

Stoughton Cross House, Stoughton Cross, Wedmore, Somerset, BS28 4QP

Tel: 01934 712041 Mobile: 07801 321162 Fax: 01934 712118 Email: bob@sellwoodplanning.com

**Sellwood
Planning**

Chartered Town Planners
Chartered Surveyors

No : 24940 / 24714

Forest Heath District Council

Single Issue Review Public Examination

Matter 5 “Deliverability (the housing trajectory, infrastructure and viability)”

Submitted by Sellwood Planning

on behalf of

The Earl of Derby

September 2017

Regulated by RICS

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Directors: R M Sellwood BA. Dip. TP. MRTPI. FRICS, M P Sellwood

1.0 Introduction

- 1.1 This response has been prepared on behalf of Lord Derby who is the freeholder of the Hatchfield Farm site which was previously proposed for 400 homes, a Primary School and a minimum of 5 hectares of employment land under Policy N1(c) of the Site Allocation Local Plan Preferred Options (April 2016). This proposal was assessed in the corresponding SA prepared by AECOM and found to be an appropriate site in the context of the spatial strategy in the adopted Core Strategy (May 2010).
- 1.2 The site was deleted from the pre-submission Single Issue Review (SIR) in January 2017 following the Secretary of State's refusal of an application for 400 homes in August 2016. Since then, High Court has quashed the Secretary of State's decision but not the Inspectors Report recommending approval. The Newmarket Horsemen's Group (NHG) sought leave to challenge this decision in the Court of Appeal, but leave was refused in August 2017. There is no further right of appeal.
- 1.3 The Inspectors have correctly identified the resulting low housing provision in Newmarket and the robustness of the SA as key issues to be examined.

2.0 (Q 5.1) "Appendix C of the Single Issue Review document sets out the housing trajectory. Is the trajectory a reasonable and realistic projection of housing delivery?"

- 2.1 It would be expected that the housing trajectory at Appendix C of the SIR would be derived from the latest five year housing land supply assessment document. However, the figures do not match up regardless of whether the December 2016 or July 2017 HLA reports are used. As an example, in 2020 / 2021 the trajectory anticipates 533 completions. However, the December 2016 HLA document anticipates 500 completions and the July document (CD : D8) suggests 783. This suggests that either the trajectory is underestimating completions in the first five years (2017 – 22) or the five year land assessment is being over optimistic. In this regard, 783 completions is a significant uplift in completions compared to any year since at least 2001.

- 2.2 Looking at the same issue over the whole five year period 2017 to 2022, the discrepancy continues. The trajectory shows 2,463 completions and the July 2017 HLA report expects 2,924 completions, a difference of 461 dwellings.

Comparative Dwelling Completions 2017 - 2022			
	Trajectory	HLA	Difference
2017 / 18	409	409	0
2018 / 19	437	432	-5
2019 / 20	497	673	+176
2020 / 21	533	783	+250
2021 / 22	587	627	+40
Total	2463	2924	+461

- 2.3 The table above shows how the trajectory and HLA completions start off reasonably close before widely diverging from 2019 – 20. Either the trajectory should be amended to reflect the HLA completions in CD : D8 or the assumptions underlying the trajectory should be imported into the HLA figures. Depending on which approach is adopted by the Council, there are the following different implications for the SIR :

- if the HLA completions are inserted into the trajectory it shows that market demand is such that the housing provision should be increased. If this is not done, the housing provision will be largely built out by the mid 2020s
- if the trajectory is correct and the HLA figures are reduced, it confirms the concerns expressed under Matter 3 that the Council does not have a five year supply of available and deliverable sites.

3.0 (Q 5.2) “Is the level and distribution of housing based on a sound assessment of infrastructure requirements and their deliverability, including expected sources of funding? In particular:

a) What are the key infrastructure requirements for the successful delivery of the housing planned?

b) What reassurances are there that these elements can and will be delivered when and where they are needed?

c) Has the cost of these infrastructure elements been estimated, and funding sources identified?

d) Where, when and how will the additional school places and early education provision required as a result of the housing set out in Policy CS7 be delivered?''.

3.1 The SIR and SALP identify a number of infrastructure concerns in the Newmarket area. The three most prominent are

- a need for an improvement to the A14 / A142 junction
- improvements to horse crossings
- the need for additional primary school places.

3.2 The need for an improvement to the A14 / A142 junction was referred to in the 2015 Infrastructure Delivery Plan supporting the Preferred Options SIR and SALP. At paragraph 4.5 it stated :

“A14 / A142 junction (Newmarket) : The AECOM study identifies that provision of growth in this location will have a significant impact at this already congested junction and will have a the potential to extend queueing back on to the A14. Whilst sustainable transport initiatives will help to reduce both the proposed growth and existing traffic levels, physical improvements will also be required. Improvements could include signals to ease congestion. A longer term option may be to redesign the junction although this would come at a significantly higher cost”.

3.3 The current Hatchfield Farm application contains a proposal for the signalisation of the A14 / A142 junction and this has been agreed with Highways England. Full funding was included in the S106 package and in his decision letter the Secretary of State states:

“He agrees with the Inspector at IR495 that the improvement to the A14 / A142 junction would result in wider benefits to those travelling on this part of

the road network in peak periods, and that the significant improvement to south bound queues along this part of Fordham Road, and the reduction in rat running along Snailwell Road carry significant weight in favour of the proposal” (DL18).

- 3.4 The deletion of the proposed Hatchfield Farm allocation has two consequences
- the developer funded improvement to the A14 / A142 junction disappears
 - as shown in the WSP Technical Note appended to the response to Matter 4, the natural attraction of Newmarket is such that there is a negligible difference in traffic levels at the A14 / A142 junction in 2031 with or without Hatchfield Farm.
- 3.5 The 2016 IDP supporting the submission SIR and SALP lists the key strategic infrastructure issues for the district. The first transport issue (p15) refers to the A14 / A142 junction but simply states that the Council will continue to work with partners **“to identify solutions and support early implementation / delivery”**. Page 34 of the same document looks at Newmarket and again identifies the A14 / A142 junction as a key issue, but puts forward no solution and no funding mechanism.
- 3.6 Turning to the need for improvements to horse crossings and horse walks in Newmarket, page 34 of the 2016 IDP simply notes **“further assessment required”**. Nothing is said about this issue in the ‘provision planned and / or funding sources’. In contrast, the current Hatchfield Farm application S106 includes a contribution to the improvement of the Rayes Lane horse crossing.
- 3.7 The Preferred Options SALP policy for Hatchfield Farm (Policy N1(c)) proposed that the site should provide 400 homes, a 1.5 ha primary school site and a minimum of 5 hectares of employment. The current planning application for Hatchfield Farm, which the Council resolved to approve in July 2014, includes 400 homes and a primary school reservation. With the deletion of Hatchfield Farm, the IDP proposes to address the shortage of primary school places by the expansion of existing schools. However, the expansion of Laureate School is dependent on land acquisition and overcoming congestion issues (p36).

3.8 By deleting Hatchfield Farm from the SIR / SALP, not only are new homes lost to Newmarket, but none of the other pre-submission allocations will provide a new primary school or fund the A14 / A142 junction improvement. There is also no policy requiring the proposed allocations to contribute to the improvements of horse crossings and horse walks. This is a further indication that the Council's decision to drop Hatchfield Farm was an ill judged and hasty reaction to the now quashed Secretary of State's decision which failed to consider how the Secretary of State's concerns could be mitigated thus allowing Hatchfield Farm to both proceed and to deliver much needed structural infrastructure in Newmarket.

4.0 **(Q 5.3) "Is the housing set out in Policy CS7 financially viable? In particular:**
a) are the viability assessments in the Economic Viability Assessment (2016) [B15] sufficiently robust and are they based on reasonable assumptions?
b) do the viability assessments adequately reflect the nature and circumstances of the proposed allocations?
c) has the cost of the full range of expected requirements on new housing been taken into account, including those arising through policies in the adopted Core Strategy (for example, in relation to affordable housing)?
d) does the evidence demonstrate that such costs would not threaten the delivery of the housing planned for?"

4.1 The only comment to be made in response to this question is to advise the Inspectors that the current Hatchfield Farm application S106 agreement undertakes to deliver the Council's full affordable housing requirement.