1. Introduction

1.1 This representation concerns Suffolk County Council’s comments on highways and transport issues, as relevant to the questions identified under Matter 4. These relate to questions 4.4d) and 4.4e).

2. Question 4

4.4 Housing growth at both Newmarket and Brandon is quite low relative to other settlements. Both are Market Towns, in the ‘top tier’ of the settlement hierarchy. Newmarket is the district’s largest settlement with a wide range of services and facilities, and is recognised as one of its most sustainable settlements, if not the most

[...]

4.4 d) What evidence is there to demonstrate that greater housing growth in Newmarket would lead to more traffic in town than the proposed distribution of new housing?

2.1 The key transport evidence underpinning the Single Issue Review was produced by consultants AECOM on behalf of the County and District Councils. The ‘Forest Heath District Council Site Allocation Plan Cumulative Impact Study (August 2016)’ (Ref: B18) considers the cumulative impacts of development proposed in the preferred options version of the Single Issue Review and Site Allocations documents.

2.2 Newmarket is given consideration as a market town in the Forest Heath settlement hierarchy. This (August 2016) study considers the accessibility of each settlement, distributes additional traffic on to the network, estimates impacts on the capacity of key junctions and identifies potential mitigation schemes. As set out in paragraph 2.2.1 of the study, it considers the impact of 654 dwellings, 5ha employment land, a 1.5ha school site and 5,597m² B8 use (permitted St Leger site).

2.3 An Addendum (‘Forest Heath District Council Site Allocation Plan Cumulative Impact Study – Addendum’, Ref: B17) was published in October 2016. This
acts as an update to the August study, by discounting the Hatchfield Farm site from the assessment following the Secretary of State’s decision. Along with other consequential amendments, the October 2016 addendum tests 333 fewer dwellings in Newmarket than the August study.

2.4 Paragraph 1.6.2 of the October study summarises the impact of the change in number of dwellings proposed in Newmarket. It states that the reduction in the housing allocation to Newmarket results in 'a net reduction in traffic flows in the future year scenarios at all junctions' compared to greater housing growth.

4.4 e) Could the impacts of increased traffic on the horse racing industry be addressed, for example through the provision of new or enhanced horse walks?

2.5 As evidenced by the detailed consideration which has been given to the Hatchfield Farm applications, it is possible to mitigate the severe impacts of additional traffic on the operation of the highway network in Newmarket, and horse crossings and walks are part of this unique highway network. This is distinct from consideration of the perception of highway impacts, which the racing industry has consistently raised as a concern and have also been considered through the determination of the Hatchfield Farm applications.

2.6 At the first Hatchfield Farm Inquiry in 2011, the County Council agreed a package of mitigation with the appellant such that the highway impact of 1,200 dwellings was acceptable. This included consideration of race horses as highway users. The Inspector concluded that ‘improvements would provide sufficient mitigation for the increased traffic flow resulting from the Appeal Proposals in order to avoid any undue impact on highway safety.’ (paragraph 12.4.18, Ref: D3). The Secretary of State concurred with this assessment, stating that ‘the overall effect [of the proposal] would be adequately mitigated in highway safety terms’ (paragraph 14, Ref: D4).

2.7 At the second Hatchfield Farm Inquiry in 2015, the County Council again agreed a package of mitigation with the applicant. The Inspector reached the same conclusion as at the first Inquiry, that ‘it is not considered that the application development would result in an unacceptable increase in congestion or harm to highway safety. The residual transport impact of the development would not be severe’ (paragraph 369, Ref: B19). Detailed consideration was given to the Rayes Lane horse crossing and the Inspector concluded that it was possible to deliver improvements at this location which ‘would provide an improvement to the network and a safety benefit’ (paragraph 391, Ref: B19).

2.8 The Secretary of State, in his decision letter refusing the latter Hatchfield Farm application, stated that the nature of race horse behaviour is such that ‘material safety benefits which the Inspector cites are not certain’ (paragraph 19, Ref: B19). In coming to his overarching decision, the Secretary of State drew a
distinction between the highway impacts of the proposal and the perception of
the highway impacts, noting ‘that there is a substantial risk that the potential
adverse consequences of increased traffic at the Rayes Lane horse crossing
will create perceptions among owners and others in the industry of a more
negative context for the industry in Newmarket. The Secretary of State
considers that this would threaten the long-term viability of the horse racing
industry’ (paragraph 21).

2.9 The County Council is working with the racing industry and other local partners
in Newmarket to identify practical measures which improve horse crossings
and walks. A brief summary of this work was provided by Forest Heath in its
response to the Inspectors’ letter of 2 June 2017 (Q. 4).
Appendix – Transport Evidence Timeline

November 2009 – Forest Heath LDF Transport Impacts by AECOM (Ref: B59)

This assessed the scale and distribution of development proposed through the original Policy CS7. It tested that distribution and its impacts based on evidence available at the time, including the 2001 Census. It considered the impact of 1,640 additional dwellings in Newmarket between 2010 and 2031 – a higher level of growth than in the proposed SIR – but drawing conclusions based on older data than the more recent studies.

May 2016 – AECOM Technical Note (Ref: B22)

Updated the 2009 study’s assessment of highway impacts, although it did not carry out detailed highway modelling. This was an interim paper which was superseded by the studies described below.

August 2016 – Forest Heath District Council Site Allocation Plan Cumulative Impact Study by AECOM (Ref: B18)

Commissioned jointly by Forest Heath District Council and Suffolk County Council, this assessment carried out detailed modelling of the proposals in Forest Heath’s preferred options paper. It identifies, at a high level, the highway mitigation measures which will be required in order to deliver the level of growth identified at preferred options stage.

October 2016 – Forest Heath Site Allocation Plan Cumulative Impact Study (Transport) – Addendum, by AECOM (Ref: B17)

This paper updated the August study in light of the Secretary of State’s decision to refuse the proposal for 400 dwellings at Hatchfield Farm. It considers the scale and distribution of growth proposed by the submission version of the Single Issue Review.