



SUNNICA ENERGY FARM DCO EXAMINATION

WRITTEN REPRESENTATION

ANNEX E – IMPACT ON HORSERACING

SAY NO TO SUNNICA ACTION GROUP LTD

11 NOVEMBER 2022

Summary assessment of impact on the horseracing industry in
Newmarket & connected planning policy assessment
for
Say No To Sunnica Action Group & Newmarket Horsemen's Group

PROPOSED SUNNICA ENERGY FARM, VARIOUS PARCELS OF LAND NORTH OF NEWMARKET, CAMBRIDGESHIRE-SUFFOLK BORDER

November 2022

Our Ref: RMSP/21-01858

QUALITY ASSURANCE

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Introduction

1. Rapleys were approached by the Newmarket Horsemen's Group (NHG) in November 2020 in connection with proposed Sunnica Energy Farm development which, at that point, was at the pre-application stage. The enquiry was passed to me as Partner responsible for the Planning team in our Cambridge office (the office closest to the site of the proposed development).
2. We were asked by NHG to advise them on how they should respond to Sunnica's pre-application consultation given their concerns about the impact that the proposed development might have on the local area and the horseracing industry in particular.
3. I was initially sceptical about NHG's concerns given the widespread perception of solar development (including my own) as a relatively benign form of development and its "green" reputation.
4. However, as I reviewed the information about the proposed development that was available at the time it became clear to me that:
 - There were issues with the level of assessment that had been undertaken, and the assessment methodologies adopted, in the process of preparing the proposals;
 - Consideration of the proposals against planning policy had not been undertaken and could not be undertaken on the basis of the information that had been prepared at that point;
 - Notwithstanding its shortcomings, significant effects with respect to cultural heritage and landscape and visual impact had been identified by the applicant's assessment work;
 - Inadequate assessments in other areas left the potential for further significant effects to be identified;
 - No assessment of the harm that would result from the assessed effects had been undertaken;
 - The nature and extent of the benefits of the proposals had not been assessed; and therefore
 - It was impossible to determine the acceptability of the proposals at that stage as both the level of harm they would cause and the benefits they would yield had not been quantified.
5. We submitted representations to this effect to Sunnica on behalf of NHG in response to their pre-application consultation in December 2020.
6. Rapleys were approached again about the proposed development in August 2021. This second approach was from the Say No to Sunnica Action Group. It was also passed to me as the Partner responsible for the Cambridge Planning team.
7. I was asked to investigate and report on the impact of the proposed development on the horseracing industry specifically.
8. I was again sceptical to a degree, for the same reasons as I had been previously (though I was less sceptical this time given the findings of our earlier work), but I agreed to review the application at a high level in order to understand what impacts on the horseracing industry, if any, had the potential to result from the proposed development.
9. Following my review I spoke to a number of respected individuals from within Newmarket's horseracing industry (a collective term encompassing used to described the individuals, businesses, institutions and other organisations within and surrounding Newmarket whose

activities have a horseracing focus). At this point it started to become apparent to me that because of the location and significance of some of the places in which the horseracing industry carries out its operations and activities, the way the industry functions and the way it is funded, there was, at the very least, potential for the proposed development to have an impact on the horseracing industry.

10. Rapleys consequently accepted an instruction from the Say No to Sunnica Action Group and the Newmarket Horsemen's Group with a view to establishing what the impacts of the proposed development on Newmarket's horseracing industry were likely to be, how likely they were to occur and how significant they would be.
11. Despite what I had established in my initial research, my initial review of the DCO application showed there to be little reference to any potential impacts of the scheme on the horseracing industry, let alone what the probability of those impacts occurring would be and how significant the impacts would be.
12. As my work progressed it became clear to me that the proposed development would give rise to impacts that would affect the horseracing industry.
13. In order to be able to assess the potential impacts of the proposed scheme I had first to understand the nature, extent and significance of the subject of any potential impacts - the horseracing industry in Newmarket.
14. My knowledge of the horseracing industry was no more than that of the ordinary person prior to being approached by the Say No to Sunnica Action Group. Over the course of the instruction I have therefore had to review a range of sources of information about the industry. I have also spoken to numerous industry figures, some of them prominent and highly respected for their contributions to and successes within the industry. Some are highly educated, some have backgrounds in other professions¹, some have worked in the horseracing industry all their lives, most have lived in or near Newmarket and spent most if not all of their equine careers in Newmarket. All have an excellent understanding of their industry and the factors that are necessary for it to exist, and those necessary for it to thrive.
15. Once I had gained an understanding of the horseracing industry in Newmarket and the way it functions I had to consider how the proposed development might affect the industry. Thinking about it in the terms used for some types of environmental assessment, there was a potential source of effects (the proposed development) and there was a potential receptor (the horseracing industry) so I needed to understand if there was a pathway connecting the two. Given the somewhat amorphous nature of the industry, part of the process involved establishing which aspects or elements of the industry had the potential to be receptors.
16. It was clear from my initial review of the application and my research that the most obvious effects on the industry were likely to be on the places owned, occupied by and/or used by the industry and the operations and/or activities taking place at or within them. By considering proximity and intervisibility between these places and the proposed development site I was able to establish a list of "physical assets" that were most likely to be affected.

¹ In some instances this provided them with useful context when responding to my questions.

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17. I then considered the means by which, given their proximity and intervisibility with the site of the proposed development, these physical assets and the operations and/or activities taking place at or within them may be affected. I identified a number of possible effects and estimated the possible magnitude of them or referred to the work of others who had already assessed them.²
 18. The next stage of my work was to understand the significance of the physical assets that would be affected; my researching of the Newmarket horseracing industry and conversations with key industry figures was critical in achieving this. Once the significance of the assets was understood I was able to consider the nature and extent of the impacts that the effects of the development would have. Finally, having considered the likely impacts of the proposed development on the physical assets owned, occupied and used by the horseracing industry (and/or any associated operations and activities), I then considered how these impacts would translate into impacts on the more amorphous body that is the industry as a whole within and around the town.
 19. The findings and conclusions of my research and assessment work are set out in the accompanying *“Assessment of impact of proposed energy farm on the horseracing industry in Newmarket and the immediate surrounding area”* report (Appendix 1).

Summary of findings of research and assessment

20. From the research I have conducted, starting from scratch given my very limited knowledge of the horseracing industry when the Say No to Sunnica Action Group first contacted us, I have found as follows.
 - a. Britain is a horseracing nation. It is the original horseracing nation of the modern horseracing era and is possibly the pre-eminent horseracing nation of the current day. Despite the international status and significance of the horseracing industry there are relatively few countries where horseracing is a major sport, and Britain is lucky to be one of them. Britain is even more fortunate to be in running for the position of pre-eminence amongst the horseracing nations, if indeed it is not pre-eminent, and Newmarket is privileged to be the foremost breeding, training and racing centre in the world.
 - b. Horseracing in Britain is of major significance; historically, culturally, economically and in pure sporting terms. There is nowhere else in the world that comes close to the level of history and culture of horseracing that Newmarket enjoys. The town's horseracing industry is also of significance in the sphere of international relations as a source of soft power for the UK.
 - c. There is no location in the world comparable to Newmarket in terms of the scale, diversity and concentration of its horseracing operations. Further, these operations and their associated facilities and services are among the best in the world, if indeed they aren't the best in the world.

² Landscape and Visual Issues relating to the Sunnica Energy Farm, Michelle Bolger Expert Landscape Consultancy Heritage Assessment - Sunnica Energy Farm, Richard Hoggett Heritage

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- d. Newmarket's horseracing industry is of national, regional and local economic significance. It is worth £208m annually to the local economy alone. Coupled with this, and for the reasons set out above, it has international significance in the horseracing world. Newmarket trained horses win more than their fair share of overseas races and the town's horseracing industry is a natural focus for international investment.
 - e. Despite the apparent strength of Newmarket's horseracing industry its current dominance is far from secure. Horseracing's global centres are locked in a constant battle for the investment that determines their survival and success relevant to other centres (leading to dominance for one of these centres at any given time and grappling by the others to supplant it). The evidence suggests that Newmarket's current success is primarily down to a wave of significant investments in stud farms in the last 25 years, but that investment, and the investment that came with it, could leave as freely and quickly as it arrived.
 - f. History is proof that the fortunes of horseracing centres rise and fall, particularly so Newmarket. Some of the factors that have led to Newmarket's rise and fall in the past are no longer relevant but other factors which have contributed, or have had the potential to contribute, like the impacts of inappropriate or poorly planned development, remain relevant and their detrimental effects have been demonstrated in other global horseracing centres. Fortunately, in Newmarket, despite the fact that significant infrastructure and development projects have occurred in and around the town over time (e.g. the Cambridge to Ipswich railway line and the A14/Newmarket bypass), major impacts on the horseracing industry and "the Heath" on which it relies, have been mainly or wholly averted. This is because appropriate weight was given to the significance of the horseracing industry in the respective decision making processes. The risk to the horseracing industry remains however; the risk of urbanisation that it is - the risk of eroding the industry's connection with its rural roots, which is understood to be a key selling point for investors.
 - g. Another threat to the industry is an apparent under appreciation of its significance and value both locally and nationally. This is a recognised phenomenon and an extra hurdle that the business has to jump in order on a regular basis. It means the industry has to work harder to protect and support itself than it should, and means that it starts each battle to defend itself on the back foot, despite, in the case of planning and development matters, the industry benefitting from apparent policy protection and support.
 - h. The other significant threat, and perhaps the most significant, is the nature of the high net worth investment on which the industry relies. The threat is simply that high net worth investors are mostly footloose in terms of geography and choice of investment. They seek the best and have the freedom and resources to ensure that they get it. They can and do invest anywhere in the world therefore, and Newmarket faces significant competition from all of the world's other major horseracing centres, as well as other sports and leisure activities, as a result. Loyalty and inertia which may feature in other lines of investment and business are much less likely to be found in horseracing.
 - i. The combination of these threats is sufficient to cause substantial harm to Newmarket's horseracing industry, and as a result, its global standing and pre-eminence. Case studies prove that horseracing centres do face threats and do get harmed as a result. In this case, the threat of inappropriate development could spook and/or deter investors. Those investors are footloose, so have plenty of other options, and will simply invest elsewhere if they don't like the change they perceive is coming or the change that they

witness once it has occurred. Coupled with these two factors, and despite the apparent planning policy protection that it is the subject of, the industry will have to fight to protect itself because of the limited understanding and appreciation of its multifaceted significance and value, even among those who ought to know about it. To protect Newmarket's horseracing industry therefore, the environment in and around the town must remain conducive to breeding, training and racing horses. Further, the industry's links with its rural roots must be protected. Finally, Newmarket's appeal to investors, particularly international investors, must be maintained.

- j. The horseracing industry has a significant physical presence in Newmarket (as opposed to its operational presence - the presence and activity of people, animals and vehicles etc associated with the industry). Perhaps the most visible and obvious elements of this physical presence are the training grounds and racecourses but there are many others. It is at/on/within these physical horseracing industry assets that the industry conducts its operations and activities.
- k. Some of the physical assets in and around Newmarket used by the industry lie close to the "West Site A" part of site of the proposed development and have intervisibility with it. This proximity and intervisibility means that there is the potential for the proposed development to have impacts on these assets, and therefore on the industry.
- l. If it were to go ahead the proposed development would give rise to various kinds of effects, of differing degrees, on a number of horseracing industry assets. These would likely result in the following overall levels of effect on the following horseracing industry assets.
 - Chippenham Estate - very high magnitude of effect anticipated;
 - The Limekilns - high magnitude of impact effect anticipated;
 - Water Hall - high magnitude of impact effect anticipated;
 - Public right of way 204/5 (bridleway running SE - NW between Chippenham/Snailwell Gallops and Sunnica West Site A) - medium/high magnitude of effect anticipated;
 - Godolphin's Chippenham/Snailwell Gallops - medium/high magnitude of effect anticipated;
 - Arran House Stud - medium/high magnitude of effect anticipated;
 - St Simon Stud - medium magnitude of effect anticipated; and
 - The Railway Field - low/medium high magnitude of effect anticipated.
- m. These assets vary in their significance and the assessment work I have carried out has shown that the Limekilns and Water Hall (sometimes referred to jointly as the Limekilns) are of considerable significance. The Railway Field is of significance by virtue of its long history, its geographical association with the Limekilns and the Al Bahathri all-weather gallop installed on it in 1985 (the first modern all-weather gallop in Newmarket). Godolphin's Chippenham/Snailwell Gallops are of significance also because of the amount of money invested in them, the standard to which they are kept and role they play in the training of some of Newmarket's best horses.
- n. The significance of the Limekilns is multifaceted. It has to do with their size, layout and topography, the investment in their improvement over time and, as a result, the quality of their turf. They offer a range of gallops which provides various training options, including some which are central to preparation for some of Britain's biggest races. Their significance is also derived from their long history and the heritage and cultural

value they have built up as a result. Their hillside location and heathland character, coupled with the historic and continuing management practices used on them, and their public access and community value, give them significant landscape value also. An important part of the Limekilns' landscape and heritage value is their very strong link with the surrounding countryside. It was the Heath and its surrounding countryside which established horseracing in Newmarket centuries ago and the link between the two is still seen as an essential and unique part of Newmarket's offer today. Finally, the fact that the Limekilns offer the ideal preparation for some of Britain's biggest races means that they have been and are regularly used by some of the world's finest horses in the peak of their form. They therefore hold considerable sporting significance in their own right and are a major attraction for prospective and existing investors.

- o. The likely effects of the proposed development on these assets would result in a significant overall impact on each, resulting in most cases from noise, dust, busyness, movement and activity and landscape and visual impacts during the construction phase and landscape and visual, heritage, glint and glare and noise impacts during the operational phase. In most of these cases the impacts would not be able to be mitigated during the construction or operational phases and in most cases the applicant does not propose to try to mitigate them.
- p. The proposed development would change the nature of the views from the Limekilns from rural to semi-industrial. In so doing it would weaken the relationship between the Heath, the horseracing industry and the surrounding countryside. The change, by virtue of the industrial appearance of the development, would not be appropriate in this rural and sensitive (in both landscape and heritage terms) setting. It would alter the ambience of the Limekilns reducing the value, experience and enjoyment they provide to investors and the public.
- q. The impacts on specific horseracing industry assets identified are only part of the impact that the proposed development would have on Newmarket's horseracing industry as whole. Assessment of these identified assets has enabled some of the impact "pathways" between the proposed development and the horseracing industry to be demonstrated but the impact of the proposed development would be broader and is harder to define and demonstrate.
- r. The fundamental issue for the horseracing industry is that if the proposed development were allowed to go ahead it would have a significant negative impact the industry's ability to attract investment. The main forms this "investment" takes are the purchase of Newmarket bloodstock, purchasing bloodstock through Newmarket, paying to have horses trained in Newmarket and the purchasing and operation of horseracing industry assets like stud farms. This investment is the primary driver of economic activity in Newmarket. Because of the huge amount of choice available to wealthy investors, the ease with which they can move their investments (including their horses) and the fierce competition from other horseracing centres, not to mention other sports and leisure opportunities, it would not take much to alter Newmarket's position in investors' order of priorities. Negative impacts on the traditional and rural perception of Newmarket's horseracing industry would have negative impacts on investors at all levels; on enthusiasts, on those looking for a distraction and on high net worth investors.
- s. A crucial concern for the industry is that the message that would be sent to the global horseracing industry, and potential investors more generally, if the proposed Sunnica Energy Farm were to be granted consent, is that Newmarket's horseracing industry and

those with a role in protecting it don't care about the bigger picture, that they are not interested in protecting Newmarket and its rural setting.

- t. A further crucial point about the impact of the proposed development on investment in Newmarket's horseracing industry is that the impacts don't necessarily need to occur at all. The perception that they will occur or have occurred is likely to be sufficient. If the impacts are perceived to be harmful that will likely be enough to cause investors to look elsewhere. Another compounding factor is that there is scope for contagion of views among the horseracing industry and among investors. Changes to the industry tend to come in trends, which is partly down copy-cat behaviour and herd mentality. A decision by one significant investor could easily lead to similar decisions by others.
- u. There is consensus among those in the industry that loss of and/or reduced investment would be a very real possibility if the proposed development were to go ahead, and this would result in a reduction in the number of horses to train. It may also result in a reduction in breeding and sales activities. It could also result in the most significant investors, who own premises in and around Newmarket, pulling out of Newmarket. A significant proportion are international so have other bases abroad to fall back to if they need them, and there are plenty of other options if they wish to relocate. The evidence exists to show that loss or reduction of investment can happen and that contraction occurs as a result. Even a blip in results at one of Newmarket's largest horseracing operations, Godolphin, resulted in fewer horses to train and the closure of one of its yards in 2014.

Other matters

21. The scope of our assessment work is limited to the impacts on the core aspects of the horseracing industry. However, there are other related matters that are likely to need weighing in the planning balance. These are:

- The impact on tourism resulting from any harm caused to the horseracing industry;
- The impact on local businesses resulting from any harm caused to the horseracing industry; and
- Any impacts that the proposed development would have on the horseracing industry's ability to attract and retain the quality of professionals and workers required to maintain its current strength and depth of its offer.

Assessment of harm

22. Having established the likely impacts of the proposed development on the horseracing industry I assess the harm it would cause to be as follows.

- a. It would erode the horseracing industry's relationship with its rural setting and surroundings. This erosion would occur in one of the places where this historic relationship is most evident and most valuable. As a result it would cause significant harm by reducing the opportunities available to witness and appreciate Newmarket and the Newmarket horseracing industry in their historic contexts.
- b. It would harm the local landscape by inserting a large industrial form into a predominantly rural landscape. This form would be unnatural and inappropriate. Further, in the panoramic views north from the Limekilns (those naturally "consumed" by anyone visiting the Limekilns, commonly racehorse owners and investors) the

proposed development would be an expansive, obvious, discordant and unwelcome feature, the visibility of which could not be mitigated. As a result the ambience and experience of the Limekilns for users and visitors would be harmed significantly.

- c. It would harm the setting of one of the prize assets of Newmarket's historic horseracing industry, the 200 year old Limekilns. The Limekilns are a critical evolution in Newmarket's horseracing industry's history. They have been improved over time and now play an essential role in preparing some of the world's best horses for Britain's top races. Without the Limekilns Newmarket's horseracing industry would not achieve the results it does today. They are an essential component of the living cultural heritage asset that is Newmarket. The proposed development would not just harm the heritage significance of the Limekilns as they stand today, it would alter the course of their heritage evolution forever. Their link with the surrounding countryside, and with it the industry's 400 year old link with the surrounding countryside, would be degraded. In addition, their remaining heritage significance would be harder to read and appreciate.
- d. It would harm the operations of the horseracing industry. While the extent of this harm is not clear it would undoubtedly occur. The combination of likely effects from noise, dust and busyness, movement and activity during the construction phase and glint and glare and noise during the operational phase would be problematic for the highly tuned and highly strung thoroughbred horses that are trained and exercised at nearby (in some cases immediately adjacent) locations such as Godolphin's Chippenham/Snailwell Gallops and the bridleway (204/5) that runs alongside it. This is likely to diminish the quality of the training the horses get at these places and/or the benefit they gain from it. In the worst case it could give rise to health and safety issues for horses and people.
- e. It would be likely to cause economic harm as result of the other areas of harm identified above and the effect that they would have on investment in Newmarket's horseracing industry. Newmarket's success as a horseracing centre fluctuates over time and, ultimately, hinges on investment. High and sustained levels of investment mean that it flourishes, reduction in investment means that it declines. The evidence clearly indicates that the proposed development and the harm it would cause would deter and discourage investors, who already have plenty of alternative investment locations and options. Because investment is the primary driver of Newmarket's horseracing industry even a small loss would cause economic harm, as was seen on a very small scale in 2014 with Godolphin's Highfields yard. The proposed development has the potential to cause far greater levels of harm.
- f. The decline of the industry would cause various kinds of economic harm within the industry itself, not least loss of employment, reduced business for providers of equine related services and facilities, and difficulty attracting and retaining the best staff. Further economic harm would be likely to occur outside of the industry, most notably to tourism. The overall effect of these various harms would be a direct threat to the industry's viability. Because of its evident tendency to fluctuate and the fact that its current success is the result of a wave of investment over just the last 30 years, coupled with the current economic climate, it is clear that the industry's current viability is delicate and vulnerable even without considering the effects of the proposed development. The proposed development's likely impact on investment, which is the lifeblood of Newmarket's horseracing industry, would unquestionably threaten and, in my view, harm the viability of the industry. It has the potential to reverse some or all of the gains made over the last 30 years.

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- g. As a result of the other harms identified the proposed development would cause social harm. This would result from loss of employment, reduced income for business owners and impacts on the enjoyment of the physical assets used by the horseracing industry that are public accessible.
23. Having regard to all of the likely sources of harm that would result from the proposed development it is clear that the overall level of harm that the development would cause to Newmarket's horseracing industry would be significant. The industry in Newmarket holds major significance within and outside the horseracing world. In view of this fact even a small impact on it has the potential to cause significant harm. The harm to its relationship with the surrounding countryside, to its landscape and to its heritage, which are strongly interlinked, are the first main component of that significant harm. The second main component is the economic harm and associated knock-on effects it would cause, most notably the impact it would have on the success that the industry has been building over the last 30 years, and the very real risk of another period of decline for the industry, not least in the current economic circumstances. These two components taken together would amount to clear, significant and lasting harm to the horseracing industry and irreversible harm to the future course of its 400 year old evolution.
24. It would be completely illogical, indiscriminate and careless to imperil a centre of such cultural and economic significance and value. It is for this reason, presumably, that local planning policies exist specifically to protect the industry. I consider the relevant planning policies in the "Policy Review" section below.

Benefits

25. The benefits of the proposed development are set out in section 4 of the Planning Statement, which is entitled "The Need and Benefits of the Scheme". The "Summary of the Need Case" part of Section 4 states that the development will:
- be capable of delivering large amounts of low-carbon electricity to meet the UK's urgent need to decarbonise;
 - through the proposed NETS connection; help NGEN manage the national electricity system to ensure security of supply and bring cost benefits to electricity consumers;
 - through the integration of BESS; help manage electricity demand; and
 - be delivered quickly (ahead of other large scale solar projects and projects using other technologies).
26. It is worth noting that while these may provide a benefit at the national level (the extent of their benefit is not clear - see below) they do not provide any direct or specific benefit to the local community who will be most affected by the proposed development.
27. Section 4 then sets out the "Other Benefits of the Scheme". It states that the scheme provides a number of local benefits relating to:
- biodiversity (including a stated net gain of 83% for habitat units, 16% for hedgerow units, and 1% for river units);
 - heritage;
 - soils;
 - water quality;
 - employment; and
 - access.

28. An assessment of the benefits of the scheme is not within the scope of our instruction. However, the following observations are made:

- While the scheme would provide low carbon energy generation once operational it is not clear what the carbon footprint of delivering the proposed development would be (i.e. the carbon cost of producing the panels, batteries and other plant and materials; the carbon embodied in the panels, batteries, plant and materials; and the carbon cost of the construction work), nor the carbon cost of maintaining and renewing the scheme once operational. It is therefore not clear how low carbon the energy it would generate would actually be.
- While meeting national energy related needs is important it is not so important that it should be done at any cost - the development must still be acceptable in planning and environmental terms (see above and below sections) regardless of need.
- There are no guarantees that the proposed development would deliver ahead of other planned or proposed energy generation projects (solar or otherwise).
- The other/local “benefits” that section 4 of the Planning Statement claims are mostly in areas where there the scheme will give rise to significant impacts. In some cases therefore the claimed benefits are giving with one hand, having already taken with the other. The extent to which this is true probably varies across the different areas in question. However, in at least some cases the claimed benefits are likely to amount to mitigation only, with net harm or a net loss resulting from the scheme rather than a net benefit.

29. There is therefore sufficient uncertainty about the carbon status of the proposed development, its deliverability, and the extent to which the proposed benefits are benefits, that is not possible to determine the value and weight that should be attached to them. Without such information only limited weight can be sensibly be attached to them. It is worth noting that in thousands of pages of application material only seven pages are dedicated to the benefits of the scheme.

Policy review

30. I detail the relevant parts of the current and emerging local plan below.

31. The parts of the proposed Sunnica Energy Farm site that lie closest to Newmarket (mainly Sunnica West Site A) fall within the administrative area of East Cambridgeshire District Council while Newmarket lies the other side of the East Cambridgeshire local authority boundary, in West Suffolk. The West Suffolk administrative area was formerly the Forest Heath District Council and St Edmundsbury Borough Council administrative areas. These two Councils have been working together with respect to planning policy for almost 10 years. As a result of these administrative changes there are four policy documents that are relevant. They are:

- a. The East Cambridgeshire Local Plan 2015;
- b. The Forest Heath Local Development Framework Core Strategy Development Plan Document 2001 - 2026 (adopted May 2010);
- c. The Forest Heath and St Edmundsbury Local Plan Joint Development Management Policies Document (February 2015); and
- d. The emerging West Suffolk Local Plan.

32. I consider these below with a focus on the parts that are relevant to the horseracing industry.

East Cambridgeshire Local Plan (ECLP)

33. Section 5.7 of the ECLP deals with “Development affecting the horse racing industry”. Paragraph 5.71 provides:

“Given the historical association of the Newmarket area with horse racing, and its importance to the local economy, it is important that development does not have an adverse impact on the industry. Development which harms ... the racing industry as a whole, will be resisted.”

34. Policy EMP6 follows paragraph 5.7.1 and explains 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.”

35. This is a clear and direct policy statement to the effect that development that would merely threaten the long term viability of the horseracing industry (note that no actual harm need occur) will not be permitted. It should be noted that there is no balance to be conducted in the application of this policy - its stipulation means that the benefits vs harm test which is required by some policies should not be applied here. In this case, any threat or harm would require permission to be refused.

The Forest Heath Local Development Framework Core Strategy Development Plan Document 2001 - 2026 Spatial Strategy (FHCS)

36. The Spatial Portrait at section 2.1 identifies the significance of the horseracing industry to the District as things currently stand. Under the heading “Geography and Community” it states:

“The most distinctive characteristics of the District include the horse racing industry, which is centred on Newmarket and the surrounding area”

37. Under the heading “Economy” it states:

“There are three main employers in Forest Heath: The horse racing and bloodstock industries in Newmarket, which employ almost 20% of the town’s workforce”

38. Under the heading “Environment” it states

“The creation of the studlands around Newmarket relating to the horse racing industry has resulted in a unique area of landscape.”

and

“Overall, the District is very diverse but is highly constrained for a variety of reasons. The local constraints include its predominantly rural character ... and the needs of the horse racing and bloodstock industries.”

39. With respect to this unique area of landscape it goes on to explain that, “When examining proposals for development in these areas, the potential impact on this landscape will be an important consideration”.
40. Having set out the District’s current state and attributes the FHCS then sets out, in a Spatial Vision, what the Council wants the District to become. Significant parts of this spatial vision relate to the horseracing industry. Vision 1, which deals with the whole District, states:

“Forest Heath will be known for its unique countryside, its diverse population, rich heritage and a strong and diverse economy based on tourism, horse racing and other world leading and high-value businesses.”

41. Vision 2, which deals with Newmarket, states:

“Newmarket's position as the international home of horse racing will be preserved and enhanced. It will have been positioned and promoted further as both a destination for tourists and businesses, and as a hub from which the rich and distinct historic context of the district, its cultural attractions and environment can be enjoyed.”

42. The plan then details a number of spatial objectives derived from these visions. Spatial Objective ECO 5 is:

To utilise Newmarket's international reputation as the headquarters of horse racing to develop the town further as a tourism, leisure and cultural focus for Forest Heath, whilst still protecting its unique character.

43. The vision and spatial objectives are then translated into a number of policies. Those most relevant in this case are detailed below.

44. Policy CS 1 provides the Spatial Strategy. It states:

*“...
Newmarket
...
3. The importance of the Horse Racing industry and Newmarket's associated local heritage and character will be protected and conserved throughout the plan period;
...
5. The economic and cultural role of Newmarket as the living heart of British horse racing will be developed and promoted. ... ;
...”*

45. The equine industry gets first mention under Policy CS 6 entitled “Sustainable Economic and Tourism Development”. It states:

“Support will be given to developing and sustaining Forest Heath's existing economy with particular priority given to key sectors including the equine industry around Newmarket ...”

46. Policy CS 11, entitled Retail and Town Centre Strategy, then provides:

“... . The town's international cultural reputation as the headquarters of horse racing will be developed and links between leisure facilities and retail or other town centre facilities will be improved.”

The Forest Heath and St Edmundsbury Local Plan Joint Development Management Policies Document (JDMPD)

47. Section 9 of the JDMPD deals with horse racing. It's commentary and supporting text provide as follows:

“Horse racing plays a significant role in the area in terms of its economic importance, and social and cultural influence and the character of the built and natural environment, and will therefore be safeguarded.”

48. Under the heading “Development Relating to the Horseracing Industry”:

“As with many specialist industries the HRI is a cyclical activity reflecting the strength of the national economy and the trends and economic fortunes of the industry itself. There needs to be a balance where the industry is supported whilst at the same time safeguarded from short term trends which would compromise the long term viability of a horse racing use and the essential character of the townscape and landscape can be preserved. Any proposed development that will adversely affect the economic, social and environmental role of the Horse Racing Industry will not be permitted unless the benefits would significantly and demonstrably outweigh any adverse impact.”

and

“Paddocks and other equine open space, both within and outside settlement boundaries, contribute significantly to the intrinsic character and appearance of the area, and are vital to the viability of the industry. It is therefore important to safeguard these unique buildings and spaces that enable these activities and functions to thrive, and to protect the defining characteristics of the area. This historic pattern of development, landscape, character and economy could be eroded and weakened by unsympathetic or unsuitable development.”

49. Under the heading “Development Affecting the Horse Racing Industry”:

“The association of Newmarket and its surrounding area with sport and horse racing stretches back nearly 400 years. Throughout this time the needs and requirements of the industry have been constantly evolving, with cycles of growth and stagnation leading to the overall consolidation of Newmarket as the headquarters of horse racing. Long established planning policies have sought to safeguard the unique heritage of Newmarket, its landscape setting, and the economic importance of the HRI. Any proposed development that will adversely affect the economic, social and environmental role of the HRI will not be permitted unless the benefits would significantly outweigh any adverse impact.”

[emphasis added]

50. The associated policy is then provided as Policy DM48, entitled Development Affecting the Horse Racing Industry. It states:

“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.”

The emerging West Suffolk Local Plan (ELP)

51. The emerging West Suffolk Local Plan (covering the former Forest Heath and St Edmundsbury administrative areas, now covered by a single local authority known as West Suffolk) local plan

has recently undergone a second Regulation 18 consultation (a “Preferred Options” consultation). Responses to the consultation have been published and are being considered as the plan preparation process moves to the next stage. Adoption of the plan is currently anticipated to occur in July 2024.

52. The relevant parts of the Preferred Options draft are Strategic Objective 6 and paragraph 8.4. They confirm that the multifaceted significance of the horseracing industry in Newmarket and its role within West Suffolk will continue to be recognised, protected and promoted. Strategic Objective 6 reads:

“Support Newmarket as the international home of horse racing and the significant role the industry plays in West Suffolk. In terms of its economic importance as an employer and economic contributor, as well as its social and cultural influence on the town and the character of the built and natural environment.”

53. Paragraph 8.4 reads:

“The protection of the horse racing industry is paramount. A suite of specific local policies has been prepared in order to safeguard and enhance the horse racing industry.”

Policy assessment

54. All of the key aspects of the significance of Newmarket and the horseracing industry centred on it identified by my assessment are confirmed in the relevant planning policy documents
55. The documents also confirm the vision, aspiration and objective of protecting and developing, promoting and furthering the horseracing industry in the area. There are direct references to the economic and cultural roles of the horseracing industry as well as references to the industry’s links to the leisure, tourism and retail sectors.
56. The JDMPD acknowledges the even broader influence of the industry, confirming the economic, social and environmental roles that it plays.
57. ECLP Policy EMP6 is the most pertinent of the planning policies relevant to the proposed development because Sunnica West Site A (the part of the proposed development closest to Newmarket, and the part that would be most harmful to the horseracing industry) lies within the East Cambridgeshire district. It states that development that would *“threaten the long term viability of the horse racing industry as a whole, will not be permitted”*. No harm vs benefits balancing exercise is required. If the proposed Sunnica Energy Farm would threaten the long term viability of the HRI, as I have established it would, planning permission must be refused.
58. In the case of the West Suffolk development plan, while it falls under the heading “Development Relating to the Horseracing Industry” rather than the heading “Development Affecting the Horse Racing Industry”, paragraph 9.8 of the JDMPD is of particular relevance. Its references to equine open spaces (both within and outside settlement boundaries) and the significant contribution of these spaces to the intrinsic character and appearance of the area, as well as their importance to the industry’s viability, are crucial acknowledgements of the industry’s huge and defining contribution to the significance of the area, as well as the industry’s reliance upon the open spaces cited for not just the industry’s livelihood but its vigour. Paragraph 9.8 then points out that the *“historic pattern of development, landscape, character and economy”* represented by the open spaces and their interactions could be *“eroded and weakened by unsympathetic or*

unsuitable development”³. It therefore concludes that it is important to safeguard these open spaces.

59. Paragraph 9.8 is a crucial acknowledgement of the significance and value of the open spaces in Newmarket which have their roots in, and serve, the horseracing industry, and the need to protect them.
60. The majority of the proposed Sunnica Energy Farm site lies in the East Cambridgeshire district. This includes Sunnica West Site A which is the closest part of the site to Newmarket and the part that will have the greatest impact on the horseracing industry. However, although Newmarket lies very close to Sunnica West Site A, it falls within the administrative area of West Suffolk. The West Suffolk development plan is therefore a material consideration in this case but it cannot and does not carry the same weight as the East Cambridgeshire Local Plan in relation to Sunnica West Site A.
61. The policy approach in the West Suffolk development plan for determining whether “*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, or which would threaten the long term viability of the horse racing industry as a whole*” will be permitted, is that it will not be permitted unless the benefits would significantly outweigh the harm the development would cause to the horse racing industry (Policy DM48). The starting point for any determination is therefore that such development will not be permitted. The only way of shifting from this starting point is for the scheme to demonstrate that the weight attached to the benefits it would generate (when conducting the planning balance) would be significantly greater than the weight attached to the level of harm the development would cause to the horseracing industry. In this case I have established clearly that the level of harm the scheme would cause to the horseracing industry would be significant. The nature and extent of the benefits that the scheme must demonstrate that it would deliver⁴ would therefore have to be such that their weight in the planning balance would be noticeably and substantially greater than the weight attached to the significant harm that the scheme would cause.
62. It should be noted that the supporting text to Policy DM48 makes specific reference to: 1) the unique heritage of Newmarket; 2) its landscape setting; and 3) the economic importance of the horseracing industry. It also notes the efforts over time to protect them through planning policy.
63. There is no emerging policy to which any significant weight can be attached for the purposes of determining this DCO application. There is no emerging development plan in East Cambridgeshire and the emerging development plan in West Suffolk has only reached “Preferred Options” consultation stage.
64. The policy position in this case is simple and clear therefore. The development plan for the area in which both Sunnica West Site A and the physical horseracing industry assets that would be

³ The proposed development would clearly be both unsympathetic *and* unsuitable. This has been confirmed by the “*Landscape and Visual Issues relating to the Sunnica Energy Farm*” report prepared by Michelle Bolger Expert Landscape Consultancy and the “*Heritage Assessment - Sunnica Energy Farm*” report prepared by Richard Hoggett Heritage.

⁴ This is important. It must be shown that any claimed benefits would be delivered/realised if the scheme were to be delivered. If their deliverability cannot be proven they cannot feature in the balancing exercise.

most significantly affected by the proposed development are located determines that the development *will not* be permitted. This is because, as has been demonstrated, it would clearly “threaten the long term viability of the horse racing industry as a whole”.

65. The development plan for West Suffolk, in which Newmarket lies, carries less weight in the decision making process for this case by virtue of the fact that the proposed development and the locations it would affect most directly do not lie within its plan area. Even if the West Suffolk development plan were to provide the key policy for determining the application it is worth noting that, given the significant harm the scheme would cause, the plan requires that the nature and extent of the benefits that the scheme would deliver would need to be such that their weight in the planning balance would be noticeably and substantially greater than the weight that should be attached to the harm that the development would cause. This is not the case here.

Conclusions

66. The Newmarket is of local, regional, national and, in some cases, international significance as a result of its longstanding and inextricable association with the horseracing industry. This encompasses:
- a. Its status as the headquarters and home of horseracing;
 - b. Its current position at the top of the horseracing world (including the breadth, depth and quality of what it is able to offer the industry);
 - c. Its historical and cultural significance; and
 - d. Its economic significance.
67. Britain, East Anglia and Suffolk and Cambridgeshire together are all privileged to be home to the headquarters of horseracing and the historic, cultural and de facto home of horseracing. As these accolades suggest, no comparable place exists anywhere else in the world.
68. Despite the Newmarket horseracing industry’s current and historic position it is ever vulnerable. Further, it is likely to be more vulnerable today than at any point in recent history due to the effects of globalisation on sport, wealth and leisure. Newmarket’s horseracing industry therefore needs more support and protection today than it has at any point since land use planning was introduced in Britain.
69. Significance of the nature found in Newmarket and its horseracing industry is rare and it goes without saying that it must be valued and protected. Failure to support and protect Newmarket’s horseracing industry would almost certainly lead to its diminution and decline, such are the threats to it and pressures on it, particularly from development. While the loss of the industry from Newmarket altogether seems unlikely, at least in the short or medium term, even relatively limited decline would threaten the industry’s world leading position; the upkeep of its characteristic landscape; its value as a living cultural heritage asset; and its economic value as a generator of investment, as an employer and as a tourist destination and attraction. More serious decline is also possible and, if this were to occur, the effects would be more severe.
70. It is for this reason that the significance of Newmarket’s horseracing industry has been specifically identified by the local development plan making process over time, and that the protection of its significance has become an established objective of local land use planning. So significant is Newmarket’s horseracing industry that it has been singled out from many other worthy causes for special note and, more importantly, protection in all of the relevant local planning policy documents prepared in at least the last 30 years.

-
71. The current local planning policy position as far as the proposed development is concerned is simple and clear. The key policy, which is found in the East Cambridgeshire Local Plan, states unequivocally that development that would threaten the long term viability of the horseracing industry will not be permitted. Further, although subservient to the East Cambridgeshire local plan in terms of the weight to be attached to it in this case, the West Suffolk Local Plan, also offers a high level of protection for the horseracing industry and stipulates that the benefits of development that would threaten the industry's long term viability must significantly outweigh the harm the development would cause in order for it to be permitted.
72. As I have established through my research and assessment, the proposed development *would* threaten the long term viability of the horseracing industry in Newmarket, both in the short and long term. The threat would result from:
- a. Harm to key elements of the horseracing industry's significance;
 - b. Loss of investment;
 - c. A resulting contraction of the industry;
 - d. The industry's proven susceptibility to fluctuations in viability over time;
 - e. Loss of some or all of the gains made in the last 30 years during which Newmarket has reasserted itself as the preeminent racehorse breeding, training and racing centre in the world;
 - f. The risk of a downward trend that could take many years to halt and reverse.
73. Having reviewed the claimed benefits of the proposed development I am of the view that on the basis of the information included in the application it is not possible to determine the value and weight that should be attached to them. As a result they can only be afforded limited weight. I have therefore concluded that the significant harm that the proposed development would cause to the horseracing industry would not be outweighed its benefits.
74. Despite what I have been able to establish about Newmarket's horseracing industry through my research and assessment there are relatively few references to it in the DCO application, nor to the impacts that the proposed development would have on it. More importantly, however, there appears to be no consideration or assessment of the industry's significance and value. Without such consideration a meaningful assessment of the development's impacts is not possible. The absence of absence and limited nature of these items demonstrates either a deliberate attempt to overlook the associated matters or multiple accidental oversights (which would be equally indefensible). Whatever their cause, these oversights have resulted in the failure of the application scheme to consider one of its most significant areas of impact. Had the proposed development's impact on the horseracing industry been assessed by the applicant it would have been shown to be significant and, at the very least, it would have been shown to threaten the long-term viability of the industry. All of the research and assessment that I have conducted has led me to this clear conclusion.
75. As a result of all of the above I can only conclude that the long term viability of the horseracing industry would be threatened by the proposed development and therefore that, in accordance with very clear direction of the relevant local planning policy, development consent should not be granted for it.

**APPENDIX 1 - ASSESSMENT OF IMPACT OF PROPOSED ENERGY FARM ON THE HORSERACING INDUSTRY
IN NEWMARKET AND THE IMMEDIATE SURROUNDING AREA**

Assessment of impact of proposed energy farm on the horseracing
industry in Newmarket and the immediate surrounding area
for
Say No To Sunnica Action Group & Newmarket Horsemen's Group

APPLICATION BY SUNNICA LTD FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR SUNNICA ENERGY FARM

November 2022

Our Ref: RMSP/21-01858

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This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2008.

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2 INTRODUCTION

- 2.1 Rapleys LLP are instructed by the Say No to Sunnica Action Group and the Newmarket Horsemen's Group (Appendix 1) to assess the possible impacts of the proposed Sunnica Energy Farm development on Newmarket's horseracing industry.
- 2.2 The purpose of this report is to identify the likely effects of the proposed Sunnica development on the horseracing industry in Newmarket, to assess the potential impacts of those effects and to consider the likely consequences of the impacts. A summary of the report's findings and its conclusions are set out in Section 11.
- 2.3 The scope of the assessment carried out is:
- A review of various sources dealing with the history and significance of the horseracing industry globally, in Britain and in Newmarket and the related significance of Newmarket;
 - A review of the Relevant Representations made to the Sunnica Energy Farm Examining Authority by entities involved in the Newmarket horseracing industry;
 - Interviews with key industry figures;
 - A high level desk based assessment of the likely effects of the proposed development on horseracing industry assets; and
 - Analysis and reporting on the findings of the foregoing.
- 2.4 Newmarket occupies an internationally recognised and crucial position within the horseracing world by virtue of its strong historical association within the sport. It is a valuable asset, unique to Britain, with international significance. This significance affords Britain and the town itself a commanding position in the horseracing world. However, since it catapulted the sport into the international sporting arena, Newmarket's fortunes have been mixed, demonstrating their vulnerability.
- 2.5 At the present time, due to its history and the unique racehorse breeding, training and racing cluster centred on the town, Newmarket enjoys a lofty position within the horseracing world but, due to the globalisation of sport, and the increasingly competitive nature of international sport, Newmarket faces more competition than ever for the investment on which it relies in order to maintain its position at the forefront of the sport. Unlike other forms of investment, this investment is largely footloose. It is subject to the instincts, impulses and perceptions of global investors and is not driven principally by profit but by seeking pleasure and enjoyment from the necessarily speculative racehorse breeding, training and racing activities in which they invest.
- 2.6 A relatively recently published study of the historical development of Newmarket Heath describes the racing landscape surrounding Newmarket as being "as near a sporting 'Valley of the Kings' as can be found, and one that is still in full working order". In terms of both the heath and the town itself Newmarket has considerable cultural heritage value as a living, breathing heritage asset as a result of its inextricable link with the horseracing industry (which is four centuries old and remains active in the current era). The industry also provides significant economic value to the town and to the region. It employs 8,500 people, it generates in excess of £200m of direct, indirect and induced economic activity and it attracts over 340,000 visitors to its two racecourses annually. It is therefore of upmost importance to consider carefully the possible effects of development proposed in and around Newmarket and the impact that it may have on the horseracing industry.
- 2.7 This report considers the significance of British horseracing and Newmarket's position within it before considering how secure that position is. It then goes on to consider how the horseracing industry is represented in the town in the form of physical assets (like stud farms and gallops), the significance of these assets, and how they would be likely to be

affected by the proposed Sunnica Energy Farm development were it to go ahead. The final part of the report deals with the impact that these effects may have on the horseracing industry assets identified as being likely to be significantly affected and, as a result, on Newmarket's horseracing industry as a whole.

3 SIGNIFICANCE AND IMPORTANCE OF HORSERACING AND BRITISH HORSERACING IN PARTICULAR

- 3.1 This section deals with the significance of the British horseracing industry. It is intended to provide the context required in order to fully understand Newmarket's role within the horseracing industry.

HISTORICAL AND CULTURAL SIGNIFICANCE

- 3.2 Horseracing both nationally and internationally has an extensive history and is of considerable significance historically and culturally. This is evidenced by the below.

- Horseracing has its roots in prehistory - it is one of the oldest sports (its basic premise - to identify which of two or more horses is the fastest over a set course or distance - having been mostly unchanged since at least classical antiquity) (https://en.wikipedia.org/wiki/Horse_racing, n.d.)
- Organised racing is thought to have begun in China, Persia, Arabia, and other countries in the Middle east and North Africa where early horsemanship became highly developed (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- Mounted bareback horseracing featured in the Olympic Games of Greece in the period 700 - 40 BCE. (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- Racing in medieval England began when horses for sale were ridden in competition by professional riders to display the horses' speed to buyers.
- During the reign of Richard the Lionheart (1189-99), the first known racing purse was offered, £40, for a race run over a 3-mile (4.8 km) course with knights as riders. (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- In the 16th century Henry VIII imported horses from Italy and Spain (presumably Barbs) and established studs at several locations. (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- In the 17th century James I sponsored horseracing meetings in England. (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- James I's successor, Charles I, had a stud of 139 horses when he died in 1649. (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- Charles II (1660-85) became known as "the father of the English turf" and inaugurated the King's Plates, races for which prizes were awarded to the winners. (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- Charles II's articles for the King's Plate races were the earliest national racing rules. (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- All thoroughbred horses are said to descend from three "Oriental" stallions (the Darley Arabian, the Godolphin Barb, and the Byerly Turk, all brought to Great Britain, 1690-1730) and from 43 "royal" mares (those imported by Charles II). (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)
- The pre-eminence of English racing and hence of the General Stud Book from 1791 provided a standard for judging a horse's breeding (and thereby, at least to

some degree, its racing qualities). (<https://www.britannica.com/sports/horse-racing/The-modern-age-of-racing>, n.d.)

SPORTING SIGNIFICANCE

3.3 In addition to its broader cultural significance, horseracing in the UK is today of considerable significance in a more specific sporting sense. This is evident from the below.

- Horseracing is the UK's second largest spectator sport, matched only by football with respect to annual attendances. (British Horseracing Authority, 6 September 2019)
- The UK's largest horseracing events are highlights of the domestic sporting and social calendar *and* the increasingly competitive international racing calendar. (British Horseracing Authority, 6 September 2019)
- Horseracing is the only sport that has two annual nationwide events - the Grand National and the Derby - which are included on the Group A list of full live coverage protected events for FTA broadcast. (British Horseracing Authority, 6 September 2019)
- In 2018, 5.77 million people attended over 1,500 individual race meetings held across England, Scotland and Wales, with approximately 40% being women. (British Horseracing Authority, 6 September 2019) (<https://www.racingexplained.co.uk/a-day-at-the-races/how-popular-is-horseracing/>, n.d.)

ECONOMIC SIGNIFICANCE

3.4 Aside from its historical, cultural and sporting significance, horseracing is economically very important to the UK and is of particular benefit to rural areas. This is clear from the below.

- Racing provides a unique combination of “pure” sport, a close interrelationship with the betting industry, deep links into the rural economy and a wider leisure offering to the British public. (Deloitte, September 2015)
- Horseracing is Britain's biggest sport after football in terms of taxation generated, employment and capital investment. (Deloitte, September 2015)
- Horseracing generates £3.45 billion in direct, indirect and associated expenditure annually for the British economy. (British Horseracing Authority, 6 September 2019)
- For the 12 months prior to September 2018 over £14 billion was bet on horseraces in Great Britain at racecourses, in licences betting offices and online (with 30% occurring in betting offices and 1.6% “on-course”). (British Horseracing Authority, 6 September 2019)
- British racing supports the Government's wider trading agenda by encouraging multi-billion-pound investment into the UK. (British Horseracing Authority, 6 September 2019)
- Much of horseracing's economic benefit is focused in rural areas with over 20,000 people employed across 59 licensed racecourses, hundreds of training yards and thousands of breeding operations - all of which play a key role in the life of the many hundreds of rural communities they operate in. (British Horseracing Authority, 6 September 2019)

INTERNATIONAL SIGNIFICANCE

3.5 British horseracing holds significance around the world. This is shown by the below.

-
- British horseracing is highly regarded on the international stage because of its rich history and perceived status. (Deloitte, September 2015)
 - Its heritage and reputation around the globe means that it continues to attract an increasingly diverse set of major international investors. (Deloitte, September 2015)
 - Racehorse ownership in Britain benefits from the 'aspirational' status it holds abroad, which is associated with its high social standing and the patronage of the Monarchy - this has been a major factor in attracting overseas investment in British Racing. (Deloitte, September 2015)
 - The quality of British racing is illustrated by:
 - 56 (14%) of the 406 performances listed as the best in the world in the 2014 World Thoroughbred Rankings being from British trained horses (Britain is therefore one of the leading nations for owners to train their horses).
 - Britain continuing to stage many of the world's leading races in terms of their quality (two of the top eight performances from horses anywhere in the world in 2014 were at British racecourses). (Deloitte, September 2015)

POLITICAL SIGNIFICANCE

3.6 In addition to and perhaps because of all of its other attributes, the political significance of horseracing to the UK is noteworthy. This is captured in the below.

- British racing supports the Government's wider trading and soft power agenda by encouraging multi-billion-pound investment into the UK. (British Horseracing Authority, 6 September 2019)
- In 2019 the Minister for Arts, Tourism and Heritage Rebecca Pow MP commented that:

"[British Horseracing] is also a significant soft power asset to the UK and enhances the strong bilateral relationships we have with the Gulf States and many other countries around the world." (British Horseracing Authority, 6 September 2019)

4 THE SIGNIFICANCE AND IMPORTANCE OF NEWMARKET WITHIN THE HORSERACING WORLD AND WITHIN THE BRITISH HORSERACING INDUSTRY IN PARTICULAR

4.1 As with the significance and importance of horseracing, Newmarket's significance and importance within the horseracing world is multifaceted. The various facets are considered below.

GENERAL

4.2 Newmarket holds a central position in the horseracing world. This is self-evident and well known to those within the industry but is likely much less so to those outside it. It is extensively evidenced by the below.

Status

- Newmarket is recognised as being the capital of the horseracing industry, both in national terms and in international terms. (Forest Heath District Council, 1995)
- It is the global headquarters and home of horseracing. (Sykes-Popham, Notes of interview with Simon Crisford, 2022) (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- It is not an overstatement to say that racehorse training and breeding at Newmarket is of worldwide renown. (The Jockey Club, 2022)
- It is incomparable and is what every racing centre in the world would like to be and models themselves on (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- It has reputation for excellence (built up over time across lots of specialisms). (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- No other town in the country contains such a concentration of facilities which, taken together with the gallops, stud farms, training grounds and racecourse, gives Newmarket its unique status. (Forest Heath District Council, 1995)
- It is the one place in the world that offers breeding, training and racing and the full gamut of related facilities and services - all at the highest level. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- The significance of Newmarket to English horseracing cannot be overstated. (Richard Hoggett Heritage, 2022)
- Today, the town is home to some eighty racing stables, housing more than 2,500 horses in training who make use of some 1,200 hectares (3,000 acres) of exercise grounds. (Richard Hoggett Heritage, 2022)
- Newmarket is recognised as being of considerable significance to the British horseracing industry, which plays a major economic and cultural role in the town. (Richard Hoggett Heritage, 2022)
- Newmarket is the largest racehorse training centre in the UK (having more than twice as many horses in training than the next largest training centre) (Deloitte, September 2015)
- Newmarket boasts many of Britain's top Flat trainers, part of the attraction of the training centre to many major racehorse owners. (Deloitte, September 2015)
- Its training facilities are the best in Britain and are internationally recognised. (Deloitte, September 2015)
- Its two racecourses stage a high quality fixture list paying competitive prize money and attracting over 340,000 annual attendees to the area. (Deloitte, September 2015)
- Its studs' high quality bloodlines mean it is the centre of the British Breeding industry, attracting horses and breeders from across Britain and internationally (Deloitte, September 2015)

- Newmarket is home to Tattersalls, the dominant bloodstock sales house in Europe which attracts a broad range of domestic and international customers to the town (Deloitte, September 2015)
- Newmarket is home to a number of internationally respected institutions that play a vital role in both supporting the Newmarket horseracing industry and selling British Racing (veterinary practices, The British Racing School, The National Stud, Jockey Club Rooms, British Horseracing Museum) (Deloitte, September 2015)
- There is no location in the world comparable to Newmarket in terms of scale, diversity and concentration of horseracing operations (Deloitte, September 2015)
- It is the largest racehorse [breeding and] training centre in world. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- There is nowhere else like Newmarket in any of the other top horseracing nations (Ireland, France, Dubai, Japan, Australia) (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Newmarket's current position at the top of the industry is evidenced by the fact that:
 - Dubawi & Frankel (the two best stallions in world) both stand at stud in/near Newmarket;
 - Frankel and Baaeed were both trained in Newmarket; and
 - The 2022 2000 Guineas and 1000 Guineas winners were both trained in Newmarket;
 - 4 out of 5 of the 2022 classics winners were trained in Newmarket (the winners of the 1000 Guineas Stakes, the 2000 Guineas Stakes, the Epsom Derby and St Leger Stakes) - each trained by a different Newmarket based trainer;
 - The 2022 winner of the Prix de L'arc de Triomphe was trained in Newmarket; and
 - The top three trainers in England, in terms of prize money won, are all based in Newmarket. (Sykes-Popham, Notes of interview with William Jarvis, 2022)

Offer

- Newmarket is recognised as being the headquarters of the horseracing industry. (West Suffolk Council, 2020)
- No other town in the country contains such a concentration of facilities which, taken together with the gallops, stud farms, training grounds and racecourses, gives Newmarket and the surrounding area its unique character and status. (West Suffolk Council, 2020)
- It has a unique assembly of horseracing interests covering all aspects of the Racing industry. (Forest Heath District Council, 1995)
- The historical association of these interests within the town, commencing with royal patronage under Charles I, has led to an unbroken relationship between the fortunes of the town and horseracing activity over the last 400 years. (Forest Heath District Council, 1995)
- The town has 2,500 acres of heathland gallops and 20 miles of all weather surfaces (all available for training horses). (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- It contains the headquarters of the Jockey Club, the sport's controlling body, and similar organisations for trainers and breeders. (Forest Heath District Council, 1995)
- In addition, it is the location of the Tattersalls' Sales Paddocks (Europe's leading bloodstock auctioneers) and a wide variety of closely related specialist bloodstock services, including veterinary health and research units (including three equine hospitals and 100 vets), commercial and financial services,

specialist suppliers, the National Stud and the National Horse Racing Museum. (Forest Heath District Council, 1995) (Richard Hoggett Heritage, 2022)

- Tattersalls attracts buyers from all over the world to Newmarket. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- Two of the five British Classics¹ are run at Newmarket (2,000 Guineas Stakes and 1,000 Guineas Stakes) (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- Newmarket's geology (chalk based soil) is particularly important from a breeding perspective since it is good for the development of young stock (because it is good for bone health)

Racehorse owners (investors)

- Newmarket is a magnet for racehorse owners, trainers, breeders and racegoers. (Sykes-Popham, Notes of interview with Christian Wall, 2022), particularly international investors (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- It is seen as the global headquarters for racehorse owners, trainers and breeders (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- The average annual cost to an owner of a horse trained in Newmarket is more than £25,000 which is significantly more than the national average, reflecting the quality of facilities and trainers in the town. (Deloitte, September 2015)
- The role Newmarket plays in attracting and keeping owners is therefore critical to the industry nationally. (Deloitte, September 2015)
- Newmarket is currently the headquarters of some of the largest international Racing organisations with interests across several countries and continents. (Deloitte, September 2015)
- Of the top 20 owners of British based flat racehorses in 2014:
 - 14 had a presence in Newmarket; and
 - More than 75% of the horses owned by these owners were trained in Newmarket. (Deloitte, September 2015)

Training

- Newmarket trainers represent a sizeable proportion of the top part of the Flat Trainers' Championship - in the past decade typically six to eight Newmarket trainers have been in the top 15. (Deloitte, September 2015)
- Newmarket trainers provide 20% or more of all Flat runners at 16 racecourses, illustrating the importance of the training centre to many British racecourses. (Deloitte, September 2015)
- Horses trained in Newmarket make up a significant proportion of winners at many of Britain's 37 Flat racecourses. (Deloitte, September 2015)

INTERNATIONAL SIGNIFICANCE

4.3 Newmarket's international significance as a training and racing centre is indicated by the below.

- "...it is as an equine cluster that Newmarket is known all over the world... Newmarket's position as the home of horseracing means there are more

¹ Five long-standing Group 1 horse races run during the traditional flat racing season.

racehorses, trainers, stable staff, stud farms and racing organisations based in and around the town than anywhere else in the world.” (Ramidus Consulting & CAG Consultants, 2021)

- In the research for their 2017 report (Newmarket’s Equine Cluster - The economic impact of the horse racing industry centred upon Newmarket - a short update to the 2014 report) SQW established that:
 - two leading trainers had, as an average, 75% of foreign-owned horses;
 - it was further surmised that, across the board, 50% or more of the horses in training probably have foreign owners; and
 - there has been a very significant increase in horses being bought in Newmarket to be raced abroad. (SQW, May 2017)
- More horses based in Newmarket run overseas than is the case with horses based at other training centres. (Deloitte, September 2015)
- A high proportion of overseas races won by Newmarket trained horses are Class 1 contests (40% in 2014), these being the highest quality races and reinforcing the point that Newmarket trained horses compete and regularly win on the highest stages internationally. (Deloitte, September 2015)
- British Racing is highly regarded on the international stage. (Deloitte, September 2015)
- Its heritage and reputation around the globe means that it continues to attract an increasingly diverse set of major international investors. (Deloitte, September 2015)
- With Flat racing being the much more international of the two horseracing codes (Flat Racing and Jump Racing), Newmarket, as the headquarters of British racing and dominated by the Flat code, is the natural focus for this international investment. (Deloitte, September 2015)

HISTORICAL AND CULTURAL SIGNIFICANCE

4.4 Newmarket’s importance within the horseracing world and within British horseracing is likely a function of its historical and cultural significance in the sphere. History and culture are usually linked to some extent but are very closely related in the case of Newmarket and horseracing. This central and underpinning aspect of Newmarket’s significance is detailed below.

- Newmarket has been a favoured place for horseracing for many centuries. Racehorses have been bred, owned and raced by the kings and queens of England who have supported and sponsored numerous race meetings at Newmarket.
- Although not a typical racing town, the significance of Newmarket to horseracing is derived from it being the place in which horseracing was codified in the 18th century and its becoming the favoured location of the most powerful decision-makers in horseracing society at that time. (Richard Hoggett Heritage, 2022)
- Its association with horseracing dates back over 400 years. (Jockey Club Estates, n.d.)
- Until the reign of James I horseracing had made little progress in England, while in Scotland it had become very popular, and the Scottish nobles - with whom James surrounded himself - lost no time in establishing the sport at Newmarket. (Lyle, 1945)
- Newmarket Heath was discovered by James I in 1605. (Deloitte, September 2015)
- He was attracted by the open land of the Heath as it possessed all the attributes needed to stage his and his courtiers’ favourite sporting activities (coursing, hawking, hunting and the riding and racing horses) and he made regular visits. (Jockey Club Estates, n.d.) (Richard Hoggett Heritage, 2022)
- Newmarket subsequently became known as the home of horseracing in England. (<https://www.greatbritishracing.com/about/history/>, n.d.)

- It was under James I that what was then only a village (a wood-built hamlet) became “Royal Newmarket”. (Lyle, 1945)
- This tradition continued under James I’s son, Charles I (r. 1625-49), and after a decline during the period of the Commonwealth, enjoyed fresh royal patronage under Charles II (r. 1660-85). (Richard Hoggett Heritage, 2022)
- The peak of Newmarket’s royal patronage was Charles II’s reign (1660 - 1685), during which time he built a palace and stables stretching from the High Street to Palace Street (what is left of the palace now forms part of the National Heritage Centre for Horseracing and Sporting Art, Palace House, and the King’s Yard). (Jockey Club Estates, n.d.) (Richard Hoggett Heritage, 2022)
- It was during this era that the first organised racing took place - leading to the founding of The Jockey Club in 1750. (Richard Hoggett Heritage, 2022)
- Originally it was a London-based social club but it leased a plot of land in Newmarket in 1752, on which the Jockey Club Rooms were subsequently developed, and the town became its focus of operations. (Jockey Club Estates, n.d.) (Richard Hoggett Heritage, 2022)
- Charles II instigated and won the first round of the Newmarket Town Plate in 1666; the race is now in its 352nd year and is one of the oldest horse races in the world. (The Jockey Club, n.d.) (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- Charles II probably also witnessed the birth of the first racing calendar, for as far back as 1670 one can read of a Calendar of Horse-racing set up at Newmarket, the author of which was John Nelson, and the price of which was half-a-crown. (Lyle, 1945)
- The Patronage of Charles II ultimately established Newmarket as the headquarters of English racing. (<https://www.britannica.com/sports/horse-racing>, n.d.)
- Newmarket’s greatest contribution to horseracing was to provide the stage on which an essentially Yorkshire creation, the thoroughbred, was projected from being largely a local matter to become one of national interest. (Oldrey, 2018)
- That process took something over a hundred years, culminating in the eighteenth century. (Oldrey, 2018)
- Racing briefly became very largely centred on Newmarket, to a degree not seen before or since, before it exploded, first nationally and then internationally, into the worldwide activity it is today. (Oldrey, 2018)

The Jockey Club

- The origins of The Jockey Club’s property and land management interests in Newmarket date back over 250 years. (Jockey Club Estates, n.d.)
- The Club has enjoyed proprietorship of part of Newmarket Heath since 1753. (Jockey Club Estates, n.d.)
- The Club’s Newmarket premises incorporate the Jockey Club Rooms. (Deloitte, September 2015)
- The Jockey Club Rooms remain at the very heart of British racing and the setting for many of the decisions that help shape the future of the sport. (Oldrey, 2018)
- The Rooms contain a unique and extensive history of British horseracing and often perform an important role in showcasing and promoting British Racing to existing or potential investors both national and international. (Deloitte, September 2015)
- The truly unique collection of sporting art and racing memorabilia displayed in the Rooms is the result of hundreds of years of gifts and bequests from members of the Jockey Club and their families. (Weatherby, 2018)

Sporting art

- In historic British art, pictures of horseracing (along with hunting) greatly outnumber any other sporting subjects. (Oldrey, 2018)
- Amongst the many thousands of pictures produced, and the innumerable prints to which they often gave rise, it is a fair guide to the importance of Newmarket in the development of the sport or horseracing from its earlier Northern roots that such a large proportion show horses on Newmarket Heath. (Oldrey, 2018)
- Every Stubbs painting with a recognisable racecourse background is set on the Heath. (Oldrey, 2018)
- Much the same goes for Stubbs's finest predecessors, Wootton and Seymour. (Oldrey, 2018)

ECONOMIC SIGNIFICANCE

4.5 Newmarket is significant economically in the horseracing world at all levels. This is evidenced by the below.

International economic significance

- Newmarket is used as a unique selling point for British Racing to international investors. (Deloitte, September 2015)
- It secures substantial inward investment from international investors, including £75m+ annual expenditure by the largest of these investors. (Deloitte, September 2015)
- It is the headquarters of many of the world's largest global racing investors - including Darley/Godolphin and Juddmonte. (Deloitte, September 2015)
- It is the home of Tattersalls, the largest bloodstock auction house in Europe. (Deloitte, September 2015)

National economic significance

- Over 1,000 registered racehorse owners have horses trained in Newmarket. (Deloitte, September 2015)
- c.28% of all British Flat/dual-purpose horses are trained in Newmarket, making it the largest UK training centre by a factor of 4. (Deloitte, September 2015)
- It is the driver and epicentre of the vital international investment in British horseracing; it also acts as an enabler for non-racing investment by the same parties. (Deloitte, September 2015)
- Newmarket racecourses' prize money is the largest in Britain. (Deloitte, September 2015)
- Newmarket is the centre of the British racehorse breeding industry - the progeny of Newmarket standing stallions are responsible for over 75% of prize money won by British bred horses. (Deloitte, September 2015)

Regional and local economic significance

- The horseracing industry is identified as a key component of the local economy, based in and around Newmarket. (West Suffolk Council, 2020)
- The industry employs 8,500 people directly and indirectly (3,285 directly) in Newmarket. (Deloitte, September 2015)
- It generates £208m of direct, indirect and induced economic activity within a 25-mile radius of the town. (Deloitte, September 2015) (Newmarket Neighbourhood Plan Steering Group, 2020)
- It attracts over 340,000 annual visitors to its two racecourses. (Deloitte, September 2015)

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- The horseracing industry is interwoven with the economic, social and environmental make-up of the town and its surrounding area (West Suffolk Council, 2020)
 - The Newmarket Equine Cluster Report identifies that the horseracing industry makes a very major contribution to the economy of Newmarket and the surrounding area. (West Suffolk Council, 2020)
 - The expertise built up over several hundred years has created a business sector worth more than £200m to the local economy and continues to present new opportunities for entrepreneurs. (Ramidus Consulting & CAG Consultants, 2021)

5 VULNERABILITY OF NEWMARKET'S POSITION IN THE HORSERACING WORLD

- 5.1 There are three key considerations here. The first is the factors that threaten Newmarket's horseracing industry. The second is the extent to which alternatives to Newmarket exist for investors, breeders, trainers, equine workers and equine professionals (including veterinary surgeons, nurses, chiropractors, scientists/researchers and others). The final consideration is the potential consequences for the industry if it is sufficiently threatened and alternatives do exist. These matters are dealt with in this section in that order.
- 5.2 Newmarket is the 'go-to' location for investors and professionals seeking the very best in horseracing. It holds the pre-eminent position of excellence in the horseracing world; its horses in training include some of the best in the world; its stallions and mares at its studs are some of the best in the world; the cluster of equine expertise found in a single location is generally considered to be the best in the world. It is important to recognise that the cluster is formed, at least primarily, not of companies and international conglomerates but of individuals, all of whom are relatively or totally footloose and can work in the horseracing industry anywhere in the world.
- 5.3 The concentration of investment and expertise is continuously under threat from the other major racehorse breeding, training and racing centres across the world, who are keen to entice equine investors and professionals in order to strengthen and grow their clusters. Examples of these other locations are Ireland (e.g. Co Kildare, Tipperary), France (e.g. Chantilly, Pau, Deauville), the USA (e.g. Kentucky, California), Australia (e.g. Victoria/Melbourne), the Middle East (Gulf States - e.g. Dubai, Qatar) and the Far East (e.g. Hong Kong, Japan, China).
- 5.4 Despite Newmarket's pre-eminent position its horseracing industry cannot be complacent - the prize money in Britain is low compared to the rest of the world and training costs comparatively high. Those who invest in Newmarket, and therefore make up the cluster, choose it because it is currently the best. Some have been enticed to invest or move elsewhere either in the UK or abroad (The Owner Breeder staff, n.d.), but the majority currently remain. If Newmarket became less attractive to the individuals who drive and form the cluster to invest, work and live in and around Newmarket, its pre-eminent position could easily be lost. Were that to occur, it would inevitably be far more difficult for Newmarket to regain its hard won and unique position that is so important not only to British racing but also to the local area, to the region and to the UK as whole.
- 5.5 It is important to realise that Newmarket has not always enjoyed the position within the horseracing industry that it holds today, even in relative recent times. It has not always enjoyed pre-eminence and the examples of the past provide confirmation that its position is not a given. The below extract from SQW's 2014 Newmarket's Equine Cluster report explains what has enabled the town to achieve its current position of pre-eminence.

The successful recent development of Newmarket's equine cluster and its strengths today are fundamentally down to the investors who have come into the area and built up large stud farms. Prior to their major investments most of the top stallions were exported to America. A healthy proportion is now retained in Newmarket and they are of fundamental importance for the whole cluster; for other stud farms, for the leading trainers, for the veterinary practices, for the horse transporters, for Tattersalls and, both directly and indirectly, for all the many firms which supply goods and services. (SQW, 2014)

- 5.6 The report then provides an example:

A recent stud purchase by an overseas investor, who is seen as a growing force in horseracing, is expected to lead to substantial investment and reinforcement of Newmarket's reputation for top quality horses. This underlines both the current attractiveness of the town and the importance of sustaining its appeal for internationally mobile equine establishments. (SQW, May 2017)

- 5.7 This makes clear that Newmarket's return to the top of the sport in recent times hinged on investors. It is therefore clear what will happen to Newmarket's Horseracing Industry if ongoing investment in it dwindles or is lost (whether from the industry altogether or through relocation).
- 5.8 The factors that have the potential to threaten Newmarket's position in the horseracing world, primarily through their impact on investment, are considered below.

DISCONNECT BETWEEN THE SIGNIFICANCE OF NEWMARKET & THE VALUE ACCREDITED TO IT

- 5.9 In his book, Royal Newmarket, R C Lyle captures effectively how well hidden the horseracing industry is in Newmarket (and therefore perhaps why it is overlooked and undervalued) and yet, what an active and intrinsic part of the town's identity it is. Despite the fact that the book was published in 1945 Lyle's observations remain true today. He states:

"Anyone coming to Newmarket today by car would never think it was the last stronghold of the horse. Its wide street has a surface peculiarly unsuited to horse traffic, and every other shop is a garage. But the thoroughbred is there, two thousand or more strong, though his presence may be little noticeable. This is only because the visible equine life of the town begins in the early morning, and ends before noon. Then the British thoroughbred comes once more into his own, as the strings wind away from the stables to the training grounds, and the classic heath trembles again to the thunder of flying hooves, as once it trembled beneath the scythed chariots of the Iceni."

- 5.10 This lack of awareness and understanding of Newmarket's significance in the horseracing world within some quarters, and the consequent undervaluing of it, particularly when it comes to those responsible for decisions affecting Newmarket's future, is a significant threat to the town. While it was presented as a missed opportunity by Deloitte's 2015 Newmarket Horseracing Industry report, rather than the threat that it would appear to be in the context of development proposals like Sunnica that fail to grasp the significance and value of Newmarket's horseracing industry, it was nevertheless acknowledged:

While Newmarket's reputation for horseracing excellence is acknowledged within the British and global racing industry, it would be advantageous for this status to be better understood outside of racing via appropriate regional, national and international channels (Deloitte, September 2015)

IMPACT OF DEVELOPMENT ON THE HORSERACING INDUSTRY IN NEWMARKET

- 5.11 Development, both individually and cumulatively, has the potential to negatively impact Newmarket's horseracing industry. The industry is therefore concerned to ensure that major new development does not have an unacceptable impact, as can be seen from the below.
- Concerns about wider conflicts between equine and other planning interests have arisen previously. (Deloitte, September 2015)

- These have been expressed through representations made at the Hearings into development plans being formulated (particularly the Development Management Policies DPD). (Deloitte, September 2015)
- Concerns have also been raised as to whether major new residential development in Newmarket will alter the perception and image of the town, such as to prejudice its position as an international centre for horseracing and the equine industry. (Deloitte, September 2015)
- Another concern is the damaging consequences of the additional traffic generated by major new residential areas, particularly where there are horse road-crossings. (Deloitte, September 2015)
- The concern stems from the fact that Newmarket is becoming increasingly urbanised and congested, which is making it harder and less pleasant for the horseracing industry to carry out its day-to-day activities (NB consistency is key in racehorse training - these regular activities, e.g. training sessions, are essential for success) (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- It is imperative that all is done to avoid causing potential harm to the major benefits that the horseracing industry brings to the area, by avoiding and not imposing upon it harmful challenges and changes outside its control. (The Jockey Club, 2022)

EXAMPLES OF THREATS TO AND DECLINE OF SIMILAR EQUINE CLUSTERS

5.12 An example of a diminished horseracing centre and another example of a significant but averted threat to a horseracing centre (though possibly not without consequence) have been identified by this study. These are set out below. They illustrate the impact that development and, possibly, simply the threat of it, may have on equine clusters.

- Epsom has declined as a training centre in recent years, with the number of horses using the now Jockey Club Estates managed training grounds falling by 18% between 2010 and 2014. (Deloitte, September 2015)
- The area's relative decline is likely to have been due, at least in part, to significant urbanisation and wider public access to the Training Grounds. (Deloitte, September 2015)
- The issue of open-cast mining in the Hunter Valley region of Australia led to the leading global bloodstock operations of Darley and Coolmore joining forces to campaign against the threat. (Deloitte, September 2015)
- The perceived risk reportedly deterred Qatar Racing from investing in the area. (Deloitte, September 2015)
- The mining application was eventually refused due to concerns it would negatively impact the horseracing industry. (Deloitte, September 2015)

THE NATURE OF HIGH NET WORTH INVESTMENT IN THE HORSERACING INDUSTRY

5.13 The following provide some useful background on this matter.

- The horseracing industry depends upon continued investment in racehorses and racehorse training and breeding, including, in particular, from high net worth individuals who are footloose and can invest practically anywhere in the world. (The Jockey Club, 2022)
- The choice such investors have is wide, their choice is one not only of the different places in the world where they can invest, but is also one involving the many different sports and leisure pursuits available to them. (The Jockey Club, 2022)

- Horseracing centres worldwide therefore compete not only with each other for this investment but also with other opportunities for leisure and sport investment both in the UK and abroad. (The Jockey Club, 2022)
- Investors won't invest in Newmarket just because it's Newmarket. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- If they perceive that Newmarket will be negatively impacted to the extent that alternative locations might provide a better offer they will look elsewhere. (Sykes-Popham, Notes of interview with Simon Crisford, 2022) (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)

5.14 A relatively high profile example of how this investment takes place (in this case at a significant scale) is that of Ibrahim Araci's relatively recent entry into the horseracing world. An article on Thoroughbred Daily News reads:

- When it came to location, Newmarket was always going to be the UK base for the Araci family; after all it was at the Rowley Mile during Guineas Weekend that their involvement in horseracing began. Ibrahim Araci, a safe 2,500 miles away in Istanbul, was blissfully unaware as his daughter Pinar cheered home Cockney Rebel (Ire) (Val Royal) to win the colts' Classic in 2007, sparking an interest that would become an expensive hobby for years to come.
- "When I was at Reading University my best friend owned an arable farm just outside Newmarket and I went over to visit," says Pinar Araci. "She invited me for the weekend and told me there was great racing. I had no idea that it was Guineas weekend or even what the Guineas were, but she took me racing and I absolutely loved it. I even stayed for a couple of extra days. I visited Tattersalls and stud farms nearby and by the time I left, I was hooked.
- "Later that year we decided to get involved because by then I had managed to convince Dad that it was a good idea. In December 2007, we came to Tattersalls and bought our first mares. By May 2008, we had bought a farm in Turkey." (Steele, 2020)

5.15 Their investment didn't stop with the purchase of the mares. The Aracis bought Old Mill Stud in Chippenham² in 2019 for £1.79 million. The same article reads:

- "We have been looking for the right farm in the Newmarket area for quite a few years now," says Speers. "It's taken time to find what we thought was the right property. When Old Mill came on the market about 18 months ago, I took Mr. Araci and Pinar around and all three of us agreed that it was the right place. We were lucky to be able to secure it."

WHAT ARE THE CHALLENGERS TO NEWMARKET AND WHY?

5.16 The Jockey Club's Relevant Representations made in relation to the Sunnica DCO examination explain that Newmarket's position in the horseracing world is always facing competition, in particular from Ireland, France and the USA. It should also be noted that it faces growing competition from Australia, the Far East and the Middle East.

² While not covered in this report because it is not within or immediately adjacent to Newmarket, Old Mill Stud is likely to be one of the horseracing industry assets more significantly affected by the proposed Sunnica Energy Farm Development (see Appendix 2 - Notes from interview with William Jarvis). Various parts of the proposed development would be less than 2km from it, starting to the north and continuing clockwise all the way round to the southwest.

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- 5.17 Experienced and accomplished trainer Simon Crisford cautions that anywhere in the world that can offer a better environment and facilities than Newmarket for breeding and training racehorses is a challenger to it. (Sykes-Popham, Notes of interview with Simon Crisford, 2022). Further views and explanations are provided below.

Challengers abroad

Ireland

- Because it has a very strong breeding industry. (Sykes-Popham, Notes of interview with William Jarvis, 2022)

Chantilly, France

- Because of its proximity and the higher prize money on offer (Sykes-Popham, Notes of interview with William Jarvis, 2022)

The Middle East (where significant investment is occurring)

- Because:
 - Horses can be and are trained in the Middle East but a lot are still trained in Newmarket, even if they race in the Middle East;
 - If Newmarket loses its position and/or appeal, training of these horses may increasingly move to the Middle East. (Sykes-Popham, Notes of interview with Christian Wall, 2022)

Hong Kong

- Because the horseracing industry in Hong Kong is doing well at the moment. (Sykes-Popham, Notes of interview with William Jarvis, 2022)

Australia

- Because:
 - Racing is becoming increasingly lucrative. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
 - There is plenty of space/countryside for training horses. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
 - Because the horseracing industry in Australia is doing well at the moment. (Sykes-Popham, Notes of interview with William Jarvis, 2022)

Challengers within the UK

Lambourn (Berkshire), Malton (Yorkshire) and Middleham (Yorkshire)

- Because these are Britain's other racehorse breeding and training centres with which Newmarket naturally competes (but currently leads by virtue of its size and offer). (Sykes-Popham, Notes of interview with Christian Wall, 2022)

POTENTIAL CONSEQUENCES FOR NEWMARKET IF IT IS SUFFICIENTLY THREATENED

- 5.18 Given that alternatives to Newmarket do exist is it important to consider the potential consequences for its horseracing industry if it is sufficiently threatened. These are reasoned below.
- Newmarket is only as secure as the investment it can attract. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
 - It only takes one major investor to choose not to invest in Newmarket for substantial harm to be caused. (The Jockey Club, 2022)

- That investor is not identifiable by the very nature of footloose investment. (The Jockey Club, 2022)
- Newmarket is currently the headquarters of some of the largest international Racing organisations with interests across several countries and continents (including the Curragh and Chantilly). (Deloitte, September 2015)
- The global nature of these operations means it is possible to re-distribute horses and activities relatively easily, hence it is important for Newmarket and British racing that its current advantages are protected. (Deloitte, September 2015)
- (West Suffolk Council, 2020) (West Suffolk Council, 2022) (Newmarket Neighbourhood Plan Steering Group, 2020) If development continues to impact Newmarket, or it is perceived that it will do so, investors will start to move their interests to other locations, meaning that Newmarket, and its position at the top of the horseracing world, will start to suffer. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- The economy of the town of Newmarket is dependent on a thriving equine industry (The Jockey Club, 2022) meaning that the whole town will suffer if its racing industry goes into decline.

WHAT IS REQUIRED IN ORDER TO PROTECT NEWMARKET'S POSITION?

5.19 As West Suffolk Council has identified in its emerging local plan, "The protection of the horse racing industry is paramount" (West Suffolk Council, 2022). The industry is in agreement on and is clear about what is required to protect Newmarket's position in the horseracing world. This is detailed below.

- The relevant part of the principal objectives of Jockey Club Estates as stated in 2015 in this regard was: "*the continued investment in ... the continuing popularity and importance of Newmarket to the Horseracing industry worldwide*". (Deloitte, September 2015)
- Constant work is required by the whole industry within and around the town to demonstrate that Newmarket is the best place in the world for breeding, training and racing horses and to attract and retain owners. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- The experience for investors, visitors, workers and the local community alike needs to be positive. (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- The aim is to maintain a safe and secure environment in which horses can be bred and trained. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- Foreign investors need to feel that their horses are getting the very best in Newmarket (and therefore that they aren't compromising their racing interests in any way by keeping their horses in the town). (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- The industry accepts that change in and around the town is inevitable and is necessary but the change needs to be sustainable and positive. (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- Newmarket's appeal to internationally mobile equine establishments must be sustained. (SQW, May 2017)

6 PHYSICAL REPRESENTATION OF THE HORSERACING INDUSTRY IN NEWMARKET

- 6.1 This section identifies the places, premises, facilities, routes and institutions that are the physical representation of the horseracing industry in and around Newmarket. Being located close to the application site, either within or in close proximity to the town, means that these horseracing industry assets may have the potential to be affected by the proposed Sunnica Energy Farm development.
- 6.2 The relevant horseracing industry assets are as follows.
- The most readily apparent aspects of the racing industry in and around Newmarket are:
 - the training grounds - circa 1000 hectares (2500 acres), which include the historic Limekilns, Water Hall and Railway Field gallops;
 - the horse walks that link the training grounds and the yards;
 - the racecourses (2 no.);
 - the Jockey Club Rooms; and
 - Tattersalls (bloodstock auction house and grounds).
 - Less obvious/more hidden away are:
 - the training yards (providing circa 4,000 boxes and home to circa 85 trainers);
 - the supporting services (vets, farriers, equine suppliers etc);
 - the National Horseracing Museum;
 - public rights of way used by the horseracing industry.
 - On the edge of Newmarket and beyond are:
 - the stud farms.
- 6.3 The locations and coverage of Jockey Club land (primarily training grounds and racecourses) are shown on the Jockey Club Estates 2015 plan at Appendix 3. The training grounds are divided into two halves, Racecourse side to the west and Bury side to the east, and are linked to and across the town by horse walks. The Bury side training grounds are closest to the main parts of the proposed Sunnica Energy Farm site, with the historic Limekilns, Water Hall and Railway Field overlooking Sunnica West Site A, which lies on lower ground.
- 6.4 The locations and coverage of the private training grounds, studs, trainers' yards and Tattersalls are shown on the Newmarket Studs Plan at Appendix 4.
- 6.5 It is worth noting the following about the training grounds (most of which are owned and maintained by the Jockey Club):
- The building and maintenance of gallops is expensive and can act as a barrier to entry for new trainers. (Deloitte, September 2015)
 - The use of central training facilities such as those offered in Newmarket is therefore a great aid to trainers, particularly those starting out in their careers. (Deloitte, September 2015)
 - Jockey Club Estates spends c.£2m each year to maintain the Newmarket training grounds to the highest standards. (Deloitte, September 2015)
 - Capital expenditure accounts for in the region of £300,000 of the c.£2m total expenditure on training grounds maintenance. (Deloitte, September 2015)

7 RELATIONSHIP BETWEEN SUNNICA SCHEME AND HORSERACING INDUSTRY ASSETS

- 7.1 This report considers the impact of the proposed Sunnica Energy Farm development on the horseracing industry. An important part of this is any potential impacts the scheme will have on the physical assets of the horseracing industry in and around Newmarket.
- 7.2 This section considers the nature of the possible relationships between the proposed Sunnica Energy Farm scheme and the horseracing industry assets that would lie in the vicinity of it if it were to be delivered.

PROXIMITY

- 7.3 A comparison of the “Figure 2-1 Order Limits” plan forming part of the Sunnica Energy Farm DCO application (drawing number: 60589004_ES_DAS_001) (Appendix 5), the Jockey Club Estates 2015 plan (Appendix 3), the Newmarket Studs Plan (Appendix 4) and Ordnance Survey mapping for the area shows that the following horseracing industry assets would be closest to the proposed Sunnica Energy Farm if it were to be delivered:

- Chippenham Estate (0 metres)
- Public right of way 204/5 (bridleway running SE-NW between Chippenham/Snailwell Gallops and Sunnica West Site A) (0 metres)
- Godolphin’s Chippenham/Snailwell Gallops (20 metres)
- Arran House Stud (> 50 metres)
- St Simon Stud (75 metres)
- The following Jockey Club training grounds:
 - > The Railway Field (60 metres)
 - > Water Hall (100 metres)
 - > The Limekilns (250 metres)

INTERVISIBILITY

- 7.4 The topography of the local landscape may mean that (subject to the presence and density of existing vegetation) the Sunnica Energy Farm scheme is visible from the above listed horseracing industry assets and the following further horseracing industry assets:

- The following Jockey Club training grounds:
 - > Bury Hill
 - > Long Hill
 - > Warren Hill
 - > Side Hill
- Godolphin’s Moulton Paddocks complex
- Former Animal Health Trust site
- Lanwades Stud
- The British Racing School
- Woodland Stud
- Longstones Stud

- 7.5 The geographical relationship between all of the above assets and the proposed Sunnica Energy Farm site is shown on the plan at Appendix 6.

ASSESSMENT OF POSSIBLE RELATIONSHIPS

7.6

Table 1 below assesses the potential relationships between the proposed Sunnica Energy Farm development and the horseracing industry assets identified above.

Table 1: Potential relationships between the proposed Sunnica Energy Farm and the horseracing industry assets identified for reasons of proximity or potential intervisibility

Asset	Proximity (closest point of Sunnica site to closest point of asset)	Intervisibility	Possible effects	Likely magnitude of possible effects	Likely magnitude of combined effects
Chippenham Estate	0 metres	Yes	Change of use and numerous other direct effects as a result of being part of the application site	Very high	Very high
Public right of way 204/5 (bridleway running SE-NW between Chippenham/ Snailwell Gallops and Sunnica West Site A)	0 metres	Yes	<ul style="list-style-type: none"> Noise^{**^} Dust[*] Landscape and visual^{**^} Glint and glare[^] Busyness, movement and activity[*] 	High High Medium/high [§] Medium/high Medium	Medium/high
Godolphin's Chippenham/ Snailwell Gallops	20 metres	Yes	<ul style="list-style-type: none"> Noise^{**^} Dust[*] Landscape and visual^{**^} Glint and glare[^] Busyness, movement and activity[*] 	High High Medium/high [§] Medium Medium	Medium/high
Arran House Stud	< 50 metres	Potential	<ul style="list-style-type: none"> Dust[*] Noise Busyness, movement and activity[*] Landscape and visual^{**^} Glint and glare[^] 	High Medium/high Medium/high Medium Medium	Medium/high
St Simon Stud	75 metres	Potential	<ul style="list-style-type: none"> Landscape and visual^{**^} Busyness, movement and activity[*] Dust[*] Glint and glare[^] 	Medium/high Medium/high Medium Medium	Medium
The Railway Field	60 metres	Yes	<ul style="list-style-type: none"> Dust[*] Landscape and visual^{**^} Busyness, movement and activity[*] Glint and glare[^] 	Medium Low/medium [§] Low/medium Low/medium	Low/medium
Water Hall	100 metres	Yes	<ul style="list-style-type: none"> Landscape and visual^{**^} Busyness, movement and activity[*] Glint and glare[^] Dust[*] 	High [§] High Medium Medium	High
The Limekilns	250 metres	Yes	<ul style="list-style-type: none"> Landscape and visual^{**^} 	High [§]	High

			<ul style="list-style-type: none"> • Busyness, movement and activity* • Glint and glare^ • Dust* 	High Medium Medium	
Bury Hill	1080 metres	Potential	<ul style="list-style-type: none"> • Landscape and visual**^ • Glint and glare^ 	Negligible/low Negligible/low	Negligible/low
Long Hill	1650 metres	Potential	<ul style="list-style-type: none"> • Landscape and visual**^ • Glint and glare^ 	Negligible/low Negligible/low	Negligible/low
Warren Hill	2450 metres	No	<ul style="list-style-type: none"> • Landscape and visual**^ 	Negligible/low	Negligible/low
Side Hill	2800 metres	No	<ul style="list-style-type: none"> • Landscape and visual**^ 	Negligible/low	Negligible/low
Godolphin's Moulton Paddocks complex	975 metres	No	<ul style="list-style-type: none"> • Landscape and visual**^ • Glint and glare^ 	Negligible/low Negligible/low	Negligible/low
Former Animal Health Trust site	1000 metres	Potential	<ul style="list-style-type: none"> • Landscape and visual**^ • Glint and glare^ 	Negligible/low Negligible/low	Negligible/low
Lanwades Stud	1500 metres	Potential	<ul style="list-style-type: none"> • Landscape and visual**^ • Glint and glare^ 	Negligible/low Negligible/low	Negligible/low
The British Racing School	130 metres	Potential	<ul style="list-style-type: none"> • Dust* • Landscape and visual**^ • Glint and glare^ • Busyness, movement and activity* 	Medium Negligible/low Negligible/low Negligible/low	Negligible/low
Woodland Stud	340 metres	Potential	<ul style="list-style-type: none"> • Landscape and visual**^ • Glint and glare^ • Dust* 	Negligible/low Negligible/low Medium	Negligible/low
Longstones Stud	1000 metres	Potential	<ul style="list-style-type: none"> • Landscape and visual**^ • Glint and glare^ • Dust* 	Negligible/low Negligible/low Negligible/low	Negligible/low

* construction phase

^ operational phase

§ taken from "Landscape and Visual Issues relating to the Sunnica Energy Farm" (Michelle Bolger Expert Landscape Consultancy, 2022)

7.7 Because there are many horseracing industry assets within relatively close proximity to the Sunnica Energy Farm site a significant number are assessed in Table 1. The impacts on many of these assets will be limited due to topography and intervening vegetation or infrastructure, or both. However, some assets are likely to be impacted significantly. This report focuses on these assets (i.e. those most likely to be impacted significantly) when considering the physical assets-related impacts of the Sunnica development (as part of the total impact of the scheme on the industry).

7.8 The assets most likely to be impacted significantly, as can be seen from Table 1, are (in order of the likely magnitude of impact anticipated):

- Chippenham Estate - very high magnitude of impact anticipated;
- The Limekilns - high magnitude of impact anticipated;
- Water Hall - high magnitude of effect anticipated;

-
- Public right of way 204/5 (bridleway running SE - NW between Chippenham/Snailwell Gallops and Sunnica West Site A) - medium/high magnitude of effect anticipated;
 - Godolphin's Chippenham/Snailwell Gallops - medium/high magnitude of effect anticipated;
 - Arran House Stud - medium/high magnitude of effect anticipated;
 - St Simon Stud - medium magnitude of effect anticipated; and
 - The Railway Field - low/medium high magnitude of effect anticipated.

7.9 The significance of these assets and the likely effects on them are considered further in the following sections with the exception of Arran House Stud and St Simon Stud, which are private stud farms. All of the assets listed are likely important to Newmarket's horseracing industry but resources have been focused on what are likely to be the most significant assets among them, i.e. those closest to the town, those with particular heritage and landscape value, those with public access and those with significant capital spent on maintaining and improving them on an ongoing basis.

8 SIGNIFICANCE OF HORSERACING INDUSTRY ASSETS LIKELY TO BE IMPACTED

GENERAL

8.1 Before considering the significance of the horseracing industry assets likely to be impacted it is helpful to consider the significance of their context. This is detailed below.

- Unlike the great majority of towns of its size and antiquity, Newmarket is unusual in having developed on a site where there is no river or even stream of any consequence. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The main reason for this is the excellent drainage through the deep layer of chalk underlying the Heath, obviating the need for a watercourse for that purpose. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The drainage, allied to the rise and fall of the topography around the small and already far from new market town, made it ideal for training and racing horses once the Royal Court had fixed on the town as its preferred holiday camp (from the early 17th century). (David Oldery, Timothy Cox & Richard Nash, 2016)
- Over the last five centuries, the Heath and not the racecourse has been the single most important factor in the town's development - after all, there are over 50 towns that boast a racecourse, but none that has the Heath or anything to compare with it. (Prescott, 2015)
- The size of the area laid out around Newmarket as gallops provides a range for trainers which can have no equal. (David Oldery, Timothy Cox & Richard Nash, 2016)
- Indeed, it is believed that, at over 2,500 acres including the racecourses, the Heath is the largest expanse of cultivated heathland in the world. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The Heath provides a combination of hills suitable for training horses on each side of the town with the possibility of laying out a course over eight miles avoiding anything unreasonably steep, all on free-draining soil - this almost seems like divine providence in action; it would certainly be hard to improve on it. (David Oldery, Timothy Cox & Richard Nash, 2016)
- It is these training areas (together with the racecourses) comprising the modern day Heath, that brought the trainers, the staff, the owners and the horses, and with them followed ancillary businesses - veterinarians, saddlers, forage merchants, blacksmiths, sales companies, bloodstock agents, as well, of course, as the development of the surrounding land to accommodate the great studs that now surround the town. (Prescott, 2015)
- The value and significance of the Heath and the organisations with an interest in it are what has repeatedly secured its preservation.
- For over three centuries the Heath has been protected from agriculture, the demands of two World Wars and the development of the modern transport system, with even the railway line forced to tunnel underneath and new roads being built around it. (Jockey Club Estates, n.d.)
- In 1851, as a result of the Jockey Club's efforts, the new railway line was bored through a tunnel over half a mile in length to avoid disrupting the most important parts of the Heath. (Prescott, 2015)
- The desire to preserve the Heath was what saved the town from being subsumed by 'over-spill' in the mid-20th century. (Prescott, 2015)
- The route of the A45 (now A14) dual carriageway was sent two-and-a-half miles out of its way to go round the Heath, countering a serious attempt to send it straight through the middle. (Prescott, 2015)
- During two world wars not an acre of the principal gallops was ploughed for the war effort. (Prescott, 2015)

- The Heath is owned by Jockey Club Estates, whose ownership extends to some 4,500 acres, which includes the two racecourses (the Rowley Mile and the July Course), 2,800 acres of training grounds, three stud farms, a farm, residential properties, 20 commercial properties and the Jockey Club Rooms. (Richard Hoggett Heritage, 2022)
- This concentration of power has resulted in the identification of the town with the horseracing industry, which dominates its landscape and daily routines as much today as it has for the last 200 years. (Richard Hoggett Heritage, 2022)

8.2 The next part of this section considers the significance of the horseracing industry assets likely to be impacted by the proposed Sunnica Energy Farm development.

CHIPPENHAM ESTATE

8.3 A circa 8.8 hectare parcel of the Chippenham Estate that lies immediately east of the village of Snailwell is divided up into paddocks and has previously been used as stud land. It lies immediately almost immediately adjacent to Godolphin's Chippenham/Snailwell Gallops complex (separated only by public right of way 204/5) and the tree belt running alongside it.

8.4 The land is indicated on the Newmarket Stud Plan produced in 2015 (Appendix 4). Its use as stud land is understood to have been the subject of a lease to the Godolphin racehorse breeding and training operation and has now ceased.

8.5 During a site inspection carried out for the preparation of this report in July 2022 the land was being used for grazing cattle. Notwithstanding this fact the land presumably may still be suitable for stud use.

8.6 The East Cambridgeshire Local Plan seeks to prevent development having an adverse impact on the horseracing industry and harming the long-term viability of operational studs and other racing facilities, and the racing industry as a whole.

8.7 By virtue of the fact that the land provides 8.8 hectares of space within close proximity of Newmarket and almost immediately adjacent to an operational horseracing training facility (and was until relatively recently was employed for stud purposes) it may still be of significance to the horse racing industry.

THE LIMEKILNS

8.8 The Limekilns are of considerable significance to the Newmarket horseracing industry. This significance is multifaceted and is detailed and evidenced below. In addition, the Limekilns' cultural, heritage and landscape significance, together with that of the other parts of the landscape north of Newmarket, is evidenced and crystallised in a number of significant artworks of various ages. Examples of these are presented in Appendix 7.

General

- The size of the area laid out around Newmarket as gallops provides a range for trainers which can have no equal. (David Oldery, Timothy Cox & Richard Nash, 2016)
- It is believed that, at over 2,500 acres including the racecourses, the Heath is the largest expanse of cultivated heathland in the world. (David Oldery, Timothy Cox & Richard Nash, 2016)
- Newmarket became everything we know Newmarket to be now because of the wide-open expanses of grass outside the town, and no area of the Bury side of the Heath sums it up better than the Limekilns. (Thoroughbred Daily News/John Berry, n.d.)

- The Limekilns are of crucial importance as they provide the best gallops on the Heath for fast work in summer, plus an extension towards Kentford known as Water Hall. (David Oldery, Timothy Cox & Richard Nash, 2016)
- Decades of working peat moss into the sward on the Golden Mile and Long Straight have produced a surface perfectly adapted for use in dry weather. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The process began about a century ago, and the subsoil now contains a considerable element of peat in its top six inches. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The Limekilns provides hundreds of acres of absolutely pristine, centuries old, perfect grassland. (Thoroughbred Daily News/John Berry, n.d.)
- At up to 12 furlongs of turf, spread over 200 acres, the Limekilns can lay claim to be among the best set of grass gallops in the world. (The Jockey Club Estates, n.d.) (The Jockey Club Estates, n.d.)
- Every summer for centuries this is where the horses of Newmarket, including the famous ones, have come to do their fast work. (Thoroughbred Daily News/John Berry, n.d.)
- Because of the combination of their layout, topography and the quality of the turf they are very popular - much more so than the other gallops in Newmarket. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- The Limekilns provide an exceptional training facility through the quality of the grass gallops, their length (at 1 ½ miles) and their gentle gradient. (Tattersalls Ltd, 2022)
- The fact that they are relatively flat allows the horses to extend themselves a bit more than on Newmarket's hillier gallops but the gentle gradient is still sufficient to work them. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- The Limekilns comprise four gallops (The Golden Mile, Round Gallop (1 ¾ miles including two bends), Short Gallop, Long Gallop (1 ½ miles in a straight line)) and a canter. (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- There are two special gallops (for which trainers have to pay extra) - the Golden Mile and the Round Gallop; these are typically used 800 - 900 times a year and 500 - 725 times a year respectively (when one considers that the Limekilns are only open from April to September this gives you an idea of how intensively they are used). (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- The Golden Mile is only available for serious work on request, usually by useful horses, and the Limekilns in general are always withdrawn from use if the ground gets soft, to avoid damage. (David Oldery, Timothy Cox & Richard Nash, 2016)
- So valuable and important are the gallops surrounding Newmarket considered to be, and the Limekilns foremost amongst them, that there is a long history of infrastructure projects being modified in order to preserve them and their setting. (Richard Hoggett Heritage, 2022)

Heritage and cultural significance

- Newmarket's Heath is managed by Jockey Club Estates and has been at the heart of the worldwide sport and industry of thoroughbred horseracing since the 17th century. (David Oldrey & Timothy Cox)
- The Newmarket landscape is the horseracing equivalent of the industrial revolution related World Heritage Sites such as Saltaire, New Lanark, and Derwent Valley Mills. (David Oldrey & Timothy Cox)
- It seems that the Limekilns have been actively used as gallops since at least the early 19th century and probably longer. (Richard Hoggett Heritage, 2022)

- The Jockey Club leased the Limekilns and Water Hall ((together with the Railway Field) from the Chippenham Estate as exercise grounds from 1840. (David Oldery & Timothy Cox)
- The name is derived from the original use of the area for pits in which to burn chalk to produce lime. (David Oldery, Timothy Cox & Richard Nash, 2016)
- Although the land was only rented in 1840, Mr Petitt, foreman of the day on Bury Side, was allowed £55 to pay for the cost of filling the pits - for which every trainer of a Derby winner from the town since then should be grateful as all must have used this splendid gallop in the days before their charges triumphed. (David Oldery, Timothy Cox & Richard Nash, 2016)
- When the railway was constructed to the north of the town in 1851 it was routed to the north of the Limekilns gallops in order to ensure their preservation. (Richard Hoggett Heritage, 2022)
- The Jockey Club eventually bought the Limekilns and Water Hall from the Tharp Family in 1932 as part of a deal worth £75,000. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The Limekilns are an important element of the historic racing landscape which surrounds Newmarket, and the historical relationship between the gallops and the adjacent estate of Chippenham Park to the north adds to this significance. (Richard Hoggett Heritage, 2022)
- Although not formally recognised through heritage designations, it is considered that the Limekilns gallops constitute significant features of the historic environment and they comprise non-designated heritage assets. (Richard Hoggett Heritage, 2022)
- The views northwards from the Limekilns and the open agricultural landscape within which the Limekilns gallops are currently experienced are an important part of their setting. (Richard Hoggett Heritage, 2022)
- The deliberate creation and management of the gallops, the longevity of their use and the fact that generations of horses have continued to be trained in much the same fashion and same location for centuries gives the Limekilns considerable significance in cultural heritage terms. (Richard Hoggett Heritage, 2022)
- One recently published study of the historical development of Newmarket Heath describes the racing landscape surrounding Newmarket as being “as near a sporting ‘Valley of the Kings’ as can be found, and one that is still in full working order” - it is a truly unique place (David Oldery, Timothy Cox & Richard Nash, 2016)
- Given the regional and national significance of the Limekilns gallops, it is concluded that they should be considered to be of medium heritage value, akin to that of the neighbouring Chippenham Hall and the surrounding Grade II listed buildings. (Richard Hoggett Heritage, 2022)
- With a landscape so well preserved for centuries, essentially unchanged apart from the introduction of numerous shelter belts, the place does have an appeal which is both timeless and slightly mysterious.
- All sorts of legends and mysteries have proliferated as a result, from the regularly reported sightings of a spectral Fred Archer on his horse, to wondering who may have been buried in ‘The Boy’s Grave’. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The latter is at least finite, lying as it does at the far end of Water Hall and flowers have quite regularly been laid on it, supposedly reflecting a gypsy origin. (David Oldery, Timothy Cox & Richard Nash, 2016)

Sporting significance

- The Limekilns Gallops include the Round Gallop, this is a curve around which horses can be worked in reverse, i.e. left handed, in preparation for the Epsom Derby (the

only such facility that exists, making it very a very important one for Derby trials horses and their owners and trainers). (Prescott, 2015)

- It is where winners of many of the most prestigious horse races in the world have trained since the early 18th century, including winners of the July Cup at Newmarket, the Gold Cup and Champion Stakes at Ascot, the Epsom Derby, the Arc de Triomphe in France, the Breeders Cup in America and the Melbourne Cup in Australia. (The Jockey Club, 2022)

Landscape significance

- The world-famous racecourses, gallops and studs at Newmarket are a distinctive land use within the Cambridgeshire and Suffolk Rolling Estate Chalklands. (Michelle Bolger Expert Landscape Consultancy, 2022)
- Newmarket is specifically identified for its horseracing heritage at a national level, signifying the importance of this land use to the landscape character and its value beyond the local level. (Michelle Bolger Expert Landscape Consultancy, 2022)
- Development guidance for the chalkland landscape character type explains that developments that could be accommodated in visual terms can still have a profound effect on landscape character due to the deeply rural nature of these landscapes. (Michelle Bolger Expert Landscape Consultancy, 2022)
- The value of the local landscape in which Sunnica West Site A is located, which includes the Limekilns, is high and should be considered as a valued landscape for the purposes of National Planning Policy Framework paragraph 174. (Michelle Bolger Expert Landscape Consultancy, 2022)
- This value is a result of the following factors:
 - Cultural heritage: the Limekilns have been identified as a non-designated heritage asset
 - Landscape condition: the condition of the Limekilns is intact
 - Associative:
 - there are strong historic and contemporary associations with the Limekilns as evidenced by a range of pictures and prints
 - Watching horses on the gallops is a much prized early morning activity for local people and visitors and has become part of the Newmarket experience
 - Recreational:
 - there is permissive access to the Limekilns through the winter and after midday in the summer
 - in an area that is not well served by public rights of way and where there are limited opportunities for extensive views from elevated locations this access is likely to be highly valued
 - Perceptual (scenic): the views from the Limekilns have considerable scenic qualities due to the elevation of the land (extensive views across a rural agricultural landscape with views of Ely cathedral or the horizon in good conditions)
 - Functional:
 - the Limekilns have a historic and contemporary function as gallops for the Newmarket's horseracing industry
 - the agricultural landscape to the north provides an essential rural setting for the gallops(Michelle Bolger Expert Landscape Consultancy, 2022)

8.9 A horseracing industry specific perspective on the current day landscape value of the Limekilns was provided by Simon Crisford in response to the questions put to him during the research for this report (Appendix 2). He explained as follows.

- *Given that racing opportunities are limited, watching a horse in training on the Limekilns is an excellent opportunity to see its form and feel the sense of anticipation and the excitement for an upcoming race.*
- *Further, it provides an opportunity to do this in calm and beautiful surroundings (it is a chance to enjoy the performance without the hype, noise, pressure and formality of race day).*
- *There is nothing quite like seeing a horse train in beautiful scenery, with beautiful turf underneath it.*
- *Training in urban areas, which occurs in other parts of the world, is claustrophobic comparatively, and is much less natural and less good for the horses (and is a very different experience for the people training and watching the horses too).*
- *The Limekilns has a real sense of place - an ambience and a unique and iconic identity; there is a reason that the first picture you see on the discovernewmarket.co.uk website is of the Limekilns.* (Sykes-Popham, Notes of interview with Simon Crisford, 2022)

Economic significance

- Newmarket offers a unique set of factors which attract investors in the industry, in particular the historical association with horseracing, including that of the gallops and their integration within the countryside and landscape in which they lie. (The Jockey Club, 2022)
- Arguably the most historical and highest quality of Newmarket's gallops is the Limekilns. (The Jockey Club, 2022)
- The Limekilns are the gallops where potential investors are brought to view horses in training. (The Jockey Club, 2022)
- The Limekilns is extremely popular for visiting owners and others to watch the training of racehorses and significantly contributes to the "Newmarket experience" - this experience is one which is famously unique to Newmarket. (Tattersalls Ltd, 2022)

Views of key industry figures

- The Limekilns are likely the best and most famous turf gallops in the world. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Their status is that of hallowed ground in the horseracing world (a bit like Lord's is to cricketers and cricket fans). (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Owners and trainers from other parts of the world are amazed when they come to Newmarket and see what can reasonably be described as the ideal environment for training racehorses. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- The facilities on offer in Newmarket, particularly the Limekilns, are the standard that others aim for. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- The length of time for which the Limekilns have existed and been expertly maintained, and therefore the quality of the ground, makes them impossible to copy. (Sykes-Popham, Notes of interview with Christian Wall, 2022)

- The ground has never been ploughed and peat moss has been applied over an extensive period meaning that it is very kind to horses. (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- The Limekilns are the ultimate place to train horses when preparing them for key races. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- They are used by the best horses in the world to train for the best races in the world. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- They very effectively replicate the conditions of some of Britain's most important racecourses, not least because they are flat, expansive and quiet. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- The quality of ground on the Limekilns Gallops is important from an injury prevention point of view, particularly given their use in the run up to key events. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Horses being prepared for the Epsom Derby and Royal Ascot are given their final exercise and gallop on the Limekilns for this reason. (Sykes-Popham, Notes of interview with William Jarvis, 2022)

THE RAILWAY FIELD

8.10 The Railway Field lies immediately northwest of the Limekilns (on the opposite side of the A1304). Due to its proximity to the Limekilns its significance and the reasons for it are partially shared with the Limekilns. Further, the name "The Limekilns" appears to be intended to include the Railway Field in certain contexts (where it is applied to the Limekilns, Railway Field and Water Hall collectively).

8.11 In addition to the points in the foregoing subsection (on the Limekilns) that relate to the Railway Field as well as the Limekilns, the Railway Field's significance is also a function of the following.

- The Jockey Club leased the Railway Field (together with The Limekilns and Water Hall) from the Chippenham Estate as exercise grounds from 1840. (David Oldrey & Timothy Cox)
- The Club eventually bought the Railway Field (together with the Limekilns and Water Hall) from the Tharp Family in 1932 as part of a deal worth £75,000. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The Railway Field lies on the eastern side of Newmarket to the north of the A1304. (David Oldery, Timothy Cox & Richard Nash, 2016)
- Its principal use nowadays is the Al Bahathri all-weather Polytrack, given to Newmarket by the Maktoum family and named after one of their classic winners. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The Polytrack stretches over nine gently rising furlongs and is suitable for faster work upsides on its artificial surface. (David Oldery, Timothy Cox & Richard Nash, 2016)
- The Polytrack gets used every day of the year; it gets lots of use in really firm conditions (in really dry weather) and in the middle of winter. (Thoroughbred Daily News/John Berry, n.d.)

GODOLPHIN'S CHIPPENHAM/SNAILWELL GALLOPS

8.12 Godolphin's Chippenham/Snailwell Gallops are a private racehorse training facility of racecourse quality and are the subject of significant ongoing investment. They have existed for 40 - 50 years but came into their own 20 - 30 years ago. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)

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- 8.13 The 300 acre facility provides a range of different options for trainers:
- all are up hill so as to offer an appropriate level of challenge for the horses in training; and
 - one of the gallops includes a bend, which allows most race scenarios to be replicated. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)

PUBLIC RIGHT OF WAY 204/5 (BRIDLEWAY RUNNING SE - NW BETWEEN CHIPPENHAM/SNAILWELL GALLOPS AND SUNNICA WEST SITE A)

- 8.14 Public right of way 204/5 runs along the initial section of the historic approach to Chippenham Park, starting at the A1304, before crossing the A14 and joining the section of path alongside Godolphin's Chippenham/Snailwell Gallops.
- 8.15 Views north from this bridleway are across fields and woodland within Sunnica West Site A and provide a connection to the wider rural landscape north of Newmarket. (Michelle Bolger Expert Landscape Consultancy, 2022)
- 8.16 Being a bridleway, and the fact that it runs past or close to a number of training grounds, means that public right of way 204/5 is used for rest and recovery activities for racehorses. (Sykes-Popham, Notes of interview with Christian Wall, 2022)

9 IMPACT OF PROPOSED SUNNICA ENERGY FARM DEVELOPMENT ON HORSERACING INDUSTRY ASSETS

- 9.1 This section identifies the impacts of the proposed Sunnica Energy Farm development on the horseracing industry assets identified in section 7 as being those most likely to be impacted significantly by the scheme.
- 9.2 There is concern amongst the horseracing industry that these impacts will be serious, not least because of the duration and the nature and extent of the construction phase impacts. (Sykes-Popham, Notes of interview with William Jarvis, 2022)

CHIPPENHAM ESTATE - VERY HIGH MAGNITUDE OF EFFECT ANTICIPATED

- 9.3 All of the racing industry assets identified by this report as being likely to be significantly affected by the proposed Sunnica Energy Farm development are closest to the Sunnica West Site A part of the application site. It is therefore the case that it is from Sunnica West Site A that the majority if not all of the of the impact is likely to come.
- 9.4 The impacts on the 8.8 acre hectare parcel of Chippenham Estate land that was formerly in stud use will be of the highest magnitude since three quarters of it forms part of Sunnica West Site A and half to a third of it is proposed to accommodate photovoltaic arrays. The impacts are likely to include:

Construction phase

- Change of use - resulting in the loss of the land from stud farm use during the construction phase of the relevant part of the development
- Landscape and visual - very high magnitude impacts by virtue of development being located on the land (and therefore the fact that construction works that will need to take place on the land)
- Noise - high magnitude of impact by virtue of low background noise levels and construction works taking place on the land
- Dust - impacts likely to be some of the highest the scheme generates by virtue of the low environmental baseline and the land accommodating one of the development's emission sources (construction sites)
- Busyness, movement and activity - high magnitude of impact due to low baseline activity and construction works taking place on the land

Operational phase

- Change of use - resulting in the permanent loss of the land from stud farm use (for at least the lifetime of the development)
- Landscape and visual - very high magnitude impacts by virtue of development being located on the land
- Noise - potential for impacts depending on levels of operational noise emissions
- Glint and glare - potential for impacts depending on design of photovoltaic products used, scheme layout and design, effectiveness of screening etc (consideration of this matter is not helped by the fact that the glint and glare assessment forming part of the Development Consent Order application is likely inadequate per paragraph 9.13 below)

THE LIMEKILNS - HIGH MAGNITUDE OF EFFECT ANTICIPATED

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- 9.5 Due to its separation from Sunnica West Site A (as opposed to the Chippenham Estate land, which is part of it), and the intervening infrastructure, the Limekilns Gallops are likely to be less significantly affected during the construction phase. Most of the impacts set out below are therefore most relevant to the operational phase of the proposed Sunnica development but some apply to both.

Busyness, movement and activity

- 9.6 There are likely to be impacts associated with busyness, movement and activity on Sunnica West Site A during the construction of the proposed development. These will be responsible in part for the visual effect detailed later in this section.
- 9.7 The extent to which Sunnica West Site A is visible from the Limekilns means that busyness, movement and activity on West Site A is likely to be readily apparent.
- 9.8 The rural and tranquil baseline environment means that even relatively minor increases in busyness, movement and activity which are visible from the Limekilns are likely to have an impact (as was the case, and may still be the case, with the railway related works taking place at the compound immediately northwest of the Railway Field (between the railway line, A14 and public right of way 204/5) which involved only two 360 excavators). Given the size of Sunnica West Site A it is likely that scale and intensity of construction works will be significant and therefore that there will be significant impact on the tranquil rural ambience of the Limekilns for the duration of the construction work.

Heritage impact

- 9.9 The heritage impact of the proposed Sunnica Energy Farm development has been assessed by Richard Hoggett Heritage on behalf of the Say No to Sunnica Action Group. The resultant Heritage Assessment (Richard Hoggett Heritage, 2022) finds as follows.
- Almost entirely absent from the cultural heritage assessment forming part of the Sunnica Development Consent Order application is an appreciation of the extent and historical significance of the racing landscape which surrounds Newmarket.
 - Of greatest significance to the cultural heritage impact of the proposed Sunnica Energy Farm in this regard is the close proximity of the southern boundary of Sunnica West Site A to the Limekilns Gallops.
 - The construction of Sunnica West Site A will have a detrimental impact on the setting of the gallops by transforming what is currently an open agricultural landscape to their north into the semi-industrialised landscape of the solar farm, and this will in turn harm their significance (as a non-designated heritage asset).
 - Using the assessment matrix employed in the applicant's cultural heritage assessment this will result in an adverse effect of medium magnitude, which on an asset of medium heritage value will result in a moderate adverse impact.
 - This is a significant impact, and is one that, by the applicant's own admission, cannot be mitigated by the landscape management strategy forming part of the application.

Landscape impact

- 9.10 The landscape impact of the proposed Sunnica Energy Farm development has been assessed by Michelle Bolger Expert Landscape Consultancy. The resultant "Landscape and Visual Issues relating to the Sunnica Energy Farm" report (Michelle Bolger Expert Landscape Consultancy, 2022) finds as follows.

- Sunnica West Site A is part of the agricultural landscape which is seen in views looking north from the Limekilns and provides an essential rural setting for the Limekilns.
- This setting has been included in many of the paintings and prints that depict both individual horses on the Limekilns and horse racing activities taking place on the Limekilns.
- The rural setting is considered to be an integral part of the overall experience of the Limekilns.
- The value of the local landscape in which the Limekilns are located is high and should be considered as a valued landscape for the purposes of National Planning Policy Framework paragraph 174.
- Sunnica West Site A is part of the landscape setting of Chippenham Park (a Registered Park and Garden) and the Limekilns Gallops.
- The development will be visible across the Limekilns which forms a major part of Local Landscape Character Area 26 (The Limekilns and Gallops), changing the much celebrated and prevailing rural character of their landscape setting.
- The existing rural setting will be replaced by a setting dominated and defined by industrial development.
- Due to the elevated nature of the Limekilns, structures within the development would be visible along the entire southern edge of the Gallops: from the north eastern end by Chippenham Road, to the south western end close to the B1506/A1304 junction.
- Within the Limekilns there would be a constant awareness that the wider rural setting to the Gallops had been replaced by an extensive solar PV development.
- At the most elevated parts of the Limekilns, the development would be visible across a wide field of view, such that an observer would have to turn their head in order to take it all in.
- The battery energy storage element of the development on Sunnica West Site A may be visible from more easterly parts of the Limekilns.
- Development within the western parts of the site will be particularly noticeable from within the Limekilns (Parcels W05, W07, and W03, W04).
- The photovoltaic modules in parcel W03 will be particularly prominent because W03 is located on the southeast facing slope of a localised ridge, directly facing the Limekilns.
- The susceptibility of the local landscape is considered to be high.
- Local topography, its effect on the visibility of the development from the Limekilns and the role of Sunnica West Site A in providing a rural setting to the Limekilns and Chippenham Park are key factors contributing to this high level of susceptibility.
- The local landscape in which the site is located has high value and the overall sensitivity of the local landscape to the change that would result from the development proposed is high.
- The magnitude of change would be medium/high and given the high sensitivity of the landscape the overall effect upon the character of the local landscape would be major adverse, which is significant.
- Due to the local topography, the development would not be screened by mitigation planting.
- The overall effect upon the character of the highly valued landscape of the Limekilns Gallops would be major adverse, which is significant, and this effect would not reduce in the long term.

Visual impact / impact on users of the Limekilns

9.11 As with the landscape impact of the proposed Sunnica Energy Farm development, the visual impact as assessed by Michelle Bolger Expert Landscape Consultancy is reported in the “Landscape and Visual Issues relating to the Sunnica Energy Farm” report. With respect to visual impact the report details as follows.

- Visitors to the Limekilns would be one of three key public receptor groups affected by development at Sunnica West Site A³ and would have high sensitivity.
- Receptors within the Limekilns would experience a high magnitude of change, both during the construction and operation of the development.
- The effect on people within the Limekilns would be a major adverse one.
- This harm would be due to the loss of valued open views of the countryside as well as the introduction of large-scale industrial development.
- In view of the elevated views across the site from the Limekilns it would not be possible to screen the development with mitigation planting.

GLINT AND GLARE

9.12 As with the Chippenham Estate land, there is the potential for glint and glare impacts from Sunnica West Site A on the Limekilns depending on the design of the photovoltaic products to be installed as part of the development and the scheme layout and design. It has been accepted that screening the development from the Limekilns would not be possible. Any glint and glare impacts on the Limekilns that would arise could not therefore be mitigated by screening.

9.13 It is not possible to say with any certainty what the impact of the proposed development by way of glint and glare will be without the benefit of a specialist assessment. In their Relevant Representations to the Examining Authority for the Sunnica Energy Farm Development Consent Order application the Say no to Sunnica Action Group have noted that the impact of glint and glare on horses in training, recreational horse riding, and other outdoor pursuits and land uses is inadequately assessed by the applicant.

Horseracing industry views

9.14 Given the Limekilns primary use as gallops, the horseracing industry is well placed to understand and comment on the majority of the impacts that are likely to arise. The industry’s views are captured in the below.

- The nature of the Newmarket landscape to its north-east would be substantially and detrimentally changed by the Sunnica proposals. (The Jockey Club, 2022)
- One enjoys a sense of rural beauty when standing on the Limekilns looking out to the north; this includes views of Ely cathedral on a clear day. (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- The development would not be an appropriate, natural, positive or even neutral change to the landscape setting of the Gallops (it risks changing the perception of the setting from rural to industrial). (Sykes-Popham, Notes of interview with Christian Wall, 2022)

³ The others being users of public right of way 204/5 and users of the road network

- The pleasant rural view providing an important countryside setting for the Limekilns gallops will be harmed - this would alter the ambience of the Limekilns. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- When on The Limekilns you would no longer feel like you were in the countryside, which would be a great loss. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Views from the Limekilns would appear industrialised, transformed from an agricultural and equine landscape and part of Newmarket's historical equestrian culture into a landscape with large areas of industrial solar development. (The Jockey Club, 2022)
- This would desecrate the rural setting in which the horseracing industry in Newmarket is used to training and racing horses. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Training horses in an urban environment is a very different proposition and experience to training in a rural environment. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- Urban training and racing does occur, e.g. Hong Kong, Belmont Park (New York) but it is a particular offer and experience. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- Newmarket offers the very best training and racing facilities in the world while still providing the traditional set up and rural surroundings - this is one the reasons owners and trainers choose Newmarket - they come to see training and racing in a bucolic environment. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- The Limekilns is where potential investors are brought to view horses in training. (The Jockey Club, 2022)
- The setting of the Limekilns is undoubtedly a draw to some owners/investors, who:
 - are often extremely wealthy people with a lot of choice; and
 - have decided that they want their horses to be trained in Newmarket because of what it is today. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- If what Newmarket offers is negatively impacted by development and important and memorable views are lost, there's a real possibility that owners/investors will decide that Newmarket is not what it used to be and will look elsewhere. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- The proposed Sunnica Energy Farm development would be a negative factor to many potential investors in racehorse training, making Newmarket less attractive to users and visitors. (Tattersalls Ltd, 2022) (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- The Limekilns are also used by the public as an area for recreation in the afternoons all the year round (when not in use as gallops) - they are highly valued. (The Jockey Club, 2022)

9.15 An insightful commentary on the effect that the impact of the Sunnica development on the Limekilns would have on racehorse owners was provided by William Jarvis in response to the questions put to him during the research for this report (Appendix 1). His commentary is summarised below:

- *If I'm training a horse for a big race and plan to gallop it on The Limekilns or Al-Bahathri [all weather gallop on The Railway Field] I notify the owner so that they have the opportunity to witness it first-hand (and, typically, they will travel to Newmarket specifically to do so).*

- *As a result, three quarters of the time I train on the Limekilns I'm accompanied by owners, prospective owners or racing managers (racing managers report to owners or prospective owners on how their horses are being trained and are performing).*
- *For most owners it's their dream to see their horse gallop really well in advance of a race (it's why owners invest £25 - 30k a year on average in their horses).*
- *The experience is the combination of the anticipation of the race, the horse's form and the backdrop/setting for the event (in this case the Limekilns, Al-Bahathri etc).*
- *If this combination suffers because the quality of the backdrop is reduced/the ambience changes, the overall experience will be harmed.*
- *Owners will certainly disapprove of what the Sunnica scheme would do to this iconic location/backdrop/setting and some may be put off Newmarket by it altogether.*

THE RAILWAY FIELD - HIGH/MEDIUM MAGNITUDE OF EFFECT ANTICIPATED

- 9.16 The impacts on the Railway Field are likely to be the same as those on the Limekilns in view of the use of these assets being the same, their adjacent locations, and the fact that, while The Railway Field is lower lying than the Limekilns, Sunnica West Site A is still visible from much of it. While the impacts are likely to be the same the magnitude of the impacts will likely be a bit lower in view of the reduced (but still significant) intervisibility with Sunnica West Site A.

GODOLPHIN'S CHIPPENHAM/SNAILWELL GALLOPS - HIGH/MEDIUM MAGNITUDE OF EFFECT ANTICIPATED

- 9.17 Sunnica West Site A's proximity to Godolphin's Chippenham/Snailwell Gallops complex suggests a very high magnitude of impact but this is likely to be reduced to some extent by the intervening tree belt. The tree belt provides a reasonable level of screening between the two for the majority of their shared boundary.
- 9.18 The development's impacts on Godolphin's Chippenham/Snailwell Gallops complex are likely to include:

Construction phase

- Landscape and visual - see below
 - Noise - high magnitude of impact by virtue of low background noise levels and construction works taking place on adjacent land with no effective intervening noise reducing features (it is understood that the tree belt may provide a degree of noise attenuation, which could vary according to environmental circumstances)
 - Dust - impacts likely to be significant as a result of the low environmental baseline and one of the development's emission sources (construction sites) lying adjacent
 - Busyness, movement and activity - medium magnitude of impact due to low baseline activity and construction works taking place on adjacent land, but tempered by intervening screening
- 9.19 The noise impact of the construction phase of the development is of particular concern to the horseracing industry. Several prominent industry bodies and individuals have noted the impact, level of impact and risks associated. This is evidenced below.

- The construction noise, vehicle movements and operational running of the solar farm will be harmful to the peace and tranquillity of the local area. (Tattersalls Ltd, 2022)
- A number of stud farms and training establishments border the Sunnica site and therefore will be directly impacted. (Tattersalls Ltd, 2022)
- Construction noise from the Sunnica scheme could upset highly strung thoroughbreds. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- The risk to health and safety of such issues on highly sensitive bloodstock is significant. (Tattersalls Ltd, 2022)
- Often construction noise and disruption is dismissed as being an inevitable consequence of any major infrastructure project, but in the case of the breeding and training of horses especially thoroughbred racehorses, due to the vulnerable nature of horses, it can cause significantly greater harm than to a normal user of land including an ordinary agricultural unit. (The Jockey Club, 2022)

Operational phase

- Noise - potential for impacts depending on levels of operational noise emissions
- Glint and glare - potential for impacts depending on design of the photovoltaic products used, scheme layout and design, effectiveness of screening etc (consideration of this matter is not helped by the fact that the glint and glare assessment forming part of the Development Consent Order application is likely inadequate per paragraph 9.13 above)

9.20 The potential for the proposed development to generate noise during its operational phase is also of concern to the horseracing industry. If the equipment installed creates noise (e.g. humming and buzzing) this could upset horses training on the Godolphin Chippenham/Snailwell Gallops complex (especially if they can't see it and don't know where it's coming from). (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)

Landscape and visual impact (construction and operational phases)

9.21 As with the landscape and visual impacts of the proposed development on the Limekilns, the impacts on Godolphin's Chippenham/Snailwell Gallops complex as assessed by Michelle Bolger Expert Landscape Consultancy are reported in the "Landscape and Visual Issues relating to the Sunnica Energy Farm" report. The report details as follows.

- The relationship between the horse racing industry and its rural setting would be diminished around the Godolphin Gallops where views across open fields from public right of way 204/5 would be lost, initially to be replaced by temporary fencing and later by filtered views of solar photovoltaic modules.
- The immediate setting of the Godolphin Gallops (Local Landscape Character Area 24) would be harmed.
- The Gallops are experienced by people walking alongside them on public right of way 204/5, which is sandwiched between the Gallops and agricultural fields.
- These fields, specifically Parcels W03 and W04 would be replaced with photovoltaic modules.
- Although temporary fencing is proposed along W04 until the mitigation planting has established, this fencing would result in the same outcome delivered by the installation of the photovoltaic modules; by blocking views across the countryside, the visible connection to the wider countryside would be lost.

- The relationship between the horse racing industry and its rural setting would be diminished.
- The bridleway would no longer have a rural setting but an industrial one.

PUBLIC RIGHT OF WAY 204/5 - BRIDLEWAY RUNNING SE - NW BETWEEN CHIPPENHAM/SNAILWELL GALLOPS AND SUNNICA WEST SITE A - MEDIUM/HIGH MAGNITUDE OF EFFECT ANTICIPATED

9.22 The development's impacts on public right of way 204/5 are likely to be very similar to those on Godolphin's Chippenham/Snailwell Gallops complex include. They are:

Construction phase

- Landscape and visual - see below
- Noise - high magnitude of impact by virtue of low background noise levels and construction works taking place on adjacent land with no effective intervening noise reducing features (it is understood that the tree belt may provide a degree of noise attenuation, which could vary according to environmental circumstances)
- Dust - impacts likely to be significant as a result of the low environmental baseline and one of the development's emission sources (construction sites) lying adjacent
- Busyness, movement and activity - high magnitude of impact due to low baseline activity and construction works taking place on adjacent land, but tempered in places by intervening screening

Operational phase

- Noise - potential for impacts depending on levels of operational noise emissions
- Glint and glare - potential for impacts depending on design of the photovoltaic products used, scheme layout and design, effectiveness of screening etc

Landscape and visual impact (construction and operational phases)

9.23 The impacts on public right of way 204/5 as assessed by Michelle Bolger Expert Landscape Consultancy are reported in the "Landscape and Visual Issues relating to the Sunnica Energy Farm" report. The report details as follows.

- Users of public right of way 204/5 would be one of the three key public receptor groups affected by development at Sunnica West Site A and would have high sensitivity.
- Receptors along public right of way 204/5 would experience a medium/high magnitude of change, both during construction and the operation of the development.
- The effect on users of public right of way 204/5 would be moderate/major adverse one.
- The mitigation measures proposed include planting along the edge of parcels W03 and W04, which run parallel to public right of way 204/5 (temporary fencing is proposed alongside W04 until planting has matured).
- In time, it is expected that this planting will filter views of the development but there is likely to be sufficient visibility during winter months for the presence of the solar photovoltaic development to be noticeable.

10 IMPACT OF THE PROPOSED SUNNICA ENERGY FARM DEVELOPMENT ON THE HORSERACING INDUSTRY IN NEWMARKET AS A WHOLE

10.1 The previous section deals with the impact of the proposed Sunnica Energy Farm development on the horseracing industry assets it is most likely to affect. This section considers how those impacts are likely to translate to impacts on Newmarket's horseracing industry as a whole.

THE FUNDAMENTAL ISSUE

10.2 The fundamental issue regarding the proposed Sunnica Energy Farm development for Newmarket's horseracing industry is the impact that the development would have on the industry's ability to attract investment, i.e. to attract prospective racehorse owners and existing racehorse owners to buy Newmarket bloodstock, to buy bloodstock through Newmarket and, importantly, to have their horses trained in Newmarket. (Sykes-Popham, Notes of interview with William Jarvis, 2022)

10.3 The cost of purchasing the quality of horses currently trained at Newmarket can be anything from £30k to millions of pounds per animal. The highest price paid at Newmarket sales in 2018 for a yearling colt was £3.4m (Tattersalls, 2018). The average annual cost of having a horse trained in Newmarket is £25k - £30k (William Jarvis).

10.4 This issue is explained and evidenced below.

- Breeding, training and racing horses in Newmarket is a rural activity - Newmarket is an attractive place to raise and train racehorses. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- This is also the perception of Newmarket within the horseracing world (that Newmarket is rural and is surrounded by countryside). (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- If permitted, the Sunnica development would urbanise Newmarket. (Tattersalls Ltd, 2022)
- Newmarket is becoming increasingly urbanised and congested. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Racehorse owners, many being international investors, are the primary driver of economic activity in Newmarket through their purchase of horses and training and racing expenditure (Deloitte, September 2015)
- There is an increasing risk (as a result of proposals like the Sunnica Energy Farm development that would urbanise Newmarket) that investors will decide that Newmarket is no longer an attractive place to keep, breed and train their horses, which are often worth into the millions of pounds. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Further, the proposals to develop what would be the UK's largest solar farm adjacent to Newmarket training grounds and stud farms would have an enormously detrimental effect on the support of Newmarket from the wider International horseracing and breeding community. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)

COMPETITION AND LOSS OF INVESTMENT

10.5 This matter is also addressed, in part, at paragraphs 5.3 - 5.7 & 5.13 above.

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- 10.6 The crux of the matter is that, as far as investment in sport and leisure related activities are concerned, Newmarket's horseracing industry has anything but a captive audience. There are various other horseracing centres worldwide to choose from (with each having their particular strengths and points of interest) and many other sports and leisure pursuits outside horseracing to choose from. While Newmarket currently sits at the top of the horseracing world therefore, its position is never safe and, further, what may look like a large fish in a small pond is in fact a small fish in the very large pond of international sport and leisure investment.
- 10.7 The need for investment in Newmarket's horseracing industry is constant. Breeders can only exist if investors buy the horses they rear and trainers can only exist if investors bring them their horses to train. The industry therefore always has its work cut out to retain its existing investors and, not least because of an inevitable churn and the need to grow if it is possible to do so, to attract new investors.
- 10.8 While the focus as far as investment is concerned is often on high net worth individuals, the industry relies upon investment at all levels. While a lot is made of the high standards and demands of high net worth individuals, any individual or group investing significant sums annually is likely to seek high standards and quality both in the service they are securing and the environment in which it is delivered.
- 10.9 The competition and loss of investment issue is explained further and evidenced below.
- The horseracing industry depends upon continued investment in racehorses and racehorse training and breeding, including, in particular, from high net worth individuals who are footloose and can invest practically anywhere in the world. (The Jockey Club, 2022)
 - These investors are not readily identifiable by the very nature of footloose investment. (The Jockey Club, 2022)
 - The choice they have is wide, it is one not only of the different places in the world where they can invest, but is also one involving the many different sports and leisure pursuits available to them. (The Jockey Club, 2022)
 - Horseracing centres worldwide, including Newmarket, therefore compete not only with each other for this investment but also with other opportunities for leisure and sport investment globally. (The Jockey Club, 2022)
 - Investors notice and seek quality beyond their direct horseracing interests, including heritage, landscape setting, culture and recreation, both in and around the areas in which they invest. (Tattersalls Ltd, 2022)
 - They are typically wealthy people - they have a lot of choice and are picky - they want the best for themselves and their animals so are sensitive to change; even small changes, changes in softer or more subjective factors (like beauty and attractiveness) or even the perception of change. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
 - Investors won't invest in Newmarket just because it's Newmarket. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
 - If permitted the Sunnica development would urbanise Newmarket and undoubtedly give rise to the risk of an adverse perception about the racing and bloodstock industry's position. (Tattersalls Ltd, 2022)
 - Changing the look and feel of a significant part of Newmarket's surroundings (from entirely rural to something more akin to industrial) could put owners and investors off, it is not what they expect (and is certainly not why they choose Newmarket). (Sykes-Popham, Notes of interview with Christian Wall, 2022)

- It is entirely possible that owners might not want their horses trained in Newmarket if the environment and ambience of the principal areas where their horses are trained is significantly altered from what it is today. (Sykes-Popham, Notes of interview with Christian Wall, 2022)
- The industry could suffer significant detriment if this were to be the case and investment were not to continue. (Tattersalls Ltd, 2022)
- New investment by owners (in the breeding and racing of horses) is unlikely to be secured in the areas that are directly affected by the Sunnica development and existing investment might be pulled out or may simply dwindle. (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- It only takes one major investor to choose not to invest in Newmarket for substantial harm to be caused. (The Jockey Club, 2022)

10.10 A further point worth noting about high net worth investors in the horseracing industry is that they have the ability and resources to move their horses anywhere in the world at almost any point in time with relative ease. There is little or no inertia in relation their decision making about where to have their horses trained. This adds to the vulnerability of any entity relying on their investment (which might be an individual stud farm or training establishment) and only strengthens the need for such entities to be the best and to go the extra mile (and indeed to avoid doing anything to harm what the entity offers or is perceived to offer) to attract and retain the investment of such investors.

10.11 A considered and detailed analysis of the impact on investment issue was provided by Christian Wall in response to the questions put to him during the research for this report (Appendix 2). His analysis is summarised below.

- *If owners and prospective owners (of horses being bred and trained in Newmarket) are put off Newmarket by development like the Sunnica proposals they will move their horses elsewhere*
- *For some owners, horses are a hobby or a distraction, for others they are a significant financial investment - in either case a negative change in the setting and ambience of key industry assets in Newmarket (including one of the most significant - the Limekilns) could easily cause owners with interests in Newmarket to look elsewhere or deter prospective owners:*
 - *In the case of enthusiasts - the 'experience'/experiences associated with their investment is/are one of the key reasons for investing:*
 - *a standout experience for every owner is seeing their horse(s) in training in the run up to big races;*
 - *The Limekilns (and some of the other industry assets identified) are a crucial asset for this purpose;*
 - *the experience of witnessing their horse finding its form in the lead up to a big race, in one of most beautiful and iconic settings in the racing world, would undoubtedly be negatively affected by a significant discordant change in that setting - one that reduces its beauty and erodes the present day representation of the historic relationship (which Newmarket itself established) between horseracing and the open countryside;*
 - *because their 'experience'/experiences will be negatively impacted by proposals like Sunnica this aspect of their 'return' on their investment will be reduced;*
 - *they are therefore less likely to maintain that investment (in Newmarket at least).*

- *For owners for whom horses are a deliberate distraction from the other aspects of their lives - the more positive the distraction the better:*
 - *While they are less likely to be concerned with the quality of their experience per se they will not want their 'distraction' to develop negative connotations and associations that make it less pleasant (else some of the benefit of the distraction would be lost);*
 - *In this sense they are likely to want things to be relatively harmonious and the status quo (which they accept and are happy with) to continue.*
- *In the case of 'serious' investors - because they may have concerns about Newmarket's will and ability to protect and preserve its horseracing industry assets and interests, and therefore the long term prospects for breeding and training in Newmarket:*
 - *even just an element of doubt when dealing with horses worth millions of pounds could easily be sufficient for such investors to move their horses elsewhere;*
 - *not least because investors are constantly seeking the best of the best - pursuit of perfection is not uncommon;*
 - *they regularly re-assess their options (many employ people to do exactly this for them) and have no qualms about changing their plans and approach, especially as cost is often not a consideration).*
- *It is a constant challenge (and the result of a concerted and coordinated effort by numerous individuals, businesses and organisations) to attract owners to Newmarket and to retain them but the industry can't overcome issues beyond its control (e.g. development like Sunnica).*
- *It's all very well Newmarket's Horseracing Industry asserting that Newmarket is the best place in the world for breeding, training and racing horses but all stakeholders have to constantly demonstrate this in their actions and decisions if they want to maintain the position.*
- *If they don't do this Newmarket will lose its position.*

REPUTATIONAL IMPACT ON NEWMARKET'S HORSERACING INDUSTRY

10.12 One of the issues referred to above is the message that would be sent to the global horseracing industry, and potential investors more generally, if the proposed Sunnica Energy Farm were to be granted consent, is that Newmarket's horseracing industry doesn't care about the bigger picture, that it is not interested in taking care of itself and its surroundings. This issue was also dealt with by Christian Wall in response to the questions put to him during the research for this report (Appendix 1). He explained as follows:

- If developments like Sunnica are allowed to take place the message that will be sent to the horseracing world is that the authorities responsible for Newmarket (and to an extent the town itself, the surrounding villages, the local communities and the horseracing industry) don't take its role and significance within the horse racing industry seriously and are not concerned about protecting it.
- This would be a completely false and very unfair representation of most if not all of these groups, some of whom spend a considerable amount of time and effort protecting Newmarket's horseracing interests, and for good reason.
- If those investing large sums in Newmarket are not confident that the authorities and others with a stake in protecting and promoting Newmarket's racing industry

are willing and able to do so they may well look elsewhere (to other places that offer them greater comfort and reassurance that all of the things their investment needs will be prioritised, protected and maintained, and that they will get the best that is on offer).

OTHER EFFECTS

10.12.1 Effects beyond the horseracing industry are outside the scope of this report. However, knock-on effects would clearly result if the horseracing industry were to be negatively impacted by the proposed Sunnica development. The following extracts from two of the sources reviewed as part of the research for this report help illustrate this.

- *“Various ‘events’ attract many visitors to Newmarket. The two racecourses support more turf race meetings than anywhere else in the UK and Tattersalls’ sales also bring both people and horses to the area, both of which require accommodation and refreshment and, for horses, specialised transport as well. The tourism element is further enhanced by opportunities to visit the National Horseracing Museum, the National Stud and, at certain times, other specialised establishments. Visitor spending provides extra income for, inter alia, hotels and shops.”* (SQW, May 2017)
- *“It is imperative that all is done to avoid causing potential harm to the major benefits that the horseracing industry brings to the area, by avoiding and not imposing upon it harmful challenges and changes outside its control.”* (The Jockey Club, 2022)

PERCEPTION OF ADVERSE EFFECTS

10.13 A further crucial point about the impact of development like the proposed Sunnica Energy Farm on investment in Newmarket’s horseracing industry is that the potential impacts that would lead to the loss of investment don’t necessarily need to occur at all. The perception that they will occur or have occurred is likely to be sufficient. This is evidenced below.

- The reality is that an adverse perception is, in itself, harmful and contrary to the long-term viability of the racing and bloodstock industry in Newmarket. (Tattersalls Ltd, 2022)
- Not understanding the negative impacts of the development, as most don’t, won’t prevent owners/investors looking elsewhere, it is the mere perception of a negative impact that is enough. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- If investors perceive that Newmarket will be negatively impacted to the extent that alternative locations might provide a better offer they will look elsewhere. (Sykes-Popham, Notes of interview with Simon Crisford, 2022) (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Even a small chance of negative effects is a massive problem for the town. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- Investors are typically wealthy people - they have a lot of choice and are picky - they want the best for themselves and their animals so are sensitive to change; even small changes, changes in softer or more subjective factors (like beauty and attractiveness) or even the perception of change. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
- Because of their wealth and the ease with which horses can be moved owners will simply choose another location for their horse(s) to be trained if they merely perceive any of the following:

- Newmarket is taking a turn for the worse; (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- they don't like the message that approval of the Sunnica application would send; and/or (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- There is a risk to their horses. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- If permitted the Sunnica development would urbanise Newmarket and undoubtedly give rise to a risk of an adverse perception about the racing and bloodstock industry's position. (Tattersalls Ltd, 2022)

CONTAGION OF VIEWS

- 10.14 The scope for contagion of views among Newmarket's horseracing community is a potential compounding factor that needs to be considered when determining the impact of development proposals on investment in the industry within Newmarket. In essence it is about copy-cat behaviour and herd mentality.
- 10.15 If an influential figure or a critical mass take a particular decision, others are likely to follow. Thus, through what may initially be a minor impact, a major impact could result. Coupled with the fact that only a perception of harm may be necessary to start the process, it can be seen that contagion of views within the horseracing community has the potential to leave Newmarket's horseracing industry damaged as a result only a very minor impact or level of harm.
- 10.16 The contagion of views issue is explained and evidenced by the below.
- There is a degree of groupthink among owners/investors - negative views are contagious. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
 - The irony about the horseracing industry in Newmarket is that competitors often work together synergistically. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
 - The moment one major owner, breeder or trainer pulls out there is a risk that others follow suit and all start to feel that Newmarket isn't what is used to be. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
 - If the town were to lose even a quarter of its owners, breeders and/or trainers the industry in Newmarket would be irreparably damaged. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)
 - Newmarket is home to hundreds of millions of pounds worth of bloodstock - loss of even a relatively small proportion of this 'resource' to other breeding and training centres would likely harm Newmarket's significance and position in the horse racing world, and would be hard to reverse. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)

HOW MIGHT THE IMPACTS MANIFEST?

- 10.17 The following insights gathered during the research for this report provide an indication of how the loss of investment might occur and the form it might take.
- Discussions with owners have indicated that the prospect of having their horses being trained or bred so close to such a massive development, will, in effect, ruin the exclusivity of keeping horses in and around Newmarket and give them no option but to consider other racing and breeding centres. (Sykes-Popham, Notes of interview with Simon Crisford, 2022)

- *“If our clients relocate the potential for us to close our business or relocate would become a distinct possibility.”* (Sykes-Popham, Notes of interview with Simon Crisford, 2022)
- New investment by owners (in the breeding and racing of horses) is unlikely to be secured in the areas that are directly affected by the development and existing investment might be pulled out or may simply dwindle (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- Those close to the scheme, e.g. Ibrahim Araci (who bought Old Mill Stud, Chippenham only a few years ago), are likely to be most significantly affected (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- Brookside Stud, Chippenham is another example. (Sykes-Popham, Notes of interview with William Jarvis, 2022)
- In the case of Godolphin the decision about whether to stay in Newmarket would depend on a number of factors; the convergence of a number of adverse factors, of which the approval of the Sunnica scheme could be one, could result in a decision to leave Newmarket. (Sykes-Popham, Notes of interview with Hugh Anderson, 2022)

10.18 The case of Godolphin is proof of what happens when investment drops and there are fewer horses to train. In 2014 Godolphin closed one of its smaller yards. It’s Managing Director (Hugh Anderson - one of the industry figures interviewed for this report) said in a statement at the time:

“Godolphin today moved the horses out of one of our smaller yards in Newmarket, Highfields. Those horses have been distributed around other Godolphin or Darley training yards in the town and, as a result, a number of staff have also been redeployed within the company here or in Dubai. With fewer horses to train, there has unfortunately been a need to let a relatively small number of yard staff go.”
(Wood, 2014)

10.19 It should be noted that the decisions of a very few owners, like Godolphin, because of their size and significance, could have major repercussions for Newmarket. Godolphin are understood to have over 300 horses in training in Newmarket and employ several hundred staff. If they were downsize significantly or leave Newmarket altogether the confidence of others in Newmarket would likely take a serious knock. Given their position as Newmarket’s leading owner, and the influence which inevitably comes with it, one obvious possible impact could be a reduction in or withdrawal of investment by others.

11 SUMMARY AND CONCLUSIONS

- 11.1 Brief summaries of the key sections of this report are set out below together with the conclusions reached.

Significance and importance of horseracing and British horseracing in particular

- 11.2 As a major international sport, horseracing has considerable significance in today's world. However, its significance extends far beyond its sporting significance. It holds major historical and cultural significance and is a major economic player in the sporting world.
- 11.3 Given Britain's high and arguably pre-eminent standing in the horseracing world this significance applies equally, and in some cases especially, to British horseracing. In addition, the international nature of the sport and Britain's position within it means that British horseracing holds political significance for the influence and soft power it affords Britain in certain spheres on the international stage.

Significance and importance of Newmarket within the horseracing world and within the British horseracing industry in particular

- 11.4 Newmarket holds a pre-eminent position within the horseracing world. This is partly because of the crucial role it played in the development of the sport. Whilst its fortunes have waxed and waned over the centuries its pivotal early role has enabled it to bounce back several times, though it has never surpassed the lofty position it held in eighteenth century before horseracing exploded onto the world stage.
- 11.5 There is no location in the world comparable to Newmarket in terms of scale, diversity and concentration of horseracing operations. It offers some of the best breeding, training and racing of thoroughbred racehorses in the world. Further, it is home to the Jockey Club and one of the finest collections of sporting art in the world, which adds cultural depth and significance to the sport's activities in the town.
- 11.6 Economically Newmarket plays a significant role at all levels. It is a major attractor of overseas investment, it is a sizeable part of the British horseracing industry and, being responsible for 8,500 jobs and £200m worth of economic activity annually, it is an irreplaceable part of the regional economy.

Vulnerability of Newmarket's position in the horseracing world

- 11.7 Despite the apparent strength of Newmarket's horseracing industry its position is far from secure. There seems to be limited awareness and understanding of the industry and its value to the town among those outside the industry. Development in and around the town has the potential to harm the industry by virtue of making the town less horseracing friendly or less attractive to those with an interest in the sport; there are examples of development causing such harm in other horseracing centres or clusters. Finally, the nature of international sport and the type of investment it attracts means that Newmarket is having to compete with an ever larger number of locations and sports for the investment it relies upon to survive.
- 11.8 Coupled with the foregoing there are a number of feasible alternatives to Newmarket, most with their own particular strengths, both in the UK and abroad. If Newmarket is sufficiently threatened or harmed, including by inappropriate and harmful development, there is a significant risk that it would become less conducive to the operational needs of the

horseracing industry and much harder for the industry to attract and retain, year after year, the investment on which its survival and success depends.

- 11.9 All those with an influence over the future of the town must therefore work together to maintain an environment which is conducive to the success of the industry if it is to maintain its value and significance within the horseracing world and to the national and regional economy.

Physical representation of the horseracing industry in Newmarket

- 11.10 The horseracing industry is represented in and around Newmarket by numerous physical assets, the most readily apparent of which are the training grounds, horse walks, racecourses, the Jockey Club Rooms and Tattersalls. Other equally significant assets such as the training yards and supporting services are less obvious. Public rights of way used by the industry are also among this group of less obvious assets.
- 11.11 The stud farms, while often readily apparent, tend to be located on the edge of Newmarket or further out.

Relationship between proposed Sunnica Energy Farm development and horseracing industry assets

- 11.12 A number of horseracing industry assets are proximal to the site of the proposed Sunnica Energy Farm development. Those closest to the site, and therefore most likely to be affected significantly by it are (in order of the likely magnitude of impact anticipated):
- Chippenham Estate - very high magnitude of effect anticipated;
 - The Limekilns - high magnitude of effect anticipated;
 - Water Hall - high magnitude of effect anticipated;
 - Public right of way 204/5 (bridleway running SE - NW between Chippenham/Snailwell Gallops and Sunnica West Site A) - medium/high magnitude of effect anticipated;
 - Godolphin's Chippenham/Snailwell Gallops - medium/high magnitude of effect anticipated;
 - Arran House Stud - medium/high magnitude of effect anticipated;
 - St Simon Stud - medium magnitude of effect anticipated; and
 - The Railway Field - low/medium high magnitude of effect anticipated.

Significance of horseracing industry assets likely to impacted

- 11.13 The significance of the horseracing industry assets likely to be impacted by the proposed Sunnica Energy Farm development vary, with the most significant among them being the Limekilns (and associated with them, but to a lesser extent, the Railway Field). The Limekilns are of considerable significance both within and outside the horseracing industry in view of the continuity of their horseracing related use and service to the industry; the time and resources that have been put into securing, improving and protecting them; their cultural and heritage significance; their landscape value; their association with some of the finest horses in the world at the peak of their form (and in some cases the peak of their careers); and, as a result of all of the above, their ability to woo and grip prospective and existing enthusiasts and investors in the sport.
- 11.14 Other assets such as Godolphin's Chippenham/Snailwell Gallops complex represent significant investment in the sport, developed to provide high quality race preparation for the horses of

one of the biggest investors in the sport. The nearby public right of way 204/5 provides a public and more informal resource that can be used by the industry for rest and recovery activities for racehorses.

- 11.15 All of these assets are of significance to the horseracing industry, some of particular significance, in making Newmarket the unique and highly successful horseracing cluster it is today.

Impact of proposed Sunnica Energy Farm development on horseracing industry assets

- 11.16 The impacts of the proposed Sunnica Energy Farm development on all five of the main assets identified in this report is likely to be significant. Impacts would occur during both the construction and operational phases and, for some or all of the assets, are likely to include change of use, noise, glint and glare, landscape and visual effects and busyness, movement and activity related effects. The value and significance of all of these assets would be harmed by the proposed development and, as a result, the contribution they make and the role they play in Newmarket's horseracing industry would be diminished.
- 11.17 The impacts will be particularly pronounced on the Chippenham Estate land and The Limekilns. The Chippenham Estate land appears to have been taken out of stud use (and equine use altogether for that matter) so, despite the direct impacts on it that would occur, and the fact that it could be returned to stud use, it is not of particular relevance to this report as things stand.
- 11.18 The impact on the Limekilns would be of a high magnitude. Their considerable significance and the effect that the proposed development would have on their tranquillity, landscape setting, heritage value and longstanding use would cause permanent harm to their significance, value and function.

Impact of the proposed Sunnica Energy Farm development on the horseracing industry in Newmarket as a whole

- 11.19 The significant impacts of the proposed Sunnica Energy Farm development on the horseracing industry assets identified would result in significant impacts on Newmarket's horseracing industry as whole. The most significant of these impacts would be likely to be the impact on the industry's ability to attract and retain the investment on which it relies in order to survive and to maintain its dominance. The existence of a high quality environment conducive to the training of racehorses and fitting for the traditional, rural world view of Newmarket that exists within the horseracing industry is central to its continued existence. The proposed development would harm this environment and image and, in so doing, directly impact the 'investability' of Newmarket horseracing industry.
- 11.20 This key impact has the potential to be amplified by the reputational damage that the development may inflict, the fact that perception of impacts alone would be sufficient to cause significant harm to the industry (through its effect on investment), and the contagion of views within the industry.
- 11.21 The manifestation of this harm could be a general or gradual diminution, decline or shrinking of the industry as a result of reduced investment but there is also the possibility, as has been alluded to by key industry figures, that loss of investment could occur on a relatively large scale and with relative ease if, for example, a major operation like Godolphin were to relocate to what may then be deemed a more favourable alternative horseracing centre or cluster.

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APPENDIX 1 - NEWMARKET HORSEMEN'S GROUP - LIST OF MEMBERS

- Newmarket Trainers Federation
- Newmarket Stud Farmers Association
- Jockey Club Estates
- Godolphin
- Tattersalls
- BBA Transport and Shipping (representing ancillary businesses)

APPENDIX 2 - NOTES FROM INTERVIEWS WITH PROMINENT NEWMARKET HORSERACING INDUSTRY FIGURES

CHRISTIAN WALL

Experiiece

- **Time in horse racing industry:** since 1979 (Newmarket based ever since)
- **Roles/positions held (past):**
 - Assistant Trainer (1979 - 1987)
 - Trainer (1987 - present)
- **Roles/positions held (current):** Managing Director, Easaway Ltd
[REDACTED] and Trainer (training race horses for clients from around the world)
- **Other roles/positions held:**
 - Chairman of the Heath Committee (Jockey Club committee of trainers that liaises with the Jockey Club about the maintenance and upkeep of the training grounds)
 - President of National Trainers Federation (2006 - 2007)
- **Notable successes:**
 - Candy Glen ([REDACTED])
 - Donna Viola ([REDACTED])
 - Missed flight ([REDACTED])
 - Double or Bubble ([REDACTED])

Responses to questions

1. What is Newmarket's position in the horseracing world?

- It is perceived to be the headquarters of racing globally
- Organised thoroughbred racing originated in Newmarket (under Charles II) and the town has subsequently, and unsurprisingly, developed into a major centre for horseracing
- It is world renowned and is the best known place in the world for horseracing
- It has a reputation for excellence (built up over time across lots of equine related specialisms)
- Some of the best horses are both bred and/or trained in Newmarket
- It is a magnet for owners, trainers, breeders and racegoers
- It holds the number one spot for in Europe for numbers of horses trained and bred (this activity is concentrated in a small area)
- Two of the five British Classics⁴ are run at Newmarket (2,000 Guineas Stakes and 1,000 Guineas Stakes)

2. Why does it hold this position?

- Its 2,500 acres of heathland gallops and 20 miles of all weather surfaces (all available for training horses)
- Its geology (chalk based soil) - this is particularly important for breeding - good for development of young stock (creates strong bones)
- It is home to Tattersalls (world renowned for bloodstock sales) - attracts buyers from all over the world to Newmarket

⁴ Five long-standing Group 1 horse races run during the traditional flat racing season.

-
- Its unique assembly of horseracing assets (services, facilities and businesses) and interests in the town covering all aspects of the racing industry
3. To what extent is Newmarket's position in horse racing world secure?
- Its position has to be constantly worked on and protected
 - The Jockey Club works hard to do this - principal objectives of Jockey Club Estates (2015): *"the continued investment in and development of its training grounds as centres of excellence for the training of thoroughbred horses and the continuing popularity and importance of Newmarket to the Horseracing industry worldwide"*
 - The industry has and continues to work very hard to protect its interests and activities
 - Stakeholders must ensure collectively that Newmarket's horse racing industry remains healthy
 - This requires a safe and secure environment in which horses can be bred and trained
 - Foreign investors need to feel that their horses are getting the very best in Newmarket (and therefore that their racing interests aren't being compromised in any way)
4. Who/what are the challengers/challenges / potential challengers/challenges?
- Abroad:
 - Expanding racing interests in the Middle East (where significant investment is occurring)
 - In the UK:
 - Lambourn, Berkshire
 - Malton, Yorkshire
 - Middleham, Yorkshire
5. Why are the challengers/challenges identified above challenging Newmarket?
- Middle East:
 - Because of the amount of money being invested there
 - The Middle East will never have a breeding industry because conditions aren't right there
 - However, the Middle East loves racing and is prepared to spend a lot of money on it
 - Horses can be and are trained in the Middle East but a lot are still trained in Newmarket, even if they race in the Middle East
 - If Newmarket loses its position and/or appeal, training of these horses may increasingly move to the Middle East, which would result in a significant loss of investment in Newmarket
 - This illustrates a wider point; that the horseracing industry is global, and therefore that to remain competitive Newmarket needs to continue to attract and retain investment (which also means that it doesn't go elsewhere)
 - Lambourn, Malton & Middleham
 - Because they are Britain's other main racehorse breeding and training centres with which Newmarket naturally competes (but currently leads by virtue of its size and offer)
6. What is the significance of the Limekilns as a horse racing industry asset in their own right?

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- The Limekilns are among the best gallops to be found anywhere in the world because of:
 - Their topography - this provides a gentle rise, which is a challenge for horses when galloping them to get them fit (it is good for working them hard but is not too severe)
 - Their natural heathland grass that has never be cultivated
 - Several attempts have been made to copy the Limekilns elsewhere in the world, including in Japan where parts of the Limekilns and Warren Hill have been copied
7. What is the significance of the Limekilns as a horseracing industry asset relative to similar racing industry assets?
- There are plenty of other places where top class horses have been and are trained but Newmarket naturally lends itself to training
 - The length of time that Newmarket's gallops have been in existence and expertly maintained (and therefore the quality of their ground/turf) makes them impossible to copy
 - The facilities on offer in Newmarket, particularly the Limekilns, are the standard that others aim for
 - Owners and trainers from other parts of the world, particularly those where training takes place on racetracks, are amazed when they come to Newmarket and see what can reasonably be described as the ideal environment for training race horses
8. Are there any other horseracing industry assets that may be affected by proposals like Sunnica?
- Yes:
 1. Al Bahathri all weather gallop on the Railway Field (adjacent to the railway line and the closest 'asset' to the Sunnica proposals)
 2. Long Hill (training area)
 3. Godolphin Chippenham/Snailwell Gallops complex
 4. Bridleway running adjacent to Sunnica West Site A
9. What do you consider the impact of the proposed Sunnica scheme on the Limekilns would be?
- The pleasant rural view providing an important countryside setting for the gallops will be harmed
 - The Sunnica scheme would not be an appropriate, natural, positive or even neutral change to the landscape setting of the Gallops (risks changing the perception of the setting from rural to industrial)
 - It will alter the ambience of the Limekilns - a significant change in this regard would make it less attractive to users and visitors
 - Training horses in an urban environment is a very different proposition and experience to training in a rural environment
 - Urban training and racing does occur, e.g. Hong Kong, Belmont Park (New York) but it is a particular offer and experience - it does not fit the traditional picture of horseracing and could be viewed as a niche
 - Newmarket offers the very best racing facilities in the world while still providing the traditional set up and rural surroundings - this is one of the reasons owners and trainers choose Newmarket - they come to see training and racing in a bucolic environment

- It is entirely possible that owners (e.g. my clients) might not want their horses trained in Newmarket if the environment and ambience of the principal areas where their horses are trained is significantly altered from the way it is today
 - It is important to realise the perception of Newmarket within the horseracing world is that it is rural and is surrounded by countryside
 - Changing the look and feel of a significant part of its surroundings (from entirely rural to something more akin to industrial) could put owners and investors off, it is not what they expect (and is certainly not why they choose Newmarket)
10. What do you consider the impact of the proposed Sunnica scheme on the other racing industry assets you have identified would be?

- Al Bahathri and Long Hill both offer views of the area in which the Sunnica site lies
- These are pleasant rural views providing an important countryside setting for the gallops
- As with the Limekilns (though to a lesser extent) the setting and ambience of these places will be harmed
- Godolphin Chippenham/Snailwell Gallops complex lies adjacent to Sunnica West Site A
- If the development goes ahead, construction noise from the Sunnica scheme could upset highly strung thoroughbreds
- Further, if the equipment installed creates noise (e.g. humming and buzzing) this could also upset horses training on the Godolphin Chippenham/Snailwell Gallops complex (especially if they can't see or don't understand where the noise is coming from)
- The bridleway that runs adjacent to Sunnica West Site A is used for rest and recovery activities for racehorses
- The impacts that would be experienced by the Godolphin Chippenham/Snailwell Gallops complex (gallops etc) would be experienced here also, and probably more acutely

11. What do you consider the impact of the proposed Sunnica scheme on the racing industry in Newmarket as a whole would be?

- **Loss of investment:**
 - If owners and prospective owners (of horses being bred and trained in Newmarket) are put off Newmarket by development like the Sunnica proposals they will move their horses elsewhere
- For some owners, horses are a hobby or a distraction, for others they are a significant financial investment - in either case a negative change in the setting and ambience of key industry assets in Newmarket (including one of the most significant - the Limekilns) could easily cause owners with interests in Newmarket to look elsewhere, and it could deter prospective owners also:
 - In the case of enthusiasts - the 'experience'/experiences associated with their investment is/are one of the key reasons for investing:
 - a standout experience for every owner is seeing their horse(s) in training in the run up to big races
 - The Limekilns (and some of the other industry assets identified) are a crucial asset for this purpose
 - the experience for owners of witnessing their horse finding its form in the lead up to a big race, in one of most beautiful and iconic settings in the racing world, would undoubtedly be negatively affected by a significant discordant change in that setting - one that reduces its beauty and erodes the present day representation of the historic

- relationship (established in Newmarket) between horseracing and the open countryside
 - because owners' 'experience' /experiences will be negatively impacted by proposals like Sunnica this aspect of their 'return' on their investment will be reduced
 - they are therefore less likely to maintain that investment (in Newmarket at least)
- For owners for whom horses are a deliberate distraction from the other aspects of their lives - the more positive the distraction the better:
 - While they are less likely to be concerned with the quality of their experience per se they will not want their 'distraction' to develop negative connotations and associations that make it less pleasant (else some of the benefit of the distraction would be lost);
 - In this sense they are likely to want things to be relatively harmonious and the status quo (which they accept and are happy with) to continue.
- In the case of 'serious' investors - because they may have concerns about Newmarket's will and ability to protect and preserve its horseracing industry (including its associated assets and interests), and therefore the long term prospects for breeding and training in Newmarket
 - even just an element of doubt when dealing with horses worth millions of pounds could easily be sufficient for such investors to move their horses elsewhere
 - not least because investors are constantly seeking the best of the best - pursuit of perfection is not uncommon
 - they regularly re-assess their options (many employ people to do exactly this for them) and have no qualms about changing their plans and approach, especially as cost is often not a consideration
- It is a constant challenge (and the result of a concerted and coordinated effort by numerous individuals, businesses and organisations) to attract owners to Newmarket and to retain them but we can't overcome issues beyond our control (e.g. development like Sunnica)
- It's all very well asserting that Newmarket is the best place in the world for breeding, training and racing horses but we have to constantly demonstrate it if we want to maintain this position
- If we can't do this Newmarket will lose its position
- **Reputational impact:**
 - If developments like Sunnica are allowed to take place the message that will be sent to the horseracing world is that the authorities responsible for Newmarket (and to an extent the town itself, the surrounding villages, the local communities and the horseracing industry) don't take its role and significance within the horseracing industry seriously and are not concerned about protecting it
 - This would be a completely false and very unfair representation of most if not all of these groups, some of whom spend a considerable amount of time and effort protecting Newmarket's horseracing interests
 - If those investing large sums in Newmarket are not confident that the authorities and others with a stake in protecting and promoting Newmarket's racing industry are willing and able to do so they may well look elsewhere (to other places that offer them greater comfort and reassurance that all of the things their investment needs will be prioritised, protected and maintained, and that they will get the best that is on offer)

SIMON CRISFORD

Experience

- **Time in horseracing industry:** since 1981 (Newmarket based since 1985)
- **Roles/positions held (past):**
 - Stud hand (1981 - 1983)
 - Assistant Trainer (1983 - 1986)
 - Journalist, Racing Post (1986 - 1989)
 - Assistant Racing Manager, Darley Stud Management Company (1989 - 1991)
 - Racing Manager, Godolphin (1991 - 2014)
- **Roles/positions held (current):** Director and Trainer, Gainsborough Thoroughbreds [REDACTED] - with over 100 horses in training in Newmarket for clients from around the world (including Europe, the Middle East, America and Japan)
- **Other roles/positions held:**
 - Member, National Trainers Federation
- **Notable successes:**
 - Dubai Millennium [REDACTED]
 - Daylami ([REDACTED] i)
 - Fantastic Light ([REDACTED])
 - Lammtarra [REDACTED]

Responses to questions

1. What is Newmarket's position in the horseracing world?
 - Simply put, it is the global capital and home of horseracing and has been ever since 1660
 - Horseracing is unlikely to have become sport it has without Newmarket
 - The largest racehorse breeding and training centre in world
 - A magnet to international investors
2. Why does it hold this position?
 - Because:
 - horseracing has had a significant influence on Newmarket's evolution and development over time
 - of its horseracing heritage (history and tradition), culture and services facilities (including racecourses and bloodstock sales)
3. To what extent is Newmarket's position in horseracing world secure?
 - It is only as secure as owners/investors make it
 - As soon as owners/investors see what they consider to be a better alternative they will relocate
 - They won't support horseracing in Newmarket just because it's Newmarket
 - Many owners/investors are from overseas - they can invest anywhere in the world
 - If they perceive that Newmarket will be negatively impacted to the extent that alternative locations might provide a better offer they will look elsewhere
 - This is of concern to all of the horse racing related operations in Newmarket
4. Who/what are the challengers/challenges / potential challengers/challenges?

- Anywhere in the world that can offer a better environment and facilities than Newmarket for breeding and training racehorses

5. Why are the challengers/challenges identified above challenging Newmarket?

- Owners/investors' currency is their stallions and mares - they are relatively quick and easy to relocate anywhere in the world (and cost, in most cases, is unlikely to be an issue for them)
- Indeed many horses are moved from country to country and/or continent to continent several times during their lives
- Bloodstock is a very valuable asset to Newmarket (is a big part of the industry's value in Newmarket) - if this bloodstock is relocated the industry will be seriously harmed

6. What is the significance of the Limekilns as a horseracing industry asset in their own right?

- They are peat moss turf gallops which are the result of almost 200 hundred years of expert tending and development
- They are the best public grass gallops in the UK
- Because of the combination of their layout, topography and the quality of the turf they are very popular - much more so than the other gallops in Newmarket
- The fact that they are relatively flat allows the horses to extend themselves a bit more than on Newmarket's hillier gallops but the gentle gradient is still sufficient to work them
- There are multiple gallops on the Limekilns but the two special gallops (for which trainers have to pay extra), the Golden Mile and the Round Gallop, are typically used 800 - 900 times a year and 500 - 725 times a year respectively (this includes multiple uses by the same horse)
- When one considers that the Limekilns are only open from April to September this gives you an idea of how intensively they are used
- Lots of owners go to the Limekilns to watch their horses; to help understand why, one can think of horses in a similar manner to children at school - most parents probably wouldn't watch all of their children's sports lessons or training sessions but they would try to watch their matches or competitions
- It would require a huge amount of time to watch every session, and perhaps get rather mundane, but their matches are important occasions, and are exciting
- Watching a training session on the Limekilns is as close as you can get to a watching your horse race without it actually going to a race
- Given that racing opportunities are limited, watching a horse in training on the Limekilns is an excellent opportunity to see its form and feel the sense of anticipation and the excitement for an upcoming race
- Further, it provides an opportunity to do this in calm and beautiful surroundings (it is a chance to enjoy the performance without the hype, noise, pressure and formality of race day)
- There is nothing quite like seeing a horse train in beautiful scenery, with beautiful turf underneath it
- Training in urban areas, which occurs in other parts of the world, is claustrophobic comparatively, and is much less natural and less good for the horses (and is a very different experience for the people training and watching the horses too)
- The Limekilns has a real sense of place - an ambience and a unique and iconic identity; there is a reason that the first picture you see on the discovernewmarket.co.uk website is of the Limekilns

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7. What is the significance of the Limekilns as a horseracing industry asset relative to similar racing industry assets?
- The Limekilns are the best gallops in Newmarket
 - Anyone with a connection to the horseracing industry visiting Newmarket knows that the Limekilns are the best gallops in Newmarket and that they have hosted some the greatest horses of all time
 - They are located in the largest racehorse training centre in the world
 - They are the most famous turf gallops in the world
 - They are used by the best horses in the world to train for the best races in the world
 - By definition therefore the Limekilns are likely the best gallops in the world
 - Everyone in the horseracing industry in Newmarket would say the same thing
 - Because of the obvious difficulties of directly comparing facilities around the world it is impossible to say with certainty but the Limekilns could reasonably be claimed to be the best grass gallops in the world
8. Are there any other horseracing industry assets that may be affected by proposals like Sunnica?
- Not that I can think of
 - However, this is not necessarily what matters
 - Perception is perhaps more important - people don't necessarily understand the nature and extent of the impacts
9. What do you consider the impact of the proposed Sunnica scheme on the Limekilns would be?
- Many of our clients visit Newmarket regularly to see their horses being trained
 - Every day during the season there are likely to be visitors to the Limekilns - owners who've come to see their horses train
 - The proposed Sunnica development would undoubtedly have a negative impact on them
 - It is a massive development, it is not discreetly placed, and its visual impacts on the limekilns are not able to be mitigated
 - For those who already know the Limekilns it would change their perception of the place forever - the main views from the Limekilns (one of the most noticeable things about them given their elevation/hillside location) would be less rural, as a matter of fact, be less green, less natural, less pleasant and less in keeping with the gallops themselves
 - The solar panels would not be congruent in form or appearance with their surroundings
 - The development would therefore erode the integrity of the landscape and the relationship between horseracing, the heath and the surrounding countryside that is the foundation of the industry and remains one of the strongest attractions of Newmarket for owners to this day
 - For those who come to know the Limekilns after the development has taken place, they will always know it as a place without the strong rural character which is so intrinsically linked to the genesis and sport of horseracing in Newmarket
 - In addition to the matters already mentioned, no one seems to understand the environmental impact that the scheme may have on the land, on wildlife and on horses - my clients certainly don't
 - This is a real concern when it comes to decision making because at best it delays decisions until people do understand (or think they understand) and, at worst, it puts them off altogether (particularly if they have other options, as wealthy footloose individuals do)

10. What do you consider the impact of the proposed Sunnica scheme on the other racing industry assets you have identified would be?

- n/a (see answer to question 8 above)

11. What do you consider the impact of the proposed Sunnica scheme on the racing industry in Newmarket as a whole would be?

- It would be the UK's largest solar farm and would be located adjacent to some of Newmarket's finest training grounds and stud farms
- There is no question that it would erode the integrity of the landscape seen from the Limekilns and the relationship between horseracing, the heath and the surrounding countryside that is the foundation of the industry and Newmarket
- This would be strongly felt by those who know the Limekilns already but would still impact those visiting the gallops for the first time - the proposed development simply would not fit with its surroundings - it would be obvious, discordant and harmful (whether you had experienced the Limekilns before it was there or not)
- Further, it is impossible to know what the full overall impact would be until we understand the environmental impacts
- Uncertainty is the main problem at the moment - there is a significant lack of clarity with regard to the possible effects
- Not understanding the negative impacts, as most don't, won't prevent owners/investors looking elsewhere however - the mere perception of a negative impact is enough
- Even a small chance of negative effects is a massive problem for the town
- If owners/investors perceive there to be a risk to their horses they will move them elsewhere
- This includes my clients (the horses in training with me are typically worth £100k but the most valuable are worth £500,000 - £750,000)
- We have discussed the Sunnica scheme with a number of them, some have indicated that the prospect of having their horses being trained or bred near the proposed scheme would compromise their investment and give them no option but to consider relocating their horses
- The racing heritage and tradition of Newmarket is renowned worldwide, which is why it attracts so many of the premier racehorse owners and breeders
- Part of reason they choose Newmarket is because it is the hub of international horseracing, it has the best stud farms, the best stallions, the best mares, the best sales, the best trainers, the best work riders; it has farriers, saddlers, horse transport companies and so on - a huge range of professions, trades and specialisms
- The scheme would harm, at multiple levels, this industry that has made Newmarket such a respected and attractive centre for racehorse owners
- My business relies on all of these other businesses and I can't afford to lose them
- All trainers would be threatened either directly or indirectly by the development (or both)
- It would unquestionably threaten the continued support from the major international clients that have interests in Newmarket and the surrounding area
- If our clients relocate, closing or relocating our business would become a distinct possibility
- Newmarket is home to hundreds of millions of pounds worth of bloodstock - loss of even a relatively small proportion of this 'resource' to other breeding and training centres would likely harm Newmarket's significance and position in the horseracing world, and would be hard to reverse

HUGH ANDERSON

Experience

- **Time in horseracing industry:** 15 years
- **Roles/positions held (past):** n/a
- **Roles/positions held (current):** Managing Director, Godolphin UK & Dubai
[REDACTED]
- **Other roles/positions held:**
 - Member, Newmarket Horsemen's Group (2009 - present)
- **Notable successes:**
 - Winner of the British Horseracing Authority Flat Owners Championship 14 times in the last 15 years
 - Winner of all three industry flat racing championships in 2022:
 - Winner of the Professional Jockeys Association Flat Jockeys Championship 2022 (William Buick - based in Newmarket)
 - Winner of the British Horseracing Authority Flat Trainers Championship (Charlie Appleby - based in Newmarket)
 - Winner of the British Horseracing Authority Flat Owners Championship 2022

Responses to questions

1. What is Newmarket's position in the horseracing world?

- Pre-eminent, second to none
- The home of flat racing
- It is therefore seen as the global headquarters for owners, trainers and breeders
- There is nowhere else like it in any of the other top horseracing nations (Ireland, France, Dubai, Japan, Australia)

2. Why does it hold this position?

- Horseracing is unusual in that it works better when competing breeders and trainers are located close to one another (i.e. when clustering occurs)
- Proximity allows the sharing of resources and specialisation
- Over the centuries Newmarket has attracted the very best in the horseracing world and its position has become stronger and stronger as the cluster has grown
- Lexington in Kentucky and Chantilly near Paris have a similar profile but still don't have what Newmarket has to offer - they're not able to offer everything together in the same place
- Godolphin is an international operation - they can base themselves anywhere in the world; the reason they choose to be in Newmarket is that it is the one place in the world that offers breeding, training and racing and the full gamut of related facilities and services, all at the highest level

3. To what extent is Newmarket's position in horseracing world secure?

- It cannot be taken for granted that owners/investors will continue to have their horses bred and trained in Newmarket because of the position it currently enjoys
- If the factors that make Newmarket what it is start to get eroded, owners/investors will look elsewhere

4. Who/what are the challengers/challenges / potential challengers/challenges?

- Abroad:
 - Australia - where racing is becoming increasingly lucrative, and where there is plenty of space/countryside for training horses
 - Chantilly, France
- In the UK:
 - Lambourn, Berkshire
 - Middleham, Yorkshire

5. Why are the challengers/challenges identified above challenging Newmarket?

- Newmarket is becoming increasingly urbanised and congested, which is making it harder and less pleasant for the horseracing industry to carry out its day-to-day activities (NB consistency is key in racehorse training - these regular activities, e.g. training sessions, are essential for success)
- If this trend continues, owners/investors will start to move their interests to other locations and Newmarket (including its position at the top of the horseracing world) will start to suffer

6. What is the significance of the Limekilns as a horseracing industry asset in their own right?

- They are considered hallowed ground in the horseracing world (a bit like Lord's is among cricketers and cricket fans)
- It is a fantastic facility for training horses (especially over longer distances)
- They very effectively replicate the conditions of some of Britain's most important racecourses, not least because they are flat, expansive and quiet
- The quality of turf is second to none (this is important from an injury prevention point of view, particularly given their use in the run up to key events)
- For this reason the Limekilns is the ultimate place to train horses when preparing them for key races

7. What is the significance of the Limekilns as a horseracing industry asset relative to similar horseracing industry assets?

- They are a unique training ground - I can't think of anywhere that has the scope, scale and consistency of the Limekilns
- In a lot of horseracing centres around the world training takes place only on the racetrack
- Newmarket has an almost limitless set of options for training and the Limekilns are a crucial component of that set

8. Are there any other horseracing industry assets that may be affected by proposals like Sunnica?

- Yes:
 1. Godolphin's Chippenham/Snailwell Gallops complex (gallops etc) that lies adjacent to the proposed Sunnica West Site A (known as Chippenham/Snailwell Gallops)
 2. The public bridleway between Godolphin's Chippenham/Snailwell Gallops complex and Sunnica West Site A
- The Chippenham/Snailwell Gallops have existed for 40 - 50 years but came into their own 20 - 30 years ago

- They are a private facility of racecourse quality and are the subject of significant ongoing investment
- Their 300 acres provide a range of different options for trainers:
 - all are up hill so as to offer an appropriate level of challenge for the horses in training
 - one of the gallops includes a bend, which allows most race scenarios to be recreated
- Godolphin still makes considerable use of the other training areas in the town, including the Limekilns (its training activities are split approximately 30%/70% private gallops to public gallops)

9. What do you consider the impact of the proposed Sunnica scheme on the Limekilns would be?

- The vista from the Limekilns would be dramatically and negatively altered
- When on the Limekilns you will no longer feel like you're in the countryside, which would be a great loss
- The proposed solar farm would desecrate the rural setting in which the horseracing industry in Newmarket is used to training and racing horses
- This rural setting is undoubtedly a draw to some owners/investors, who:
 - are often extremely wealthy people with a lot of choice
 - have decided that they want their horses to be trained in Newmarket because of what it is today
 - if what Newmarket offers today is negatively impacted by development and important and memorable views are lost as a result, there's a real possibility that owners/investors will decide that the quality of Newmarket's unique offer and setting have been diminished, and they will look elsewhere as a result

10. What do you consider the impact of the proposed Sunnica scheme on the other horseracing industry assets you have identified would be?

1. Godolphin's Chippenham/Snailwell Gallops complex

- There would likely be noise, dust, movement/activity and vehicular traffic related impacts particularly with respect to horses in training during the construction phase
- There may also be impacts associated with the development once it is operational (again, particularly with respect to horses in training) as a result of noise and glint and glare (little is known about either of these issues)

2. Public bridleway between Godolphin's Chippenham/Snailwell Gallops complex and Sunnica West Site A

- The impacts set out above would occur here also

11. What do you consider the impact of the proposed Sunnica scheme on the racing industry in Newmarket as a whole would be?

- As set out above, Newmarket is not immune to challenge
- Breeding, training and racing horses in Newmarket is a rural activity
- It is an attractive place to raise, train and race horses; nearly 2800 acres of solar farm development will undoubtedly reduce its attractiveness
- Newmarket is becoming increasingly urbanised and congested
- Owners/investors are typically wealthy people - they have a lot of choice and are picky - they want the best for themselves and their animals so are sensitive to change;

even to small changes, changes in softer or more subjective factors (like beauty and attractiveness) or even just the perception that change will occur

- There is an increasing risk (as a result of urbanising proposals like Sunnica) that owners/investors will decide that Newmarket is no longer an attractive place to keep, breed and train their highly valuable (sometimes multi-million pound) horses
- Word will get round - there is a degree of group think among owners/investors - negative views will be contagious
- From a training point of view, all competitors work together synergistically in Newmarket
- The moment one major owner, breeder or trainer pulls out there is a risk that others will follow suit and that all will start to feel that Newmarket's unique offer has been diminished
- If the town were to lose even a quarter of its owners, breeders and/or trainers the industry in Newmarket would be irreparably damaged
- In the case of Godolphin, the decision about whether to stay in Newmarket would depend on a number of factors; the accumulation or convergence of a number of negative impacts or factors, of which the approval of the Sunnica scheme could be one, could result in a decision to move its Newmarket operation elsewhere
- The racing industry in Newmarket is a multi-million dollar jewel in the crown of the local area that is constantly seeking inward investment - it would be a high stakes game to risk inflicting on the horseracing industry the kinds of impacts that the Sunnica scheme could cause
- Allowing proposals like Sunnica to go ahead would be very damaging to what might be described as a 'blue-chip' part of our countryside

WILLIAM JARVIS

Experience

- **Time in horseracing industry:** 43 years (and lifelong resident of Newmarket)
- **Roles/positions held (past):** Assistant Trainer (under Henry Cecil) (1979 - 1984)
- **Roles/positions held (current):** Trainer, Phantom House Stables (1984 - present)
- **Other roles/positions held:**
 - Vice Chairman, Newmarket Trainers Federation (2010 - 2018)
 - Chairman, Newmarket Trainers Federation (2018 - present)
- **Notable successes:**
 - Lady Bowthorpe - Nassau Stakes, Goodwood
 - Grand Lodge (best European two-year-old in 1993)
 - over 850 winners in total

Responses to questions

1. What is Newmarket's position in the horseracing world?

- The most amazing collection of racehorse breeding, training, and racing assets including the Heath and its natural surroundings
- Incomparable - it is what every horseracing centre in the world would like to be and models themselves on
- It is Europe's leading home for thoroughbreds (and probably the world's too)
- While dominance of the industry does fluctuate to an extent, Newmarket certainly sits at the top of the industry at the moment, as is evidenced by the fact that:
 - Dubawi & Frankel (the two best stallions in world) both stand at stud in/near Newmarket
 - Frankel and Baa'ed were both trained in Newmarket
 - 4 out of 5 of this year's⁵ classic winners were trained in Newmarket (the winners of the 1000 Guineas Stakes, the 2000 Guineas Stakes, the Epsom Derby and St Leger Stakes) - each trained by a different Newmarket based trainer
 - This year's⁶ winner of the Prix de L'arc de Triomphe was trained in Newmarket
 - The top three trainers in England, in terms of prize money won, are all based in Newmarket

2. Why does it hold this position?

- It has the best facilities in the world for training horses (the numerous training grounds that comprise the Heath) - owned and managed to the highest standard by Jockey Club Estates
- It has many of the world's best studs (as is illustrated by the fact that Frankel stands at stud just outside Newmarket) and world's leading bloodstock auction house
- It has outstanding vet practices and other supporting services and facilities
- Because of its horseracing heritage and culture (which goes back to King Charles II and is partially captured in the Jockey Club Rooms and the National Horseracing Museum)

⁵ 2022

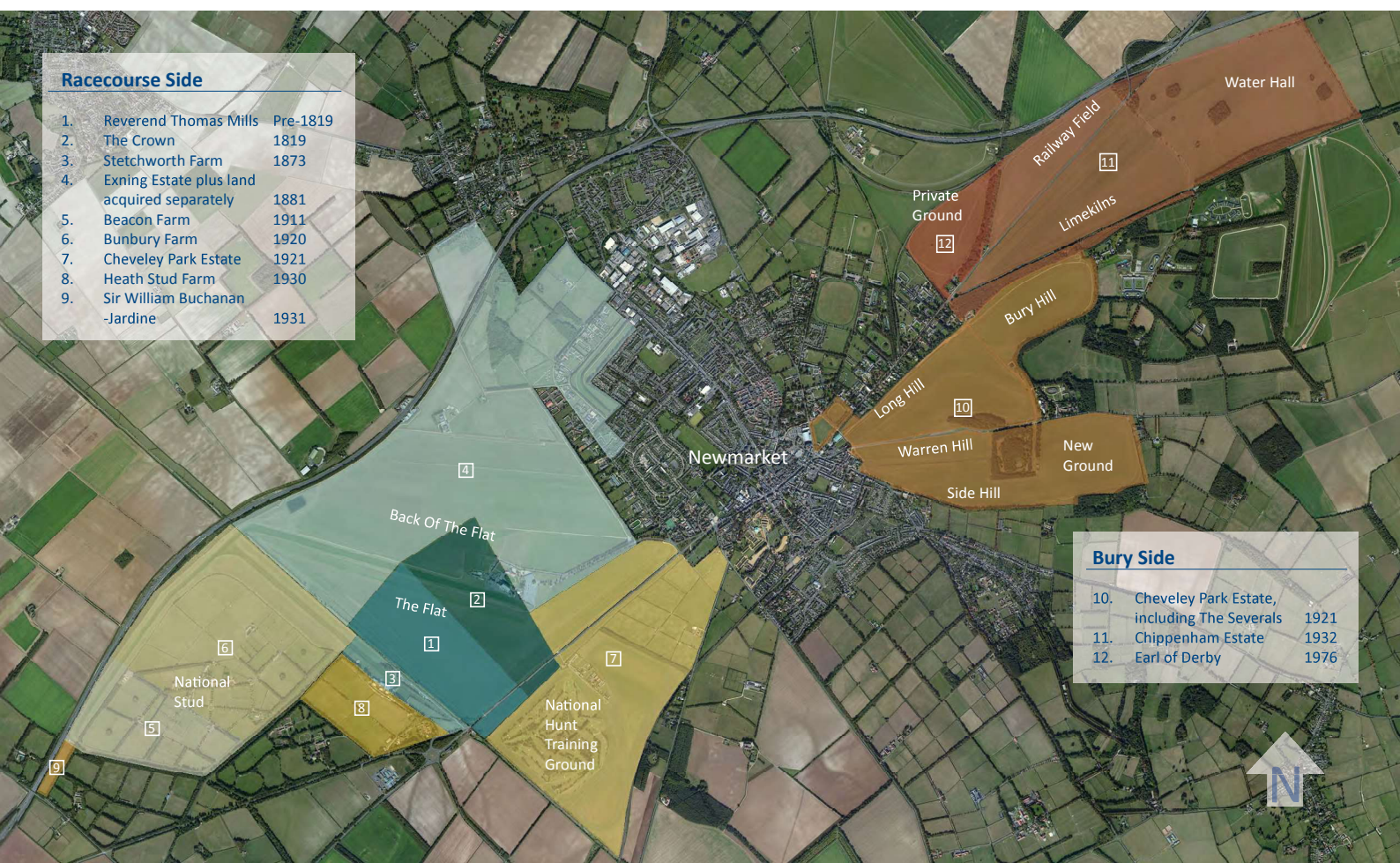
⁶ 2022

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- It has one of the oldest horse races in the world - the Newmarket town plate - instigated by King Charles II and running since 1666
3. To what extent is Newmarket's position in horseracing world secure?
- The racing industry in Newmarket wants it to continue to be a centre of excellence
 - It can't be complacent and must keep with the times in order to achieve this
 - It is heavily reliant on foreign investment
 - Development of the wrong kind and in the wrong place could harm the horseracing industry and the town
 - Proposals like Hatchfield Farm and Sunnica have threatened/are threatening to do this
 - The industry accepts that change is inevitable and is necessary but the change needs to be sustainable and positive
 - The experience for investors, visitors, workers and the local community alike needs to be positive
4. Who/what are the challengers/challenges / potential challengers/challenges?
- Abroad:
 - France
 - Hong Kong
 - Australia
 - In the UK:
 - Somewhere outside England (possibly Ireland) - the demise of Newmarket would mean the demise of English racing
 - Ireland has a very strong breeding industry
5. Why are the challengers/challenges identified above challenging Newmarket?
- France - because of its proximity and the higher prize money on offer (though their racing is done in a very different way)
 - Hong Kong - because the horseracing industry in Hong Kong is doing well at the moment
 - Australia - because the horseracing industry in Australia is doing well at the moment
 - Ireland - because it has a very strong breeding industry
6. What is the significance of the Limekilns as a horseracing industry asset in their own right?
- They comprise four gallops (The Golden Mile, Round Gallop (1 $\frac{3}{4}$ miles including two bends), Short Gallop, Long Gallop (1 $\frac{1}{2}$ miles in a straight line) and a canter
 - The ground has never been ploughed meaning that the turf is very kind to horses (peat moss has been applied over an extensive period and the gallops are beautifully maintained)
 - The gallops on the Limekilns are therefore excellent at replicating race conditions while minimising impacts on/the risk of injury to horses
 - Horses being prepared for the Epsom Derby and Royal Ascot are given their final exercise and gallop on the Limekilns for this reason
7. What is the significance of the Limekilns as a horseracing industry asset relative to similar racing industry assets?
- They are the best gallops in Newmarket, the best in the UK and possibly the best in Europe
 - There's nothing comparable to the Limekilns anywhere else in world

-
8. Are there any other horseracing industry assets that may be affected by proposals like Sunnica?
- Yes:
 1. The Railway Field
 2. Al-Bahathri (all weather gallop)
 - The Al-Bahathri gallop is open 365 days a year and is probably used more than the Limekilns (The Limekilns is only open on a limited basis from April - Sept, a bit like Lords or Centre Court at Wimbledon)
9. What do you consider the impact of the proposed Sunnica scheme on the Limekilns would be?
- It would make it a less pleasant experience
 - One enjoys a sense of rural beauty when standing on the Limekilns looking out to the north; this includes views of Ely cathedral on a clear day
 - If I'm training a horse for a big race and plan to gallop it on The Limekilns or Al-Bahathri I notify the owner so that they have the opportunity to witness it first hand (and, typically, they will travel to Newmarket specifically to do so)
 - As a result, three quarters of the time I train on the Limekilns I'm accompanied by owners, prospective owners or racing managers (racing managers report to owners or prospective owners on how their horses are being trained and are performing)
 - For most owners it's their dream to see their horse gallop really well in advance of a race (it's why owners invest £25 - 30k a year on average in their horses)
 - The experience is the combination of the anticipation of the race, the horse's form and the backdrop/setting for the event (in this case the Limekilns, Al-Bahathri etc)
 - If this combination suffers because the quality of the backdrop is reduced/the ambience changes, the overall experience will be harmed
 - Owners will certainly disapprove of what Sunnica would do to this iconic location/backdrop/setting and some may be put off Newmarket by it altogether
 - Because of their wealth and the ease with which horses can be moved, owners will simply choose another location for their horse(s) to be trained if they merely perceive that Newmarket is taking a turn for the worse, or if they don't like the message that approval of the Sunnica application would send
10. What do you consider the impact of the proposed Sunnica scheme on the other racing industry assets you have identified would be?
- As above
11. What do you consider the impact of the proposed Sunnica scheme on the racing industry in Newmarket as a whole would be?
- It could be serious (not least because of the duration of the construction phase and its associated impacts)
 - It is unlikely to spell the end of Newmarket as a training centre but it would make things very difficult for the next 5 - 10 years if owners started to move their horses away from Newmarket
 - New investment by owners (in the breeding and racing of horses) is unlikely to be secured in the areas that are directly affected by the development and existing investment might be pulled out or may simply dwindle
 - Those close to the scheme, e.g. Ibrahim Araci (who bought Old Mill Stud, Chippenham only a few years ago), are likely to be most significantly affected

-
- Brookside Stud, Chippenham is another example

APPENDIX 3 - JOCKEY CLUB ESTATES 2015 PLAN



The Jockey Club has acquired land in and around Newmarket since the 18th Century. This simplified map shows when the main parcels of land were added to the Estate and the vendor.

Jockey Club Estates 2015

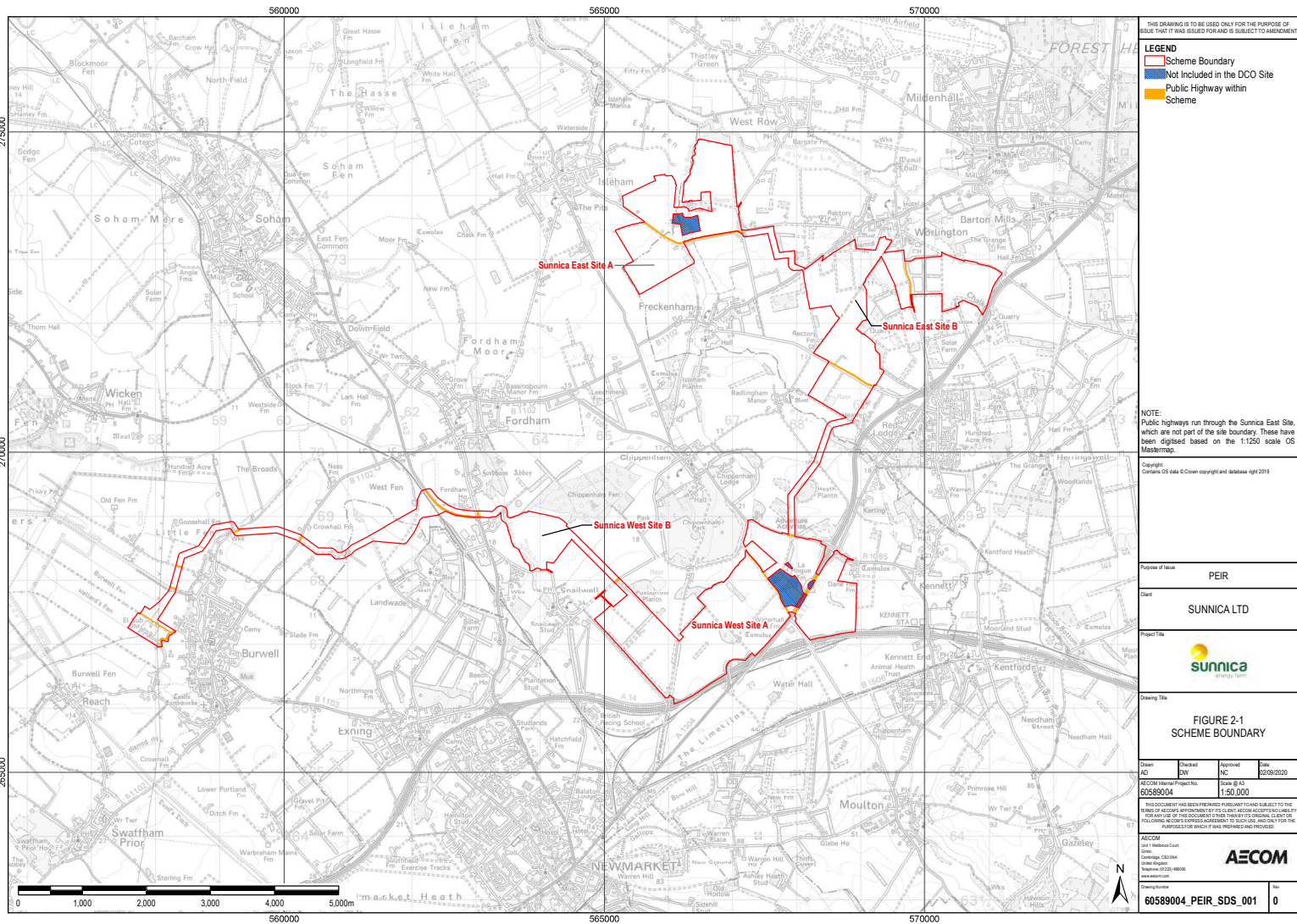
APPENDIX 4 - NEWMARKET STUDS PLAN

Newmarket Stud Plan



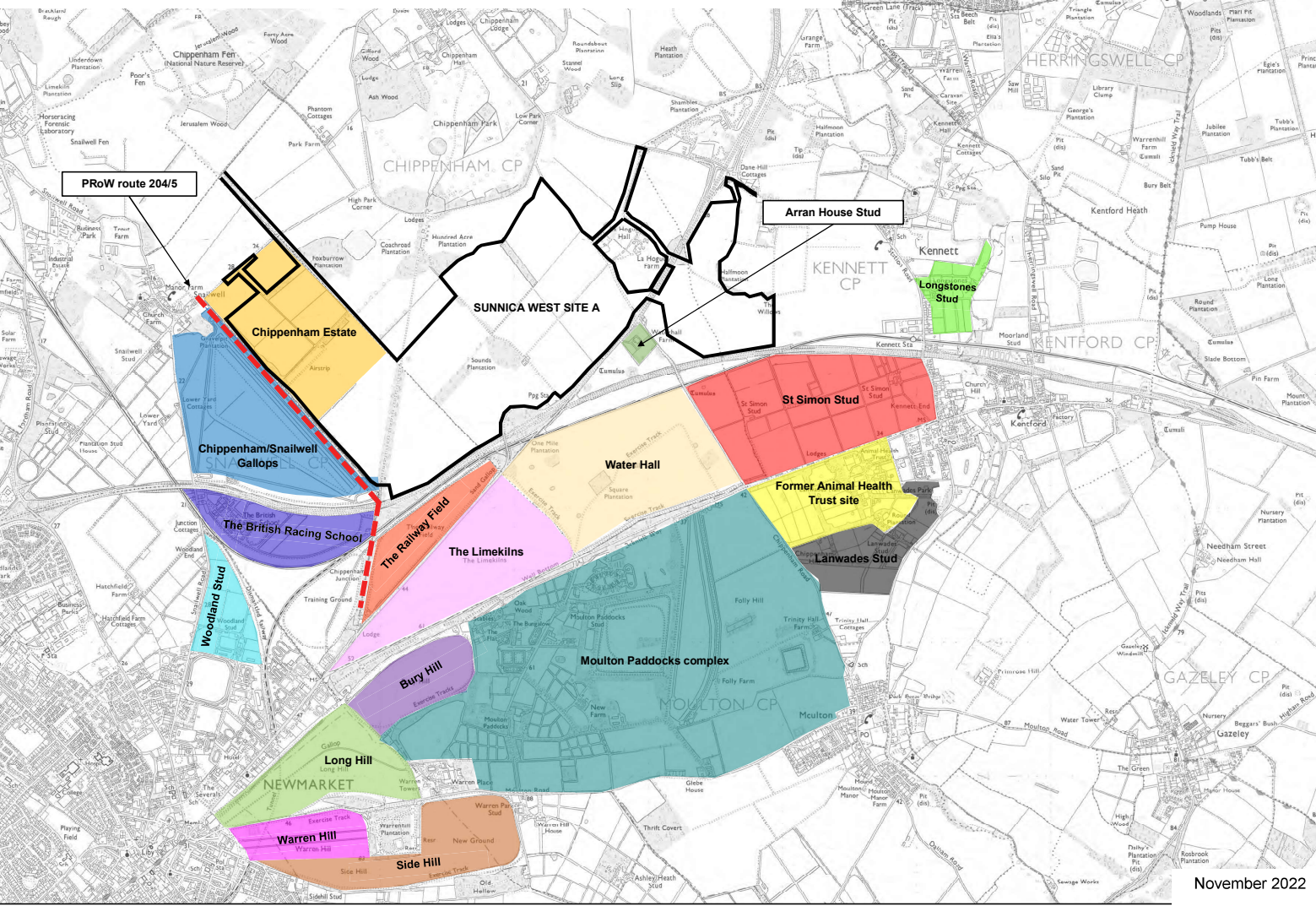
- Legend**
- Training Ground and Yards
 - Equine Hospital
 - 01 - Mr Al-Rasheed - Widgham Park
 - 02 - Animal Health Trust
 - 03 - Mr J S Bell - Shirley Stud
 - 04 - Bolfa - Fitticks Stud (Cheveley)
 - 05 - British Horse Racing School
 - 06 - Mr Eric Cantillon - Herringwell Manor Stud
 - 07 - Chippingham Estate
 - 08 - Mr Walter & Fran Cove - Arran House Stud
 - 09 - Mr Robert Cowell - Bottisham Heath Stud
 - 10 - Mr Duncan Crawford - East Green
 - 11 - Miss Nicky Crisp & Mr Will Barker - Brook Farm
 - 12 - Mr J S Crowhurst - Poole Farm & Crookfords Stud
 - 13 - Mr & Mrs L Curni - Fitticks Stud
 - 14 - Curley Leisure Ltd - Little Heaven Stud
 - 15 - Mr David Curran - Gazeley Stud
 - 16 - Darley
 - 17 - The Earl of Derby - Woodland Stud/Stanley House/Stanley Estates
 - 18 - Mr & Mrs L Dettori - Hare Park
 - 19 - Mr & Mrs S Dudley - Hope Hall Stud
 - 20 - Eldon Farms - Northmoor Stud
 - 21 - Mr R Fenwick - Longbones Stud
 - 22 - Mr John Ferguson - Bloomfields Stud
 - 23 - Mr S M Fustak - Deerfield Farm
 - 24 - Mr S Gibson - Red House Stud
 - 25 - Godolphin - Chippingham Gallops & Moulton Paddocks
 - 26 - Mr Guy Gredley - Widgham Farm
 - 27 - Mr W L Gredley - Stachworth Park Stud
 - 28 - Mr Trevor Harris - Lordship Stud
 - 29 - Mr Guy Heald - Egerton Stud
 - 30 - Mr John James - Brookside Stud
 - 31 - Jockey Club
 - 32 - Juddmonte Farms
 - 33 - Julia Felben Racing - Harraton Stud
 - 34 - Mary Kennell - Rosyground Stud
 - 35 - Mr & Mrs R G Levin - Swayford Paddocks Stud
 - 36 - Loder Racing (Kate & Harriet Loder - Marwell Stud
 - 37 - Mrs K M Mack - Lower Hare Park Stud
 - 38 - Meddall Properties - Meddall Stud (b)
 - 39 - Mr Richard Morgan-Evans - Great Bradley Oak Stud
 - 40 - Mr Hasnam al Nakheeb - Harefield Park
 - 41 - Mr Faraz Nase - Alsbake Stud
 - 42 - National Stud
 - 43 - Newmarket Equine Hospital
 - 44 - Mr Michael O'Leary - Plantation Stud
 - 45 - Mr Anthony Oppenheimer - Hascombe & Valient Studs
 - 46 - Mr Jim Paltridge - Westley Waterless IRT
 - 47 - Mr Ed Peate - Penny Farm
 - 48 - Dilp Rahulan - Chippingham Lodge
 - 49 - Mr & Mrs J M Radcliff - Manor Farm Stud
 - 50 - Ms K Rausing - Lamwades Stud, Meddall Stud (a) & St. Simon Stud
 - 51 - Mr Gary Robinson - Brickfields Stud
 - 52 - Rosedale
 - 53 - Saleh al Sagar - Blue Diamond Stud (south)
 - 54 - Candy Sasse - Executive Stud
 - 55 - Michelle Saunders - Wall House Stud
 - 56 - Mrs Julia Scott - Gbebe Stud
 - 57 - Shadwell Estates Co. Ltd. - Beech House Stud
 - 58 - Mr David Shekels - Old Mill Stud
 - 59 - Shadwell Stud Co. - Snailwell Stud
 - 60 - The Hon. Peter Stanley - New England Stud
 - 61 - Stachworth Estate - Equine Fertility Unit
 - 62 - Sheikh Farid al Thani - Longhodes Stud
 - 63 - Mr D B Thompson - Cheveley Park Stud
 - 64 - Mr & Mrs Mark Tompkins - Dullingham House Stud
 - 65 - Mr John Troy - Willingham House Stud
 - 66 - White Crown Stables - Clare House Stables
 - 67 - Mr Julian Wilson - Grove Farm Stud
 - 68 - Mr Dwayne Woods - Brook Stud
 - 69 - Mr Nick Wright - Badingham Manor
 - 70 - Mr Charlie Wyatt - Dukes Stud
 - 71 - Newmarket Training Yards
 - 72 - Tattersalls
 - 73 - Sheikh Mohamed - Dalham Estate

APPENDIX 5 - FIGURE 2-1 ORDER LIMITS PLAN (DRAWING NUMBER: 60589004_ES_DAS_001)



APPENDIX 6 - PLAN SHOWING GEOGRAPHICAL RELATIONSHIP BETWEEN HORSERACING INDUSTRY ASSETS
AND THE PROPOSED SUNNICA ENERGY FARM SITE

Plan showing geographical relationship between horseracing industry assets and proposed Sunnica Energy Farm site



APPENDIX 7 - ARTWORKS FEATURING THE HORSERACING INDUSTRY AND THE LANDSCAPE NORTH OF NEWMARKET

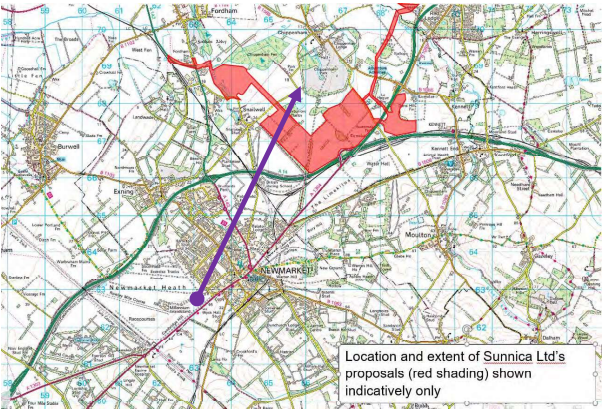
Title: A finish on the Beacon Course, Newmarket



Artist: Peter Tillemans

Date: circa 1720

Plan showing location and direction of view



Description/relevant information:

"The view of the town in the background shows St Mary's Church skewed from the correct alignment and in general the perspective is distinctly odd. This picture or another version of it is the basis for the print (number 19), described as being a view of a race 'over the Long-course from the starting point to ye stand'. As 'ye stand' was six miles from the start at Six Mile Bottom, which was out of sight anyway, accuracy of perspective was hardly the aim. Indeed the reference to the long-course may actually suggest the race had begun at the rarely used eight-mile start near to Babraham."

Source: The Jockey Club Collection: a Catalogue and the Story of its Creation over Three Centuries, David Oldrey (page number 136)

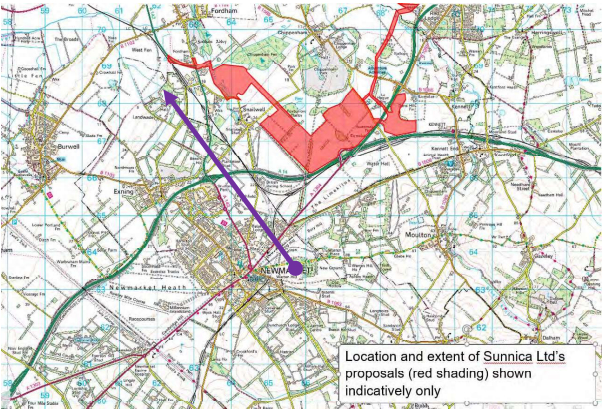
Title: Warren Hill



Artist: John Wootton

Date: circa 1720

Plan showing location and direction of view



Description/relevant information:

"There was a fashion at this period for panoramic views across the town from more or less the same vantage point near the top of Warren Hill. This one is angled slightly more to the right than some, centring on Exning and its village lands, with the racecourse buildings at the edge of the picture. Wootton produced several such paintings and, besides his followers and copyists, Peter Tillemans and James Seymour also added to their number. This is a competent example. The structure on the right was known as the King's Chair and was a small observatory built so that Charles II could watch horses at work on the gallops."

The picture indicates the importance of the long views to the north from Newmarket.

Source(s): The Jockey Club Collection: a Catalogue and the Story of its Creation over Three Centuries, David Oldrey (page number 141); Michelle Bolger Expert Landscape Consultancy

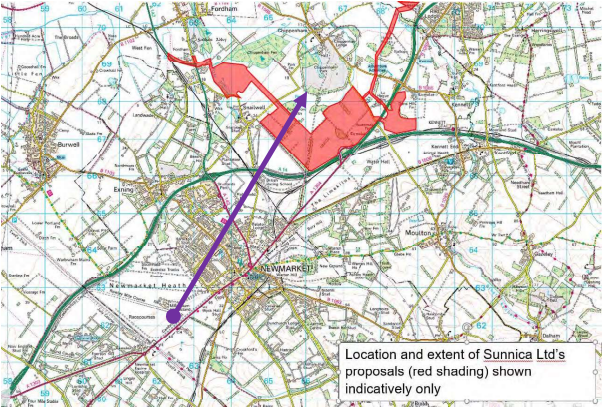
Title: Flying Childers



Artist: James Seymour

Date: 1739

Plan showing location and direction of view



Description/relevant information:

"Flying Childers" by James Seymour. (The entry relating to this picture is a long one as this horse was the supreme champion of the first half of the 18th century and so not really relevant in this context. The life-sized painting hangs at Chatsworth as Childers was a Devonshire horse and he is depicted somewhere near the town side of the Cambridge Gap in the Devil's Ditch. Accordingly you see the town just behind Childers and a long view between him and his jockey, James Larkin, right across to the area of Freckenham).

Source(s): The Heath and the Horse: a History of Newmarket Heath, Timothy Cox, David Oldrey, Richard Nash; David Oldrey (Cover and page number 10, figure 10)

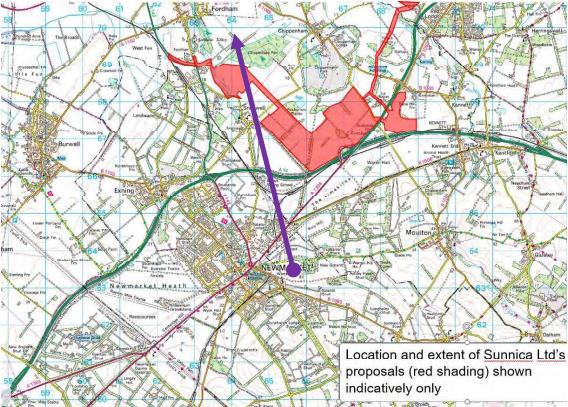
Title: George I at Newmarket in 1717



Artist: John Wootton

Date: 1717

Plan showing location and direction of view



Description/relevant information:

"George 1 at Newmarket in 1717" by John Wootton (probably 1717). The scene is on the lower part of Warren Hill with the King on the grey to the right and Frampton looking out of a coach, while Wootton himself sketches things in the centre. The main features in the town are as usual the two church towers and the Palace, in those days stretching from Palace Street through to the High Street. (It was the King's only visit to Newmarket as the attempt by the assorted grandees depicted to persuade him to take up racing proved entirely unsuccessful. Frampton was Tregonwell Frampton, who had organised the royal horses back to the days of Charles II and held the sinecure of Keeper of the Running Horses. As usual Ely can be seen).

Indicates the importance of the long views to the north from Newmarket with Ely cathedral on the horizon. These views represent the characteristic relationship between Newmarket and its rural setting to the north – the relationship between the Chalk Hills and the Fens.

Source(s): The Heath and the Horse: a History of Newmarket Heath, Timothy Cox, David Oldrey, Richard Nash; David Oldrey (page number 40, figure 29); Michelle Bolger Expert Landscape Consultancy

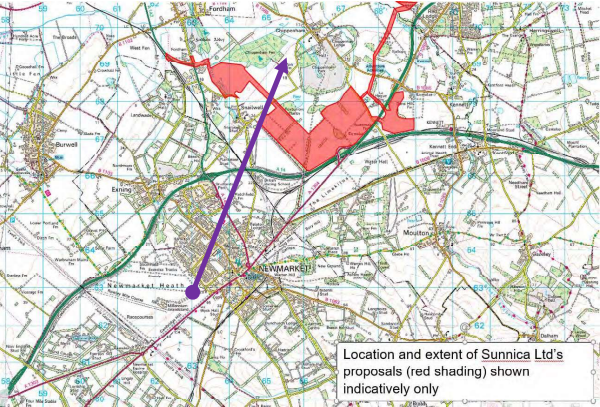
Title: Engraving of “Grey Diomed beating Traveller”



Artist: after J N Sartorius

Date: 1790

Plan showing location and direction of view



Description/relevant information:

"Engraving of Grey Diomed beating Traveller with the Duke of Portland Stand in the background" after J N Sartorius (1790). The stand had only just been erected and stood quite near to the present road down to the Rowley Mile stands, maybe 20 yards or so to the south of the road, out on the Heath. It would have been not very far down from the junction with Hamilton Road. Thus the view will again be towards Ely which I take it is the massive building on the horizon, with Exning closer by on the left. The cathedral looks a bit close to be Ely but I doubt the churches at Burwell or Soham, more or less on that alignment, would be so imposing. You can see the village lands of Exning and Newmarket laid out in their strips all over the middle distance. The Freckenham area is partly obscured by the stand.

Source: The Heath and the Horse: a History of Newmarket Heath, Timothy Cox, David Oldrey, Richard Nash; David Oldrey (page number 100 and figure 65)

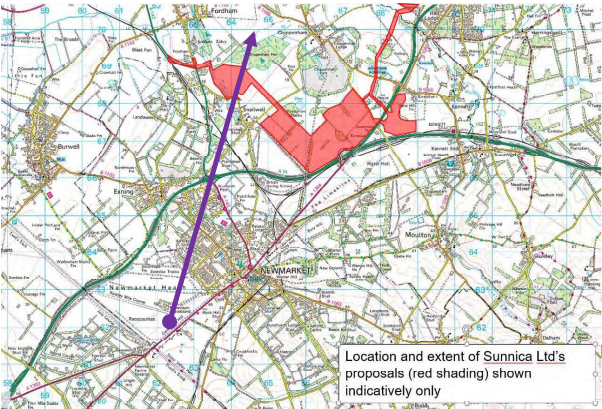
Title: Fulwar Craven on his Norfolk Hackney



Artist: J F Herring Senior

Date: 1834

Plan showing location and direction of view



Description/relevant information:

"Fulwar Craven on his Norfolk Hackney passing Four Mile Stables" by J F Herring senior (1834). (The building stood at the start for the main Beacon Course and the post shown is now in the National Horseracing Museum while a replacement can still be seen in the field to the left just after passing over the bypass. As so often the artist has included the distant Ely close to the stable and Craven is trotting along the road from Cambridge with the entire area of the proposed solar farm stretching beyond the racecourses into the distance).

Source(s): The Heath and the Horse: a History of Newmarket Heath, Timothy Cox, David Oldrey, Richard Nash; David Oldrey (page number 199 and figure 159)

This view of the Derby, taken from the side of the race, shows the horses and jockeys in the midst of the race, with the spectators on horseback and on foot, and the carriage in the foreground. The scene is set on a grassy field with hills in the background. The illustration is signed 'J. G. S. 1811' in the bottom right corner.

Location and extent of Sunnica Ltd's proposals (red shading) shown indicatively only

Engraving of "Warren Hill" after E F Burney (1791) The delights of the Heath in the morning are being experienced by the Prince of Wales and others. The occasion may well be the Prince's visit in early October 1791, only days before the Escape scandal broke. The Prince also appears in Figs. 6 and 57, which shows what an important figure he was during his intermittent bursts of activity on the Turf. (You can see Ely on the horizon. The scandal referred to resulted in George refusing to attend meetings at Newmarket for the rest of his life although he did run horses there when things settled down a bit).

Date: 1791

Source(s): The Heath and the Horse: a History of Newmarket Heath, Timothy Cox, David Oldrey, Richard Nash; David Oldrey

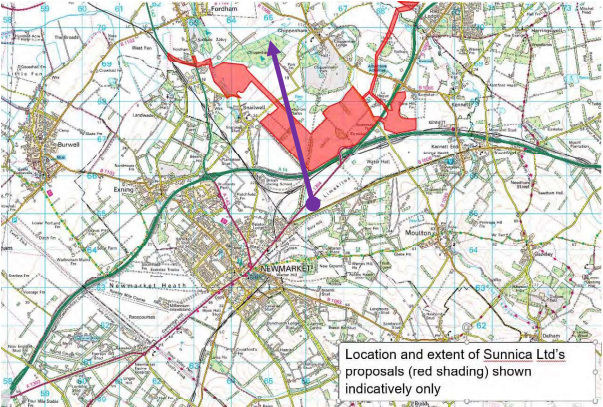
Title: (Trial Gallop on Railway Field)



Artist:

Date:

Plan showing location and direction of view



Description/relevant information:

"... on the Limekilns looking across the road to Norwich. ... up at the top of the ... gallop with the mounted trainer watching the end of a serious gallop or trial. The view is a good deal more towards the north and you can see the grey horse and carriage which will take those on foot home after the gallop parked on the Norwich road."

Source: David Oldrey

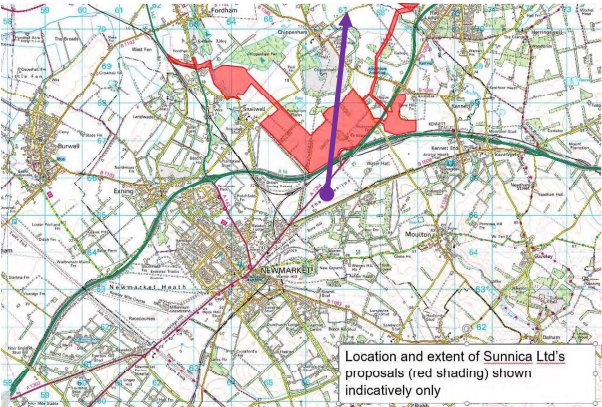
Title: Watching work on the Limekilns



Artist: Allen Culpepper Sealy

Date: late 19th Century

Plan showing location and direction of view



Description/relevant information

"... is by Allen Culpepper Sealy. It is late 19th century, but I have not identified the trainer."

"... on the Limekilns looking across the road to Norwich. ... about halfway up the gallop with the trainer on his hack as his horses work up towards him and in which he seems to show remarkably little interest. The road with its line of telegraph posts running to Norwich is at such an angle that one knows the direction is east north east with the train disappearing behind the trees at the far end of Railway Land."

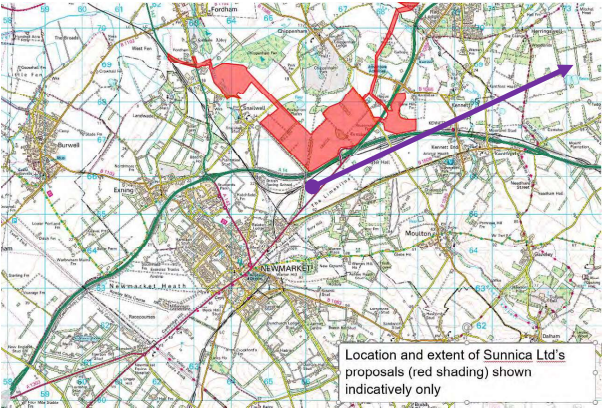
Source: Timothy Cox; David Oldrey

Title: Colonel McCalmont and Captain Machell with their trainer James Jewitt at the top of Limekilns watching their string including the Triple Crown winner Isinglass



Artist: Geoffrey Douglas Giles
Date: 1893

Plan showing location and direction of view



Description/relevant information:

Source:

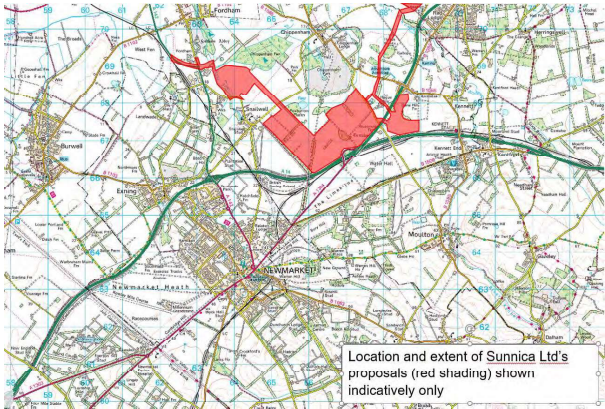
Title: Newmarket, the Lime Kilns



Artist: Lionel Edwards

Date: c. 1945

Plan showing location and direction of view



Description/relevant information

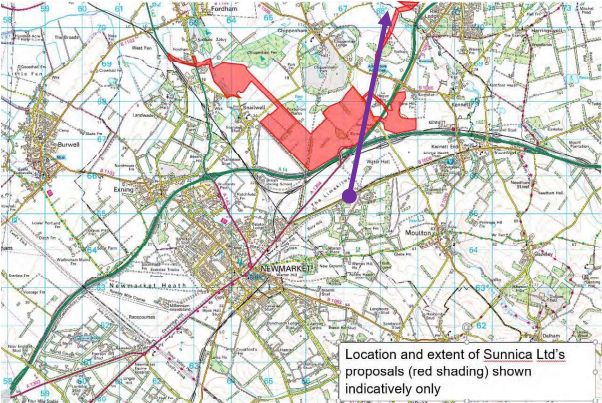
Source:

Title: Newmarket – a trial on the lime kilns



Artist: Lionel Edwards
Date: c. 1945

Plan showing location and direction of view



Description/relevant information:
Scene across the Limekilns from the road to Bury.

Source: David Oldrey

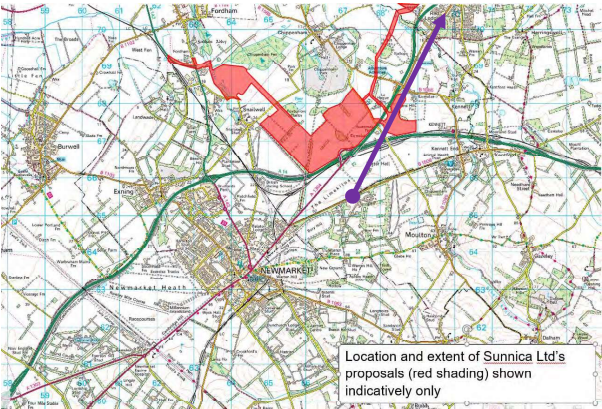
Title: A trial. The Lime Kilns



Facing page 28. A TRIAL. THE LIME KILNS.

Artist: Lionel Edwards
Date: c. 1939

Plan showing location and direction of view



Description/relevant information:
Scene across the Limekilns from the road to Bury.

Source: David Oldrey