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Forest Heath Core Strategy Public Examination

Matter 8 : Housing Strategy Policy CS7

Prepared by

Sellwood Planning

on behalf of

The Earl of Derby

December 2009

Regulated by RICS

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1.0 Introduction

1.1 This submission relates to Matter 8 “Housing Strategy – Policy CS7”. The submission has been prepared by Sellwood Planning on behalf of The Earl of Derby who is the freeholder of Hatchfield Farm to the north east of Newmarket.

2.0 (Q1) “Will Policy CS7 deliver the amount of housing required to meet the RSS requirements”?

2.1 Policy CS7 provides an appropriate level of guidance on the amount, distribution and timing of development across Forest Heath. It provides a clear and logical bridge between the Spatial Strategy as set out in CS1 and the subsequent Allocations DPD which will assess which sites will best deliver the housing provision. The SHLAA has shown that a range of sites are available which would more than meet the RSS housing provision to 2031.

2.2 On the basis of this, there is no reason to conclude that the combination of Policy CS1, Policy CS7 and the Allocations DPD will not deliver the RSS housing requirement.

3.0 (Q2) “Will the right amount of housing be provided in appropriate sustainable locations?”

3.1 Our submission on Matters 3 and 4 confirm that the broad urban focussed approach of the CS is the correct strategy to deliver a more sustainable pattern of development in Forest Heath. Whilst the sustainable credentials of Newmarket might suggest a provision of more than 1640 dwellings (2010 – 31), the submitted figure reflects the constraints posed by the distribution of protected horse racing land around the town and the tight administrative boundary.

3.2 The strategy for Newmarket is to provide around 1,200 dwellings and a mix of uses in an urban extension to the north east of Newmarket. Since the work undertaken as part of the IECA has confirmed (Appendix 3, pages 35 to 39 and Appendix 8 pages 6 and 7) that Hatchfield Farm is the only parcel of land which is capable of performing this role, the submissions on Matter 4 have already set out the reasoning why Hatchfield Farm should be identified as a strategic site in the Core Strategy. This requires amendments to Policy CS1 (set out in the Matter 4 submission), Policy CS7 and the creation of a new Policy CS (called CS*). Proposed Policy CS* is based on the emerging Sites Allocations DPD policy for Hatchfield Farm.

3.3 The proposed amendment to Policy CS7 is as follows

- (i) Point 3, p65 – Delete ‘Broad Locations’ heading and the first paragraph and replace with

“3. Strategic Site : Land at Hatchfield Farm, to the north east of Newmarket is identified as a strategic urban extension to accommodate 1200 dwellings and a range of other uses. Policy CS* is the site specific Policy for Hatchfield Farm”

- (ii) Insert ‘**Broad Locations at Brandon and Mildenhall**’ heading at start of existing second paragraph of policy on page 65
- (iii) Insert new policy CS* which is set out in full in Appendix 1.

4.0 (Q3) “Has the Needs Assessment shaped the policy – SHLAA, SHMA etc?”

4.1 It would be more accurate to say that the SHLAA and the SHMA have informed the detail of the policy rather than ‘shaped it’. This is because it is national and regional policies directed to moving to a more sustainable pattern of development which have ‘shaped’ the spatial strategy. What the SHLAA and SHMA have done is to ensure that, as far as possible, the housing provision will reflect the pattern of market demand

(SHMA) and the SHLAA confirms that for the purposes of the Allocations DPD, there are a range and choice of sites to make up the CS7 provisions.

5.0 (Q4) “How was the distribution of housing generated and is it appropriate?”

5.1 Once the overall ‘town centred’ spatial strategy was adopted as the most appropriate way forward, a number of different elements of the evidence base were brought to bear on the precise housing distribution. These included the infrastructure and environmental capacity work done in the IECA, the Flood Risk Assessment, SHLAA and SHMA. Whilst, in the end, it is a judgement concerning the precise number of dwellings to be allocated to each settlement, these various elements of the evidence base inter-relate and have ensured that subjectivity is kept to a minimum. As a result, the CS7 distribution is underpinned by the evidence base and is appropriate.

6.0 (Q5) “How does the policy respond to the need to ensure adequate housing land supply over 5, 10 and 15 years?”

6.1 The SHLAA, the information provided by landowners / developers and the infrastructure assessment provided by the IECA all provide insights into the various factors which will influence when sites can be brought forward. The detail of this in respect of individual sites will be tested as part of the process of preparing the Allocations DPD. However, given that more sites were identified in the SHLAA than will be needed to meet the RSS housing provision to 2021 and 2031, it is unlikely that, in combination, the CS and the Allocations DPD will not be able to ensure an adequate supply of housing land over 5, 10 and 15 years.

7.0 (Q6) “Is the phasing regime realistic, appropriate, deliverable?”

7.1 It is appropriate that Policy CS7 sets out the broad phasing of housing completions in each of the main settlements. There is no reason to believe that the Allocations DPD

cannot define a portfolio of sites to meet the phasing requirements of CS7. However, it is important that it is recognised that what is set out in CS7 is a broad guide rather than a set of prescriptive figures.

- 7.2 With regard to Hatchfield Farm, Lord Derby has already commenced the preparation of a planning application which will have been submitted prior to the start of the public examination. The assumption is that the site would produce around 80 completions per year over a fifteen year period. The site is capable of producing its first house completions in 2012. On this basis, the site is capable of easily delivering at least 200 new homes by 2015.

8.0 (Q7) “Would the policy deliver an acceptable brownfield / greenfield mix of new housing land?”

- 8.1 Forest Heath is a district which is characterised by a relatively low percentage of previously developed land. In accordance with the advice in PPS1 and PPS3, FHDC has sought to achieve the maximum use of previously developed land consistent with other policy, environmental and infrastructure constraints. However, it is also recognised by PPS3 and the RSS that the achievement of the required housing provision will require the development of significant amounts of greenfield land. The CS is, therefore, consistent with this advice.

9.0 (Q8) “Should priority be given to brownfield sites before greenfield development is allowed?”

- 9.1 In order to achieve the RSS housing provision it will be necessary to bring forward both greenfield and brownfield sites together. However, since many greenfield sites will take some time to work their way through the planning system and undertake prior infrastructure works, the CS is effectively giving brownfield sites priority in the period to 2015. For example, in the case of Newmarket, only 200 completions are expected on greenfield land prior to 2015.

10.0 (Q9) “Has recent economic context been considered / modelled?”

10.1 Whilst it is clearly the case that the CS should reflect an awareness of the current economic context, it should be recognised that the recession of the past year is almost unprecedented in its severity and many indicators are now suggesting that the economy may resume growth in 2010. On this basis, it would not be appropriate to base the provisions of a Core Strategy with an end date of 2031 on the particular adverse economic climate of 2009.

10.2 Advice on this point is contained in paragraph 14 of the Planning Inspectorate document “LDFs – Learning from Experience” (September 2009) where it is stated

“The economic climate is also clearly a factor that can cause great uncertainty. However, DPDs, particularly Core Strategies, are intended to guide development over the long term. Accordingly, exceptional economic conditions should not be used as an excuse for delay and plans should be based on what may be regarded as normal conditions”.

11.0 (Q10) “Will it affect viability in the short / medium term?”

11.1 The recession will have an effect on viability in the short term, although there are already early signs that housebuilders are back in the market seeking to acquire new sites. In the case of Hatchfield Farm, Lord Derby has confidence in the economic future and is promoting his site through the planning process at the current time. Lord Derby is also confident that his proposals for Hatchfield Farm are both viable and deliverable in the plan period.

12.0 (Q11) “What implications does this have for the delivery of planned dwelling numbers and funding / phasing of infrastructure and housing schemes themselves?”

12.1 It is only possible to speak on behalf of Lord Derby and the Hatchfield Farm site. In this case, a planning application will be submitted shortly and it is envisaged that planning permission could be granted later in 2010, after the adoption of the Core Strategy. This will allow the site to be brought to the market in 2010 / 2011. For those reasons, the recession has had no impact on the delivery programme for Hatchfield Farm.

13.0 (Q12) “Has regard been had to the impact of development on the strategic highway network?”

13.1 It is only possible to respond on behalf of Lord Derby in respect of north east Newmarket / Hatchfield Farm. At each stage in the Core Strategy process, discussions have taken place between Forest Heath Council, Suffolk County Council and the Highways Agency regarding the impact of development in Newmarket on the A14 / A142 junction. At each stage it has been agreed that whilst the junction will require improvement, solutions exist which can satisfactorily mitigate the traffic impact. WSP, as Transportation advisors to Lord Derby have also been in discussion with FHDC, SCC and the Highways Agency regarding the impact of the Hatchfield Farm development. These discussions have included agreeing the scope of the TA and the Highways Agency validating the model used to test the A14 / A142 junction. It is understood that a Statement of Common Ground between the parties will be submitted to the public examination confirming that, whilst detailed proposals need to be agreed, the parties are confident that the junction can be upgraded to an appropriate standard.

13.2 The conclusion to be drawn from the above is that in the case of Newmarket and specifically north east Newmarket, full regard has been taken of possible impacts on the strategic highway network and the range of works necessary to mitigate them.

14.0 (Q13) “Is there enough flexibility in the policy to allow for alternative sites to come forward?”

14.1 Policy CS7 provides a high level of flexibility to allow alternative sites to come forward within the overarching hierarchy settlement hierarchy in Policy CS1. The SHLAA confirmed that a range of sites are available in all settlements except Newmarket to meet the CS7 provisions. These will be tested through the Allocations DPD process. Should sites identified within the Allocations DPD not come forward, the combination of CS1 and CS7 provide clear guidance on the broad location for alternative sites.

14.2 In the case of Newmarket, there are no other sites available to provide a 1200 dwelling strategic site other than Hatchfield Farm. It is for this reason that Lord Derby is progressing a planning application for the site. This provides clear evidence that the landowner is taking proactive steps to bringing the site forward. The application also demonstrates that the proposal has no ownership, infrastructure and environmental constraints which would inhibit its early development.

15.0 (Q14) “How will the policy be monitored and the trajectory be managed to achieve delivery?”

15.1 This question is one primarily for FHDC to answer since it will be the body responsible for monitoring. However, it is considered that the Core Strategy provides adequate guidance on this issue. It is anticipated that the Council’s Annual Monitoring Report will be a critical input in both monitoring and managing the housing trajectory.

16.0 (Q15) “Should the housing trajectory be more prominently located in the CS?”

16.1 Yes, the trajectory could be given more prominence although this issue does not bear on the soundness of the Core Strategy.

Appendix 1

Proposed Allocation Policy CS* Hatchfield Farm

“The site at Hatchfield Farm, east of Fordham Road (64 ha) is allocated for a mixed use development to include the following:

- **1,200 dwellings of mixed size and type at a minimum density of 35 dwellings per hectare within the housing development area;**
- **a minimum of 3 hectares of employment land to include provision for a high quality office element;**
- **a local centre to include 300 sq. metres of convenience floorspace and appropriate provision for other services;**
- **a new community facility within the site to serve the needs of north-east Newmarket, with appropriate provision within it for the arts and indoor sports activities;**
- **a new two form entry primary school to serve the development;**
- **8 hectares of playing field provision in accordance with standards in the Council’s Supplementary Planning Guidance (which may be in association with the community facility above, or with the school).**

The development will be subject to the preparation of a design brief in accordance with this policy, to demonstrate a high quality, sustainable urban design for the whole development. The Brief shall be prepared in consultation with and approved by Forest Heath District Council as a supplementary design statement before planning permission is granted and any permission will conform to the Brief. The Brief will include appropriate phasing of provision in accordance with the Core Strategy policy CS7, ensuring that each phase of development makes suitable provision for the community facilities and infrastructure requirements listed below and for affordable housing in accordance with policy CS9 of the Core Strategy.

The development will provide for adequate screening between residential areas and the A14 trunk road and A142, in order to avoid excessive noise levels, and between itself

and the stables / pasture land to the south, in order to avoid undue disturbance to horses.

The development will provide for or contribute to the following community and infrastructure requirements, where these are shown to be necessitated by the development

- i) improvements to the A14 / A142 junction layout;**
- ii) traffic management and calming measures on Fordham Road and other sections of the route into Newmarket centre;**
- iii) provision for an additional bus route;**
- iv) pedestrian and cycle routes;**
- v) primary health care provision**
- vi) a proportionate contribution to an upper school extension;**
- vii) a proportionate contribution to improvements to the provision of horse lanes and public equine facilities through the built up area of Newmarket;**
- viii) a renewable energy facility;**
- ix) a transport assessment and travel plan.”**