

3rd March 2010

Mr R N Ploughman
Development Control Manager
Forest Heath District Council
College Heath Road
Mildenhall
Suffolk
IP28 7EY

For the attention of David Beighton

Dear Mr Ploughman,

Planning Application F/2009/07/0713/ESO

Comprehensive mixed use development of Hatchfield Farm, comprising up to 1,200 dwellings; up to 36,000 m2 of B1 employment floorspace of which not more than 10,000 m2 will be office floorspace (B1(a)); Community facilities (up to 1,000m²) of D1 uses; Retail and food and drink uses (up to 300m² of A1, A3, A4 and A5 uses); Park & Ride (up to 100 spaces); Primary School reservation (2 form entry); Two vehicular accesses into the site - improvement of the A142 / Willie Snaith roundabout to provide a fourth (east facing) arm and a new roundabout access on the A142 north of the A142 / Studlands Park Avenue roundabout and the realignment of the A142; A pedestrian / cycle access on to Snailwell Road; Internal footpaths, cycle routes and estate roads; Playing fields and pavilion, children's play space, informal open space, allotments and landscaping; Foul and surface water drainage infrastructure, as amended by plans received 26th February 2010. (Major Development and Departure from the Development Plan)

1. The Suffolk Preservation Society (the Society) is pleased to be able to submit the following representations aimed at assisting the LPA in its determination of the above application. They are made without prejudice to comments the Society might subsequently make on the details of the proposal. It asks that they are conveyed, in their entirety, to the Committee and Members whenever the application is discussed, considered and determined

Background

2. The Society submits only observations on the principle of the development. It does not propose to provide detailed analysis of the planning merits of the proposals until the LPA have determined the principle. This is because the Society considers at this time, the proposal is premature and therefore it would be unwise to devote its limited resources to commenting on the detail when the application may not proceed in anything like its current form.

3. The Society appreciates the problem the council finds itself in is identifying and bringing forward housing sites to meet the minimum target in the East of England Plan 2008. The Society has been concerned that the “top down” process of establishing housing targets, nationally and regionally without sufficient regard to environmental limits and capacity as well as the views and concerns of local communities, concludes with the council often having to bring forward and promote sites local people and communities find totally unacceptable. The need to deliver the RSS housing target for Forest Heath District up to 2021 or 15 years after the adoption of the Core Strategy must not be at the cost of the local environment, retaining Suffolk’s distinctiveness or against the will of local communities.

Principle of Redevelopment and Development

4. The Society submits that whilst policies CS1 and CS7 of the Submission Draft of the LDF Core Strategy identify broadly land at North East Newmarket for development, very significant objections were raised to these policies. Accordingly, we must await the Inspector’s report in the light of the submitted evidence before the validity of this strategy is accepted and furthermore whether the District Council subsequently chooses to adopt the Core Strategy. The Society has very significant concerns regarding the highway implications of the proposed development and moreover its impact on the equestrian industry that quintessentially characterises the historic town. We have fundamental concerns that the development would have a significant adverse impact on the Highway network and, in particular, strategic highway junctions. The Society is also concerned that the horse crossings that provide the lifeblood of the town, would be adversely affected by the increase in associated traffic movements. The Highway modelling appears particularly brittle and could potentially create very considerable problems in our opinion.

5. The development of the area represents a major change and very significant planning issue, not least for the local community. They understandably are against the total package due to its scale and impact. Given this the Society sees it as fundamental that the future of the whole area is determined through the LDF process via the Core Strategy and if appropriate SHLAA. This will allow the local community, the Society and others stakeholders, to have their concerns aired and considered by the independent inspector through the LDF EIP and allocations process. The Society believes that prematurity is a valid reason to refuse the application at this stage.

6. It is unfortunate, in the Society’s view that the applicants have progressed this application in advance of the LDF process. It has only apparently alienated communities and others against the principle of the proposal and for them to be seen as potentially trying to influence or pressurise the council into allowing the site for future development despite valid objections from local communities. This serves to undermine the LDF process and discredit the whole system in the eyes of the wider community.

7. The Government has made it clear that it expects councils to determine the future of sites and developments of this nature and scale to be via the LDF process and not via ad-hoc planning applications. Therefore, the Development Control process should not be the way the future of the site is determined as it will seriously prejudice the

Inspectors findings on the appropriateness of the LDF Core Strategy. The Society believes that the lpa cannot approve the proposal or Secretary of State realistically allow any appeal in advance of a final decision on the LDF Core Strategy Submission.

Concluding comments

8. Given the above, the Society suggests the following:

- a. The application is withdrawn, or at least deferred/held in abeyance at this stage to allow the lpa to consider the outcome of the Submission Draft of the Core Strategy and the Inspector's findings regarding the soundness of the LDF Core Strategy as a whole;

or

- b. The application is refused as premature until adoption of the final version of the LDF Core Strategy by the council has taken place.

9. In the event, that for whatever reason, the LPA decides not to follow the suggested courses of action in 8 a. or b. above, and to proceed with the processing of the application with a view to its approval, then the Society would be pleased to submit comments aimed at ensuring any proposal and development addresses major issues and concerns and is of the highest possible environmental, design and sustainable standards.

10. The Society asks to be kept informed on the processing of the application and specifically to be consulted on the details once the principle of development has been considered preferably via the LDF process. It would ask to be consulted on all amendments. It also asks to be informed of the eventual decision on the application.

Yours sincerely



Simon Cairns DipTP Dip Bldg Cons (RICS) MRTPI IHBC
Director

Cc Go East

Cc Richard Spring MP

Cc SPS Executive

Cc SPS Forest Heath District Committee, Warwick Hirst District Chair

Cc PTC Committee

Cc John Pitchford, Strategic Planning and Sub-Regional Partnerships Manager - Suffolk County Council

Cc Save Historic Newmarket – Rachel Hood

Cc Liz Marchington – Five Villages Preservation Trust