Paragraph 14 of the NPPF says

“Local Plans should meet objectively assessed needs ………..”

We submit that the need for SS8 has not been objectively assessed.

1 In February 2012, the Inspector raised “Further Questions” the first of which began

“The evidence bundle appears to have been prepared by the developer …”.

This implies a lack of objectivity. The reply from Mr Lewis of SDC does not demonstrate objectivity but refers to previous failed attempts to redevelop the racecourse, implying (#1.2) a lack of real commitment from the owners. In #1.5 he refers to SDC having worked with Arena Leisure and RPS to consider the options. In #1.8 he refers to local consultation. We were part of this and can state that there was no objective assessment of need, only a choice of designs. Nowhere has there been a public, independent or objective verification of the need for the particular elements of SS8. It is our understanding that SDC has been led by RPS throughout this process, willing to believe, despite all the objective evidence that the ‘new’ racecourse can be a major tourist attraction, leisure provision and economic milch cow.

2 The racecourse owners have said for decades that the racecourse fabric was in decline and this is likely to be true, but the need for root and branch destruction and redevelopment has never been objectively demonstrated. The scale and nature of the proposed development (a new racecourse!), is entirely the subjective whim of Arena Leisure and RPS. There is no evidence that a simpler refurbishment of the present stands and other structures could not be attempted or has been considered.

3 Arena Leisure have refused every invitation by us to identify the likely cost of this grandiose redevelopment of the racing facilities, but the Quod Viability updates says (#4.11) that

“the new (sic) racecourse is expected to cost in the region of £30m and this has been verified by independent cost consultants …..”, and in #4.16 adds

“A project of this type should be securing a 20% margin on cost.”

On this small, vague and unsubstantiated evidence the whole scale of the housing estate is based. There must be sufficient houses to fund the redevelopment. We note #4.19

“ ………….. gives a total of £42.75m and this consequently represents the current market target residual land value before the scheme is capable …..”.

There is nothing objective about these figures.

4 The number of houses is set by the Local Plan as “up to 820”. This is not objectively derived. It comes from the number required to fund the arbitrary notional cost of £42.75m of the completely reconstructed (‘new’ according to Quod) racecourse as shown in #2.3 of the June version of the Quod Viability Update. Here there is consideration of three possible numbers of houses, viz, 607, 817 or 924. No explanation is given for this strangely precise selection, but it seems that 817 fits the bill in providing just sufficient funds: the fact that the residual land values are inflated and all infrastructure costs have been ignored is further evidence that this has not been an objective process, but this is the origin of the SDC figure of “up to 820” dwellings in SS8 … hardly an objective assessment of needs.

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