

**Forest Heath and St Edmundsbury Joint Development Management Policies Submission Document**  
**October 2012**  
**Public Participation Report**

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
<b>1 Introduction</b> <b>Paragraph 1.1</b>		
20630	Object  Legal no  Sound No	Although little evidence of SHMA appears to exist in the preparation of the CS, given that it accepted that needs may be in conjunction with neighbouring authorities ie. regional levels of housing, then the SA should also have taken account of migration and demographic change.  If both councils Core Strategies are adopted and the DM is in conformity with them, then the CS and this DM policy fail to address the inadequate situations that arise in settlements where Parish Profiles have been used to form this strategy and where this strategy fails to address the inadequacies of these profiles.
20646	Object  Legal No  Sound No	In reviewing Chapter 5 Housing and Homes there appears not to be a policy that would cover small development, less than five properties, or individual properties within the sustainable villages.  There is partial but exclusive reference in the following policies, DM25, 26, 28 against which I have commented.  Consider this apparent omission of a relevant policy document for small or individual development, within the sustainable villages, should be included in Chapter 5. Thus any proposal for appropriate new development could be judged against the policy. There is not a section to make this statement thus it is included in Chapter 1.
20496	Support	No comments to make.
<b>Paragraph 1.14</b>		
20661	Object  Legal Does not say	Still in dispute with St. Edmundsbury Borough Council over Core Strategy. Hargrave was declared a non sustainable village which is not accepted by many residents of Hargrave. Should not proceed with any new consultation process until village reverted to its original status

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Sound Does not say	
20666	Support	Suffolk Preservation Society finds the document generally sound
20668	Object  Legal Does not say  Sound Does not say	Request for additional policy DM53: Heath Impact Assessments.
20670	Object  Legal Does not say  Sound Does not say	Lack of over-arching housing policy - a 'one stop shop'. This should cover: 1 Scale of development requiring a masterplan or development brief 2 Define the policy requirement for housing developments which do not fall in the above 3 Refer to need to comply with SEBC core Strategy CS5 and 4 On appropriate sites provide for low cost market housing Provide low cost market housing as a part of all urban and rural developments to meet need and fill the gap between affordable and market housing
20673	Object  Legal Does not Say  Sound Does not say	General comments. Need more housing for young people with plenty of land locally (Haverhill) that can be used. Need more employment. Sports centres and other venues of entertainment should be free in school holidays. Litter is a disgrace
20677	Object	On behalf of Royal British Legion.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal Does not say  Sound Does not say	Comments that the front cover of the Submission Document shows a road going through a WW11 airfield near the A14 at Bury St Edmunds where air crew died. Considers putting a road through the site is a sacrilege.
20691	Object  Legal Does not say  Sound Does not say	General comments. Why build more houses in Lakenheath where there are no decent facilities eg shops and poor access for the disabled eg post office, library and bank. We need a superstore, bus shelter and seat at both ends of the village.
20697	Object  Legal Does not say  Sound Does not say	On behalf of Clare Town Council Concerned about lack of any reference to a residential buffer zone around any windfarm development in the light of the fact that these are now being brought in by other councils.
20714	Object  Legal Does not say  Sound Does not say	Omission - no statement of plans delineating the outer boundary of towns where it meets the countryside.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20669	Support	Policy DMI Support sustainable development at Risby (Church Road site), Westley (Barns), Vinefields Leg of Mutton Field) and Saxham.
20672	Support	Newmarket Town Council accepts the document in its entirety. In addition recognize the tremendous amount of work involved to produce the document
20684	Support	The Highways Agency has no comments
20705	Support	On behalf of the Suffolk Wildlife Trust. Thank you for consulting us on the Forest Heath and St Edmundsbury Joint Development Management Policies Submission Document, I can confirm that we have no comments to make on the document.
20688	Support	On behalf of Mildenhall Parish Council Thank you for sight of your Joint Development Management Policies Consultation Submission Document. I hope I don't sound patronizing when I say how well it is arranged and presented. Chapters 4 and 5 headed environment and housing and homes (DM25 in particular) will, I am confident, prove extremely helpful to us at the Parish level. We look forward to a copy of the final version.
20687	Support	I write to confirm that this Council has no representations to make
20663	Support	I wish for my land at Mill Lane, Hopton to be developed for affordable housing
20662	Support	We encourage early engagement with developers to identify any infrastructure constraints and necessary upgrades required. On receipt of a pre planning enquiry, we are able to give an indication of cost/developer contribution to upgrades to network and assist in calculating the overall cost of the development
20689	Support	Thank you for consulting Norfolk County Council on the above joint Affordable Housing Supplementary Planning Document and Joint Development Management Policies Submission Consultation Document. At this stage it is not considered that the documents raise any strategic cross-boundary issues with Norfolk County Council. Obviously you would consult the County Council when you review your Local Plan, I assume, under your statutory duty to co-operate (Localism Act 2011), that if you feel there are any strategic cross boundary issues arising or likely to arise that you would seek further discussion with Norfolk County Council i.e. through myself or Stephen

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		Faulkner as the first point of contact.
20664	Support	Thetford Town Council have no comments to make
<b>Policy DM1 – Presumption in Favour of Sustainable Development</b>		
<b>Paragraph 2.1</b>		
20569	Object  Legal Yes  Sound No	Duty to co-operate in relation to impacts on the Breckland SPA
<b>Paragraph 2.2</b>		
20649	Object  Legal No  Sound No	<p>There is lack of coordination between Government Policies, Borough Council, and Local Authorities. One situation that arises when areas such as key service centres are expanded is that it limits local services for existing occupants in favour of providing these services for new developments. There are also a number of procedural failures in the methodologies adopted by the planning committees which this DM should address because they undermine the democratic process: a) only summary notes are taken of the salient points along with the decision b) the planning response is "written up" by the planning officer. c)transcript is destroyed</p> <p>Changes to Plan: Following implementation of CS, LAs should rewrite their school admission policies to reduce environmental impact, encourage sustainable transport patterns and to ensure existing residents are not pushed away from their local school in favour of occupants of closer new developments. Development control minutes should be available on request and contain clear, precise and comprehensive reasons for taking decisions. If significant valid material considerations or application contravenes policies, then approval should not be granted. 3rd party objectors should not have to initiate high court action against invalid decisions. The system should work and should support planning policy and its objectives.</p>

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20551	Object  Legal Yes  Sound Yes	<p>Considers that there is no clear guidance on how this will work. The use of the word sustainable is misleading. This policy and its weighting do not balance the needs of communities or the environment adequately or fairly against the interests of business.</p> <p>With the economic over ruling any other impact, this is a blank cheque for any potential development and unhelpful in the determination of appropriate planning outcomes.</p> <p>Where policies are out of date at the time of making a decision, then the councils should continue to refer to the previous policy until new is in place, to avoid "temporary policy vacuums".</p>
20707	Support	Detailed comments in attachment
<b>Policy DM2 – Creating Places – Development Principles and Local Distinctiveness</b>		
20435	Object  Legal Yes  Sound No	<p>Paragraph f relates to National and detailed policies, but does not make provision for land identified through public consultation as potential country parkland (open space) to be provided.</p> <p>To produce country parkland the policy if formulaic only produces pockets of parkland with each development. The amendment suggested, enables through the dynamic process of consultation, the identification of Country parkland where a community is deficient in its provision.</p>
20642	Object  Legal Yes  Sound No	<p>Object to DM2 sub section e) as wishes to retain the word 'large' within the context 'not involve the loss of large gardens' as without this inclusion there would be the ability to allow the garden to be divided into smaller developmental plots and small gardens and no means of stopping the multiplicity of spaces within a village.</p> <p>Objection to the inclusion of the word 'significant', as consider that all gardens make a contribution to the character of the setting in which they are located.</p>
20552	Object	c) 'Preserve & enhance the setting....' Question why should this be restricted to conservation areas? Consider that every established neighbourhood has aspects that

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	Legal Yes  Sound No	deserve to be preserved and enhanced.
20682	Object  Legal Does not say  Sound No	On behalf of British Sugar Factory, Bury St Edmunds DM2 criterion (h) is unsound. We request that 'where appropriate' or 'where there is proven need' is inserted into the policy, where the policy requires rests or supporting information for all development. Support DM2 criterion (i)
20686	Object  Legal Does not say  Sound No	Proposed change delete 'any concept statement from d)
20694	Object  Legal Does not say  Sound No	Not sufficiently flexible

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20698	Object  Legal Does not say  Sound No	Not sufficiently flexible
20715	Object  Legal Does not say  Sound Does not say	Believe the policy should be amended to reflect the desire within communities to raise the quality of development. Developers should comply and produce designs based on BREEM standards.
20666	Support	Suffolk Preservation Society
20674	Support	Key words are 'as appropriate'
20707	Support	Detailed comments in attachment
<b>Policy DM3 – Masterplans</b>		
<b>Paragraph 3.5</b>		
20656	Object  Legal Yes  Sound no	Concept Statements prepared by the LPA are often funded by the developer due to resource and timing issues, which is unacceptable. In our experience, little or no account is paid to the developer's comments during the preparation or the public consultation period. The Crown Lane, Ixworth, Concept Statement indentified off-site works, which were promised to the local Parish Council which were ultimately undeliverable. The Concept Statement has only resulted in alienating the community which is extremely unhelpful. Concept Statements, if retained, must actively engage with and listen to the developer to assess what is deliverable.
20640	Support	With reference to section e) - Council believes that all new developments should seek to



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		protect the historic environment in which they are set
20641	Support	With reference to section c) if the masterplan requires 'green infrastructure' and 'sufficient recreational greenspace' to be implemented for the development of sites subject to Masterplans there will be an affect on the setting of the villages into which any new development in introduced.
20666	Support	Suffolk Preservation Society
20553	Object Legal No Sound No	Overdevelopment in key services centres, with narrow roads is affecting access to and use of the key services. KSC's need a masterplan approach to address the existing problems before further development proceeds. The inadequacies of the system to provide infrastructure to support existing and continuing development links directly to a poorer quality of life, health & wellbeing of effected communities. Tensions caused by poor infrastructure planning directly links to crime and increased road safety risks. DM policy fails to address the implementation of measures required to meet the key spatial planning objectives that arose from parish profiles.
20572	Object Legal Yes Sound No	The requirement for an allocated site to await the preparation of a Council prepared Concept Statement should be deleted from the policy. This is an unnecessary tier of bureaucracy and will delay much needed sustainable development contrary to paragraph 14 of the NPPF.
20615	Object Legal Yes Sound No	The requirement to produce, concepts statement, master plans, development briefs, Spuds, design guidance is likely to place a major strain on the Council's resources over the next few years at a time when funding is reduced. There is a danger that developments cannot simply be progressed if the Authority's resources are stretched. The policy results in rigid approach, contrary to the aims of the NPPF which seeks to ensure plans can respond flexibly.
20655	Object Legal Yes	Master plans prepared in advance of a planning application act as barriers to delivery. The master plan in the case of 2.5 ha at Crown Lane, Acworth allocated in 2006 has taken four years to achieve. The requirement for the LPA to produce and consult on a Concept Statement, which promised to deliver landscaping and open space on land beyond the control of the developer and then to consult on a Master plan which excludes

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	Sound No	these elements has put back the development and created a feel of animosity between local residents and the LPA.
20657	Object  Legal Yes  Sound No	Reference to concept statements, master plans and development briefs delay delivery making the plan ineffective. Policy 2 should be deleted or if retained a clear threshold incorporated when the policy would apply. The extensive nature of the policy is akin to the range of elements requiring consideration of a major urban extension or new settlement and is entirely too prescriptive for the majority of applications and development allocations.
20683	Object Legal Does not say  Sound Does not say	Concerned that master plan approach will place unnecessary barriers to future improvement of operations. Need consistency with Vision 2031 document Policy BV16?
20694	Object  Legal Does not say  Sound No	Proposed application is too wide and conflicts with aims of national policy to reduce bureaucracy.
20698	Object  Legal Does not say  Sound No	Proposed application is too wide and conflicts with aims of national policy to reduce bureaucracy.
20686	Object	Not justified, effective, consistent with national policy. Propose delete

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal Does not say  Sound No	
20699	Object  Legal Does not say  Sound Does not say	On behalf of Wait rose Limited. DM3 g) suggests clarifying that retail development outside of existing centres should be of an appropriate size and scale to meet local needs only and justified by a retail impact assessment
20703	Object  Legal Does not say  Sound Does not say	On behalf of Kestrel Property and Land Ltd, promoters of land in Brandon. Overall supportive of the DPD but concerned about aspects of Policy DM3. Master planning should not be delayed to allow for the development of a concept statement. Suggest first Para. of policy is amended as follows: 'Master plans will be required for proposals on land allocated in Local Plan and the Sites Allocation DPD where a Concept Statement has been prepared or where a site is, because of its size, location or proposed mix of uses determined by the Local Planning Authority to require a master planning approach, Master plans will be based upon a Concept Statement, (if one has been prepared by the Local Planning Authority) or the content of Local Plan. For the avoidance of doubt a master planning exercise shall not be delayed to allow the Local Planning Authority to bring forward a Concept Statement.
20674	Support	Suggest Master plan items to include analysis of site conditions, consultation feedback and potentially competing design requirements.
20707	Support	Detailed comments in attachment
20715	Support	Agree with suggested changes.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
<b>Policy DM4 – Development Briefs</b>		
<b>Paragraph 3.6</b>		
20658	Object  Legal Yes  Sound No	Development Briefs act as a barrier to development and, if undertaken, should be incorporated into the planning application stage. Any reference to Development Briefs prior to the submission of a planning application should be deleted from the document.
20436	Object  Legal Yes  Sound No	Consider that provision f requires modification to preserve existing woodland belts, which otherwise could have their integrity destroyed by cycleways, as the developers create "glades"
20582	Object  Legal Yes  Sound No	The requirement for an allocated site to await the preparation of a Development Brief is an unnecessary tier of bureaucracy and will delay much needed sustainable development contrary to paragraph 14 of the NPPF. The policy should be deleted.
20610	Object  Legal Yes  Sound No	We welcome the statement in para. 3.6 That Policy DM4 does not apply to sites where a masterplanned approach is taken. However, that is not consistent with DM3 b) which requires the masterplan to define parcels for which "separate development briefs will" then be required.
20659	Object	Development Briefs act as a barrier to development and should be incorporated into the planning application stage. Any reference to Development Briefs should be deleted from

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal Yes  Sound No	the document. The extensive nature of the policy requirements is more akin to the range of elements requiring consideration of a major urban extension or new settlement and is entirely too prescriptive for the majority of applications and allocations.
20666	Object  Legal Does not say  Sound Does not say	Want a requirement that the impact of development be mitigated and suggest this is added to part d) of the policy
20682	Object  Legal Does not say  Sound Does not say	Similar concerns to DM3 above if applied to British Sugar site.
20686	Object  Legal Does not say  Sound No	Concerned that it will add cost and delay to development. Propose delete
20694	Object  Legal	Proposed application is too wide and conflicts with aims of national policy to reduce bureaucracy.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Does not say Sound No	
20702	Object Legal Does not say Sound No	On behalf of Elveden Farm Ltd DM4 Unsound. Unduly restrictive and not consistent with national policy.
20714	Object Legal Does not say Sound Does not say	On behalf of Nowton Court Retirement Village, Bury St. Edmunds. DM4 Should specifically include reference to provision for the elderly and the elderly in care (use class C2).
20665	Support	Proportion of affordable homes must be kept reasonable otherwise lead to rise in house prices and developers will stop building
<b>Paragraph 3.7</b>		
20474	Object Legal Does not say Sound Does not say	Consider the following to be more appropriate: The quality and character of the countryside should be protected for its own sake and where possible enhanced and planning therefore has an important role in supporting and facilitating development and land use which enables those who earn a living from, and those who help maintain and manage, the countryside, to continue to do so.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
<b>Paragraph 3.8</b>		
20475	Object  Legal Does not day  Sound Does not say	Each para should use words in full at start rather than abbreviations ie NPPF
20479	Support	Any new developments within the countryside should be small scale 'pockets' of development rather than large scale new housing estates.
<b>Policy DM5 – Development in the Countryside</b>		
20477	Object  Legal Does not day  Sound Does not say	Section k) should include character ie: the proposed replacement dwelling respects the scale, character and floor area of the existing dwelling.
20476	Object  Legal Does not day  Sound Does not say	Section h) should reflect the NPPF para 125 on the issue of light. ie planning policy and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20609	Object  Legal Yes  Sound No	Housing settlement boundary of Bury St Edmunds has not yet been amended and strategic urban extensions might be seen as outside urban areas. Therefore tension between Policy DM5 and the Core Strategy until the settlement boundaries are re-drawn. Introduction to policy needs amending to refer to the urban extensions or additional criteria needs to be added.  Approach to B&MV is inconsistent with NPPF. B&MV is a factor to weigh alongside other sustainability criteria rather than a blanket approach of its protection. Add new criterion "it is identified in a Core Strategy as a direction of growth"
20432	Object  Legal No  Sound No	Bury shopping centre is already overcrowded any more so called development I will simply move away to a better area and will live and shop elsewhere
20666	Object  Legal Does not say  Sound Does not say	Suggest that 'character' is added to 'visual amenity of the landscape' as these issues are different
20675	Object  Legal Does not say  Sound	On behalf of the Garden Centre Group, owners of Bury St Edmunds Garden Centre. Concerned Policy DM5 does not reflect NPPF in particular para.28 and is therefore unsound. It retains the prescriptive list of uses with which a new or extended building needs to be associated with.  Refer to previous representation 23rd February 2012 and suggested wording:



<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	No	<p>' l) It is associated with the sustainable growth of a lawfully established existing business, and could be achieved without detriment to the character or amenities of the area.'</p> <p>Para a) of DMP should be amplified in order to confirm that development requiring a countryside location could include specialist retail uses such as nurseries, garden centres and farm shops</p>
20694	Object  Legal Does not say  Sound No	Does not give sufficient scope to allow development in the countryside. Part b) on agricultural land is too restrictive and contrary to NPPF.
20698	Object  Legal Does not say  Sound No	Does not give sufficient scope to allow development in the countryside. Part b) on agricultural land is too restrictive and contrary to NPPF.
20702	Object  Legal Does not say  Sound No	Does not go far enough to promote growth in the rural economy. Not consistent with national policy.
20704	Object	DM5 d) suggest replace 'road' with 'highway'

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal Does not say  Sound Does not say	
20592	Support	This is an important policy, but one which SEBC intends to ignore in respect of the huge proposed expansion of Bury. Essentially all the land areas proposed for urbanisation are on Grade 3a land. It is useless to have a policy and immediately ignore it.
20665	Support	Detailed comments in attachment. Prioritise Brownfield and previously developed sites before development of the open countryside
20674	Support	Should be applied in the countryside outside of the strategic development areas identified in Core Strategy CS11 and more specifically in the draft Bury St. Edmunds Area Action Plan
20685	Support	DM5 I) On behalf of Upton Suffolk Farms
20679	Support	On behalf of the Newmarket Horsemen's Group (NHG). NHG consider the Submission Consultation is broadly sound, particularly Policies DM2, DM5, DM32, and Chapter 9 which deals specifically with development relating to the horse racing industry.
<b>Policy DM6 – Flooding and Sustainable Drainage</b>		
20546	Object  Legal Yes  Sound Yes	By allowing further building/concreting in any way, shape or form near to flood areas (or areas with poor drainage) will not help to reduce flooding.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20606	Object  Legal Yes  Sound No	<p>Policy DM6 requires that all developments incorporate proposals for water recycling. The plan does not appear to be accompanied by an assessment of the likely cumulative impacts on development of "...all existing and proposed local standards, supplementary planning documents and policies that support the development plan..." as required by para. 174 of the NPPF. From the evidence base it is not possible to conclude that the cumulative impact of standards and policies would not put implementation of the development strategy at serious risk.</p> <p>The approach is:</p> <ul style="list-style-type: none"> <li>- Not consistent with National Policy</li> <li>- Not justified</li> <li>- not effective</li> </ul>
20676	Object  Legal Does not say  Sound No	<p>Consider DMP fails the test of soundness as the issues raised in our letter of the 8th March 2012 have not been addressed.</p> <p>DMP does not consider the details of the Level One Outline Water Cycle Study (August 2009), nor the potential detrimental effect to water quality as a result of development growth. Therefore DMP does not comply with section 165 of NPPF.</p> <p>Suggest a policy see attachment for details.</p>
20702	Object  Legal Does not say  Sound No	Too vague and unduly onerous for small scale schemes.
20665	Support	Sturmer has suffered in the past from significant flooding and drainage of land and properties. Strict adherence to principles of sustainable drainage and flood prevention is essential.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>
<b>Policy DM7 – Sustainable Design and Construction</b>		
<b>Paragraph 3.14</b>		
20580	Object Legal No Sound No	Without valid methodology it will not be possible for developers to demonstrate this. Just take the example of the SA of St Eds CS for strategic sites evaluated key sustainability issues before deciding what mitigation may be necessary. However, point13 - the indicator used did not relate to achieving the objective. Similarly point14 - having access to a road is not a valid indicator to reduce climate change. The whole SA of the CS is fundamentally flawed, so how can you expect developers to be honest?
20564	Object Legal Yes Sound No	Wm Morrison Supermarkets plc object to the requirement for all non-residential developments over 1,000sq.m to achieve BREEAM "very good" standard or equivalent until 2013 when developments will be required to meet BREEAM "excellent" standard or equivalent.
20603	Object Legal Sound No	The policy requires compliance with other regimes. This is unnecessary and burdensome. Government's Reducing Regulation Made Simple, HM Government, December 2010 seeks to reduce the burden of regulation. Requiring pre-assessment certificates will increase costs and is unnecessary as the Building Regulations need to be complied with in any event. Not an issue which the development plan needs to address. The policy also is not consistent with the approach of BREEAM as BREEAM is regularly reviewed to ensure that Excellent is always in advance of the standards in building regulations.
20666	Object	Consider the policy pointless and propose Code 4 or BREEAM 'excellent should be sought.
20676	Object Legal Does not	DM6 and DM7 have not been developed further to reflect the importance of the issue of water conservation within the local context, in particular should require the highest standard of water efficiency (CSH5 or 6)

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	say Sound Does not say	
20686	Object  Legal Does not say  Sound No	Not justified, contrary to NPPF paras. 173-177. Propose delete
20694	Object  Legal Does not say  Sound No	Content already effectively covered by Building Regulations. Lack sufficient flexibility to be in accordance with NPPF.
20698	Object  Legal Does not say  Sound No	Content already effectively covered by Building Regulations. Lack sufficient flexibility to be in accordance with NPPF.
20704	Object  Legal Does not say	Suffolk County Council considers Policies DM7 and DM23 not to be sound in their current form. DM7 Suggest policy reflects water conservation and lifetime homes standards - Code Level 6 from 2016, see West Berkshire Core Strategy (PINS/W0340/429/5).

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Sound No	
20674	Support	Delivery against these targets should be assessed against other planning requirements and viability overall
<b>Policy DM8 – Improving Energy Efficiency and Reducing Carbon Dioxide Emissions</b>		
20554	Object  Legal No  Sound No	Does not mean anything because it's well known by professionals in the building industry that Building Control has very little effect in policing Building Regulation requirements or even in understanding the complex interpretations of ambiguous methodologies and the way that companies dodge conformity. eg. insulation and air tightness both directly relate to energy efficiency, yet little attention given to building product performance or compliance with relevant product performance test criteria/certifications. So, precisely because building control do not make ANY checks, the market is flooded with building products which under perform. The result is a system which rewards failure.
20583	Object  Legal Yes  Sound No	The principle of this policy is supported. However, given the rapid pace of technological change in this sector plus uncertainties regarding how costs will change over time, it is questioned whether the preparation of an energy statement at outline stage is worthwhile. In these circumstances, a condition requiring 'as built' documentation of the 10% CO2 reduction should suffice.
20601	Object  Legal Yes  Sound No	Policy DM8 seeks that development should go further than Policy DM7.  Policy requires developers to demonstrate that such an approach is not viable - which is fundamentally in conflict with the NPPF, para 173 which requires careful attention be paid to viability and costs in plan-making and that plans should be deliverable; and para. 174, which requires policies be subject to assessment for the likely cumulative impacts on development of all existing and proposed local standards/policies. The approach is not consistent with Government's Reducing Regulation Made Simple, which seeks to reduce the burden of regulation.
20686	Object	Not justified, effective, consistent with national policy. Propose delete.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal Does not say  Sound No	
20694	Object  Legal Does not say  Sound No	Content already effectively covered by Building Regulations. Lack sufficient flexibility to be in accordance with NPPF.
20698	Object  Legal Does not say  Sound No	Content already effectively covered by Building Regulations. Lack sufficient flexibility to be in accordance with NPPF.
20666	Support	
20674	Support	Delivery against these targets should be assessed against other planning requirements and viability overall
<b>Policy DM9 – Low and Zero Carbon Energy Generation</b>		
20555	Object  Legal Yes	Proposals for the generation of renewable energy - such as wind farms, should not be considered unless they can be proven to be at least 50% efficient or some other meaningful environmental target.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>
	Sound No	
20666	Object  Legal Does not say  Sound Does not say	Suggest in part b) add 'technology or' after 'alternative'
20702	Object  Legal Does not say  Sound No	DM9 parts a) & g) Unsound. Not consistent with NPPF paras. 98, 113 & 118.
20665	Support	Low and zero carbon energy generation systems must be encouraged.
20674	Support	Delivery against these targets should be assessed against other planning requirements and viability overall
20676	Support	
20707	Support	Detailed comments in attachment
<b>Policy DM10 – Infrastructure Services and Telecommunications Development</b>		
20622	Support	The policy to improve is welcome but it will not be sustainable if improvements to communities are not carried out in batch. Sending an engineer out to a local exchange/fibre cabinet for each random contract is in no way sustainable or economic -



<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
		especially if local or national government / tax payers are partially or wholly funding these improvements. Perhaps the delivery of the £41m roll-out project in Suffolk needs a bit more detail and efficiency savings could be made.
20690	Object  Legal Does not say  Sound No	DM10 criteria a) is considered unsound and does not comply with NPPF para. 46 which states LPA's should not 'question the need for the telecommunications system...' On that basis we request the wording is removed from the policy.
20704		Suggest a new para. 'Consideration will be given as to whether development will impact on the use of highway, with particular attention paid to the potential for restrictions on the width of the highway, to the detriment of safety, amenity and/or accessibility'
<b>Paragraph 4.4</b>		
20556	Object  Legal No  Sound No	On behalf of SHNAG, in relation to supporting paragraph 4.4. This misrepresents the status of European sites. Insufficient consideration is given to European sites other than Breckland SPA.
20565	Object  Legal Yes  Sound No	Queried the regulation referred to in the final sentence of the paragraph. Whether the intention is to refer to regulation 62 rather than 61.
<b>Policy DM11 – Impact of Development on Sites of Biodiversity and Geodiversity Importance</b>		
20557	Object	On behalf of SHNAG. The paragraph regarding international nature conservation

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal No Sound No	should reflect the wording in the Conservation of Habitats and Species Regulations 2010.
20676	Object Legal Does not say Sound Does not say	Policy DM11 &13 disappointed not to see our previous comments included.
20694	Object Legal Does not say Sound No	. NPPF para.118 sets a lower threshold of 'significant harm'.
20698	Object Legal Does not say Sound No	. NPPF para.118 sets a lower threshold of 'significant harm'.
20704	Object Legal Does not say Sound	DM11 update reference to Conservation of Habitats and Species Regs. 2012 in para 4.4 and reference to County Geodiversity Sites in para.4.5.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Does not say	
20666	Support	
20707	Support	Detailed comments in attachment
<b>Policy DM12 – Protected Species</b>		
20556	Object  Legal Does not say  Sound No	On behalf of SHNAG. This misrepresents the status of European sites. Insufficient consideration is given to European sites other than Breckland SPA.
20584	Object  Legal Does not say  Sound No	Conflicting and onerous tests within the policy give rise to uncertainty where clarity is required.
20704	Object  Legal Does not say  Sound Does not say	Alter note to 'planning and related applications'.
20666	Support	
20707	Support	Detailed comments in attachment
<b>Policy DM13 – Mitigation, Enhancement, Management and Monitoring of Biodiversity</b>		

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20567	Object  Legal Does not say  Sound No	Collection of CIL money can only be used for infrastructure, clarification required if it is the policies intent to refer to CIL money being used for monitoring of biodiversity sites.
20599	Object  Legal Does not say  Sound No	The policy requires that development will make contributions through the Community Infrastructure Levy towards biodiversity enhancements. If developers are paying a CIL, they then have no control as to how that money is spent so the policy can not be complied with.
20676	Object  Legal Does not say  Sound Does not say	Policy DM11 &13 disappointed not to see our previous comments included.
20685	Object  Legal Does not say  Sound No	On behalf of Upton Suffolk Farms Not sound, not consistent with national policy CIL Regs. 2010 and NPPF para.24. Suggest policy is amended to exclude new development of less than 100 sq m gross internal area from a contribution through CIL and to clarify that a planning obligation and /or CIL contribution will only be sought where the national tests are met.
20686	Object  Legal Does not say  Sound No	Not consistent with national policy. Proposed change amend policy to exclude new development of less than 100 sq m gross internal area from contributing to CIL to clarify that a planning obligation and/or CIL contribution will only be sought where national tests are met.
20715	Object	Suggest the Council find alternative wording that would ensure that those benefiting from

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal Does not say	the proposal are not just made up of one section of the community, or in fact the developer, but the populous at large.
	Sound Does not say	
20666	Support	
20707	Support	Detailed comments in attachment
<b>Policy DM14 – Landscape Features</b>		
20438	Object  Legal Yes  Sound No	The policy refers to amenity value, but does not provide for the process whereby this amenity value might be identified through the process of public consultation. It only refers to areas of particular landscape sensitivity as defined on the proposals map. In this respect the policy is inadequate and non dynamic.
20643	Object  Legal Yes  Sound No	Council feels that the terminology of DM14 with reference to 'gaps between settlement and their settings' is too vague with no reference to whether this includes the gap between two villages or whether this included the gap between the proposed development between Bury St Edmunds or Fornham All Saints for example.
20478	Object  Legal Does not say	We consider the Stour Valley, as defined by the project area of the Dedham Vale AONB and Stour Valley Project, should be recognised as being a Special Landscape Area. This is because of the quality of the landscape in the area and the landscape and biodiversity improvements undertaken by the Dedham Vale AONB and Stour Valley Project. The area is already supported by a management plan, supported by SEBC, including a delivery plan which is financially supported by SEBC. This area is a valued landscape by LPAs as

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Sound Does not say	outlined in para 109 of NPPF.
20694	Object  Legal Does not day  Sound No	. Too broad brush that all 'Gaps .....must be maintained'.
20698	Object  Legal Does not say  Sound No	. NPPF para.118 sets a lower threshold of 'significant harm'.
20593	Support	As with Policy DM5, this is important, and respect for Special Landscape Areas is important to the landscape amenity of Bury. However, having proposed the policy, SEBC proposes to permit an extensive incursion onto the SLA in the countryside to the SE of Bury. This is despite an intention in the Core Strategy to maintain the SLA. It is pointless to have a policy and immediately to ignore it. Furthermore the wording is so slippery that anything can be justified too accommodate the demands of developers.
20666	Support	
20707	Support	Detailed comments in attachment
<b>Policy DM15 – Safeguarding from Hazards</b>		
20666	Support	
<b>Policy DM16 – Listed Buildings</b>		
20558	Object	The policy as drafted is too prescriptive and will prevent the safeguarding of listed

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal Yes  Sound No	buildings because it will not be possible to find new uses for the buildings which require alterations or adaptations. The Council should recognise that Newmarket has listed buildings which have been empty and deteriorating for many years and are currently detracting from the economic wellbeing of the town and are visually detrimental to the streetscene and townscape. The policy should be redrafted with the aim of encouraging the sensitive refurbishment and redevelopment of listed buildings.
20678	Object  Legal Does not say  Sound Does not say	On behalf of RIBA Suffolk Wording relating to design of buildings generally or in DM16, 23 or 25 makes no specific provision for high quality architecture unlike the NPPF. Consider the wording should be 'Designs should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation'. Also no mention of Design Review, unlike the NPPF. They suggest 'Local design arrangements are in place to provide assessment and support to ensure high standards of design. Designers will be encouraged to engage with panels at an early stage in the design process. The LPA in assessing applications, will have regard to the recommendations of the design review panel'
20690	Object  Legal Does not say  Sound Does not say	DM16 criteria b) refers to 'sufficient evidence has been provided ..... before an application has been submitted'. This wording is considered to be overly restrictive and we request it is removed. Also consider the criteria that 'all proposals should include a landscape and visual assessment..... ' is excessive and may not be relevant in every circumstance. Request this wording is removed.
20666	Support	
<b>Policy DM17 – Local Heritage Assets and Buildings Protected by an Article 4 Direction</b>		

20547	Object	Lakenheath Parish Council believes that there should be greater protection for local
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<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal Yes Sound Yes	areas. Chalk, clunch and flint are the traditionally used materials in Lakenheath.
20666	Support	
<b>Policy DM18 Conservation Areas</b>		
20559	Object Legal Yes Sound No	The Council's policy is too prescriptive and too long. The Council should be trying to encourage development which will rejuvenate existing town centres and help to boost the economy. The current policy will mean that development is less likely to come forward because of the unreasonable additional obstacles and hurdles that this policy imposes. The development of many sites within conservation areas would benefit the economy, the townscape and the overall appearance of the conservation area but the development will be unlikely to happen if the policy is so negative and unreasonably prescriptive.
20660	Support	We support the generic policies contained in the document relating to the protection of the historic environment. While we do not wish to raise objections to the soundness of these generic policies, we note that the Development Management Policies could be more specific in terms of links to the evidence base for the historic environment, such as conservation area appraisals. We hope that the opportunity will be taken to consider a proactive strategy for the historic environment to support the plan, which might form additional guidance. We advocated in our earlier comments that reference should be made to heritage assets at risk in the plan policies and that these should also be referred to in the Monitoring Framework. We would recommend that this is examined further as a modification to the submitted plan.
20666	Support	
<b>Policy DM19 New Uses for Historic Buildings</b>		



<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20560	Object Legal Yes Sound No	The policy is currently too negative and prescriptive. Although community benefits are recognised the term "substantial" is open to an interpretation by officers which could be too high a test. In addition, the community benefit point is not embodied into the main part of the policy test but appears to only be a secondary consideration, the weight of which is not clear from the policy. The policy will not help to bring about the refurbishment of listed buildings if it is too negative and prescriptive.
20666	Object Legal Does not say Sound Does not say	Suggest rewording to reflect DM21 'Development will not be acceptable if it would have a material adverse impact on Registered Parks and Gardens or their settings'
20714	Object Legal Does not say Sound Does not say	No requirement for criteria a), b), or c) as these are covered in the opening of the policy. Suggest rewording for consistency. See attachment for details.
<b>Policy DM20 – Development Affecting Parks Gardens and Gardens of Special Historic or Design Interest</b>		
DM20		No comments, support or objections
<b>Policy DM21 - Archaeology</b>		

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20704	Object  Legal Does not say  Sound Does not say	DM21 Suggest adding 'adequate' before 'recording'.
20666	Support	
<b>Policy DM22 Enabling Development</b>		
20561	Object  Legal Yes  Sound No	The enabling development policy is too prescriptive and too long and negative. The policy will not encourage developers to restore listed buildings because the policy has too many obstacles to overcome, is far too difficult and time consuming to satisfy and only allows the minimum amount of development necessary to fund the restoration. The policy gives developers no incentive whatsoever. This policy will lead to listed buildings remaining empty and derelict for years to come, rather than encouraging their restoration.
20666	Object  Legal Does not say  Sound Does not say	Suggest 'At Risk' is inserted in the first line
<b>Paragraph 5.2</b>		
20667	Support	Section 5.2 Support the delivery of housing in a sustainable way. However important to note the proposed changes in the Growth and Infrastructure Bill. This will provide for a

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
		flexible approach to affordable housing numbers and the document should reflect this.
<b>Policy DM23 Residential Design</b>		
20623	Object Legal No Sound No	Taking the "best" characteristics would be more appropriate. If an area is already poorly designed it may well be distinctive, however, this is no reason to create more of the same. Emphasis on maximising development on minimal land, exploiting the opportunities etc contradicts the objectives of improving wellbeing and quality of life, improving public health and easing transport problems. The desire to minimise new road construction that underpins this approach threatens the character of historic settlements if they are (or were until recently) characterised as housing built in a linear fashion on either side of a linked road network.
20534	Object Legal No Sound No	DM23c) Utilising the characteristics of the locality to create buildings and spaces that have a strong sense of place and distinctiveness. This policy wording is not in conformity with the NPPF
20666	Object	See reasons in attachment
20678	Object Legal Does not say Sound Does not say	On behalf of RIBA Suffolk Wording relating to design of buildings generally or in DM16, 23 or 25 makes no specific provision for high quality architecture unlike the NPPF. Consider the wording should be 'Designs should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation'. Also no mention of Design Review, unlike the NPPF. They suggest 'Local design arrangements are in place to provide assessment and support to ensure high standards of design. Designers will be encouraged to engage with panels at an early stage in the design process. The LPA in assessing applications,
20694	Object Legal Does not	Points f,g,h,i and j are vague and lack clarity. Point's k,l,m and n while sensible are more appropriately dealt with under Building regulations.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	say Sound No	
20695	Object  Legal Does not say  Sound Does not say	Criteria are well thought out but suggest adding 'Cul-de-sacs should be limited in size to no more than 10 houses' in order to integrate better with the surrounding area.
20698	Object  Legal Does not say  Sound No	Points f,g,h,i and j are vague and lack clarity. Points k,l,m and n while sensible are more appropriately dealt with under Building regulations.
20704	Object  Legal Does not say  Sound No	DM23 f) & l) Unsound and should be removed or reworked. Suggested wording given see attachment.
20714	Object  Legal Does not say  Sound Does not	Seek to alter last para. to read 'Proposals for new complementary specialist accommodation and extensions to existing specialist accommodation outside Key Service Centres ....meet Criteria a),b),c),and d) above except nursing homes where only criteria a), and b), are required to be met'.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	say.	
<b>Policy DM24 Special Housing Needs</b>		
20526	Object  Legal Yes Sound No	Provision of specialist accommodation for older residents would result in a greater draw on primary care services local to developments of this nature. This would have a significant impact on the NHSS funding programme for the delivery of healthcare provision within its area and specifically within the GP catchment of such developments. It is therefore necessary that development proposals for, or that include, older persons' accommodation (including Extra Care Units) identify the healthcare impacts arising from such development and include appropriate mitigation in the form of new or improved healthcare infrastructure and/ or funding.
20702	Object  Legal Does not say  Sound No	DM24 c) Unsound. Not consistent with NPPF para. 55
20666	Support	
20439	Support	McCarthy and Stone Retirement Lifestyles LTD are pleased with the addition of the policy advocating the provision of Special Housing Needs for older persons. Given the population statistics for the area and the UK as a whole it is imperative that the needs of the aging population are taken into consideration in policy making. This policy is adequate to ensure the needs of this demographic are provided for in the next 20 years.
<b>Policy DM25 Alterations or Extensions to Dwellings, including self contained annexes and Development within the Curtilage</b>		
20647	Object  Legal No	This policy includes "Self Contained Annexes and Development within the Curtilage" and addresses several pertinent areas but all statements are predicated by the concept of an Annex.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Sound No	
20666	Object  Legal Does not say  Sound Does not say	Contradictory and unclear, see reasons
20678	Object  Legal Does not say  Sound Does not say	On behalf of RIBA Suffolk Wording relating to design of buildings generally or in DM16, 23 or 25 makes no specific provision for high quality architecture unlike the NPPF. Consider the wording should be 'Designs should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation'. Also no mention of Design Review, unlike the NPPF. They suggest 'Local design arrangements are in place to provide assessment and support to ensure high standards of design. Designers will be encouraged to engage with panels at an early stage in the design process. The LPA in assessing applications,
<b>DM26 - Extensions to Domestic Gardens within the Countryside</b>		
20648	Object  Legal No  Sound No	Though there are several situations that would be appropriate to my interest, all are restricted to development "within the countryside".
20666	Support	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>
<b>Policy DM27 – Agricultural and Essential Workers Dwellings</b>		
20666	Support	
<b>Policy DM28 Housing in the Countryside</b>		
20568	Object Legal Yes Sound No	The policy approach taken here allows for housing development in areas outside of settlement boundaries. In terms of implications of the policy for cross boundary spatial planning, the policy does not include reference to protected species. It would have been expected to have seen some cross-reference included within the policy to policies relating to the stone curlew buffer zone. Without such references, it is unclear how the policy can be sound if it could be seen to promote development within 1,500m of Breckland SPA. Therefore, in order to make the policy sound, Breckland would recommend suitable text be added
20666	Object Legal Does not say Sound Does not say	Suffolk Preservation Society see attachment
20715	Object Legal Does not say Sound Does not say	It needs to be made clear in the policy that it relates to longstanding legitimate sites. Otherwise it may encourage sites to become a nuisance factor in order to gain an alternative permission.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20571	Support	Suffolk ACRE supports this policy and in particular where a need is shown from local residents who wish to remain in the parish one or two semi detached buildings to be allowed as infill
20532	Support	If there is a plot within a hamlet which is within the bounds of the hamlet which may be able to support a dwelling with a reasonable sized garden then it should be allowed. If access to the road is without any visibility problems then one or a semi detached dwelling should be allowed taking into account building lines and character of the neighbouring properties.
20685	Sound Yes	On behalf of Upton Suffolk Farms
20692	Support	<p>Agent for numerous private and developer clients. Planning Policy for too long has ignored the largely rural character of St Edmundsbury and other similar Boroughs by only promoting development in very large villages or existing urban centres. Whilst in no way advocating isolated or sporadic development in the open countryside, a return to a Policy which acknowledges that there are indeed opportunities to develop in clusters of 10 or more units, as was the case in the past, gives a welcome opportunity for small scale development. This will in turn bring forward opportunities for local small developers and individuals to produce site specific schemes rather than the uniform bland schemes that tend to come forward on large scale sites by National House Builders.</p> <p>This Policy will effectively increase the windfall numbers that will come forward and thus take pressure off the need for larger scale development sites in the true open countryside. Other Local Authorities are acknowledging that, whilst development should go to sustainable communities, the interpretation of sustainability is changing, and there is now an acceptance that a cluster of villages, whilst not in themselves each having all the facilities, can effectively provide a cohesive sustainable unit by virtue of their mutual proximity. It would be naïve to imagine, in a rural area such as this, the large parts of the community can ever get away from dependence upon motor vehicle transport to meet their daily needs. Indeed, even in sustainable service centres, nobody would argue that most of the shopping and day to day needs are not done locally.</p>



<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
		This Policy will provide extra vitality to smaller communities and should be supported.
<b>Policy DM29 – Residential Use of Redundant Buildings in the Countryside</b>		
20702	Object  Legal Does not say  Sound No	Unduly restrictive. Not consistent with NPPF paras. 28 & 55.
20666	Support	
<b>Policy DM30 – Appropriate Employment Uses and Protection of Employment Land and Existing Businesses</b>		
20493	Object  Legal No  Sound No	On behalf of Orchard Street Investment LLP The Policy is insufficiently precise and consequently open to wide interpretation. It contradicts NPPF that all sites should be assessed on their merits. Also it implies a level of evidence that for many applicants would be burdensome or beyond their control. Furthermore contrary to NPPF para. 111 by discouraging the use of brownfield land and could therefore be considered unsustainable. Policy 28 should be revised to offer protection from loss to alternative uses of employment sites that are clearly identified on the Proposals Map
20666	Support	
20682	Support	On behalf of British Sugar Factory, Bury St. Edmunds
<b>Policy DM31 – Farm Diversification</b>		
20714	Object  Legal	Policy should include for provision of residential institutions, in particular those relating to healthcare, nursing homes and accommodation for the elderly in need of care (C2).

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Does not say  Sound Does not say	
20666	Support	
<b>Policy DM32 – Business and Domestic Equine Related Activities</b>		
20666	Object  Legal Does not say  Sound Does not say	Suggest landscape mitigation is incorporated
20679	Support	On behalf of the Newmarket Horsemen’s Group (NHG). NHG consider the Submission Consultation is broadly sound, particularly Policies DM2, DM5, DM32, and Chapter 9 which deals specifically with development relating to the horse racing industry.
<b>Policy DM33 – Re-Use or Replacement of Buildings in the Countryside</b>		
20666	Object  Legal Does not say	Suggest at i) insert at line 2 ‘small scale’ before ‘B2’

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Sound Does not say	
20702	Object  Legal Does not say  Sound No	DM33 c) & d) Not consistent with Taylor Review (2008) or CLG response (2009)
<b>Policy DM34 – Tourism Development</b>		
20707	Support	Detailed comments in attachment
<b>Policy DM35 – Proposals within the Town Centre Boundaries</b>		
<b>Paragraph 7.8</b>		
20699	Object  Legal Does not say  Sound Does not say	Para 7.8 "It is recognised that town centres cannot accommodate all shopping needs, especially those which serve local neighbourhoods or which require large floorspace..." There is no justification for this in accordance with NPPF.
<b>Paragraph 7.9</b>		
20699	Object  Legal Does not	Para. 7.9 "Proposals for main town centre uses for sites elsewhere in edge or out-of-centre locations will need to demonstrate that there will be a minimal impact, both economically and environmentally, on existing centres..." The paragraph should be amended as follows:

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	say Sound Does not say	"Proposals for main town centre uses for sites in edge or out-of-centre locations will need to demonstrate that there will be a minimal impact, both economically and environmentally, on existing centres..."  Para. 7.9 also states "...There will also need to be a clear indication that a sequential approach has been taken to identifying the site..." . The use of the term "indication" is ambiguous. For the avoidance of doubt, the paragraph should be amended as follows: "There will also need to be evidence that a sequential approach has been taken to identifying the site..."
20654	Object Legal No Sound No	Maintain objection to Newmarket Town Centre Map as per previous letter 3rd February 2012. The grounds are: 1. Inclusion of the Waitrose site within the PSA is inconsistent with the definition of PSA's in NPPF Annex2. 2. Waitrose site properly fits the definition of edge of centre sites in NPPF. 3. Inclusion of Waitrose store in PSA would constitute bad practice and could lead to poor decision making.
20666	Object Legal Does not say  Sound Does not say	Suggest adding 'development proposals for town centre uses exceeding 2500 sq m will require impact analysis to be undertaken to demonstrate are acceptable impact upon existing businesses, including headroom capacity in the local economy.
20680	Object Legal Does not say  Sound Does not	On behalf of Newmarket General Partners Ltd who own and manage a significant number of retail units in Newmarket Town Centre. Disappointed no changes have been made to Policy DM35 as set out in our letter 28th February 2012. Restaurants, cafes etc. can add substantially to the vitality and viability of a town centre. So too, to a degree, do uses falling within Use Class A2 which draw people to town centres. This is reflected in the The Portas Review (December 2011). Therefore need to take a more flexible approach. Uses falling in Use Class A1 do not require an additional level of protection.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	say	Support the Newmarket Town Centre Primary Shopping Area but it needs to include Market Square and all the shops within The Guinea Centre, which fall within the Town Centre boundary.
20699	Object  Legal Does not say  Sound Does not say	Other recommended changes: Amend Policy DM35 to comply with national policy in the NPPF in respect of schemes located outside of the Town Centres. Amend the Bury St Edmunds Town Centre Map to include the Waitrose store within the Primary Shopping Area.
<b>Policy DM36 – Protection of Local Centres</b>		
20666	Support	
<b>Policy DM37 – Public Realm Improvements</b>		
20596	Object  Legal No  Sound No	Fail to see how public realm improvements can be said to pass tests in CIL Regulation 122 and:  * be necessary to make the development acceptable; or * be directly related to the development; or * be fairly and reasonably related.
20666	Object  Legal Does not say  Sound	Suggest amend to read 'must' in place of 'should'

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Does not say	
20694	Object  Legal Does not say  Sound No	Too inflexible
20695	Object  Legal Does not say  Sound Does not say	Contributions to improvements to the public realm should also apply to Key Service Centres.
20698	Object  Legal Does not say  Sound No	Too inflexible
<b>Policy DM38 – Shop Fronts and Advertisements</b>		
20666	Object  Legal Does not say	Amend to read 'hoardings or advertisements unrelated....'

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Sound Does not say	
<b>Policy DM39 Street Trading and Street Cafes</b>		
20529	Support	While it is agreed that permitting street cafes may be desirable, this should not include the provision of space for consuming alcohol in shopping and pedestrian areas. Experience in Newmarket has demonstrated how intimidating and unattractive the behaviour of many of the customers can be.
20714	Object  Legal Does not say  Sound Does not say	There should be reference to provision for residential institutions, nursing homes and community facilities allied to those healthcare buildings/operations where there are social, economic and over-riding benefits for settlements etc.
20666	Support	
<b>Policy DM40 – Ancillary Retail Uses</b>		
20666	Object  Legal Does not say  Sound Does not say	Suggest amendment to encourage provision of grocery/convenience good sales in rural communities.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>
<b>Policy DM41 Community Facilities and Services</b>		
20589	Support	Sport England believes that this policy affords effective protection of existing community facilities (including village halls and indoor sports facilities) unless there is a genuine lack of need for the facility, or adequate replacement provision is made. Any assessment of need relating to sports facilities should be based on a robust methodology which utilises available strategic planning tools from Sport England. Future local needs requiring financial contributions from developers should be identified via a robust and up to date needs assessment - in line with advice contained within NPPF.
20644	Support	Ensure that within section 7.21 of Policy DM41 there is provision to ensure that 'appropriate public open space as formal recreation areas, informal open space and play areas' are contained within the envelope of the project and that there should be no project creep in particular within the strategic gaps between settlement boundaries.
20666	Support	
20527	Object Legal Yes Sound No	NHSS remains concerned that the policy and its supporting text, as currently drafted, is inflexible - it therefore requires amendment to enable service providers (such as NHSS) to modernise its Estate and implement plans to fulfil its statutory responsibilities without encountering unnecessary land use policy constraints. The policy is considered to be 'unjustified' in NPPF terms, as it represents an inappropriate strategy for the provision of healthcare facilities and services.
20528	Object Legal Yes Sound No	NHSS requests the inclusion of an 'additional policy' within the Development Management Document relating to Health Impact Assessments. The extent of healthcare capacity impacts (arising from residential developments of over 50 dwellings and all Use Class C2 developments) needs to be assessed at an early stage of the planning process to ensure that an appropriate level of healthcare service capacity continues to be provided for the whole community. It is recommended that for all development of this nature the submission of a Health Impact Assessment be required.
20624	Object Legal Yes	Many community facilities could already be evaluated as "not economically viable" such as nearly all community centres. They are facilities not businesses. Without the necessary investment in upgrading older community buildings, local demand will reduce therefore (a) and (b) need more thought, otherwise this policy may lead to unnecessary



<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Sound No	deterioration of local services or forced move of otherwise suitably located service.
20674	Object  Legal Does not say  Sound Does not say	Suggest elaborate the final paragraph in terms of 'local need' and specifically: how and by whom is local need identified; how is it assessed; and how is it quantified?
20694	Object  Legal Does not say  Sound No	It needs to be clear that such provision would only be required where directly related to development.
20698	Object  Legal Does not say  Sound No	It needs to be clear that such provision would only be required where directly related to development.
20702	Object  Legal Does not say  Sound No	Onerous and not consistent with aims of NPPF. Military Housing - Absence of policy is unsound.
<b>Policy DM42 Open Space, Sport and Recreational Facilities</b>		

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20437	Object  Legal Yes  Sound No	Needs to contain provision where an area is deficient in country parkland
20594	Object  Legal Yes  Sound No	Policy DM42 does not include any standards for open space provision, but states that play areas, formal sport/recreation, amenity areas and indoor sports facilities will be required in accordance with "adopted local planning authority standards..." These standards need to be set out in the development plan to provide certainty, clarity and so they can be tested.
20653	Object  Legal Does not say  Sound Does not say	Seeks clarification that the 'quantity' referred to in b) in the context of sporting pitches, refer to the number of pitches rather than the total area.
20694	Object  Legal Does not say  Sound No	As DM42 above. Final paragraph is very onerous. Object
20698	Object  Legal Does not say  Sound No	As DM42 above. Final paragraph is very onerous. Object
20590	Support	Sport England believes this policy provides a robust framework for the protection and

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
		new provision of open space, sport and recreation facilities, though it should be underpinned by a robust and up to date assessment of need as required by NPPF (Paras 73-74). We are pleased to see that the policy has been amended to give clearer guidance on the criteria for replacement facilities which now reflects Sport England's policy in relation to playing fields. The policy is now also consistent with policy guidance in NPPF (Paras 73-74).
20665	Support	Concerned about lack of pre-application consultation by St. Edmundsbury BC in the past eg Haverhill Golf Club and Haverhill's East Town Park. Want adequate and meaningful consultation at the pre-application stage with affected neighbouring authorities.
20666	Support	
20707	Support	Detailed comments in attachment
<b>Policy DM43 – Leisure Facilities</b>		
20666	Object  Legal Does not say  Sound Does not say	Propose amendment to read 'should not involve loss of a significant area of agricultural land of the highest grades (1,2,3A)
<b>Policy DM44 – Rights of Way</b>		
20707	Support	Detailed comments in attachment
<b>Policy DM45 – Transport Assessments and Travel Plan</b>		
20625	Object	One of the Suffolk Local Transport Plan Objectives was to "minimise the impact of traffic and transport infrastructure (including air quality) in market towns, villages and rural

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Legal No Sound No	areas" and the solution was to complete, in partnership with Sustrans, National Cycle routes in Suffolk. What does this Policy do to support this - in particular in the approach to the provision of cycle routes in Haverhill and the wider area between Haverhill and local / regional employment sites? It cannot be deemed that housing is to meet Regional requirements, yet Regional transport priorities and improvements not necessary!
20704	Object Legal Does not say Sound Does not say	Supporting text not consistent with NPPF. Suggest delete final sentence of para.8.2 or modify it. Insert new para.8.3 and amend final para. of policy. See suggested wording in attachment.
20666	Support	
20707	Support	Detailed comments in attachment
<b>Policy DM46 Parking standards</b>		
20548	Object Legal Yes Sound Yes	Such proposals are only workable if there is a viable public transport system/service in place. Lakenheath has no such service. Need complete rethink on public transport within Forest Heath area. Lakenheath is less than 3 miles from a station which could provide excellent links to Ely (fast becoming a major hub for all parts of the country)
20629	Object Legal No Sound No	This is no standard -unclear/unhelpful at providing solutions to growing parking problems. Policy and attitude by planning/highways towards it results in not enough parking spaces, everywhere. New development adversely affects residential amenity of existing dwellings by congesting streets and increasing competition for on street parking, furthermore pushing cars off the street and impacting on green areas. This puts traffic directly in the way of travelling public by creating unnecessary road hazards. The result is increased danger to those who wish to travel by foot or cycle,

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
		sometimes on roads which are already quite narrow and without pavements.
20645	Object  Legal Yes  Sound Yes	Request clarification as to the last paragraph.
20695	Object  Legal Does not say  Sound Does not say	Neither the policy nor the approach to it in paras. 8.4 & 8.5 is satisfactory. Current policy has led to an overflow of parked vehicles onto village roads, verges and footpaths. Need to set a new minimum parking standards for rural areas, or where public transport is poor, which is realistic.
20704	Object  Legal Does not say  Sound Does not say	Suggested additions to paras. 8.4 & 8.5 see attachment and amend policy to 'may be sought' not 'will be sought'.
20707	Support	Detailed comments in attachment
<b>Policy DM47 – Development Relating to the Horse Racing Industry</b>		
<b>Paragraph 9.2</b>		
20550	Support	Newmarket's position as the international home of horse racing gives it a unique character and status, and it is entirely right that this document recognises that.
<b>Paragraph 9.6</b>		

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20586	Object Legal Yes Sound No	The final sentence of paragraph 9.6 conflicts with Policy DM1 and paragraph 14 of the NPPF. Any planning application for sustainable development in Newmarket should be approved unless the adverse impacts would significantly and demonstrably outweigh the benefits.
20696	Object Legal No Sound Does not say	Not prepared in accordance with Statement of Community Involvement. Consultation with general public in Newmarket has been minimal. Seek clarification if sections 9 and 10 are stand alone policies or are they to be seen as fully integrated into the whole Local Plan. Regarding policies DM47, DM 48 and DM51 concerned: 1 That Planners define 'need' as 'want'. examples given. 2 That expansion of units for horse training into traditional paddock land contrary to Conservation Area Appraisal Overriding concern is simplicity of the horse racing policies effectively allowing very wide scale enterprises.
20679	Support	On behalf of the Newmarket Horsemen's Group (NHG). NHG consider the Submission Consultation is broadly sound, particularly Policies DM2, DM5, DM32, and Chapter 9 which deals specifically with development relating to the horse racing industry. In light of the importance of Policies DM47-DM51 to the operation and success of the horse racing industry centred upon Newmarket, NHG requests to be invited to the examination in support of the above policies should they be debated.
<b>Policy DM48 – Development Affecting the Horse Racing Industry</b>		
20587	Object Legal Yes Sound No	Policy DM48 conflicts with Policy DM1 and paragraph 14 of the NPPF. Any planning application for sustainable development in Newmarket should be approved unless the adverse impacts would significantly and demonstrably outweigh the benefits.
20696	Object Legal No	Not prepared in accordance with Statement of Community Involvement. Consultation with general public in Newmarket has been minimal. Seek clarification if sections 9 and 10 are stand alone policies or are they to be seen as fully integrated into the whole Local Plan.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
	Sound Does not say	Regarding policies DM47, DM 48 and DM51 concerned: 1 That Planners define 'need' as 'want'. examples given. 2 That expansion of units for horse training into traditional paddock land contrary to Conservation Area Appraisal Overriding concern is simplicity of the horse racing policies effectively allowing very wide scale enterprises.
20694	Support	
20698	Support	
<b>Policy DM49 – Re-Development of Existing Sites Relating to the Horse Racing Industry</b>		
20530	Support	This policy is vital to prevent a free for all developing regarding loss making yards and facilities. However, there may be a case to consider where the location of an existing yard has become unsuitable due to reasons of access and traffic flow for the purpose for which it was originally intended, ie a training yard.
20562	Object Legal Yes Sound No	The protectionist policies in relation to the horse racing industry have had a damaging effect on Newmarket and have prevented its normal economic growth and development. The policy should recognise that Newmarket cannot be preserved in aspic and, where there are redundant facilities, new uses should be allowed which do not have to be related to the horse racing industry. If Newmarket is too dependent upon only the horse racing industry it will be vulnerable to a significant decline if the racing industry continues to contract. The effect will be more dramatic and significant if major foreign patronage is removed
20563	Object Legal Yes Sound No	The policy should be amended to make it clear that alternative uses which have community benefits will be acceptable. Where the existing site is redundant and has been vacant for many years the "exceptional" circumstances test should not be required.
20588	Object Legal Yes Sound No	The use of the word 'previously' in the first sentence of the policy is unclear, ill-defined and hence unsound. The aim of the policy could be better achieved by changing the sentence to read "presently or last used in relation to ...".

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue</b>
20652	Object  Legal Does not say  Sound Does not say	Support the policy but recommend one minor change. In the first para. after 'will not be permitted' add '(other than for proposals contained in the plan)'
20694	Support	
20698	Support	
<b>Policy DM50 – Securing the Restoration of Horse Racing Related Assets</b>		
20660	Object  Legal Does not say  Sound Does not say	Concerned that the policies relating to the heritage of the horse riding industry in Newmarket should be beneficial to the heritage assets concerned. In this respect, we would like to discuss the proposals in policy DM50 in particular with you to ensure that we understand the likely effects, especially the potential for impacts on the setting of heritage assets. For the purposes of this consultation, we would wish to register an objection to this policy pending further discussion.
<b>Policy DM51 – Horse Walks</b>		
20696	Object  Legal No  Sound Does not	Seek clarification if sections 9 and 10 are stand alone policies or are they to be seen as fully integrated into the whole Local Plan. Regarding policies DM47, DM 48 and DM51 concerned: 1 That Planners define 'need' as 'want'. examples given. 2 That expansion of units for horse training into traditional paddock land contrary to Conservation Area Appraisal



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>
	say	Overriding concern is simplicity of the horse racing policies effectively allowing very wide scale enterprises.
<b>Policy DM52 – Rural Housing Exception Sites</b>		
20570	Support	Suffolk ACRE fully supports this policy to help maintain the sustainability of parishes by helping those with a connection to the parish move into high standard housing they can afford. This will help to maintain a work force for local small business and also provide a support network for an ageing population. The local need must be evidenced by a local housing needs survey carried out in conjunction with the parish. Smaller parishes can be encouraged to work together with neighbouring parishes to carry out joint local housing needs survey.
20666	Support	
20694	Object  Legal Does not say  Sound No	Should include provision to allow private housing as part of rural exception schemes to aid viability.
20698	Object  Legal Does not say  Sound No	Should include provision to allow private housing as part of rural exception schemes to aid viability.