

SITE ALLOCATIONS LOCAL PLAN FOREST HEATH DISTRICT COUNCIL

MATTERS 5 & 6:

HOUSING IN THE KEY SERVICE CENTRES

HOUSING IN PRIMARY VILLAGES

ON BEHALF OF: NEWMARKET HORSEMEN'S GROUP

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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. Introduction

1.1.1 The NHG comments on Issue 5.1 for Matter 5 and Issue 6.1 for Matter 6 are identical and relate to the issues raised in respect of Matters 2 and 4. The Inspector is requested to refer back to these statements for more detailed debate.

1.1.2 For the sake of brevity and in light of the similarity of the comments, the NHG has prepared this joint statement to cover Matters 5 and 6.

2. ISSUES 5.1 & 6.1: all allocations

2.1 Are the criteria in the allocations policies necessary, relevant and deliverable? Are the detailed requirements for each of the sites clear and justified? Are all the allocated sites deliverable?

2.1.1 The NHG do not consider that these questions can be positively answered for any of these sites. As discussed in the NHG's Matter 4 statement, the SIR hearings confirmed that the impact of the proposed development sites on horse movements has not been assessed by the Council. The work to identify mitigation measures to address existing safety issues is underway but not complete and the work to identify mitigation measures for future development has not even started.

2.1.2 In the absence of this work it is not possible to identify the infrastructure improvements required, the extent to which improvements are deliverable, the cost of such improvements or the source of funding. It is also not possible to identify which schemes to contribute towards such works and/or whether individual sites need to provide any land to accommodate the improvement works.

2.1.3 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 the potential for 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. There is therefore no indication to a developer outside of

- Newmarket that it may be necessary to contribute to an undefined level of mitigation works in Newmarket to reduce impact on the HRI.
- 2.1.4 In the absence of the relevant information on impact and mitigation measures, it is not possible to appraise the viability of individual sites or form any view on the deliverability of such sites.
- 2.1.5 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.

3. Conclusions on Matters 5 & 6

- 3.1.1 The NHG considers that the issues it has raised in relation to these matters 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.
- 3.1.2 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.