

From: The Trustees of the EG Lambton 1974 Settlement.

To: Annette Feeney, Programme Officer, C/o Strategic Planning, Forest Heath District Council, West Suffolk House, Western Way, Bury St Edmunds, Suffolk IP33 3YU

Statement to the Examination of the Site Allocations Local Plan.

This written statement relates to Matter 2 of the Examination –Basis for the Plan and is in addition to representation ID: 24737 made during the Consultation on the Submission Stage of the Site Allocations Local Plan in March 2017.

The letter from the Inspectors of the SIR dated 4<sup>th</sup> October adds weight to our earlier representation that Policy SA6 is not justified, because the reasonable alternative; which is to allocate additional sites in Newmarket to insure against the possibility of non-delivery of allocated sites has not been considered.

The need to insure against the possibility of non-delivery of allocated sites in Newmarket is essential, due to the level of housing distribution allocated to Newmarket within Policy CS7, which is already significantly below what it would be as directed by Policy CS1, in line with its position as the largest and most sustainable settlement in the district. The Inspector's letter dated 4<sup>th</sup> October draws attention to this. The sensitivity of the distribution of housing between market towns and key service centres, to the removal of allocated sites in Newmarket, is clearly demonstrated by impact of the removal of Site N1(c) from the list of allocated sites at the Preferred Option Stage.

The Council's position in response to the Inspectors question 3(a) in the Schedule of Matters for the SIR of Policy CS7, that *"There is a lack of suitable, available and achievable sites on unconstrained land in Newmarket. The only identified site that is less constrained is to the north east of Newmarket at Hatchfield Farm..."*, is incorrect and our written statement to the EIP of the SIR and Representation ID: 24736 to the Preferred Option stage of the SIR refers. Site N18 is not constrained in the manner set out in para 5.6.8 of the Submission Site Allocations Local Plan, nor in the manner set out in the Council's response to the Inspectors questions 3 (a). N18 could be allocated.

Detailed submissions were made at the Preferred Options stage of the SALP in July 2016, to show how site N18 is capable of delivering around 200 residential units and is therefore capable of contributing an up to 32% increase in the overall housing allocation for Newmarket from the proposed level, with commensurate impact on the balance within the overall housing distribution in the district, between Market Towns and key service centres. For the reason set out above, Site N18 should be considered as a reasonable addition to the list of allocated sites in Newmarket.

The reasons given for the non-inclusion of Site N18 at the preferred options stage of the SALP were twofold: (1) that it had been allocated during the previous plan, but no acceptable scheme had come forward during the life of the

plan and therefore that the likelihood of it coming forward in the coming plan period is questioned and (2) that, located off the Fordham Road, development is likely to raise similar concerns to those recently upheld by the SSCLG for the development of Hatchfield Farm.

Reason 1 is not substantially correct. A Planning Application (see F/2011/0541/HYB), submitted in 2011 for a mixed use development of site N18 was refused solely on grounds contrary to Policy CS11. All other site specific issues, including Highways and Access, Flood Risk, Contaminations, Ecology, Noise, Existing Services, Archaeology and provision of replacement Sports Facilities were deemed to have been satisfactorily dealt with. A residential development on this site would not be refused because it is in conflict with Policy CS11.

Reason 2 is not proven and can be discounted in the light of the recent High Court Judgement. The site at 8 Ha, rather than 70Ha in the case of Hatchfield Farm, is unlikely to raise the same fears over large scale development. The same arguments, which have recently been comprehensively discounted, concerning the potential impact on the HRI of development of residential sites in Newmarket, must have materially less weight in the context of the relative scale of this site.

Site N18 was omitted from the SHLAA due to the potential loss of valuable open space. Our previous representation to the Submission stage ID: 24737 and detailed representations at the Preferred Option Stage of the SALP in July 2016 refers and sets out our case; (1) that the George Lambton Playing Fields are being significantly under-utilised at the present time in terms of providing valuable open space; (2) that usage continues to decline and; (3) that government priorities for the provision of outdoor recreational space have changed, requiring Local Authorities to look at the options as to how they can meet these new priorities. The omission of Site N18 from the list of allocated sites will significantly limit the Local Authority's ability to deliver on these new objectives.