

# **SITE ALLOCATIONS LOCAL PLAN**

## **FOREST HEATH DISTRICT COUNCIL**

### **MATTER 4:**

### **THE SPATIAL DISTRIBUTION OF HOUSING IN THE MARKET TOWNS**

**ON BEHALF OF: NEWMARKET HORSEMEN'S GROUP**

**WORD COUNT (EXCLUDING ANY APPENDICES): 2,191**

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## **FOREWORD**

1. This matter statement was prepared prior to the receipt of the letter from the Inspectors (dated 4 October 2017) dealing with the SIR, which highlighted soundness issues with that document.
2. The soundness issues relate to two matters: the balance of housing between Market Towns and Key Service Centres and the consistency of this with the Core Strategy, and; the absence of evidence on regarding traffic movements through Newmarket and the consequential impact on horse movements (a key issue for the NHG).
3. It is now for the Council to decide what it is to do in light of these concerns and in the meantime, the SALP hearings are to continue. This statement has therefore been prepared on the basis of the information currently available.

**1. ISSUE 4.1**

**1.1 Are the detailed requirements for each of the sites clear and justified?  
Are all the allocated sites deliverable?**

1.1.1 The NHG's concern relates to the implication of development on the HRI in Newmarket.

1.1.2 We heard at the SIR hearings from an objector that the distribution of development across the district will lead to a 28% increase in traffic in Newmarket. This was not disputed by the Council and presents a significant concern to the NHG in terms of the inherent implication for the perception of adverse impact on the safety of horse movements.

1.1.3 To assist the Inspector in understanding the transport concerns of the NHG, a statement prepared by COTTEE Transport Planning is attached at Appendix 1 to this statement.

1.1.4 The Council confirmed at the SIR hearing that the transport work for the SIR and the SALP did not assess the impact of increased traffic on horse movements in the town. The County Council acknowledged that there is an existing safety issue for horse movements in the town that is currently the subject of a joint review with the Jockey Club and an emerging mitigation strategy and the allocation of some funding. The County also confirmed that no such work had been carried out or is underway to assess the implications arising from the growth planned in the SIR and the SALP and as such no funding is in place. The District Council considered that this would be appropriately addressed by legal obligation, which the NHG considers to be a fundamental flaw in the approach of the SIR and SALP.

1.1.5 All of this raises significant concerns for the NHG in terms of the potential implications for the HRI and the perception of harm and contradict the Council's acknowledgement at paragraph 5.6.8 that "there is a need to carefully manage the movements of vehicles and horses within the town" when considering the opportunities and constraints to future development.

1.1.6 It also contradicts the statement at paragraph 5.6.16 that "Infrastructure needed to deliver development in Newmarket includes ... mitigation schemes designed to lessen the impact of additional traffic on horse movements may be required depending on the location and scale of development". As the work

has not been done to identify the impacts of the mitigation schemes it is not possible to confirm which sites must deliver such works or the cost of doing so. It is noticeable that the requirement to deliver such works or even consider the need for them does not feature in policy SA6. It is not reasonable or appropriate to leave this to the implementation of policy DM48 of the Joint Development Management DPD as it raises the potential to impact on the deliverability of the sites identified.

1.1.7 In the absence of this detailed work it is not possible to identify the works required or the costs involved in delivering these works. It is important to remember that the County Council confirmed that such works at the extreme could involve bridges and underpasses. Such works – if deemed necessary – would be very expensive to deliver with no identified source of funding at this stage.

1.1.8 Furthermore, the Council acknowledged at the SIR hearing that sites outside of Newmarket do give rise to the potential for increased traffic in the town and therefore impact on the HRI. As such, the Council confirmed that such schemes would be expected to contribute to improvements to horse walks and crossings and that this would be secured by legal agreement. Yet the SALP makes no reference to the potential for this outside of Newmarket and paragraph 5.6.16 indicates that the need for such work would be confined to sites in Newmarket.

1.1.9 The purpose of a site allocation document is to identify the expectations for individual sites including any associated mitigation measures that may influence the deliverability of the site. This has not been adequately addressed in the SALP in the context of HRI impact and as such the deliverability of the Plan has not been adequately tested.

## **2. ISSUE 4.5: Mildenhall**

### **2.1 In terms of Mildenhall and specifically the closure of RAF Mildenhall – has this issue been adequately addressed by the text at para 4.8. If not why not?**

2.1.1 No. The NHG has consistently raised concerns that the implications of the closure of RAF Mildenhall have not been adequately considered. It is too simplistic to suggest that it is a matter for consideration in the future as the closure of the base will not take place immediately.

2.1.2 The NHG covered this in the representations to Matter 4, Issue 4.1. The closure of RAF Mildenhall will result in the net loss of 2,000 service personnel – even after the planned expansion at Lakenheath is taken into account. The Council commissioned a report by SQW in an attempt to understand the impact of the USAF on the local area<sup>1</sup>. This looked at a range of issues and confirmed the following:

- RAF Mildenhall is home to refuelling and special operations and maintenance squadrons with a high propensity of military personnel to live off-base.
- RAF Lakenheath is home to fighter squadrons (which will continue after expansion) - staff here have a greater propensity to live on base given the nature of their activities. This is evidenced by the fact that the base has almost nine times as much housing on base as at RAF Mildenhall (see para 2.4 of the SQW report).
- Both air bases have significant military and non-military assets – see figure 2-4 of the report for details.
- USAF personnel receive generous accommodation allowances that distort the local rental market (see section 5 of the SQW report).
- The closure of RAF Mildenhall and the net loss of military personnel will return existing off-base housing to the open market with the potential for on-base housing (currently 109 properties) to be released to the open market in advance of redevelopment.
- “The changing USVF presence will have important housing and demographic effects, with implications for local services: a significant number of houses will become available off-base following job losses at RAF Mildenhall (particularly those previously rented to US staff) with implications particularly for local schools in terms of increased demand from in-moving families who will educate their children at UK schools” (page v of Executive Summary of SQW report).

2.1.3 The closure of RAF Mildenhall has significant implications for plan-making in this area both in terms of the impact on the housing market and the need to plan for infrastructure. USAF staff have access to US infrastructure within the air bases, which assists in relieving pressure on off-base infrastructure. The re-occupation of off-base accommodation by non-military staff means that this new population will look to existing infrastructure to fulfil their needs. The extent to which this can be accommodated has not been adequately

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[https://www.westsuffolk.gov.uk/Business/RAF\\_Lakenheath\\_and\\_Mildenhall/upload/USAF\\_EimpactsFinalreport160303.PDF](https://www.westsuffolk.gov.uk/Business/RAF_Lakenheath_and_Mildenhall/upload/USAF_EimpactsFinalreport160303.PDF)

- investigated and as such the implications for planned growth in the SALP has not been tested.
- 2.1.4 In response to Matter 2, the NHG has commented on the absence of consideration of RAF Mildenhall as a reasonable alternative towards the end of the plan period. RAF Mildenhall will be vacated during the lifetime of the SALP and the Council has already consulted the public about the development potential of this site under a separate exercise (see [http://www.westsuffolk.gov.uk/Business/RAF\\_Lakenheath\\_and\\_Mildenhall/index.cfm](http://www.westsuffolk.gov.uk/Business/RAF_Lakenheath_and_Mildenhall/index.cfm) for details). The NHG accept that the whole site may not be deliverable within the plan period but it disagrees with the Council's position that none of the site will be available. Given the fact that the site is owned by the MoD and the Government's commitment to releasing public land to meet housing needs, there is every reason to assume that the land will be made available soon after it is vacated. The Council's response to the availability of this significant brownfield asset is to leave it until the joint plan review early next year. This is an illogical position to take as it has direct consequences about the decisions to be taken for the SALP.
- 2.1.5 The NHG maintain the view that the closure of the base during the lifetime of the plan means that it was therefore appropriate for the evidence base to fully investigate the implications and account for these in the SALP. This has not been done, which is a significant soundness issue for this plan.

### **3. ISSUE 4.18: Newmarket – site SA6 (a)**

#### **3.1 How has the HRI been taken account of in terms of this proposed allocation – where is the specific evidence on this issue?**

- 3.1.1 The NHG considers that the implications for the HRI and beyond simply the loss of a site. It is necessary to consider the impact of the redevelopment of the site on wider aspects of the HRI including the implications for horse movements around the town.
- 3.1.2 As mentioned under issue 4.1 above, we heard at the SIR hearing that the implication of traffic impact on horse movements has not be carried by the Council's transport consultant (Aecom) in its work for the SIR and the SALP. We also heard that the County Council agreed that there was an existing safety issue with horse movements in the town and that this was the subject of an ongoing study but that no study was underway to consider safety

implications arising from the SALP sites – both inside or outside of Newmarket. The NHG has always maintained that the impact on horse movements has never been considered and it was helpful to this process to hear that confirmed by the Council at the SIR hearings. The NHG therefore requests that the Inspector take this into consideration when addressing this issue.

3.1.3 The NHG further add that in the absence of any detailed assessment of the implications or identification of the measures needed to mitigate impact, it is not possible to conclude that the site is a viable site for delivery.

#### **4. ISSUE 4.19 and 4.20: Newmarket – site SA6(b)**

##### **4.1 Should the capacity for the site be indicated at this stage?**

4.1.1 Yes – this is essential in order to understand the impact of the site on the HRI, the necessary mitigation arising and the extent to which the site can be considered to be viable.

##### **4.2 Is the site deliverable?**

4.2.1 In the absence of the work relating to horse movements in the town and the unknown scale of mitigation measures it is not possible to conclude that this site is deliverable as the proportionate share of the costs cannot be calculated.

#### **5. Conclusions on Matter 4**

5.1.1 The NHG considers that the issues it has raised in relation to this matter have direct and adverse impact on the extent to which the plan can be judged to be sound. It has not been planned positively for the development and infrastructure required in the area – which the NPPF lists as a crucial requirement at paragraph 157. The strategy cannot be said to be justified as, in the case of HRI impact, that strategy has not been developed or planned for. The deliverability of the individual sites cannot be demonstrated as it does not adequately identify all infrastructure requirements or the costs associated with delivering these.

5.1.2 To rectify the NHG concerns the plan should either be found unsound or suspended so that the work that has been identified as missing can be carried out and assessed.

**Appendix 1: Statement prepared by COTTEE Transport Planning**

## Forest Heath District Council Examination of the Site Allocations Local Plan (SALP)

### Representations on behalf of the Newmarket Horsemen's Group (NHG) – October 2017

#### Introduction

COTTEE Transport Planning (CTP) are instructed by NHG to make representations on Transport related Matters and Issues associated with the SALP.

A material consideration is the recent letter dated 4 October 2017 following the Examination of the Single Issue Review (SIR) of Core Strategy Policy CS7. The Inspectors have raised two concerns which could affect the soundness of the SIR as drafted. One of the concerns relates to the effect of traffic arising from the proposed housing growth on existing horse crossings and horse walks in Newmarket. The Inspectors have cited safety and the perception of safety in relation to horses, their riders and other highway users; and that there is an evidential shortcoming in terms of the forecast increase in traffic movements in Newmarket. Forest Heath District Council (FHDC) have been invited to consider how the issues could be addressed through the Plan making process and it has been acknowledged that further work is likely to be needed.

The doubt raised over the soundness of the SIR inevitably raises consequences for the soundness of the SALP. However, this document has been prepared to consider the SALP as drafted and focuses principally on Matter 2.

The issue of traffic impact in Newmarket has been the subject of detailed consideration through the Hatchfield Farm inquiries. It is the work at this site that the Council has used to inform its viability work for the SALP. This document therefore addresses the transport aspects of the Hatchfield Farm site in light of the latest Aecom work to assist in explaining the issues relating to Newmarket in more detail.

#### [Matter 2 – Basis for the Plan](#)

**Issue 2.4 raises the following issues – CTP representations are shown in red text.**

#### [How have the transportation and infrastructure requirements of the site allocations been taken into account?](#)

1. As regards Newmarket, FHDC say that the Aecom studies provide the cumulative impact evidence, however, the NHG disagree because the studies are inconclusive. This is evidenced from the following extracts from the Aecom report (bold text applied by CTP). Furthermore, and of great concern to the NHG, the Aecom studies have not considered the impact of their projected 28% growth in traffic on thoroughbred racehorses, their riders, other highway users; and other HRI related movement in Newmarket such as trainers and vets needing to access all parts of the town during peak periods to attend to horses generally and in emergency situations.

2. **Aecom's August 2016 report paragraph 9.4.1 states:** *'Whilst some key strategic improvements are required, particularly at Junctions 37, 38 on the A14 and the A11 / A1101 Mildenhall Road / A1065 Brandon Road / A1101 Bury Road (A11 Fiveways) further detailed studies are needed to confirm the schemes for pricing purposes.'*
3. **Paragraph 9.4.2 states:** *'The report provides an indication of the cumulative traffic impacts to be expected, however for the purposes of designing any mitigation, a more refined approach would be needed using the strategic multimodal transport model currently being developed by SCC.'*
4. **Table 9.1 Junction A14 / Fordham Road refers to the following:** *'An enhanced signalised option with two left-turning lanes from the A14 off-slip, two southbound lanes on Fordham Road, and the right-turn from Fordham Road to the A14 EB on-slip incorporated into the signals with an early cut off and indicative arrow phase. These additional enhancements would require four lanes (two northbound and two southbound to be provided on the Fordham Road Bridge over the A14), and the realignment of the A14 WB on-slip. A detailed feasibility assessment would be required to consider options to fully accommodate the future scenario flows, likely to include the widening of the A14 bridge.'* Any further study should also include the whole section of Fordham Road between Windmill Hill to the north and Studland Park Ave/ Fordham Road roundabout to the south in order to take account of the interaction between junctions. This could take the form of a microsimulation assessment.
5. It is clear that further studies are required before it may be concluded that transport requirements have been taken into account.

**Has it been demonstrated that there is a reasonable prospect that planned infrastructure will be delivered within the timeframe envisaged?**

6. NHG consider that no evidence has been provided to demonstrate the necessary infrastructure delivery. In particular there has been no study of horse movements, or the interaction with the 28% growth in traffic identified by Aecom in their cumulative impact studies.
7. It is apparent that further studies are required before it may be concluded that the necessary transport infrastructure will be delivered.

**Will this delivery of infrastructure be sufficient to support the anticipated rate of development?**

8. Evidence has yet to be produced. As indicated earlier, Aecom have confirmed that further studies are needed at various location in Newmarket, and particularly at the A14 junction with Fordham Road where bridge widening across the A14 is likely to be required.
9. At paragraph 9.3.2 Aecom state that: *'A key consideration is that the continued growth of traffic at current mode share levels is unsustainable. In order to facilitate the proposed level of growth a holistic approach to transport is required and there is significant opportunity to support more sustainable travel patterns in the future. The potential to provide additional highway capacity is limited and will be very costly.'*

10. Aecom's Paragraph 9.4.1 concludes: '*.....further detailed studies are needed to confirm the schemes for pricing purposes.*'
11. It is concluded there is currently no evidence that the necessary transport infrastructure will be delivered.

#### **Issue 2.5 Viability Assessment – CTP representations are shown in red text.**

1. At the SIR it was confirmed that FHDC's viability assessment applied £500 per dwelling as a potential S106 contribution towards horse walk infrastructure. FHDC stated that this has been based on the cost of one horse crossing at Rayes Lane from the Hatchfield Farm Inquiry i.e. £200k divided by 400 units = £500 per unit. FHDC have applied this cost in the viability assessment to developments of 150+ only and to developments in Newmarket only.
2. The NHG are concerned that the payment only applies at 150+ units; at sites only within Newmarket; and that the calculation is based on one development. There is no logic to the way FHDC have considered the horse crossing issues in the viability assessment.
3. The NHG's position is that: there is already a problem with the number of traffic movements at horse crossings; these problems will increase with more traffic (predicted by Aecom to be circa 30% but could be more bearing in mind the low trip rates they have adopted); there has been no methodical assessment of these issues and there is no logic to the way in which the viability assessment has been undertaken especially when there are 17 horse crossings in Newmarket and a network of horse walks linking them.
4. The ongoing study being undertaken by NHG and Suffolk County Council is to address the existing safety issues with current levels of traffic. The concern of the NHG, confirmed at the SIR hearing by Aecom, is that there is no study underway to consider safety implications arising from the SALP sites, either within Newmarket or outside.

#### **Hatchfield Farm**

An independent study by Aecom for Forest Heath District Council (FHDC) dated August 2016 entitled: FHDC SAP Cumulative Impact Study including 400 units at Hatchfield Farm raised a number of points and queries that relate directly to the Hatchfield Farm site:

1. The Aecom work has highlighted an increase in traffic of around 30% on Fordham Road up to 2031 as part of the Local Plan housing allocation. However, FHDC have undertaken no methodical assessment of the risks associated with such an increase on horses, their riders and other highway users (for example, school children moving to and from the two schools immediately adjacent to Rayes Lane).

2. FHDC have said they are aware of the problems but have identified no solutions. It was agreed at the Hatchfield Farm inquiry that the 400 units scheme at Hatchfield Farm would add 5% traffic to the Rayes Lane crossing. As a result they have put forward various options commencing with a simple crossing enhancement at the Inquiry. WSP then put forward a 'COTTEE no signals' option at the SIR hearing (paragraph 4.4 – 4.8 Sellwood Matter 4); but during the hearing Hatchfield Farm seemingly set aside that option and said they would fund a signalised horse crossing. However, as regards the SIR and SALP it is the wider context that requires to be examined not just Rayes Lane. There are 17 main horse crossings in Newmarket and a network of associated horse walks; the SIR and SALP needs to consider the impact of a 30% increase in traffic on the whole network.
3. Another major concern of the NHG is the reference in the Aecom report to Fordham Road being highly likely to experience accidents (paragraph 4.8.11); and accidents occurring along Fordham Road are more likely to result in a death or serious injury (paragraph 4.8.12).
4. Since Fordham Road over its entire length is the focus for all of the Hatchfield Farm traffic a route that is considered by FHDC's consultant as 'highly likely to experience accidents' and 'accidents are more likely to result in death or serious injury' casts serious doubt over the appropriateness of adding more traffic to this route – be it at Hatchfield Farm or anywhere else on this road.
5. Aecom confirm the signalised scheme proposed for the A14 junction by Hatchfield Farm exceeds capacity in the future scenarios (paragraph 8.2.9). This despite Aecom using lower trip rates in the PM peak hour than WSP for Hatchfield Farm in their analysis.
6. The use of appropriate PM peak trip rates in the Aecom analysis would further cast doubt on the ability of Hatchfield Farm to be accommodated on the highway network at the A14 junction.
7. There are a number of trip rate scenarios included in the original Hatchfield Farm work two of which are referred to below. In both cases the PM peak analysis undertaken by Aecom uses trip rates significantly less than the WSP trip rates except for the AM peak 'travel plan rate', which is similar. In the AM peak the trip rate used by WSP is 29% higher for the 85<sup>th</sup> percentile rate; for the PM peak WSP trip rates are between 36% and 75% higher. This strongly suggests that the Aecom trip rates are significantly underestimating the traffic impact, relative to the figures WSP agreed at the Inquiry. Accordingly, Aecom should be required to undertake revised traffic analysis for all junctions in Newmarket with the higher rates, at least as a sensitivity test. Using higher rates would lead to a greater impact than the 30% they have considered to date.

Aecom August 2016:

0.52 / dwelling AM peak

0.44 / dwelling PM peak

WSP inquiry evidence pp4.5.2 – Travel Plan rates

0.50 / dwelling AM peak

0.60 / dwelling PM peak

WSP inquiry evidence pp4.5.2 – 85th percentile rates

0.67 / dwelling AM peak

0.77 / dwelling PM peak

8. It is worthy note and indeed a note of caution that the Hatchfield Farm baseline traffic surveys undertaken in 2012 are now out of date and their conclusions / agreements with Highways England are considered superseded by the Aecom study. The accepted 'shelf life' for survey data is 3 years so it is expected that Hatchfield Farm would be required to repeat their analysis; and consider the conclusions of the Aecom findings as regards the inadequacies of their design. Aecom conclude that further analysis is required for the A14 junction and this should involve consideration of enhanced signal schemes and widening of the bridge over the A14 (paragraphs 8.2.16 and 8.2.20).
9. Since the A14 junction already has safety and capacity issues these comprehensive improvements will need to complete before any further major development can take place. The implementation of a scheme wholly capable of accommodating the FHDC allocations is essential at this location.
10. It follows that a development of Hatchfield Farm would necessitate both the A14 junction improvements and provision of the horse crossing / horse walk infrastructure on Fordham Road prior to first occupation. This requirement is justified because FHDC's consultants have stated Fordham Road is a route which is highly likely to experience accidents. Accordingly, there are risks to horses and their riders now and these risks would increase with increased traffic as demonstrated with evidence submitted at the 2015 Inquiry. These safety issues and the perception of safety in relation horses, riders and other road users should be fully examined and schemes implemented.
11. Sustainability – at the Inquiry WSP asserted that Hatchfield Farm related well to Newmarket town centre in terms of walking. However, "Providing for Journeys on Foot" Table 3.2 cites 800m as the preferred maximum walk distance to a town centre. The centre of the Hatchfield Farm site is around 2.5km to 3km (or a 30 to 40 minute walk) from the town centre; therefore it is likely the majority of trips will be car based. In terms of walking to the town centre Hatchfield Farm cannot reasonably be considered to represent a sustainable location.