**Commentary and Concluded Impact****Fire risk to horses**

- 5.8 An assessment of unplanned atmospheric emissions from a battery fire has determined what the dilution rates will be for any plume from a fire as it disperses from the sites. The dispersion model does not predict absolute impacts at specific receptor locations. Instead, a nominal unit emission rate has been used to calculate concentrations close to the source and at fixed nodes that are at 50m increments downwind, for all wind directions in 10 degree segments. It also assesses the impacts in the context of relevant guidance to protect human health.
- 5.9 The results show that by the time a plume were to reach the nearest receptor the pollutants would be diluted considerably. The assessment has demonstrated that even with a worst-case estimate of potential pollutant release concentration, the dilution means there is likely no adverse impact on the health of the local community.

- 5.10 An Outline Battery Fire Safety Management Plan has also been submitted which details the methods of mitigation to reduce the potential residual risks of fire event. This plan has been updated for Deadline 2 of the examination.

### **Fertility of horses**

- 5.11 The Applicant is not aware of scientific literature of BESS associated with solar farms affecting fertility of horses. The Applicant has sought an expert opinion on the issue and the relevant expert has stated that there is “*no evidence for any negative effects of working batteries on fertility in horses*”. The relevant experts in this case include (1) Professor Meriel Moore-Colyer (Professor of Equine Science at Royal Agricultural University); and (2) Ashley Ede (Bloodstock & Horseracing specialist at Blue Furlong Consultancy).

## **C. Economic impact**

### **Relevant technical reports**

- ES – Chapter 10 (Landscape and Visual Amenity) (ref. APP-042)
- This report

### **Commentary and concluded impact**

#### **Negative economic impact on HRI, potentially resulting in trainers leaving or owners moving horses to other locations:**

- 5.12 As explained above:
- 5.13 The scheme will not result in the loss of any existing HRI sites.
- 5.14 There is no evidence from the representations that trainers would leave Newmarket or owners move their horses away if the scheme was implemented.
- 5.15 There is no evidence that the existing solar farms around Newmarket have resulted in an adverse impact to the HRI.

## **D. Disruption of bridlevays within Newmarket (i.e. those used by the HRI to move within the town)**

### **Relevant technical reports**

- ES – Chapter 13 (Transport and Access) (ref. APP-045)
- ES – Appendix 13C (Construction Traffic Management Plan and Travel Plan) (ref. APP-118)

### **Commentary and concluded impact**

#### **Impacts on HRI users utilising wider bridleway network**

- 5.16 Taking account of proposed mitigation, the visual impacts on HRI users of the bridleway network would not be significant. There would be adverse visual impacts initially, until mitigation is put in place.

- 5.17 There will be several temporary closures of PRowS and local roads during construction. However, these impacts will be managed in accordance with a final Construction Traffic Management Plan ('CTMP'). These impacts would only be temporary.

### **Impacts on bridleway network in Newmarket**

- 5.18 Given the location of the development site, there will be no direct impacts (i.e. blocking or rerouting) to the network of the horse walks within Newmarket.

## **E. Disturbance to racehorses**

### **Relevant technical reports**

- ES – Appendix 16A (Glint and Glare Assessment) (ref. APP-121)
- ES – Chapter 13 (Transport and Access) (ref. APP-045)
- Transport Assessment (ref. APP-117)
- Framework Construction Traffic Management Plan (ref. APP-118)
- ES – Chapter 11 (Noise and Vibration) (ref. APP-043)
- Sunnica Responses to Representations (ref. REP1-016).

### **Commentary and concluded impact**

#### **Glint and glare**

- 5.19 A 'Glint and Glare Assessment' concludes that reflections from the PV panels to the HRI receptor locations during operation will either not be geometrically possible or will be sufficiently screened.
- 5.20 The Applicant has engaged horse behavioural specialists regarding glint and glare (Professor Meriel Moore-Colyer - Professor of Equine Science at Royal Agricultural University and Ashley Ede - Bloodstock & Horseracing specialist at Blue Furlong Consultancy.) The advice received is that even in the absence of mitigation, it is unlikely a horse would be affected by glare given the location, distance and direction of travel of Limekilns gallops in relation to the solar panels. Therefore, the solar farms will not have an adverse impact on the training/movement of horses by virtue of their potential glint and glare.

#### **Traffic / highways**

- 5.21 It is concluded that there will be no significant adverse effects to the highway network during construction.
- 5.22 HGV Traffic associated with the Scheme's construction will be routed so as not to enter Newmarket, as illustrated by the Framework Construction Traffic Management Plan [APP-118]. This is secured by Requirement 16 of Schedule 2 of the draft DCO [APP-019]. HGV traffic will therefore have no impact on horse crossings or routes within the town.



- 5.23 During the operational phase of the Scheme, paragraph 7.1.8 of the Transport Assessment [APP-117] explains that operation of the Scheme would result in a maximum of an additional 17 vehicles on the highway network per day.

### Noise

Noise from a solar farm is low and continuous and unlikely to cause disturbance in the long-term; however, there may be a period of adjustment when the solar farm is testing. The Noise and Vibration Chapter of the ES concludes that during construction, operation, and deconstruction the effects will be negligible to most receptors. It also concludes “*No health impacts or long-term significant effects are considered to arise on PRow users, equestrian users on bridleways or horses in training facilities.*” (Table 11-11).

## 6.0 Assessing the Scheme's Impact on the Newmarket HRI

6.1 This section of the report assesses whether or not the Sunnica scheme and its concluded impacts may pose a real risk to the HRI at Newmarket, based on the framework described in Section 1.0. This framework is set by the PA 2008, section 105 (2) specifically which states that the SofS must have regard to the following in the absence of a NPS which “has effect”:

(a) any local impact report prepared by the relevant local authorities,

(b) any matters prescribed in relation to development of the description to which the application relates, and

(c) any other matters which the SofS “thinks are both important and relevant” to the SofS’s decision.

6.2 In this case, we have identified that in light of the representations made, the perceived impact on the HRI is likely to be considered an important and relevant matter in the SofS decision making.

6.3 We set out an assessment of the scheme’s impacts on both individual HRI components and the long-term viability of the HRI at Newmarket as a whole.

### Assessing the Sunnica scheme

6.4 Using our framework set out above, and noting the specific impacts of the scheme, the below details our assessment of the Sunnica proposal in the context of the current strength of Newmarket as a HRI cluster.

#### 1) Will the Sunnica scheme be likely to have an adverse impact on the operational use of an existing site within the Horse Racing Industry?

6.5 The Sunnica scheme will not result in the loss of an existing HRI facility. In relation to impacts on existing operational sites, the following is noted:

- 1 Regarding **Snailwell Gallops** (adjacent to Sunnica West Site A, operated by Godolphin), Godolphin itself states “*There is an existing planting belt between the application site and the Gallops, however it is essential that this planting belt is infilled in parts to ensure there is no view through from the Gallops into the site.*” Proposed planting associated with the Sunnica scheme seeks to achieve this and therefore no visual impacts are anticipated in relation to the Snailwell Gallops. The Glint and Glare assessment identifies geometrically possible<sup>15</sup> reflection on the Snailwell Gallops in the AM, but concludes this would be screened and therefore no residual impacts are predicted;
- 2 Similarly, regarding the **British Racing School**, the Glint and Glare assessment identifies a geometrically possible reflection in the AM, but concludes this would be screened and therefore no residual impacts are predicted;

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<sup>15</sup> This should be seen in the context that draft EN-3 states “Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes and motorists.”

- 3 For the **Godolphin Stables, Bury Hill Gallops** and **Long Hill Gallops** the Glint and Glare assessment concludes no solar reflection is geometrically possible and therefore no impacts are possible; and
- 4 For the **Limekilns Gallops**, the Glint and Glare assessment concludes there is no reflection geometrically possible and that no impacts are therefore possible. On this basis, and based on the advice of the horse behaviourists identified above, there is no reason to suggest that horses using the Limekilns Gallops will be affected by the presence of the solar farm. There are some localised adverse visual impacts for users of the Limekilns Gallops identified by the assessment, however mitigation is proposed to soften the visual impact and the scheme would be viewed as part of a wider backdrop beyond the busy A14 and a mainline railway. There is no evidence to suggest that the visual change in the context of the Limekilns Gallops will materially and adversely affects its operational use within the HRI.

- 6.6 It is also important to note that gallops are typically used early in the morning, with training concluding around 10am (as noted in the Godolphin representation); therefore even if some change to the setting of any gallops were to occur, it would constitute a relatively small part of the overall training experience (e.g. for an owner travelling to Newmarket to see their horse in training, their time on the gallops would constitute a very small proportion of their overall day).
- 6.7 There are also no adverse highways or noise impacts asserted or identified on a specific HRI site. Mitigation to construction traffic will also be implemented (i.e. construction traffic routing and timing) through a finalised CTMP.
- 6.8 Given the above, it is not considered that the scheme would likely have a notable adverse impact on the operational use of any existing HRI site; including the Snailwell and Limekilns Gallops.

## **2) Will the Sunnica scheme threaten the long-term viability of the horse racing industry as a whole?**

### **Context**

- 6.9 To set the scene for our assessment, the March 2020 Hatchfield Farm Inspector stated that at the time of making their decision “... *it was common ground, unsurprisingly, that Newmarket is still very much the headquarters of horseracing in the United Kingdom and, arguably, the world, in terms of the breeding, sale and training of thoroughbred (flat) race horses*” (IR439).
- 6.10 The same Inspector also concluded that, based on the evidence of various witnesses, that “*much was made ... of Newmarket’s cluster of HRI facilities being second to none, with a unique set up that was not, and probably could not be, replicated elsewhere*” (IR440). It was also noted that new trainers had moved to Newmarket, that the number of staff at the Newmarket Equine Hospital had increased, the number of top ranked horses trained at Newmarket had increased, and that Tattersalls had seen very strong performance (IR441 & 442).
- 6.11 On the back of this growth, it was noted that ‘Review Hotels Ltd’ had both increased the number of rooms at its ‘Bedford Lodge Hotel & Spa’ and had recently purchased ‘The

Rutland Arms Hotel’ on Newmarket High Street. These investments were “*reflective of a belief in the continued buoyancy of the bloodstock industry in the town and the need of auction attendees and race goers for hotel space*” (IR443).

- 6.12 In noting all of the above, and other indicators referenced in the decision letter, the Inspector concluded that “*this is all far from indicative of an industry in decline, or at risk ... In short, it appears that change in the industry since the last Inquiry [held in 2011] has been for the better and that the HRI remains in rude health*” (IR444).
- 6.13 Considering other competitor locations, the same Inspector concluded:
- “*Concerns were still voiced about the potential for overseas locations to become more preferable than Newmarket. Again, however, there do not appear to be any locations that do, or could, realistically rival the agglomeration of equine services and facilities found in Newmarket. Mr Anderson (for NHG) was clear that Newmarket’s offer was “not replicated elsewhere”. Although Chantilly in France is similar, he noted, it does not have horse sales or the same level of veterinary support. Sites in Australia, such as Warwick Farm, Sydney, are much smaller, and in North America one has to travel considerable distances to access facilities beyond the race courses at which horses are typically based.*” (IR464).
- 6.14 It was also concluded in that inquiry that “*there is no evidence before the Inquiry to suggest that any trainers would move out of Newmarket, or that owners would remove their horses from the town, if planning permission was granted for the application scheme.*” (IR465).
- 6.15 Looking at the Newmarket HRI today (as detailed in Section 3.0 of this report), there is no evidence to suggest its position has noticeably changed. Our own analysis demonstrates that Newmarket has at the very least maintained its position both in Great Britain and globally.
- 6.16 There is also no new evidence to suggest a global location will or is providing a similar offer to Newmarket since that inquiry and there is no new evidence that any trainers would leave Newmarket or owners remove their horses should the Sunnica scheme be granted. On the contrary, Godolphin’s representation states that “*If it has to proceed, the planting and construction constraints listed above must be implemented*”. This does not suggest that Godolphin – a principal thoroughbred stable – will move its horses out of Newmarket if the scheme goes ahead.
- 6.17 We have also set out a review of specific solar farm schemes across the country. This shows that Newmarket is already a location where Solar Farms have and continue to be installed. Within 5km of the HRI cluster, there are five operational schemes as well as a further scheme which is soon to be developed with more just outside that zone. These farms have been operational across a timeframe where the Newmarket HRI has thrived.
- 6.18 Finally, some objectors have stated that the scheme will result in a decline in local tourism. This could in turn harm the HRI. However, there is no evidence presented to back up this claim.

### **Will the Sunnica scheme threaten the longer-term viability of the HRI at Newmarket?**

- 6.19 When considering the ‘advantages’ of Newmarket which makes it the special place it is, the scheme would not alter the racehorses moving around the town from their stables to the training grounds. This is because the scheme would not be visible from the town centre or the principal areas where horses traverse the town. It will also not block or reroute existing horse walks.
- 6.20 The scheme will also not result in the loss of any HRI facility meaning it will not cause a loss of HRI function. It will not affect the quality of the ground or its topography. A glint and glare assessment has concluded that across various HRI facilities, there either could be no impact (because it was not geometrically possible) or there will be no potential impact given existing and proposed screening. Finally, its operation will not impact the running of horse racing events in Newmarket.
- 6.21 While there will be some noise impacts, these are localised, temporary and negligible, and would be at a level where they are unlikely to cause disturbance to horses nearby. In addition, while there will be some highways impacts these were considered not to be adverse.
- 6.22 The principal effects of the scheme on the HRI at Newmarket are to the public (and those watching horses in training) at the Limekilns Gallops. The only impact of the scheme to those gallops are landscape and visual considerations. It is acknowledged that there will be moderate adverse impacts to some views within the gallops. However, we do not consider, for the reasons set out in the following paragraph that these impacts do, in and of themselves, threaten the long-term viability of the Newmarket HRI.
- 6.23 The scheme will not be visible across the whole of the gallops. It could be that a visitor, owner, or investor may only view the proposed scheme for a very limited time from certain locations in the gallops. This is because different areas of the gallops are also used in the training of the horses so as not to overuse a particular area of turf; this means those users may not view the solar farm on each visit. Any views will also be softened by additional planting and would be seen in a much wider context, across the busy A14 and a railway line. These users are also primarily visiting the gallops to see the horses train and their ability to focus on the horses train – within a much wider setting – will not be substantially altered.
- 6.24 Newmarket is also a centre for the HRI on a national and international scale. Key investors do not live in Newmarket and mostly come to the public auctions or to see their horses train, often being internationally based<sup>16</sup>. It is true that some very significant players in the international bloodstock world have ‘bases’ in Newmarket (e.g. Godolphin) and some have residential accommodation in or around the town for when they visit the town. On these visits, they will make best use of the facilities and enjoy the spectacle of the horses training and traversing the town. The undertaking of these activities on those few days will not be affected other than the potential for some adverse visual impacts that might arise, primarily on one gallop which they are not guaranteed to go and see, and with views that they may not encounter depending on which part of the gallop is being used.

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<sup>16</sup> As set out in evidence given at the Hatchfield Farm inquiry (APP/F3545/V/14/2222871)

- 6.25 We therefore conclude that, based on the evidence, it is highly unlikely that investors would relocate their operation – at substantial cost – to another location because of a solar farm that is visible from mainly one gallops. No Investor has suggested this would be the case to date. Nor is there evidence that they would direct future investment away from Newmarket. This is equally true for visitors who come to enjoy the town and its equine-related historical setting. Newmarket is generally considered to have a “*unique set up*” because of the concentration of high quality of the training facilities linked to the spectacle of horses moving around it<sup>17</sup>. These have all combined to create and sustain the successful HRI. On the evidence available, it is not a fragile industry; indeed, it is one that remains strong despite recent economic difficulties. The solar farm proposed will not alter these factors and it will therefore not, on the evidence available, threaten the long-term viability of the HRI (whether perceived or actual).
- 6.26 Flowing from this, the evidence does also not suggest then that the supporting tourism industry will be adversely affected. Visitors, investors, and owners will in all likelihood continue to come to Newmarket. The pull factors for these groups are primarily horse-related and this development will not undermine the ability of such activities to be undertaken and enjoyed. Added to this, if domestic tourists also wish to enjoy the countryside outside of Newmarket, then our assessment of public attitudes suggests the vast majority of people would not be deterred from visiting. It can therefore not be concluded that the solar farm would undermine the local tourism industry to any extent which would in turn undermine the long-term viability of the HRI at Newmarket (which it supported).

## Conclusions

- 6.27 In conclusion, assuming that the SofS considers the development’s impact on the HRI is an important and relevant matter, under Section 105 (2) of the PA 2008, the evidence put forward clearly shows that the HRI in Newmarket is performing well, and would continue to perform well. The perceived impact will therefore not be of detriment to the operational use or viability of the HRI.

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<sup>17</sup> As described by the Hatchfield Farm Inspector, IR440 (APP/F3545/V/14/2222871)

## 7.0 Summary and Conclusions

- 7.1 This report considers the effects of the scheme on the wider Newmarket HRI. It demonstrates that the scheme, with its mitigation, will not have a material adverse effect on the industry at Newmarket; threatening its long term viability. This takes account of Newmarket's current position – both nationally and internationally – as a location for the breeding and training of thoroughbred racehorses and planning precedents drawn from previous decisions, including by the Secretary of State.

### Relevant policy

- 7.2 The scheme is of national importance and is being determined against the PA 2008. Section 105(2) of the PA 2008 requires the SofS to have regard to any other matters which the SofS “*thinks are both important and relevant*” to the SofS's decision when deciding whether or not to grant a DCO.
- 7.3 We have assumed for the purposes of this report, in light of the representations made on perceived impact to the HRI that the SofS may consider this as an important and relevant matter which should be taken into account. Whilst there is no specific solar energy NPS in place, it is important in considering all the relevant matters, the government's commitment in NPS EN-1, to dramatically increase the amount of renewable generation capacity. Draft NPS EN-1 also announces the need for sustainable growth in the capacity of solar energy in the next decade. This highlights the overriding need for solar energy in forming a decision about whether such development should progress.
- 7.4 NPS EN-3 also notes that traffic movements to and from solar farms are generally light and includes guidance on impacts such as glint and glare and the need for assessing these. These impacts are analysed in sections 5 and 6 of this report.

### Newmarket: health of the HRI cluster

- 7.5 Newmarket is home to the largest cluster of training yards in the country. It is also home to many key horse racing organisations, including Tattersalls, the National Horseracing Museum, and the National Stud. Horseracing is rooted in Newmarket's history. It has an assembly of horse racing interests in the town covering all key aspects of the HRI. It also forms a significant amount of the town's employment (c.30%). In 2020, the Hatchfield Farm Inspector assessed the evidence on the HRI and concluded (at IR444) that:
- “...this is all far from indicative of an industry in decline, or at risk, in spite of the concerns about traffic levels in the town. In short, it appears that change in the industry since the last Inquiry [in 2015] has been for the better and that the HRI remains in rude health”*
- 7.6 From our updated analysis, this conclusion remains valid. The HRI is not an industry which is fragile, with investors, trainers, and other ancillary services all having significant investments tied into Newmarket.

### Planning review of solar farms

- 7.7 To provide some planning context, we have reviewed applications for solar farms located near HRI clusters and where they could have an impact on tourism (in response to specific



HRI objections). To supplement this, we have also looked at general attitudes towards solar farms.

7.8 For solar farm schemes near existing HRI clusters, this analysis found:

- 1 Newmarket is already the location of five operational solar farms all within 5km of the wider HRI cluster. These have been operational across a period in which Newmarket has thrived. The Newmarket HRI raised no objections to these schemes.
- 2 We have not found an example where the HRI has previously made an objection against a solar farm on the basis that it would threaten the viability or operation of their industry.

## **The impacts of the Sunnica Solar Farm on the HRI at Newmarket**

7.9 We have considered and summarised the assessed effects of the Sunnica proposals on the HRI at Newmarket. To determine how it might sit against the planning framework provided by the PA2008 we have set out what we believe the key important and relevant matters are in determining the DCO application. This includes assessing the impact on the operations of the HRI and its viability to gauge whether the scheme is likely to result in any detriment to the HRI. We have also considered our previous analysis and findings in relation to the strength of Newmarket as well as the assessment of other solar farm developments. Our conclusions regarding impact on operations and viability are set out below.

### **1. Will the scheme likely have an adverse impact on the operation or use of an existing HRI site?**

7.10 We conclude it will not.

7.11 The impacts of the scheme do not adversely impact the operational use of an existing HRI site. For example, there are no adverse highways impacts, glint and glare impacts, or noise impacts on any HRI site. While there are some adverse landscape visual impacts – primarily to the Limekilns Gallops – these are not considered to adversely impact its operational use:

- The scheme will not be visible across the whole of the gallops and it will not so drastically alter the user experience. It is unlikely any visitor, owner, or investor will see the scheme for anything more than a very limited time and only from certain locations which they will be unlikely to occupy every visit to Newmarket.
- In any event, any views will also be softened by additional planting and would be seen in a much wider context, across the busy A14 and a railway line.
- Visitors or owners are also primarily visiting the gallops to see the horses train rather than to survey the landscape, and their ability to focus on the horses train – within a much wider setting – will not be substantially altered.

### **2. Would the scheme threaten the long-term viability of the HRI as a whole?**

7.12 We conclude it will not.

- 7.13 Newmarket has a strong and robust HRI which is clearly thriving. The scheme will not harm the factors which give Newmarket's its advantage – as identified by the March 2020 Hatchfield Farm Inspector (appeal ref. 2222871, IR 392 and 370) – even close to a degree that would threaten the long-term viability of the Newmarket HRI.
- 7.14 We conclude that it is unlikely that investors would relocate their existing investment – at substantial cost – to another location because of a solar farm that is partly visible from primarily a single gallop. Newmarket is special because of the concentration of high quality of the training facilities linked to the spectacle it provides. The scheme will not alter the factors which give it its advantage and it will therefore not, on the evidence available, threaten the long-term viability of the HRI (whether perceived or actual). We note that Godolphin – the single largest international investor in the Newmarket HRI - have explicitly not indicated that the development would cause them to take investment away from Newmarket, and their interest is in ensuring that the mitigation is appropriately implemented.
- 7.15 While it is noted that the HRI in general objects to the scheme, this is not sufficient to amount to a refusal under the PA 2008. This is in accordance with the March 2020 Hatchfield Farm Inspector (see IR483 to IR484). The Hatchfield Farm decision also makes clear that there is no basis for concluding that the mere act of granting permission for a facility that is perceived adversely by the HRI would harm the industry, given it would be approved followed by a careful assessment and with appropriate mitigation.
- 7.16 In conclusion, impact on the HRI is capable of being an important and relevant matter to the SofS decision making process but there are no compelling reasons to show that the HRI will be impacted detrimentally in its operations or longer term viability.

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