

**Single Issue Review of Core Strategy Policy CS7 and the
Site Allocations Local Plan Examination**

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Mrs Marie Smith
Service Manager (Planning Strategy)
Forest Heath District Council

By email only

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Dear Mrs Smith

Examination of the Single Issue Review of Core Strategy Policy CS7

As you know, we have been appointed to examine the Single Issue Review of Core Strategy Policy CS7 ('the SIR'). We have now undertaken our initial review of the document and the supporting evidence. This letter sets out a number of matters on which we are seeking clarifications from the Council. It provides firstly some background context, then a number of specific questions.

Background

The Core Strategy's vision for the district says that development will be focused in the towns and key service centres. Small amounts of new development will occur within a number of the designated primary villages to support rural sustainability.

Settlement specific visions are also set out. Those relating to each of the district's three Market Towns provide some indication about housing growth. The vision for Newmarket says that most of the additional housing development will have taken place to help meet the needs of local people and businesses. For Mildenhall, the vision says that additional housing, including housing to meet the needs of local people will have been provided. Brandon's vision states that "*the market town will become increasingly self-sufficient, meeting the needs of the local community with residential and employment growth*". The visions for Lakenheath and Red Lodge, the two Key Service Centres, do not refer to housing growth, at least not in any explicit way.

The spatial objectives of the adopted Core Strategy include the following:

- Spatial Objective H1: Enough decent homes to meet the needs of Forest Heath's urban and rural community, in the most sustainable locations; and

- Spatial Objective T1: To ensure that new development is located where there are the best opportunities for sustainable travel and the least dependency on car travel.

Table 3 of the SIR gives the hierarchy of settlements set by Policy CS1 of the Core Strategy. Paragraph 3.3 suggests that the spatial strategy remains valid in terms of access to service and facilities, and meets the three dimensions of sustainable development set out within the Framework.

Initial questions

1. In view of the above, is the distribution of housing now proposed consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy?
2. The Regulation 22 Statement advises that the position within the settlement hierarchy has helped to determine the overall capacity for each settlement. Please could you explain this statement in more detail.
3. Relative to other settlements, notably Mildenhall and Red Lodge, and the Primary Villages category, housing growth at Newmarket is rather less than one might ordinarily expect, especially in the light of its general sustainability credentials. It is the district's largest market town, with a wide range of services and facilities, and is recognised as one of its most sustainable settlements, if not the most.
 - a) What precisely is the reason for this modest allocation? In answering this, we ask that the Council unambiguously explains the specific impacts of greater housing growth on the horse racing industry.
 - b) Would it be the presence of more houses that would cause the problem, or the increase in traffic and/or other human activity?
 - c) If the latter, given Newmarket's function as a market town, and the attraction of the race course, what evidence is there that the proposed spatial distribution will lead to less of the activity causing concern?
 - d) Overall, what evidence is there that indicates any harmful impact on the horse racing industry of greater housing growth in Newmarket?
4. The Local, National and International Impact of the Horse Racing Industry (2015) report recommends a highways study be commissioned in connection with the issue of highways conflict. Has this been undertaken/completed? If not what is the projected timetable?

5. How has the effect of housing growth on the horse racing industry been assessed in terms of the Sustainability Appraisal and where is the evidence in relation to this issue?
6. Is it correct to say that the Sustainability Appraisal starts from the assumption that greater housing growth in Newmarket would lead to harm to the horse racing industry? If so, please would the Council explain the reason for this.
7. The SIR notes the previous planning applications in relation to Hatchfield Farm. What bearing, if any, does the recent High Court judgement quashing the Secretary of State's decision have in relation to the soundness of the SIR?
8. Some 1129 dwellings are earmarked through the SIR for Red Lodge. What will be the effect of this in terms of Red Lodge's standing in the settlement hierarchy identified by Policy CS1? What evidence has the Council prepared to address this issue?
9. As a consequence of the successful High Court Challenge concerning Policies CS1, CS13 and CS7, numerous parts of the policies and other text were quashed. It would be of assistance to us, and no doubt to others, if the Council could provide an up-to-date version of the Core Strategy as amended by the judgment, in electronic form at least, showing the quashed paragraphs with a 'strike through'. This would help to prevent any confusion or scope for error, and to avoid the need to continually cross-reference to Appendix B of the SIR.
10. Please could you clarify what stage the Newmarket Neighbourhood Plan has reached since the Newmarket Neighbourhood Area was designated in December 2015.

Next steps

We have asked a number of questions and we appreciate that a little time may be needed to deal with them fully. We ask that you contact us as soon as possible to let us know the likely timescales involved. In the meantime, if you require clarification on any of the matters raised, we will be happy to elaborate.

We are hopeful that once we have your reply we will then be in a position to set out the matters and issues which will form the focus of the examination of the SIR. At that point we will arrange dates for the hearing sessions. It is likely that the examination of the Site Allocations Local Plan will run slightly behind that of the SIR. We will provide greater detail in due course, once the direction and likely timescales for the SIR examination are more certain.

We trust that you find this letter helpful. Please rest assured that we will do all we can to assist, and to give the Council every opportunity to address the issues raised.

We look forward to hearing from you at the earliest opportunity in relation to your view about the timescales involved. Please place a copy of this letter on the examination website.

Yours sincerely

Simon Berkeley and *Christa Masters*

Inspectors