

# **SITE ALLOCATIONS LOCAL PLAN FOREST HEATH DISTRICT COUNCIL**

## **MATTER 1: LEGAL REQUIREMENTS**

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

**WORD COUNT (EXCLUDING ANY APPENDICES): 698**

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## **FOREWORD**

1. This matter statement was prepared prior to the recent 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 1.2 – Compliance with the Core Strategy**

**1.1 Does the SALP appropriately reflect the overall vision and strategic framework of the CS?**

1.1.1 Despite the concerns that the NHG has raised on other matters, the answer to this question is yes. The level of housing delivered at the Market Towns and Key Service Centres is consistent with Objective H1 of the Core Strategy.

1.1.2 The NHG is aware that the Inspectors for the SIR have raised concerns about this and awaits the response of the Council to this point.

1.1.3 The NHG has previously recommended to the Council that further consideration be given to the development potential at both RAF Mildenhall and Brandon. Following the Inspectors' comments, the NHG considers that these locations should be reconsidered as part of this exercise.

**2. ISSUE 1.6**

**2.1 Has the formulation of the SALP been based on a sound process of sustainability appraisal and testing of reasonable alternatives, and is the sustainability appraisal adequate? Does the SA consider all likely significant effects on the environment, together with economic and social factors? Is it clear how the SA has influenced the final plan?**

2.1.1 The NHG has consistently raised concerns that the impact of traffic movement on the HRI has not been properly assessed. That was confirmed at the SIR hearings by the Council. In the absence of adequate assessment of the traffic and transport implications of the planned development it is not possible for the SA to confidently address these issues when assessing the options.

2.1.2 In the absence of such work, the threat to the horse-racing industry cannot be assessed and - as a major contributor to the local economy - the economic consequences cannot be taken into account.

2.1.3 Appendix III of the SA provides the Aecom's response to these issues, which were raised at the consultation process. The responses do not address the issues raised. Furthermore, they rely on the cumulative transport work carried out by Aecom, which was confirmed at the SIR hearing as never having taken the impact on horse movements into account.

### **3. Conclusions on Matter 1**

- 3.1.1 The NHG considers that the issues it has raised in relation to Issue 1.6 above have direct and adverse impact on the extent to which the plan can be judged to be sound. The SA process has been undertaken without appropriate understanding on the impact of development on the HRI and therefore cannot adequately assess the transport or economic impacts of each site.
- 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 as part of the SA process.