

# Local Plan Working Group



Forest Heath  
District Council

<b>Title:</b>	<b>Agenda</b>
<b>Date:</b>	<b>Monday 15 February 2016</b>
<b>Time:</b>	<b>6.00 pm</b>
<b>Venue:</b>	<b>Council Chamber District Offices</b> College Heath Road Mildenhall
<b>Full Members:</b>	<p style="text-align: center;"><b>Chairman</b> Rona Burt</p> <p style="text-align: center;"><b>Vice Chairman</b> Robin Millar</p> <p><u>Conservative</u>                      David Bowman                      Christine Mason <u>Group Members</u>                      Rona Burt                                      Robin Millar (7)                                      Carol Lynch                                      Bill Sadler     Louise Marston</p> <p><u>Opposition Group</u>                      Simon Cole <u>Member (1)</u></p> <p><u>UKIP Group</u>                                      Reg Silvester <u>Member (1)</u></p>
<b>Substitutes:</b>	Named substitutes are not appointed
<b>Interests – Declaration and Restriction on Participation:</b>	Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest.
<b>Quorum:</b>	Three Members
<b>Committee administrator:</b>	<b>Sharon Turner</b> Democratic Services Officer <b>Tel:</b> 01638 719237 <b>Email:</b> <a href="mailto:sharon.turner@westsuffolk.gov.uk">sharon.turner@westsuffolk.gov.uk</a>

# Public Information



**Forest Heath**  
District Council

<b>Venue:</b>	<b>District Offices</b> College Heath Road Mildenhall Suffolk, IP28 7EY	Tel: 01638 719000 Email: <a href="mailto:democratic.services@westsuffolk.gov.uk">democratic.services@westsuffolk.gov.uk</a> Web: <a href="http://www.westsuffolk.gov.uk">www.westsuffolk.gov.uk</a>
<b>Access to agenda and reports before the meeting:</b>	Copies of the agenda and reports are open for public inspection at the above address at least five clear days before the meeting. They are also available to view on our website.	
<b>Attendance at meetings:</b>	The District Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public.	
<b>Public speaking:</b>	There is no provision for members of the public to ask questions or make statements during Local Plan Working Group meetings.	
<b>Disabled access:</b>	The public gallery is on the first floor and is accessible via stairs. There is not a lift but disabled seating is available at the back of the Council Chamber on the ground floor. Please see the Committee Administrator who will be able to help you.	
<b>Induction loop:</b>	An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter.	
<b>Recording of meetings:</b>	<p>The Council may record this meeting and permits members of the public and media to record or broadcast it as well (when the media and public are not lawfully excluded).</p> <p>Any member of the public who attends a meeting and objects to being filmed should advise the Committee Administrator who will instruct that they are not included in the filming.</p>	

## **Agenda**

### **Procedural Matters**

- |   |              |
|---|--------------|
| <b>1. Apologies for Absence</b>   |              |
| <b>2. Substitutes</b>   |              |
| <b>3. Minutes</b>   | <b>1 - 4</b> |
| <p>To confirm the minutes of the meeting held on 19 January 2016 (copy attached).</p> |              |

### **Part 1 - Public**

- |  |                  |
|--|------------------|
| <b>4. Forest Heath District Objectively Assessed Housing Need - Update</b>   | <b>5 - 70</b>    |
| <p>Report No: <b>LOP/FH/16/003</b></p>   |                  |
| <b>5. Responses to Consultation and Engagement on the Core Strategy Single Issue Review (SIR), Site Allocations Local Plan (SALP) and Draft Infrastructure Delivery Plan (IDP)</b> | <b>71 - 276</b>  |
| <p>Report No: <b>LOP/FH/16/004</b></p>   |                  |
| <b>6. Core Strategy Single Issue Review (SIR) Preferred Option - (Regulation 18) Consultation Document</b>   | <b>277 - 298</b> |
| <p>Report No: <b>LOP/FH/16/005</b></p>   |                  |
| <b>7. Date of Next Meeting</b>   |                  |
| <p>To note the date of the next meeting as Thursday 18 February 2016.</p>  |                  |

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# Local Plan Working Group



Forest Heath  
District Council

**Minutes** of a meeting of the **Local Plan Working Group** held on  
**Tuesday 19 January 2016** at **6.00 pm** at the **Council Chamber, District  
Offices**, College Heath Road, Mildenhall, IP28 7EY

Present: **Councillors**

**Chairman** Rona Burt  
**Vice Chairman** Robin Millar

David Bowman	Christine Mason
Simon Cole	Bill Sadler
Carol Lynch	Reg Silvester
Louise Marston	

**In attendance:**  
Brian Harvey

20. **Apologies for Absence**

There were no apologies for absence.

21. **Substitutes**

There were no substitutes at the meeting.

22. **Minutes**

The minutes from the meeting held on 30 June 2015 were unanimously confirmed as a correct record and signed by the Chairman.

23. **Forest Heath District Objectively Assessed Housing Need - Update (Report No LOP/FH/16/001)**

The Strategic Planning Manager explained that the Working Paper to this report had been unable to be completed in time for consideration at this meeting.

Therefore, this item would have be deferred to the next meeting of the Local Plan Working Group on 15 February 2016.

24. **Core Strategy Single Issue Review (SIR) - Sustainability Appraisal of Housing Distribution Options (Report No LOP/FH/16/002)**

The Principal Planning Officer presented this report which explained that the Core Strategy Single Issue Review (SIR) revisited the quashed parts of the 2010 Core Strategy, as well as reassessing the overall housing need/numbers to ensure compliance with the National Planning Policy Framework (NPPF).

An 'Issues and Options' (Regulation 18) consultation was completed on the Core Strategy Single Issue Review (SIR) from between July to September 2012, with a second consultation being held from between August and October 2015.

The 2015 Core Strategy SIR consultation document proposed four options for the distribution of homes across the Forest Heath district:

- *Option 1* – Focus on Mildenhall, Newmarket and Lakenheath
- *Option 2* – Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge and medium growth at Mildenhall and Newmarket
- *Option 3* – Focus on Red Lodge, with a planned extension and focus on Lakenheath and Mildenhall, with lower growth in Newmarket
- *Option 4* – Focus on Mildenhall, Newmarket and Red Lodge, with more growth in those primary villages with capacity.

The consultation document emphasised that these were alternatives for consideration and the final preferred option could be a combination of these four options, or even an approach that was entirely new and different.

364 individual consultation responses were received to the SIR consultation which, along with further evidence based work, had resulted in the identification of three distribution options, which varied slightly to those consulted on in 2015. These three options were:

- *Option 1* – Higher growth in Mildenhall and Red Lodge and Primary Villages, enabling lower growth at Newmarket
- *Option 2* – Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages
- *Option 3* – Higher growth at Mildenhall (similar to Option 1) and Newmarket (similar to Option 2), enabling lower growth at Red Lodge and Primary Villages

It was the view of Officers and the consultants appointed to undertake the Sustainability Appraisal work that, in order to progress the Core Strategy SIR and to ensure a more engaging consultation, a smaller number of options for consultation should be included in the next Core Strategy SIR document (one to be indicated at the Council's preferred option and one as an alternative option).

In order to assist with deciding on the final options for inclusion in the Core Strategy SIR document, these three options had been tested to determine whether they could deliver the required level of housing in a sustainable manner. Part of this testing had involved a high level Sustainability Appraisal (SA) to ensure they were acceptable in terms of meeting the overall SA objectives. This SA summary was attached as Working Paper 1 to the report.

The SA conclusions to the three distribution options stated that the sustainability impact of the options varied between higher levels of growth in Newmarket and Mildenhall and to a lesser extent, the amount of growth directed to Red Lodge. Therefore, there was little potential to differentiate between the options in terms of the majority of objectives and there was no clear most sustainable option. There was also the ongoing uncertainty around the issuing and content of the Hatchfield Farm decision, which meant that it would be inappropriate, at this time, to consult on two options which proposed high growth in Newmarket.

The outcomes of the Sustainability Appraisal would inform the preparation of the Core Strategy Single Issue Review (CS SIR) Preferred Options document. This draft would be considered by the Working Group at their meeting on 15 February 2016.

The Council was currently finalising work on the Core Strategy SIR consultation document, with a view to selecting a preferred option and a non-preferred options. The results of this early SA work, would inform the Council's decision, along with other evidence based considerations.

Following this meeting, the final Core Strategy SIR document and Site Allocations Local Plan (SALP) would be prepared and presented in full to the following meetings of the Working Group:

- 15 February 2016 - Single Issue Review document and Officer responses to all of the comments received to the Single Issue Review and Site Allocations document
- 18 February 2016 - Site Allocations Local Plan

These documents would then be taken to Cabinet on 1 March 2016 to receive approval to go out to consultation. The consultation was planned to take place from the end of March 2016 to the end of May 2016. Comments received during this next consultation would be considered and brought back to the Working Group, before being fed into the final consultations for both the Site Allocations and Core Strategy Single Issue Review in later Summer/Autumn 2016. Submission of the document for Independent Examination would follow in December 2016.

Whilst considering this report, Members expressed concerns over the costs to Council, as a result of the High Court Challenge on the 2010 Core Strategy. Therefore, Members requested for the cost of the commissioning of the Sustainability Appraisal (as set out in Working Paper 1 to this report), along with the other costs to the Council, in relation to the preparation of the Local Plan documents, which had emanated as a result of the High Court challenge.

Officers confirmed that these costs would be brought back to the meeting on 18 February 2016.

With the vote being unanimous, it was

**RESOLVED:**

That:-

1. The progress made on the Core Strategy Single Issue Review (CS SIR) Sustainability Appraisal, specifically the outcomes for the housing distribution options be noted.
2. The costs borne by the Council, as a result of the High Court challenge on the 2010 Core Strategy, be provided to the meeting of the Local Plan Working Group on 18 February 2016.

**25. Date of Next Meetings**

It was noted that the dates of the next meetings of the Local Plan Working Group would be held as follows (all meetings to be held at 6.00 pm):

Monday 15 February 2016

Thursday 18 February 2016

The Meeting concluded at 6.45 pm

**Signed by:**

**Chairman**

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# Local Plan Working Group



**Forest Heath**  
District Council

<b>Title of Report:</b>	<b>Forest Heath District Objectively Assessed Housing Need - Update</b>	
<b>Report No:</b>	<b>LOP/FH/16/003</b>	
<b>Report to and date:</b>	<b>Local Plan Working Group</b>	19 January 2016
<b>Portfolio holder:</b>	James Waters Portfolio Holder for Planning and Growth <b>Tel:</b> 07771 621038 <b>Email:</b> <a href="mailto:james.waters@forest-heath.gov.uk">james.waters@forest-heath.gov.uk</a>	
<b>Lead officer:</b>	Marie Smith Strategic Planning Manager <b>Tel:</b> 01638 719260 <b>Email:</b> <a href="mailto:marie.smith@westsuffolk.gov.uk">marie.smith@westsuffolk.gov.uk</a>	
<b>Purpose of report:</b>	<p>To report the changed position regarding the 'all homes' need and affordable need to members in advance of the next steps in the plan preparation process.</p> <p>To note the outcomes of the report which updates the previous 2013 objectively assessed housing need of 7,000 dwellings, over the plan period from 2011 to 2031, to 6,800 over the same period. It is therefore appropriate to plan for the updated figure.</p>	
<b>Recommendation:</b>	<p><b>It is <u>RECOMMENDED</u> that the Local Plan Working Group:</b></p> <p>(1) <b>Note the updated evidence which has amended Forest Heath District Council's objectively assessed housing need (OAN) to 6800 dwellings over the plan period from 2011 to 2031. This updates the previously assessed need of 7000 dwellings in 2013 and, therefore, it is appropriate to plan for the updated figure.</b></p> <p>(2) <b>The updated OAN of 6800 dwellings should be used to assess the Council's five year land supply.</b></p>	

<p><b>Key Decision:</b></p> <p><i>(Check the appropriate box and delete all those that <b>do not</b> apply.)</i></p>	<p><i>Is this a Key Decision and, if so, under which definition?</i></p> <p>Yes, it is a Key Decision - <input type="checkbox"/></p> <p>No, it is not a Key Decision - <input checked="" type="checkbox"/></p>
<p><b>Consultation:</b></p>	<ul style="list-style-type: none"> <li>• In accordance with Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, the Council's Statement of Community Involvement and Local Development Scheme.</li> </ul>
<p><b>Alternative option(s):</b></p>	<ul style="list-style-type: none"> <li>• Options for progressing the SIR and SSA Local Plan Documents were considered by the Local Plan Working Group on 16 October 2014.</li> <li>• Housing Options Paper was considered and endorsed by the Local Plan Working Group on 22 April 2015.</li> <li>• CS SIR and SSA Local Plan Documents and the accompanying SEA/SA and supporting documents were considered by the Local Plan Working Group on 30 June 2015 and agreed by Cabinet on 14 July 2015 for consultation.</li> </ul>
<p><b>Implications:</b></p>	
<p><i>Are there any <b>financial</b> implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any <b>staffing</b> implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any <b>ICT</b> implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any <b>legal and/or policy</b> implications? If yes, please give details</i></p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>There is a requirement for Local Planning Authorities to produce a Local Plan and to undertake consultation during its preparation under the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011 and the Town and Country Planning (Local Planning) Regulations 2012.</p>
<p><i>Are there any <b>equality</b> implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><b>Risk/opportunity assessment:</b></p>	<p>The Local Development Scheme includes a risk assessment of issues that could affect the Councils ability to deliver the Local Plan(s) in accordance with the programme. Actions to manage the risks have also been identified. Failure to produce an up to date Local Plan programme may result in an unsound Plan or</p>

		legal challenge.	
<b>Risk area</b>	<b>Inherent level of risk</b> (before controls)	<b>Controls</b>	<b>Residual risk</b> (after controls)
Significant public opposition	High	Local Plan documents have the potential to be highly contentious. Whilst every effort will be made to build cross-community consensus, there is a high risk of significant public opposition.	Medium
Loss of Staff	Medium	The structure and staffing levels within the Place Shaping Team will be constantly monitored and reviewed to ensure that the appropriate level of skills and resources are maintained.	Low
Financial shortfall	Medium	In the short/medium term, the Council has allocated funds through its Financial Services Planning process to allow for the preparation of the Local Plan. In the longer term, should costs increase, a review of the financial allocation will be required.	Low
Changing Political Priorities	Medium	Proposals are discussed with Members of all parties via a variety of means, the Local Plan Working Group etc.). This helps build consensus and reduces the likelihood of wholesale change of direction from local politicians.	Low
Legal Challenge	High	As a measure of last resort anyone may issue a legal challenge within six week of adoption of the Local Plan. Officers will continue to seek to ensure that local plan documents are prepared within the legal framework in order to reduce the risk of successful legal challenge.	Medium
<b>Ward(s) affected:</b>		All Wards in the District.	
<b>Background papers:</b> (all background papers are to be published on the website and a link included)		<p>Forest Heath Core Strategy Development Plan Document (May 2010).  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm</a></p> <p>Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2012.  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/Core-strategy-policy-CS7-single-issue-review-1.pdf">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/Core-strategy-policy-CS7-single-issue-review-1.pdf</a>)</p>	

	Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2015 ( <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm</a> )
<b>Documents attached:</b>	<b>Working Paper 1:</b> Forest Heath District Market Signals and Objectively Assessed Housing Need (January 2016)

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## **1. Key issues and reasons for recommendation(s)**

### **1.1 Background**

National planning policy and guidance makes clear that local planning authorities should undertake their own assessment of their housing needs and set an appropriate target to meet these needs.

The Strategic Housing Market Assessment (SHMA) was prepared in 2013 and indicated an objectively assessed need (OAN) for 350 dwellings per annum for Forest Heath in the period 2011-2031, or 7000 homes in total. This figure was used to inform the two options for the overall housing provision planned for at the 2<sup>nd</sup> Issues and Options stage of the SIR and SALP.

Following changes in national policy and guidance and other local circumstances including the planned closure of the RAF Mildenhall airbase, an update of the objectively assessed housing need was commissioned. A number of other authorities within the Cambridge sub region, our housing market area have been required to update their OAN. South Cambridgeshire and Cambridge City undertook a joint update of their OAN in 2015. This was followed by an update for Forest Heath, East Cambridgeshire and St Edmundsbury Council's. All OAN updates were prepared by Cambridge Research Group (CRG), who undertook the 2011 and 2013 assessments, ensuring a consistent approach.

For Forest Heath the OAN update (Jan 2016) indicates a revised 'all homes' need for 6800 dwellings, 200 dwellings lower than the previous SHMA indicated covering the same time period 2011-2031. This assessment was supported by evidence prepared by Peter Brett Associates (PBA) on behalf of the council which considered the impact of market signals on both the objectively assessed housing need and whether an uplift is justified in setting a housing provision target to meet more of the affordable housing need. The report can be read in full at working paper 1 (please note: Officers are fact checking the report, once finalised, the report will be issued in advance of the LPWG).

The OAN will inform the setting of an appropriate housing provision target for replacement policy CS7 of the SIR. The process of assessing needs and setting a housing provision target is clearly set out in the PBA report. The PBA assessment concludes that an uplift of 5% is an appropriate adjustment, giving rise to an overall OAN of 6800 dwellings. Any further uplift for market signals would not be appropriate to address more of the affordable need.

The affordable housing need for 2014 for the district has been confirmed at 2638 dwellings, a small alteration on the figure reported at the Issue and Options stage, which reported at 2703. This slight reduction in need when read alongside the reduced 'all homes' housing need of 6800 will not materially alter the overall balance between affordable need and 'all homes' need previously reported at

the Issues and Options stage.

## **2. Outcome**

- 2.1 Officers wish to report the changed position regarding the 'all homes' need and affordable need to members in advance of the next steps in the plan preparation process. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure.

Following this meeting of the Local Plan Working Group, the final Core Strategy SIR document and Site Allocations Local Plan (SALP) 3<sup>rd</sup> Issues and Options documents will be prepared. The evidence based studies prepared by Cambridge Research Group and Peter Brett Associates will be used to inform the setting of an appropriate housing target provision for replacement policy CS7 of the SIR.

The updated OAN of 6800 dwellings should be used to assess the Council's five year land supply.

Forest Heath  
Objectively Assessed Housing Need  
January 2016

A report by Cambridgeshire County Council Research Group to support Forest Heath District Council in objectively assessing and evidencing development needs for housing, both market and affordable.

### Executive Summary

1. *“The primary purpose of identifying need is to identify the future quantity of housing needed, including a breakdown by type, tenure and size.”*

Source: Planning Practice Guidance Reference ID: 2a-002-20140306

2. The purpose of this report is to identify the future quantity of housing needed, from 2011 to 2031.
3. The overall housing figure that has been identified is 6,800 dwellings (340 dwellings per annum).
4. This housing figure results from applying the household representative rates from the latest (CLG 2012) household projections to the population forecast from the latest (ONS 2012) population projections, converting the households to dwellings using the Census 2011 ratio of households to dwellings, and adjusting upwards the number of dwellings by 5%.
5. The purpose of this report is also to consider the total need for affordable housing in the context of the overall housing figure.
6. The total need for affordable housing that has been calculated is 2,638 houses for 2011-2031.
7. Table 1 provides a summary of the identified change in population, jobs and dwellings numbers for the period 2011 to 2031.

**Table 1: Identified population, jobs and dwellings change from 2011 to 2031 for Forest Heath**

District	Population	Jobs	Dwellings	Ratio of new jobs to new dwellings
Forest Heath	17,000	5,200	6,800	0.8

8. The overall housing figure that has been identified is 5% higher than the starting point (CLG 2012) estimate of 6,450 dwellings (5,940 households).

### Contents

- 1 Introduction
- 2 The approach to assessing need
- 3 The scope of this assessment
- 4 Assessing housing need
- 5 Conclusion

## 1 Introduction

9. Forest Heath District Council (FHDC) is preparing a Single Issue Review (SIR) of Core Strategy policy CS7, which will set the overall housing provision and its distribution across the district, and in addition a Site Allocations Local Plan (SALP) document.

10. National planning policy and guidance makes clear that local planning authorities should undertake an assessment of their housing needs working with the other local authorities in the relevant housing market area.

11. The Strategic Housing Market Assessment (SHMA) was prepared in 2011 and updated in 2013 for the Cambridge housing market area (HMA), including Forest Heath. It indicated an objectively assessed need (OAN) for 350 dwellings per annum for Forest Heath in the period 2011 to 2031, or 7,000 homes in total. This figure was used to inform the two options for the overall housing provision at the 2nd Issues and Options stage of the SIR, which was consulted upon in the summer of 2015. The Council is in the process of preparing a 3rd Issues and Options stage document for consultation in March 2016.

12. A number of changes in national and local circumstances have prompted the need for the OAN to be updated in Forest Heath, notably the following:

- (a) Changes in national planning policy and guidance;
- (b) The release of new CLG household projections and EEFM forecasts in early 2015;
- (c) A number of other authorities within the Cambridge housing market area have been required to update their OAN, and there is a need for a consistent approach;
- (d) Local circumstances including the planned closure of the RAF airbase at Mildenhall;
- (e) The need to update the OAN for Forest Heath to ensure a robust evidence base to inform the local plan process, particularly given the need of the SIR to set an appropriate housing provision target, which also requires an update on the jobs assessment in line with housing need, and an update on the affordable housing need assessment.

13. Cambridge City Council and South Cambridgeshire District Council undertook a joint update of their OAN in 2015. Updates are now being commissioned for Forest Heath, St Edmundsbury and East Cambridgeshire District Councils. All OAN updates are being undertaken by Cambridgeshire Research Group (CRG), who undertook the 2011 and 2013 assessments, ensuring a consistent approach.

14. Peter Brett Associates (PBA) has been commissioned on behalf of FHDC to consider the impact of market signals on the objectively assessed housing need in Forest Heath. The results of this work feed into this OAN update.

15. This assessment covers the period 2011 to 2031, which is the same time period as the SHMA (2013 version), but is updated to reflect changes in national and local circumstances.

16. Thus, this report

- (i) provides an updated OAN for FHDC 'building on the existing evidence base' (as per national planning practice (PPG) guidance), but also
- (ii) takes the opportunity to use any updated other evidence, such as national forecasts and projections, in that process.

## 2 The approach to assessing need

17. To ensure that the assessment findings are transparently prepared, this report follows closely the standard methodology set out in the national planning practice guidance. Using this approach, the overall assessment of need is an objective assessment of need based on facts and unbiased evidence.

18. The assessment is thorough but proportionate, building where possible on existing information sources outlined within the guidance. The report uses existing available evidence and reports as much as possible, but also takes the opportunity to use the latest available evidence, including the latest household projections, ensuring that the assessment is informed by the latest available information.

19. The report builds upon, and feeds into, the existing evidence base of partner local authorities in the housing market area, in line with the duty to cooperate, through the Strategic Housing Market Assessment partnership, which is a partnership of all seven local planning authorities in the Cambridge housing market area.

## 3 The scope of this assessment

### Introduction

20. The objectively assessed need for housing in Forest Heath is assessed in relation to the Cambridge housing market area, which of course includes Forest Heath.

21. *"A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap."*

Source: Planning Practice Guidance Reference ID: 2a-010-20140306

22. The Cambridge housing market area - defined as Cambridge, East Cambridgeshire, Fenland, Forest Heath, Huntingdonshire, South Cambridgeshire and St Edmundsbury council areas - is an established assessment area.

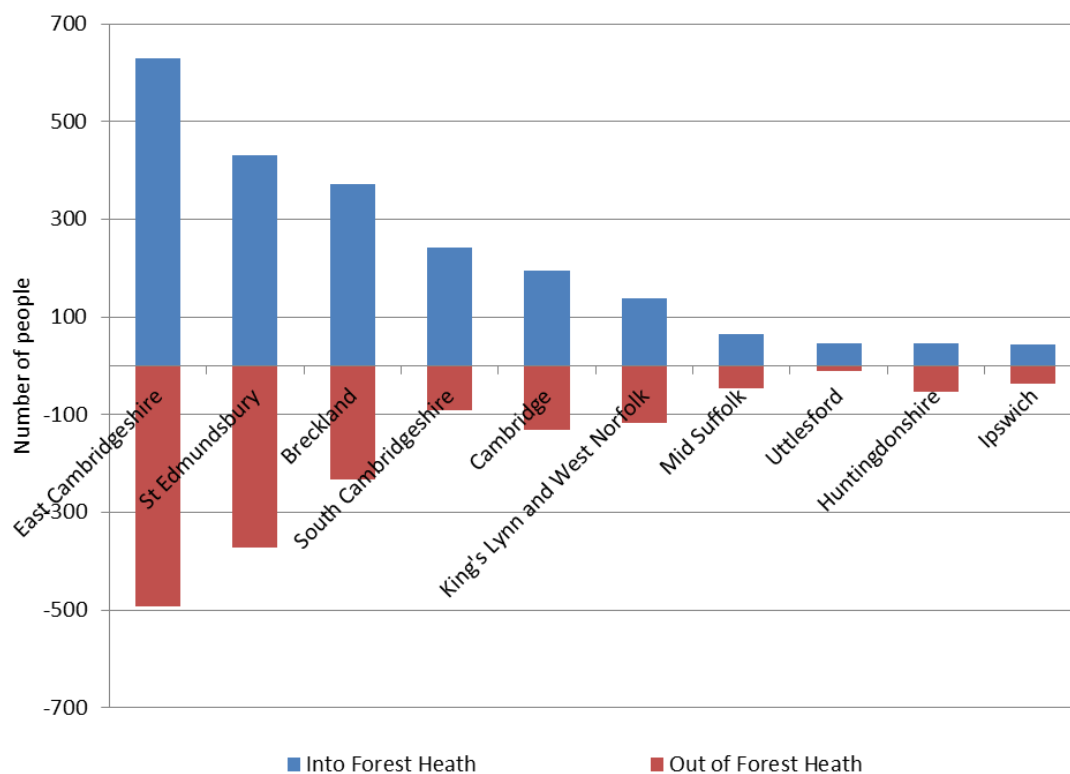
23. In the following sections, we provide up-to-date supporting evidence for this assessment area, using the latest migration and commuting data.

## Analysis of migration flow patterns

24. Migration flows and housing search patterns reflect preferences and the trade-offs made when choosing housing with different characteristics. The following analysis of migration flow patterns helps to identify these relationships and the extent to which people move house within this area. The findings identify the areas within which a relatively high proportion of household moves (typically 70%) are contained. This excludes long distance moves outside the UK (e.g. those due to a change of lifestyle or retirement), reflecting the fact that most people move relatively short distances due to connections to families, friends, jobs, and schools.

25. Figure 1 below shows cross-boundary migration to and from Forest Heath in the year preceding the 2011 Census.

**Figure 1: Cross-boundary migration to and from Forest Heath in 2010-2011 (Census 2011)**



26. Figure 1 above shows the top ten origins and destinations of people who moved into and out of Forest Heath between March 2010 and March 2011 (i.e. people who had a different address one year before the Census). The top ten includes five of the six other districts in the Cambridge housing market area (East Cambridgeshire, St Edmundsbury, South Cambridgeshire, Cambridge and Huntingdonshire). The top six also includes King's Lynn and West Norfolk, and Breckland.

27. In addition to these cross-boundary moves, 3,546 people moved house within Forest Heath, which represents 50% of the total 'in' moves, and 58% of the total 'out' moves. Including house

moves within Forest Heath, the total number of 'in' moves was 7,107, and the total number of 'out' moves was 6,068. The total number of 'in' moves from the housing market area (including Forest Heath) was 5,117, and the total number of 'out' moves to the housing market area (including Forest Heath) was 4,706. 72% of all 'in' moves and 78% of all 'out' moves were therefore contained within the housing market area, which exceeds the PPG's 70% threshold for identifying a housing market area.

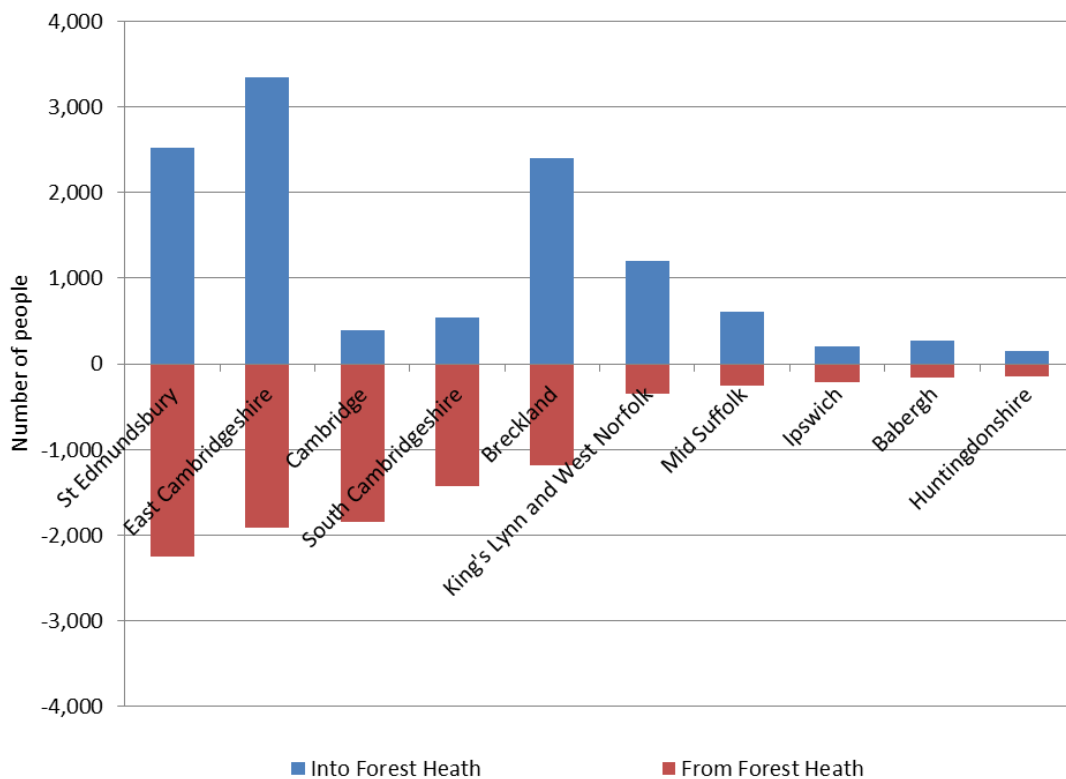
### Analysis of commuting flow patterns

28. Travel to work areas can provide information about commuting flows and the spatial structure of the labour market, which will influence household price and location. They can also provide information about the areas within which people move without changing other aspects of their lives (e.g. work or service use).

29. The following analysis of commuting flow patterns helps to identify the key functional linkages between places where people in this area live and work. Maps 1 and 2 overleaf show the places where people who live in Forest Heath work (Map 1), and where people who work in Forest Heath live (Map 2).

30. Figure 2 below shows cross-boundary commuting to and from Forest Heath at the time of the 2011 Census.

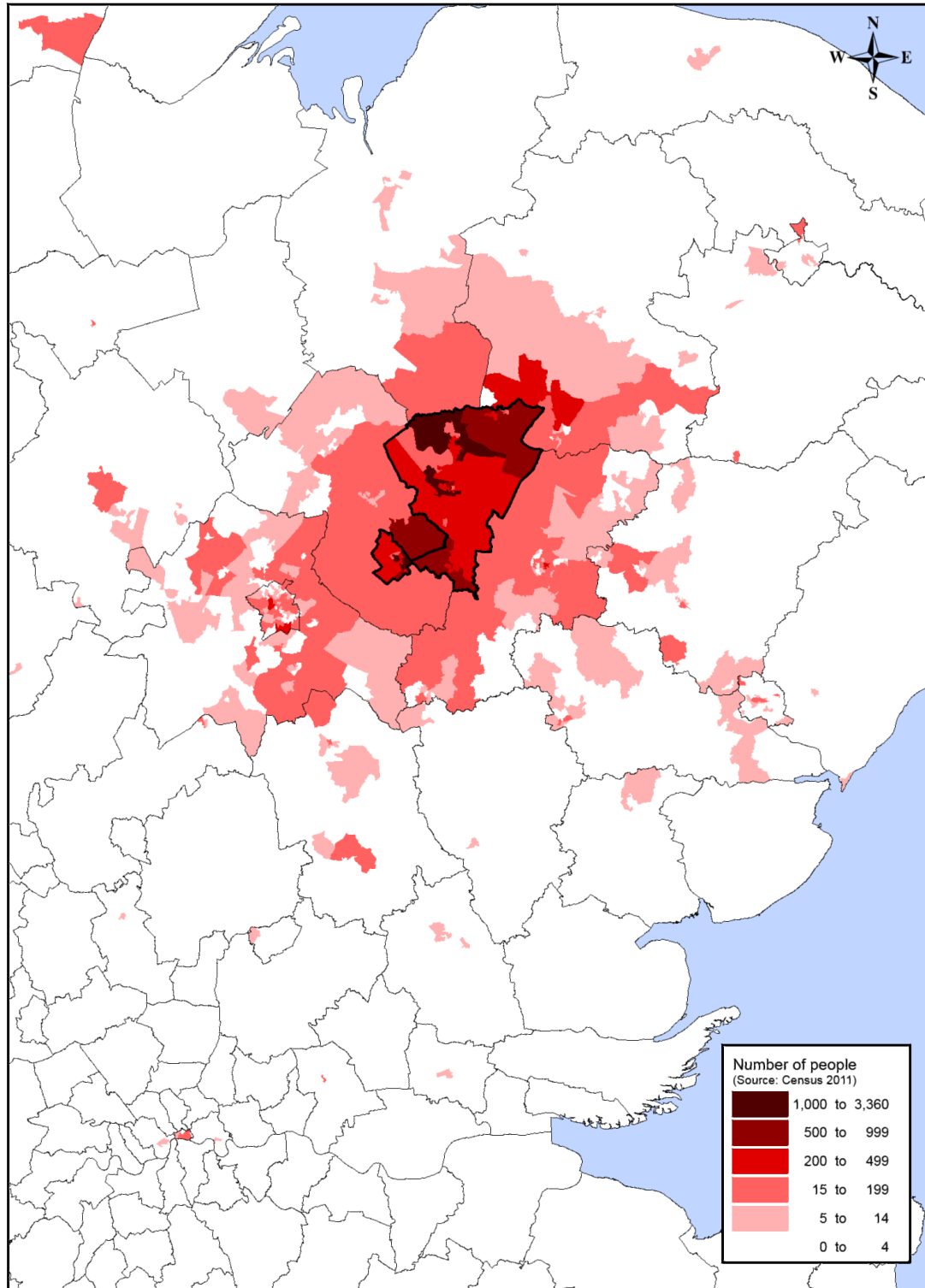
**Figure 2: Cross-boundary commuting to and from Forest Heath in 2011 (Census 2011)**





Map 1: Area of workplace of the working population of Forest Heath (Census 2011)

Area of workplace of the working population of Forest Heath

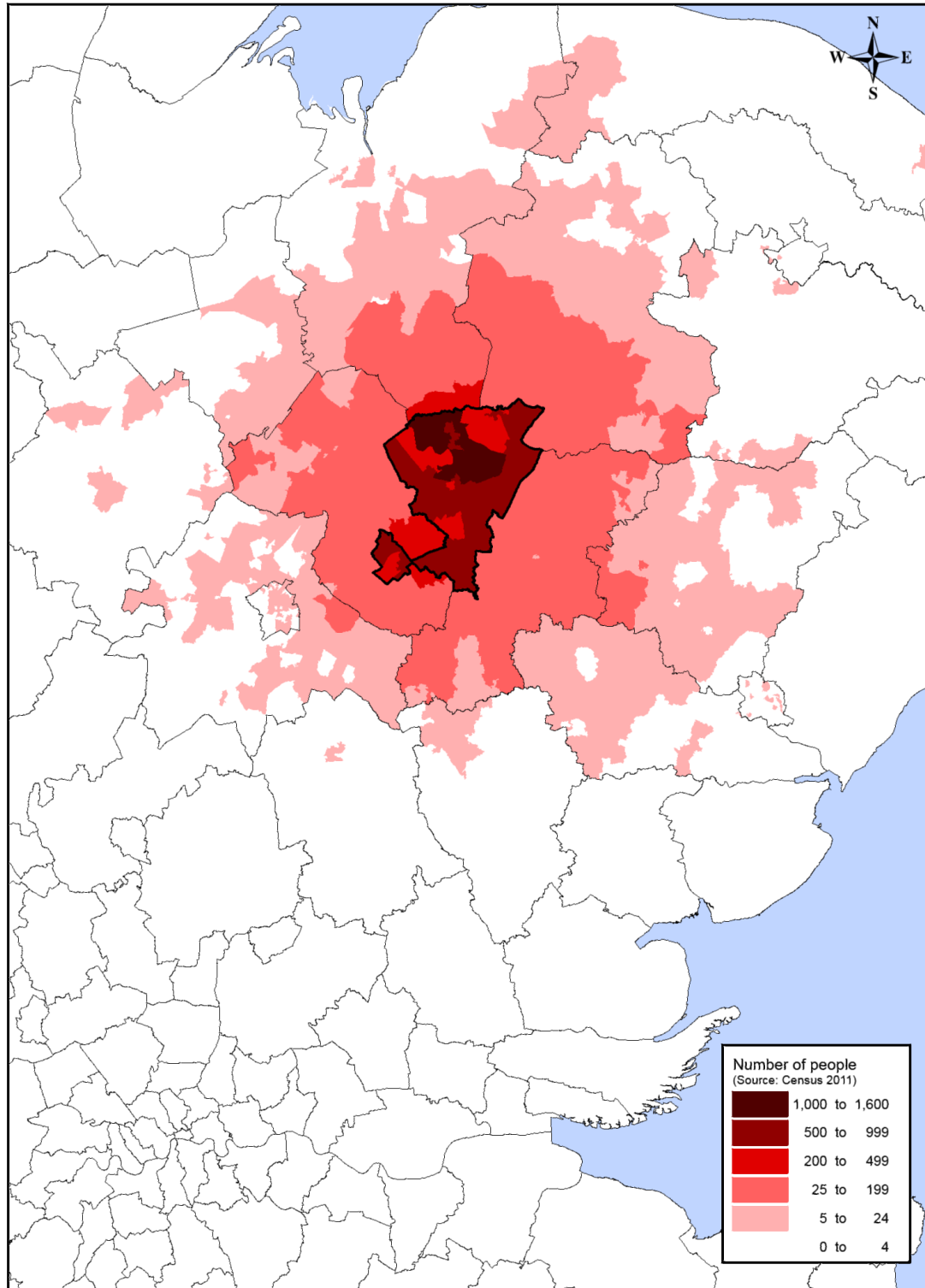


Scale at A4 - 1:700,000

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Map 2: Area of residence of the workplace population of Forest Heath (Census 2011)

Area of residence of the workplace population of Forest Heath



Scale at A4 - 1:700,000

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31. Figure 2 above shows the top ten origins and destinations of people who travelled into and from Forest Heath to work in March 2011. The top ten includes five of the six other districts in the Cambridge housing market area (St Edmundsbury, East Cambridgeshire, Cambridge, South Cambridgeshire and Huntingdonshire), as well as King's Lynn and West Norfolk, and Breckland, which were also in the top six origins and destinations of people who moved house in 2010-2011. This analysis suggests the Cambridge housing market area overlaps the housing market areas of other districts within the Greater Cambridge Greater Peterborough and New Anglia local enterprise partnership (LEP) areas.

32. In addition to these cross-boundary flows, 20,060 people live and work within Forest Heath, including 3,146 people who work at or from home, and 2,631 people with no fixed place of work. 61% of people who work in Forest Heath live in Forest Heath (Map 2), while 63% of people who live in Forest Heath work in Forest Heath (Map 1), with 24% of Forest Heath's employed residents working elsewhere in the Cambridge housing market area (Figure 2).

### **Other contextual data**

33. Forest Heath is in West Suffolk, next to the boundaries of Norfolk and Cambridgeshire. It is a predominantly rural area with three market towns, Newmarket, Mildenhall and Brandon and a number of villages and small hamlets. The district has good connections to London and Norwich along the A11 and to the Midlands, Ipswich and the Port of Felixstowe along the A14.

34. The Strategic Housing Market Assessment (2013 version) provides further contextual information, including area profiles for all seven districts in the Cambridge housing market area.

### **Conclusion**

35. Analysis of the latest migration and commuting data provides up-to-date supporting evidence for the established definition of the Cambridge housing market area.

### 4.1 The starting point for establishing the need for housing

#### Introduction

36. In this report, household projections published by the Department for Communities and Local Government (CLG) provide the starting point estimate of overall housing need.

37. The 2012-2037 Household Projections were published on 27 February 2015, and are the most up-to-date estimate of future household growth.

38. The household projections are produced by applying projected household representative rates to the population projections published by the Office for National Statistics (ONS). Projected household representative rates are based on trends observed in Census and Labour Force Survey data.

39. The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends.

40. Table 2 below shows the household projection-based estimate of housing need for the period 2011 to 2031.

**Table 2: Household projection-based estimate of housing need**

Source of estimated/projected population	Population 2011	Population			Population 2031	Population 2011-2031	Households 2011-2031	Dwellings 2011-2031
		2012	2013	2014				
ONS 2012	60,040	60,740	61,700*	62,690*	76,220*	16,180	5,940	6,450

\*The population figures for 2013, 2014 and 2031 are the projected population figures published by ONS on 29 May 2014.

41. Table 2 above shows the starting point estimate of 5,940 households (6,450 dwellings) for the period 2011 to 2031. This starting point estimate results from applying the household representative rates from the latest (2012-based) household projections published by CLG ("CLG 2012") to the latest (2012-based) sub-national population projections published by ONS ("ONS 2012").

42. We convert the households to dwellings using the Census 2011 ratio of households to dwellings from Census 2011 Table KS401EW. This ratio is 25,376 households to 27,547 dwellings for Forest Heath, which means the required number of dwellings is 8.56% higher than the projected increase in households.

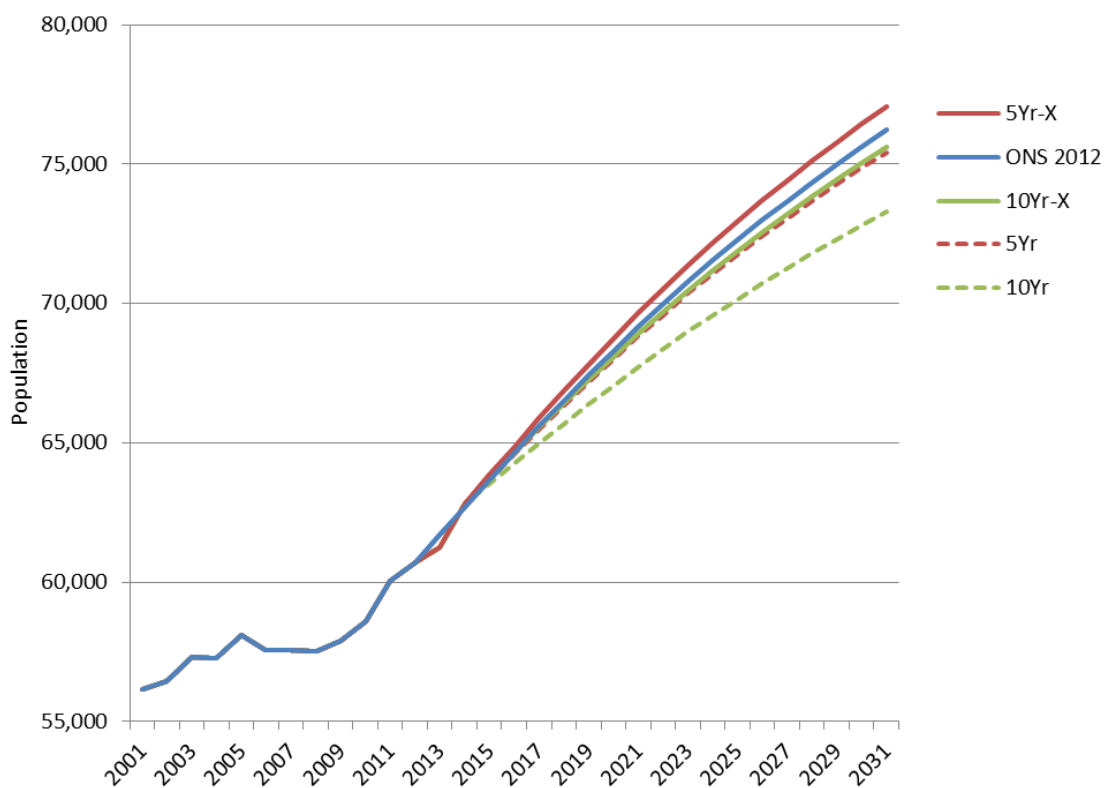
43. To assess what adjustment, if any, this household projection-based estimate of housing need requires, the following sections provide sensitivity testing based on alternative assumptions in relation to the underlying demographic projections and household formation rates.

### Underlying demographic projections

44. To test the sensitivity of the underlying demographic projections to alternative migration assumptions, we provide alternative demographic projections based on 5-year and 10-year population trends.

45. Figure 3 below shows the official (ONS 2012) population projection for Forest Heath, two alternative population projections based on 5-year migration trends (5Yr and 5Yr-X), and two alternative population projections based on 10-year migration trends (10Yr and 10Yr-X).

**Figure 3: Official and alternative demographic projections (ONS and CRG)**



We acknowledge the support of Edge Analytics and the use of POPGROUP technology in the production of the alternative demographic projections.

46. *“A five year historical period is a typical time-frame from which migration ‘trend’ assumptions are derived (this is consistent with the ONS official methodology). However, given the unprecedented economic change that has occurred since 2008, it is important to give due consideration to an extended historical time period for assumption derivation.”*

Source: [Greater Essex Demographic Forecasts 2013-2037 Phase 7 Main Report May 2015 \(Edge Analytics\) \(www.uttlesford.gov.uk/article/2417/Essex-Guidance-Documents\)](http://www.uttlesford.gov.uk/article/2417/Essex-Guidance-Documents)

47. ONS projections are trend-based, which means assumptions for future levels of births, deaths and migration are based on observed levels. The 2007 to 2012 period is used as the basis for the ONS 2012 projections. Hence, any underlying trends evident in this period, such as low or high rates of annual house-building, will influence the future projections up to 2031.

48. Figure 3 above shows four alternative demographic projections based upon the latest demographic evidence. We take the opportunity to incorporate the latest available information, which includes the 2014 mid-year population estimate and its accompanying components of change (births, deaths and migration) for the 2013 to 2014 period.

- For all four alternative projections, the fertility and mortality rates from 2014 onwards are taken from the official (ONS 2012) projection for Forest Heath.
- For the 5Yr and 5Yr-X projections, the migration assumptions from 2014 onwards are based on a 5-year historical time frame (2009 to 2014).
- For the 10Yr and 10Yr-X projections, the migration assumptions from 2014 onwards are based on a 10-year historical time frame (2004 to 2014).
- For the 5Yr and 10Yr projections, we assume that the ‘unattributable population change’ (UPC) for the 2001 to 2011 historical period is associated with the mis-estimation of international migration (as this is the component with the greatest uncertainty associated with its estimation).
- For the 5Yr-X and 10Yr-X projections, we exclude the UPC from the international migration assumptions (this is consistent with the ONS official methodology).

49. As Figure 3 shows, the 5Yr-X and 10Yr-X projections - which exclude UPC - suggest population growth rates that are similar to the official (ONS 2012) projection for Forest Heath, reflecting longer-term net migration assumptions in the ONS 2012 projection that are similar to recent historical levels.

50. Table 3 below shows the most recent demographic evidence.

**Table 3: 2012-based projected population figures and more recent mid-year population estimates**

Source of estimated/projected population	Population 2011	Population			Population 2031	Population 2011-2031	Households 2011-2031	Dwellings 2011-2031
		2012	2013	2014				
ONS 2012	60,040	60,740	61,700	62,690	76,220	16,180	5,940	6,450
Mid-year estimates	60,040	60,740	61,240*	62,810*				

\*The population figures for 2013 and 2014 are the estimated population figures published by ONS on 25 June 2015.

51. As Table 3 above shows, recent historical population levels have been similar to projected levels. In addition to natural change and net migration, the change in the population level between 2012

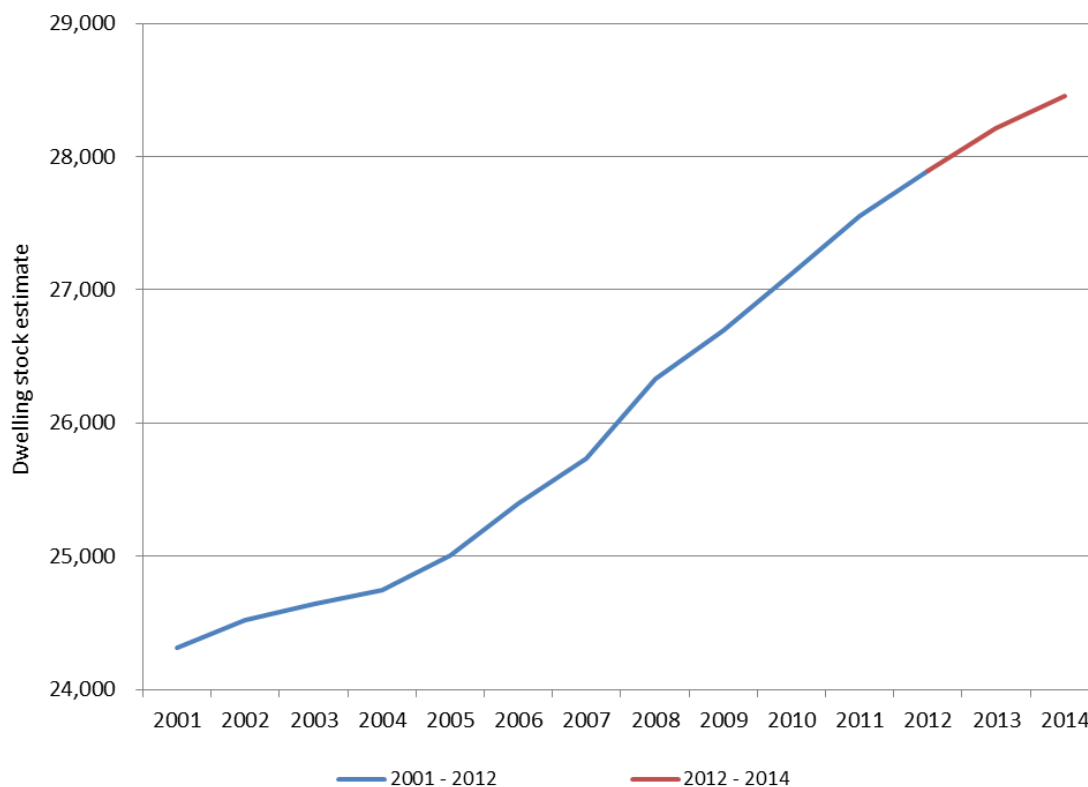
and 2013 includes an estimated change in the armed forces population of minus 664 people. The change in the population level between 2013 and 2014 includes an estimated change in the armed forces population of plus 852 people. The Office for National Statistics uses data supplied by the United States Air Force to estimate the mid-year to mid-year change in the armed forces population.

52. Net migration over the last five years (2009 to 2014) has been slightly higher than over the 2007 to 2012 period. The 5Yr-X projection (which is consistent with the ONS 2012 methodology) therefore projects a slightly higher population growth rate than the ONS 2012 projection. The 10Yr-X projection (which uses an extended historical time period) conversely projects a slightly lower rate of growth than the official projection, mainly reflecting the lower growth rate of the 2004 to 2007 period.

53. The alternative projections provide sensitivity testing in relation to the official projection. Any underlying trends evident in the 2012 to 2014 period, such as any under delivery of housing, will influence the alternative future projections up to 2031.

54. Figure 4 below shows the most recent dwelling stock estimates.

**Figure 4: Dwelling stock estimates for Forest Heath (CLG)**



55. As Figure 4 above shows, recent annual increases in housing numbers have been lower than previous housing growth rates, with a particularly low rate of growth in 2013/14.

56. Excluding the change in the armed forces population, the higher population growth rate in 2012/13 (net migration of plus 646 people and natural change of plus 526 people) reflects the higher housing growth rate in 2012/13 (plus 320 dwellings); and the lower population growth rate in 2013/14 (net migration of plus 247 people and natural change of plus 470 people) reflects the lower housing growth rate in 2013/14 (plus 250 dwellings).

57. If the projected population growth rates were not similar to the official (ONS 2012) projection, the 5Yr-X and 10Yr-X projections would provide evidence for an adjustment to the ONS 2012 projection. Also, if low rates of annual house-building were evident in the 2007 to 2012 period, the ONS 2012 projection would require adjustment (only one year of lower growth is evident in this period - in 2008/09 - which follows the national trend). However, as the projected population growth rates are very similar to the ONS 2012 projection, and low rates of annual house-building are not evident in the 2007 to 2012 period, the 5Yr-X and 10Yr-X projections do not provide any evidence for an adjustment to the ONS 2012 projection.

### **Unattributable population change and armed forces population**

58. The 5Yr-X and 10Yr-X projections imply higher rates of population growth than the equivalent projections that include UPC in the historical data; a reflection of the adjustment that was allocated to the population to account for the over-count between the 2001 and 2011 Censuses.

59. As Figure 3 shows, the 5Yr and 10Yr projections - which include UPC - suggest population growth rates that are lower than the official (ONS 2012) projection for Forest Heath.

60. UPC has been identified by ONS in each local authority district in England and Wales to close the gap between the population estimated for 2011 after the census of that year and estimates of the 2001 population, and of births, deaths and migration each year between 2001 and 2011. ONS believes its estimates are the best possible, but acknowledges that extra change did occur (or less change, in the case of Forest Heath) which it is unable to attribute to a specific cause. ONS provides the amount of this extra change in its population accounts for 2001 to 2011.

61. The total UPC amount in Forest Heath for 2001 to 2011 is minus 2,413. The amount is negative to correct for the over-estimates of the population by ONS each year between 2001 and 2011.

62. In an analysis of the likely causes of this discrepancy, ONS concludes:

*“Armed forces personnel in Forest Heath account for 10-20% of total population. Armed forces may explain some of the difference between rolled forward and census based estimates.”*

Source: Understanding the causes of discrepancies between rolled forward and census based mid-year estimates for 2011 (ONS)

63. Armed forces personnel can be significant contributors to discrepancies between census based and rolled forward estimates for a number of reasons. Armed forces personnel can account for a large proportion of the population in some local authorities, most notably Forest Heath, and the



numbers of armed forces personnel can change rapidly between years as old bases are closed and the structure of the armed forces changes.

64. In some local authorities, it is assumed that UPC is most likely associated with the mis-estimation of international migration, and so UPC is included in the derivation of future migration assumptions, as is the case in the '5Yr' and '10Yr' projections above. However, in Forest Heath, ONS considers the armed forces population to be a likely cause of this discrepancy. We therefore believe it is more appropriate not to include the UPC in the derivation of future migration assumptions for Forest Heath, and so the 5Yr and 10Yr projections do not provide any evidence for an adjustment to the ONS 2012 projection.

65. With the planned closure of the RAF airbase at Mildenhall, and relocation of some personnel to the airbase at Lakenheath, the armed forces population is likely to continue to be a source of uncertainty in future population estimates and forecasts. Any reduction in the household population in Mildenhall is likely to be partly offset by an increase in Lakenheath, although some reduction overall is likely. While this reduction in armed forces personnel suggests a reduction in the district's population, the change in the local population structure (e.g. increase in birth rates) that may result from a supply of houses vacated by the armed forces personnel may result in an increase in the district's population. The impact of the planned closure of the RAF airbase at Mildenhall therefore remains too uncertain to make a confident adjustment to the official demographic projection, and so we therefore believe it is more appropriate not to make such an adjustment.

66. All four alternative demographic projections therefore provide no evidence for an adjustment to the underlying (ONS 2012) demographic projections.

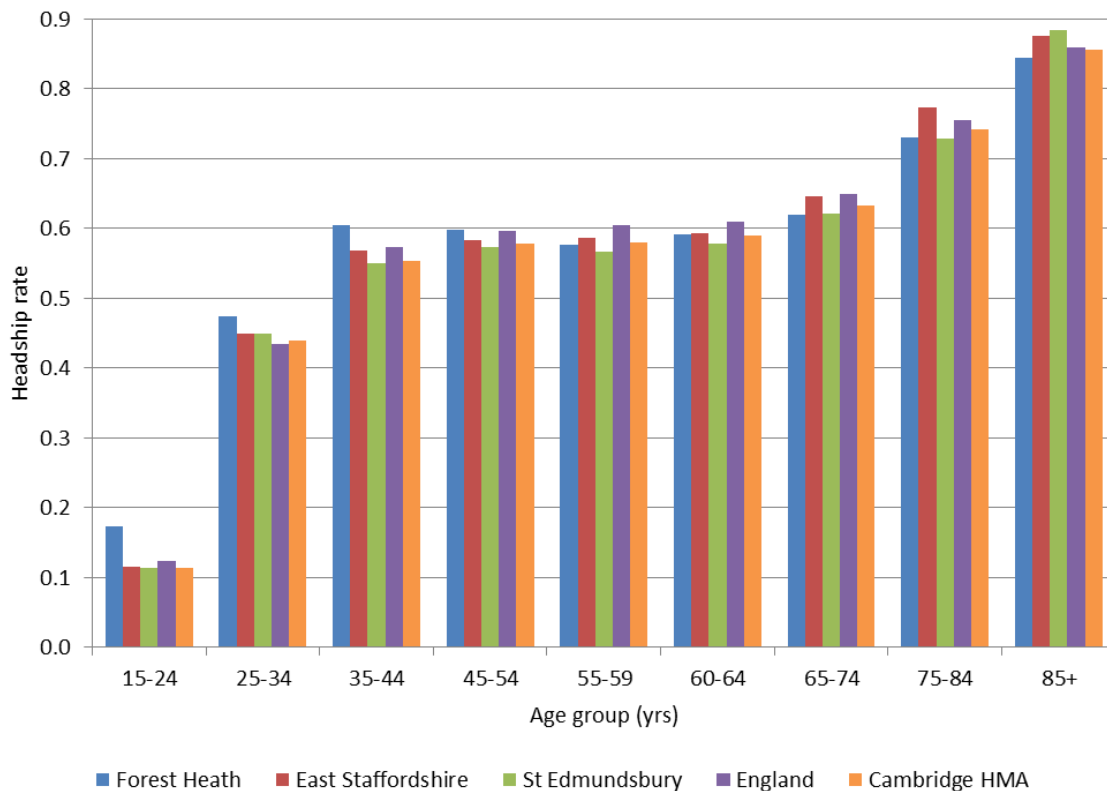
### **Household formation rates**

67. To test the extent to which household formation rates are or have been constrained by supply, we consider alternative household formation rates based on 2012-based and 2008-based official household projections. The 2012-based official household projections (CLG 2012) are the most up-to-date estimate of future household growth. The 2008-based projections (CLG 2008) in general assume higher rates of household formation than the CLG 2012 projections.

68. In this section, we compare the CLG 2012 household formation rates for Forest Heath to the national rates, the HMA rates, and the rates for Forest Heath's 'most similar' areas. We propose to consider alternative, 2008-based, household formation rates for any age groups, especially any younger age groups, where the local rates are generally lower, and therefore constrained, relative to the England and other rates, in 2012. 2012 is the base year for the latest official projections. The CLG 2012 household formation rates therefore do not require adjustment to reflect the lower rates of housing growth in the 2012 to 2014 period (Figure 4).

69. Figure 5 overleaf compares the CLG 2012 household formation rates for Forest Heath to the England, HMA and 'similar area' rates. We use CIPFA's 'nearest neighbours' model to identify East Staffordshire and St Edmundsbury as two of the 'most similar' areas to Forest Heath.

**Figure 5: Household formation rates in 2012 (CLG)**



70. As Figure 5 above shows, the CLG 2012 household formation rates for Forest Heath are generally higher than, or similar to, the national and other rates for all age groups, especially the younger age groups, in 2012, providing no evidence for an adjustment to the CLG 2012 household formation rates.

**Latest population estimates**

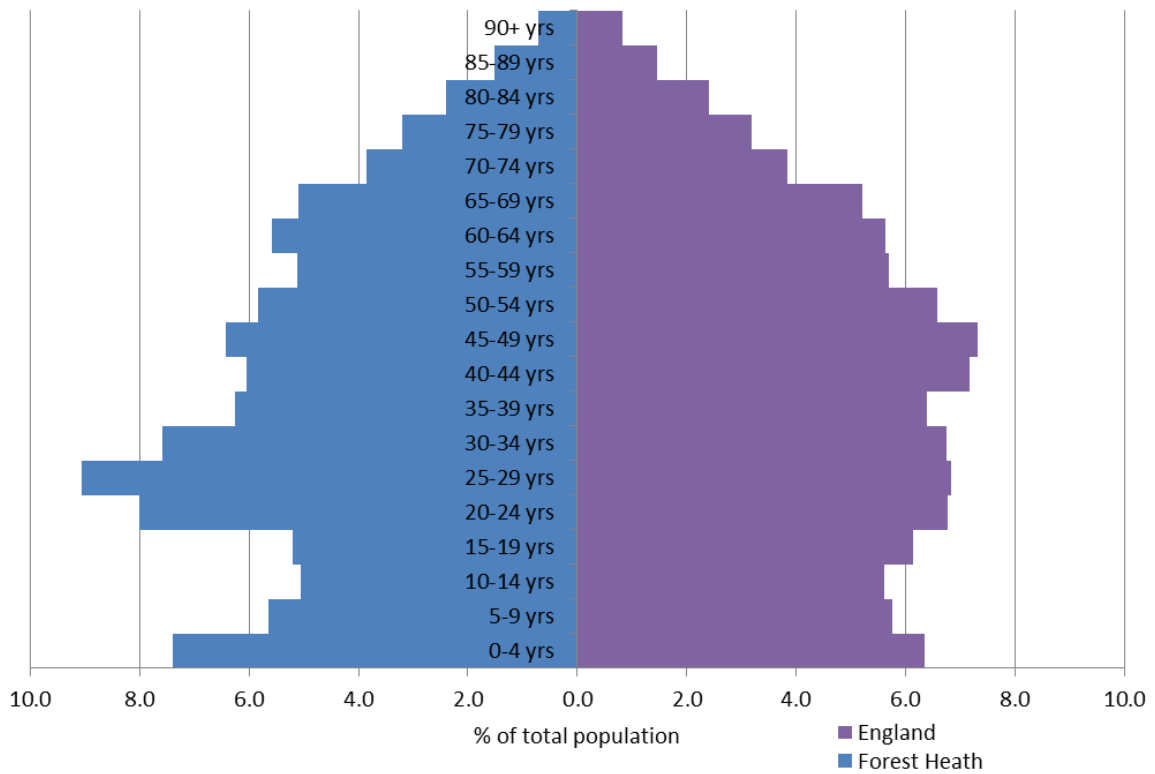
71. In the preceding sections, we take account of the most recent demographic evidence including the latest (mid-2014) Office for National Statistics population estimates. We take account of the latest migration trends (Figure 3). In this section, we take account of the latest birth rates and the local population structure.

72. Figure 6 overleaf shows the estimated age structure of the populations of Forest Heath and England in 2012 and 2014.

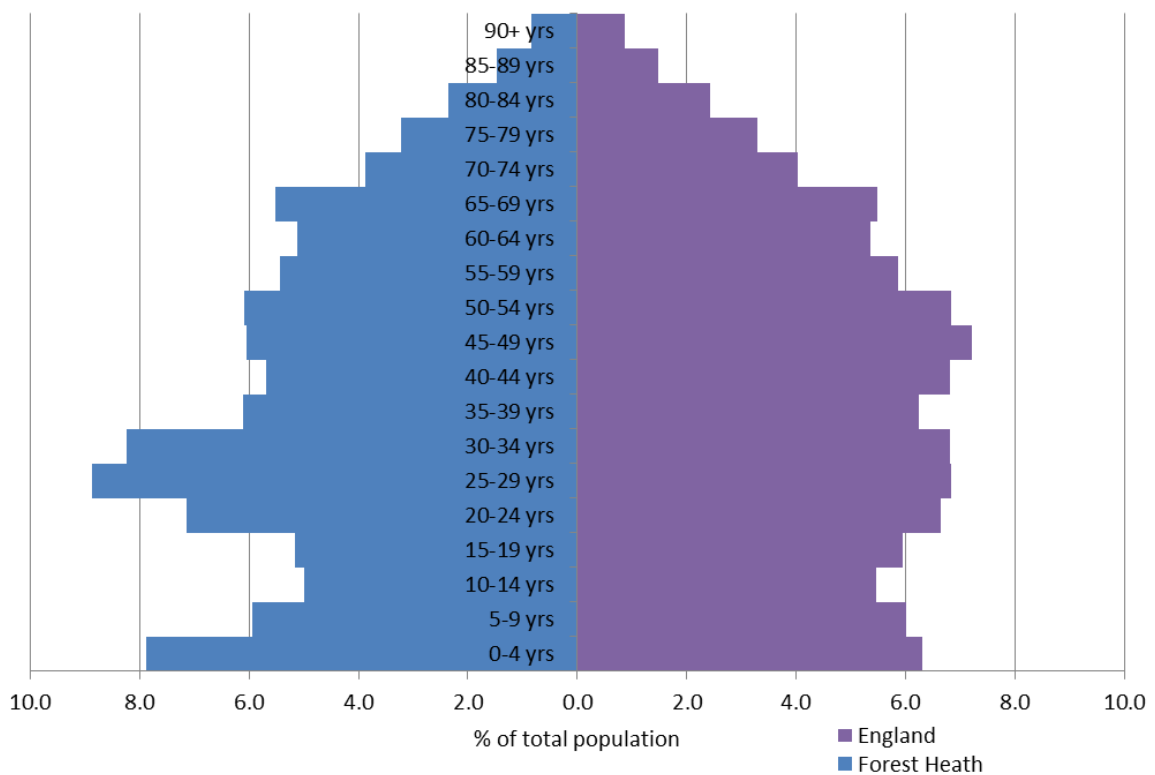
73. As Figure 6 shows, the proportion of Forest Heath’s population aged 0 to 4 is above the England average both in 2012 and in 2014. The estimated proportion of Forest Heath’s population aged 0 to 4 is 7.4% in 2012 and 7.9% in 2014, which is above the projected proportion of 7.7% for 2014.

74. As Figure 5 shows, the household formation rates of Forest Heath’s younger age groups are above the England rates in 2012, with the district’s higher birth rates a reflection of these higher household formation rates.

**Figure 6(a): Population age structure in 2012 (ONS)**



**Figure 6(b): Population age structure in 2014 (ONS)**



75. The high proportion of children in Forest Heath’s household population explains the unique trend in Forest Heath’s average household size:

*The CLG 2012 household projections indicate a rise in household population of 16,000 and a rise in households of 6,000 in Forest Heath between 2011 and 2031. These projections indicate a rise in average household size, which is unique to Forest Heath (with the exception of the Isles of Scilly).*

76. The increase in average household size in Forest Heath over the projection period reflects the projected population structure, with the children in the household population not expected to form households until at least 15 years of age.

77. As Figure 6(a) shows, high birth rates in Forest Heath were evident in the 2007 to 2012 period. Local evidence suggests the particularly high number of births in the 2012 to 2014 period is likely to reflect the release onto the market of a large number of houses vacated by United States Air Force (USAF) personnel ([www.lakenheath.af.mil/news/story.asp?id=123338879](http://www.lakenheath.af.mil/news/story.asp?id=123338879)).

78. As high birth rates were evident in the 2007 to 2012 period, and the recent particularly high rates reflect a particular release of housing, the latest population estimates do not provide any evidence for an adjustment to the ONS 2012 projection.

79. Taking account of sensitivity testing and the latest demographic estimates, we therefore find no evidence for an adjustment to the underlying (ONS 2012) demographic projections, or the CLG 2012 household formation rates.

80. Table 4 below shows the official household projection-based estimate of housing need for the period 2011 to 2031. This housing figure results from applying the CLG 2012 household representative rates to the ONS 2012 population projection, and converting the households to dwellings using the Census 2011 ratio of households to dwellings. As Table 4 shows, the official household projection-based estimate of housing need, which requires no adjustment, is 6,450 dwellings.

**Table 4: Official (unadjusted) household projection-based estimate of housing need**

Source of estimated/projected population	Population 2011	Population 2031	Population 2011-2031	Households 2011-2031	Dwellings 2011-2031
ONS 2012	60,040	76,220	16,180	5,940	6,450

**Conclusion: What adjustment, if any, does the household projection-based estimate of housing need require?**

81. Taking account of sensitivity testing and the latest demographic estimates, the starting point (CLG 2012) estimate of 6,450 dwellings (5,940 households) requires no adjustment for the period 2011 to 2031.

## 4.2 Taking employment trends into account

### Introduction

82. If the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns and could reduce the resilience of local businesses.

83. The housing need number suggested by household projections (the starting point) may require adjustment to provide a labour force supply in the housing market area that is not less than the projected jobs growth.

84. Having regard to the growth of the working age population in the housing market area, we make an assessment of the likely change in job numbers based on past trends and economic forecasts. We take account of the most recent economic evidence including the latest (“EEFM 2014”) East of England Forecasting Model employment forecasts.

85. A labour force supply that is less than the projected jobs growth will require upward adjustment to planned housing numbers compared to ones based solely on household projections.

86. If an upward adjustment is required, we will set this adjustment at a level that provides an increase in the labour force in the housing market area that is not less than the projected jobs growth. We will use the EEFM 2014 forecasts to tell us the growth of the working age population in Forest Heath that aligns with the housing market area’s projected jobs growth.

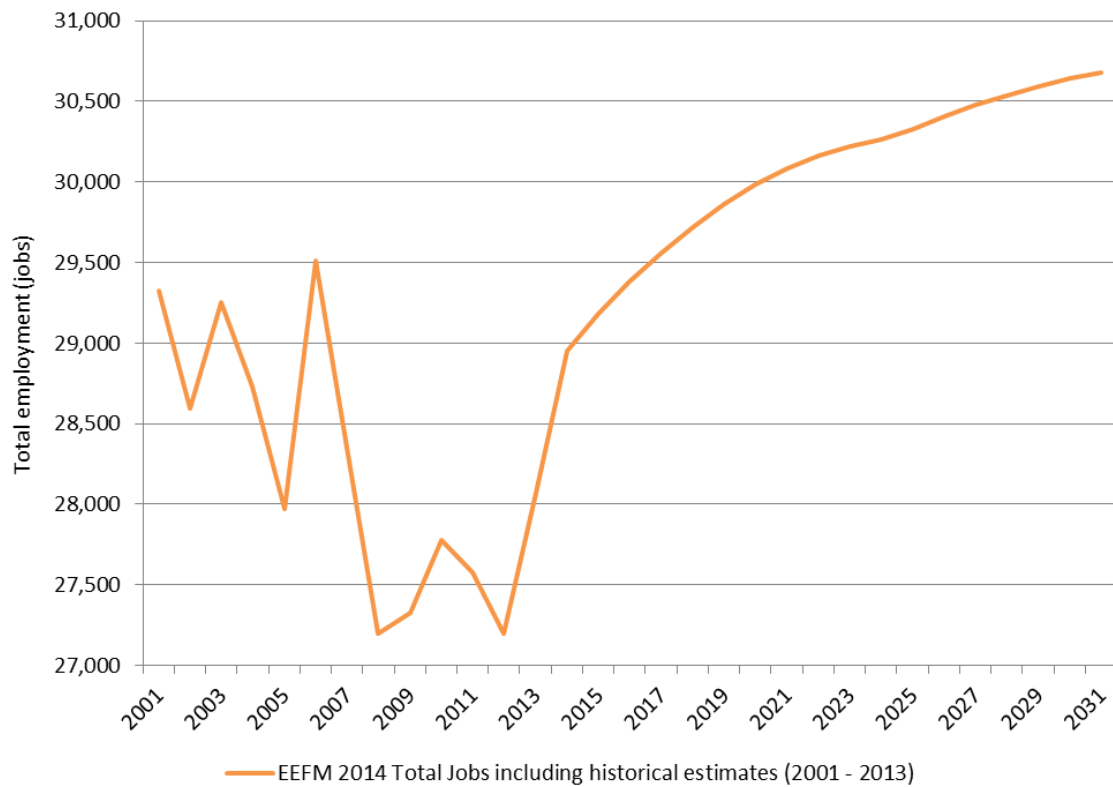
87. The East of England Forecasting Model ([www.cambridgeshireinsight.org.uk/EEFM](http://www.cambridgeshireinsight.org.uk/EEFM)) provides economic-based forecasts for population, employment and housing over the next twenty years across the LEP areas which are either wholly or partly in the East of England, including the Greater Cambridge Greater Peterborough and New Anglia LEP areas. It was set up and is owned by the East of England Local Government Association and is a vital tool for local authorities, LEPs and other organisations who are planning for the delivery of public services, infrastructure, housing and economic development in their area.

88. While we take the opportunity to use the latest available information, we build on the existing evidence base of the local authorities in the housing market area, and overlapping housing market areas, by using the same source of economic forecasts as the local enterprise partnerships, and the Strategic Housing Market Assessment (2013 version).

### Latest economic forecasts

89. Figure 7 below shows the latest (EEFM 2014) baseline employment forecast for Forest Heath, and also shows the past trends of the 2001 to 2013 period. The projected increase in employment for the 2011 to 2031 period is 3,100 jobs, with a projected increase in ‘full-time equivalent’ (FTE) employment of 3,030 jobs.

**Figure 7: Total employment (jobs) forecast for Forest Heath (EEFM)**

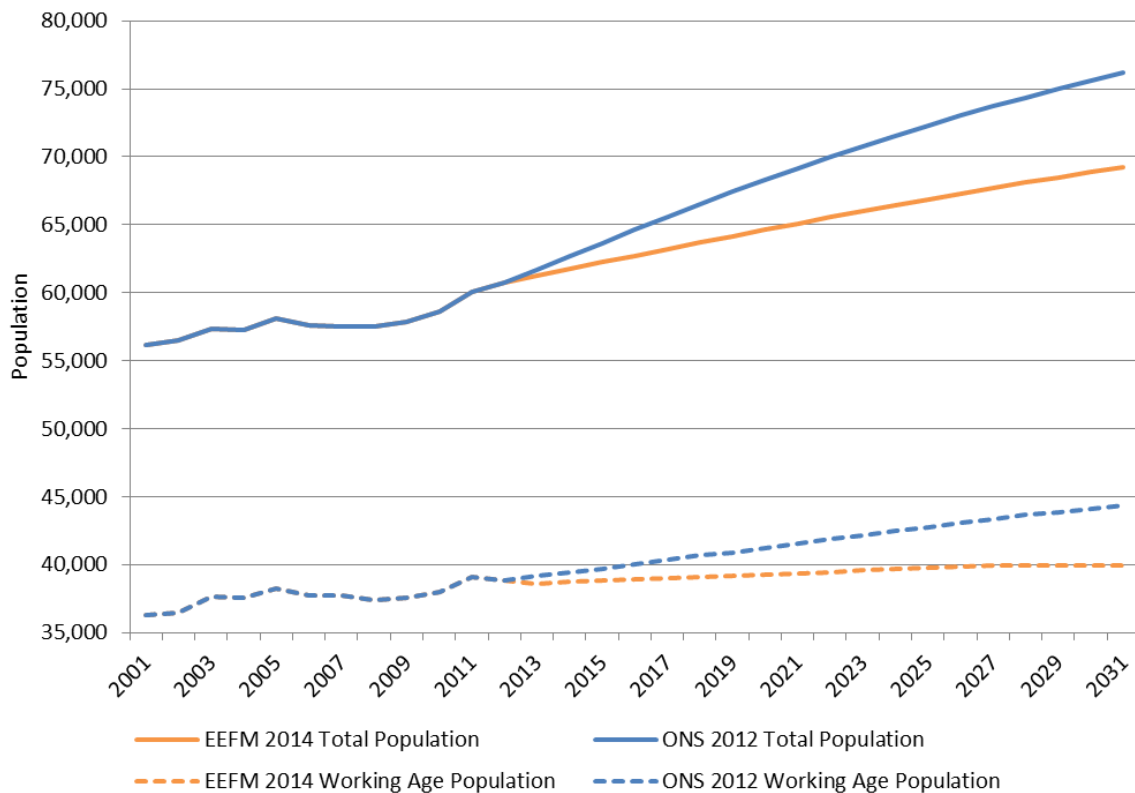


90. The forecasts generated by the EEFM provide a particularly robust evidence base because they are integrated, consistent with wider economic trends and are up to date, being revised every year. Particularly important is the integration of economic and demographic circumstances, and the consistency between all LA areas within the region and in neighbouring regions. Within the EEFM, migration (and hence population and housing) depends on the path of employment. At the same time employment in certain industries simultaneously depends on population, as is the case in the real world.

91. Figure 8 below shows the EEFM 2014 total and working age population forecasts for Forest Heath, and compares the economic-based forecasts to the official (ONS 2012) demographic projections.

92. As Figure 8 shows, the economic-based forecasts suggest population growth rates that are lower than the official (ONS 2012) projections for Forest Heath, reflecting the area’s trend-based economic prospects. The economic-based projected population increase for the 2011 to 2031 period is 9,180 people, with a working age population increase of just 870 people. Around 70% of the increase in employed residents from this increase in population aligns with the increase in the workplace population (jobs growth) in Forest Heath, and around 30% aligns with an increase in net out-commuting, meeting the housing needs of the housing market area.

**Figure 8: Official and economic-based total and working age population forecasts (ONS and EEFM)**



93. Having regard to the growth of the working age population in the housing market area, the latest employment trends therefore provide no clear evidence for an upward adjustment to the housing need number suggested by household projections. In the following section, we provide an adjusted household projection for Forest Heath that is fully consistent with the EEFM’s population and employment forecasts.

**Economic-based household projection**

94. The two consistent approaches for projecting housing demand that take into account the EEFM’s employment forecasts are:

- (a) To use the EEFM’s own “demand for dwellings” forecast for Forest Heath;
- (b) To derive a variant household projection using the EEFM’s population forecast - and population structure - using a system such as POPGROUP.

95. Some systems (including POPGROUP) allow users to derive alternative population projections, and then household projections, using the EEFM’s employment forecasts, but, because the employment and population forecasts are inter-linked in the EEFM forecasts, it is not consistent to use the EEFM employment forecasts with alternative population assumptions. The employment and population forecasts are calculated simultaneously within the EEFM. Alternative population assumptions would lead to different employment forecasts and vice versa.

96. In this section, using POPGROUP’s Derived Forecast model, we derive an economic-based household projection for Forest Heath that is fully consistent with the EEFM’s population and employment forecasts.

97. Jobs growth is linked to population growth in the EEFM, and vice versa, so our household projection for Forest Heath is consistent with the EEFM’s employment forecasts, so long as our household formation rate assumptions are applied to the EEFM’s own population forecast.

98. As the national planning practice guidance endorses CLG’s 2012-based household projections as the most up-to-date estimate of future household growth, and as we find no evidence for an adjustment to these rates in Section 4.1 above, we apply the CLG 2012 household representative rates to the EEFM’s latest (EEFM 2014) population forecast for Forest Heath.

99. The EEFM’s only available age groups are: total population (people of all ages); working age population (people aged 16 to 64); young population (people aged 0 to 15); and elderly population (people aged 65 and over). Therefore, we first apply the population structure from the ONS 2012 population projection for Forest Heath to the EEFM’s population forecast, as follows: the structure of the younger population is applied to the EEFM’s younger population forecast (i.e. the proportion of the younger population in each of the younger age groups in the ONS 2012 projection is calculated and multiplied by the EEFM’s younger population figure); the structure of the working age population is applied to the EEFM’s working age population forecast; and the structure of the older population is applied to the EEFM’s older population forecast. The total, working age, young, and elderly population figures are therefore all constrained to the EEFM’s population figures. We then use POPGROUP’s Derived Forecast model to apply the projected household representative rates to the EEFM’s population forecast by five-year age groups. As Table 5 below shows, the EEFM 2014 projected population change from 2011 to 2031 is 7,000 lower than the ONS 2012 projected population change.

100. Table 5 below shows the official household projection-based estimate of housing need for the period 2011 to 2031, and the adjusted estimate based on the EEFM 2014 forecast. The adjusted housing figure results from applying the CLG 2012 household representative rates to the EEFM 2014 population forecast, and converting the households to dwellings using the Census 2011 ratio of households to dwellings. As Table 5 shows, the adjusted estimate of housing need is 2,250 dwellings lower than the official household projection-based estimate for 2011-2031.

**Table 5: Official and adjusted household projection-based estimates of housing need**

Source of estimated/projected population	Population 2011	Population 2031	Population 2011-2031	Households 2011-2031	Dwellings 2011-2031	Jobs 2011-2031
ONS 2012	60,040	76,220	16,180	5,940	6,450	-
EEFM 2014	60,040	69,220	9,180	3,870	4,200	3,100



**Conclusion: What adjustment, if any, does the household projection-based estimate of housing need require?**

101. Having regard to the growth of the working age population in the housing market area, the latest employment trends provide no evidence for an upward adjustment to the housing need number suggested by household projections. Taking account of the latest (EEFM 2014) employment forecasts, the demographic projection therefore requires no adjustment.

**4.3 Taking market signals into account**

**Introduction**

102. The housing need number suggested by household projections (the starting point) may require adjustment to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.

103. In the following sections, alongside the report “Forest Heath District Market Signals and Objectively Assessed Housing Need February 2016” by Peter Brett Associates, we take account both of indicators relating to price (such as house prices, rents, affordability ratios) and quantity (such as overcrowding and rates of development).

104. We make appropriate comparisons of indicators. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally.

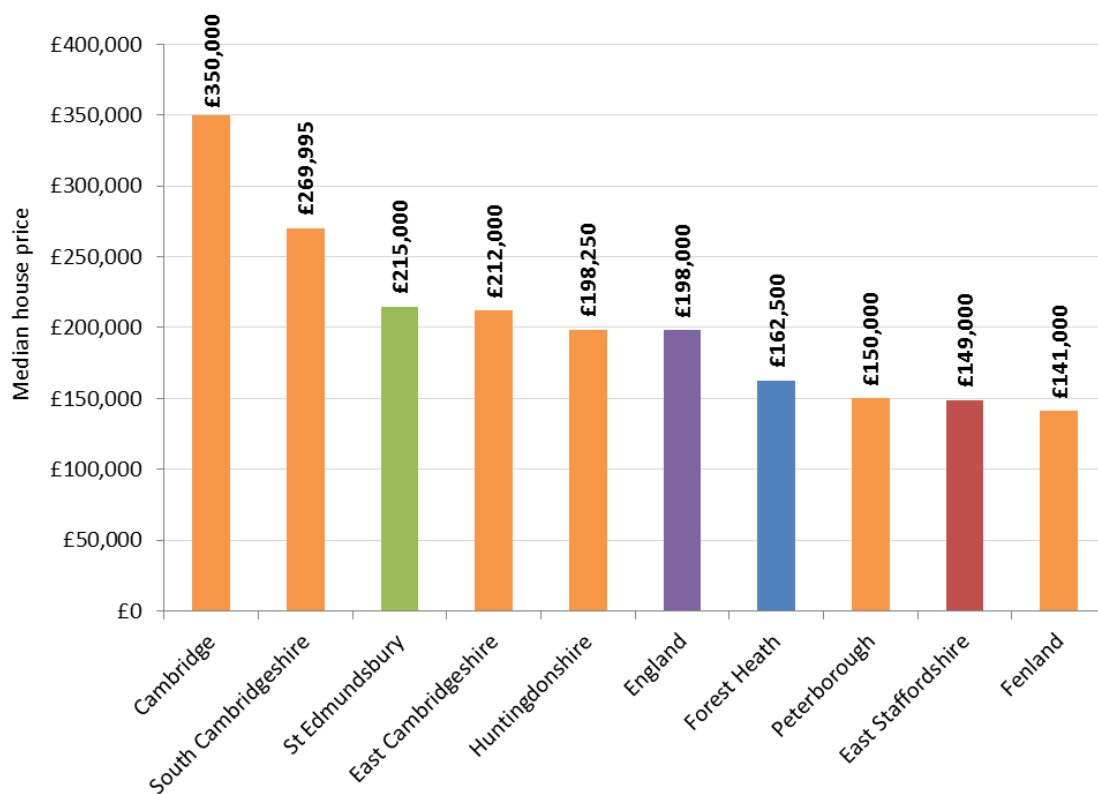
105. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.

106. If an upward adjustment is required, reflecting the findings of Peter Brett Associates, we will set this adjustment at a level that is reasonable, taking account of the outcomes of other local plan examinations.

## Indicators relating to price

107. Figure 9 below shows the average (median) house price in Forest Heath, in the other districts across the housing market area including St Edmundsbury, in East Staffordshire, in Peterborough, and across England.

**Figure 9: Average house prices in 2014 (ONS)**

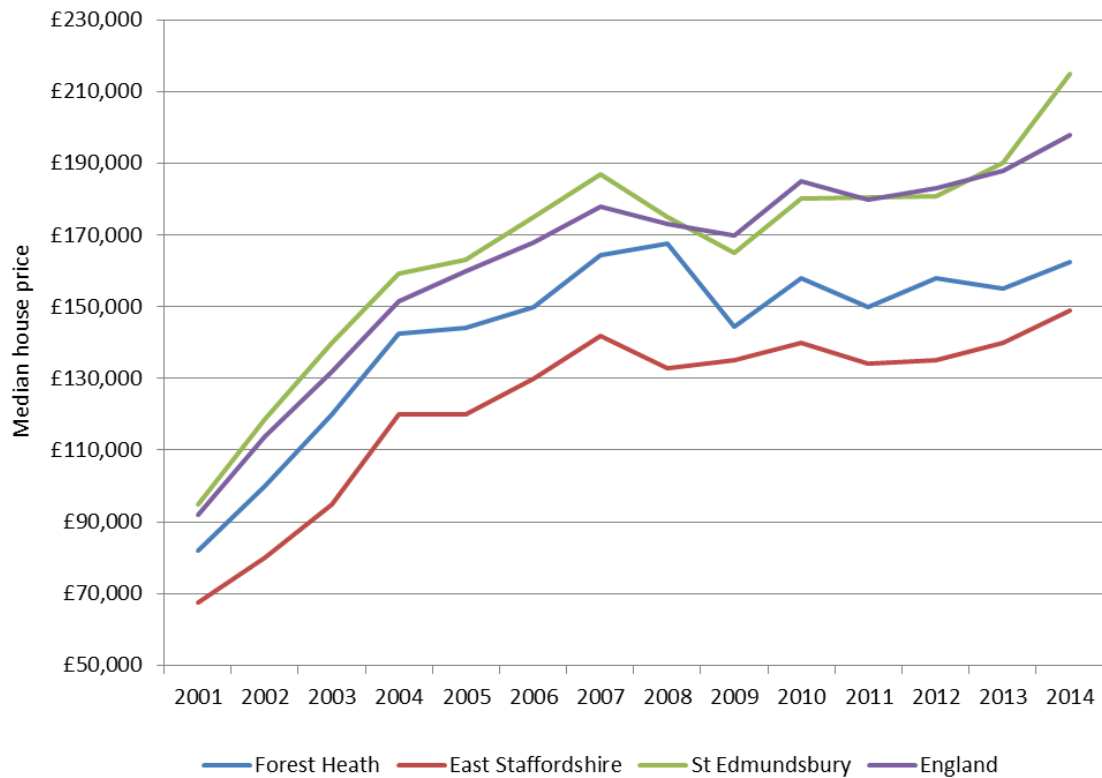


108. As Figure 9 shows, Forest Heath has the second lowest average house price of the seven districts in the housing market area, above only Fenland.

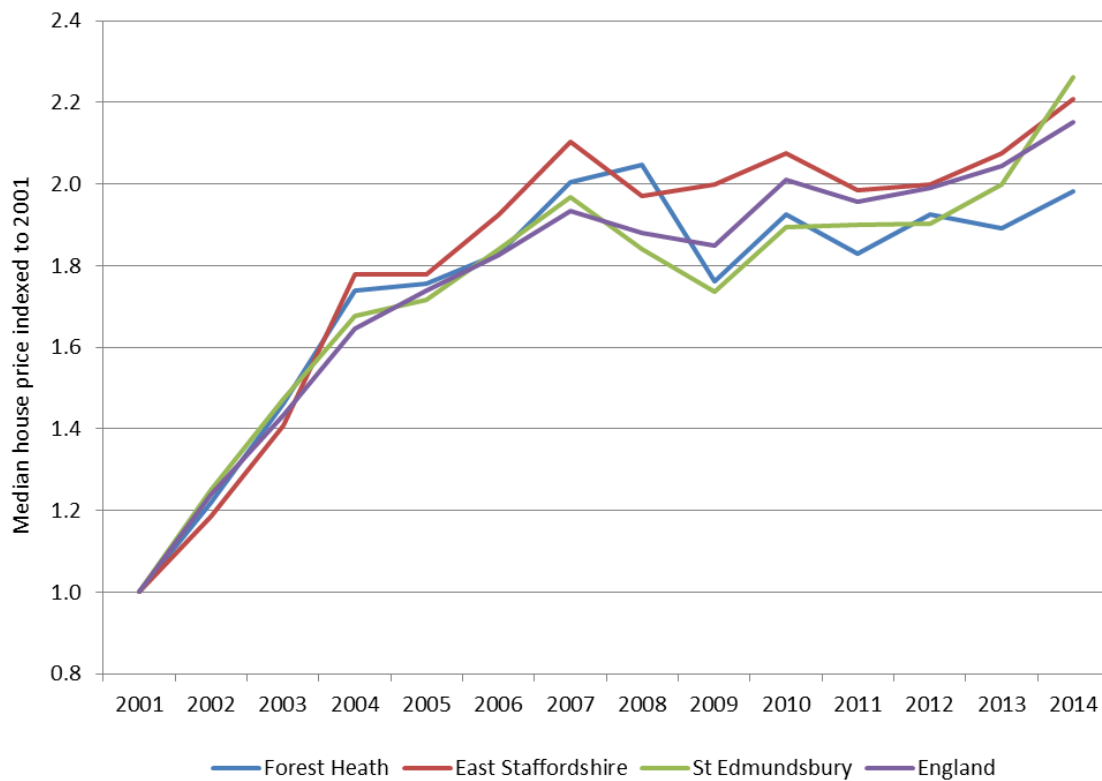
109. East Staffordshire and St Edmundsbury have average house prices lower and higher than Forest Heath respectively. We use CIPFA's 'nearest neighbours' model ([www.cipfastats.net/resources/nearestneighbours/](http://www.cipfastats.net/resources/nearestneighbours/)) with all its demographic and economic indicators to identify East Staffordshire and St Edmundsbury as two of the 'most similar' areas to Forest Heath. Forest Heath's average house price is higher than one of these 'most similar' areas, but is below the national average.

110. Longer term changes in house prices may indicate an imbalance between the demand for and the supply of housing. Figures 10 and 11 show the longer term trends in absolute levels (Figure 10) and rates of change (Figure 11). Figures 10 and 11 show a slight increase in Forest Heath's average house price in 2014, while Figure 12 shows the district's recent growth in house sales.

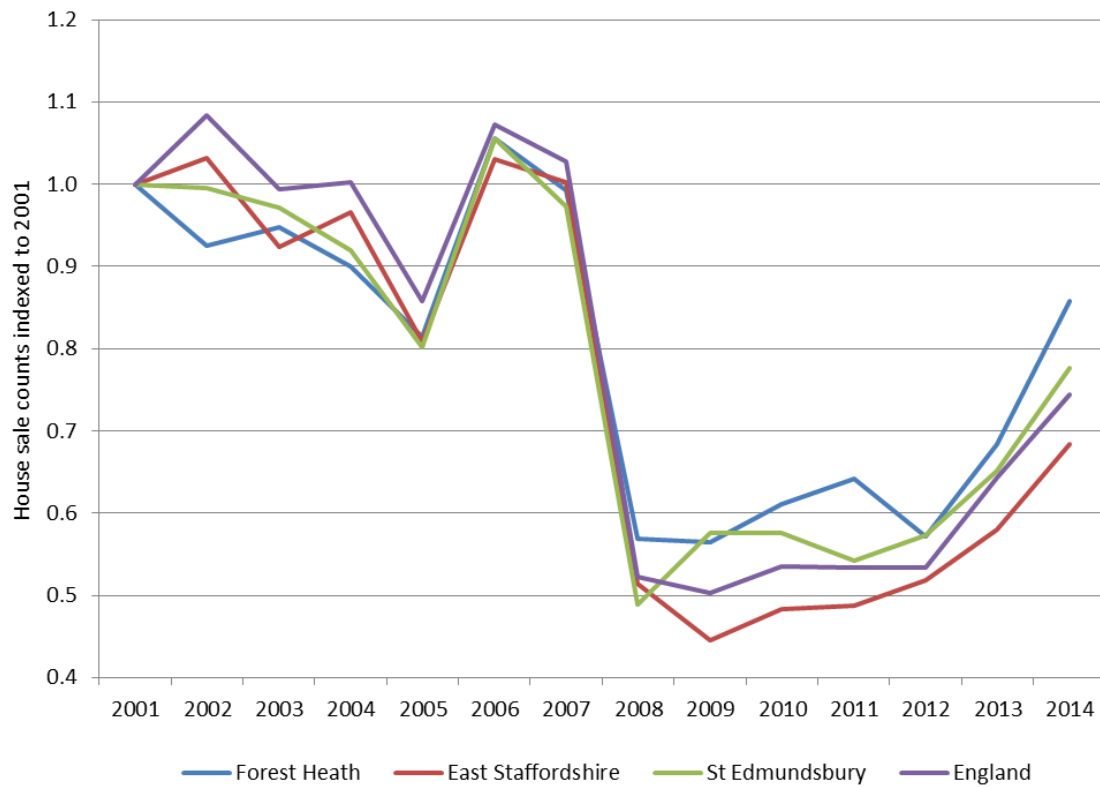
**Figure 10: Average house prices by year (ONS)**



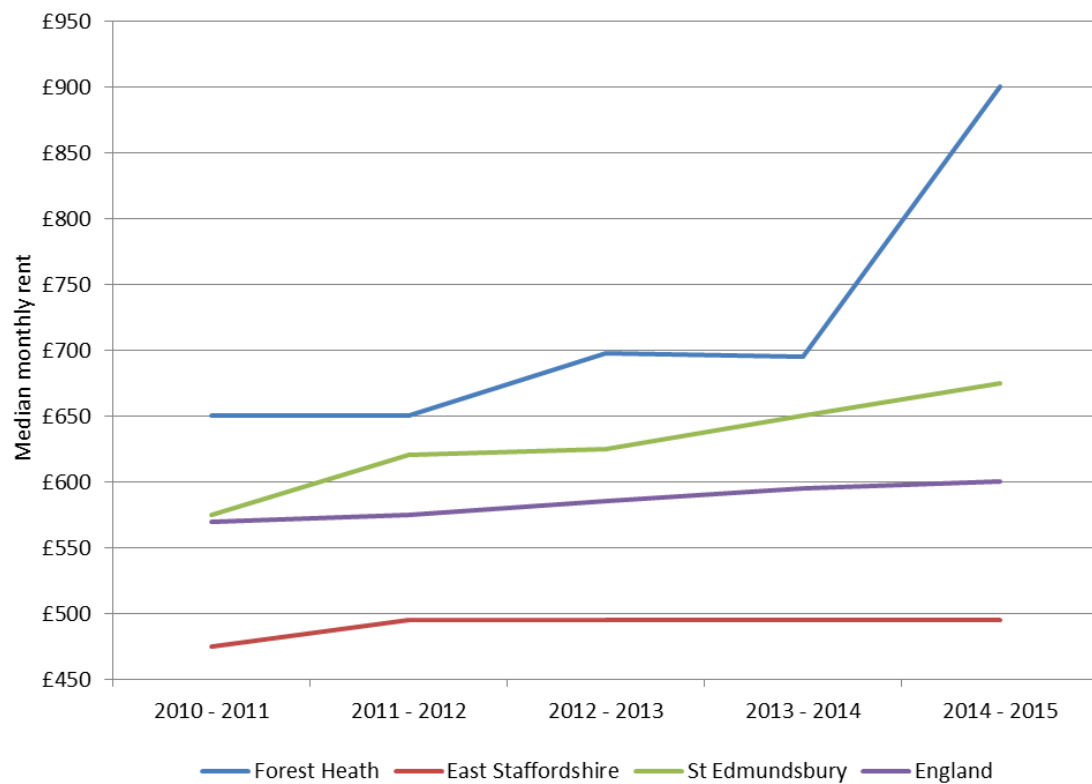
**Figure 11: Average house price indexed to 2001 (ONS)**



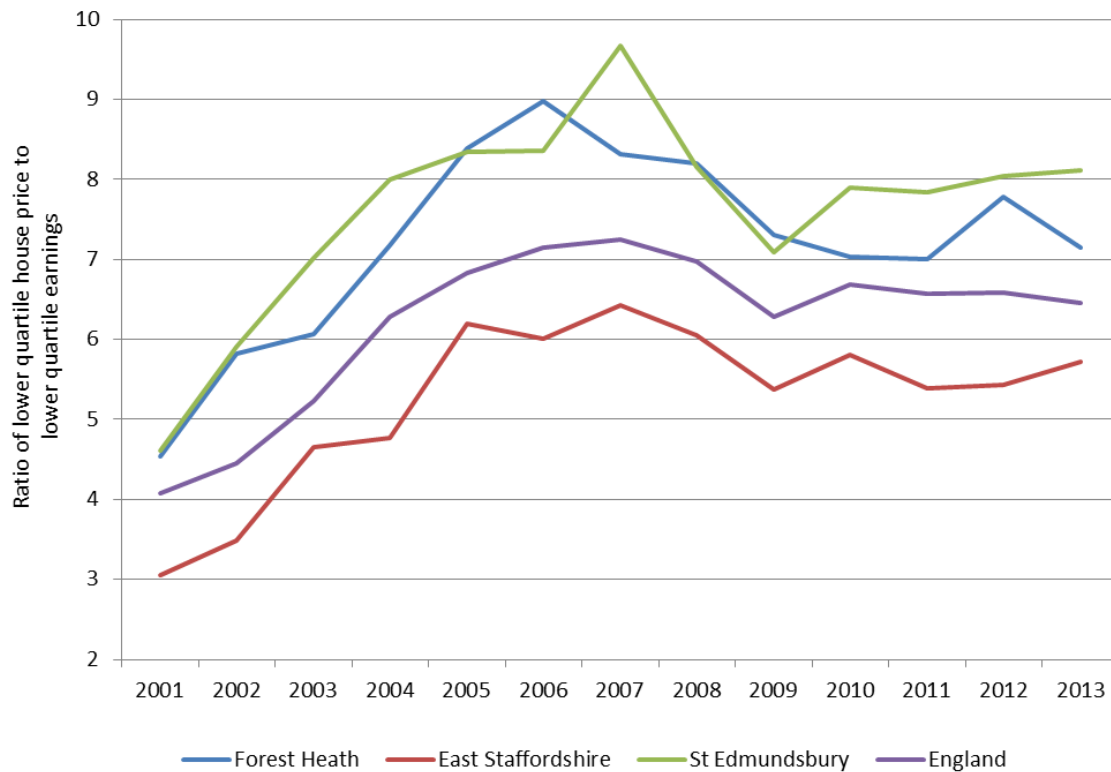
**Figure 12: House sale counts indexed to 2001 (ONS)**



**Figure 13: Average monthly rents by year (VOA)**



**Figure 14: Affordability ratios by year (CLG)**



111. Longer term changes in rents may also indicate an imbalance between demand for and supply of housing. Figure 13 shows an increase in Forest Heath’s average monthly rent in 2014/15, and rents in Forest Heath are considerably above the comparator areas.

112. Figure 14 shows the ratio of lower quartile house price to lower quartile earnings, which indicates the relative affordability of housing, and suggests:

*“affordability in Forest Heath is slightly worse than for England (though not the East of England and Suffolk) and has been so since the early 2000s. The reason is not that houses in the district are relatively expensive (they are not) but that residents’ earnings are relatively low.”*

Source: Forest Heath District Market Signals and Objectively Assessed Housing Need February 2016 (Peter Brett Associates)

113. Overall, while average house prices are lower in Forest Heath than in the comparator areas, there is one indicator that points in the opposite direction:

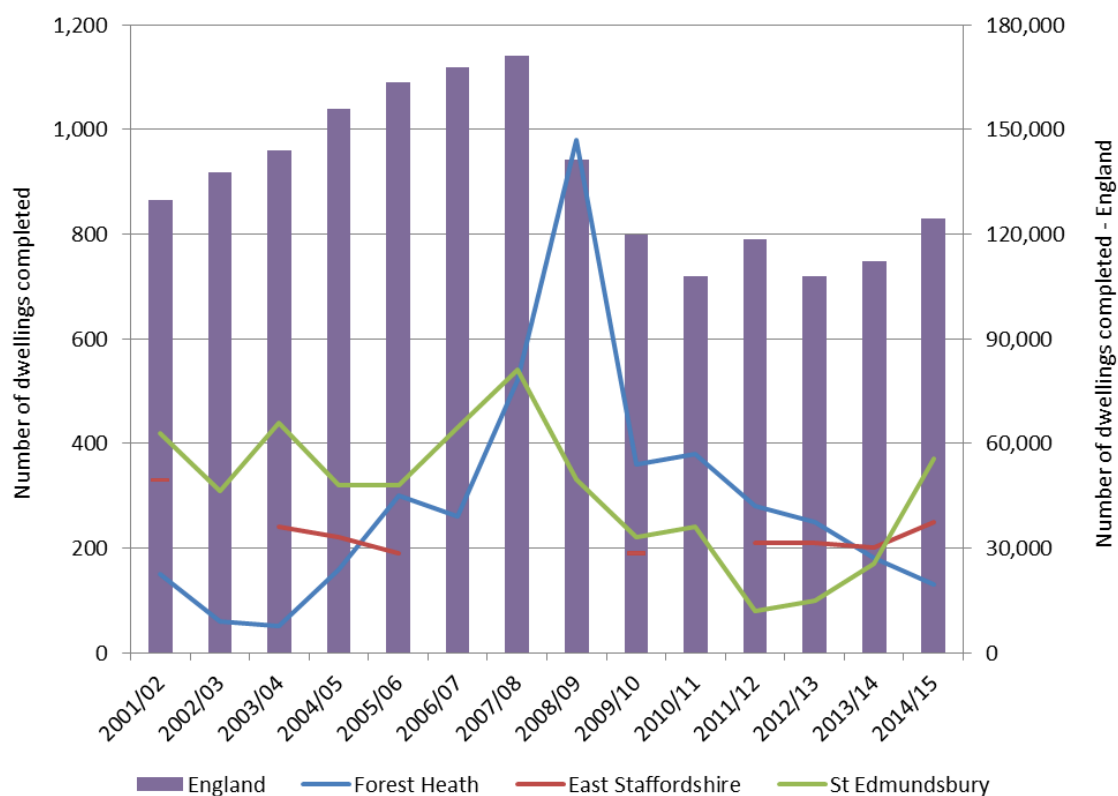
*“the exceptionally high level of market rents, which is due to demand from USAFE (United States Air Force in Europe) personnel and their families.”*

Source: Forest Heath District Market Signals and Objectively Assessed Housing Need February 2016 (Peter Brett Associates)

## Indicators relating to quantity

114. Figure 15 below shows the rate of development in Forest Heath, in East Staffordshire and St Edmundsbury, and across England, for the period since 2001/02. In broad terms, the historic rate of development in Forest Heath follows the national trend over the years until 2013/14. The number of dwellings completed in Forest Heath increases before the economic downturn, then falls sharply, before a weak recovery. However, while nationally, and in the comparator areas, dwelling completions have begun to increase since 2012/13, in Forest Heath, the rate of development has fallen in the year 2013/14 - as is also evident in Figure 4 in Section 4.1 - and has continued to fall in 2014/15.

**Figure 15: Dwellings completed by year (CLG)**

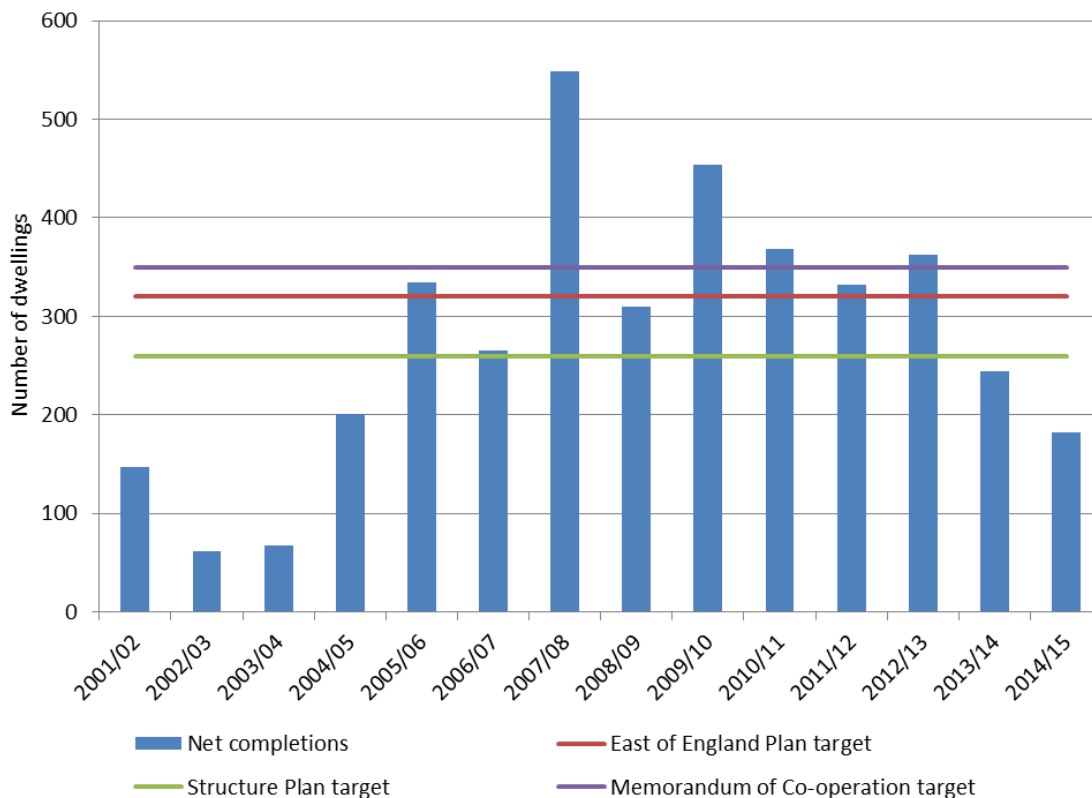


115. Figure 16 overleaf compares the rate of development in Forest Heath to various plan targets, and the Memorandum of Co-operation target, which reflects the SHMA (2013 version) OAN figure of 350 dwellings per annum.

116. *“In the base period whose trends the projections roll forward, 2007-12, the evidence mostly suggests that housing land supply has met demand.”*

Source: Forest Heath District Market Signals and Objectively Assessed Housing Need February 2016 (Peter Brett Associates)

**Figure 16: Dwelling completions compared to targets (FHDC)**



117. Figures 17 to 20 show various indicators relating to overcrowding. Indicators on overcrowding, concealed and sharing households, homelessness and the numbers in temporary accommodation demonstrate un-met need for housing. Longer term increases in the numbers of such households may be a signal to consider increasing planned housing numbers.

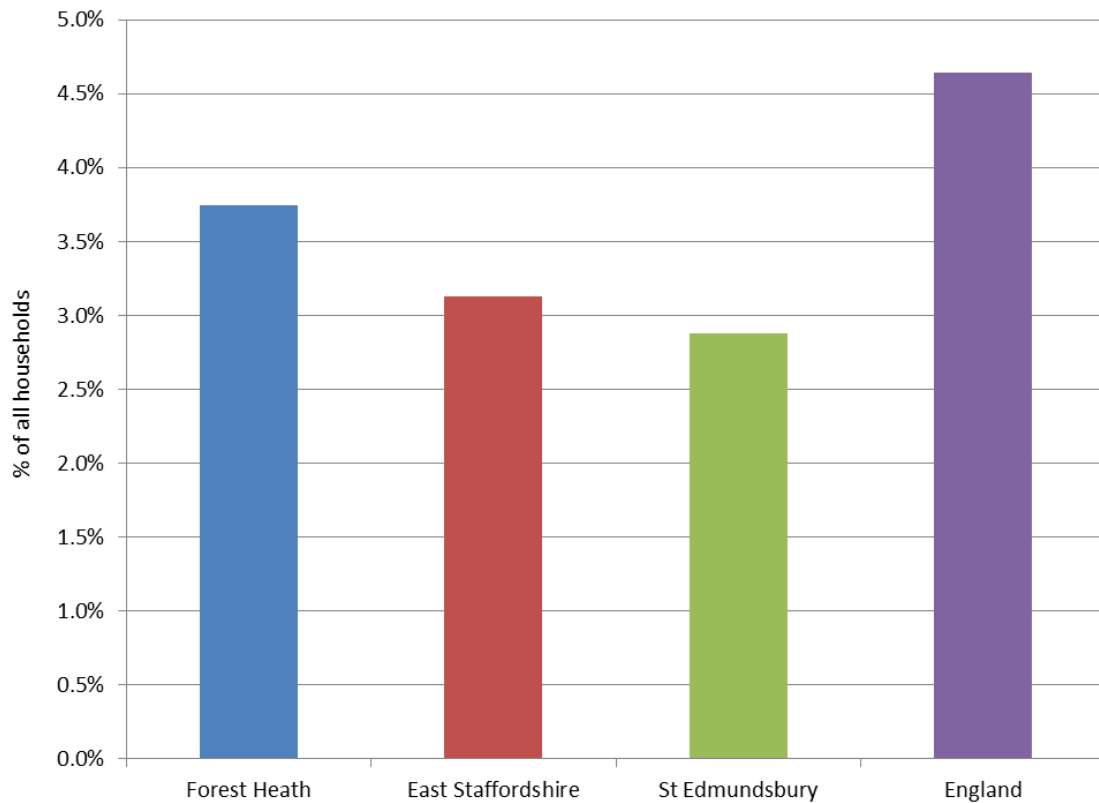
118. Figure 17 shows the proportion of households in Forest Heath with a negative occupancy rating in 2011. A negative occupancy rating implies that a household has fewer bedrooms than it requires. Although higher than in East Staffordshire and St Edmundsbury, the proportion of overcrowded households in Forest Heath is well below the England average.

119. Figure 18 shows the proportion of families in Forest Heath classed as concealed in 2011. The proportion of concealed families in Forest Heath is lower than in the comparator areas, and is well below the England average.

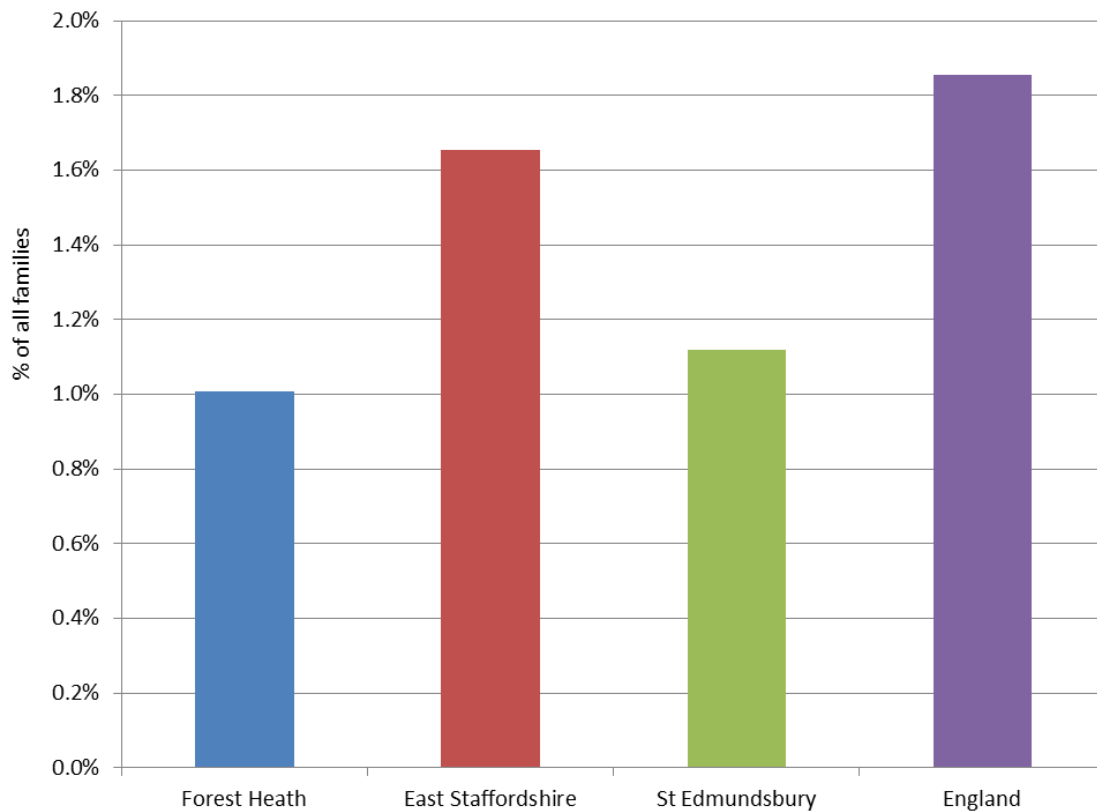
120. Figures 19 and 20 show the numbers of homeless households in priority need (Figure 19) and in temporary accommodation (Figure 20). Both indicators show levels below the England average in 2014/15, and decreasing longer term trends.

121. Overall, while longer term increases are not evident in the indicators relating to overcrowding, a worsening trend is evident - over the 2013 to 2015 period - in the rates of development indicator.

**Figure 17: Overcrowded households in 2011 (Census 2011)**



**Figure 18: Concealed families in 2011 (Census 2011)**

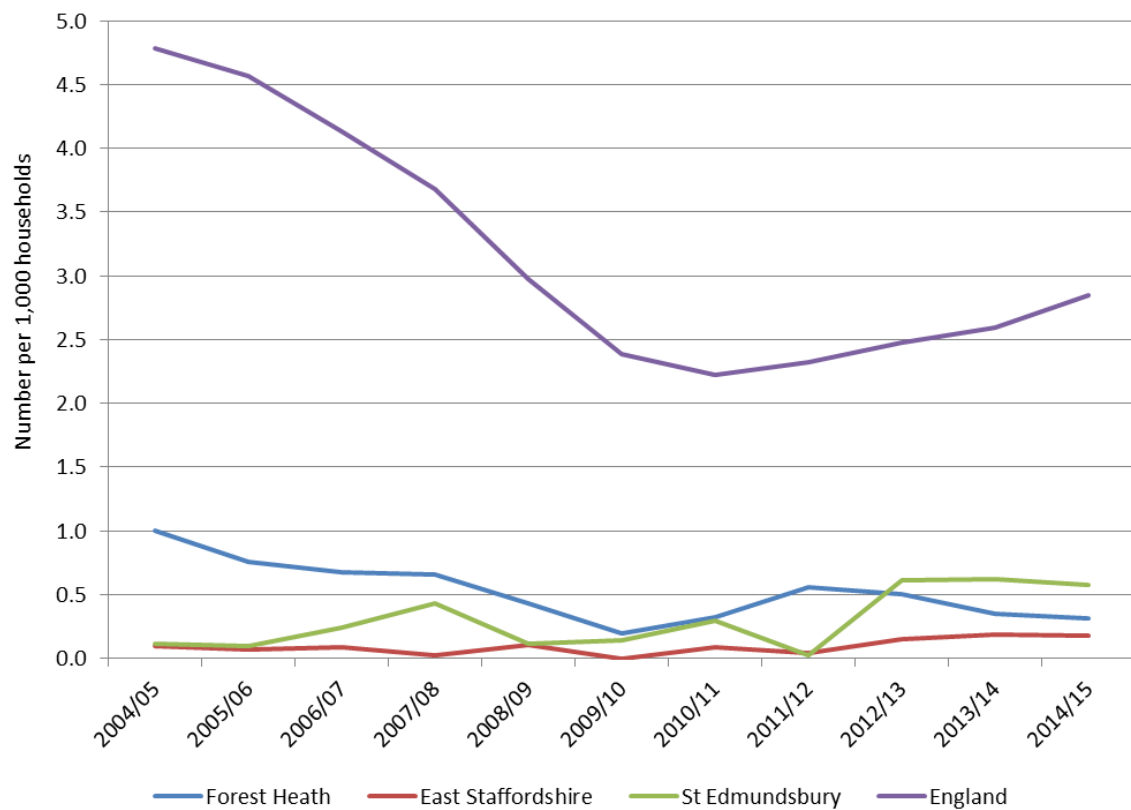




**Figure 19: Homeless households in priority need (CLG)**



**Figure 20: Households in temporary accommodation (CLG)**



## Market signals uplift

122. In the preceding sections, we find worsening trends in some of the indicators relating to price and quantity. Taking account of the latest market signals, we therefore find some limited evidence for an upward adjustment to the housing need number suggested by household projections. In this section, reflecting the findings of Peter Brett Associates, we set this adjustment at a level that is reasonable, taking account of the outcomes of other local plan examinations.

123. *“Some Local Plan Inspectors have used a rule of thumb, suggesting that in places where the evidence suggests moderate under-provision, or the signals are mixed the projected housing need might be increased by 10%. A possible alternative approach is to try and estimate what household growth would have been if land supply had not been especially constrained.”*

Source: Planning Advisory Service Objectively Assessed Need and Housing Targets Technical Advice Note Second Edition July 2015 (Peter Brett Associates) ([www.pas.gov.uk/web/pas1/local-planning/-/journal\\_content/56/332612/6363116/ARTICLE](http://www.pas.gov.uk/web/pas1/local-planning/-/journal_content/56/332612/6363116/ARTICLE))

124. Taking account of the outcomes of three other local plan examinations, the report by Peter Brett Associates concludes:

*“the size of any market signals uplift cannot be simply inferred from earlier examples; it also requires judgment. In our judgment the supply-demand imbalance reflected in the demographic projections for Forest Heath is less than for Eastleigh and Uttlesford and far less than for Canterbury. Therefore we suggest a market signals uplift of 5%.”*

Source: Forest Heath District Market Signals and Objectively Assessed Housing Need February 2016 (Peter Brett Associates)

125. Table 6 below shows the official household projection-based estimate of housing need for the period 2011 to 2031, and an adjusted estimate based on a 5% uplift. The adjusted housing figure results from applying an upward adjustment to planned housing numbers over the 2011 to 2031 period (compared to the ONS 2012 ones), to bring the population and households in 2031 to 5% above the levels suggested by the official 2012-based projections (i.e. 5% above the starting point (CLG 2012) estimate of 6,450 dwellings). As Table 6 shows, the adjusted estimate of housing need is 320 dwellings higher than the official household projection-based estimate for 2011-2031. As Table 6 also shows, the adjusted estimate is 2,570 dwellings higher than the EEFM 2014 estimate. Therefore, the level of the 5% uplift adjustment takes account both of the latest market signals, and the latest employment trends.

**Table 6: Official and adjusted household projection-based estimates of housing need**

Source of estimated/projected population	Population 2011	Population 2031	Population 2011-2031	Households 2011-2031	Dwellings 2011-2031	Jobs 2011-2031
ONS 2012	60,040	76,220	16,180	5,940	6,450	-
EEFM 2014	60,040	69,220	9,180	3,870	4,200	3,100
ONS 2012 + 5% uplift	60,040	77,030	16,990	6,240	6,770	5,200

**Conclusion: What adjustment, if any, does the household projection-based estimate of housing need require? What is the objectively assessed need?**

126. Taking account of the latest market signals (but not employment trends), the demographic projection is adjusted to 6,770 dwellings.

127. We take account of employment trends in Section 4.2. Taking account of the latest (EEFM 2014) employment forecasts, the demographic projection is not adjusted from 6,450 dwellings.

128. The highest of these housing figures, which is the objectively assessed need, is 6,770 dwellings.

129. This housing figure is 5% higher than the starting point (CLG 2012) estimate of 6,450 dwellings (5,940 households).

#### 4.4 Addressing the needs for all types of housing

130. Once an overall housing figure has been identified, the Strategic Housing Market Assessment will break this down by tenure, household type (singles, couples and families) and household size.

131. The purpose of this report is only to identify the future quantity of housing needed.

#### 4.5 Calculating affordable housing need

##### Introduction

132. In the following section, we estimate the number of households and projected households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market.

133. This calculation involves adding together the current unmet housing need ('A') and the projected future housing need ('B') and then subtracting from this the current supply of affordable housing stock ('C').

134. Building on the existing evidence base of partner local authorities in the Cambridge housing market area, we present an updated calculation which follows the same methodology as the existing Strategic Housing Market Assessment (2013 version).

135. *"As well as the OAN, which covers all tenures of housing, the Cambridgeshire SHMA calculated the need for affordable housing, through a method based on the 2007 Planning Practice Guidance (that guidance has since been revoked, but is replaced by a similar method set out in paragraphs 022-029 of the PPG)."*

Source: Cambridge and South Cambridgeshire Local Plan Examination Objectively Assessed Housing Need Further Evidence November 2015 (Peter Brett Associates)

136. We then consider the total affordable housing need in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments, based on past delivery rates.

### Affordable housing need

137. Table 7 below presents a 2014 update of the Strategic Housing Market Assessment (2013 version) affordable housing need calculation. Chapter 13 of the SHMA provides a description of this calculation ([www.cambridgeshireinsight.org.uk/housing/shma/shma-current-version](http://www.cambridgeshireinsight.org.uk/housing/shma/shma-current-version)).

**Table 7: Affordable housing need in Forest Heath**

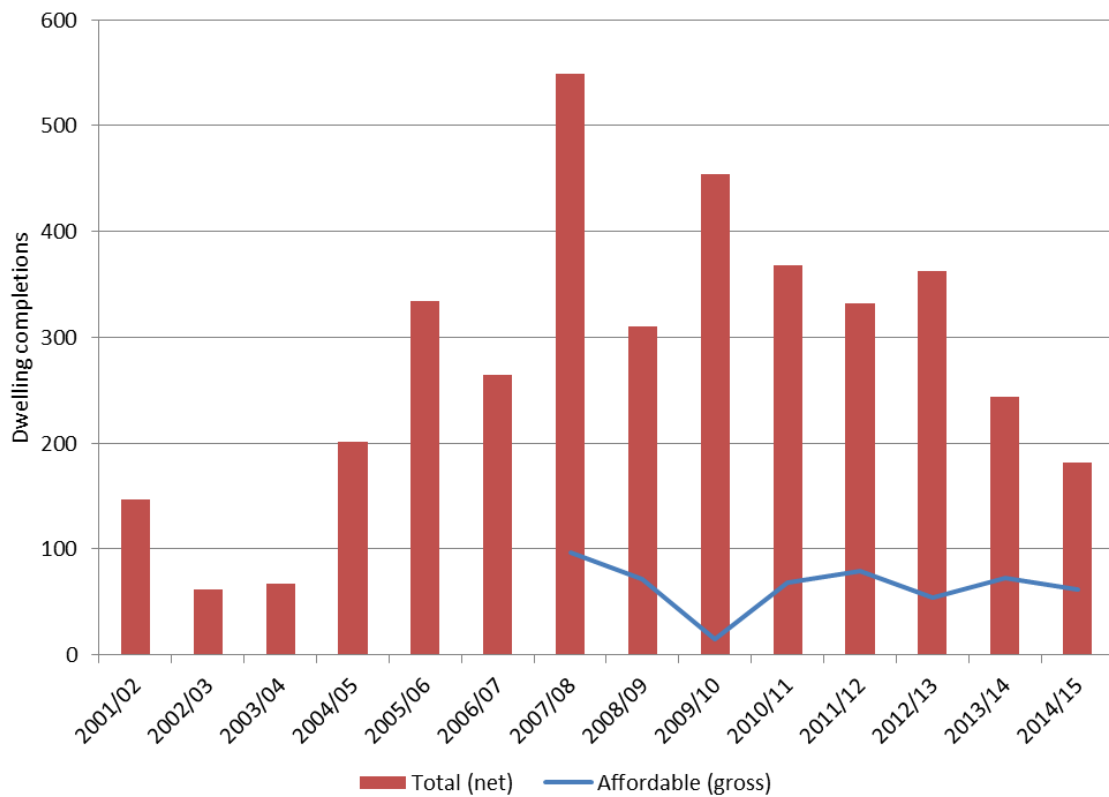
CLG 2007 Guidance reference		2014
5.1.1	Homeless households	10
5.1.2	Overcrowded	344
	Concealed	177
5.1.3	HNR Band A	83
	HNR Band B	343
	HNR Band C	339
	HNR Band D	389
	Revised Band D (not including intermediate overlap)	389
	Intermediate Register	19
	Register overlap	0
<b>5.1</b>	<b>Current total housing need (A)</b>	<b>1,694</b>
5.2.1	From existing households - number	277
	In migrant owner occupiers - number	60
	In migrant private tenants - number	38
	In migrant social tenants - number	6
	In migrant other (LCHO) - number	0
5.2.2	From existing households - multiplier	37%
	In migrant owner occupiers - multiplier	0%
	In migrant private tenants - multiplier	0%
	In migrant social tenants - multiplier	100%
	In migrant other (LCHO) - multiplier	100%
	Newly forming households unable to afford	109
5.2.3	Households who enter the register and are housed within the year	114
<b>5.2</b>	<b>Total newly arising need (yearly)</b>	<b>223</b>
5.3.1	Affordable dwellings occupied by households in need	0
5.3.2	Surplus stock (If less than 3% = 0%)	0
5.3.3	Committed supply of new affordable units	112
5.3.4	Units to be taken out of management	0
<b>5.3.5</b>	<b>Total stock available</b>	<b>112</b>
5.3.6	Annual supply of social re-lets	154
5.3.7	Annual supply of intermediate affordable housing available for re-let or re-sale at sub-market levels	22
<b>5.3.8</b>	<b>Total annual supply of affordable housing</b>	<b>176</b>

	Total supply	288
	Total supply not including committed supply (yearly)	176
	Plan period newly arising need (20 years) (B)	4,457
	Plan period newly arising need AND current need (A + B)	6,151
	Plan period supply not including new build (20 years) (C)	3,513
	Plan period newly arising need AND current need MINUS plan period supply not including new build (A + B - C)	2,638

138. As Table 7 above shows, the current unmet (gross) need for affordable housing ('A') is 1,694 households. The number of newly arising households likely to be in affordable housing need (gross annual estimate) is 222.84 households. The 20-year newly arising (gross) need for affordable housing ('B') is therefore 4,457 households. The total gross need for affordable housing ('A' + 'B') is therefore 6,151 households.

139. As Table 7 also shows, the current total affordable housing supply available is 112 homes. The likely level of future housing supply of social re-lets (net) and intermediate affordable housing (excluding transfers) is 176 homes per year. In 2014, the total available supply of affordable housing stock including committed supply is therefore 288 homes. (The Strategic Housing Market Assessment will consider the relationship between the house size in the current housing stock and current and future needs.)

**Figure 21: Total and affordable dwelling completions in Forest Heath (FHDC)**



140. Excluding new build, the annual affordable housing supply is an estimated 175.67 homes. The 20-year supply of affordable housing stock excluding new build is therefore 3,513 homes, which is the total available stock of affordable housing ('C').

141. Subtracting total available stock from total gross need ('A' + 'B' - 'C'), the total net need for affordable housing is therefore 2,638 homes over 20 years, which converts into an annual flow of 132 houses per year.

142. The total need for affordable housing over the plan period is therefore 2,638 new homes.

143. Figure 21 above shows the number of affordable dwelling completions in Forest Heath for the period since 2007/08. The percentage of affordable dwelling completions ranges from 34% of all completions (net) in 2014/15, to 3% in 2009/10, and averages at 19% over the period 2007 to 2015.

144. The overall housing figure that has been identified is 6,770. The total need for affordable housing that has been calculated is 2,638. The required number of affordable homes is therefore 39% of the overall housing figure.

145. This proportion is above the average percentage of affordable dwelling completions over the period of available data. If it could help deliver the required number of affordable homes, FHDC should consider an increase in the total housing figures included in the local plan.

## **Conclusion**

146. The total need for affordable housing is 2,638 houses for 2011-2031, which represents 39% of the overall housing figure.

## **5 Conclusion**

147. The purpose of this report is to identify the future quantity of housing needed.

148. To ensure that the assessment findings are transparently prepared, this report follows closely the standard methodology set out in the national planning practice guidance.

149. Building on the existing evidence base of partner local authorities in the Cambridge housing market area, this report follows closely the technical advice in the Objectively Assessed Need and Housing Targets note prepared for the Planning Advisory Service (PAS) by Peter Brett Associates.

150. Analysis of the latest migration and commuting data provides up-to-date supporting evidence for the established definition of the Cambridge housing market area.

151. The starting point estimate of overall housing need is 6,450 dwellings. Taking sensitivity testing into account the unadjusted estimate of overall housing need is 6,450 dwellings. Taking employment trends into account the estimate of overall housing need is 4,200 dwellings. Taking market signals into account the estimate of overall housing need is 6,770 dwellings.

152. Table 8 below provides a summary of our assessment.

**Table 8: Establishing future need for housing**

Source of estimated/projected population	Population 2011	Population 2031	Population 2011-2031	Households 2011-2031	Dwellings 2011-2031	Jobs 2011-2031
ONS 2012	60,040	76,220	16,180	5,940	6,450	-
EEFM 2014	60,040	69,220	9,180	3,870	4,200	3,100
ONS 2012 + 5% uplift	60,040	77,030	16,990	6,240	6,770	5,200

153. Taking account of sensitivity testing and the latest demographic estimates, the starting point (CLG 2012) estimate of 5,940 households (6,450 dwellings) is not adjusted from 6,450 dwellings for the period 2011 to 2031. Taking account of the latest employment trends, the demographic projection is not adjusted from 6,450 dwellings. Taking account of the latest market signals, the demographic projection is adjusted to 6,770 dwellings. The highest of these housing figures, which is the objectively assessed need, is 6,770 dwellings.

154. This housing figure results from applying the household representative rates from the latest (CLG 2012) household projections to the population forecast from the latest (ONS 2012) population projections, converting the households to dwellings using the Census 2011 ratio of households to dwellings, and adjusting upwards the number of dwellings by 5%. This housing figure aligns with an increase in net out-commuting, meeting the housing needs of the housing market area, and results in an above-trend increase in the workplace population (jobs growth) in Forest Heath, as follows: The housing figure of 6,770 dwellings aligns with a projected population increase for the 2011 to 2031 period of 16,990 people. For a population growth figure of 16,990, which is 5% higher than 16,180 (ONS 2012), the EEFM forecasts a jobs growth figure of 5,200 jobs, which is 2,100 jobs higher than the EEFM 2014 estimate.

155. We consider the future quantity of housing needed is therefore 6,770 dwellings, which is 6,800 dwellings to the nearest 100 dwellings. This report therefore recommends the overall housing figure is 6,800 dwellings.

156. Based on an updated calculation, the total 20-year need for affordable housing is 2,638 houses.

157. If it could help deliver the required number of affordable homes, FHDC should consider an increase in the total housing figures included in the local plan.

158. The SHMA will provide a breakdown of the overall housing figure by type, tenure and size, and will monitor housing conditions for any meaningful change in the housing situation, including changes relating to the planned closure of the RAF airbase at Mildenhall.

**Cambridgeshire County Council Research Group  
January 2016**

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## **Forest Heath District Market Signals and Objectively Assessed Housing Need**

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February 2016

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Project Ref 36313

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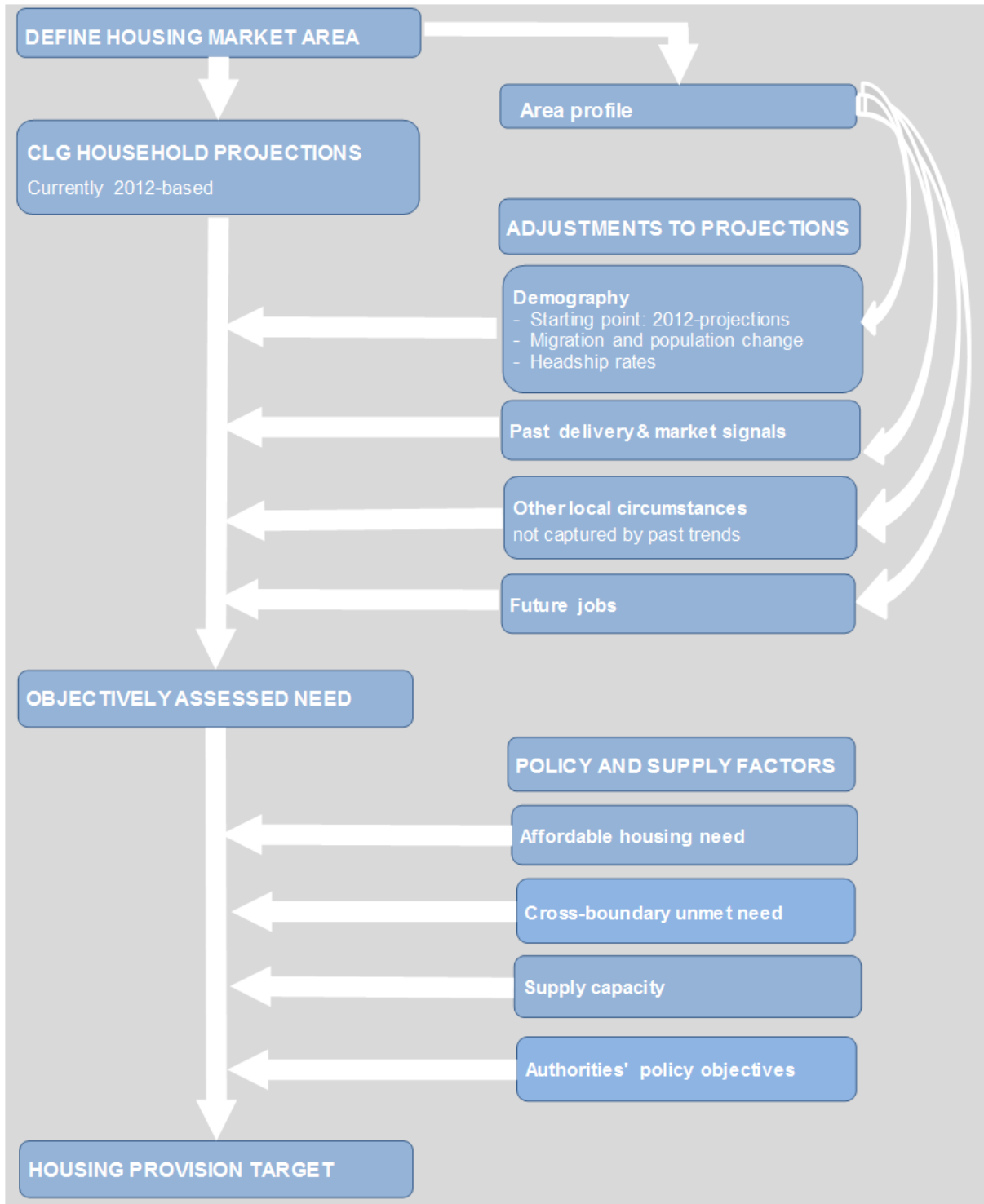


# 1 INTRODUCTION

- 1.1 This study was commissioned by Forest Heath District Council to help inform a single-issue review of the district's adopted Core Strategy (2010). The review relates to Policy CS7, which was quashed by a High Court Order in 2011. The policy sets out overall housing provision targets and the broad spatial distribution of housing development. The court order relates to that spatial distribution and does not invalidate the overall targets of 320 new dwellings per annum (dpa) in 2001-21 and 370 dpa in 2021-31. But the Council has resolved to include the overall targets in the review, because they are out of date, being based on the Regional Strategy, which has since been revoked.
- 1.2 In line with the National Planning Policy Framework and National Planning Practice Guidance, local planning authorities should make a full assessment of their housing needs, working with neighbours where housing market areas cross administrative boundaries, and they should meet those needs in full unless they lack the sustainable capacity to do so. The Guidance recommends a method for this assessment and target-setting, which is summarised at Figure 1.1.
- 1.3 The starting point of the assessment should be the demographic projections published by the Department of Communities and Local Government (CLG). These projections should then be tested, and if appropriate adjusted, to ensure that they are a correct reflection of past trends based on the latest available data. The resulting trend-based projection should then be tested, and may be adjusted, for future factors that are not captured by past trends. In particular:
  - If evidence of past provision and market signals suggests that supply historically fell short of need, the trend-based projection will understate the true need and should be adjusted upwards,
  - If supply in line with the projections would not provide enough workers to support the expected growth in jobs, the projection should be adjusted upwards; alternatively there should be other measures to restore the balance of the labour market, such as improvements to transport infrastructure.
  - If the emerging housing number would not provide enough developer contributions to meet the area's affordable housing need, consider an increase so that more affordable housing can be delivered.
- 1.4 In the case of Forest Heath, the Council worked with neighbouring authorities to define the Cambridge Sub-region housing market area (HMA), which comprises all of Cambridgeshire and the western section of Suffolk (Figure 1.2). Housing needs across the HMA were assessed by the 2013 Housing Market Assessment (SHMA).
- 1.5 The SHMA pre-dated the final publication of the PPG and used a different method, which combined demographic projections and labour market calculations rather than considering them sequentially. It concluded that the objectively assessed housing need (OAN) for Forest Heath over the plan period 2011-31 was 7,000 net new dwellings, equal to 350 dpa. The SHMA also estimated that this level of housing

development would be enough to keep the labour market in balance across the HMA, with commuting from other districts offsetting what would otherwise be a labour deficit in the city and South Cambridgeshire. The authorities in the area endorsed the SHMA's analysis and agreed to act on it through the Cambridgeshire & Peterborough Memorandum of Co-operation (2013).

**Figure 1.1 Assessing needs and setting targets**



Source: Planning Advisory Service, *Objectively Assessed Need and Housing Targets, Technical advice note, 2nd edition, July 2015*

**Figure 1.2 The Cambridge Sub-region Housing Market Area**



Source: Cambridge Sub-region SHMA 2013

- 1.6 As part of the single-issue review the Council decided to revisit this assessment, using the latest available evidence and the method recommended by the PPG. The new evidence base was commissioned from two separate consultants. The Cambridgeshire Research Group (CRG), part of the County Council, analyses the demographic and labour market evidence. The present study deals with past provision, market signals and affordable need.
- 1.7 The CRG study<sup>1</sup> tests the latest CLG household projection, which is the 2012-based release published in February 2015 and shows growth of 5,940 households over the plan period 2011-31. It concludes that on the information available that projection is the correct demographic starting point. After adjustment for vacant and second dwellings, it produces a housing need of 6,450 dwellings over the plan period<sup>2</sup>.
- 1.8 The CRG also tests the labour market implications of this figure, using the East of England Forecasting Model (EEFM). It estimates that housebuilding in line with the

<sup>1</sup> Cambridgeshire Research Group, *Forest Heath Objectively Assessed Housing Need January 2016*

<sup>2</sup> Numbers are rounded.

projection would deliver enough workers to match the district's expected job growth, and also to provide additional net out-commuters to Cambridge City and South Cambridgeshire.

- 1.9 In this report we test the CLG 2012 figure of 6,450 dpa against past provision and market signals, to see if it should be adjusted upwards. Section 2 below explains our method Sections 3-5 analyse the evidence and Section 6 draws conclusions.



## 2 STUDY METHOD

- 2.1 To apply the 'market signals test' correctly, it is important to understand the thinking behind it. This is explained at paragraphs 015 of the PPG:

*'The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.'*<sup>18</sup>

- 2.2 In other words, demographic projections roll forward past reality – the amount of housing that has been provided in the reference period on which the projections are based. If this past supply met demand (need) in full, then other things being equal the projection should be an accurate reflection of future demand. But if past supply under delivered against demand, then the projection will carry forward that under delivery; therefore it will understate future demand and should be adjusted upwards.

- 2.3 The Guidance goes on to discuss how we can diagnose such under-delivery.

*'The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand ...'*<sup>19</sup>

- 2.4 It then lists a number of these market signals, comprising mainly price signals (land prices, house prices, rents, affordability) but also indicators relating to the occupation of dwellings (overcrowding, concealed families) and social hardship (households homeless or in temporary accommodation) and adds:

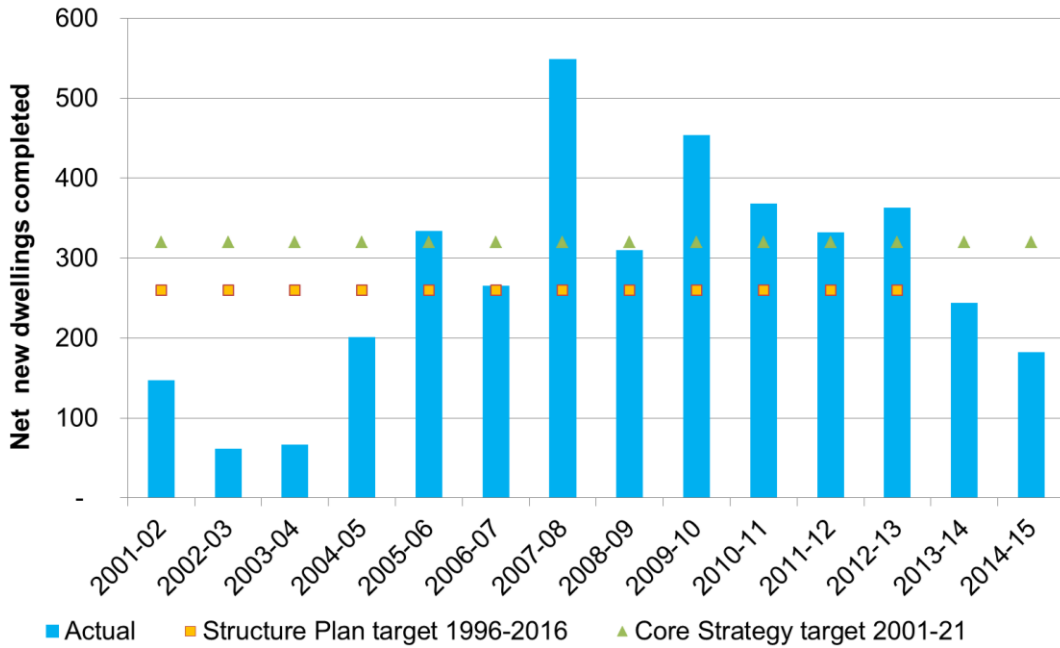
*Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.'*<sup>20</sup>

- 2.5 Below, we analyse these market signals in Section 4. But first, in Section 3 we look at the direct evidence of past housing delivery, to see if there is any indication that land was undersupplied against demand.

### 3 PAST HOUSING PROVISION

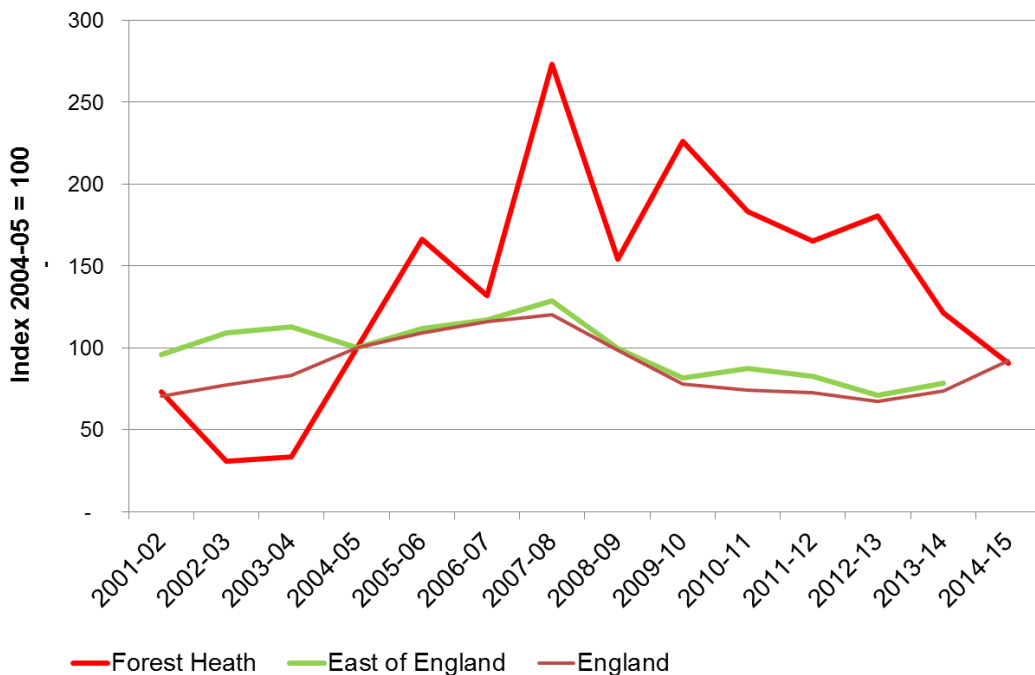
3.1 Below, Figure 3.1 shows net housing delivery in Forest Heath since the beginning of the century, and Figure 3.2 compares the district's trajectory with those for England and the East of England region.

**Figure 3.1 Net housing completions, Forest Heath**



Source: District Council

**Figure 3.2 Net housing completions, Forest Heath, region and England**



Source: District Council, CLG

- 3.2 Delivery in Forest Heath shows much greater changes from year to year than the regional and national totals. This is not surprising, because in the district total numbers are much smaller, and therefore random fluctuations ('noise in the system') are bound to be greater. Leaving aside these year-to-year fluctuations, in general the three series follow similar trends. In Forest Heath, as in England and the East of England, housing delivery rose to a peak in 2007-08 and fell in succeeding years as the recession took hold. Clearly these trends are nothing to do with supply-side constraints. Rather, the downturn from 2008 onwards reflects falling demand due to tighter credit and falling household incomes in the recession and its long aftermath.
- 3.3 However there are two marked differences between Forest Heath and the national and regional trends. The first was a marked dip in delivery, against the national trend, in the two years to 31 March 2004. We do not know the reason for this short-lived downturn. But it has no impact on the 'demographic starting point', because that figure is taken from the CLG 2012 projection, and the base period whose local trends that projection rolls forward only cover the five years from 1 July 2007 to 30 June 2012<sup>3</sup>. Similarly the scenarios used by CRG to sensitivity-test CLG 2012 exclude the local downturn of the early 2000s<sup>4</sup>.
- 3.4 The second departure from wider trends is more recent: in 2013-14 and 2014-15 completions in Forest Heath continued to fall, while England and the region started a modest recovery. The explanation may be insufficient land supply, due to a planning vacuum in recent years. The 2010 Core Strategy noted that by 2009 the housing sites allocated in the 1995 Local Plan had been exhausted<sup>5</sup>. (This analysis did not count the development capacity identified in the Red Lodge Masterplan as an outstanding allocation, because it already had planning permission.) Accordingly the document noted that to deliver the Strategy would require new land allocations, which would be identified in the emerging Site Allocations Development Plan Document. But this document, now called the Site Allocations Local Plan, is still a work in progress, as the second Issues and Options version was published for consultation in August 2015). Meanwhile housing delivery has been largely on windfall sites, as noted in the Council's 2015 Technical Paper:
- 'Windfall rates in recent years reflect a period of time when the majority of the site allocations from the 1995 local plan were built out, and there was no five year land supply, so a large proportion of sites coming forward were windfall.'*<sup>6</sup>
- 3.5 In recent years Forest Heath has not had an up-to-date local plan, and at times has not had a five-year land supply. In these circumstances, national planning policy says that the local planning policies for the supply of housing should not be considered up to date. In these circumstances, we are informed by officers that the Council has

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<sup>3</sup> Official demographic estimates and projections relate to the mid-year (30 June), while local authority monitoring data relate to 31 March.

<sup>4</sup> CRG's '5yr' scenario is based on the change from 2009 to 2014. Its '10yr' scenario is based on change from 2004 to 2014.

<sup>5</sup> See table on page 55

<sup>6</sup> Forest Heath District Council, Single Issue Review (SIR) of Core Strategy Policy CS&, *Technical paper to support the overall housing requirement and distribution of the district*, August 2015

approved a number of developer-led applications on unallocated sites. Consequently, despite having no allocations remaining the district since April 2015 has had a five-year land supply against the need of 350 dpa assessed in the Cambridgeshire sub-region SHMA.

- 3.6 In summary, since the beginning of the century housing delivery in Forest Heath has broadly followed the national and regional trend, so annual dwelling completions rose until 2007-08 and subsequently fell as the recession took hold. This time profile reflects changing demand, as incomes and access to credit improved in the long economic boom and then deteriorated in the recession. But in 2013-14 and 2014-15, while national and regional delivery rose gently in the economic recovery, in Forest Heath it continued to fall. This may in part be explained by the lack of sites in the earlier period 2013/14, as the Council did not consider it had a five-year land supply until 2014/15, and also due to slow implementation of sites with planning permission. Windfall proposals helped meet demand but may not have filled the whole gap, especially as Forest Heath is an environmentally sensitive area.
- 3.7 We conclude that in the last two years for which we have data, approximately from April 2013 to March 2015, Forest Heath may have underprovided land against demand. If those two years were a significant part of the base period whose trends the demographic 'starting point' projection rolls forward, an uplift to that projection might be justified. But this is not the case, because the base period of the CLG 2012 projection is much later, starting in 2007. Therefore in our view the history of past housing provision does not justify an uplift to the demographic starting point of 322 net new dwellings per annum.

## 4 MARKET SIGNALS

4.1 Below, we analyse the main market signals set out at paragraph 019 of the PPG. But we exclude two of these signals:

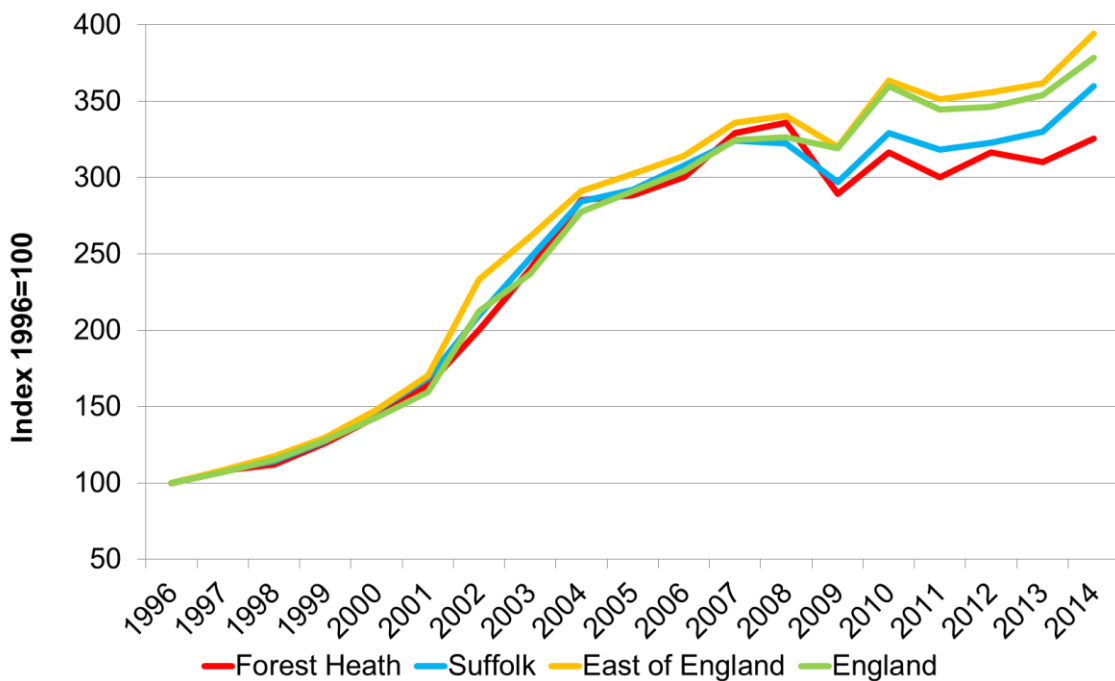
- Land prices, because the necessary data are not available (the statistical series published by the Valuation Office Agency was discontinued in 2010 and there is no alternative source);
- Rates of development compared to previous plan targets, because the discussion at paragraph 019 of the guidance suggests that this item bears on buffers and reserve sites rather than objectively assessed need. (In the last section we have already analysed rates of development, but from a different perspective, assessing them against demand or need rather than earlier targets.)

### House prices

4.2 Land Registry data for 2014 show median house prices of £162,500 in Forest Heath, against £217,250 in England, 230,274 in the East of England and £189,143 in Suffolk. Thus, in absolute terms the typical house price in Forest Heath is below all the comparator areas.

4.3 Similarly house price growth in the district has been slower than the comparator areas (Figure 4.1):

**Figure 4.1 Median house prices, 1996-2014**



Source: CLG, ONS

- 4.4 From the mid-1990 until the pre-recession peak, prices in England, the East of England region, Suffolk and Forest Heath moved almost exactly in parallel. But different areas responded differently to the recession:
- Between 2008 and 2009 the median house price fell more steeply in Suffolk and Forest Heath than in England and the region.
  - From 2009 to 2014 prices in all areas resumed their upward trend. For Suffolk the trend roughly paralleled England and the region. But for Forest Heath the recovery was slower, so it got even further behind the other areas.

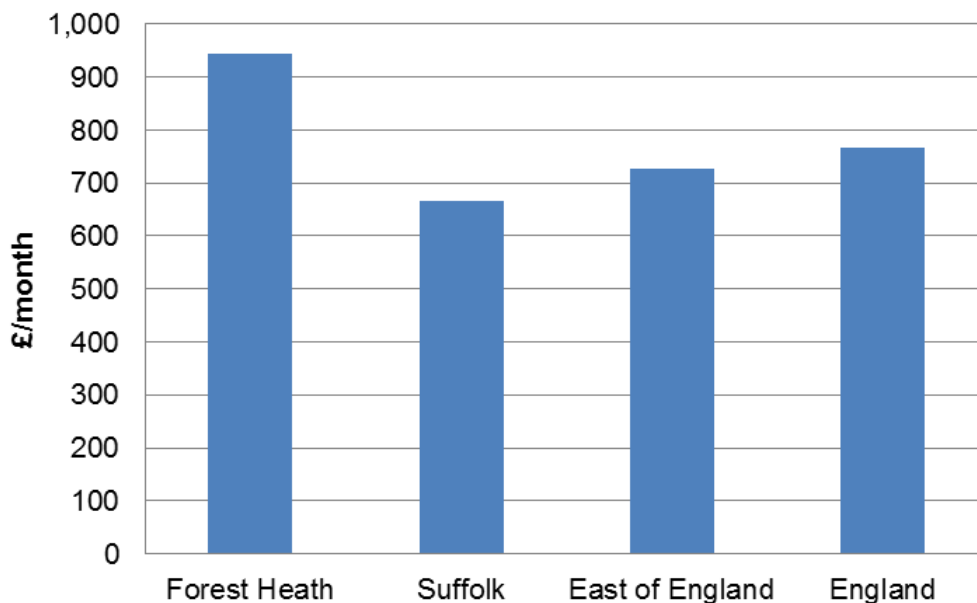
## Market rents

- 4.5 Official data on market rents are only available for a short period, from 2011 to 2015, and subject to major caveats. The ONS web page that provides these data warns:

*'The sample used to produce these statistics is not statistical[ly valid?] and may not be consistent over time. As such these data should not be compared across time periods or between areas.'*

- 4.6 Ignoring this warning, the chart below shows rents for Forest Heath and comparator areas for 2014-15.

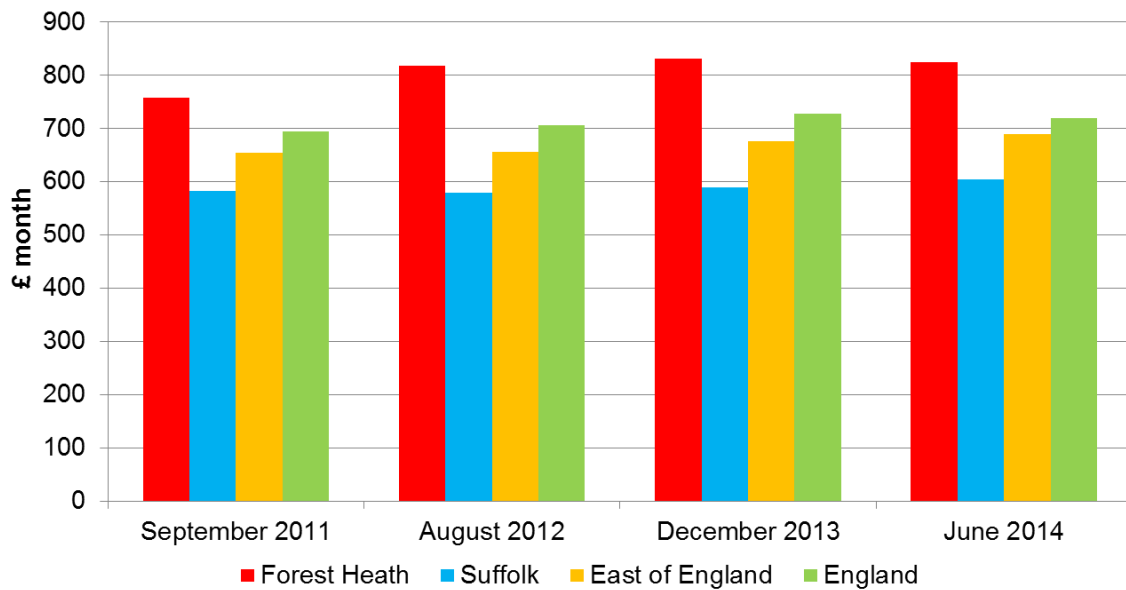
**Figure 4.2 Market rents, 1 April 2014 - 31 March 2015**



Source: ONS

- 4.7 Rents in Forest Heath, at £943 per month, are considerably above the comparator areas. The district's comparative position was similar at other dates, as shown in Figure 4.3.

**Figure 4.3 Market rents, selected dates**



Source: ONS

4.8 As well as being unusually expensive, the private rented sector in Forest Heath is unusually large. Official statistics show that 24% of dwellings in the district are privately rented, against 15-17% in the comparator areas. It seems clear that the unusually high rents and the unusually high prevalence of private renting are due to the same cause: demand from members of the United States Air Force in Europe (USAFE) and their dependents who choose to live off-base. USAFE personnel receive grants to cover their rent<sup>7</sup>. At a recent engagement workshop, the following comments were recorded:

- ‘... letting agents confirmed that landlords (i.e. property owners) had asked them for advice regarding the current level of demand on private rental properties and an estimation of what this demand would be after the closure of RAF Mildenhall. Letting agents were concerned that the timeline and plans for USAFE withdrawal from RAF Mildenhall were not available and therefore they were unable to advise and reassure landlords without access to this information. Developers and potential investment buyers of new properties (i.e. as buy-to-let) would also want the same information. The impact on existing planned schemes was also queried by one of the groups.’
- ‘There was a view that the cost of renting a property in Forest Heath and surrounding districts is inflated due to the high living allowance received by USAFE personnel. It was therefore predicted that any drop in rental prices due to the net loss of USAFE personnel could have a positive impact on the housing market as rents would become more affordable for civilians. However, the letting agents would have to manage this change and rent expectations with private

<sup>7</sup> See <http://www.housing.af.mil/raflakenheath/referralandrelocation/index.asp>



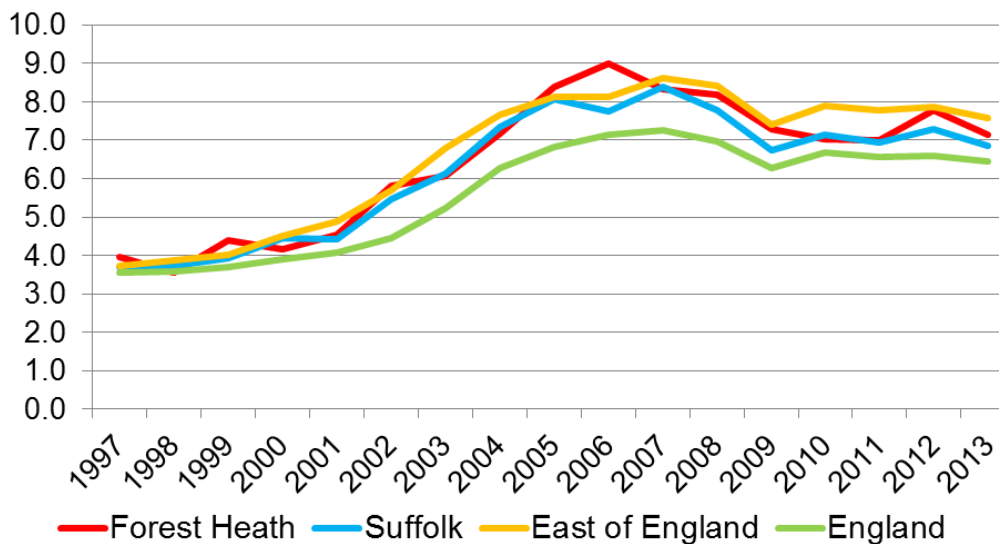
*rental landlords, to avoid a loss of confidence and supply, or houses sitting empty.<sup>8</sup>*

4.9 In summary, there is a dual housing market in Forest Heath. House prices are relatively low, reflecting the ability to pay of the indigenous population, whose earnings are low as we discuss later. But rents are relatively high, reflecting the allowances available to USAFE personnel, which can be used to rent but not to buy property.

## Affordability

4.10 Affordability, as defined by CLG and referred to in the PPG, is the ratio of lower-quartile house prices to lower-quartile earnings. A high ratio indicates low affordability, where the cheapest dwellings are less financially accessible to people on the lowest incomes. Figure 4.4 shows the index for the study area and comparator areas since 1997.

**Figure 4.4 Housing affordability**



4.11 The latest data available are for 2013. They show affordability in Forest Heath slightly worse than for England, virtually equal to Suffolk and slightly better than the East of England region. Against the England benchmark, the slightly worse affordability in Forest Heath is due to lower earnings rather than higher prices. As shown earlier house prices are below the national average, but residents' earnings are even further behind. In 2014 the average hourly pay for all employees resident in the district was £11.77 and the lowest quartile stood at £7.11, while the equivalent numbers for England were £15.36 and £8.19<sup>9</sup>.

4.12 The chart also shows changing affordability over time. In all areas affordability worsened in the boom as house prices rose faster than earnings, and improved in the

<sup>8</sup> [http://www.westsuffolk.gov.uk/Business/RAF\\_Lakenheath\\_and\\_Mildenhall/upload/Impact-on-homes-26Feb15-150326.pdf](http://www.westsuffolk.gov.uk/Business/RAF_Lakenheath_and_Mildenhall/upload/Impact-on-homes-26Feb15-150326.pdf)

<sup>9</sup> Source: ONS



recession as house prices fell more slowly than earnings and recovered sooner. During the boom affordability in Forest Heath, Suffolk and the East of England worsened more than in England; again this seems due to differences in earnings rather than house prices. In the recession the different areas moved closer together and in the recovery they changed roughly in parallel.

- 4.13 To sum up, affordability in Forest Heath is slightly worse than for England (though not the East of England and Suffolk) and has been so since the early 2000s. The reason is not that houses in the district are relatively expensive (they are not) but that residents' earnings are relatively low.

## Overcrowding and concealed families

- 4.14 At the 2011 Census 4% of dwellings in Forest Heath were overcrowded – a greater proportion than Suffolk and the East of England but less than England. Since 2001 overcrowding had fallen in all areas, but the comparative position of the different areas had not changed.

**Table 4.1 Occupancy of dwellings, 2001 and 2011**

	Forest Heath		Suffolk		East of England		England	
	2001	2011	2001	2011	2001	2011	2001	2011
Under-occupied	77%	73%	82%	76%	78%	72%	75%	69%
Evenly occupied	18%	23%	14%	21%	16%	24%	18%	27%
Over-occupied	5%	4%	4%	2%	5%	3%	7%	5%

Source: ONS

- 4.15 At the 2011 Census 1% of families in Forest Heath were concealed families – which means couples (with or without children) or single parents of dependent children living in someone else's household. The prevalence of concealed families in the district was the same as Suffolk and the East of England, but less than in England. There are no comparable data from the previous Census.

**Table 4.2 Concealed families, 2011**

	Forest Heath	Suffolk	East of England	England
All families	100%	100%	100%	100%
Concealed families	1%	1%	1%	2%
Unconcealed families	99.0%	99%	99%	98%

Source: ONS

- 4.16 For all areas the great majority of dwellings are over-occupied and the vast majority are families are unconcealed. Therefore the proportions of over-occupied dwellings and concealed families are tiny, and differences between areas are difficult to interpret. Even so, there is nothing in the statistics to suggest that Forest Heath has particularly underprovided housing land against demand or need.

## 5 AFFORDABLE HOUSING NEED

### National guidance

- 5.1 The PPG at paragraph 029<sup>23</sup> advises on how plan-makers should take account of affordable housing need:

*'The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.'*

- 5.2 To understand this advice, we need to be clear about the relationship between affordable and total need. This is a complicated issue, which is discussed at some length in the Planning Advisory Service (PAS) advice note on Objectively Assessed Need and Housing Targets<sup>10</sup>, which was written by Peter Brett Associates.

- 5.3 As discussed in the advice note, in the PPG affordable housing need is calculated separately from the OAN – which is overall need, covering all sectors of the housing market:

- The two numbers are not directly comparable, because the methods for calculating them are fundamentally different and they measure different things. While the OAN measures the expected demand for net additional dwellings, affordable need measures policy aspiration for affordable, units only', leaving aside the fact that if this aspiration was fulfilled the demand for market housing would fall.
- Logically, therefore, affordable need, as calculated at paragraphs 022-028 of the PPG, is not a component of the OAN. It cannot be combined mechanically to the OAN as calculated at paragraphs 015-021 of the PPG.
- Rather, affordable need is a separate consideration, which may lead Councils to increase housing targets above the OAN calculated earlier.
- In practice, for many areas there is no realistic prospect of meeting the affordable need in full, because affordable delivery is limited by the finance available from public funds and developer contributions, no matter how much land the planning authority allocates.

- 5.4 As the advice note also shows, the above view of the OAN has been generally supported by planning Inspectors (an especially clear discussion of the issue, not mentioned in the note, is in the Welford-on-Avon appeal decision, December 2012<sup>11</sup>).

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<sup>10</sup> Planning Advisory Service, Objectively Assessed Need and Housing Targets, Technical advice note, 2nd edition, July 2015

<sup>11</sup> APP/J3720/A/14/2217495.

It was arguably put in doubt by High Court judgments in the Satnam<sup>12</sup> and Oadby and Wigston<sup>13</sup> judgments, issued respectively on 19 February and 3 July 2015. But more recently it was reiterated in the King's Lynn High Court judgement issued on 9 July 2015<sup>14</sup>. In the King's Lynn judgment Mr Justice Dove 'respectfully disagrees' with an interpretation of the Oadby and Wigston judgment that suggests that affordable need is part of the OAN:

*'...The Framework makes clear [affordable housing] needs should be addressed in determining the full objectively assessed need (FOAN), but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice...'*

## The evidence for Forest Heath

- 5.5 In the case of Forest Heath, we are advised that the Cambridgeshire Research Group has updated its earlier assessment of affordable need across the housing market area, producing an estimate of 2,638 units over the plan period 2011-31. Policy CS9 of the adopted Core Strategy sets a target of 30% of the housing delivered should be affordable (with lower contributions on small sites and Primary and Secondary Villages). Bearing in mind these reduced contributions, the Council has estimated the most likely delivery from planned allocations made through the Site Allocations Local Plan is expected to be 27% affordable provision (this does not make allowance for provision coming forward through rural exception sites or 100% affordable schemes).<sup>15</sup>
- 5.6 Although Policy CS9 was set some years ago, we know that it is still deliverable from the recent CIL Viability Study<sup>16</sup>. The study splits the district into high, medium and low-value charge areas, according to house prices. It estimates that even in the low-value area all types of residential development can support affordable housing contributions in line with Policy CS9, as well as S106 and S278 contributions that fully mitigate the site-specific impacts of individual developments and still enable a positive CIL charge to be levied.
- 5.7 Over the plan period, if overall housing development over the plan period is in line with the OAN of 6,800 dwellings and 27% of this total is delivered as affordable units, 1,836 affordable units will be built. This is lower than the affordable need of 2,638 units. Therefore, in line with the PPG the Council should consider if it ought to lift its provision target above 6,800 dwellings.

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<sup>12</sup> *Satnam Millennium Ltd v Warrington Borough Council*, [2015] EWHC 370 (Admin), 19 February 2015

<sup>13</sup> *Oadby and Wigston Borough Council v Secretary of State for Communities and Local Government and Bloor Homes limited*, [2015] EWHC 1879 (Admin), 3 July 2015

<sup>14</sup> *Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government and Elm Park Holdings Ltd*, [2015] EWHC 2464 (Admin)

<sup>15</sup> See [http://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/SIR-to-CS-CS7-Technical-Paper.pdf](http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/SIR-to-CS-CS7-Technical-Paper.pdf)

<sup>16</sup> Peter Brett Associates for District Councils, *Forest Heath & St Edmundsbury CIL Viability Study*, forthcoming, February 2016

- 5.8 The answer depends partly on the district's sustainable supply capacity – an issue which has been considered in earlier consultation documents and is not revisited in the present report. It also depends on demand-side capacity, i.e. the capacity of the market to absorb additional housing. In the Welford-on-Avon appeal decision referenced earlier, the Inspector comments on this as follows:
- 'Neither the Framework, nor the planning guidance, expresses a preferred approach in relation to affordable housing. In coming to a view on this, I am mindful of advice in the planning guidance, that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. It goes on to advise that an increase in total housing figures should be considered where it could help deliver the required number of affordable homes. It seems to me, however, that this is likely to be a rare circumstance, since it begs the question, since the OAN will, in all likelihood, have captured the full demand for market housing, of who the purchasers be of the additional market houses would be, who would, in turn, be funding the additional affordable housing. If they were to come from outside District for instance, that could have implications in terms of the 'duty to cooperate'. For the purposes of this appeal, a pragmatic approach seems to me, to take a realistic view based on how much affordable housing can viably be provided as part of the overall OAN which may, or may not meet the assessed need for affordable housing. Even if it did not, I am not persuaded, for the reason set out above, that it would be necessarily appropriate to increase the OAN.'*
- 5.9 In other words, given that the OAN already includes all the demand for market housing, if the OAN were to be uplifted to pay for more affordable housing the Council should consider where market demand over and above the OAN would come from. The Eastleigh Inspector, also referenced earlier, raised the same question. He also answered it, pointing out that neighbouring Southampton had a small deficit of housing provision over objectively assessed need. Accordingly he recommended that Eastleigh should accommodate this cross-boundary unmet need, which would be an opportunity to provide some additional affordable units – though not to meet the affordable need in full, which would be unrealistic.
- 5.10 In the case of Forest Heath, no neighbouring authority, either in or beyond the HMA, has asked the Council to accommodate its cross-boundary unmet need. Indeed Forest Heath's partners in the HMA have agreed a Memorandum of Co-operation which does not require cross-boundary transfers. If Forest Heath nevertheless were to provide housing land in excess of its OAN, this could adversely affect demand and hence the take-up of allocated sites elsewhere in the HMA, contrary to the Memorandum and the wider Duty to Co-operate.
- 5.11 In summary, therefore, from a market perspective it does not seem advisable to lift overall housing provision above 6,800 dwellings in order to provide more affordable housing.

## 6 CONCLUSIONS

- 6.1 Our analysis of past provision and market signals suggests that there is little justification for an uplift to the demographic projections. In the base period whose trends the projections roll forward, 2007-12, the evidence mostly suggests that housing land supply has met demand. But there is one indicator that points in the opposite direction: the exceptionally high level of market rents, which is due to demand from USAFE personnel and their families. Arguably this could justify a 'market signals' uplift to the demographic projections, although the link between the private rented sector and overall housing provision is not clear. If the Local Plan had provided more housing land in the past we cannot be sure that the supply of rented housing would have been higher and rents would have been lower.
- 6.2 Even assuming that a market signals uplift is appropriate, it is difficult to determine the size of that uplift. The PPG provides no meaningful guidance on this::  
*'Market signals are affected by a number of economic factors, and plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period.'*<sup>21</sup>
- 6.3 Given that the PPG is silent, the only indications on the size of any uplift come from the Planning Inspectorate. Three Inspectors examining Local Plans have advised on this matter. We summarise their findings below.
- 6.4 In Eastleigh, the Inspector noted that affordability had worsened more than the national average and rents had risen more than the average (we cannot tell how Forest Heath compares, because it is not clear what periods the Inspector was referring to). On this basis he concluded that *'a cautious approach is reasonable bearing in mind that any practical benefit is likely to be very limited because Eastleigh is only a part of a much larger HMA... Exploration of an uplift [to the demographic projections] of, say, 10% would be compatible with the "modest" pressure of market signals'*.
- 6.5 In Uttlesford, the Inspector mentioned that house price increases had been slightly less than for Essex and England but from a very much higher base (for comparison, in Forest Heath house price increases have been less than comparator areas and from a much lower base). He also noted that median rents were higher than these comparators and had risen faster (the position Forest Heath is similar); and affordability had risen to a much higher peak prior to the recession (again Forest Heath is similar). *'Taking in the round'* these market signals as well as affordable need, the Inspector advised an uplift of 10%. He did not apportion the uplift between market signals and affordable need.
- 6.6 In Canterbury, the Inspector focused on three main market signals:
- Median house prices 12% above the national average (for comparison, as noted earlier Forest Heath house prices are well below the average);

- House price growth some 20 percentage points above the national average (again Forest Heath is below the average);
  - Affordability ratio consistently above the national benchmark - currently 9 against 6.5 for England (the ratio for Forest Heath is 7).
- 6.7 The Canterbury Inspector recommended an uplift of 30% to take account of these market signals, together with future jobs, affordable housing need and a post-recession recovery in national household formation rates. The Inspector noted that these four factors overlapped and did not apportion the uplift between them.
- 6.8 From the three cases discussed above we cannot draw definite conclusions about the correct market signals uplift for Forest Heath. This is partly because the evidence used in Eastleigh, Uttlesford and Canterbury is not directly comparable: the indicators used are not always the same, some are measured as absolute levels and others as rates of change, they refer to different dates and are compared with different benchmarks. A further difficulty is that only one of the three Inspectors, in Eastleigh, provides an uplift for market signals alone. In the other two areas the adjustments they propose also take account of affordable need, future jobs and the impact of the recession on household formation.
- 6.9 In short, the size of any market signals uplift cannot be simply inferred from earlier examples; it also requires judgment. In our judgment the supply-demand imbalance reflected in the demographic projections for Forest Heath is less than for Eastleigh and Uttlesford and far less than for Canterbury. Therefore we suggest a market signals uplift of 5%.
- 6.10 On this basis the district's objectively assessed need is 6,800 net new dwellings over the plan period 2011-31, equal to 340 net new dwellings per annum (dpa). The discussion in Chapter 5 above suggests that it is not advisable to increase this number in order to meet more of the affordable housing need.
- 6.11 The objectively assessed need of 340 dpa is fractionally below the 350 dpa calculated in the Cambridge Sub-region SHMA (2013). This reduction will not have a significant impact on the demand-supply balance for the rest of the housing market area, as calculated by the SHMA and endorsed in the 2013 Memorandum of Co-operation. Given that the assessed need has not increased, there is no reason why Forest Heath would want to export unmet need to other parts of the HMA.



# Local Plan Working Group



Forest Heath  
District Council

<b>Title of Report:</b>	<b>Responses to consultation and engagement on the Core Strategy Single Issue Review (SIR), Site Allocations Local Plan (SALP), and Draft Infrastructure Delivery Plan (IDP)</b>	
<b>Report No:</b>	<b>LOP/FH/16/004</b>	
<b>Report to and dates:</b>	<b>Local Plan Working Group</b>	15 February 2016
	<b>Cabinet</b>	1 March 2016
<b>Portfolio holder:</b>	James Waters Portfolio Holder for Planning and Growth <b>Tel:</b> 0771621038 <b>Email:</b> <a href="mailto:james.waters@forest-heath.gov.uk">james.waters@forest-heath.gov.uk</a>	
<b>Lead officer:</b>	Marie Smith Strategic Planning Manager <b>Tel:</b> 01638 719260 <b>Email:</b> <a href="mailto:marie.smith@westsuffolk.gov.uk">marie.smith@westsuffolk.gov.uk</a>	
<b>Purpose of report:</b>	To note representations made on the Core Strategy Single Issue Review (CS SIR), the Site Allocations Local Plan (SALP) documents, and the Draft Infrastructure Delivery Plan (IDP) following consultation between August and October 2015, and endorse responses, comments and actions.	
<b>Recommendation:</b>	<p><b>It is <u>RECOMMENDED</u> that the Local Plan Working Group:</b></p> <p><b>(1) Notes the consultation responses to the Core Strategy Single Issue Review (CS SIR), Site Allocations Local Plan (SALP) and Infrastructure Delivery Plan (IDP); and</b></p> <p><b>(2) Endorses the comments and actions noted in the attached documents.</b></p>	
<b>Key Decision:</b>	<p><i>Is this a Key Decision and, if so, under which definition?</i></p> <p>Yes, it is a Key Decision - <input type="checkbox"/></p>	
<i>(Check the appropriate box and delete all those</i>		

that <b>do not</b> apply.)	No, it is not a Key Decision - <input checked="" type="checkbox"/>
<b>Consultation:</b>	<ul style="list-style-type: none"> <li>In accordance with Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, the Council's Statement of Community Involvement and Local Development Scheme.</li> </ul>
<b>Alternative option(s):</b>	<ul style="list-style-type: none"> <li>Options for progressing the SIR and SSA Local Plan Documents were considered by LPWG on 16 October 2014.</li> <li>Housing Options Paper was considered and endorsed by LPWG on 22 April 2015.</li> <li>CS SIR and SSA Local Plan Documents and the accompanying SEA/SA and supporting documents were considered by LPWG on 30 June 2015 and agreed by Cabinet on 14 July for consultation.</li> <li>Working Papers 1, 2, and 3 set out summary representations and responses to the Issues and Options consultation of the Core Strategy Single Issue Review, the Further Issues and Options Site Allocations Local Plan, and the Draft Infrastructure Delivery Plan held concurrently between August and October 2015.</li> </ul>
<b>Implications:</b>	
Are there any <b>financial</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any <b>staffing</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any <b>ICT</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any <b>legal and/or policy</b> implications? If yes, please give details	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> There is a requirement for Local Planning Authorities to produce a Local Plan and Sustainability Appraisal and to undertake consultation during its preparation under the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011 and the Town and Country Planning (Local Planning) Regulations 2012.
Are there any <b>equality</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>



<b>Risk/opportunity assessment:</b>		The Local Development Scheme includes a risk assessment of issues that could affect the Councils ability to deliver the Local Plan(s) in accordance with the programme. Actions to manage the risks have also been identified. Failure to take into account any representations made at the 2 <sup>nd</sup> Regulation 18 ('Issues and Options') consultation stage may result in an unsound Plan or legal challenge.	
<b>Risk area</b>	<b>Inherent level of risk (before controls)</b>	<b>Controls</b>	<b>Residual risk (after controls)</b>
Significant public opposition	High	Local Plan documents have the potential to be highly contentious. Whilst every effort will be made to build cross-community consensus, there is a high risk of significant public opposition.	Medium
Loss of Staff	Medium	The structure and staffing levels within the Place Shaping Team will be constantly monitored and reviewed to ensure that the appropriate level of skills and resources are maintained.	Low
Financial shortfall	Medium	In the short/medium term, the Council has allocated funds through its Financial Services Planning process to allow for the preparation of the Local Plan. In the longer term, should costs increase, a review of the financial allocation will be required.	Low
Changing Political Priorities	Medium	Proposals are discussed with Members of all parties via a variety of means, the Local Plan Working Group etc.). This helps build consensus and reduces the likelihood of wholesale change of direction from local politicians.	Low
Legal Challenge	High	As a measure of last resort anyone may issue a legal challenge within six week of adoption of the Local Plan. Officers will continue to seek to ensure that local plan documents are prepared within the legal framework in order to reduce the risk of successful legal challenge.	Medium
<b>Ward(s) affected:</b>		All Wards in the District.	
<b>Background papers:</b> <i>(all background papers are to be published on the website and a link included)</i>		<p>Forest Heath Core Strategy Development Plan Document (May 2010).  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm</a></p> <p>Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2012.  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fhcorestrategysinglei">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fhcorestrategysinglei</a></p>	

	<p><a href="#">ssuereview.cfm</a></p> <p>Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2015 <a href="http://www.westsuffolk.gov.uk/fhlocalplan">www.westsuffolk.gov.uk/fhlocalplan</a></p> <p>Forest Heath Site Allocations Local Plan – Further Issues and Options 2015 <a href="http://www.westsuffolk.gov.uk/fhlocalplan">www.westsuffolk.gov.uk/fhlocalplan</a></p> <p>Forest Heath Draft Infrastructure Delivery Plan to 2031 - Consultation draft 2015 <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/2015-07-15-Final-Version-Draft-IDP-2.pdf">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/2015-07-15-Final-Version-Draft-IDP-2.pdf</a></p>
<p><b>Documents attached:</b></p>	<p>Summaries of responses to the following documents with officers’ comments and actions:</p> <ul style="list-style-type: none"> <li>• <b>Working Paper 1:</b> Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2015 (<i>169 pages</i>)</li> <li>• <b>Working Paper 2:</b> Forest Heath Site Allocations Local Plan – Further Issues and Options 2015 (<i>540 pages – due to the size of this Working Paper this is not attached to this report, but can be viewed electronically by clicking on the link below:</i>  <a href="#">Local Plan Working Group - 15 February 2016 - Agenda Papers</a>  <i>A paper copy of Working Paper 2 can be made available on request. Some paper copies of this Working Paper will also be available at the meeting.</i>)</li> <li>• <b>Working Paper 3:</b> Forest Heath Draft Infrastructure Delivery Plan to 2031 - Consultation draft 2015 (<i>30 pages</i>)</li> </ul>

## **1. Key issues and reasons for recommendation(s)**

### **1.1 Background**

- 1.1.1 The Core Strategy Single Issue Review (CS SIR) revisits the quashed parts of the 2010 Core Strategy as well as reassessing overall housing need/numbers to ensure compliance with the National Planning Policy Framework (NPPF). An 'Issues and Options' (Regulation 18) consultation was completed on the Core Strategy SIR in July to September 2012, with a second Issues and Options (regulation 18) consultation taking place between August and October 2015.
- 1.1.2 An Issues and Options draft of the Site Allocations Local Plan (SALP) was prepared but did not proceed to consultation in 2013. A Further Issues and Options (Regulation 18) draft was completed, and consultation took place concurrently with the SIR between August and October 2015.
- 1.1.3 A first draft of an Infrastructure Development Plan (IDP) was prepared to accompany the Issues and Options consultation drafts of both the Single Issue Review (SIR) of Core Strategy Policy CS7 – Overall Housing Provision and Distribution, and the Site Allocations Local Plans. The IDP will be updated and refined as the local plan documents progress through the planning process (to the Preferred Options and Submission draft stages). Consultation took place on this first draft of the IDP concurrently with the regulation 18 consultations on the SIR and SALP between August and October 2015.
- 1.1.4 Paragraph 155 of the National Planning Policy Framework (NPPF) advises:

*"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."*

*The accompanying guidance in the National Planning Practice Guidance (NPPG) notes that "Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications."*

- 1.1.5 The Forest Heath and St Edmundsbury Statement of Community Involvement (SCI) was adopted in February 2014. The SCI contains a statement of intent to engage with our communities – part of a wider commitment made by the councils to create and maintain effective working relationships with all sectors of the community. The document sets out the key stages in preparing a local plan document, and the protocols that all local authorities must follow. The SCI states the

councils' intention to go well beyond the minimum requirements for consultation. The 'Issues and Options' stage concludes, "we must take into account any representations made to us at this 'Issues and Options' stage."

## **1.2 Consultation responses**

- 1.2.1 Responses to all three documents have been received from statutory consultees, such as the Environment Agency, Historic England, Natural England etc., town and parish councils, interest groups, and individual residents and landowners.
- 1.2.2 There were a total of 364 representations (of support, objection, or comments) from 98 respondents to the Core Strategy Single Issue Review of CS7.
- 1.2.3 There were 893 representations on the Site Allocations Local Plan Further Issues and Options document from 133 respondents.
- 1.2.4 Eleven people responded to the Draft Infrastructure Delivery Plan submitting 46 representations.
- 1.2.5 The attached documents set out summaries of all the responses received to the SIR, SALP and IDP documents that were the subject of an eight week consultation period between August and October 2015, together with officer responses and comments and/or actions on each.
- 1.2.6 Consultation responses to the Sustainability Appraisal and the Habitats Regulations Assessment will be considered by the Council's Consultants preparing these documents, and will be addressed as part of the next iteration of each of these documents.

## **2. Next Steps**

- 2.1 Following this Local Plan Working Group, and the meeting on 18 February 2016, the final CS SIR and SALP documents will be taken for approval for consultation by Cabinet on 1 March 2016.
- 2.2 The design and printing of the documents will take a further few weeks from the Cabinet meeting; therefore consultation is planned from 4 April until 8 June 2016.
- 2.3 Comments received during this next consultation will be considered and brought back to the Local Plan Working Group before being fed into the final consultations for both the Site Allocations and Core Strategy Single Issue Review in late summer/autumn 2016. Submission of the documents for independent examination will follow in December 2016.

# Single Issue Review (SIR) of Core Strategy Policy CS7 - Further Issues and Options (2nd Regulation 18 Stage)

## Public Participation Report

1. What is this consultation about?

1.1-1.5

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
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### 1. What is this consultation about?

#### 1.1-1.5

23167 - Norfolk County Council (Ms Laura Waters) [11365]	Comment	Single Issue Review (SIR) of Core Strategy Policy CS7 further Issues and Options Regulation 18 stage and Site Allocations Local Plan further Issues and Options document: Norfolk Council will expect to work closely with adjoining authorities on the delivery of major infrastructure with particular focus at Brandon.	Comments noted. We will continue to work with Norfolk County Council as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.
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23166 - Mr Colin Hendley [12644]	Object	<p>I've spent the past hour trying to find a form on your website to voice my objections to the policy of solving perceived housing shortage by yet more new developments without considering the infrastructure shortfalls or the affect on the general quality of life of residents.</p> <p>Although I've not been able to locate the 'comments' form please register this email as my objection to your / government policy of building more housing on greenfield sites and squeezing more houses onto what are now one residence sites.</p>	<p>The difficulties you experienced in finding the forms has been noted, and we will ensure better sign posting on the website during the next consultation.</p> <p>The comments in relation to building on greenfield sites are noted. There is a balance to be struck between meeting the housing needs of the district and deciding on an appropriate housing distribution. Details on specific sites can be seen in the Site Allocations Local Plan preferred options document.</p>	None.
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#### 1.6

22963 - Mr Simon Thompson [12662]	Object	The IDP and IECA were both produced in 2009 and should be updated	The IDP is an iterative document and will updated at each stage of the plan process. Further details on the evidence base used to inform the SIR document can be seen in the report 'Local Plan Evidence Base' which will be available to view on the council's website during the next consultation period.	None.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23142 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Object	The IDP and IECA were both produced in 2009 and should be updated	The IDP is an iterative document and will updated at each stage of the plan process. Further details on the evidence base used to inform the SIR document can be seen in the report 'Local Plan Evidence Base' which will be available to view on the council's website during the next consultation period.	None.
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<i>1.7-1.8</i>				
23036 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	Paragraph 1.7 The Sustainability Appraisal rating of noise as a Red level "3" constraint is inappropriate and underplays the true degree of noise constraint. LPC recommends the constraint is revised to Red "4".  <i>Revision as above.</i>	Responses to the Sustainability Appraisal (SA) will be set out in the SA to accompany the SIR consultation.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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## ***2. The Single Issue Review process***

### ***2.1-2.7***

23037 - Lakenheath Parish Council (Ms C Shimmon) [12422]

Object

In the time it has taken the Council to move toward the Single Issue Review several events have arisen that affect Lakenheath that change the evidence basis in relation to Lakenheath and make it out of date.

Noted. The settlement hierarchy is set out under policy CS1 of the Core Strategy which is not being reviewed as part of the Single Issue Review.

It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.

*Removal of Lakenheath as a KSC.*

*Lakenheath allocations deferred until outcome of RAF Mildenhall & Lakenheath is fully known.*

23594 - Herringswell Parish Council (Su Field) [5165]

Object

2.6  
The council resolved to widen the scope of the SIR. It is the opinion of Herringswell Parish Council that the withdrawal of RAF Mildenhall is not considered in enough detail and that a full evaluation of the situation has not been considered through this document. The impact to the rental market in many of the rural villages including Herringswell will be momentous. Herringswell has an American occupancy of about 47%. The withdrawal of RAF Mildenhall personnel will obviously create a free fall in house prices, which could lead to a need for less affordable housing and an increase in available market housing.

It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>3. Evidence of local housing needs</b>				
<b>3.2-3.4</b>				
23592 - Herringswell Parish Council (Su Field) [5165]	Object	3.2 The SHMAA has failed to address the impact of the withdrawal of the airbase on local housing prices and the rental market. The consultation has failed to run scenarios or to predict any patterns for future possibilities.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath.	
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<b>3.5-3.9</b>				
23125 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	3.8-3.9 - See Response to Question 1	Four housing growth target options were considered in developing the further issues and options SIR. This would considered a reasonable number to assess through the local plan consultation, the SA and HRA. In developing the preferred option the council took account of the SA, HRA, SHLAA, SHMA, consultation responses and other relevant considerations which have led to setting of an appropriate housing target.	
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22739 - West Row Action Group (Mr John Smith) [12494]	Comment	In order for rural communities such as ours to survive affordable housing is critical . At the moment developers are targeting us with schemes of top end housing and only including a small affordable element to comply with regulations .To look for larger numbers of affordable houses at this early stage is sensible .	noted	
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23151 - Newmarket Horsemen's Group (NHG) [11392]	Object	3.7  The Council states that 2,703 new affordable homes is higher than can be delivered on 7,000 homes through the Core Strategy. Policy CS9 of the Core Strategy requires between 20% and 30% affordable housing depending on the size of the scheme and based on a viability assessment dated 2009. The NHG is concerned that there is a lack of reference to any up-to-date viability work to assess whether it is possible to deliver 38% of the 7,000 target as affordable housing. Such a target would deliver the 2,703 affordable units identified in the latest SHMA. The NHG has been unable to find any update to the 2009 viability work on the Council's website and so can only assume that no such update has been undertaken. As the housing market has improved significantly since 2009 the NHG considers that such an update is essential to justify any increase to the housing target beyond that set out in the latest SHMA. The failure to undertake this work undermines the Council's identified need to consider an alternative housing target.  The NHG notes that the interim Sustainability Appraisal refers to the review of past rates of affordable housing delivery and suggests that such rates will be continued. It is unclear how this assumption can be made without any updated viability work. It also disregards the potential for schemes to come forward that are 100% affordable housing and also the fact that future housing will be plan-led and based on allocations that have been viability tested.	Peter Brett Associates were appointed by the council to undertake an assessment of market signals in relation to the OAN and affordable housing need in January 2016. This advises that the target of 30% affordable housing is still deliverable. The technical paper which supports the SIR (2015) give a detailed account of likely delivery of affordable housing in the district over the plan period, having regard to 100% affordable schemes.	
23593 - Herringswell Parish Council (Su Field) [5165]	Object	3.6  The district is heavily constrained and would face significant challenges to even meet the lower housing target	noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>3.10-3.12</i>				
23126 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	Following a review of the background evidence, SIR Interim Sustainability Appraisal and HRA Screening, a proposed alternative distribution option is proposed below. This option proposes a more even distribution of growth across the three Towns and higher growth in the least constrained Primary Villages with infrastructure capacity. FHDC should also consider allocating sites to deliver in excess of the final housing requirement to provide a buffer for lack of implementation, particularly where there is a reliance on large sites, which are slower to deliver than a number of smaller/medium size sites and have a longer lead in time due to infrastructure requirements. See full response for further details.	noted. The SIR 2015 sets out how the distribution options were selected and how evidence has informed the preferred options as set out in the draft SIR 2016.	
22740 - West Row Action Group (Mr John Smith) [12494]	Comment	To underplay the impact of the closure of the base and the effect on the housing market would be a massive mistake . Large sections of the rental market will inevitably collapse . Planning for the worst possible scenario will at least give us a chance .	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
23143 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Object	3.12 Difficult to know the housing target until it is confirmed what is happening with RAF Mildenhall	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. This along with other evidence will inform the setting of the housing provision target.	
22935 - Mr Richard Ward [12658]	Object	3.12 With RAF Mildenhall now in the picture for future development the housing target should be reconsidered  3.15 The impact of RAF Mildenhall's availability for housing need should equate to possible housing provision. Where is this option in this document  <i>The impact of the closure of RAF Mildenhall must be considered now in relation to the affordable housing need and possibly the overall housing need.</i>	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23203 - Five Villages Preservation Trust (Dr Allan Marchington) [5854]	Object	* The impact of the removal of RAF Mildenhall has not been covered in enough detail in the document. The impact will be far reaching into the rural villages especially and we believe this should be given much greater importance	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
23045 - Racehorse Owners Association (Mr Richard Wayman) [12670]	Object	3.12 Given that the future of RAF Mildenhall will impact on affordable housing, it is illogical to determine the relevant housing target before the future of Mildenhall is known	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
22979 - Newmarket Racecourses (Ms Amy Starkey ) [6377]	Object	3.12 Any potential development at RAF Mildenhall will impact so significantly the districts housing requirements, therefore how can these decisions be made until a definitive decision has been made regarding RAF Mildenhalls future	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
22964 - Mr Simon Thompson [12662]	Object	3.12 - Difficult to know the Housing target until it is confirmed what is happening with RAF Mildenhall.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
23067 - Bedford House Stables (Luca Cumani) [12674]	Object	3.12 the council recognises that as yet no plans have been made concerning the future of RAF Mildenhall. Surely no decision regarding housing targets can be made until the future of RAF Mildenhall has been made clear	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible for this to inform the overall housing provision in the Core Strategy Single Issue Review.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23210 - Mr James Fanshawe [6676]	Object	3.12 A decision about the future use of RAF Mildenhall must be reached before overall housing need of the district can be accurately assessed.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath.	
23039 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	<p>Paragraphs 3.10-3.13</p> <p>These paragraphs deal with continued operations at RAF Mildenhall and USAF at Lakenheath. As set out below, LPC make detailed submissions in relation to this uncertainty, the impact on known noise constraints and the impact on air safety. Recent information suggest there is a greater degree of uncertainty over these changes in personnel and military assets and it is appropriate in the circumstances of uncertainty to defer allocations in Lakenheath until there is certainty. Lack of certainty on key allocations would render the allocations in Lakenheath unsound.</p> <p><i>Allocations for Lakenheath should be deferred until certainty is known on outcome of RAF Mildenhall &amp; Lakenheath.</i></p>	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	
22836 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Object	how can any decision be made if we don't know the future of RAF Mildenhall	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	
22966 - Ms Sara Beckett [6689]	Object	<p>3.12 RAF Mildenhall should be considered against the housing target which therefore needs to be re-considered.</p> <p>3.15 Where is the option to take into account RAF Mildenhall</p> <p><i>Take RAF Mildenhall into account as an option either solely or as an addition</i></p>	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23584 - John Gosden Racing LLP (Mr John Gosden) [12700]	Object	3.12 The council has confirmed that the future of RAF Mildenhall will have an impact on the affordable housing need and possible the overall housing need of the district. Until a decision on the future of RAF Mildenhall has been decided how can the council consider what the relevant housing target should be.	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	
22925 - Mr Justin Wadham [12641]	Object	As the council has already confirmed that the future of RAF Mildenhall is directly relevant where the requirement for affordable housing is concerned, the council cannot possibly consider what the relevant housing target would be until a decision has been made about the future of Mildenhall	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
22879 - Mrs Lucy Wadham [12642]	Object	As the council has already confirmed that the future of RAF Mildenhall is directly relevant where the requirement for affordable housing is concerned, the council cannot possibly consider what the relevant housing target would be until a decision has been made about the future of Mildenhall.	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>3.13-3.14</i>				
23040 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	<p>Paragraphs 3.10-3.13</p> <p>These paragraphs deal with continued operations at RAF Mildenhall and USAF at Lakenheath. As set out below, LPC make detailed submissions in relation to this uncertainty, the impact on known noise constraints and the impact on air safety. Recent information suggest there is a greater degree of uncertainty over these changes in personnel and military assets and it is appropriate in the circumstances of uncertainty to defer allocations in Lakenheath until there is certainty. Lack of certainty on key allocations would render the allocations in Lakenheath unsound.</p> <p><i>Allocations for Lakenheath should be deferred until certainty is known on outcome of RAF Mildenhall &amp; Lakenheath.</i></p>	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAF from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
<i>3.15</i>				
22897 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Object	Given the about there might be more than two options for housing	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAF from the Mildenhall base and location of additional personnel at RAF Lakenheath. Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift.	
23069 - Bedford House Stables (Luca Cumani) [12674]	Object	With regards to section 3.12 it is not clear how the council considers there to be only 2 options for housing provisions	Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23211 - Mr James Fanshawe [6676]	Object	3.15 A decision about the future use of RAF Mildenhall must be reached before overall housing need of the district can be accurately assessed.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
23585 - John Gosden Racing LLP (Mr John Gosden) [12700]	Object	Why is RAF Mildenhall not included by the council in the realistic options for housing provision?	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible for this to inform the overall housing provision in the Core Strategy Single Issue Review.	
22926 - Mr Justin Wadham [12631]	Object	bearing in mind the RAF Mildenhall issue, the council cannot possibly only consider there to be two realistic options for housing provision.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift.	
22980 - Newmarket Racecourses (Ms Amy Starkey ) [6377]	Object	The presentation of only two options does not address the issue of RAF Mildenhall as above	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23046 - Racehorse Owners Association (Mr Richard Wayman) [12670]	Object	it is not explained why the council believes there are only two realistic options for housing.	Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. The technical paper supporting the consultation explains in further detail why only two were taken forward.	
22880 - Mrs Lucy Wadham [12642]	Object	Bearing in mind the RAF Mildenhall issue, the council cannot possibly only consider there to be two realistic options for housing provision	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift.	
23754 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Object	In light of the above it is unclear how the council considers there to be only two realistic options for housing provisions	Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift.	
22965 - Mr Simon Thompson [12662]	Object	In light of the above it is unclear how the Council considers there to be only two realistic options for housing provision.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift.	
22741 - West Row Action Group (Mr John Smith) [12494]	Support	Option 2	noted	



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Option 1</i>				
23127 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	See Response to Question 1	Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. Option 2 proposed an uplift to address more of the affordable housing need, it was appropriate to consult on this level of growth in accordance with the requirement of NPPG. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift. The SHMA update has been prepared by Cambridge Research Group (CRG) for a number of other authorities in the HMA ensuring a consistent approach. The preferred option for growth to be consulted upon plans to meet the needs identified in the SHMA update and thereby accords with the M of U in so far as the district will plan to meet its own needs. Alongside the technical paper the SHLAA and the SA provide the evidence on the availability, suitability and deliverability of sites to meet the identified needs.	
23133 - Newmarket Horsemen's Group (NHG) [11392]	Object	3.17  In light of the comments above the Council cannot confidently predict that the inevitable consequence of the 7,000 figure is that the Council will 'fall short of meeting the full or more of the affordable needs in the district'.	Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift. The SHMA update has been prepared by Cambridge Research Group (CRG) for a number of other authorities in the HMA ensuring a consistent approach. The preferred option for growth to be consulted upon plans to meet the needs identified in the SHMA update and thereby accords with the M of U, to meet the identified needs of the district.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Option 2</i>				
23128 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	See Response to Question 1	Four options for housing growth were considered in developing the further issues and options to the SIR, two options considered to be reasonable were taken forward to the consultation. Option 2 proposed an uplift to address more of the affordable housing need, it was appropriate to consult on this level of growth in accordance with the requirement of NPPG. In light of the SHMA (2016) update a preferred option for growth will be consulted upon, which addresses the OAN and includes within it an uplift. The SHMA update has been prepared by Cambridge Research Group (CRG) for a number of other authorities in the HMA ensuring a consistent approach. The preferred option for growth to be consulted upon plans to meet the needs identified in the SHMA update and thereby accords with the M of U in so far as the district will plan to meet its own needs. Alongside the technical paper the SHLAA and the SA provide the evidence on the availability, suitability and deliverability of sites to meet the identified needs.	
23153 - Newmarket Horsemen's Group (NHG) [11392]	Object	In light of the comments above the Council cannot confidently predict that the inevitable consequence of the 7,000 figure is that the Council will 'fall short of meeting the full or more of the affordable needs in the district'.	The technical report prepared at the further issues and options consultation illustrates that there is likely to be shortfall in meeting the full identified affordable housing need over the plan period.	
22556 - Mr David Haiselden [12544]	Support	I prefer this option	noted	

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*Question 1*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23129 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	<p>Option 1 (350 dpa 2011-2031) should be discounted as it would only provide a comparable annual build rate to the average rate for the past 10 years (342dpa), and is a lower rate of residual build to the adopted Core Strategy for the years 2011-2031 (371dpa), providing a total of 420 fewer dwellings in this period. Option 1 would therefore not be in accordance with the NPPF paragraph 47 to "boost significantly the supply of housing".</p> <p>The 10% uplift in Option 2 to secure additional affordable dwellings has been justified in the SIR by reference to what has been deemed acceptable by Inspectors for other local authority areas. This option still only provides an additional 280 dwellings during the period 2011-2031 than the adopted Core Strategy and only 210 more affordable dwellings than Option 1. As the Core Strategy (2010) preceded the NPPF (2012), more work should be undertaken to test whether an increase over 10% of the SHMA figure could be accommodated to significantly boost the supply of housing.</p> <p>The SIR Technical Paper considered an option (Option 4) to enable the delivery of the full objectively assessed affordable housing need of 2703 dwellings, which would require a total housing provision of 9700 dwellings based on achieving 30% affordable provision under CS Policy CS9. This Option would represent an increase of 39% over the SHMA figure. This option was not tested in the SIR Interim Sustainability Appraisal or SIR HRA Screening but the LPA discounted it as they concluded the rate of growth would not be deliverable due to the high rate of build and need for infrastructure. The SIR Technical Paper did not consider any intermediate options between 10% and 39%.</p> <p>Only the two options selected via the Technical Paper (referred to as Options 2 and 3; renamed as Options 1 and 2 in the SIR) were assessed in the SIR Interim Sustainability Appraisal and the SIR HRA Screening, where both options performed similarly. The Sustainability Appraisal states that Option 2 would be preferable in terms of housing objectives as identified affordable housing needs would be met to a greater</p>	<p>Four housing growth target options were considered in developing the further issues and options SIR. This would considered a reasonable number to assess through the local plan consultation, the SA and HRA. In developing the preferred option the council took account of the SA, HRA, SHLAA, SHMA, consultation responses and other relevant considerations which have led to setting of an appropriate housing target.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>extent and it might lead to additional opportunities in terms of other community and economic objectives. It did not predict significant negative effects for Option 2 as it concluded there is the potential to mitigate against impacts on internationally important wildlife sites and other environmental effects.</p> <p>The SIR HRA Screening para 5.6 states that, as Option 1 provides for less housing during 2011-2031 than the Core Strategy, it is probable that significant effects from this option will not arise, and Option 2 is a small relative and absolute increase on the overall housing provision made by the adopted Core Strategy. The HRA Screening was unable to rule out likely significant effects from either of the housing provision options (due to the precautionary principle) but the HRA Screening results (Table 5.1) were the same for both options.</p> <p>The SIR HRA Screening recommended that the LPA should carry out HRA of housing distribution options and site allocation options to confirm that the options can be delivered without likely significant effects. It also recommended that further work is carried out as part of an Appropriate Assessment to agree with Natural England a zone within which recreational effects on Breckland SPA from residential development will be assumed to exist where contributions to mitigation will be required (secured under Policy DM12) unless the applicant can demonstrate otherwise through project level HRA; and key features of a mitigation and monitoring strategy, which the developer contributions will help to fund. If this advice is followed, the mitigation can be accounted for in the HRA Screening conclusions.</p> <p>As part of the HRA, the LPA should test further options providing an uplift in small increments over 10% (e.g. 15%, 20%), to provide the opportunity to conclude whether there is another reasonable alternative option between 7700 dwellings and 9700 dwellings that would enable the delivery of more affordable housing and provide a significant boost in housing supply within the environmental limits of the District.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23165 - Mr Derek Banks [6679]	Comment	<p>I have attempted to submit my comments on-line but, having requested a password reset which has failed to allow me to log in, I am making these comments by your less preferred option - email.</p> <p>Before making any specific comment on the document, it is puzzling that Lakenheath has been earmarked for such large amounts of development when there does not appear to be large numbers of people who would choose to live in Lakenheath. Steering people to an area, not of their choice, may not make for a very cohesive or inclusive neighbourhood.</p> <p>1. There appears to be no facility to amend village/town profiles as and when services change. Surely, this omission has to be addressed when considering sites for development? Lakenheath does not have the full range of services as detailed in this document. Additionally, the library has gone through difficult times, is its survival assured? The Post Office is in a similar position and, indeed, with the recent addition of Post Office vans, its current site seems to be inadequate for the business. Furthermore, rumours about the future of the only bank left in the village. Obviously, future planning cannot be swayed by rumour but Lakenheath has failed to secure any additional retail facility, despite ongoing attempts over many years. In such volatile economic times it is difficult to see any change on that front which would benefit Lakenheath.</p> <p>2. Forest Heath has always been portrayed as a "tourist" destination and Lakenheath, apart from lying in a unique environment twixt Fen and Breck, has the nationally renowned RSPB site, but, with the potential destruction of the natural wildlife corridor to the north/west of the village and the continuing saga at Lakenheath Hall, something which has lasted for 10 years and is a clear eyesore for anyone travelling to/from Lakenheath, who would want to spend any time in the village? A tourist destination surely warrants thoughtful and appropriate planning?</p> <p>3. Most of the proposed development fails to provide anything like adequate parking. As the village has been told on many occasions, the only public transport available - a bus service to either Thetford or</p>	noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Mildenhall, where if lucky there may be a connection onwards - is heavily subsidised and could, therefore, if money gets really tight, be withdrawn. The service is, in any event, totally inadequate for workers, and cars are not a choice but a necessity. Without any actual transport consultation why are developers still allowed to build without suitable parking facilities? Is it not easy enough to ascertain the number of cars per property and plan on a current basis? Car ownership is unlikely to diminish. Parking issues are a matter of concern to much of the village and a significant cause of anti social behaviour. Why has there been no attempt made to revitalise the use of Lakenheath railway station?</p> <p>4. Lakenheath is, at the current time, essentially a rural environment. Such an environment suggests space but the density of some of the proposed development put before the Parish Council in the last two years will be overwhelming to the surrounding properties. Furthermore, another cause of anti social behaviour, is high density housing. There is nothing creative or sympathetic in allowing development of such density that ones neighbour can be heard sneezing.</p> <p>5. The village does not cope, at the current time, with heavy rainfall. Eriswell Road has no adequate drainage in place and other trouble spots are :- Mill Road at its junction with the High Street; Wings Road; Back Street; Mutford Green at its junction with Station Road; Quayside Court at its junction with Station Road and Highlands. There are no doubt other areas but, with the exception of Back Street, the roads mentioned are the main thoroughfares.</p>		
23073 - Bedford House Stables (Luca Cumani) [12674]	Comment	<p>Neither option is supported due to the unclear future of RAF Mildenhall. The uncertainty of this area makes it impossible to have a clear picture of what the housing requirements are. Option 2 should be relied on until plans become clear for RAF Mildenhall. The council also recognises that the higher growth option will be difficult to deliver due to a number of constraints and therefore this option should be dismissed.</p>	<p>The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23212 - Mr James Fanshawe [6676]	Comment	Neither in light of the uncertainty over the future plans for RAF Mildenhall. If pressed for a preferred option then the lower option (in view of the above). The higher option - appears unworkable anyway - see 3.20 cons	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
22777 - Unex (No.3 ) Limited [12631]	Comment	The Council should plan for the higher growth of 7700 homes.	noted	



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23154 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>The Council must ensure that any alteration to the housing target suggested by the latest SHMA is based on up-to-date evidence, as required by the Planning Practice Guidance.</p> <p>The Council has committed to a Memorandum of Understanding with other authorities within the wider housing market area. That includes an agreement to specific housing targets across the Strategic Housing Market Area. The NHG is concerned that the suggested alternative figure of 7,700, which allows for a 10% increase to address more of the affordable housing need, is merely an arbitrary figure that is not reinforced by evidence to confirm that this is justified or necessary. In particular, there has not been any update to the 2009 Affordable Housing Economic Viability Assessment. In the absence of any such update it is not possible to state (as is the case at paragraph 3.8) that the proportion of affordable housing cannot be increased to 38% to address the identified affordable housing need.</p> <p>The NHG considers that the reliance on the research of longer term trends in affordable housing delivery as a means of justifying the need for an uplift (as evidence in the interim Sustainability Appraisal) is flawed. It disregards the impact of the last recession and the fact that future allocations will be subject to viability testing before adoption.</p> <p>Furthermore, the Council appears to have assumed that affordable housing will only be delivered as part of an open market scheme. This assumption overlooks the fact that some housing may be delivered as 100% affordable schemes - such as is planned for sites N/20 and N/33 - and that the Council has the ability to identify 100% affordable housing sites as part of the site allocation process.</p> <p>The NHG considers that in the absence of any up-to-date assessment the Council must maintain the target set out in the Memorandum of Understanding. Any departure from this figure must be reinforced by evidence to justify an alternative figure and such evidence must include an up-to-date assessment of both housing need and viability.</p>	<p>An update to the SHMA was published by Cambridge Research Group in January 2016 setting a revised overall OAN of 6800 dwellings over the period 2011 to 2031. Peter Brett Associates undertook research into market signals which helped to inform the SHMA and the setting of a preferred option housing provision target. This evidence states the 30% affordable housing target still remains appropriate. The technical paper which supported the further issues and options SIR evidenced the likely provision of affordable housing including 100% affordable schemes.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23178 - Tattersalls Ltd (Mr John Morrey) [5726]	Comment	<p>The lower option should be relied upon until such time as the council understands the implications of RAF Mildenhall or until it is in possession of more up to date evidence of what the housing need for the area is.</p> <p>Furthermore the council appears to have assumed that affordable housing will only be delivered as part of an open market scheme. This overlooks that some housing may be delivered as 100% affordable schemes - eg N/20 and N/33</p> <p>The council notes in paragraph 3.20 that the higher option will be difficult to deliver due to the significant environmental constraints in the district. This admission clearly indicates that the higher option cannot be selected and should therefore be disregarded.</p>	<p>The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known. The technical paper supporting the further issues and options SIR consultation assesses the number of affordable units likely to be delivered over the plan period, this includes 100% affordable schemes. The higher growth option of 7700 homes previously consulted on would have been difficult to deliver due to significant environmental constraint, this was listed under cons. It was not stated as not being possible but instead difficult.</p>	
22784 - Historic England (Mr Tom Gilbert-Wooldridge) [12636]	Comment	<p>Option 1 looks to provide 7,000 dwellings in the period 2011-2031, while Option 2 looks to provide 7,770 over the same period. We do not have preference for either option, as it will depend on the distribution and allocation of housing in terms of any impact on the historic environment. There is not a huge difference between the two options in terms of dwelling numbers, so it is perhaps difficult to state that Option 2 would cause a much greater impact on the environment than Option 1.</p>	<p>Noted, although it appears there is not a huge difference between the two options, given the environmental constraints of the district an additional 700 units is considered significant.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23123 - Warwick Hirst [12678]	Comment	<p>At present there are 455 people on the waiting lists for social housing in Newmarket .</p> <p>In addition there are 496 people wanting to change their social housing and to live in Newmarket. Clearly if these were all transfers no additional housing will be needed .I think at least 50% of the total will necessitate new houses</p> <p>Taking the 455 as the bare minimum. this gives at 30% a total need for 1500 homes ,just to clear the backlog. Adding another 250&lt;50% of 496&gt; gives a figure of 705</p> <p>At 30% affordable this equates to 2350 houses ,which is 117 houses per year for 20 years.This compares with 60 per year recently</p> <p>My submission is that the true need is at least 2350 houses for Newmarket if the Town is going to grow and to prosper</p>	The SHMA provides a detailed assessment of the OAN and affordable housing need for the district. Refer to the SHMA 2016 for the most recent assessment.	
23197 - Mr & Mrs B Rolfe [12682]	Comment	<p>We express a preference for Option 2 involving the higher level of growth for the following reasons:-</p> <ol style="list-style-type: none"> <li>1. We broadly favour concentrating growth within the central corridor of the District which would reduce the amount of housing to be directed towards Brandon in the north, and Newmarket in the south.</li> <li>2. There are opportunities to create a central hub of growth focusing on Mildenhall and its satellite villages as this part of the District is less constrained.</li> <li>3. Providing growth in the central corridor will assist in compensating for the closure of RAF Mildenhall and will enable a co-ordinated programme for the joint promotion of housing and employment provision to be implemented.</li> <li>4. We consider there are major opportunities to focus significant growth at Beck Row which is a favoured location for growth, as reflected in the current plethora of permissions, outstanding Applications and Land Bids.</li> </ol>	A preference is expressed for option 2 which is noted. Other comments relate to the distribution which is addressed separately.	

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23447 - Barton Mills Parish Council (Mr J Bercovici) [5059]	Comment	Question 1: Barton Mills Parish Council supports Option 1 for the total housing provision because, with environmental constraints affecting so much of Forest Heath, a higher target would be unrealistic.	Comments noted on environmental constraints of the district.	

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23614 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>The District Council must identify its objectively assessed needs within the Cambridge Housing Market Area and plan accordingly, giving recognition to environmental constraints on growth.</p> <p>In weighing up the different options for growth and meeting the challenge of balancing conflicting priorities, the District Council will consider a number of factors. The following are key issues from the perspective of the County Council and would ask the District to:</p> <ul style="list-style-type: none"> <li>- Consider the social role of housing, meeting the needs of all groups in the community. There are numerous links between health and housing, which are summarised in the Suffolk Health and Housing Charter led by the Suffolk Health and Wellbeing Board, in which the District Council is a participant.<sup>1</sup> The Government has also put the relationship between health and housing on a statutory footing through the Care Act 2014, which places a legal duty on local authorities to prevent, delay and reduce the need for health and care services.</li> </ul> <p>Whilst the challenges of meeting affordable housing need are recognised, the health problems associated with inadequate access to suitable, safe and healthy homes must be part of the assessment that the District Council makes in determining whether to increase its overall housing target.</p> <p>The District Council will be mindful of the point that, if the need for affordable housing is not met, it is logical to conclude that this will reduce choice for vulnerable people and, given that affordable housing is often built to higher accessibility standards than market housing, it will reduce the ability of vulnerable people to remain in their own homes as their health needs change.</p> <p>The National Planning Policy Framework (NPPF), in paragraph 17, states that the planning system should help to implement local strategies for improving health. The issues referred to above are relevant, but the County and District Councils also need to work together to assess and meet specific needs (see also paragraph 50 of the NPPF). The County Council</p>	noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>would be pleased to assist the District Council (as Housing and Planning Authority) to assess the need for housing for vulnerable people, and to discuss how the planning system can aid delivery to meet needs.</p> <p>A specific issue to be mindful of is the ageing population in Forest Heath, personalisation and funding changes in social care, which may encourage an increasing number of older people to remain in their own homes rather than moving into housing with care. This is relevant to housing supply, the consideration of overall 'objectively assessed need' and, potentially, to the Site Allocations document.</p> <p>- It is clear that the District Council is giving consideration to environmental constraints such as designated nature conservation sites. The overall housing target must recognise these constraints, and consider the potential cost of damage to the District's significant natural capital arising from inappropriate housing growth.</p> <p>Please let County Council officers know if any assistance can be provided in respect of the matters described above.</p>		
23102 - RSPB - Eastern England (Mr Mike Jones) [6257]	Comment	We have no preference for the most appropriate option for growth, provided that the Council is confident that the growth can be safely accommodated outside of the precautionary zones for the Breckland SPA (as indicated by the West Suffolk SHLAA - see section 6.1) and that the Council is able to ensure appropriate management of the recreational visitor pressure that will arise from the new housing (as identified in sections 6.4 - 6.7 of the accompanying HRA Screening report).	noted	
22775 - Tap Investments Limited [12632]	Comment	The Council should plan for the higher growth of 7700 homes.	noted	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22838 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Comment	We can't support either option until the future of Mildenhall is clear and we have more up to date housing information. Furthermore the council itself notes that the district has significant environmental constraints and therefore the higher option cannot be chosen	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
23594 - Herringswell Parish Council (Su Field) [5165]	Comment	We consider option 1 to be the most favourable, but we do not believe either of the 2 options are sustainable because the area is too constrained to offer the number of houses suggested. We believe a lower amount of housing than presented in either of the two options should be sort for the district, to compensate for the many constraints.  Option 2 is only deliverable if 'high growth' at Red Lodge is decided as the preferred choice. We believe this would not be sustainable. The landowner promoting site RL15 is the same one who has pursued the current development at Red Lodge. He negotiated minimal a affordable housing contribution of a mere 15% rather than the preferred policy level of 30% during the negotiations for the last 374 houses at Red Lodge. The developers' track record would suggest the council would experience the same issues in the future when building out RL15 and they would therefore continue to undersupply with their affordable housing targets.  It should also be noted that the site has been deferred through the SHLAA and so may not prove deliverable. The site is on good agricultural land (grade 3) and would result in a significant loss.	The SHMA update 2016 has indicated there is a need to provide a lower provision of 6800 dwellings. This figure will be used to inform the housing provision target for the district.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23586 - John Gosden Racing LLP (Mr John Gosden) [12700]	Comment	<p>NEITHER option is supported as the council cannot possibly understand the housing requirements for the future when it is still unclear what will be happening at RAF Mildenhall and what the implications of this will be.</p> <p>The lower option should be relied upon until such time as the council understands the implications of RAF Mildenhall or until it is in possession of more up-to-date information to confirm what the housing need for the area is.</p> <p>The council notes in paragraph 3.20 that the higher option will be difficult to deliver due to the significant environmental constraints in the district.</p> <p>This admission clearly indicates that the higher option cannot be selected and should therefore be disregarded.</p> <p>The Deloitte Report confirms that Newmarket is a national sporting asset which must be protected and treated with great care and respect considering its contribution to the national and local economy.</p> <p>This so called growth agenda will damage Newmarket, the Racing Industry and the local</p>	<p>The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.</p>	
22956 - Pigeon Investment Management Ltd [7169]	Comment	<p>The Council state in paragraph 3.2 that it is "not considered reasonable to consult on a higher growth option at this time. They state that the sites to achieve this growth are not available and the settlement constraints, including environmental constraints, equine protection policy, and large areas of flood plain make the higher growth options unachievable. We consider that the Council should consult on higher growth options as this consultation would allow these options to be properly tested.</p>	<p>The technical reports sets out 4 growth options, each are considered in turn and SA is undertaken for each. The higher growth option which meets all the affordable housing need is discounted for reasons set out the technical paper.</p>	
22919 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Comment	<p>Support Option 1 - 7000 'all homes' option</p>	<p>comments noted</p>	
23812 - Tuddenham St Mary Parish Council (Ms Vicky Bright) [5908]	Comment	<p>80% of new houses need to be affordable says the national statistics. Why is it that the target of 30% across forest Heath has been successfully achieved in the entire area but Red Lodge has only achieved 15% of affordable house building</p>	<p>Core Strategy policy CS9 set targets for affordable housing provision. Where evidence of viability issues have been clearly demonstrated, a lower provision may be acceptable.</p>	



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22782 - Newmarket Town Council (Mrs Isabelle Barrett) [5982]	Comment	<p>Following a detailed debate members recognised the need for social and affordable housing for people living and working in Newmarket. However, the Deloitte report, as commissioned by Forest Heath District Council, addresses the lack of infrastructure and open space and acknowledges that Newmarket is a national sporting asset which needs to be protected. Therefore, in light of prevailing circumstances members agreed that growth is a matter for careful consideration in due course.</p> <p>On behalf of Newmarket Town Council, I would like to thank you for giving our members the opportunity to comment on the Single Issue Review.</p>	noted	
23047 - Racehorse Owners Association (Mr Richard Wayman) [12670]	Comment	<p>Neither option is support whilst uncertainty remains over the future plans for the RAF Mildenhall site</p> <p>Until then, the lower option should be relied upon.</p> <p>The higher option would have significant environmental impacts in the district and should be rejected</p>	<p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible for this to inform the overall housing provision in the Core Strategy Single Issue Review.</p>	
22929 - Mr Justin Wadham [12671]	Comment	<p>As already stated, it is not possible for the council to understand the housing requirements for the future when it remains unclear what will be happening at RAF Mildenhall. The absolute pre-requisite is for the council fully to understand the implications of RAF Mildenhall or to obtain more up to date information before it can properly or responsibly assess the housing need for the area in other respects.</p> <p>The lower option have to be relied upon (a) for the reason already stated and (b) because the higher option, as the council acknowledges, it would be difficult to deliver due to significant environmental constraints in the district</p>	<p>The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAF from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.</p>	

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22968 - Ms Sara Beckett [6689]	Comment	The lower option is the only option without the addition of considering RAF Mildenhall or knowing what the true housing need is. Environmental constraints of the District exclude the higher option to be delivered. Therefore neither option is realistic or evidence based.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	

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23168 - R J Upton 1987 Settlement Trust [12681]	Comment	<p>The Landowner acknowledges the origin of the total provision figure of 7,000 new dwellings in Forest Heath District in the plan period 2011 to 2031. We also note the juxtaposition in paragraph 3.6 of this figure with that of a need over the same period for 2,703 affordable dwellings.</p> <p>This represents 38.6% of the currently proposed total provision of 7,000 dwellings, a percentage very close to that commonly sought (40%) in local plan policies for affordable housing, but less commonly achieved in practice, throughout England.</p> <p>The means by which most affordable housing is provided, that is, as a proportion of total dwellings on sites largely consisting of market housing, remains unchanged. EPS therefore firmly believes, as the Council itself hints at paragraph 3.7, that total provision of 7,000 dwellings will be insufficient to meet identified affordable housing needs.</p> <p>If total housing provision were to be increased to 7,700 dwellings, then 2,703 affordable units would still represent 35% of the total - slightly more easily achievable, but still challenging.</p> <p>The total provision figure should therefore indeed be "stretched", as paragraph 3.9 puts it, to at least 7,700 dwellings for the Plan period.</p> <p>In relation to the pros and cons identified under Option 1, The Landowner considers the first two advantages, relating to compliance with the SHMA, to be not significant. The grounds are that Forest Heath DC can reasonably review total housing provision in the District, even if it were not obliged to by the outcome of the legal challenge to the Core Strategy, without adversely affecting the ability of the other constituent authorities to carry out the proper planning of their own areas.</p> <p>The claimed advantage in the third bullet point would be entirely inconsistent with the Government's clear aim set out in paragraph 47 of the NPPF that the supply of housing should be significantly boosted.</p> <p>In our opinion, the identified disadvantage, of potentially failing to meet affordable housing needs, clearly outweighs the claimed advantages.</p> <p>In relation to the pros and cons identified for Option 2, The Landowner considers that a further advantage of this growth option would include a greater level of socio-economic benefits. The disadvantage stated in</p>	noted	

**Representations****Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action**

bullet point 4 is contrary to paragraph 5.4 of the consultation document which clearly states that there are a sufficient number of relatively unconstrained sites across the district to deliver the two options for growth.

House Prices and Earnings  
EPS has examined relevant data from NOMIS (National Online Manpower Information System) and the DCLG website.

The NOMIS Labour Market Profile shows that earnings for both residents of Forest Heath District and people working in it are significantly lower than the Great Britain and East of England averages. This applies to both men and women, with a greater disparity for women.

Data from Table 576 on the DCLG website are consistent with this. The ratio of lowest quartile house prices to lowest quartile earnings in Forest Heath is slightly higher than in Suffolk as a whole. Although the ratio has declined from its peak in 2006 of 8.99, it remained in 2013 (the latest year for which figures are available) at 7.15, 80% higher than the figure of 3.96 obtaining in 1997 when this dataset starts.

In our view these figures reinforce the need to make full provision of affordable housing in relation to the evidence of need, and therefore as a means to that end, an appropriate increase in total housing provision in the District.

The Landowner acknowledges the extent of the environmental constraints on development in the District, although has identified unconstrained land at Red Lodge to support high growth, nevertheless the Council presents no evidence of any nominal upper limit to the amount of development which can be accommodated, or more particularly that an additional 10% could not be added to the 7,000 dwellings for the period 2011 to 2031 originally proposed in the Core Strategy.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22972 - Mr Simon Thompson [12662]	Comment	<p>The lower option should be relied upon until such time as the Council understands the implications of RAF Mildenhall or until it is in possession of more up-to-date information to confirm what the housing need for the area is.</p> <p>The Council notes in paragraph 3.20 that the higher option will be difficult to deliver due to the significant environmental constraints in the district. This admission clearly indicates that the higher option cannot be selected and should therefore be disregarded.</p>	<p>The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.</p>	

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23221 - Meddler Properties Ltd [6654]	Comment	<p>What is the starting point to establish the need for housing?</p> <p>Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.</p> <p>The household projections are produced by applying projected household representative rates to the population projections published by the Office for National Statistics. Projected household representative rates are based on trends observed in Census and Labour Force Survey data.</p> <p>The household projections are trend based, ie they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.</p> <p>The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by undersupply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.</p> <p>How often are the projections updated?</p> <p>The Government's official population and household projections are generally updated every two years to take account of the latest demographic trends. The most recent published Household Projections update the 2011-based interim projections to be consistent with the Office for National Statistics population projections. Further analysis of household formation</p>	<p>Noted. An update to the SHMA was published in 2016 setting a revised overall OAN of 6800 dwellings over the 2011 to 2031. Peter Brett Associates undertook research into market signals which helped to inform the SHMA and the setting of a preferred option housing provision target. The SHMA update prepared by Cambridge Research Group used the DCLG and EEFM latest forecasts. The impact of the closure of RAF Mildenhall was taken into account in the OAN assessment. Comments on the technical paper have been noted.</p>	

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	<p>rates as revealed by the 2011 Census will continue during 2015.</p> <p>Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.</p> <p>The 2012-2037 Household Projections were published on 27 February 2015, and are the most up-to-date estimate of future household growth.</p> <p>We request that FHDC re-consult on their proposed housing target once the underlying evidence behind the SIR target has been updated. Notwithstanding this point, the 2013 SHMA indicates that the district has a requirement of 7,000 houses over the plan period (based upon a two year old SHMA and old secondary data) which forms Option 1. The 2013 SHMA indicates high levels of affordable housing need which will not be met and therefore FHDC are also seeking views on a 10% uplift of 7,700 houses (Option 2) in order to further contribute to this need.</p> <p>Neither of the two options would be capable of meeting affordable housing needs over the plan period.</p> <p>The identified affordable need of 2703 homes is higher than can be delivered on 7000 homes through Core Strategy Policy CS9 affordable housing (which requires 30% of all housing to be affordable housing). FHDC state that the two assessments of need (SHMA 'all homes' and affordable need) were not intended to be compared in this way and were calculated using different methodologies, in particular the 2703 figure includes within it existing unmet need of some 1694 homes. This appears to be at variance with national guidance as the PPG states that: "...The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>number of affordable homes."</p> <p>What is the total need for affordable housing?</p> <p>The PPG does not advocate using two objectively assessed housing need figures for both market and affordable units. They should be considered holistically and in the round. FHDC state that meeting the full affordable need of 2703 would require an uplift which may not be achievable in practice when taking account of sites availability, the market/viability considerations and sustainability issues including the district's environmental constraints and settlement constraints. We question this conclusion given that the viability evidence for the district is now some 5 years old and the only market and viability discussion in the 2015 SHLAA is limited to FHDC officer commentary and is not compliant with PPG guidance for viability and plan-making. The NPPF (paragraphs 173, 174, 178) and PPG are absolutely explicit that plans and infrastructure plans should be prepared with economic viability assessments informing policy and requirements. Such evidence should include discussion on market signals. FHDC do not have an up-to-date evidence base to inform their overall housing target, spatial distribution options or site assessments.</p> <p>As a minimum, the SIR should consider an option capable of providing the full objective requirement for affordable units. The joint examination of Cambridge City Local Plan and South Cambridgeshire District Local Plan was suspended in May 2015 after the Planning Inspectors wrote to each respective authority advising them of a number of preliminary concerns including Objectively Assessed Housing Need (OAHN). The Inspectors noted that the Councils should look again at the affordability of housing in the area and consider whether an adjustment to the number of new homes proposed is appropriate (our emphasis):</p> <p>"...we are concerned, in particular, that the Councils approach to the establishment of the full objectively assessed need has not fully taken into account the advice in the Planning Practice Guidance regarding market signals, particularly in relation to affordability. From the discussion at the hearing, it seems to be generally accepted that there is a chronic shortage of affordable housing in Cambridge, even taking into</p>		



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	<p>account the Councils' recent updating of the SHMA following the review of the housing registers. There is no evidence before us that the Councils have carried out the kind of assessment of market signals envisaged in the Guidance; or considered whether an upward adjustment to planned housing numbers would be appropriate.</p> <p>The DCLG 2012-based household projections were published in late February 2015 after the relevant hearing had taken place...we are asking you to consider whether the 2012 based household projections suggest a different level of need and if so, how big is the difference and does it indicate that further modifications should be made to the Plans." - Letter from joint Inspectors to Cambridge City and South Cambridgeshire Councils (dated 20 May 2015) The Councils are in the same housing market as FHDC. Cambridge City and South Cambs have now engaged consultants to update their OAHN. Based upon the Inspectors' concerns we would caution against FHDC relying upon an out of date SHMA. We request that FHDC update their SHMA to respond to the concerns highlighted for neighbouring Cambridge City and South Cambs and the guidance included in the PPG. In addition to updating their OAHN, the two Councils are also updating their viability evidence:</p> <p>"the Councils are seeking to revisit the viability assessments to ensure that the inputs and findings are consistent with other Local Plan evidence and studies. Further, the Councils are conscious that, since the publication of the [previous viability] studies, there have been considerable changes to key inputs; including market conditions and the introduction of new national policy changes that warrant revisiting the findings in any event. In addition, the Councils have also signed the Greater Cambridge City Deal that will unlock up to £500 million of Government funding, helping the delivery of proposed strategic developments."</p> <p>We request that FHDC also update their viability evidence base in this same way to ensure the options and distribution put forward are effective and deliverable.</p> <p>FHDC state that delivery over 7700 would fall short of meeting the full affordable needs in the district</p>		

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	<p>and would result in more market housing than required by the SHMA, as the affordable provision will be delivered through market housing, which could affect housing delivery planned for elsewhere in the sub region. They also note that this level of growth would be hard to deliver, as it is higher than annual average rate over the previous 10 years, only exceeded during housing boom in 2007/08 and 2009/10 and that the level of growth would be difficult to deliver due to the significant environmental constraints in the district. In addition, the Sustainability Appraisal that sits alongside the SIR states that: Uplifting housing provision to meet AH need in full would mean making provision for c.9,700 homes over the plan period (485 dpa). The SA notes that the council is of the view that it is an 'unreasonable' option not worthy of detailed consideration at the current time. Specifically, it is an unreasonable option on the basis that it:</p> <ul style="list-style-type: none"> <li>may not have the desired effect of increasing AH if there is no demand for the market homes needed to deliver them;</li> <li>would involve a level of housing growth unlikely to match with employment provision; would require significant infrastructure improvements; would involve an annual build rate significantly higher than the average rate for the past 10 years; and has the potential to be delivered in accordance with policy CS1, but is likely to compromise other local plan policies and national policy, in particular those which protect sites with nature conservation interest.</li> </ul> <p>The SA discusses Option 2 in the SIR (i.e. a partial uplift of 10%). The SA notes that an uplift was used in nearby Uttlesford Local Plan. The Inspector's report (dated 3rd Dec 2014) states:</p> <p>"I also accept that the objective of improving affordability could be difficult to achieve within the confines of one local authority area and that affordability is affected by many more factors than land supply. However, taking all the above factors in the round, I conclude that it would be reasonable and proportionate, in Uttlesford's circumstances, to make an upward adjustment to the OAN, thereby increasing provision with a view to relieving some of the</p>		

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	<p>pressures. In my view it would be appropriate to examine an overall increase of around 10%.."</p> <p>FHDC considers that, whilst making provision for affordable housing need in full is not a reasonable option, but that making some additional provision for affordable housing needs (via a 10% uplift) is a reasonable and proportionate option. An arbitrary uplift of 10% has not been fully explained in the SIR. Just because Uttlesford have used a 10% uplift it is unlikely that this amount is justified in FHDC given that there will be particular local circumstances and evidence that needs to be considered. We would dispute this logic and respond to each reason put forward by the Council in concluding that an option that delivers higher than 7700 would be 'unreasonable':</p> <p>may not have the desired effect of increasing AH if there is no demand for the market homes needed to deliver them - The number of sites submitted for the SHLAA call for sites</p> <p>shows that there is demand in the market and developers are willing to bring sites forward. An updated viability assessment should be used to provide evidence on demand.</p> <p>would involve a level of housing growth unlikely to match with employment provision - FHDC need to consider how their Local Development Documents can align more closely with</p> <p>the Greater Cambridgeshire and Greater Peterborough (GCGP) LEP and New Anglia LEP Strategic Economic Plans (SEPs) and Growth Deals. The GCGP LEP has been successful in leveraging in funding to help generate 15,500 new jobs and Newmarket features prominently in the LEP SEP. Cambridge City and South Cambs are updating their SHMAs and viability</p> <p>evidence to reflect factors included in the LEP SEP e.g. the latest Growth Deal funding of £500m. The LEP SEPs post date the adoption of the Core Strategy as such the SIR should take account of updated economic evidence as part of an update to the 2013 SHMA. would require significant infrastructure improvements - The fact that some settlements may need significant infrastructure improvements is not a constraint on development if such infrastructure can be delivered over the plan period in a comprehensive strategic way.</p>		

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		<p>would involve an annual build rate significantly higher than the average rate for the past 10 years - this assertion has not been tested with up to date viability evidence and disregards the ability of the public sector and affordable housing providers to bring forward exception sites, PRS schemes and specialist housing.</p> <p>has the potential to be delivered in accordance with policy CS1, but is likely to compromise other local plan policies and national policy, in particular those which</p> <p>protect sites with nature conservation interest - this assertion should be tested through an updated Sustainability Appraisal that includes a greater breadth of reasonable alternatives.</p> <p>Natural England has noted that the presence of stone curlew is not an absolute constraint in all instances. We question the validity of the conclusions included in the August 2015 technical paper to support the overall housing requirement and distribution for the district which disregards an option that would meet full objectively assessed needs for affordable housing. Option 4 in that technical paper should have been subject to Sustainability Appraisal and included in the SIR consultation. (continued in full rep)</p>		
22532 - Jane Tipper [12298]	Comment	<p>Option 1. 7000 homes is preferred.</p> <p>A successful legal challenge to government policy on affordable housing exemption thresholds, means that even small developments will now be required to supply some affordable housing. This will help to increase affordable housing across the district.</p> <p>Option 2 is undesirable as it is unlikely to be achievable without a change in circumstances such as Mildenhall airbase becoming available for housing. This is not certain and could make the document</p> <p>"unsound".</p>	<p>Although the successful legal challenge to government policy on affordable housing exemption thresholds will enable smaller sites to contribute to meeting the affordable need, the full affordable need will not be able to be met unless a large uplift is made to the overall housing provision. This has been considered in the technical report.</p>	

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22981 - Newmarket Racecourses (Ms Amy Starkey ) [6377]	Comment	The presentation of only two options does not address any potential development at RAF Mildenhall and therefore the lower option should be favoured until more information is available and the housing need can be more accurately assessed. Furthermore the council itself points out that the district has significant areas which are constrained by environmental designations and other forms of protection which 'make the higher growth options unachievable'. Based on this the higher option cannot be selected.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
22774 - The Unex Group (Mr Stephen Walsh) [5804]	Comment	The Council should plan for the higher growth of 7700 homes.	noted	
22881 - Mrs Lucy Wadham [12642]	Comment	As already stated, it is not possible for the council to understand the housing requirements for the future when it remains unclear what will be happening at RAF Mildenhall. The absolute pre-requisite is for the council fully to understand the implications of RAF Mildenhall or to obtain more up to date information before it can properly or responsibly assess the housing need for the area in other respects.  The lower option has to be relied upon (a) for the reasons already stated and (b) because the higher option, as the council acknowledges, it would be difficult to deliver due to significant environmental constraints in the district.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	

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23575 - Rural Parish Alliance (Mr Bill Rampling) [12706]	Comment	<p>We believe a lower overall housing target should be sought than either of the 2 options offered because of the very constrained nature of the district.</p> <p>However, to comply with the consultation, we would select option1 as our preferred choice.</p> <p>Option 2 is not a sustainable or deliverable option. The higher housing figure presented in option 2, can only be achieved if "very high growth" at Red Lodge becomes the preferred distribution for housing. As option 2 is a requirement to provide more affordable homes, the sites available for those additional growth levels should be chosen where there is the greatest need for affordable housing, i.e Newmarket. In addition, the site at Red Lodge may not prove deliverable, and would result in the loss of high quality agricultural land.</p>	The SHMA update 2016 has indicated there is a need to provide a lower provision of 6800 dwellings. This figure will be used to inform the housing provision target for the district.	
22266 - The Gredley Charitable Trust [12630]	Comment	The Council should plan for the higher growth of 7700 homes.	noted	
23053 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	LPC supports options for growth that meet affordable housing needs. High housing growth in Lakenheath (Allocation options 1-3) will not meet affordable housing needs because Lakenheath lacks the necessary infrastructure to accommodate low income households needing low cost housing.	noted	
23145 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Comment	<p>The lower option should be relied upon until such time as the council understands the implications of RAF Mildenhall or until it is in possession of more up to date information to confirm what the housing need for the area is.</p> <p>The council notes in paragraph 3.20 that the higher option will be difficult to deliver due to the significant environmental constraints in the district. This admission clearly indicates that the higher option cannot be selected and should therefore be disregarded.</p>	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheat	

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23052 - Jockey Club Estates Ltd [4986]	Comment	The lower growth option is supported as there does not appear to be any up-to-date evidence base to support a 10% increase to assist in delivering affordable housing. It also appears that the Council assumes that affordable housing will only be delivered as part of an open market scheme. There are examples of 100% affordable housing allocations including N/20 and N/33.	noted. The technical paper which supported the further issues and options SIR evidenced the likely provision of affordable housing including 100% affordable schemes.	
23538 - Moulton Parish Council (Mrs L Stone) [5222]	Comment	We favour option 1 for 7000 homes but would insist that developers produce at least 30% affordable units. If this proves difficult the Local Authorities should be proactive and purchase land in sustainable locations for the provision of affordable housing. Market forces will dictate if extra private provision is needed. We feel that the reduction of USAF personnel at Mildenhall over the next few will have a major impact on the supply of housing available in the district.	Noted. The Council will apply policy CS9 of the Core Strategy to achieve affordable provision.	
23256 - Talavera Estates Ltd [1204]	Comment	Forest Heath should plan for Option 2 which proposes 7,700 dwellings in the period 2011-2031 or 385 homes each year, in order to address more of the affordable need. The NPPF makes clear that authorities should boost significantly the supply of housing (NPPF, paragraph 47) and therefore providing more market housing than required under the Strategic Housing Market Assessment (SHMA) should not be a barrier to growth. Managing growth and environmental constraints are a fundamental part of the Plan and should be addressed, as growth will inevitably continue after the Plan period so will need to be resolved eventually.	The SHMA update 2016 has indicated there is a need to provide a lower provision of 6800 dwellings. This figure will be used to inform the housing provision target for the district.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23208 - Breckland District Council (Mr Iain Withington) [11700]	Comment	<p>Breckland District Council has focused the following observations around the principal matters that are of cross boundary importance. Consequently our focus has been with your Council's approach to overall housing provision and your four distribution options (as they may affect Breckland). A particular focus has been how these might impact on the market town of Brandon and its relationship with the Brecks, Weeting Parish and any cross boundary issues your consultation proposals might raise.</p> <p>Firstly Breckland District Council can now advise that it intends to meet in full its own objectively assessed need at district level though the production of the single Local Plan, which is timetabled to be adopted towards the end of 2016. As you will be aware, the Council endorsed the draft version of the emerging Joint Central Norfolk SHMA on the 22 September 2015 in so far as it relates to Breckland and as part of its preparation, representatives from Suffolk have been engaged.</p> <p>Notwithstanding this the Council would like to understand how Forest Heath District Council proposes to deal with the continuing uncertainty around the future of RAF Mildenhall in terms of its Single Issue Review and housing provision. Breckland District Council would advocate a more explicit approach showing what might happen in terms of two options: one that factors in the present understanding of the timeline and consequences of the USAF withdrawal and divestment and another factoring in the MOD should it wish to retain a defence need for the site.</p> <p>Breckland Council notes from recent duty to co-operate meetings between the three authorities earlier this year and meetings relating specifically to proposals to promote the regeneration of Brandon through a major housing development incorporating a 'relief road'; that the Forest Heath District Council's stance on this matter has evolved. Breckland District Council welcomes Forest Heath District Council's acknowledgment within its Single Issue Review the significant environments constraints around Brandon, especially given its proximity to the Brecks and the nearby village of Weeting within Breckland Council's administrative area.</p>	<p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible for this to inform the overall housing provision in the Core Strategy Single Issue Review.</p>	



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22905 - Hills Residential Ltd [12651]	Comment	Given the increasing cost of market housing, affordable homes are needed to allow people to access the housing ladder. FHDC state that Option 1 is unlikely to deliver the required level of affordable houses. Option 2 must be implemented if FHDC are to deliver essential affordable housing. Option 2 should be expanded as there are additional sites which could help to deliver the additional houses still needed, for example, site RL/07 has been discounted but representations made during this consultation period demonstrate it is suitable for mixed residential and commercial use and could help to meet some of these targets.	The Council acknowledges the importance of addressing the affordable housing needs of the district.	
23226 - Jaynic Investments LLP [12521]	Comment	Option 2 - providing 7,700 dwellings in the period 2011-2031 or 385 homes each year, should be Forest Heath District Councils preferred option for growth.	noted	
22931 - Mr Richard Ward [12658]	Object	None - the availability of RAF Mildenhall and the vast difference this would make to the District should be carefully considered, it has not and distorts the requirements of housing and therefore at this point the only option would have to be the lower option. Significant and realistic environmental constraints already acknowledge excludes the higher option  <i>Consideration of RAF Mildenhall as an option to be specifically included</i>	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
22555 - Mr Michael Hall [12524]	Support	I think that on the affordable housing issue option 2 is the one to go for. I think that is a very important issue. The only downside I can see is that this maybe a bit premature given that we don't know what is happening with RAF Mildenhall until a later date.	The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. The future use of the base is a separate matter which can be considered once the future intention, deliverability and availability of the base is known.	
22931 - Mrs Anita de Lotbiniere [6677]	Support	I support option 1. This is because Forest Heath is constrained in many ways by its sensitive landscape and the many SACs and SPAs which reflect the rare species which are found here - stone curlew, nightjar and woodlark in particular. The siting of housing in the district is therefore particularly difficult.	Comment noted about the importance of protecting the sensitive landscape, SAC and SPAs of the district.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23192 - Animal Health Trust [4678]	Support	<p>AHT strongly supports Option 2, involving the total provision of 7,700 dwellings in the Plan period 2011 to 2031. It considers it to be the more appropriate option</p> <p>In relation to the pros and cons identified under Option 1, AHT considers the first two advantages, relating to compliance with the SHMA, to be not significant.</p> <p>In relation to the pros and cons identified for Option 2, AHT considers that a further advantage of this growth option would include a greater level of socio-economic benefits. The disadvantage stated in bullet point 4 is contrary to paragraph 5.4 of the consultation document which clearly states that there are a sufficient number of relatively unconstrained sites across the district to deliver the two options for growth.</p>	comments noted	
23184 - Crest Nicholson (Eastern) [11393]	Support	<p>Crest Nicholson strongly supports Option 2, involving the total provision of 7,700 dwellings in the Plan period 2011 to 2031.</p> <p>In relation to the pros and cons identified under Option 1, Crest Nicholson considers the first two advantages, relating to compliance with the SHMA, to be not significant.</p> <p>In relation to the pros and cons identified for Option 2, Crest Nicholson considers that a further advantage of this growth option would include a greater level of socio-economic benefits. The disadvantage stated in bullet point 4 is contrary to paragraph 5.4 of the consultation document which clearly states that there are a sufficient number of relatively unconstrained sites across the district to deliver the two options for growth.</p>	comments noted	
23086 - CgMs (Mr Matthew Eyre) [12619]	Support	<p>Option 2 for 7700 new dwellings over the plan period, as this will this option would meet more of the affordable housing needs than Option 1 and plan to accommodate the growing housing needs in the area.</p>	noted	

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22742 - West Row Action Group (Mr John Smith) [12494]	Support	Support Option 2 . As a rural community the provision of affordable homes should be at the heart of the strategy .	Noted the comment on the importance of affordable housing to the rural community.	

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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**4. Environmental constraints to housing growth**

4.1-4.5

23130 - Persimmon Homes Ltd  
(Ms Laura Townes) [12549]      Comment      4.5 See Response to Question 2

The 'issues and options ' version of the Single Issue Review (SIR) is informed by the requirements of the NPPF, existing planning policies, available evidence and any other primary legislation. The evidence available to the Council to inform the issues and options SIR did not indicate that a medium or high growth option for Brandon is deliverable and therefore a reasonable option.

None

No further evidence has been presented through the consultation responses to demonstrated that a higher level of growth at Brandon could be delivered with the necessary mitigation to ensure no adverse impact on protected species.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23124 - Environment Agency (Elizabeth Mugova) [12393]	Comment	<p><b>Flood Risk</b> We are currently reviewing the outputs from the Eastern Rivers Project (ERP) which will provide updated and new detailed model data for the Forest Heath District. The data will show the impact of climate change of river flow/levels. This data will be available in late 2015.</p> <p>The climate change allowance guidance for development within the Anglian region has proposed an increase from 20% to 35% on river flows/levels. Therefore, measures should be taken with any development to ensure resilience and reduction of the effects of climate change through effective adaptation and mitigation when dealing with flood risk. For example, the Council can choose the greatest level of allowance (65%) and make sure all development is built to incorporate that standard or manage the changes over time so that climate change measure can be built into the development in the future.</p> <p>We are aware that a stage 2 SFRA was completed in 2012; please note that this will require a light touch update to consider climate change allowance and Eastern Rivers outputs in the future.</p> <p>The Lead Local Flood Authority should be consulted on all issues relating to surface water flooding in the district before development begins.</p> <p><b>Water</b> The constraints identified in the Plan relating to wastewater treatment, water pollution and water supply look reasonable. However, the Sustainability Appraisal has very little information to properly assess the 'Current baseline' for Objective EN3 (Pollution of Water). For instance, Water Framework Directive (WFD) classifications could have been listed for the watercourses identified in the plan in order to provide a definitive 'water pollution baseline'. Future classification data could then be used to confirm that delivery of the proposed growth has not led to deterioration on river quality.</p> <p>WFD through the River Basin Management Plans (RBMPs) sets out the environmental objectives which will need to be met for surface and ground water bodies in order to comply with the requirements of the Directive. The Anglian RBMP will be an important focus for water quality improvements for the plan and for developers.</p>	<p>The need for a light touch update to the stage 2 SFRA is noted and is being actioned.</p> <p>The comments in relation to the baseline information in the SA for Objective EN3 are noted and will be reviewed in advance of the next consultation.</p> <p>We will continue to work with the Environment Agency as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>The aims and objectives of WFD are to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> achieve the overall 'good' status of waters</li> <li><input type="checkbox"/> prevent deterioration and enhance the quality of the Water Environment</li> <li><input type="checkbox"/> promote the sustainable use of water</li> <li><input type="checkbox"/> reduce contamination</li> <li><input type="checkbox"/> mitigate against the impacts of floods and droughts</li> <li><input type="checkbox"/> create better habitats for people and wildlife</li> </ul> <p>The Environment Agency has a duty regarding its obligations under WFD to prevent deterioration in ecological status. This may require us to modify time limited abstraction licences by 2018.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23207 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Comment	<p>It is not within Natural England's remit to suggest which option put forward for housing distribution would be more appropriate. However we would request full consideration of the natural environment in the process of reviewing the overall housing distribution and site allocations through the Local Plan process. In our view it is important to ensure that areas of medium or high growth have an appropriate level of infrastructure in place, are connected to the water supply and foul drainage networks in advance of works and have access to green infrastructure and recreational facilities. As previously discussed with your authority (and explained further with regards to the HRA screening) we recommend that sufficient green infrastructure is included in all settlements to ensure that recreational activities are diverted away from Breckland SPA and any potentially sensitive SSSIs.</p> <p>We consider that environmental constraints have been correctly identified in the document. As you are aware, Brandon, Mildenhall, Lakenheath, Red Lodge and Kentford include areas of land within Breckland SPA and/or Stone Curlew Nest constraint zones. Natural England advises that development within such areas may not be deliverable unless it can be satisfactorily demonstrated that suitable mitigation can be provided. In relation to Brandon, we recognise the further sensitivity of this area owing to its position and therefore consider that a precautionous approach to considering housing distribution and provision at this location is appropriate.</p> <p>Environmental constraints are less evident in Newmarket, Beck Row, Exning and West Row. We note that the report identifies Newmarket to be the Districts' largest and most sustainable market town (although constrained by significant areas of land within Flood Zones and horse-racing related land uses).</p> <p>In relation to settlements within the stone curlew nest attempts buffer, note that there may be changes to the buffer that may affect decisions regarding site allocations. The buffer will need to be reviewed as even the most recent data is taken from 2006, so is evidently becoming out of date. Your authority therefore needs to ensure that the data used to</p>	<p>The need to update the stone curlew nesting attempts buffer is noted and will be actioned to help inform decision making on future site allocations.</p> <p>The comments in relation to Lakenheath are noted and appropriate text will be included at the next stage of consultation.</p> <p>We will continue to work with Natural England as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.</p>	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22944 - Mrs Anita de Lotbiniere [6877]	Support	<p>formulate the buffer is updated and an analysis is undertaken to decide whether the buffer needs amending. This needs to be undertaken early in the process as it may affect decisions on housing distribution. We recommend that your authority discusses this approach with Breckland Council to formulate a joint approach. We will be happy to discuss this further.</p> <p>We note that several of the options include a high level of housing in Lakenheath, therefore please note that development to the east of Lakenheath is constrained by the presence of Maidscross Hill SSSI, and RAF Lakenheath SSSI, the latter a component SSSI of Breckland SAC. Policy CS7 should acknowledge the requirement for any development to be able to satisfactorily demonstrate no adverse effect on these SSSIs (and the potential for significant effects on Breckland SAC); Habitats Regulations screening of development sites in Lakenheath, at an early stage, will help minimise risks to their deliverability at the detailed stage.</p>	Noted	None

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Brandon</i>				
23797 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>ARCHAEOLOGY</p> <p>Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.</p> <p>Brandon - There are multi-period archaeological remains all along the Little Ouse valley. Brandon is a historic settlement. Scheduled monuments include the Anglo-Saxon monastic site at Staunch Meadow and a prehistoric barrow.</p>	Noted.	The council will continue to work with Suffolk County Council in the preparation of the Single Issue Review document.
22608 - Mrs Rosamund Lodge [12584]	Comment	I feel there is insufficient infrastructure within the individual towns in the district even before any further housing development, especially in Brandon. The provision of affordable housing falls way short of affordability for the local population. Even if they are affordable compared with the 'new' houses being built alongside them. Also they tend to be of the wrong sort of properties as there is an increase need for 1 and 2 bedroom affordable housing. Developers will not build the smaller properties that are needed by the current population and so feel that local councils need to take on this sector of the housing market.	The infrastructure requirements for each settlement are set out within the IDP which accompanies the SIR. Developers are required to adhere to the council's affordable housing policies when submitting plans for new development.	None
23131 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	4.6 See Response to Questions 1 and 2. Further evidence is being prepared as part of a viability assessment to demonstrate how Site B/14 can be delivered and address constraints in Brandon.	<p>The 'issues and options' version of the Single Issue Review (SIR) is informed by the requirements of the NPPF, existing planning policies, available evidence and any other primary legislation. The evidence available to the Council to inform the issues and options SIR did not indicate that a medium or high growth option for Brandon is deliverable and therefore a reasonable option.</p> <p>No further evidence has been presented through the consultation responses to demonstrated that a higher level of growth at Brandon could be delivered with the necessary mitigation to ensure no adverse impact on protected species.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23132 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	4.7 See Response to Question 2	<p>The 'issues and options ' version of the Single Issue Review (SIR) is informed by the requirements of the NPPF, existing planning policies, available evidence and any other primary legislation. The evidence available to the Council to inform the issues and options SIR did not indicate that a medium or high growth option for Brandon is deliverable and therefore a reasonable option.</p> <p>No further evidence has been presented through the 2015 consultation to demonstrate that a higher level of growth at Brandon could be delivered with the necessary mitigation to ensure no adverse impact on protected species.</p>	None.
23231 - Anglian Water (Ms Sue Bull) [11226]	Comment	There is currently spare capacity at the receiving Brandon Water Recycling Centre to accommodate growth at the scale suggested for Brandon( 50-55 dwellings).	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.
23076 - Suffolk Preservation Society (Mrs Bethany Philbedge) [12105]	Comment	The list of constraints should include the Brandon Conservation Area and nationally designated listed buildings.	Noted. Heritage constraints will be included for each settlement in the next consultation document.	Refer to heritage assets within settlements in the revised SIR document.
22692 - Mr Hugh Lodge [11964]	Comment	<p>As a general comment:- I feel there is insufficient infrastructure within the individual towns in the district even before any further housing development, especially in Brandon which is where I live and Red Lodge. Also the provision of affordable housing falls way short of affordability for the local population, even if they are affordable compared with the 'new' houses being built alongside them. Also they tend to be of the wrong sort of properties as there is an increase need for 1 and 2 bedroom affordable housing. Developers will not build the smaller properties that are needed by the current population and so feel that local councils need to take on this sector of the housing market.</p> <p>As for the choice of which of the 4 options is best for the future development of West Suffolk I feel unable to comment as for me to judge the various areas I would need to do a lot more research.</p>	Noted. The infrastructure requirements for each settlement are set out within the Infrastructure Delivery Plan which accompanies the SIR. Developers are required to adhere to the council's affordable housing policies when submitting plans for new development.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23204 - Five Villages Preservation Trust (Dr Allan Marchington) [5854]	Comment	* The suggested level of growth at Brandon is not a sustainable option for regeneration of the town. Brandon has extensive employment opportunities and available brown field sites which are not being considered for growth.	The opportunities for growth in each settlement are considered on the basis of environmental and infrastructure constraints. At present, there is insufficient information to suggest that the extensive environmental and policy constraints can be overcome to allow further growth in Brandon.	None.
23083 - Suffolk Preservation Society (Mrs Bethany Philbedge) [12105]	Comment	There is high archaeological potential in the locality which should be reflected in the list of constraints	Noted. Archaeological potential is assessed on a site by site basis and is considered in the Site Allocations document.	None.
22957 - Mrs Anita de Lotbiniere [6677]	Support	I support that Brandon development is kept to a minimum to safeguard the protection zones for rare bird species. That traffic congestion has been reduced by the A11 dualling. That traffic congestion could be further improved by the building of a bridge over the railway to replace the level crossing.	Noted	None
<i>Mildenhall</i>				
23233 - Anglian Water (Ms Sue Bull) [11226]	Comment	There is currently capacity at the receiving Mildenhall Water Recycling Centre to accommodate all levels of growth indicated in the options for Mildenhall ( ranging from 1145-1770 dwellings).	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.
23798 - Suffolk County Council (Mr James Cutting) [11903]	Comment	ARCHAEOLOGY  Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.  Mildenhall - There are multi-period archaeological remains all along the Lark Valley, particularly around Mildenhall where the river meets the fens. Mildenhall is a historic settlement with likely prehistoric origins. To the east, there are extensive multi-period remains relating to exploitation of the heath land, including warrens.	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23080 - Suffolk Preservation Society (Mrs Bethany Philbedge) [12105]	Comment	Mildenhall also has a conservation area and nationally designated listed buildings which for consistency should be included here as they are considerations for selecting location of sites for new housing development	Noted. Heritage constraints will be included in the next consultation document.	Refer to heritage assets within settlements in the revised SIR document.
<i>Newmarket</i>				
23799 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>ARCHAEOLOGY</p> <p>Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.</p> <p>Newmarket - In the environs of Newmarket, there are multi-period archaeological remains, particularly along the river valley sides.</p>	Comments are noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
23082 - Suffolk Preservation Society (Mrs Bethany Philbedge) [12105]	Comment	Newmarket also has a conservation area and nationally designated listed buildings which for consistency should be included here as they are considerations for selecting location of sites for new housing development	Noted. Heritage constraints will be included in the next consultation document.	Refer to heritage assets within settlements in the revised SIR document.
23205 - Five Villages Preservation Trust (Dr Allan Marchington) [5854]	Comment	<p>* The development options offered at Newmarket are too restricted, forcing unsustainable levels of development into the rural villages where infrastructure is limited and often employment to support additional housing is unavailable, leading to the creation of commuter villages.</p> <p>* Mitigation measures are available in Newmarket to enable development, but the suggested level of growth proposed in this location does not reflect that possibility.</p> <p>* We believe that suggesting Brandon and Newmarket are too constrained to accept higher levels of growth is not a sustainable option when looking to accommodate 7,000 or 7,700 homes. We believe in that situation, a lower housing target should be sought.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23234 - Anglian Water (Ms Sue Bull) [11226]	Comment	<p>There is currently capacity at the receiving Newmarket Water Recycling Centre to accommodate all levels of growth indicated in Newmarket ( ranging from 300-1630 dwellings).</p> <p>Note: Newmarket WRC serves Newmarket, Exning and Kentford. If growth in all three areas were all on the highest scale indicated and all came forward then there would still be sufficient capacity.</p>	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.
23155 - Newmarket Horsemen's Group (NHG) [11392]	Object	<p>4.9</p> <p>The Council has neglected to identify existing traffic congestion in Newmarket as a constraint to development. This is discussed further below. □ The Council has identified the Horse Racing Industry as a constraint to expansion. Although the NHG agrees that the existence of the horse-racing industry restricts the level of residential development within Newmarket, it is considered that the current wording does not acknowledge the importance of the industry to the local economy. The NHG requests that further policy documents openly acknowledges the economic significance of the industry and the desire to protect this - as recommended by the recently published Deloitte report.</p>	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23179 - Tattersalls Ltd (Mr John Morrey) [5726]	Object	The council has neglected to identify the existing traffic congestion as a constraint to development in Newmarket The horse racing industry is identified as a constraint but this is not qualified with the importance of the industry to the local economy as confirmed in the Deloitte report.	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.
23235 - Anglian Water (Ms Sue Bull) [11226]	Comment	There is currently spare capacity at the receiving Lakenheath Water Recycling Centre to accommodate the scale of growth in Lakenheath indicated in the options (ranging from 410-975 dwellings).	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.
23800 - Suffolk County Council (Mr James Cutting) [11903]	Comment	ARCHAEOLOGY  Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.  Lakenheath - Lakenheath is surrounded by multi-period archaeological sites, particularly relating to activity on the fen edge. Maidscross Hill is an important lower Palaeolithic site.	Comments noted	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23055 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	LPC agrees that the detailed list of constraints in para 4.10 evidences a range of reasons why large housing growth in the village is inappropriate. See below as to detail of further constraints not recorded. In particular, the noise constraints information is out of date and does not reflect the decision to relocate two F-35 squadrons (which have different noise profiles from the present squadrons of F-15s) to RAF Lakenheath. LPC's information is that a contingent of USAF personnel will arrive in November 2015 to assess the infrastructure requirements for the F35's expected arrival at Lakenheath airbase.  <i>Noise rating needs to be considered when available.</i>	Noted. The constraints mapping is based on the most up to date information available to the council. Should more up to date information become available, this will be used in the preparation of the Local Plan.	None.
<i>Red Lodge</i>				
23236 - Anglian Water (Ms Sue Bull) [11226]	Comment	There is currently spare capacity at the receiving Tuddenham Water Recycling Centre to accommodate growth. The largest scale of growth category in option 3 (1970-2170) may require upgrades. Any required upgrades will be funded by Anglian Water however they will need to be planned and funded through our 5 year business plan, approved by our economic regulator Ofwat. We can look at this in more detail when potential sites have been identified to assess the impact of potential growth.	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.
23801 - Suffolk County Council (Mr James Cutting) [11903]	Comment	ARCHAEOLOGY  Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.  Red Lodge - There are multi-period archaeological remains in the environs of Red Lodge, particularly relating to activity along the River Kennett and exploitation of chalk and heath. There are scheduled prehistoric barrows.	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Beck Row</i>				
23802 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>ARCHAEOLOGY</p> <p>Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.</p> <p>Beck Row - There are multi-period archaeological remains in the environs of Beck Row, particularly relating to activity on the fen edge.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
23238 - Anglian Water (Ms Sue Bull) [11226]	Comment	There is currently capacity at the receiving Mildenhall Water Recycling Centre to accommodate all levels of growth indicated for Beck Row( between 110-350).	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.
23199 - Mr & Mrs B Rolfe [12682]	Comment	We consider that Beck Row is a suitable location for significant growth over and above that required to meet local needs. The settlement is relatively unconstrained with opportunities to create a significant focus for future housing and employment. This can be achieved without coalescence with Holywell Row and outside the main aircraft noise constraints. We express concern as to the apparent piecemeal approach to development at Beck Row and consider that a Village Plan or Inset Proposals Map is required in order to guide future development.	<p>The comments are noted. The opportunities for growth in each settlement are considered on the basis of environmental and infrastructure constraints and available sites and infrastructure requirements.</p> <p>A Policies Map of showing proposed allocations in Beck Row will accompany the Site Allocations Local Plan consultation document.</p>	None.
<i>Exning</i>				
23232 - Anglian Water (Ms Sue Bull) [11226]	Comment	There is currently capacity at the receiving Newmarket Recycling Centre to accommodate the level of growth indicated in the options ( 135-150dwellings).	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23803 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>ARCHAEOLOGY</p> <p>Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.</p> <p>Exning - There are multi-period archaeological remains in the environs of Exning, relating to river valley sides, notably Iron Age, Roman and Anglo-Saxon sites.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
<i>Kentford</i>				
22591 - Kentford Parish Council (Mr Malcolm Baker) [12577]	Comment	<p>There are other constraints in addition to those mentioned.</p> <p>1. limitations of present poor infrastructure - specifically in roads and services within the village.</p> <p>2. The village has already experienced considerable recent growth, and there are already approved plans for further development.</p>	<p>The comments are noted. The opportunities for growth in each settlement are considered on the basis of environmental and infrastructure constraints and available sites and infrastructure requirements and growth that has taken place since the start of the plan period.</p> <p>Detail on preferred sites in Kentford will be included in the Site Allocations Local Plan.</p>	None
23133 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	4.14 See Site Allocations Representation in relation to how site constraints have been addressed for Site K/14 (Land East of Gazeley Road).	Noted. Detail on preferred sites in Kentford will be included in the Site Allocations Local Plan.	None.
23233 - Anglian Water (Ms Sue Bull) [11226]	Comment	There is currently capacity at the receiving Newmarket Recycling Centre to accommodate the level of growth indicated in Kentford ( 130-140 dwellings)	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23804 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>ARCHAEOLOGY</p> <p>Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.</p> <p>Kentford - There are multi-period archaeological remain in the environs of Kentford, relating to valley sides particularly over Slade Bottom. A prehistoric barrow cemetery lies to the west of the village.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
<hr/>				
<i>West Row</i>				
23805 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>ARCHAEOLOGY</p> <p>Finally, the following helps identify context for archaeological remains across the District, and could be referred to in the site allocations document to highlight the need for archaeological assessment. This is equally relevant to the Single Issue Review document.</p> <p>West Row - There are multi-period archaeological remains in the environs of West Row, where the River Lark meets the fen edge.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
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23239 - Anglian Water (Ms Sue Bull) [11226]	Comment	<p>There is currently capacity at the receiving Mildenhall Water Recycling Centre to accommodate all levels of growth indicated in the options for West Row ( 65-320 dwellings)</p> <p>Note: Mildenhall WRC serves West Row, Beck Row and Mildenhall. If growth in all three areas were all on the highest scale indicated in the options and all came forward, currently there is sufficient capacity to accommodate the foul flows.</p>	Noted. We will continue to work with Anglian Water as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.

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*Representations*

*Nature Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*Question 2*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23134 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	<p>Persimmon Homes consider that insufficient evidence has been gathered by the LPA to discount development in the SPA Constraint Zones at this early stage. Core Strategy Policy CS 2 states that proposals for development in the Constraint Zones (CZ) will require a project level HRA and that development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed. Therefore, it does not suggest the LPA should resist all development in the Constraint Zones if it can be demonstrated there is no adverse effect.</p> <p>Policy CS1 defines Brandon as a Town; it is in the top tier of the settlement hierarchy along with Newmarket and Mildenhall. The most sustainable distribution of development as a first option is to direct development to the Towns, where there is a good availability of employment and services. The housing distribution options propose medium growth at Mildenhall and high levels of growth at Newmarket without relying on sites in the SPA CZ; Brandon is the only Town identified for low growth of 50-55 dwellings as there are no sites outside of the CZ. This distribution option is not a sustainable form of development; it will limit opportunities for regeneration of the town and encourage over-reliance on commuting to access the employment and services in Brandon.</p> <p>Para 4.7 of the SIR states: "Because of the environmental constraints in Brandon, it is not considered reasonable at this time to consult on a medium or high level of growth in the settlement." The SIR Technical Paper para 5.10 states: "If, through this consultation and the Site Allocations Local Plan, it can be demonstrated that sites in Brandon could be developed without adverse effects, the 'low growth' option will be revisited in light of the information received."</p> <p>This suggests that the onus is on landowners and developers to demonstrate to FHDC that sites in the CZ can be developed without adverse impact on the SPA. However, Policy CS1, which defines the settlement hierarchy, is FHDC's own policy and FHDC is the "competent authority" for undertaking the HRA. Therefore, FHDC should carry out HRA of CZ sites in</p>	<p>The 'issues and options ' version of the Single Issue Review (SIR) is informed by the requirements of the NPPF, existing planning policies, available evidence and any other primary legislation. The evidence available to the Council to inform the issues and options SIR did not indicate that a medium or high growth option for Brandon is deliverable and therefore a reasonable option.</p> <p>No further evidence has been presented through the 2015 consultation to demonstrate that a higher level of growth at Brandon could be delivered with the necessary mitigation to ensure no adverse impact on protected species.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Brandon to identify whether it could accommodate more development in line with its designation as a Town. This is the recommendation of the SIR HRA Screening (Table 6.2): "Carry out Appropriate Assessment in partnership with Natural England and the RSPB to determine the effects of individual site options in the Site Allocations Local Plan and hence the deliverability of housing distributions to this settlement without adverse effects on integrity of Breckland SPA."</p>	<p>In addition, the SIR HRA Screening recommends that further work is carried out as part of an Appropriate Assessment to agree with Natural England a zone within which recreational effects on Breckland SPA from residential development will be assumed to exist where contributions to mitigation will be required (secured under Policy DM12) unless the applicant can demonstrate otherwise through project level HRA; and key features of a mitigation and monitoring strategy, which the developer contributions will help to fund. If this advice is followed, the mitigation can be accounted for in the HRA Screening conclusions.</p>	
		<p>The stages of HRA are as follows:</p>		
		<p>Stage 1: Screening. Where effects are judged likely, or lack of information to prove otherwise, proceed to Stage 2.</p>		
		<p>Stage 2: Appropriate Assessment. This involves information gathering, impact prediction and evaluation of impacts. Where impacts are considered to affect qualifying features, identify and assess alternative options. Adverse effects should be avoided through avoidance first, and secondly mitigation.</p>		
		<p>It appears FHDC has not undertaken "information gathering, impact prediction and evaluation of impacts" on the CZ sites and has instead moved straight onto the stage of assessing alternative options (sites outside of the CZ).</p>		
		<p>The SIR HRA para 1.16 states that is it normally anticipated that an emphasis on Stages 1 and 2 of</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>this process will, through a series of iterations, help ensure that potential adverse effects are identified through the inclusion of mitigation measures designed to avoid, reduce or abate effects. FHDC has relied on avoiding potential effects by not including any sites in the CZ but, if Stage 2 is carried out in full, it may be possible to demonstrate that sites within the CZ can be developed without adverse effects on the SPA by identifying appropriate measures to avoid effects on the SPA, such as through access management and green infrastructure provision.</p>		
		<p>Therefore, FHDC should actively be gathering information (such as visitor surveys) and facilitating discussions between site promoters and Natural England to identify which sites in the CZ can be developed without adverse impact on the SPA.</p>		
		<p>Persimmon Homes' site at Green Road (B/14) is one of the least constrained sites in Brandon. It is a medium size site, being able to deliver up to 500 dwellings (a site viability assessment is being prepared to refine the likely capacity of the site) and is not reliant on large scale infrastructure to deliver housing in the short term. A HRA Screening Report was submitted to FHDC in May 2015 to support representations to the Strategy Housing Land Availability Assessment Review 2015. The Screening Report provided some initial conclusions that direct impacts from the proposed development on SPA species and habitats are not reasonably likely and identified land available for mitigation directly to the east of B/14 (see attached site plan with mitigation land shown in blue).</p>		
		<p>Further data gathering has since taken place and an application for Natural England's Discretionary Advice Service was submitted on 6 August to seek advice on refining the scope of the HRA. The information submitted in support of this request has since been updated and elaborated and is attached in support of this representation (see attached Wildlife Frontier Statement, October 2015).</p>		
		<p>Unfortunately, Natural England declined to meet on the basis that the site is located within the CZ. Given</p>		

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		that the purpose of this consultation is to gather evidence and options, this highlights the need for FHDC to facilitate discussions between site promoters and Natural England to enable FHDC to identify whether the constraints at Brandon can be overcome, thereby identifying reasonable alternative options for the distribution of housing that is in accordance with both Policy CS1 and Policy CS12.		

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23595 - Herringswell Parish Council (Su Field) [5165]	Comment	<p>A consistent approach to the inclusion or exclusion of sites based upon environmental constraints at Brandon has not been taken.</p> <p>The site allocations document suggests that site B/01 could be included as a potential development opportunity for a total of 43 dwellings (although already has approval for 63 homes) at Brandon, but similar sites with the same environmental constraints have been rejected. For example B/02 (12 dwellings), which is a brownfield site, B/05 (12 dwellings) that is also a brownfield site, B/06 (37 dwellings), B12 (142 dwellings) that the town council have already received permission to build a cemetery on and are supportive of the additional housing. B/17 (1791 dwellings) also has the same nature designation as B/01. If it was considered inappropriate to bring the whole site forward, part of the site might be available, with the rest of the site offering mitigation? We are surprised these options have been so readily rejected when Brandon town council have been seeking additional development. Brandon is a more sustainable location with employment, train services, schools, shops, Drs, dentists etc.</p> <p>We are surprised that the constraints identified for Brandon have limited development to such an unsustainable amount of growth (55 dwellings). The previous core strategy identified 240 potential brownfield sites where development could be located and you can see above that even if site B/01 was allocated at a density of 43 houses rather than the approved 63 and if site B/17 was omitted from the calculation, Brandon could support 246 houses on land classified the same as B/01.</p> <p>We believe that Newmarket faces some constraints based around the horse racing industry, however, we believe many of the concerns over traffic issues, can be mitigated against if a willing and compliant developer is sought.</p>	<p>The opportunities for growth in each settlement are considered on the basis of environmental and infrastructure constraints. At present, there is insufficient information to suggest that the extensive environmental and policy constraints can be overcome to allow further growth in Brandon.</p> <p>Further detail on sites is set out in the Site Allocations Preferred Options document.</p>	None.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22945 - Bennett Homes [6665]	Comment	<p>The constraints identified are accurate, however many of the geographical extents of the constraints overlap and so the existing situation for land in Lakenheath is not as difficult as the list in paragraph 4.10 suggests. Stone Curlews are identified as a constraint for development at Lakenheath, however this fails to recognise that despite this there is plenty of scope for development to the north of the town and as infill developments within the existing settlement. Additionally, the Stone Curlew Nesting Constraint Zone falls outside of Lakenheath. Further ecological reports, commissioned for the land at L/28 states that although Stone Curlews were identified within 2km of the site, there was no evidence of them on site. Therefore identifying Stone Curlews as a constraint is misleading as there is sufficient capacity outside the buffer zone to accommodate the highest level of growth identified.</p> <p>Noise from RAF Lakenheath is rightly identified as a constraint in the south of the settlement; however land to the north and east of the town can still be developed. Development sites to the north and north east represent the best options for Lakenheath. Furthermore, the recent decision to close RAF Mildenhall and relocation of many personnel suggests that the airfield is not simply a constraint; rather it will provide an increase demand for housing in the town. The description in 4.10 is too simplistic as it fails to recognise the significant sites on the edge of the settlement boundary to the north that could be developed. Further, only a small amount of the land on the Lakenheath side of the river, the Eriswell Lode, is within an Environment Agency flood risk zone. A special area of conservation and a site of special scientific interest (SSSI) are both identified as existing constraints to the south east of the town. However, these areas fall within both the area of high noise surrounding RAF Lakenheath. Therefore, rather than representing further constraints on Lakenheath as a whole, these constraints compound the view that the area south of the town, surrounding the RAF field, is inappropriate for housing development.</p>	<p>The constraint layers are used to help identify issues which may prevent land being suitable for development/identify mitigation which may be required where development is proposed.</p> <p>The stone curlew buffers (Policy CS2 of the Core Strategy) are in place across West Suffolk to ensure no harm to this protected species. The onus is on the promoter/developer of sites within the buffer to demonstrate that any issues can be overcome, in consultation with Natural England.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23180 - Tattersalls Ltd (Mr John Morrey) [5726]	Comment	No - the constraints for Newmarket are not accurately recorded. eg the existing traffic situation. This issue was highlighted by the 2009 IECA report and also the evidence at the recent Hatchfield Farm inquiry. The Deloitte report also recommends further research into this issue.	The document refers to the need to carefully manage the movements of vehicles and horses within the town, an issue which will be re-emphasised in the next consultation draft.  Highways issues will be taken into consideration in the determination of an appropriate distribution strategy and are considered further in the draft Infrastructure Development Plan.	None.
23169 - R J Upton 1987 Settlement Trust [12681]	Comment	The Landowner considers that the material in this section of the SIR provides a comprehensive and balanced account of the constraints in the District and those affecting particular settlements.	Noted	None.
23227 - Jaynic Investments LLP [12581]	Comment	The constraints listed for Red Lodge at paragraph 4.11 are, to the best of our knowledge, an accurate reflection of the key constraints for Red Lodge, albeit in the context that each individual site that will come forward for development in Red Lodge could have additional, site specific, constraints. It is also noted that constraints listed for Red Lodge at paragraph 4.11 are consistent with the 'Red Lodge Key Planning Constraints' plan at page 140 of the 'Site Allocations Local Plan - Further Issues and Options'.	Noted.	None.
23448 - Barton Mills Parish Council (Mr J Bercovici) [5059]	Comment	Question 2/3; We believe that the constraints listed for development in Mildenhall are an accurate reflection of the present situation.  We believe that the A11 is a natural boundary to the settlement at Red Lodge and that any development to the west of this road would be inappropriate and difficult to integrate into the community.	Noted.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23054 - Jockey Club Estates Ltd [4986]	Comment	<p>Although there are a number of general constraints identified for each settlement, there will be specific sites within the listed settlements which will have relatively few or none of the identified constraints. These will be the sites which can be seen to be deliverable for housing purposes and beneficial for housing allocation. When comparing and contrasting the constraints within the primary villages, Exning is the least constrained in terms of the number of constraints to development. It is important to note that the Inspector's Report on the Examination into the Forest Heath Core Strategy Development Plan Document (13 April 2010) para 5.18 states:-</p> <p>"They [primary villages] are places which could relieve development pressures on the more constrained towns. This is most notably the case at Exning which the IECA indicates has most potential for further growth. This should not be ignored because it provides additional flexibility for the CS which I consider should be incorporated into the spatial strategy (IC/16)".</p> <p>Since the CS Inspector's Report, Charles Church Developments has secured planning permission for 120 dwellings at Burwell Road, Exning, which demonstrates that Exning is a sustainable settlement which can accommodate growth. Indeed, the IDP (August 2015) which supports the SIR of CS Policy CS7 (August 2015) states for Exning under header 'Opportunity Areas' that there is a potential range of 1240-2170 homes capable at Exning.</p> <p>It should be noted that any new housing allocations adopted for Exning and Newmarket will be contingent on the successful mitigation of any possible detriment to the Horse Racing Industry Operations.</p>	<p>The comments are noted. The opportunities for growth in each settlement are considered on the basis of environmental and infrastructure constraints and available sites and infrastructure requirements.</p> <p>Detail on preferred sites in Newmarket and Exning will be included in the Site Allocations Local Plan.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23156 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>The Council neglects to identify the existing traffic situation in Newmarket as a constraint to development. This issue is highlighted in the 2009 IECA report. The NHG submitted substantial evidence to the recent Hatchfield Farm inquiry regarding this matter. Since then the Council has published the Deloitte Report into the impact of the horse-racing industry in Newmarket, which it had a draft version of when preparing the Single Issue Review. It is therefore somewhat surprising that the Council has not referred to the existing traffic constraints in Newmarket as the Deloitte Report clearly recommends further research into this issue (see pages 7 and 64).</p> <p>The NHG wishes it to be noted that the existing traffic situation in Newmarket is such that it presents an unacceptable conflict with the movement of horses around the town and also impacts on the ability of activities associated with the industry from moving freely around the town. As stated by the NHG at the Hatchfield Farm inquiry this existing situation is undermining the confidence of Newmarket as a destination for horse owners and training. The failing to rectify this matter will result in the decline of the industry with associated negative consequences for the local economy.</p> <p>The road network in Newmarket is constrained with limited, if any, scope for adjustment to mitigate the existing situation. The NHG considers that further substantial residential development in Newmarket cannot be delivered without exacerbating the exiting situation and causes significant negative impact on the horse-racing industry.</p>	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.
23213 - Mr James Fanshawe [6676]	Comment	<p>The information regarding Newmarket requires expansion in relation to the horse racing industry</p>	<p>It is considered that the information in the SIR is appropriate to support the draft options for consultation.</p> <p>Policies protecting the Horse Racing Industry are included in the Joint Development Management Document.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23048 - Racehorse Owners Association (Mr Richard Wayman) [12670]	Comment	No - the extent of the existing constraints within Newmarket are not adequate considered.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.
22987 - Pigeon Investment Management Ltd [7169]	Comment	<p>The aircraft noise constraint to the north of West Row described in paragraph 4.15 is not reflected in the assessment of two recent planning applications. Planning application DC/14/0632/OUT was approved at planning committee on the 3rd September 2014 with no objection raised on noise. This site of this planning application is to the north of West Row.</p> <p>Planning application number DC/14/2047/HYB has been supported by a noise assessment. The development is not expected to have an adverse impact on health or quality of life by noise created by the development, or from noise from surrounding areas. Any adverse impacts on health and quality of life can be mitigated by an appropriate glazing and ventilation strategy in the new homes.</p> <p>Paragraph 4.10 states that at Lakenheath the Stone Curlew Special Protection Area (SPA) limits expansion of the settlement. This should state that the SPA limits expansion to the east and south of Lakenheath. Other areas such as the north are outside the SPA and so offer opportunities for expansion.</p>	<p>The noise constraint area will be used to help assess the impacts of noise on any application for development.</p> <p>Site constraints will be used to help assess their suitability for development.</p> <p>The Site Allocations Local Plan will set out the preferred sites to meet the distribution in the Single Issue Review.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23576 - Rural Parish Alliance (Mr Bill Rampling) [12706]	Comment	<p>Development around Newmarket has become limited because of concerns from the horse racing community about the effects of traffic. The current Hatchfield Farm enquiry demonstrates that it is not only possible to mitigate against the traffic issues, but Newmarket would see a significant improvement to their highway infrastructure with additional development.</p> <p>A consistent approach to the inclusion of sites at Brandon in the site allocation document does not appear to have occurred. An understanding of development opportunities within an area is essential when considering the sustainable amount of housing growth to be allocated to that town or village. Consultation for the preparation of the Core Strategy 2010 concluded that Brandon could accommodate 240 houses on brownfield sites. This number has now been slashed to 55, which is simply an unsustainable number of houses to support the growing economy at Brandon. The low levels of growth at Brandon will limit the regeneration of the town.</p> <p>National planning policy encourages the re-use of brownfield sites and this approach is supported by the RPA. We believe a sequential approach to development should be taken, placing the majority of houses adjacent to the three market towns, evaluating suitable mitigation methods in order to relieve any impact to the horse racing community at Newmarket and building on the brownfield sites at Brandon where employment opportunities exist to support additional</p>	<p>The environmental and infrastructure capacity of settlements, their position in the settlement hierarchy in Policy CS1 of the Core Strategy, and commitments and completions since the start of the plan period will help determine the overall capacity appropriate for each settlement.</p> <p>Detail on preferred sites is set out in the Site Allocations Local Plan.</p>	None.
23057 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	<p>There is a high degree of uncertainty as to the switch of personnel and operations from RAF Mildenhall to USAF operations at Lakenheath and the timing and impact the arrival of two F-35 squadrons will have on existing Lakenheath residents and opportunities for growth. (This uncertainty is recorded at sections 3.10-3.12 of the consultation document.)</p>	<p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22906 - Hills Residential Ltd [12651]	Comment	Yes, but some of the assessments of the sites do not accurately reflect the impact (or lack of impact) the constraints have on them i.e. site RL/07 has been deferred but a submission has been made during this latest consultation period which demonstrates it should be included as an allocated site for mixed residential and commercial use.	Noted. Site constraints will be used to help assess their suitability for development.  The Site Allocations Local Plan will set out the preferred sites to meet the distribution in the Single Issue Review.	None.
23198 - Mr & Mrs B Rolfe [12682]	Comment	We are unable to comment on the accuracy or completeness of the identified constraints but clearly these will inform the areas which should be protected or avoided.  Para. 4.12 Beck Row We consider that Beck Row is a suitable location for significant growth over and above that required to meet local needs. The settlement is relatively unconstrained with opportunities to create a significant focus for future housing and employment. This can be achieved without coalescence with Holywell Row and outside the main aircraft noise constraints. We express concern as to the apparent piecemeal approach to development at Beck Row and consider that a Village Plan or Inset Proposals Map is required in order to guide future development.	A Policies map detailing sites and revisions to the settlement boundaries will be provided at the next consultation stage.	None.
23217 - Talavera Estates Ltd [12704]	Comment	We have summarised the constraints for each settlement in Table SIR 1.1 contained in Appendix SIR1, from information contained in the SIR document prepared by FHDC. The constraints appear to be an accurate reflection of those identified for each settlement although the existing constraints on key services such as the capacity of existing schools, healthcare and other community facilities have not been quantified.  Some of the constraints identified can be addressed through survey work, design changes and consultation with the relevant stakeholders to enable detrimental effects to be mitigated out. Whilst some constraints i.e. school places, are demand led rather than spatial, settlements need to have existing facilities in place or the capacity for growth to ensure that sustainable patterns of development can be achieved that meet the demands of communities during the Plan period.	Noted. Infrastructure constraints are detailed in the draft Infrastructure Delivery Plan.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23615 - Suffolk County Council (Mr James Cutting) [11903]	Comment	The section above describes only environmental constraints. The County and District Councils are already working together on Infrastructure Delivery Plans which identify infrastructure constraints on development.	Comments are noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
23539 - Moulton Parish Council (Mrs L Stone) [5222]	Comment	We do not believe that the Special Protection Area (SPA) in Brandon is more important than that at Lakenheath and Red Lodge, yet it seems to have been used to skew the options away from this much more sustainable market town to two smaller communities with poor infrastructure.	<p>The environmental and infrastructure capacity of settlements, their position in the settlement hierarchy in Policy CS1 of the Core Strategy, and commitments and completions since the start of the plan period will help determine the overall capacity appropriate for each settlement.</p> <p>There is land available at Red Lodge and Lakenheath outside of the SPA and its buffer zones that is suitable for development.</p>	None.
22889 - Mr Justin Wadham [12811]	Comment	No the constraints of Newmarket are vey inaccurately recorded	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23222 - Meddler Properties Ltd [6654]	Comment	<p>The SIR states that Kentford is a primary village, where small scale housing growth will be appropriate to meet local needs. The SIR lists the following constraints to growth in Kentford:</p> <ul style="list-style-type: none"> <li>land within Flood Zones 2 and 3 running north/south through the settlement; and</li> <li>Habitats Regulations designations for stone curlew.</li> </ul> <p>The habitats protection buffers are described in Core Strategy Policy CS2 and the effect is that very limited settlement expansion is possible to the south and east without demonstrating mitigation for the presence of the protected species.</p> <p>It is inappropriate to constrain the growth potential of a whole village based upon site-specific constraints within the settlement when the site allocations consultation document highlights a potential yield of 2000+ units. The Inspector's Report for the adopted FHDC Core Strategy noted the potential contribution of the Primary Villages (our emphasis):</p> <p>Primary Villages are expected to take some development but the spatial strategy aims to minimise development in the smaller settlements and the countryside. I generally endorse the Council's change but consider that the limitation on the number of dwellings considered acceptable should be deleted to increase flexibility</p> <p>5.18 The supporting text to Policy CS1 explains that these villages are capable of absorbing only small scale allocations because they possess limited services. Nevertheless, they are places which could relieve development pressures on the more constrained towns.</p> <p>We would ask FHDC to make clear that whilst flood and stone curlew are constraints they are not absolute constraints and as such the role that Kentford (and the Primary Villages more generally) can play should not be underestimated, as per the Inspector's previous comments. It is noted in the Site Allocations consultation document that Natural England commented the proposals in respect of previous planning applications at site K/02 were not likely to have a significant effect on stone curlew and that an appropriate assessment was not required.</p>	<p>The environmental and infrastructure capacity of settlements, their position in the settlement hierarchy in Policy CS1 of the Core Strategy, and commitments and completions since the start of the plan period will help determine the overall capacity appropriate for each settlement.</p> <p>The constraints detailed in section 4 provide background information used in assessing the appropriateness of sites.</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23193 - Animal Health Trust [4678]	Comment	AHT considers that the material in this section of the SIR provides a comprehensive and balanced account of the constraints in the District and those affecting particular settlements. AHT notes the comparative absence of constraints affecting Kentford, which justifies the high growth (in relation to the size of the existing village) scenario in all four options discussed under Question 4. Nonetheless, those constraints are important at the site specific level; they are dealt with in the response to the Site Allocations Local Plan.	Comments are noted.	None.
23185 - Crest Nicholson (Eastern) [11393]	Comment	Crest Nicholson considers that the material in this section of the SIR provides a comprehensive and balanced account of the constraints in the District and those affecting particular settlements.  In respect of the first bullet point in paragraph 4.11, it is considered that reference to "settlement expansion" should be changed to "expansion of the existing settlement boundary".  <i>In respect of the first bullet point in paragraph 4.11, it is considered that reference to "settlement expansion" should be changed to "expansion of the existing settlement boundary".</i>	Agree that this bullet point could be better worded.	Amend the wording of the bullet point in the next draft of the CS SIR document.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22973 - Mr Simon Thompson [12662]	Object	No - The constraints for Newmarket are not accurately recorded.  See answer to question 3 for more detail	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.
22979 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Object	No, Newmarket constraints are not properly recorded  See answer to question 3 for more detail	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22970 - Ms Sara Beckett [6689]	Object	No definitely not for Newmarket See answer to question 3 for more detail	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.
23075 - Bedford House Stables (Lucy Cumani) [12674]	Object	NO See answer to question 3 for more detail	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23146 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Object	no - the constraints for Newmarket are not accurately recorded  See answer to question 3 for more detail	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.
22992 - Newmarket Racecourses (Ms Amy Starkey ) [6377]	Object	No, the constraints, uniqueness and challenges that Newmarket faces are not adequately reflected and considered  See answer to question 3 for more detail	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22941 - Mr Richard Ward [12658]	Object	Absolutely not. The constraints for Newmarket are not an accurate reflection of the existing situation  See answer to question 3 for more detail	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.
23587 - John Gosden Racing LLP (Mr John Gosden) [12700]	Object	No - the constraints for Newmarket are not accurately recorded.	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22883 - Mrs Lucy Wadham [12642]	Object	No the constraints of Newmarket are very inaccurately recorded.  See answer to question 3 for more detail	The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.  Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).	None.
22786 - Historic England (Mr Tom Gilbert-Wooldridge) [12636]	Object	For most settlements, there is a lack of reference to heritage assets as potential constraints. Paragraph 4.1 quotes from paragraph 17 of the NPPF, but only mentions the natural environment core planning principle, when paragraph 17 also refers to the conservation of heritage assets. The historic environment, and heritage assets, form an important part of the overall environment and should be properly referenced.  Paragraph 4.3 briefly refers to features of archaeological and historic interest, but the commentary for each settlement excludes any reference to heritage assets, with the exception of Lakenheath Conservation Area and archaeology in Beck Tow.  <i>Greater reference to historic environment as environmental constraint is needed</i>	Response noted. We will continue to work with Historic England in the preparation and progression of the Single Issue Review to address issues raised in the most appropriate manner.	Advice taken, and heritage assets noted on a site-by-site basis.
22920 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Support	Yes. Cannot identify any further constraints to those already been addressed.	Comments are noted.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 3</i>				
23616 - Suffolk County Council (Mr James Cutting) [11903]	Comment	The section above describes only environmental constraints. The County and District Councils are already working together on Infrastructure Delivery Plans which identify infrastructure constraints on development.	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
23186 - Crest Nicholson (Eastern) [11393]	Comment	No	Noted.	None.
22921 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Comment	No.	Noted.	None.
23409 - Barton Mills Parish Council (Mr J Bercovici) [5059]	Comment	Question 2/3; We believe that the constraints listed for development in Mildenhall are an accurate reflection of the present situation.  We believe that the A11 is a natural boundary to the settlement at Red Lodge and that any development to the west of this road would be inappropriate and difficult to integrate into the community.	Noted. Please see the Site Allocations Local Plan for details of allocations at Red Lodge.	None.
23228 - Jaynic Investments LLP [12521]	Comment	Jaynic Investments LLP are unaware of any further constraints within Red Lodge to those listed at paragraph 4.11.	Noted.	None.
22960 - Mrs Anita de Lotbiniere [6677]	Comment	If traffic congestion in Brandon is to be used to justify a relief road being built, this could be better served by the building of a bridge to replace the level crossing at the end of the High Street.	Noted. This is a matter for Network Rail and is outside the council's remit.	None.
23170 - R J Upton 1987 Settlement Trust [12681]	Comment	No	Noted.	None.
22537 - Jane Tipper [12298]	Comment	Brandon has the further constraint at B12/17 of being within the setting of 3 listed buildings and the Conservation area.	Noted. Heritage constraints will be included for each settlement in the next consultation document.	Refer to heritage assets within settlements in the revised SIR document.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23223 - Meddler Properties Ltd [6654]	Comment	Kentford is not unduly constrained by the criteria identified in the SHLAA or SIR and should be considered for higher levels of growth in any resulting spatial distribution options, not limited to 130-140 as at present.	<p>The environmental and infrastructure capacity of settlements, their position in the settlement hierarchy in Policy CS1 of the Core Strategy, and commitments and completions since the start of the plan period will help determine the overall capacity appropriate for each settlement.</p> <p>The constraints detailed in section 4 provide background information used in assessing the appropriateness of sites.</p>	None.
23540 - Moulton Parish Council (Mrs L Stone) [5222]	Comment	The poor transport links in Lakenheath is an important constraint (only one through road) and there are few opportunities for employment locally. Red Lodge is designated as a key service centre but has no employment, poor transport links, and very poor infrastructure with on-going concerns regarding the capacity of sewage system.	The environmental and infrastructure capacity of settlements, their position in the settlement hierarchy in Policy CS1 of the Core Strategy, and commitments and completions since the start of the plan period will help determine the overall capacity appropriate for each settlement.	None.
23059 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	Suffolk County Council has arranged an independent developer-funded transport study in relation to proposed housing growth in Lakenheath. Until the outcomes of this study are known, expected Middle October 2015 there is a significant degree of uncertainty as to road capacity to accommodate the cumulative impacts of traffic arising from this new housing growth.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22974 - Mr Simon Thompson [12662]	Comment	Newmarket already suffers from traffic congestion at various times of the day. This traffic congestion in the town is an existing danger to the movement of horses around the town and also impacts on the day-to-day running of local businesses. Furthermore the lack of capacity of junction 37 of the A14, the tendency for Newmarket to be used as a bypass when the A14 is blocked and the limitations of the existing road widths through Newmarket mean that the town is regularly congested.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.
23194 - Animal Health Trust [4628]	Comment	NO	Noted.	None.
22882 - Mrs Lucy Wadham [12642]	Object	Yes, the council fails to allow for the appalling traffic congestion which Newmarket already suffers from daily and on some occasions to a gridlock degree. (when relevant sections of the A14 are closed, Newmarket is brought to a standstill for hours and hours on end). Even on normal days, present levels of congestion are a serious and continuing danger to the movement of horses around the town and damages local businesses. This must be focussed on and acknowledged when the council considers the constraints of the town.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23049 - Racehorse Owners Association (Mr Richard Wayman) [12670]	Object	Newmarket already suffers from traffic congestion and this is obviously a risk factor for horses walking between their stables and the training grounds. There have been a number of accidents in recent years and this constraint should be taken more seriously within the document. Owners also have concerns regarding increased noise levels, not ideal for thoroughbreds!	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23218 - Talavera Estates Ltd [12704]	Object	<p>The FHDC Draft Infrastructure Delivery Plan (IDP) to 2031 Consultation Draft August 2015, identifies the potential impact of growth on/tipping points for infrastructure and service delivery in market towns, key service centres, and primary villages. Whilst the existing infrastructure and opportunity areas for each of the settlements largely mirrors those identified in the SIR (as summarised in our Table SIR 1.1), there are a number of other constraints identified in the IDP which are not referenced in draft SIR Section 4 Environmental constraints to housing growth which should be included.</p> <p>Having undertaken a review of the constraints identified in the IDP, there are a number of additional constraints which are not listed in the settlement sections of the SIR. These additional constraints have been added to Table SIR 1.2 which is contained at Appendix SIR2. The Table indicates that there are additional settlement constraints including;</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> AQMA issues</li> <li><input type="checkbox"/> Landscape sensitivity</li> <li><input type="checkbox"/> Impact on key facilities</li> <li><input type="checkbox"/> Safety concerns</li> </ul> <p>Table SIR 1.2 also identifies additional traffic congestion and transport capacity issues which are identified in the IDP as being a potential constraint for all the settlements not just Brandon, as originally identified in the SIR and summarised in Table SIR 1.1. The IDP also highlights other issues for various settlements including coalescence, physical road constraints, Conservation Areas, MOD uses, County Wildlife sites, and horse and vehicle management issues.</p> <p>The IDP sets out various additional comments on the scale of growth and potential impact on infrastructure and service delivery in each of the settlements. This has not been quantified in Table SIR 1.1 and SIR 1.2 because it can be safely assumed that any additional growth is likely to impact on the capacity of existing infrastructure. Including all of the potential constraints in the IDP in Section 4 of the SIR, means that settlements which were previously highlighted as having few constraints are now more significantly</p>	<p>It is considered that the level of information in the draft SIR is sufficient to support the draft options.</p> <p>The IDP is just one of the many evidence base documents which supports the SIR. A summary of the key evidence used to support the production of the Single Issue Review will be available during the next consultation.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		constrained and vice versa. Newmarket and Lakenheath are shown to have the greatest number of constraints whilst the number of constraints is fairly evenly distributed amongst the remaining settlements. It is noted however that there is a balance to be struck between the numbers of constraints, their individual significance, for example European (SPA issues) versus localised (horse management) issues, and the magnitude of effects, although this should not constrain growth unless there is evidence that indicates otherwise. This is discussed further in Questions 4 and 5 below.		
23147 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Object	Newmarket already suffers from traffic congestion at various time of the day. This traffic congestion in the town is an existing danger to the movement of horses around the town and also impacts on the day-to-day running of local businesses. Furthermore the lack of capacity of junction 37 of the A14, the tendency for Newmarket to be used as a bypass when the A14 is blocked and the limitations of the existing road widths through Newmarket mean that the town is regularly congested.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22971 - Ms Sara Beckett [6689]	Object	Newmarket - traffic congestion has not and is not addressed either as it is presently or as it is likely to be in the future, even without an further development. It is a constraint now and needs to be recognised	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.
23077 - Bedford House Stables (Lucy Cumani) [12674]	Object	The council fails to recognise that the town already suffers from traffic congestion on a regular basis. The tendency to use Newmarket as a bypass when closures occur on either the trunk roads (A11/A14) has a huge negative impact on the congestion. This kind of congestion affects the movement of trainers, vets and horseboxes and their ability to move freely around the town. It also affects local residents and businesses.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23181 - Tattersalls Ltd (Mr John Morrey) [5726]	Object	Newmarket already suffers from traffic congestion at various times of the day. This traffic congestion in the town is an existing danger to the movement of horses around the town and also impacts on the day-to-day running of local businesses. Furthermore the lack of capacity of junction 37 of the A14, the tendency for Newmarket to be used as a bypass when the A14 is blocked and the limitations of the existing road widths through Newmarket mean that the town is regularly congested.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.
22992 - Mr Justin Wadham [12641]	Object	Yes, the council fails to allow for the appalling traffic congestion which Newmarket already suffers from daily and on some occasions to a gridlock degree. (When relevant sections of the A14 are closed, Newmarket is brought to a standstill for hours and hours on end) Even on normal days, present levels of congestion are a serious and continuing danger to the movement of horses around the town and damages local businesses. This must be focusses on and acknowledged when the council considers the constraints of the town.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22946 - Mr Richard Ward [12658]	Object	The traffic congestion that Newmarket experiences on a day to day basis is a real issue which is yet again ignored. Newmarket is a Market Town with unique elements which constrain movement in and around the Town which have to and should be considered. I do not feel they have, we live with it and is clearly not demonstrated on paper. The A14/A142 junction in both directions causes severe problems yet to be acknowledged by planners and the Town is frequently used as a diversion route when the A14 is blocked	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.
23517 - Rural Parish Alliance (Mr Bill Sampling) [12706]	Object	<p>We support Herringwell, Red Lodge and Tuddenham who have a serious infrastructure issue surrounding the removal of foul waste from Red Lodge to Tuddenham.</p> <p>The plight of the residents in these areas has been ignored and development which will impact on that system should not be encouraged until the problem has been addressed and resolved.</p> <p>We strongly object to a 78% increase in housing stock at Red Lodge. This is an unsustainable level of growth and will restrict appropriate development at other locations across the district. The infrastructure and services do not exist in this location to support such over development. The traffic will continue to seek out services in the market towns, causing major traffic issues in those locations and mitigation will prove impossible.</p> <p>A second school site has NOT been identified, has NOT undergone any consultation. Red Lodge school has now entered into special measures and the other small village schools are now also at capacity as parents are choosing to seek out alternative schools.</p>	<p>The environmental and infrastructure capacity of settlements, their position in the settlement hierarchy in Policy CS1 of the Core Strategy, and commitments and completions since the start of the plan period will help determine the overall capacity appropriate for each settlement.</p> <p>The constraints detailed in section 4 provide background information used in assessing the appropriateness of sites which are detailed in the Rural Site Allocations Local Plan.</p>	None.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23596 - Herringswell Parish Council (Su Field) [5165]	Object	<p>Sewerage and odour issues continue to blight the lives of residents in and around Herringswell and Red Lodge. The council produced Hyder report failed to address the problems and as a result, no improvements to the removal of waste from Red Lodge to Tuddenham have occurred.</p> <p>We strongly believe this needs to be resolved before any additional development occurs at Red Lodge and consider this is a necessary constraint to include when considering housing growth.</p>	<p>Noted. The distribution will be made in accordance with each settlements environmental and infrastructure capacity and will take into account existing commitments and completions since the start of the plan period. A revised Infrastructure Delivery Plan will accompany the preferred option Single Issue Review and Site Allocations Local Plan.</p>	None.
22983 - Newmarket Racecourses (Ms Amy Starkey ) [6377]	Object	<p>The document fails to acknowledge that there are existing problems in relation to traffic management in and around Newmarket as a result of being the home of horseracing. Alongside 18,000 residents, 3,000 horses are stabled in town as well as 350,000 visitors attending race meetings each year. The existing problem with traffic management is an existing danger to the safe movement of horses around the town as well as a challenge to businesses. Therefore problems must be acknowledged and addressed prior to any further development.</p> <p>The lack of infrastructure in and around Newmarket regularly causes significant congestion around key periods and race meetings, these problems are further exacerbated as a result of Newmarket High Street being the diversion route for the A14.</p>	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22787 - Historic England (Mr Tom Gilbert-Wooldridge) [12636]	Object	<p>There should be reference to the heritage assets found within and surrounding each settlement. This does not need to be exhaustive, but the presence of conservation areas, listed buildings, scheduled monuments and other archaeology should be highlighted. This will help to inform approaches to the distribution of housing growth.</p> <p><i>There should be reference to the heritage assets found within and surrounding each settlement. This does not need to be exhaustive, but the presence of conservation areas, listed buildings, scheduled monuments and other archaeology should be highlighted. This will help to inform approaches to the distribution of housing growth.</i></p>	Response noted. We will continue to work with Historic England in the preparation and progression of the Single Issue Review to address issues raised in the most appropriate manner.	Advice taken, and heritage assets noted on a site-by-site basis.
23157 - Newmarket Horsemen's Ground (NHG) [11392]	Object	Yes - traffic constraints as described above.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22840 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Object	In the consultation document the council fail to acknowledge that the traffic in Newmarket is a serious problem already.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document.</p> <p>Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.
23588 - John Gosden Racing LLP (Mr John Gosden) [12700]	Object	The council neglects to acknowledge that Newmarket already suffers from traffic congestion at various times of the day. This traffic congestion in the town is an existing danger to the movement of horses around the town and also impacts on the day-to-day running of local businesses. The council must acknowledge this issue when considering the relevant constraints of the town. The reference to 'the need to carefully manage the movement of vehicles and horses within the town itself' does not suggest that the existing problems are noted. The lack of capacity of junction 37 of the A14, the tendency for Newmarket to be used as a bypass when the A14 is blocked and the limitations of the existing road widths through Newmarket mean that the town is regularly congested. This is an important existing constraint that must be acknowledged.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23214 - Mr James Fanshawe [6676]	Object	not enough detail has been given to congestion. There is already an existing and well documented problem with traffic flow in Newmarket even at time when there are no horse movements. The physical lack of road space and the use of Newmarket for diversions when the A14 suffers problems are major existing constraints.	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p> <p>Further evidence used to inform Newmarket's constraints and opportunities include the Newmarket Vision's 'Newmarket Vision, enquiry by design workshop report'; SQW's 'The economic impact of the horseracing industry centred upon Newmarket' report (January 2014); and Deloitte's 'Local, national and international impact of the Horseracing Industry' report (September 2015).</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5. Housing distribution options</b>				
<b>5.1-5.2</b>				
22918 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Comment	Secondary villages and small settlements should not be ruled out for development under the IDP as small scale development such as 3-5 dwellings in such locations is unlikely to have a significant negative impact on the infrastructure of the village and indeed could contribute positively to the villages'/settlements' sustainability.	Noted. Small scale infill development can take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	None.
23060 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	Lakenheath should be removed as a Key Service Centre. It does not have a good range of services and facilities. The information relied on by the Council's consultants is materially out of date.  <i>Lakenheath should be removed from its classification as a Key Service Centre.</i>	Noted. The settlement hierarchy is set out under policy CS1 of the Core Strategy which is not being reviewed as part of the Single Issue Review.	None.
23280 - Mr & Mrs B Rolfe [12682]	Support	We support the categorisation of settlements and the inclusion of Beck Row as a Primary Village.	Noted.	None.
<b>Core Strategy Policy CS1: Categorisation of Forest Heath Settlements table</b>				
22948 - Bennett Homes [6665]	Support	Lakenheath is a Key Service Centre and therefore capable of a larger allocation than a smaller order centre with far more constraints (such as Beck Row in option 4). The draft Infrastructure Delivery Document lists out the services that are presently in the town - including a co-op convenience store, a GP surgery, library, post office, bank and several pubs. This means that new residents can meet many of their daily needs / errands within the town, rather than having to drive out.	Noted.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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5.3-5.4

23062 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	Lakenheath should be removed as a Key Service Centre. It does not have a good range of services and facilities. The information relied on by the Council's consultants is materially out of date.  <i>Lakenheath should be removed from it's classification as a Key Service Centre.</i>	Noted. The settlement hierarchy is set out under policy CS1 of the Core Strategy which is not being reviewed as part of the Single Issue Review.	None.
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5.5-5.10

23135 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	5.5 See Response to Questions 2 and 5	The 'issues and options ' version of the Single Issue Review (SIR) is informed by the requirements of the NPPF, existing planning policies, available evidence and any other primary legislation. The evidence available to the Council to inform the issues and options SIR did not indicate that a medium or high growth option for Brandon is deliverable and therefore a reasonable option.  No further evidence has been presented through the 2015 consultation to demonstrate that a higher level of growth at Brandon could be delivered with the necessary mitigation to ensure no adverse impact on protected species.	None.
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22592 - Kentford Parish Council (Mr Malcolm Baker) [12577]	Comment	Kentford Village - Please note that already approved developments (over 10) but not completed add up to 117. - Lambert Grove- 41, Kennett Park - 16 - Kentford Lodge- 60. In addition, there are 9 other houses on small developments that are approved or built/being built since March 2014. Kentford is already very close to the 130-140 barrier described in all options.	Noted. The distribution will be made in accordance with each settlements environmental and infrastructure capacity and will take into account existing commitments and completions since the start of the plan period.	None.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23597 - Herringswell Parish Council (Su Field) [5165]	Object	<p>5.7 The document clearly states that; "the levels of growth are relative to the size of the settlement (existing numbers of homes in the settlement/housing stock)</p> <p>We do not consider an increase of up to 78% in housing stock at Red Lodge to be relative to the size of the settlement as stated.</p> <p>In addition when considering growth, consideration should be given to current infrastructure levels and deficits. Red Lodge has seen massive housing growth, but remains void of the many services that are required to support a community. The village continues to suffer from an infrastructure deficit to support such large numbers of houses.</p>	The environmental and infrastructure capacity of settlements, their position in the settlement hierarchy in Policy CS1 of the Core Strategy, and commitments and completions since the start of the plan period will help determine the overall capacity appropriate for each settlement.	None.
23063 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	<p>Infrastructure in Lakenheath is a key constraint that has been seriously underplayed.</p> <p><i>Agreement for siting of new early years school.</i></p> <p><i>Upgrading removal of waste water.</i></p>	Noted. The specific infrastructure requirements for Lakenheath will be assessed through the Infrastructure Delivery Plan and the Site Allocations Local Plan.	None.
22950 - Bennett Homes [6665]	Support	5.8 The SA Technical Paper suggests that Lakenheath will achieve medium growth just through implementing existing planning permissions and therefore high growth is easily achievable as further non-constrained sites exist.	Noted. The distribution will be made in accordance with each settlements environmental and infrastructure capacity and will take into account existing commitments and completions since the start of the plan period.	None.
22952 - Bennett Homes [6665]	Support	A growth option, combining the 4 proposed Options would be supported provided Lakenheath retains its high growth figures due to the town's sites and relative ease at which high growth can be achieved. Option 4 promotes lower growth in Lakenheath, however the reasons for option 4 being preferable (as outlined in the sustainability appraisal) are not mutually exclusive with Lakenheath taking lower growth numbers.	Noted. The distribution will be made in accordance with each settlements environmental and infrastructure capacity and will take into account existing commitments and completions since the start of the plan period.	None.

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*Option 1 - Focus on Newmarket, Mildenhall and Lakenheath*

23190 - Crest Nicholson (Eastern) [11393]

Comment

Options 1 and 4: these are the least preferred because they provide the least opportunity to continue to build a thriving and sustainable community at Red Lodge. Indeed, they may make it much more difficult to achieve that.

In principle the point (third and first pro bullet respectively) about concentrating development at higher order settlements is a good one, and might apply in most other circumstances. However, in this particular case, the severity and spatial distribution of environmental constraints are such that this approach cannot be followed.

It is important to safeguard the interests of the horse racing industry, which is a mainstay of the local economy; these are likely to be adversely affected by both options.

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A lesser but still important identified disadvantage is that Beck Row and West Row are less sustainably located in terms of transport. Current and future residents of Red Lodge will have a greater level of services in the community; and to the extent which they need to rely on higher order services elsewhere, Red Lodge is located much closer to Newmarket.

Question 5: Are there any other distribution options that you think are viable and sustainable alternatives to those we have suggested?

Notwithstanding the response to Question 1 to the effect that the constraints to development in Forest Heath District are not so severe that a further 7,700 dwellings could or should not be accommodated in the Plan period, the constraints are nevertheless significant. Crest Nicholson cannot identify any viable or suitable alternative to those proposed.

Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.

Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23174 - R J Upton 1987 Settlement Trust [12681]	Comment	Options 1 and 4: these are the least preferred because they provide the least opportunity to continue to build a thriving and sustainable community on unconstrained land at Red Lodge. Indeed, they may make it much more difficult to achieve that. In principle the point (third and first pro bullet respectively) about concentrating development at higher order settlements is a good one, and might apply in most other circumstances. However, in this particular case, the severity and spatial distribution of environmental constraints are such that this approach cannot be followed. It is important to safeguard the interests of the horse racing industry, which is a mainstay of the local economy; these are likely to be adversely affected by both options. A lesser but still important identified disadvantage is that Beck Row and West Row are less sustainably located in terms of transport. Current and future residents of Red Lodge will have a greater level of services in the community; and to the extent which they need to rely on higher order services elsewhere, Red Lodge is located much closer to Newmarket.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23134 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	See Response to Question 5	The 'issues and options ' version of the Single Issue Review (SIR) is informed by the requirements of the NPPF, existing planning policies, available evidence and any other primary legislation. The evidence available to the Council to inform the issues and options SIR did not indicate that a medium or high growth option for Brandon is deliverable and therefore a reasonable option.  No further evidence has been presented through the 2015 consultation to demonstrate that a higher level of growth at Brandon could be delivered with the necessary mitigation to ensure no adverse impact on protected species.	None.
23158 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG considers that significant residential development cannot be delivered in Newmarket without very significant detrimental impact on the horse-racing industry.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

## Option 1 - Focus on Newmarket, Mildenhall and Lakenheath

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23065 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	For the reasons set out above, LPC objects to housing growth of 880-975. This option is flawed as it depends on Lakenheath being a Key Service Centre which it is not.  <i>Option 4 chosen.</i>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22766 - West Row Action Group (Mr John Smith) [12494]	Object	Although for selfish reasons we should support this option the over development of Lakenheath and the under development of Brandon are a concern .  <i>Take the development pressure off Lakenheath and do more to build up Brandon .</i>	Noted.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22780 - The Gredley Charitable Trust [12630] 22781 - Unex (No.3 ) Limited [12611]	Support	Option 1 is the correct option as it is the most sustainable. It is correct that the main settlements should take the majority of the growth and that the main town, Newmarket, should take the highest growth.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22759 - Ms Sarah Chaney [12545]	Support	I support Option 1 as the current infrastructure supports this level of development. In addition this option would have the least detrimental effect on the environment.	Comments noted.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22588 - Freckenham Parish Council (Mr Lawrence Barton) [12574]	Support	<p>Impact on Freckenham and Worlington</p> <p>Development on the Freckenham side of the A11 (West) will increase Elms Road Traffic The road has had many accidents where Air Ambulances have been involved.</p> <p>Comments on the Red Lodge Development</p> <p>Infrastructure is insufficient for the existing housing level. A second school is still insufficient</p> <p>In the CS7 we believe that the High Growth options 2, 3 and 4 are not sustainable. Option 1 is acceptable with some reservation.</p> <p>There is better potential to grow in the larger towns in the district.</p> <p>The growth to these towns equates to a smaller percentage increase to that community.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22968 - RWS Ltd. [12659]	Support	The Core Strategy identifies Newmarket, Mildenhall and Brandon as the three market towns and Lakenheath and Red Lodge as the two key service centres. Given the sustainability of these settlements development should therefore be distributed in the first instance to the market towns, and secondly to the key services centres. Lower growth should be focused on the less sustainable primary villages which are reliant upon the market towns and key service	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22778 - The Unex Group (Mr Stephen Walsh) [5804]	Support	Option 1 is the most sustainable option with the majority of the growth located in the main settlements. It is correct that the highest growth should be in the main town of Newmarket.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22779 - Tap Investments Limited [12632]	Support	Option 1 is the correct option as it is the most sustainable one. It is correct that the main settlements should take the majority of the growth and that the main town, Newmarket, should take the highest growth.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

Option 2 - Focus on Red Lodge and Lakenheath, with a planned extension at Red Lodge and medium growth at Newmarket and Mildenhall

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Option 2 - Focus on Red Lodge and Lakenheath, with a planned extension at Red Lodge and medium growth at Newmarket and Mildenhall</i>				
23173 - R J Upton 1987 Settlement Trust [12681]	Comment	Option 2: it is noted that three of the four identified advantages of this option are the same as for Option 3, including the first two. This option is considered slightly less desirable than Option 3, in that Option 3 places the greatest emphasis on the importance of development at Red Lodge, and because in proposing moderate levels of development at Newmarket, there is a risk, albeit slight in comparison with Options 1 and 4, of difficulties with its implementation.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23137 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	See Response to Question 5	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23139 - Crest Nicholson (Eastern) [11393]	Comment	Option 2: it is noted that three of the four identified advantages of this option are the same as for Option 3, including the first two. This option is considered slightly less desirable than Option 3, in that Option 3 places the greatest emphasis on the importance of development at Red Lodge, and because in proposing moderate levels of development at Newmarket, there is a risk, albeit slight in comparison with Options 1 and 4, of difficulties with its implementation.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23159 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG considers that this option still represents significant residential development and that it will have a significant detrimental impact on the horse-racing industry.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

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## Option 2 - Focus on Red Lodge and Lakenheath, with a planned extension at Red Lodge and medium growth at Newmarket and Mildenhall

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22955 - RWS Ltd. [12659]	Object	<p>Newmarket and Mildenhall are identified as market towns under the Core Strategy due to their sustainability, and therefore development should be distributed in the first instance to these settlements. This option focuses medium growth at Mildenhall and Newmarket, with higher growth focused on key service centres and primary villages. These settlements are less sustainable than the market towns and as such are inappropriate locations for such high levels of development, contrary to the sentiments of paragraph 14 of the NPPF.</p> <p><i>Key service centres and primary villages are less sustainable locations for development than market towns. Consequently more development should be focused on the market towns.</i></p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22760 - Ms Sarah Chaney [12545]	Object	<p>This option would have a large effect on the environment and infrastructure would require significant investment to support it.</p> <p><i>Significantly less growth in Lakenheath and Red Lodge</i></p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23066 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	<p>For the reasons set out above, LPC objects to housing growth of 880-975. Like Option 1, this is flawed as it depends on Lakenheath being a Key Service Centre which it is not.</p> <p><i>Option 4 chosen.</i></p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22764 - West Row Action Group (Mr John Smith) [12494]	Object	<p>We are not so supportive of this option as the future of Lakenheath base is not as assured as we would like .There is also an infrastructure problem with roads and other facilities in that area .</p> <p><i>Less emphasis on Lakenheath .</i></p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22908 - Hills Residential Ltd [12651]	Support	<p>Red Lodge is a highly sustainable location for residential development. This route will allow essential infrastructure improvements to Red Lodge whilst protecting the character of smaller villages elsewhere in the district.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

Option 3 - Focus on Red Lodge, with a planned extension, and focus on Mildenhall and Lakenheath with lower growth in Newmarket

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*Option 3 - Focus on Red Lodge, with a planned extension, and focus on Mildenhall and Lakenheath with lower growth in Newmarket*

23188 - Crest Nicholson (Eastern) [11393]	Comment	<p>Option 3: we welcome the identification of the first two advantages, which through its development interests at Red Lodge, Crest Nicholson would play a major part in realising. We also acknowledge the importance of the other two advantages. The only identified disadvantage relating specifically to Red Lodge concerns infrastructure. Crest Nicholson is well equipped to avoid or minimise any such disadvantage. Their development record at Red Lodge demonstrates their commitment to liaising with stakeholders to establish infrastructure requirements arising from their developments and where necessary planning for and funding required improvements. Furthermore, the Draft Infrastructure Delivery Plan to 2031 identifies development opportunity areas in Red Lodge including circa 350 dwellings to the north and east following on from master-planned development in the east. In respect of the foul drainage network it notes that there is currently spare capacity in the Tuddenham Water Recycling Centre to accommodate growth and any required upgrades will be funded by Anglian Water. In relation to the fourth disadvantage, the maintenance of a five year supply of land for housing is a means to an end, not an end in itself.</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, further distribution options have been developed for the next SIR consultation.</p>
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Option 3 - Focus on Red Lodge, with a planned extension, and focus on Mildenhall and Lakenheath with lower growth in Newmarket

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22589 - Freckenham Parish Council (Mr Lawrence Barton) [12574]	Comment	<p>Impact on Freckenham and Worlington</p> <p>Development on the Freckenham side of the A11 (West) will increase Elms Road Traffic The road has had many accidents where Air Ambulances have been involved.</p> <p>Comments on the Red Lodge Development</p> <p>Infrastructure is insufficient for the existing housing level. A second school is still insufficient</p> <p>In the CS7 we believe that the High Growth options 2, 3 and 4 are not sustainable. Option 1 is acceptable with some reservation.</p> <p>There is better potential to grow in the larger towns in the district.</p> <p>The growth to these towns equates to a small percentage increase</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>
23171 - R J Upton 1987 Settlement Trust [12681]	Comment	<p>Option 3: we welcome the identification of the first two advantages, which through its development interests and identified unconstrained land holdings at Red Lodge, The Landowner would play a major part in realising. We also acknowledge the importance of the other two advantages.</p> <p>The only identified disadvantage relating specifically to Red Lodge concerns infrastructure. The Landowner is well equipped to avoid or minimise any such disadvantage. The Draft Infrastructure Delivery Plan to 2031 identifies development opportunity areas in Red Lodge including circa 350 dwellings to the north and east following on from master-planned development in the east. In respect of the foul drainage network it notes that there is currently spare capacity in the Tuddenham Water Recycling Centre to accommodate growth and any required upgrades will be funded by Anglian Water.</p> <p>In relation to the fourth disadvantage, the maintenance of a five year supply of land for housing is a means to an end, not an end in itself.</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>

## Option 3 - Focus on Red Lodge, with a planned extension, and focus on Mildenhall and Lakenheath with lower growth in Newmarket

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23138 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	See Response to Question 5	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22762 - Ms Sarah Chaney [12545]	Object	This option would have a large effect on the environment and infrastructure would require significant investment to support it  <i>Significantly less growth in Red Lodge</i>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23068 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	For the reasons set out above, LPC objects to housing growth of 880-975. Like Options 1 & 2, Option 3 is flawed as it depends on Lakenheath being a Key Service Centre which it is not.  <i>Option 4 chosen.</i>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	
22956 - RWS Ltd. [12659]	Object	Newmarket is identified as a market town under the Core Strategy due to its sustainability, and therefore development should be distributed in the first instance to this settlement and the other market towns. This option focuses low growth Newmarket, with higher growth focused on Mildenhall, key service centres and primary villages. Whilst it is agreed that high growth should also be focused on Mildenhall these other settlements are less sustainable than the market towns and as such are inappropriate locations for such high levels of development, contrary to the sentiments of paragraph 14 of the NPPF.  <i>Key service centres and primary villages are less sustainable locations for development than market towns. Consequently more development should be focused on the market towns.</i>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22763 - West Row Action Group (Mr John Smith) [12494]	Support	This option makes most sense . The development is where there is the capacity for growth and the infrastructure .	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.



Option 3 - Focus on Red Lodge, with a planned extension, and focus on Mildenhall and Lakenheath with lower growth in Newmarket

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23160 - Newmarket Horsemen's Group (NHG) [11392]	Support	The NHG considers that this level of development can be delivered without significant adverse impact on the horse-racing industry on the assumption that associated traffic movements and interaction with horse movements can be satisfactorily addressed.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

*Option 4 - Focus on Newmarket, Mildenhall and Red Lodge with more growth in those primary villages with capacity*

23175 - R J Upton 1987 Settlement Trust [12681]	Comment	Options 1 and 4: these are the least preferred because they provide the least opportunity to continue to build a thriving and sustainable community on unconstrained land at Red Lodge. Indeed, they may make it much more difficult to achieve that. In principle the point (third and first pro bullet respectively) about concentrating development at higher order settlements is a good one, and might apply in most other circumstances. However, in this particular case, the severity and spatial distribution of environmental constraints are such that this approach cannot be followed. It is important to safeguard the interests of the horse racing industry, which is a mainstay of the local economy; these are likely to be adversely affected by both options. A lesser but still important identified disadvantage is that Beck Row and West Row are less sustainably located in terms of transport. Current and future residents of Red Lodge will have a greater level of services in the community; and to the extent which they need to rely on higher order services elsewhere, Red Lodge is located much closer to Newmarket.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23139 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	See Response to Question 5 continued in full rep	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

Option 4 - Focus on Newmarket, Mildenhall and Red Lodge with more growth in those primary villages with capacity

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23191 - Crest Nicholson (Eastern) [11393]	Comment	<p>Options 1 and 4: these are the least preferred because they provide the least opportunity to continue to build a thriving and sustainable community at Red Lodge. Indeed, they may make it much more difficult to achieve that.</p> <p>In principle the point (third and first pro bullet respectively) about concentrating development at higher order settlements is a good one, and might apply in most other circumstances. However, in this particular case, the severity and spatial distribution of environmental constraints are such that this approach cannot be followed.</p> <p>It is important to safeguard the interests of the horse racing industry, which is a mainstay of the local economy; these are likely to be adversely affected by both options.</p> <p>1011/SIRI_O_repsfv/2015-10-06 4</p> <p>A lesser but still important identified disadvantage is that Beck Row and West Row are less sustainably located in terms of transport. Current and future residents of Red Lodge will have a greater level of services in the community; and to the extent which they need to rely on higher order services elsewhere, Red Lodge is located much closer to Newmarket.</p> <p>Question 5: Are there any other distribution options that you think are viable and sustainable alternatives to those we have suggested?</p> <p>Notwithstanding the response to Question 1 to the effect that the constraints to development in Forest Heath District are not so severe that a further 7,700 dwellings could or should not be accommodated in the Plan period, the constraints are nevertheless significant. Crest Nicholson cannot identify any viable or suitable alternative to those proposed.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23161 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG considers that significant residential development cannot be delivered in Newmarket without very significant detrimental impact on the horse-racing industry.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

Option 4 - Focus on Newmarket, Mildenhall and Red Lodge with more growth in those primary villages with capacity

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22761 - West Row Action Group (Mr John Smith) [12494]	Object	<p>This would move the development from the A11. A14 corridor where there is both the infrastructure and the capacity to the villages where there is neither . The infrastructure investment to even make this option possible would not be achievable .</p> <p><i>Move the development to where the infrastructure and need is .</i></p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22590 - Freckenham Parish Council (Mr Lawrence Barton) [12574]	Object	<p>Impact on Freckenham and Worlington</p> <p>Development on the Freckenham side of the A11 (West) will increase Elms Road Traffic The road has had many accidents where Air Ambulances have been involved.</p> <p>Comments on the Red Lodge Development</p> <p>Infrastructure is insufficient for the existing housing level. A second school is still insufficient</p> <p>In the CS7 we believe that the High Growth options 2, 3 and 4 are not sustainable. Option 1 is acceptable with some reservation.</p> <p>There is better potential to grow in the larger towns in the district.</p> <p>The growth to these towns equates to a smaller percentage increase to that community.</p> <p><i>There is better potential to grow in the larger towns in the district.</i></p> <p><i>The growth to these towns equates to a smaller percentage increase to that community.</i></p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22959 - RWS Ltd. [12659]	Support	<p>The Core Strategy identifies Newmarket and Mildenhall as market towns and Red Lodge as a key service centres.</p> <p>Given the sustainability of these settlements development should therefore be distributed here in the first instance.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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**6. Summary of distribution options and questions**

*Summary of distribution options*

22767 - West Row Action Group (Mr John Smith) [12494]	Comment	Option 3 seems the most deliverable option to us .	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23162 - Newmarket Horsemen's Group (NHG) [11392]	Object	<p>Table explaining level of growth (first table)</p> <p>The percentage increase in growth rises in 5% increments from medium level upwards. However, the scale of growth described as low is up to 10%. The growth attributed to Newmarket in option 2 is described as medium but a footnote confirms that the level of increase identified does not fit the definition of medium growth. The same issue arises with Mildenhall.</p> <p>The NHG considers that it is more appropriate to introduce a new category between low and medium growth with a value of between 5% and 10%. The definition of low and medium growth can then be adjusted accordingly and the definition of the level of growth will then match the values identified.</p> <p>The NHG is concerned that the description of medium growth could be misinterpreted in the future such that the actual level of growth represents the current value in the first table - i.e. 10% - 15%, which would be far higher than is currently identified in the second table in this section.</p>	Comments are noted.	The presentation of the distribution options will differ in the next consultation draft and will define actual housing numbers rather than low/medium/high growth levels.

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*Representations*

*Nature*

*Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

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*Question 4*

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23219 - Talavera Estates Ltd [12704]	Comment	<p>We have not ranked the distribution scenarios in order of preference because we consider there is a more suitable option (please see Question 5). The NPPF makes clear at paragraph 17 that growth should be actively managed to make the fullest possible use of public transport, walking and cycling, and to "focus significant development in locations which are or can be made sustainable". However, the four scenarios proposed in the draft SIR do not reflect the adopted settlement hierarchy for FHDC in the Core Strategy and the requirements of paragraph 17 of the NPPF.</p> <p>The Core Strategy was adopted in 2010 before the NPPF but the settlement hierarchy is based on the services, facilities and capacities within the settlements to accommodate additional growth and is considered to accord with the NPPF. Policy CS1 of the Core Strategy identifies the three market towns of Brandon, Mildenhall and Newmarket, as the most sustainable locations for growth where the highest proportion of new development should be directed.</p> <p>However in each of the four Options for growth only "low growth" of 50-55 dwellings for the Plan period is proposed in Brandon. In the draft SIR each of the four Options state that the low growth in Brandon recognises the environmental constraints of the town and that distributing housing away from Brandon will protect the environmental designations from the negative effects of development. Each of the Options also state that the low level of growth would limit opportunities for the regeneration of the town, and would encourage higher levels of growth elsewhere i.e. the key service centres and primary villages, which are not as sustainable as they do not have the services, facilities and capacities of the settlements at the top of the hierarchy.</p> <p>Given that other settlements including Mildenhall, Lakenheath and Red Lodge, are also recognised in the SIR to have SPA issues, it seems unreasonable to restrict growth in Brandon on this basis when higher levels of growth are proposed in these other settlements. Moreover, high growth was previously proposed in Brandon under Policy CS7 and was quashed for</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

**Representations**

**Nature**

**Summary of Main Issue/Change to Plan**

**Council's Assessment**

**Action**

distribution rather than SPA issues which can in any case be overcome through ecological survey work, and suitable mitigation in agreement with the local authority, Natural England and other relevant stakeholders as evidenced by Chapter 11 Ecology of the ES including the Habitat Regulations Assessment (HRA).

The HRA which is included at Appendix 11.2 of the Environmental Statement to the land west of Brandon planning application, sets out the mitigation strategy for stone curlew, as informed by discussions with Natural England through their Discretionary Advice Service (DAS). The DAS correspondence from Natural England dated 20 June 2014 states that the 1,500m buffer zone around the SPA "does not mean that development within the buffer is unacceptable, but signals to developers that it will be challenging to ensure proposals within this zone will be compliant with the requirements of the Habitat Regulations". The DAS sets out a strategy for mitigation which is based on their advice and suggests that;

- Generally Natural England advise that 16ha of good quality semi-natural habitat is required per pair of stone curlew
- Mitigation areas will need to be delivered in large blocks and attached to or linking existing areas of good quality semi-natural habitat
- Will need to be secured with a long term management programme.

Although Natural England are preparing a stone curlew model or "tool", they have advised that the application proceeds as though the tool is not going to be developed in time to inform the application. It should also be noted that the advice on the hectares per pair is based on previous examples and not an adopted methodology.

The HRA as part of the planning application to the west of Brandon sets out the methodology, pathways of impact, likely significant effects and the Appropriate Assessment (AA) of both the Breckland SAC and SPA. The HRA informs Chapter 11 Ecology of the ES which concludes that once the development is complete and operational, with the mitigation

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>measures in place, the effects are reduced from major adverse to negligible. The development would therefore not have an adverse effect on the integrity of the SPA designation and the stone curlew, or the nightjar and woodlark which it supports.</p> <p>As we go on to discuss in Question 5 below, the distribution scenarios presented in the draft SIR should therefore be revisited in light of the proposed methods for mitigating impacts on the SPA, the advanced discussions with Natural England, the Applicants commitment to ensuring mitigation of effects, and the other social, economic and environmental benefits that development in Brandon can bring over the Plan period. These benefits are detailed in Section 6.0 of the Planning Statement that accompanies the application on land to the west of Brandon.</p>		
23748 - BBA Shipping and Transport Ltd (Mr Kevin Neatham) [12680]	Comment	<p>1. most preferred - option 3 2. option 2 3. least preferred - options 1 and 4</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22596 - Mrs Heidi Hathaway [12578]	Comment	Exning can not cope with more houses. The roads are already struggling with the traffic and we haven't yet had the 120 houses built. The school is also up to capacity.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23224 - Meddler Properties Ltd [6654]	Comment	The general approach in SIR Option 4 is preferred but the levels of growth for the Primary Villages should be reconsidered for the reasons highlighted within this representation.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22769 - West Row Action Group (Mr John Smith) [12494]	Comment	<p>1/ Option 3. 2/ Option 1. 3/ Option 2. 4/ Option 4.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23044 - J Braybrooke [12668]	Comment	<p>My order of preference is            1st - no 2            2nd - no 1            3rd - no 3            4th - no 4</p> <p>My reason is Exning is a small village. Roads are already very busy (traffic wise) the school not big enough for more children, why should new local children have to go out of the area for schooling. Building in Burwell Road is not a good idea taking valuable farming land, once the 1st quota is finished it is open to more building.            Northend has a planning app for two and two caravans near horses. Mr Gredley isn't allowed to build on ex stables.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23621 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>PRIMARY EDUCATION</p> <p>Each Market Town, Key Service Centre and Primary Village is served by one or more primary schools. In the case of Kentford, the village is served by Moulton Primary School outside the parish, and some children attend Kennett Primary School just over the border in Cambridgeshire.</p> <p>The following table provides a commentary on the different distribution options, and potential options for mitigating the impact on schools.</p> <p>An iterative approach to site choices and the implications for school place provision needs to be taken, and the County Council would be pleased to facilitate this approach as the District considers its preferred options.</p> <p>Please note that the table of Primary School provision options is based on the January 2015 pupil forecast and housing as at March 2014. This means that the table does not take into account applications submitted or permitted since March 2014, which may affect the District's decision as to where further housing growth is to be distributed.</p> <p>PLEASE SEE TABLE ON PAGE 7 OF THE ATTACHED DOCUMENT</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
23541 - Moulton Parish Council (Mrs L Stone) [5222]	Comment	<p>None of the options given provide any choice for development in Brandon, Exning or Kentford therefore we do not agree with these options for the distribution and would have liked to have seen distributions indicated in the core strategy for major development to be be centred in the most sustainable locations which are the three market towns in the District.</p> <p>However if we are required to rank these options, Moulton Parish Council proposes:</p> <p>First choice 1 Second choice 4 Third choice 2 Fourth choice 3</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23187 - Crest Nicholson (Eastern) [11393]	Comment	Crest Nicholson's preferences are in this order: 1: Option 3 is the most preferred 2: second choice is Option 2 3 and 4: least preferred are Options 1 and 4.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23195 - Animal Health Trust [4678]	Comment	AHT notes that all four options propose the same amount of development at Kentford (130-140 dwellings). As a result, Kentford is not referred to in the pros and cons in this section of the SIR, so these do not require comment. The proposed level of development, but as a minimum rather than a ceiling, is supported. However, AHT also has an interest in what it regards as the proper and timely planning of the District. It wishes to see an adopted development plan in place as soon as possible, especially given the long delay (four and a half years) since the outcome of the legal challenge which quashed such fundamental parts of the Core Strategy, and the additional time now anticipated for the completion of the process.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22871 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12686]	Comment	3 first 2 second 1 & 4 joint fourth	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23042 - EB & J Sugden [12666]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> </ol> <p>My reason is Newmarket is in need of affordable homes and therefore major development should be where the requirement is required. There is little need for primary villages to be included in these developments. In particular Exning which currently has about 850 homes and already has plans in progress to develop 120 houses along Burwell Road. Exning is a small village with roads made for horses and not cars and lorries. We daily see horses being ridden from stables for exercise.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22775 - Mr Paul Munns [12563]	Comment	<p>1-2-3-4 Newmarket is in dire need of affordable homes, Lakenheath is expanding and needs more infrastructure and the S106 will help them while Mildenhall is a large sustainable market town. Red Lodge school is in special measures already and the primary villages already have more than enough housing coming already. Exning in particular is full and has no wish to be annexed to Newmarket."</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23056 - Jockey Club Estates Ltd [4986]	Comment	<ol style="list-style-type: none"> <li>1. Object - joint 4th place</li> <li>2. Object - 3rd place</li> <li>3. Support - 1st place (subject to satisfactorily addressing highway issues in Newmarket).</li> <li>4. Object - joint 4th place (with the exception that Exning, as a primary village with capacity is appropriate for further allocation).</li> </ol>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23450 - Barton Mills Parish Council (Mr J Bercovici) [5059]	Comment	<p>Question 4/5: We believe that development should be concentrated in the three market towns which are the most sustainable locations with employment and service provision nearby, thus reducing the need for travel on inadequate rural roads. Although recognising the environmental constraints in Brandon, we think it may be possible to site more development there than currently proposed by making full use of brown field sites.</p> <p>Newmarket has the best services and is nearer to Cambridge and is therefore the most sustainable location and as much development as possible should take place there.</p> <p>We think that further development should be avoided in Red Lodge until community provision has improved (eg a second school) and the community has been allowed to have time to develop as a community. High and very high growth is not appropriate here at present.</p> <p>We would therefore prefer an option with higher growth than shown in Newmarket and Brandon and low growth in Red Lodge.</p> <p>We would rank the distribution scenarios listed in the order 1, 4, 2, 3.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23229 - Jaynic Investments LLP [12521]	Comment	Options 2 and 3 are supported, whilst it is considered that options 1 and 4 would be undeliverable.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22933 - Mr Justin Wadham [12641]	Comment	1 for the most preferred and 4 for the least preferred	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23182 - Tattersalls Ltd (Mr John Morrey) [5726]	Comment	Rank 1. Most preferred - option 3 Rank 2. option 2 Rank 3 & 4 least preferred - option 1 and 4	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22622 - Mr R E Bye [12597]	Comment	My order of preference 1 2 3 4  My reason is Affordable homes needed all round, Red Lodge School need improving (teaching standards) 120 homes already planned for Exning, school if full, only 1 shop	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22654 - C V Lines [12587]	Comment	My order of preference is 3 2 1 4  My reason is the other areas are not appropriate	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23622 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>SECONDARY EDUCATION</p> <p>Forest Heath is served by Mildenhall College, Newmarket College and IES Breckland (a free school). Each school currently has spare capacity, although Mildenhall College is expected to exceed its current capacity by the end of the forecast period - 2019.</p> <p>Under each of the development scenarios proposed, Newmarket College could respond to the housing growth on its current site. In the early part of the plan period, growth could be absorbed without a need to expand the school's physical capacity. After capacity is used up, developer contributions would be required to expand the school buildings.</p> <p>Different options exist for managing growth in the Mildenhall College catchment. Mildenhall College itself may be able to expand to absorb some growth, particularly given opportunities arising from the Mildenhall Hub project. Some of the pupils arising from the housing growth could be absorbed by the Free School at IES Breckland, and some pupils (particularly those from Red Lodge) could head south to Newmarket College.</p> <p>But the number of pupils arising in the Mildenhall Catchment is potentially sufficient to justify the opening of a new secondary school. This is perhaps the most sustainable option in that it provides greater flexibility for future Local Plans.</p> <p>The need for this school should be discussed over the coming months. If it is needed, the location should be based upon the distribution of housing and minimising the need for pupils to travel. On this basis, and the potential development scenarios outlined as part of the Single Issue Review, the optimal location could be at either Mildenhall, Lakenheath or Red Lodge.</p> <p>Further exploration and investigation of this topic will be needed as the Plan advances to the next consultation stage.</p> <p>SEE TABLE ON PAGE 9 OF THE ATTACHED</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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23043 - T Pike [12667]	Comment	My order of preference is Focus one (1)  My reason is far more space for development and room for increased traffic than Exning.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, further distribution options have been developed for the next SIR consultation.
22618 - Mr Oliver Stephenson [12591]	Comment	Mr order of preference is 1 2 3 4  My reason is housing need is primarily in the towns, where the infrastructure already exists to cater for additional population that will come with new housing. Villages are least able to accommodate extra housing and do not require larger scale developments. Housing stock is needed in Newmarket where people work, shop, go out, and therefore need to live. Towns already have transport links (rail, bus, roads), schools and facilities that will be needed for increased population.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22613 - S Lines [12586]	Comment	My order of preference is 3 2 1 4  My reason is my preference offers the space and facilities needed for such planning	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22907 - Hills Residential Ltd [12651]	Comment	3,2,4,1	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22939 - Pigeon Investment Management Ltd [7169]	Comment	We do not consider that the scenarios offered provide a suitable range of options. Their either miss the opportunity to deliver homes in high order settlements or miss opportunities to deliver homes in sustainable areas. The closest scenario to achieve this is Scenario 1, however to deliver the housing that is required primary villages that must be allocated higher levels of growth, and the constraints of Newmarket should be recognised.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23041 - E Braybrooke [12665]	Comment	My order of preference is 1st - 2 2nd - 1 3rd - 3 4th - 4 My reason is there are houses being built on land behind Burwell Road at a sustainable rate also there is more land for extra houses there. There are 1 or 2 houses being built on a small plot of land and several houses have been built at the end of Windmill Hill Road. We are also probably going to take a small romany site. The infrastructure including school cannot sustain wholesale building it is a VILLAGE.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23619 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>EDUCATION</p> <p>The scale of growth required will require significant additional education provision. Whilst the County Council is able to access some central government funding towards additional school places, it is an established planning principle that development should fund the infrastructure needed to mitigate its impacts.</p> <p>This places a cost on development. The District Council should consider whether, through allocating housing development to locations where school places can be provided more cost-effectively, there is potential for reducing development costs, increasing the likelihood of housing delivery and maximising the amount of affordable housing which can be required from sites.</p> <p>By providing the information below, the County Council seeks to highlight issues relevant to different patterns of growth. This relates to information included in the draft Infrastructure Delivery Plans and options for the overall level of housing growth.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
22954 - Bennett Homes [6665]	Comment	<p>1. = 1 2. = 1 3. = 1 4. = 4</p> <p>Options 1, 2 and 3 are all equally preferred by Bennett Plc as they recognise Lakenheath's capability to accommodate future sustainable growth</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23215 - Mr James Fanshawe [6676]	Comment	<p>option 3 - most preferred Rank 1 option 2 - rank 2 options 1 and 4 - least preferred rank 4</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22833 - Mrs Olivia Pitts [12639]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> </ol> <p>My reason is Newmarket needs affordable housing and has adequate infrastructure as does Mildenhall. Both Lakenheath and Red Lodge require more infrastructure. Villages do not have adequate infrastructure and should remain distinct. Exning already has a large new housing development planned and shouldn't be annexed by either Newmarket or Burwell!</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>
23209 - Breckland District Council (Mr Iain Withington) [11700]	Comment	<p>Breckland Council also welcomes that all four of Forest Heath District Council's housing distribution options now propose a low scale of growth (50 - 55) dwellings for Brandon.</p> <p>Breckland Council welcomes that approach and the acknowledgment that before any more ambitious scale of development is proposed significant further evidence is required to address such matters as:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Environmental impact on the Brecks and other ecologically sensitive habitats</li> <li><input type="checkbox"/> Flooding</li> <li><input type="checkbox"/> Landscape impact and the issues of avoiding any coalescence between Brandon and Weeting or undue harm to the landscape setting of either settlement</li> <li><input type="checkbox"/> Analysis of the need for a relief road for Brandon post the dualling of the nearby A11</li> </ul> <p>Regarding this last bullet point above, Breckland Council's position remains consistent that prior to any relief road for Brandon being promoted there needs to be an appropriate transport study undertaken to evidence the need (which should include at least two or three years worth of monitoring data post implementation of the A11 dualling).</p>	<p>Noted and agreed that significant additional evidence would be required to demonstrate a more ambitious scale of growth in Brandon would be appropriate. The council will continue to liaise with Breckland Council as appropriate through the preparation and production of the SIR.</p>	<p>None.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22624 - Mr Paul Winter [12556]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> </ol> <p>My reason is The air bases are being reduced and there must be scope for existing and new house development. Also, road and schools and doctors, should be already in place.</p> <p>Red Lodge is over populated with very little in the place of doctors schools etc. infrastructure could be much better, as with facilities.</p> <p>Newmarket is in great needs for affordable housing, if the horse racing industry is to address their diminishing staff problem. Therefore Hatchfield Farm has all the networks and good or better facilities to develop. It's position shouldn't affect the horse racing industry, being located away from training grounds and horse movements or racing stable locations.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23222 - Mr & Mrs B Rolfe [12682]	Comment	<ol style="list-style-type: none"> <li>1. Option 4</li> <li>2. Option 2</li> <li>3. Option 1</li> <li>4. Option 3</li> </ol>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
223264 - Mildenhall Parish Council (Mr Chris Emmerson) [12685]	Comment	<p>Councillors of Mildenhall Parish Council</p> <p>Have proposed Option 2 - Focus on Lakenheath and Red Lodge, with planned extension at Red Lodge and medium growth at Mildenhall/West Row and Newmarket</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22984 - Newmarket Racecourses (Ms Amy Starkey ) [6377]	Comment	<ol style="list-style-type: none"> <li>1. option 3</li> <li>2. option 2</li> <li>4 = option 1 and 4</li> </ol>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22623 - Mrs D Bright [12598]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> </ol> <p>My reason is the towns need much more affordable housing. Red Lodge needs more infrastructure before extension. Exning school is full and the winding roads are already busy with traffic from Burwell and the A14</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23171 - R J Upton 1987 Settlement Trust [12681]	Comment	<p>The Landowner preferences are in this order:</p> <ol style="list-style-type: none"> <li>1: Option 3 is the most preferred</li> <li>2: second choice is Option 2</li> <li>3 and 4: least preferred are Options 1 and 4.</li> </ol>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22832 - Mr & Mrs TM & CA Gowing [12638]	Comment	<p>Our order of preference is</p> <ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> </ol> <p>Our reason is jobs, education, facilities are in the towns and where people want to be. Infrastructure is in place also many primary villages are already due for expansion.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22927 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Comment	<p>Top preference = option 4.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22563 - Mr John Gowing [12554]	Comment	<p>1 2 3 4.</p> <p>Newmarket has ideal space on the hatchfield site and should be priority as the demand is homes in Newmarket. lakenheath can be developed further with extra infrastructure put in place and mildenhall already has facilities which can be expanded to cope. red lodge has been poorly served to date with infrastructure not being suitable ie full school already and drainage issues. The primary villages have enough housing already and no services to support more.</p> <p>exning is already taking 120 new houses on burwell road and is now full and cannot become an annex to Newmarket.</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>
22949 - Mr Richard Ward [12658]	Comment	<p>Distribution option [1] = 4th Distribution option [2] 2nd Distribution option [3] 1st Distribution option [4] = 4th</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>
23678 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p><b>HORSERACING AT NEWMARKET AND ITS HINTERLAND</b></p> <p>The Local Transport Plan and Forest Heath Core Strategy both recognise the significance of horse racing at Newmarket. Reports by SQW (2014) and Deloitte (2015) demonstrate the economic importance of the industry, and the way in which the industry operates as 'an ecosystem', with different component parts.</p> <p>The County Council is committed to working with local partners to consider ways in which Newmarket can grow in a balanced way; protecting and promoting Newmarket's status as an international horse racing centre of excellence, whilst also meeting the needs of all residents and other economic sectors.</p> <p>The County Council would be pleased to continue participating actively through the Newmarket Vision, working with the District Council, Town Council, Horseracing Industry and other stakeholders to achieve the best possible outcomes for the Town.</p>	<p>Comments noted.</p>	<p>The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22961 - RWS Ltd. [12659]	Comment	Ranking in order of preference: 1 - 4 - 2 - 3	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22615 - Mr & Mrs G and E O'Neill [12588]	Comment	My order of preference is 1  My reason is facilities and access much more suited to expansion Already have larger roads for increase in traffic	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22990 - Mrs Anita de Lotbiniere [6677]	Comment	Order of preference 1. Option 4. Better protection for sensitive environment round Lakenheath. Emphasis on development in larger urban areas with better existing infrastructure. 2. Option 2. Development concentrated in Red Lodge which would therefore require more infrastructure to be installed. Better protection for smaller villages. 3. Option 1. More development in larger urban centres and protection for smaller villages. 4. Option 3. Could manage more in Newmarket rather than at the expense of Lakenheath and Red Lodge.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22975 - Ms Sara Beckett [6689]	Comment	Distribution options Equal 4th Option 1 Equal 4th Option 4 2nd Option 2 1st Option 3  Newmarket could not sustain high or medium growth I have doubts about even lower growth with the constraints of the Town and delivering the required infra structure which to provide effectively would have its own constraints	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22715 - Mr & Mrs H D Scott [12611]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> </ol> <p>My reason is</p> <p>A. traffic in and through Exning is already at it's safety peak</p> <p>B. Facilities in Exning school already full with no room for expansion about to lose post office</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23623 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>FIRE AND RESCUE</p> <p>It is important to consider the overall scale and distribution of housing growth in relation to the ability of the Suffolk Fire and Rescue Service to provide services to new and existing development.</p> <p>The Suffolk Fire and Rescue Service do not foresee any problems arising from the four distribution options proposed, or any need for additional service provision. This is based on existing service conditions, and development will be monitored in case service requirements change during the plan period.</p> <p>Individual sites will need to ensure suitable access for fire appliances and provision of water supplies (fire hydrants). Automated sprinkler systems are encouraged, but cannot automatically be required.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
23163 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<ol style="list-style-type: none"> <li>1. Object - joint 4th place</li> <li>2. Object - 3rd place</li> <li>3. Support - 1st place (subject to satisfactorily addressing highway issues)</li> <li>4. Object - joint 4th place</li> </ol>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23578 - Rural Parish Alliance (Mr Bill Rampling) [12706]	Comment	<p>The options do not support a holistic approach to development across our district. The SIR has taken 4 years to reach this consultation stage and despite many meetings with the RPA, planners and councillors to discuss the infrastructure constraints experienced in the rural villages and the adhoc approach to planning by developers, the options have failed to address these issues.</p> <p>The RPA support a sequential approach to development, placing the majority of development in and around the 3 market towns where the infrastructure exists to support the additional housing.</p> <p>We do not support very high development at Red Lodge. The additional development suggested for very high growth is not relative to the existing housing stock level. This is not a sustainable option for locating growth. Employment is not available in this location; the school is at capacity and the services do not exist to support this number of additional houses. This will lead to a massive infrastructure deficit and residents seeking out the necessary services from the market towns adding to their traffic issues.</p> <p>We would like to see the brownfield capacity being utilized in Brandon and a higher proportion of development offered at Newmarket where there is a clear need for more affordable housing.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23620 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p><b>EARLY EDUCATION</b></p> <p>The County Council has a statutory duty to facilitate the childcare market and to ensure the provision of sufficient childcare which is responsive to parents' needs. At present this equates to a need to ensure that parents can access 15 hours per week of free early education for all 3 and 4 year olds. Eligible 2 year olds can also access the same level of provision.</p> <p>The Government has also announced that it will legislate to double free childcare available for all working parents of 3 and 4 year olds to 30 hours a week. It is intended that this will come into operation from 2016.</p> <p>Based on current statutory arrangements, it is estimated that every hundred new dwellings will create a demand for ten additional early education places.</p> <p>Given the proposed changes in statutory arrangements, it should be assumed that no capacity is available from existing providers. This can be reassessed as the Local Plan moves to the next consultation stage.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
23070 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	<p>1.Option 4 This is the only viable option that can be agreed at this stage within the constraints.</p> <p>2.Option 1</p> <p>3.Option 2</p> <p>4.Option 3</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22620 - Mr Paul Grover [12595]	Comment	<p>My order of preference 2 3 1 4 (2 being preferred option)</p> <p>My reason is Mildenhall, Newmarket (Hatchfield Farm), Red Lodge and Lakenheath all have easy access to A11 and A14. If the demand for housing comes from commuters then transport viability must be of prime importance. If commercial/industrial development is planned - where is it?</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22976 - Mr Simon Thompson [12662]	Comment	<p>1. Most preferred - option 3 2. Option 2 3. Least preferred - options 1 and 4</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23216 - Five Villages Preservation Trust (Dr Allan Marchington) [5854]	Comment	<p>* Very High Growth at Red Lodge is not supported. This location is already suffering from an infrastructure deficit and such levels of growth would create a village the same size as Brandon. High growth at Red Lodge might not be deliverable and would leave the local plan once again open to ad hoc development if housing development fell below the 5 year housing land supply.</p> <p>* An increase in housing stock of 78% as suggested through the very high growth option at Red Lodge is not proportional to the size of the village or the resources and infrastructure available there.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22619 - Mrs Rosemary Grover [12592]	Comment	Cannot answer without first knowing where commercial/industrial development is to take place.	Noted. The Site Allocations Local Plan sets out employment allocations across the district. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22562 - Mr Simon Cole [12517]	Comment	1-2-3-4 Newmarket is in dire need of affordable homes, Lakenheath is expanding and needs more infrastructure and the S106 will help them while Mildenhall is a large sustainable market town. Red Lodge school is in special measures already and the primary villages already have more than enough housing coming already. Exning in particular is full and has no wish to be annexed to Newmarket.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23598 - Herringswell Parish Council (Su Field) [5165]	Comment	<p>We do not support any of the options in their current forms, but unfortunately due to limited resources, our Parish Council would be unable to employ the necessary team of people required to offer an alternative choice.</p> <p>We note the need for affordable housing at Newmarket and do not consider the housing distribution options would adequately address these issues.</p> <p>It has been shown that growth is possible at Newmarket and suitable mitigation can be made available to limit the impact of development on the horse racing industry.</p> <p>In addition developers are offering to upgrade the road infrastructure and horse walks to improve any current traffic issues and to mitigate against any issues which arise as a result of new development.</p> <p>Enormous pressure and boundless funding has been applied at Newmarket to ensure development is rejected, putting unnecessary emphasis for development on the rural villages.</p> <p>We do not support options 2 and 3 for 'very high development' at Red Lodge and consider this would be a totally unsustainable option.</p> <p>Very high development as promoted in options 2 and 3 at Red Lodge would result in a housing stock level greater than that found at Brandon. This is not a sustainable option. We are staggered that such an option has been presented twice in this document.</p> <p>There is no low growth option suggested for Red Lodge and the growth presented in the 4 options would mean an increase in growth ranging from 13% to a massive 78%!!</p> <p>In comparison we can see that the growth options for Newmarket are as low as 3.7% and they only rise to a maximum of 20%. Sustainable development follows a sequential approach to development, placing the majority of development on the edge of towns before</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>

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considering rural locations which are void of services and infrastructure.

Options 2 and 3 would require Red Lodge to provide more housing than Brandon currently has, in an area which is almost void of services even for the current level of housing,

The table below clearly demonstrates the poor infrastructure available at Red Lodge.

Brandon Red Lodge		
Doctors Surgeries	3	1
Dental Practice	2	1
Nursing Home	1	0
Police Station	1	0
Paramedic Service	1	0
Firestation	1	0
Library	1	0
Primary School	2	1 (At capacity)
Secondary Free School	1	0
Supermarket	3	0
Convenience Store	Several	1
Train Station	1	0
Cemetery	1	0
Petrol Station	1	0
Bank	1	0
Hotel	5	0
Take aways	9	2

The New Anglia Strategic Economic plan intends to "transform the economy of Norfolk and Suffolk and establish the New Anglia area as a centre of global business excellence". To this end, they have set out a plan to harness the "district sector strengths and our natural assets to deliver more jobs, new businesses and housing"

The plan has "identified all the places in our area that host high impact sector activity ..." "For each growth location, we have set out the priority sectors supported, the housing and jobs expected to be delivered and the place- specific interventions necessary to deliver this growth ..."

The document makes it clear that it has been

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developed in partnership with and endorsed by a wide range of stakeholders, which for our region, include; Forest Heath District Council and Mathew Hancock MP.

The plan clearly supports growth at Newmarket with levels in line with those suggested by options 1 and 4. "Economic growth in the corridor is supported by housing growth planned at Attleborough (4,000) and Thetford (5,000), Brandon (730), Mildenhall (1,070) and Newmarket (1,230)".

Very high development at Red Lodge is unsustainable when considering the current infrastructure and the economic opportunities for employment in this rural location.

The level of growth at Red Lodge as presented in options 2 and 3 is not relative to the size of the settlement as claimed in the consultation documents.

Development over the last plan period has proved unsatisfactory at Red Lodge. The infrastructure deficit left residents feeling the village was a ghost town and many referred to it as "Dead Lodge" . The school and some of the community facilities were eventually built but unfortunately, the school faced difficulties from the day the doors were opened which has resulted in the school now entering "special measures". The school is at capacity and a second school is already required, a little over 4 years after opening. The schools headmistress and governors have opposed any further development at Red Lodge until they have been able to address the current problems faced by the massive development of the village. Any further over development of this village would continue to exacerbate these problems.

Developer funding would not realise the necessary contributions to enable all the additional infrastructure requirements and public money is not available for these upgrades either.

If considering only the 4 options available in the consultation document, we would like to point out that we do not agree with ANY of the options, but in order

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to prevent a decision being made without our engagement we have ranked the 4 options, but we consider they are far from ideal.

In order of priority with the options available it would be:-

- 1st choice; Option 1
- 2nd choice; Option 4
- 3rd choice; Option 2
- 4th choice; Option 3

In addition we would like to point out that the need for preparing this SIR has arisen out of a high court challenge and a quashing of parts of the former plan based upon "technicalities". This has however resulted in the whole district having to re consider the distribution of housing where the main drive of this document is to "moth ball" 2 of our major market towns, preventing any sensible level of growth and "dump" the remaining development in the rural villages where sustainable development will prove impossible, but a convenient option to developers.

We note that the former policy CS 7 agreed development of 240 houses at Brandon on brownfield sites and we would support the use of development in brownfield locations.

We would also point out the recent investment made by FHDC of £537,000 into the private homes builder, Omar homes at Brandon. Housing development should go hand in hand with economic growth and as employment opportunities' are pitiyngly low at Red Lodge, very high levels of development should not be considered or suggested.

We agree with a sequential approach to development and support the allocation for maximum growth in and around our market towns where infrastructure exists to support additional housing development.

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22621 - Ms Sarah King [12596]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> </ol> <p>My reason is I think Newmarket in particular has the infrastructure to support more houses being built and there are more jobs in Newmarket, Mildenhall and Lakenheath. Lakenheath has more jobs coming and will therefore need more housing. Exning, as a primary village, is already at full capacity.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23589 - John Gosden Racing LLP (Mr John Gosden) [12700]	Comment	<ol style="list-style-type: none"> <li>1. joint least preferred - rank joint 4th</li> <li>2. rank 2nd place</li> <li>3. most preferred - rank 1st</li> <li>4. joint least preferred - rank joint 4th</li> </ol>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22633 - Ms Anna Wilks [12599]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> </ol> <p>My reason is the towns need the extra affordable homes and the towns already have the infrastructure and facilities Exning cannot take any more traffic in its little old roads.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22533 - Jane Tipper [12298]	Comment	<p>Options in order of preference: 1,4,2,3. Newmarket is by far the most sustainable location as identified by the SoS. Mildenhall and Lakenheath are more sustainable than the villages. Red Lodge has suffered enough from overdevelopment and inadequate infrastructure and needs time to recover. The respect shown to Brandon's constraints is admirable and correct.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23140 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	See Response to Question 5	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23627 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>TRANSPORT</p> <p>The consultation document proposes growth of between 370 and 385 dwellings a year over 20 years, totalling 7000 to 7700 dwellings between 2011 and 2031. The AECOM report prepared to support the 2010 Core Strategy examined the broad locations and allocations put forward in the Spatial Options housing provisions at that time, and assessed their possible transport facilities and infrastructure requirements. It is noted that there have been some changes to the location of committed growth since 2011 following the revocation of CS7. The District is currently considering four scenarios;</p> <ol style="list-style-type: none"> <li>1. Focus on Mildenhall, Newmarket and Lakenheath</li> <li>2. Focus on Lakenheath, Red Lodge, with medium growth at Mildenhall and Newmarket</li> <li>3. Focus on Red Lodge, Lakenheath and Mildenhall with lower growth in Newmarket</li> <li>4. Focus on Mildenhall, Newmarket and Red Lodge with increased growth in primary villages</li> </ol> <p>The Suffolk County Council Local Transport Plan identifies the importance of sustainable growth in managing the impact on the highway network. Development is considered sustainable where housing is provided close to areas of employment and where key infrastructure and facilities are provided. This provides the greatest opportunity for the use of sustainable modes of transport, thereby minimising the increase in traffic on the local network. The location and concentration of growth within the identified towns together with the level and location of employment growth are key factors in assessing the impact of development. Suffolk County Council has therefore committed to undertake further work with the District Council to ensure that the issues for the different areas of growth are understood and identify areas where further transport assessment is required to build on the work undertaken in 2009.</p> <p>With regards to the locations of growth identified in the options assessment to date the following points are raised for consideration.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.

*Representations*

*Nature*

*Summary of Main Issue/Change to Plan*

*Council's Assessment*

*Action*

Newmarket was identified as one of the key areas of growth in the 2010 Core Strategy. The town is the home to an internationally significant horse racing industry, contributing a unique complexity to movements on the highway network. The County Council is part of the Newmarket Vision Transport Delivery Group that has worked to develop infrastructure improvements across the town to address concerns about safety from the horse racing industry. This work has informed requests for infrastructure improvements associated with the planning process and will continue to form the basis of future section 106 contribution requirements. The key issues that need to be considered for growth in Newmarket are the impact of additional traffic on horse movements and the horse movements on other highway movements; the junction of the A14 junction 37 and the local highway network has been identified as requiring improvement; the impact of growth on the Air Quality Management Area along the High St and the assessment of increased movements through the town from the surrounding area, notably Exning and Kentford.

Mildenhall has some internal constraints on capacity that may impact on the level of growth within the town, the location of this growth will be key to assessing this impact. There has been a long term aspiration for a relief road for the town, it is noted that there are significant environmental impacts associated with the routes previously considered, in addition the level of growth is unlikely to be of the scale to deliver the relief road through development contributions.

More evidence would be needed to support the District Council's view that there are currently congestion issues associated with Beck Row.

For Brandon it is not anticipated that the current proposed level of growth will be significant. The Brandon relief road is not required to deliver development of the scale proposed in this document, but to address current transport issues particularly associated with the level crossing. The County Council will also be undertaking a review of the impact of the recent A11 improvements on traffic movements

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		through the town.  It should be noted that funding for improvements required to deliver growth should wherever possible be delivered through the development.		
22616 - Gillian Wiseman [12589]	Comment	My order of preference is 2 1 3 4  My reason is as a resident of Exning I would like to point out that we already have a housing estate planned along the Burwell Road. Houses have been built in the Windmill Hill Area. The Old Forge has been converted into two dwellings, bungalows have been demolished in Icen Way and houses erected in their large gardens. There are more houses were the social club once stood and more in King's old builders yard, no doubt the chapel will go the same way. How will the school and other services cope with an influx of extra people ps I'm given to understand that we now have a travellers site.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22835 - Exning Parish Council (Mrs Cathy Whitaker) [5139]	Comment	Exning Parish Council feels that future development in Forest Heath should be concentrated on the market towns of Brandon, Newmarket, Mildenhall and on the key service centre of Lakenheath: we feel these provide more sustainable locations, opportunities to make more use of brownfield sites, are near to town centre locations which will reduce the reliance on cars and provide more opportunities for secondary education.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

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22612 - Mr R Rix [12585]	Comment	<p>Order of preference 2 3 1 4</p> <p>My reason is traffic could be managed easier on option 2 Concerns shown about can infrastructure cope with the larger sites? The larger developments in Newmarket and Exning would be detrimental to the Horse Racing Industry</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>
22986 - Mrs Anita de Lotbiniere [6677]	Comment	<p>It is hard to balance the impact of development where the infrastructure is known to need improvement with that where infrastructure is apparently viable, but which might be challenged with increased development.</p> <p>All options give Brandon a low growth which recognises the sensitive surrounding environment but mentions that this low growth might limit opportunities for regeneration. This does not recognise that regeneration would be possible with injection of investment as there are many vacant houses and sites on the industrial estates and much room for expansion without new housing.</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>
22728 - Mr Sebastian Gosden [12618]	Comment	<p>3 Best option but Newmarket cannot support this many houses without serious traffic problems! - The town's road system is impossible to improve as everyone must go through the Clock Tower roundabout - this fundamental design flaw is impossible to alter. The traffic is already horrendous, and that's before the town become a through-way for diverted traffic from the A14!</p> <p>2 No completely unworkable as regards Newmarket, why is Brandon not allowed to grow?</p> <p>4 No completely unworkable as regards Newmarket, why is Brandon not allowed to grow?</p> <p>1 No completely unworkable as regards Newmarket, why is Brandon not allowed to grow?</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23050 - Racehorse Owners Association (Mr Richard Wayman) [12670]	Comment	1. (Preferred) option 3: focus on Red Lodge 2. option 2: focus on Lakenheath 4. (least preferred) Options 1 and 4	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23617 - Suffolk County Council (Mr James Cutting) [11903]	Comment	The District Council is best placed to manage conflicting priorities in respect of the planning system and the County Council's role is to identify relevant issues to assist the District in carrying out this task.  The following paragraphs identify issues relevant to the distribution options described and are set out in relation to relevant County Council service areas. The services listed are considered relevant to the overall distribution of housing. Other services, such as archaeology and public rights of way, are settlement and site-specific and so are considered in relation to the Site Allocations document.	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.
23618 - Ms Jacqui Reggiani [12664]	Comment	Mr order of preference is 1 2 3 4  My reason is traffic through Exning is already a problem with marked and dangerous congestion at particular points. The infrastructure is already beyond capacity, particularly school placements and doctors surgery. Newmarket particularly has a need for greater housing but Exning already has planned housing that is beyond it's current capacity.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22617 - D Hitchcock [12590]	Comment	My order of preference is 2 3 1 4  My reason is any development at Red Lodge and Lakenheath would not interfere with the horse racing industry and planning applications would be more readily granted	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

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23624 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>HEALTH, WELLBEING AND SOCIAL CARE</p> <p>In considering the distribution of housing growth, the District Council should consider the specific needs of an ageing population. Spatial choices might be influenced by the household requirements of residents, the accessibility of services and the availability of public transport.</p> <p>Given that the population is ageing, this increases the benefits of ensuring that housing is well related to key services, such as retail, public transport and health provision. Equally, housing in rural areas may be less attractive to people needing to access employment in the larger settlements.</p> <p>The County Council would be pleased to help the District Consider the housing needs of different groups in the community; particularly in terms of assessment of need for housing with care, meeting the requirement set out in paragraph 162 of the National Planning Policy Framework.</p> <p>Directing development to locations with good access to sports and recreation provision (including a strong public rights of way network) will help deliver better health outcomes. Therefore, the District Council should consider how the distribution of housing might enable better access to sport and recreational facilities, and healthy modes of travel, as a means of improving health outcomes.</p>	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22789 - Historic England (Mr Tom Gilbert-Wooldridge) [12636]	Object	<p>From a historic environment perspective, it is hard to rank the scenarios in order of preference given the range and distribution of heritage assets throughout the district. Each scenario will have an impact on heritage assets, and it will depend to some extent on where sites allocations are identified.</p> <p>The Single Issue Review technical paper does not refer to the historic environment when it discusses 'environmental constraints' for different growth options. This is an omission which means that potential impacts on heritage assets have not been properly considered.</p> <p><i>The 'pros' and 'cons' bullet points for each scenario should include appropriate reference to the historic environment based on the different options.</i></p> <p><i>The Single Issue Review technical paper does not refer to the historic environment when it discusses 'environmental constraints' for different growth options</i></p>	Noted. The council looks forward to continuing to work with Historic England as the Single Issue Review and Site Allocations Local Plan progress.	<p>The constraints section in the Single Issue Review refers to heritage assets for individual settlements.</p> <p>Decisions on preferred sites in the Site Allocations Local Plan have taken into account heritage assets which are referred to as necessary.</p>
22789 - Mr Paul Shaves [12580]	Object	<p>3-2-1-4 community, and the local people, the primary villages of with Exning in particular is full to capacity and does not have the infrastructure to s Red lodge has some infrastructure already in place in regards to the schooling, lakenheath is expanding and will need more infrastructure. While Mildenhall already has an existing market town. Newmarket is in need of some affordable homes to support the racing ustain any further growth. Exing has no desire to be annexed to Newmarket with the lose of the boundaries.</p> <p>3-2-1-4</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22573 - Mr Neville Collinge [12562]	Support	<p>1, 2, 3, 4 Mildenhall and Newmarket require affordable homes. (Newmarket more so). Lakenheath population is likely to expand with proposed changes to the airbase. The primary villages do appear to have sufficient housing for their location and Exning has more than enough housing without an extensive increases to the amenities. Also it should not be adjoined to Newmarket.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22597 - Mrs Heidi Hathaway [12578]	Support	My preference is option 1 above. Focus on Mildenhall, Newmarket and Lakenheath.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23121 - C.J Murfitt Ltd [12677]	Support	Preferred order of options for housing distribution is: 4, 1, 3, 2. This will enable housing delivery in the District to meet the objectively assessed housing need and the affordable housing requirements in the District.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22584 - Mr Simon Cole [12517]	Support	1,2,3,4 in that order. New market is where the houses are needed. Red Lodge is at breaking point. Lakenheath needs a few more houses and S106 money for infrastructure. Primary Villages are not the right way to go.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22583 - Miss K Amanda Tanner [12582]	Support	Focus on 1, 2, 3, 4 Mildenhall is a large sustainable town with good infrastructure and airbase soon to close leaving plenty of development potential. Exning (primary village) should not be annexed to Newmarket.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

*Question 5*

23202 - Mr & Mrs B Rolfe [12682]	Comment	We have indicated a preference for focusing growth within what we have called the "central corridor" within the District. That is, the area to the south of Lakenheath and to the north of Red Lodge but excluding those two settlements. We consider the three settlements of Mildenhall, West Row and Beck Row are best placed to create a focus or hub for growth whilst diverting pressures away from the more sensitive parts of the District. We also consider that the injection of growth focused on the above three settlements will assist with the far-reaching impacts of changes in the defence industry.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	None.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23813 - Tuddenham St Mary Parish Council (Ms Vicky Bright) [5908]	Comment	<p>The proposed 5 year plan highlights small, low population areas such as Lakenheath, Red Lodge &amp; Kentford as areas to see medium-high % house building in relation to current populations.</p> <p>The towns such as Newmarket, Mildenhall &amp; Brandon are expected to see very small % house building. These towns are where the schools, roads and services are and this is where the med-high house building should be not in smaller villages.</p> <p>Development should be linked to and conditional on new infrastructure building ie schools, roads and waste.</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23220 - Talavera Estates Ltd [12704]	Comment	<p>To promote sustainable development in accordance with the NPPF and meet the housing needs of the District, high growth should be proposed in each of the three market towns including Brandon. This will encourage a sustainable pattern of development by building on the existing key credentials of the market towns including transport links, healthcare, education, leisure and community facilities and will also support local and rural economies including tourism, without putting additional pressure on the less sustainable locations in the District.</p> <p>As identified in the draft SIR, the draft SAD and planning application documents submitted for land to the west of Brandon in particular Chapter 6 Socio-Economics of the ES, existing infrastructure including primary schools, GP and dental surgeries and the local road network, are already beyond capacity. Therefore even the low growth proposed in Brandon would have an impact on the sustainability credentials of the town. In comparison, high growth in Brandon will enable the resolution of a number of housing, infrastructure and environmental issues and the regeneration of the town as detailed in Section 6.0 of the Planning Statement. This can be delivered through a privately funded comprehensive scheme rather than smaller piecemeal developments that will only exacerbate existing growth issues.</p> <p>Brandon is recognised in the Infrastructure and Environmental Capacity Appraisal (IECA) (2009) as having environmental capacity for a range of 630 to 1,000 new houses whilst only 50-55 are currently proposed in the draft SIR. Chapter 6 Socio-Economics, Chapter 7 Traffic and Transport of the ES and the Planning Statement which accompany the planning application, identify the full range of existing services, facilities and the capacity of Brandon to accommodate growth.</p> <p>Despite existing infrastructure issues, Brandon is a more sustainable location for development, and distributing growth to less sustainable locations in the settlement hierarchy will put pressure on less sustainable settlements including key service centres and primary villages, as evidenced by the draft</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Infrastructure Delivery Plan (IDP). The distribution scenarios in the SIR should therefore distribute more growth in Brandon to encourage sustainable development, enable the regeneration of the town, alleviate infrastructure issues, and enable suitable environmental safeguards as evidenced by the conclusions of the Environmental Statement and Planning Statement.</p> <p>The planning application submitted on land to the west of Brandon is yet to be determined. The submitted ES has demonstrated that the scheme can be implemented without adverse effects on the integrity of the SPA as concluded by the mitigation proposed in the Environmental Statement. The "low growth" option for Brandon should therefore be revisited to promote more growth in the town.</p>		
23183 - Tattersalls Ltd (Mr John Morley) [5726]	Comment	RAF Mildenhall which will provide a further alternative for housing distribution	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	None.
22993 - Mrs Anita de Lotbiniere [6677]	Comment	<p>These options appear a bit lopsided. Are there special reasons why Kentford should nearly double its number of houses? It is High Growth in all the options. It might be difficult for Lakenheath to support high growth in view of the surrounding SPAs and SACs but only one option offers medium growth.</p> <p>It might be possible for Brandon to support more than 50-55 dwellings in the period between now and 2031 if there are pockets completely within the Settlement Boundary which would not impinge too much on the sensitive areas surrounding it.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23090 - CgMs (Mr Matthew Eyre) [12619]	Comment	The alternative sustainable option of developing the Balmcrest site (SHLAA reference: ER/03) and Land at Little Eriswell (SHLAA reference: ER/04) to create the sustainable settlement of Little Eriswell should be considered to meet the 7700 new dwelling target over the plan period.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23225 - Meddler Properties Ltd [6654]	Comment	<p>The options put forward are based upon a housing target for a historic 2013 OAHN figure. Nevertheless, we would comment that the options are not particularly distinct from one another and all four options take a very conservative view on the growth potential of the Primary Villages. The Inspector that examined the FHDC Core Strategy was keen to avoid needlessly constraining the contribution of all Primary Villages, as noted in his Inspector's Report. Exning and Kentford's levels of growth remain constant under all options; with only the Primary Villages of Beck Row and West Row identified for increased growth under SIR Option 4 (Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity). As drafted, the document is inferring that there is only limited growth potential (130-140 units largely based on outstanding consents). This figure does not tally with the number of draft sites put forward in the draft Site Allocations consultation document (potential yield of 2000+ units). The previous High Court case was brought by a consortium of national and international horseracing interests who opposed a 1,200 unit urban extension in Newmarket on the basis that it would seriously undermine Newmarket's status as a world class centre of racing excellence. In <i>Save Historic Newmarket Ltd v. Forest Heath District Council</i> [2011] EWHC 606, the High Court quashed parts of the FHDC Core Strategy, where there was a lack of coverage and assessment of reasonable alternatives and increases to housing provision, and a failure in terms of explanation as to why the nominated alternatives had been rejected:</p> <p>"40. .... It was not possible for the consultees to know from it what were the reasons for rejecting any alternatives to the urban development where it was proposed or to know why the increase in the residential development made no difference. The previous reports did not properly give the necessary explanations and reasons and in any event were not sufficiently summarised nor were the relevant passages identified in the final report. There was thus a failure to comply with the requirements of the Directive and so relief must be given to the claimants." Given the previous High Court action was brought</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet overall housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	None.

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based upon concerns that housing growth in Newmarket could impact on the horse racing industry, the options test varying levels of growth at Newmarket but they only proposed a static growth quanta for Kentford, Exning and Brandon. The High Court highlighted issues with a perceived lack of reasonable alternatives and adequate justification for the chosen spatial strategy. Therefore, FHDC should test and consult on reasonable alternatives that direct more growth to the Primary Villages, commensurate with their role as third tier settlements in the settlement hierarchy.

The SIR infers that Kentford has 'taken its fair share' and as such the options disregard any reasonable alternatives for the village above 140 units. However, as stated the site allocation document includes a potential yield within Kentford of 2000+ units and the updated 2015 IDP provides analysis of a scenario based upon 250-440 and does not identify any insurmountable infrastructure constraints. As such higher growth should be considered at Kentford as a serious reasonable alternative.

The SIR states that the options that follow have all taken into consideration the following issues:

- the need for the distribution of growth to accord with national and local policy, in particular the existing settlement hierarchy in Core Strategy Policy CS1
- the high number of environmental constraints in the district
- known infrastructure constraints
- the availability of land to meet the distribution options

We consider this approach to be too narrow and does not account for potential mitigation and opportunities. The approach and methodology for spatial distribution should reflect the policies of the NPPF, namely paragraphs 151, 152, 154, 158 which require plans to contribute to sustainable development; explore alternative options to reduce negative impacts; address spatial implications of economic, social and environmental change; and utilise up to date proportionate evidence base. The Planning Practice Guidance ("PPG") provides further guidance relevant to spatial distribution of growth:

Local Plans should make clear what is intended to happen in the area over the life of the plan,

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where...this will occur...setting out broad locations and specific allocations of land for different purposes...supported by such other information...to best explain the spatial application of development plan policies

Local Plans should be tailored to the needs of each area in terms of their strategy and the policies required

The Local Plan should aim to meet the objectively assessed development and infrastructure needs of the area

Options for spatial distribution of growth should also be informed by the PPG section for assessing housing and economic land (Methodology - Stage 2: Site/broad location assessment - Estimating the development potential of each site/broad location) which provides guidance on how to treat development constraints<sup>8</sup> and the factors that should be considered when assessing the suitability of broad locations for development.

Site K/02 was categorised as a deferred site in the updated SHLAA (August 2015) and as such was not subject to detailed site assessment with the reason for deferral being flooding and equine policy constraints. The SHLAA methodology states that where Flood Zones are present at least 50% of site should be within Flood Zone 2 or 3. 50% of site K/02 is not flood zone, it is closer to 20% and it should not be deferred for this reason. Since Spring 2015, site K/02 has been in agricultural use and this was accepted by FHDC officers within a report to Development Control Committee in June 2015. As such, the August 2015 update to the SHLAA should not have identified the equine policy as a policy constraint. Had site K/02 been assessed it would have been found to be Suitable, Available and Achievable as per PPG guidance for site assessment. The evidence for constraints in respect of site K/02 is inaccurate.

To be considered a reasonable alternative an option needs to present a way of meeting the objectives of the plan (R (Friends of the Earth) v Welsh Ministers [2015] P.T.S.R. D28). Whilst FHDC has substantial discretion in exercising their planning judgement to define what is 'reasonable'; the out-of-date evidence used to inform the four options and housing target (SHMA 2013, Viability evidence 2009/10) and flawed

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		approach followed in the SHLAA would lead to an irrational and flawed process and therefore there is a need to revisit the reasonable alternatives, based on up-to-date evidence. An approach based upon directing more growth to the Primary Villages, and specifically Kentford and site K/02, would help to meet the objectives of the adopted Core Strategy (Vision 7, Spatial Objectives H1-3) and should therefore be considered as a reasonable alternative at this early plan-making stage.		
23542 - Moulton Parish Council (Mrs L Stone) [5222]	Comment	We would have liked to have seen an option promoting the majority of growth in the three major towns as they provide the most sustainable solution. As we are part of the Cambridge sub region it may have been possible to have a collaborative approach with East Cambridgeshire District Council over a new settlement centred on the A11/A14 junction.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22880 - Historic England (Mr Tom Gilbert-Wooldridge) [12636]	Comment	We do not have any specific alternative options, but it would be useful to explore the impact of different patterns of distribution, for example, higher levels of growth at Brandon.	Comments are noted. There is no evidence to suggest that a higher level of growth at Brandon can be provided at this time.  However, we will continue to work with Historic England as appropriate to address issues raised in the most sustainable manner, whilst providing for development that meets the identified housing needs of the district.	None.
22885 - Mrs Lucy Wadham [12642]	Comment	The availability of RAF Mildenhall site is the absolute priority when the council considers the implication of housing distribution in the area. The nature and extent of the contribution RAF Mildenhall can make to this is the fundamental pre-requisite to avoid needlessly over urbanising areas which cannot take further housing. The council should consider the potential to create an entirely new settlement somewhere else in this district before it endangers Newmarket which could fundamentally and damagingly alter its economic contribution to the area - a contribution which the council is fully aware of.	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23087 - CgMs (Miss Rachel Mottram) [12617]	Comment	Proposed extension to the Icklingham settlement boundary	The council supports small scale development within the boundaries of secondary villages and through the application of policy DM27 and DM29 in the joint Development Management Policies document. However, it would be contrary to the NPPF, the Core Strategy Settlement Hierarchy and the principles of sustainability to make allocations in these settlements.	None.
22842 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Comment	The council needs to consider RAF Mildenhall and either a new settlement in the region or a large extension to Red Lodge or Brandon or the above Mildenhall	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.  There is no evidence to suggest that a higher level of growth at Brandon can be provided at this time.	None.
23659 - Suffolk County Council (Mr James Cutting) [11903]	Comment	The District Council is best placed to manage conflicting priorities in respect of the planning system and the County Council's role is to identify relevant issues to assist the District in carrying out this task.  The following paragraphs identify issues relevant to the distribution options described and are set out in relation to relevant County Council service areas. The services listed are considered relevant to the overall distribution of housing. Other services, such as archaeology and public rights of way, are settlement and site-specific and so are considered in relation to the Site Allocations document.	Comments noted.	The Council will continue to work with Suffolk County Council in the preparation and the progression of the Single Issue Review.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23149 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Comment	RAF Mildenhall which will provide a further alternative for housing distribution	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	None.
22977 - Mr Simon Thompson [12662]	Comment	RAF Mildenhall which will provide a further alternative for housing distribution	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	None.
23148 - Jaynic Investments LLP [12621]	Comment	Jaynic Investments LLP would not wish to suggest any further distribution options at this time. However, they reserve the right to consider any further options put forward by either the District Council or other third parties, and submit further comments in respect of these options where necessary.	Noted.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23141 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	<p>a proposed alternative distribution option is proposed below. This option proposes a more even distribution of growth across the three Towns and higher growth in the least constrained Primary Villages with infrastructure capacity.</p> <p>FHDC should also consider allocating sites to deliver in excess of the final housing requirement to provide a buffer for lack of implementation, particularly where there is a reliance on large sites, which are slower to deliver than a number of smaller/medium size sites and have a longer lead in time due to infrastructure requirements.</p> <p>Brandon - Medium Growth Mildenhall - Medium Growth Newmarket - Medium to High Growth Lakenheath - Medium Growth Red Lodge - Medium to High Growth Beck Row - Low Growth West Row - Low Growth Exning - High Growth Kentford - High Growth</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23142 - Bedford House Stables (Lucia Cumani) [12674]	Comment	<p>The council needs to consider the implications should RAF Mildenhall be released. The availability of this site will assist with alternative housing distribution. The council should also consider the potential to create a new settlement elsewhere in the area. This is something South Cambridgeshire are doing.</p>	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22934 - Mr Justin Wadham [12641]	Comment	The availability of the RAF Mildenhall site is the absolute priority when the council considers the implication of housing distribution in the area. The nature and extent of the contribution of RAF Mildenhall can make to this is the fundamental prerequisite to avoid needlessly over urbanising area which cannot take further housing. The council should consider the potential to create an entirely new settlement somewhere else in this district before it endangers Newmarket which could fundamentally and damagingly alter its economic contribution to the area - a contribution which the council is fully aware of	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22940 - Pigeon Investment Management Ltd [7169]	Comment	<p>The options for growth should firstly reflect the settlement hierarchy. As this ranks the settlements in terms of their ability to accord with the aims of delivering sustainable development it should be the basis of the growth options, and would comply with national planning policy.</p> <p>The housing capacity of the settlements then needs to be assessed with regard to their individual constraints. In the highest tier in the settlement hierarchy Brandon is constrained by environmental restrictions and Newmarket is constrained by the need to protect the horse racing industry. This leaves Mildenhall as the most unconstrained location for growth of the towns. Brandon should receive low growth as a recognition of the current pending applications.</p> <p>Lakenheath can take growth commensurate with its size. Red Lodge is constrained by its infrastructure capacity such as primary and secondary schools. The consultation documents highlight constraints to development in Lakenheath however the constraints are principally to the south and east. To the north land is available and unconstrained for around 700 homes. So high growth is possible in Lakenheath if sites with a resolution to grant elsewhere are taken into account.</p> <p>The adopted Core Strategy proposed around 700 homes in the Primary Villages between 2010 and 2031. We see no reason for housing delivery to be below these levels. Kentford has been shown to be a sustainable location for development as a result of recent planning approvals. Exning is sustainable due to its proximity to Newmarket and has had 120 homes approved. Beck Road and West Row are sustainable due to their proximity to Mildenhall. There is no justification to reduce the level of housing to these settlements to levels below those set out in the 2010 Core Strategy prior to the judicial review. The sustainability credential of the settlements have not changed. West Row is close to Mildenhall and so can benefit from its sustainable range of services available there and development in West Row will provide support for these services. In this manner a cluster can be developed comprising Mildenhall, West Row and Beck Row with development supporting services</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>in each settlement as set out by paragraph 55. Due to the proximity to Mildenhall there is no justification for low growth options West Row particularly as it has not seen housing growth in recent years in line with that seen in settlements such as Exning, Kenford and Beck Row.</p> <p>We therefore suggest that the best scenario would be:            Brandon Low Growth            Mildenhall High Growth            Newmarket Medium Growth            Lakenheath High Growth            Red Lodge Medium Growth            Beck Row Medium Growth            West Row High Growth            Exning Medium Growth            Kentford High Growth</p>		
22985 - Newmarket Racecourses (Ms Amy Starkey ) [6377]	Comment	<p>Any potential development of RAF Mildenhall needs to be taken into account as it presents alternative options for development.</p> <p>Other options including the creation of a new settlement should be considered and has worked successfully for other local authorities with development requirements</p>	<p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.</p>	None.
23196 - Animal Health Trust [4678]	Comment	<p>Notwithstanding the response to Question 1 to the effect that the constraints to development in Forest Heath District are not so severe that a further 7,700 dwellings could or should not be accommodated in the Plan period, the constraints are nevertheless significant. AHT cannot identify any viable or suitable alternative to those proposed.</p>	Noted.	None.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22930 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Comment	<p>We would support the allocation of small scale development in secondary villages and small settlements.</p> <p>A development of 3-5 homes in these locations could help achieve the 'all homes' target required in Option 1 and is unlikely to have a significant negative impact on the infrastructure of the village while at the same time contributing to the sustainability of the village in the long term.</p>	<p>The council supports small scale development within the boundaries of secondary villages and through the application of policy DM27 and DM29 in the joint Development Management Policies document.</p> <p>However, it would be contrary to the NPPF, the Core Strategy Settlement Hierarchy and the principles of sustainability to make allocations in these settlements.</p>	None.
23051 - Racehorse Owners Association (Mr Richard Wayman) [12670]	Comment	<p>The future of RAF Mildenhall is a significant factor that must be considered.</p> <p>The council should also consider the potential to create a new settlement elsewhere in the district.</p>	<p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.</p>	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23164 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>The NPPF advocates the use of new settlements to meet housing needs (see paragraph 52). The NHG considers that the Council should give serious consideration to this as a way of meeting long term housing needs. This is method that districts such as South Cambridgeshire are utilising to address housing requirements. The NHG considers that this could be a sensible alternative to the four options suggested and encourages the Council to explore the potential for this within the District.</p> <p>The RAF Mildenhall site will provide an obvious option for such a proposal, should the Government decide to release the site for development. This does not mean that RAF Mildenhall is the only option and further options should be investigated.</p> <p>A sustainable alternative to high growth or even medium growth in Newmarket is essential to avoid any adverse impact on the health of the horse-racing industry. The Deloitte report prepared on behalf of the Council clearly identifies the value of the industry to the national economy and its vulnerability to even the perception of harm from increased development in Newmarket. The NHG considers that the high and medium growth options will pose a significant risk to the industry and welcomes the suggestion in the Deloitte report to introduce strict controls to development in Newmarket.</p>	<p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.</p>	None.
23599 - Herringswell Parish Council (Su Field) [5165]	Comment	<p>Sustainable options demonstrating an ability to plan for development across the district have been omitted in this consultation. The housing allocation appears to have been decided in a piece meal manner, with the emphasis for removing development from Newmarket been extensively encouraged by Newmarket pressure groups.</p> <p>We are surprised that these options seem to have been so far removed from the previous options agreed in the local plan 2010.</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	<p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23590 - John Gosden Racing LLP (Mr John Gosden) [12700]	Comment	<p>The council will need to consider the implications of the possible availability of the site of RAF Mildenhall. This will provide a further alternative for housing distribution.</p> <p>The council should also consider the potential to create a new settlement elsewhere in the district. This is something that South Cambridgeshire is doing to meet its housing need.</p>	<p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.</p>	None.
23579 - Rural Parish Alliance (Mr Bill Rampling) [12706]	Comment	<p>Representing the 15 parishes prevents us supporting any one option however, we do not believe ANY of the 4 options have supported the needs for development across the district.</p> <p>We are surprised that the 4 options seem so dissimilar from the choices supported and approved in CS7 which was quashed following the high court challenge, but only on a technicality.</p>	<p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
22998 - Mr Richard Ward [12658]	Comment	<p>The availability of RAF Mildenhall provides an additional option for evaluating need and distribution of housing.</p> <p>I am sure the distribution could be re considered rather than just looking at the areas that have been considered in the past and continue to be looked at for the future in the same way.</p> <p>Re evaluate the district to allow for need once the REAL need is known and accurate</p>	<p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.</p>	None.
23176 - R J Upton 1987 Settlement Trust [12681]	Comment	<p>Notwithstanding the response to Question 1 to the effect that the constraints to development in Forest Heath District are not so severe that a further 7,700 dwellings could or should not be accommodated in the Plan period, the constraints are nevertheless significant. The Landowner cannot identify any viable or suitable alternative to those proposed.</p>	Noted.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22978 - Ms Sara Beckett [6689]	Comment	RAF Mildenhall could be a viable and sustainable alternative which must be considered for housing need (once that is truly known) and allows an alternative for distribution within the District should it be required.	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.	None.
22729 - Mr Sebastian Gosden [12618]	Comment	<p>Brandon (enjoying the benefits of the A11 expansion) is a vastly more suitable candidate for the 1,500 houses absurdly allocated to Newmarket. Thousands of jobs are not immediately threatened by significant housebuilding in Brandon, whereas report after report has shown that they are threatened in Newmarket by this disastrous Core Strategy.</p> <p>The consistent rejection of the Hatchfield Farm applications by the Town Council, all Newmarket's representative on the District Council, and even the Secretary of State for Communities and Local Government has shown this. Why will the planning officer responsible for drawing up this document not listen?</p> <p>That they have not updated the Core Strategy to reflect this (after their initial conclusions were thrown out by the High Court) is outrageous.</p>	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.	Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.
23072 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	LPC observe with concern that the NPPF encourages the re-use of brownfield sites which LPC supports. There is only one brownfield site (L29) in Lakenheath. LPC view the Council's failure to comply with the NPPF requirement to direct housing growth to brownfield sites as unacceptable and contrary to the NPPF.	Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement and available and suitable sites.	None.

**Representations**

**Nature**

**Summary of Main Issue/Change to Plan**

**Council's Assessment**

**Action**

23451 - Barton Mills Parish Council (Mr J Bercovici) [5059]

Comment

Question 4/5: We believe that development should be concentrated in the three market towns which are the most sustainable locations with employment and service provision nearby, thus reducing the need for travel on inadequate rural roads. Although recognising the environmental constraints in Brandon, we think it may be possible to site more development there than currently proposed by making full use of brown field sites.

Newmarket has the best services and is nearer to Cambridge and is therefore the most sustainable location and as much development as possible should take place there.

We think that further development should be avoided in Red Lodge until community provision has improved (eg a second school) and the community has been allowed to have time to develop as a community. High and very high growth is not appropriate here at present.

We would therefore prefer an option with higher growth than shown in Newmarket and Brandon and low growth in Red Lodge.

We would rank the distribution scenarios listed in the order 1, 4, 2, 3.

Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.

Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.

22922 - Hopkins Homes Ltd (Mr Chris Smith) [7694]

Object

Comments/Objection to Question 5.

See attached Document.

Comments/Objection to Question 5.

See attached Document.

The council supports small scale development within the boundaries of secondary villages and through the application of policy DM27 and DM29 in the joint Development Management Policies document. However, it would be contrary to the NPPF, the Core Strategy Settlement Hierarchy and the principles of sustainability to make allocations in these settlements.

None.

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***Forest Heath draft Infrastructure Delivery Plan (supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan)***

*Public Participation Report*

[About this document](#)

[About this document](#)

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***Representations***

***Nature Summary of Main Issue/Change to Plan***

***Council's Assessment***

***Action***

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***About this document***

*About this document*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23243 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>The IDP is a supporting document to the SIR based on the IECA (2009) and LDF Transport Impacts document (2009). These documents are over 6 years old and are considered out of date.</p> <p>There does not appear to have been any recent or renewed traffic surveys undertaken to advise the IDP. The NHG is therefore concerned that the transport evidence undertaken within the IDP has not been carried out with the benefit of up-to-date survey information and cannot therefore be relied upon.</p> <p><i>The Draft IDP is largely based on the IECA (2009) and the LDF Traffic Impacts document (2009); with supporting data using the 2001 Census, which is now out of date; and importantly traffic survey data that is now at least 6 years old compared with the industry standard 3 years.</i></p> <p><i>The IECA (2009) document:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>States that qualitative rather than quantitative analysis of capacity issues was used - Page 46;</i></li> <li><input type="checkbox"/> <i>Identifies road network congestion as a key infrastructure pressure - page 49;</i></li> <li><input type="checkbox"/> <i>States that medium to high levels of growth may be prevented without investment - Page 50;</i></li> <li><input type="checkbox"/> <i>Identifies more horse / vehicle conflict arising from cumulative development - Page 98;</i></li> <li><input type="checkbox"/> <i>It acknowledges: Hypothesis only of traffic impact on the Horse Racing Industry (HRI) and highlights the need for further consideration - Page 123; and There is also reference to 'limited evidence'.</i></li> </ul> <p><i>Based on the above it is concluded that the IECA and resulting Draft IDP do not provide the transport evidence base for SIR options in Newmarket at the present time.</i></p> <p><i>An up-to-date informed evidence base would require at least the following surveys to be undertaken:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>Examine baseline traffic conditions including Automatic Number Plate Recognition (ANPR) surveys throughout Newmarket;</i></li> <li><input type="checkbox"/> <i>Examine baseline safety conditions at all Horse Crossings within Newmarket, identified from video data;</i></li> <li><input type="checkbox"/> <i>Review highway signing throughout Newmarket and</i></li> </ul>	Comments noted.	<p>The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations (including with transport and highways), and an update of the Water Cycle Study, and responses to the Issues and Options SIR and SALP consultations.</p>



**Representations****Nature****Summary of Main Issue/Change to Plan****Council's Assessment****Action**

consider improvement options;2

- Identify modelling techniques to best quantify impacts (e.g. microsimulation);
- Undertake traffic modelling for 'do nothing' and the 4 SIR options;
- Quantify the impact of the 4 options;
- Consider measures to mitigate the impact of each option - including costs, funding and timescales;
- Evaluate the existing bus and rail service availability / integration in comparison with demand;
- Consider improved bus and rail services, infrastructure and integration to meet demand of each of the 4 options;
- Examine opportunities to encourage a shift from car mode to walking and cycling;
- Review existing routes / crossings, and cycle parking location and provision; and
- Consider potential new and improved cycle and pedestrian infrastructure to encourage a mode shift;

Detailed evidence needs to be provided to demonstrate the implications of the further development for the capacities of all other infrastructure requirements with appropriate investigation of the mitigation measures required and the costs associated with this. Only then can the Council ensure that the future development of the District does not undermine existing infrastructure provision.

22913 - West Suffolk Councils  
(Mr Jonathan Geall - WSC  
Housing Development and  
Partnership) [12654]

Comment

Clear, concise and presented in a sound and methodical style. Each category described is supported by robust evidence and is used to examine the sustainability of developments in market towns, key service centres and primary villages.

Comments noted.

23095 - Lakenheath Parish  
Council (Ms C Shimmon) [12422]

Comment

Page 4  
There is confusion on the status of Forest Heath as a CIL charging authority and needs resolution.

Comment noted.

**Representations****Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action****2. Policy background****2.1-2.3**

23096 - Lakenheath Parish Council (Ms C Shimmon) [12422]

Comment

See comments below about the inappropriate treatment of Lakenheath as a Key Service Centre and the uncertainty affecting Lakenheath as a result of RAF/USAF changes in operations at Mildenhall and Lakenheath. All allocations should be deferred pending the outcome of US and RAF operations at these locations. The point to make is that the uncertainty as to the use of Mildenhall could mean it becomes a large brownfield site suitable for housing within the plan period and the shift of operations to RAK Lakenheath will mean increased noise and safety considerations that impact on grown areas.

Comments noted.

It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.

**3. Evidence background****3.5-3.9**

23224 - Newmarket Horsemen's Group (NHG) [11392]

Comment

3.5 The Council states "It is essential that the SIR is underpinned by a robust evidence base in terms of what infrastructure is currently available and what will be required to deliver the revised growth strategy." However, as outlined above the evidence base is considered to be out of date.

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**3.12-3.14**

23245 - Newmarket Horsemen's Group (NHG) [11392]

Comment

3.14 It is unclear how infrastructure requirements will be brought to the Council's attention when the survey work to identify the constraints is not up-to-date or available in some cases.

Comment noted.

The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations (including with transport and highways), and an update of the Water Cycle Study, and responses to the Issues and Options SIR and SALP consultations.

**Representations****Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action****4. Infrastructure requirements and constraints****4.1-4.3**

22792 - Historic England (Mr Tom Gilbert-Wooldridge) [12636] Object

The draft plan does not contain much discussion of the historic environment or heritage assets under infrastructure requirements and constraints in Section 4. The tables in Section 6 contain some reference to the heritage of specific settlements, but this does not appear to inform consideration of growth options and constraints. Having attended the workshop earlier in 2015, we would like to see greater consideration of the historic environment and the potential impact of growth on heritage assets.

*We would like to see greater consideration of the historic environment and the potential impact of growth on heritage assets.*

Comments noted.

The historic environment and heritage assets have been considered on a site by site basis and have informed selection of the preferred options for site allocations. Reference will be made, where relevant, in the next iteration of the IDP.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22830 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Support	<p>Green infrastructure can support and enhance the environment and the health and well-being of residents. It helps to protect and restore naturally functioning ecosystems and provide a framework for development. Its key functions are:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Enriching habitats and decreasing fragmentation</li> <li><input type="checkbox"/> Maintaining natural landscape processes</li> <li><input type="checkbox"/> Protecting historic landscapes, archaeological and built heritage assets</li> <li><input type="checkbox"/> Helping mitigation of, and adaptation to, the effects of climate change</li> <li><input type="checkbox"/> Flood alleviation</li> <li><input type="checkbox"/> Improving air quality and attenuating noise</li> <li><input type="checkbox"/> Improving quality of life, health and well-being</li> <li><input type="checkbox"/> Providing opportunity for recreation and access</li> <li><input type="checkbox"/> Providing sustainable transport routes</li> <li><input type="checkbox"/> Local food production</li> <li><input type="checkbox"/> Contributing to a sense of place</li> </ul> <p>Since many of the settlements within the Forest Heath district have European and nationally designated sites nearby, from an ecological perspective it is important that each settlement contains sufficient greenspace to support local residents. By providing this local green space and ensuring there are areas nearby for activities such as dog walking, activity is diverted away from designated sites in the vicinity, which are likely to be put under increasing pressure due to the proposed housing provision within the district. In particular, settlements close to Breckland Special Protection Area (SPA) such as Lakenheath, which has no publicly accessible greenspace available that is not designated (Maidscross Hill is both a Site of Special Scientific Interest (SSSI) and a publicly accessible Local Nature Reserve), are particularly in need of non-designated green space to lessen recreational pressure on Breckland SPA. Note in the case of Lakenheath we are also concerned about the pressure on Maidscross Hill SSSI which highlights that SSSIs, where they are accessible to the public, can be damaged by high levels of recreation if there is not sufficient alternative greenspace available.</p>	Comments noted.	The council will continue to work closely with Natural England in progressing the SIR and SALP.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>4.4-4.12</i>				
23253 - Norfolk County Council (Ms Laura Waters) [11365]	Comment	4.6 and 4.29 of the draft plan, Norfolk County Council are working closely with adjoining authorities on the highways and education infrastructure associated with the proposed development at Brandon. For information please find attached Norfolk County Councils response to the 1,650 dwellings application which was put together with Suffolk County Council.	Comments noted.	
23099 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	Await transport assessment.  Lakenheath railway station is 3 miles from the centre of the village.  Poor bus service.  Cycleways impractical for employment or shopping given travel distances.	Response noted.	The IDP is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations (including with transport and highways), and an update of the Water Cycle Study, and responses to the Issues and Options SIR and SALP consultations.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23810 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>TRANSPORT</p> <p>The consultation document proposes growth of between 370 and 385 dwellings a year over 20 years, totalling 7000 to 7700 dwellings between 2011 and 2031. The AECOM report prepared to support the 2010 Core Strategy examined the broad locations and allocations put forward in the Spatial Options housing provisions at that time, and assessed their possible transport facilities and infrastructure requirements. It is noted that there have been some changes to the location of committed growth since 2011 following the revocation of CS7. The District is currently considering four scenarios;</p> <ol style="list-style-type: none"> <li>1. Focus on Mildenhall, Newmarket and Lakenheath</li> <li>2. Focus on Lakenheath, Red Lodge, with medium growth at Mildenhall and Newmarket</li> <li>3. Focus on Red Lodge, Lakenheath and Mildenhall with lower growth in Newmarket</li> <li>4. Focus on Mildenhall, Newmarket and Red Lodge with increased growth in primary villages</li> </ol> <p>The Suffolk County Council Local Transport Plan identifies the importance of sustainable growth in managing the impact on the highway network. Development is considered sustainable where housing is provided close to areas of employment and where key infrastructure and facilities are provided. This provides the greatest opportunity for the use of sustainable modes of transport, thereby minimising the increase in traffic on the local network. The location and concentration of growth within the identified towns together with the level and location of employment growth are key factors in assessing the impact of development. Suffolk County Council has therefore committed to undertake further work with the District Council to ensure that the issues for the different areas of growth are understood and identify areas where further transport assessment is required to build on the work undertaken in 2009.</p> <p>With regards to the locations of growth identified in the options assessment to date the following points are raised for consideration.</p>	Comments and advice noted.	The IDP is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations (including with transport and highways), and an update of the Water Cycle Study, and responses to the Issues and Options SIR and SALP consultations.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Newmarket was identified as one of the key areas of growth in the 2010 Core Strategy. The town is the home to an internationally significant horse racing industry, contributing a unique complexity to movements on the highway network. The County Council is part of the Newmarket Vision Transport Delivery Group that has worked to develop infrastructure improvements across the town to address concerns about safety from the horse racing industry. This work has informed requests for infrastructure improvements associated with the planning process and will continue to form the basis of future section 106 contribution requirements. The key issues that need to be considered for growth in Newmarket are the impact of additional traffic on horse movements and the horse movements on other highway movements; the junction of the A14 junction 37 and the local highway network has been identified as requiring improvement; the impact of growth on the Air Quality Management Area along the High St and the assessment of increased movements through the town from the surrounding area, notably Exning and Kentford.</p>		
		<p>Mildenhall has some internal constraints on capacity that may impact on the level of growth within the town, the location of this growth will be key to assessing this impact. There has been a long term aspiration for a relief road for the town, it is noted that there are significant environmental impacts associated with the routes previously considered, in addition the level of growth is unlikely to be of the scale to deliver the relief road through development contributions.</p>		
		<p>More evidence would be needed to support the District Council's view that there are currently congestion issues associated with Beck Row.</p>		
		<p>For Brandon it is not anticipated that the current proposed level of growth will be significant. The Brandon relief road is not required to deliver development of the scale proposed in this document, but to address current transport issues particularly associated with the level crossing. The County Council will also be undertaking a review of the impact of the recent A11 improvements on traffic movements</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		through the town.  It should be noted that funding for improvements required to deliver growth should wherever possible be delivered through the development.		
22733 - West Row Action Group (Mr John Smith) [12494]	Support	Any development in West Row in excess of Prime Village would require major road upgrades as far as the A11.	Response noted.	The IDP is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations (including with transport and highways), and an update of the Water Cycle Study, and responses to the Issues and Options SIR and SALP consultations.



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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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4.13-4.28

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23241 - Environment Agency (Elizabeth Mugova) [12393]	Comment	<p>There are opportunities for developers and stakeholders to contribute to the existing river restoration projects along the river Little Ouse and the river Lark. To date, several projects have been delivered along both rivers, including low-cost in-channel improvements and lateral connectivity to the floodplain. Additionally, opportunities to improve fish and eel passage should be explored. Such projects help towards achieving WFD objectives and ensuring no deterioration to the waterbodies.</p> <p>Any green and blue infrastructure should be incorporated into the existing natural environment to improve and extend natural functioning wildlife corridors to facilitate the movement of species; this will also contribute towards the effects of climate change by creating buffer zones adjacent to existing designated sites and providing robust networks for species dispersal.</p> <p>However, the additional infrastructure will result in an increased level of animal injuries and/or fatalities through collisions with traffic. Therefore, opportunities for under passes and green bridges, linking to existing (or new) green and/or blue corridors, should be incorporated into the infrastructure plan to reduce the likelihood of road traffic accidents involving animals and reducing barriers to species dispersal.</p> <p><b>Flood Risk</b></p> <p>The Plan should consider whether any new flood defences may need to be constructed now or in the future and establish whether developers are able to invest.</p> <p><b>Wastewater Quality</b></p> <p>Most AWS STWs have plenty of permitted capacity to accept the proposed levels of growth. Improvement schemes are proposed for completion by 2020 at Tuddenham and Lakenheath STWs in order to prevent deterioration in river WFD status as a result of growth proposed at those locations.</p> <p><b>Water Resources</b></p> <p>Point 4.19 of the draft infrastructure delivery plan states that: "Additional water and wastewater infrastructure capacity required to accommodate the proposed growth whilst protecting the water environment and responding to climate change, has been identified". We strongly encourage the Council to approach Anglian Water Services (AWS) to discuss</p>	Detailed comments noted.	The council will continue to work closely with the Environment Agency when progressing the IDP. The council has commissioned an update of the Water Cycle Study, and will continue to engage with all of the main service and infrastructure providers (including Anglian Water Services). The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		about phasing the proposed development and how AWS will ensure supply to future development. We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.		
23240 - Anglian Water (Ms Sue Bull) [11226]	Comment	Thank you for the opportunity to comment on this document.  We are satisfied that sections 4.19 to 4.25 are an accurate reflection of the circumstances.  The additional comments on scale of growth and potential impact on infrastructure included on pages 26,29,31,33,36,40,42,44,46, and referred to as 'Utilities - Anglian Water note 2' are as we advised in recent consultation.	Comments noted.	
23100 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	4.15 The village does not cope, at the current time, with heavy rainfall. Eriswell Road has no adequate drainage in place and other trouble spots are Mill Road at its junction with the High Street; Wings Road; Back Street; Mutford Green at its junction with Station Road; Quayside Court at its junction with Station Road and Highlands. There are no doubt other areas but, with the exception of Back Street, the roads mentioned are the main thoroughfares or bus routes.	Comments noted.	The council will continue to work closely with the Environment Agency and Anglian Water Services when progressing the IDP. The council has commissioned an update of the Water Cycle Study, and will continue to engage with all of the main service and infrastructure providers. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue.
22914 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Comment	Sub heading Energy (4.27): UK Power Networks have not identified any future capacity issues at present. Should there be mention, in planning terms, of the use of renewable energy such as solar farms, wind to supply energy to more rural settlements?	Response noted.	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23246 - Newmarket Horsemen's Group (NHG) [11392]	Comment	4.15-4.25 The NHG has raised concerns to the both the Sustainability Appraisals and the HRAs for the Single Issue Review and the Sites Allocations Documents. These concerns influence the assessment of infrastructure constraints in terms of water resources. As set out in the responses to these other documents insufficient evidence has been provided to either justify the assessment of impacts or in some cases identify the impacts. As such the infrastructure constraints of Water Resources cannot possibly be understood at this stage.	Response noted.	The IDP is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers including the Environment Agency and Anglian Water Services. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations (including with transport and highways), an update of the Water Cycle Study, and responses to the Issues and Options SIR and SALP consultations.
23103 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	4.15 The village doesn't cope, now, with heavy rainfall. Eriswell Road has inadequate drainage in place. Other trouble spots are Mill Road at its junction with the High Street; Wings Road; Back Street; Mutford Green at its junction with Station Road; Quayside Court at its junction with Station Road and Highlands. There are other areas but, with the exception of Back Street, the roads mentioned are the main thoroughfares or bus routes.  Suds systems normally incorporate swales for drainage which become clogged and smelly particularly in Autumn with leaf fall and can cause bird strike which could create problems for aircraft.	Comments noted.	The IDP is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers including the Environment Agency and Anglian Water Services. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations (including with transport and highways), an update of the Water Cycle Study, and responses to the Issues and Options SIR and SALP consultations.
<i>4.29-4.44</i>				
23248 - Newmarket Horsemen's Group (NHG) [11392]	Comment	4.39 There is no evidence referred to that confirms the existing capacity of libraries has been assessed and reviewed in light of current budget constraints and future demand. As such the infrastructure constraints of library provision cannot possibly be understood at this stage.	Comments noted.	The council continues to engage with the main service and infrastructure providers including Suffolk County Council. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations and responses to the Issues and Options SIR and SALP consultations.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23254 - Norfolk County Council (Ms Laura Waters) [11365]	Comment	Points 4.6 and 4.29 of the draft plan, Norfolk County Council are working closely with adjoining authorities on the highways and education infrastructure associated with the proposed development at Brandon. For information please find attached Norfolk County Councils response to the 1,650 dwellings application which was put together with Suffolk County Council.	Comment noted.	The council continues to engage with the main service and infrastructure providers including Suffolk County Council, and with adjoining councils where relevant. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations and responses to the Issues and Options SIR and SALP consultations.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23808 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p><b>FIRE AND RESCUE</b></p> <p>It is important to consider the overall scale and distribution of housing growth in relation to the ability of the Suffolk Fire and Rescue Service to provide services to new and existing development.</p> <p>The Suffolk Fire and Rescue Service do not foresee any problems arising from the four distribution options proposed, or any need for additional service provision. This is based on existing service conditions, and development will be monitored in case service requirements change during the plan period.</p> <p>Individual sites will need to ensure suitable access for fire appliances and provision of water supplies (fire hydrants). Automated sprinkler systems are encouraged, but cannot automatically be required.</p> <p><b>HEALTH, WELLBEING AND SOCIAL CARE</b></p> <p>In considering the distribution of housing growth, the District Council should consider the specific needs of an ageing population. Spatial choices might be influenced by the household requirements of residents, the accessibility of services and the availability of public transport.</p> <p>Given that the population is ageing, this increases the benefits of ensuring that housing is well related to key services, such as retail, public transport and health provision. Equally, housing in rural areas may be less attractive to people needing to access employment in the larger settlements.</p> <p>The County Council would be pleased to help the District Consider the housing needs of different groups in the community; particularly in terms of assessment of need for housing with care, meeting the requirement set out in paragraph 162 of the National Planning Policy Framework.</p> <p>Directing development to locations with good access to sports and recreation provision (including a strong public rights of way network) will help deliver better health outcomes. Therefore, the District Council</p>	Comments noted.	The council continues to engage with the main service and infrastructure providers including Suffolk County Council. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations and responses to the Issues and Options SIR and SALP consultations.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		should consider how the distribution of housing might enable better access to sport and recreational facilities, and healthy modes of travel, as a means of improving health outcomes.		
23101 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	<p>Struggling doctors surgery.</p> <p>Reduced policing.</p> <p>The need for infrastructure to be in place prior to development to avoid a repeat of the Red Lodge chaos.</p> <p>Are we assured that the library can be retained.</p>	Comments noted.	The council continues to engage with the main service and infrastructure providers including Suffolk County Council. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations and responses to the Issues and Options SIR and SALP consultations. Infrastructure requirements are being assessed for the level and locations of growth proposed. Improvements will be linked to the level and timing of development proposed.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23807 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>EDUCATION</p> <p>The scale of growth required will require significant additional education provision. Whilst the County Council is able to access some central government funding towards additional school places, it is an established planning principle that development should fund the infrastructure needed to mitigate its impacts.</p> <p>This places a cost on development. The District Council should consider whether, through allocating housing development to locations where school places can be provided more cost-effectively, there is potential for reducing development costs, increasing the likelihood of housing delivery and maximising the amount of affordable housing which can be required from sites.</p> <p>By providing the information below, the County Council seeks to highlight issues relevant to different patterns of growth. This relates to information included in the draft Infrastructure Delivery Plans and options for the overall level of housing growth.</p> <p>EARLY EDUCATION</p> <p>The County Council has a statutory duty to facilitate the childcare market and to ensure the provision of sufficient childcare which is responsive to parents' needs. At present this equates to a need to ensure that parents can access 15 hours per week of free early education for all 3 and 4 year olds. Eligible 2 year olds can also access the same level of provision.</p> <p>The Government has also announced that it will legislate to double free childcare available for all working parents of 3 and 4 year olds to 30 hours a week. It is intended that this will come into operation from 2016.</p> <p>Based on current statutory arrangements, it is estimated that every hundred new dwellings will create a demand for ten additional early education places.</p> <p>Given the proposed changes in statutory</p>	Comments and advice noted.	The council continues to engage with the main service and infrastructure providers including Suffolk County Council. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations and responses to the Issues and Options SIR and SALP consultations.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>arrangements, it should be assumed that no capacity is available from existing providers. This can be reassessed as the Local Plan moves to the next consultation stage.</p> <p>PRIMARY EDUCATION</p> <p>Each Market Town, Key Service Centre and Primary Village is served by one or more primary schools. In the case of Kentford, the village is served by Moulton Primary School outside the parish, and some children attend Kennett Primary School just over the border in Cambridgeshire.</p> <p>The following table provides a commentary on the different distribution options, and potential options for mitigating the impact on schools.</p> <p>An iterative approach to site choices and the implications for school place provision needs to be taken, and the County Council would be pleased to facilitate this approach as the District considers its preferred options.</p> <p>Please note that the table of Primary School provision options is based on the January 2015 pupil forecast and housing as at March 2014. This means that the table does not take into account applications submitted or permitted since March 2014, which may affect the District's decision as to where further housing growth is to be distributed.</p> <p>SECONDARY EDUCATION</p> <p>Forest Heath is served by Mildenhall College, Newmarket College and IES Breckland (a free school). Each school currently has spare capacity, although Mildenhall College is expected to exceed its current capacity by the end of the forecast period - 2019.</p> <p>Under each of the development scenarios proposed, Newmarket College could respond to the housing growth on its current site. In the early part of the plan period, growth could be absorbed without a need to expand the school's physical capacity. After capacity</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>is used up, developer contributions would be required to expand the school buildings.</p> <p>Different options exist for managing growth in the Mildenhall College catchment. Mildenhall College itself may be able to expand to absorb some growth, particularly given opportunities arising from the Mildenhall Hub project. Some of the pupils arising from the housing growth could be absorbed by the Free School at IES Breckland, and some pupils (particularly those from Red Lodge) could head south to Newmarket College.</p> <p>But the number of pupils arising in the Mildenhall Catchment is potentially sufficient to justify the opening of a new secondary school. This is perhaps the most sustainable option in that it provides greater flexibility for future Local Plans.</p> <p>The need for this school should be discussed over the coming months. If it is needed, the location should be based upon the distribution of housing and minimising the need for pupils to travel. On this basis, and the potential development scenarios outlined as part of the Single Issue Review, the optimal location could be at either Mildenhall, Lakenheath or Red Lodge.</p> <p>Further exploration and investigation of this topic will be needed as the Plan advances to the next consultation stage.</p> <p>PLEASE SEE TABLES ON PAGES 7 AND 9 OF THE ATTACHED DOCUMENTS</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22915 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Comment	Sub Heading Education (4.29): It may be useful to highlight the cumulative impact of separate developments on education infrastructure. We believe all developments would best be considered cumulatively rather than on a site-by-site basis. Across the district, we have seen a number of reasonably sized developments with little or no additional primary school, and certainly no additional, secondary school development in response to the increased capacity arising from the developments taken together. Regarding the Queen's Speech announcement regarding the introduction of additional free hours of childcare for 3 and 4 year olds - where will these early years' placements be provided?	Comments noted.	The council continues to engage with the main service and infrastructure providers including Suffolk County Council. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations and responses to the Issues and Options SIR and SALP consultations. Infrastructure requirements are being assessed for the level and locations of growth proposed. Improvements will be linked to the level and timing of development proposed.
23247 - Newmarket Horsemen's Group (NHG) [11392]	Comment	4.32 Despite references to meetings with healthcare providers there is no evidence provided regarding the findings of these conversations. There is no up-to-date assessment of existing capacity of facilities or the potential for expansion to address future needs. The Sustainability Appraisal for the site allocations document advises that there is limited data on this topic (see Table 4.2). As such the infrastructure constraints of healthcare provision cannot possibly be understood at this stage.	Comment noted.	The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers including healthcare providers. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, and responses to the Issues and Options SIR and SALP consultations.
22734 - West Row Action Group (Mr John Smith) [12494]	Object	Most of the community infrastructure for our area is Mildenhall based, because of the poor transport links between West Row and Mildenhall this limits the amount of development that could be considered.  <i>There would have to be large investment in bringing community infrastructure to West Row before development rather than assuming West Row shares that in Mildenhall.</i>	Comment noted.	West Row is a Primary Village and it is to be expected that some community infrastructure will only be found in larger settlements. Infrastructure requirements are being assessed for the level and locations of growth proposed. Improvements will be linked to the level and timing of development proposed.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>4.45-4.47</i>				
23809 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>NATURAL ENVIRONMENT</p> <p>The Habitats Regulations Assessment Screening exercise which accompanies the consultation documents goes into significant detail in assessing the impacts of housing development on species and habitats designated under European legislation. This now enables consideration of the avoidance of impacts on said designations. Further work can be carried out to consider opportunities for mitigation of likely significant impacts on European designations. The development of a strategic approach to green infrastructure and ecological mitigation could, if implemented, assist in delivering housing and economic growth, with a planned and programmed approach to managing the cumulative pressures on habitats and species.</p> <p>The County Council is already working with authorities in East Suffolk to consider how to manage pressures on European sites. The same assistance can be provided to Forest Heath District Council (and neighbouring authorities) if helpful. In particular, improvements to the County Council's Rights of Way Network could be useful in managing recreational pressures.</p>	Comments noted.	The council will continue to work with Suffolk County Council. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, further research and studies, and responses to the Issues and Options SIR and SALP consultations.
22735 - West Row Action Group (Mr John Smith) [12494]	Object	<p>Many of the green areas and paths that have always been part of our village are now part of sites being considered for development .</p> <p><i>Identify what is considered common or habitually used paths rather than just referring to what is on the definitive map .</i></p>	Comment noted.	Whilst it is not possible to identify common or habitually used paths the council considers the enhancement and provision of green infrastructure is very important, and where relevant this is referred to in the site allocation policies.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5. Viability and infrastructure delivery</b>				
<b>5.1-5.6</b>				
23249 - Newmarket Horsemen's Group (NHG) [11392]	Comment	5.5 From the 2009 IECA the IDP identifies for Newmarket the Road Network and Public Transport as 'Fundamental' which is described as Infrastructure required to overcome development showstoppers; without it development could not occur; and must be provided up-front to support development. The IDP considers a number of key constraints for Newmarket including the congested A14 / A142 Junction; A14 and Railway physical boundaries; Impact on junction capacity in Newmarket; and Impact on horse movements. However, no up-front solutions have been identified to account for the increased growth figures.	Comment noted.	The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers, including those responsible for transport and highways. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, and responses to the Issues and Options SIR and SALP consultations.

**Representations****Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action****6. Infrastructure and service constraints, issues and priorities****6.1-6.3**23811 - Suffolk County Council  
(Mr James Cutting) [11903]

Comment

HORSERACING AT NEWMARKET AND ITS  
HINTERLAND

Comments noted.

The council will continue to work closely with the community, the Town Council, the Horse Racing Industry, Suffolk County Council and other stakeholders through the Newmarket Vision and Neighbourhood Plan.

The Local Transport Plan and Forest Heath Core Strategy both recognise the significance of horse racing at Newmarket. Reports by SQW (2014) and Deloitte (2015) demonstrate the economic importance of the industry, and the way in which the industry operates as 'an ecosystem', with different component parts.

The County Council is committed to working with local partners to consider ways in which Newmarket can grow in a balanced way; protecting and promoting Newmarket's status as an international horse racing centre of excellence, whilst also meeting the needs of all residents and other economic sectors.

The County Council would be pleased to continue participating actively through the Newmarket Vision, working with the District Council, Town Council, Horseracing Industry and other stakeholders to achieve the best possible outcomes for the Town.

23250 - Newmarket Horsemen's  
Group (NHG) [11392]

Comment

6.3 The Council has not published the results and findings of consultation with infrastructure and service providers in 2015. As such, it is impossible to comment on the appropriateness/validity of the conclusions drawn on such matters.

Comment noted.

The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers, including those responsible for transport and highways. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, and responses to the Issues and Options SIR and SALP consultations.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22831 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Support	In the existing infrastructure and opportunity tables it is clear that, although several settlements have sporting and indoor leisure facilities, there is little actual non designated greenspace. This is particularly apparent in Lakenheath, Kentford, West Row and Red Lodge. It is important to consider amenity grassland areas such as parks separately from defined facilities such as sporting facilities, allotments and play areas; many people simply need accessible green space to relax, walk and exercise their dogs, away from play areas and sporting facilities. We advise that the provision of accessible natural green space should be a priority for your authority, given how important this is to achieving a sense of place, for the health and wellbeing of residents and for the ecological reasons outlined above. There is also a need for defined walking and cycling routes in the district and we are pleased that improvements are already proposed for the Brandon and Newmarket areas. We hope this project will be extended to other areas in the district.	Comments and advice noted.	The council notes this advice and, where appropriate, has included in housing site allocation policies requirements for recreational and natural greenspace, green infrastructure, links between greenspaces and/or enhancements (see for example, Policy L2 Focus of Growth: North Lakenheath, in the SALP Preferred Options document).
<i>Lakenheath (key service centre)</i>				
23118 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	See comments above about the inappropriate treatment of Lakenheath as a Key Service Centre and the uncertainty affecting Lakenheath as a result of RAF/USAF changes in operations at Mildenhall and Lakenheath. All allocations should be deferred pending the outcome of US and RAF operations at these locations. The point to made is that the uncertainty as to the use of Mildenhall could mean it becomes large brownfield site suitable for housing within the plan period and the shift of operations to RAK Lakenheath will mean increased noise and safety considerations that impact on grown areas.	Response noted.	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site (or any consequential infrastructure requirements) in the Core Strategy Single Issue Review, the Site Allocation Local Plan or the Infrastructure Delivery Plan. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.
23108 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	Northbound junction from B1112 to A11 has been eliminated by the improvement works and requires car travel to go to Thetford via Brandon so the information stating improvements to links is incorrect.	Response noted.	Noted - the next draft of the IDP will be updated to reflect any changes and/or inaccuracies.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23112 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	Green infrastructure There is a risk that these valuable resources could be undermined by inappropriate development affecting biodiversity resources as identified by Natural England. Forest Heath has always been portrayed as a "tourist" destination and Lakenheath, apart from lying in a unique environment between the Fen and Brecklands SPA/SAC, has the nationally renowned RSPB site, but, with the potential destruction of the natural wildlife corridor to the north/west of the village.	Response noted.	Environmental constraints have been fully considered in the plan process.
23107 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	No nursing home - closed down Dec 2013 Needs to be corrected Royal British Legion Hall annexed to the Memorial hall and due to dwindling numbers meet in private residents No supermarket for weekly shop only a run-down stop gap Co-op One pub and a Chinese restaurant licensed for a public bar	Response noted.	Noted - the next draft of the IDP will be updated to reflect any changes and/or inaccuracies.
23111 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	Transport capacity must be informed by SCC study referred to above.  The reference to other constraints fails re RAF/USAF operations must be updated to reflect the significant degree of uncertainty over the scale of changes and shifts in operations. This is explained in more detail in submissions to the SIR/Allocations consultations.	Comments noted.	The council is undertaking research and working with the appropriate service providers and agencies to ensure the level and distribution of growth can be supported. It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site (or any consequential infrastructure requirements) in the Core Strategy Single Issue Review, the Site Allocation Local Plan or the Infrastructure Delivery Plan. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.
23105 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	Removal of Lakenheath as a KSC due to insufficient services. Some services could close which would effect an element of the community. As above.	Comments noted.	Lakenheath is designated as a Key Service Centre in the adopted Forest Heath Core Strategy, and the level of growth proposed in the SIR is appropriate to its capacity as a KSC.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Newmarket (Market Town)</i>				
23251 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>Existing Infrastructure: There is no published assessment (or reference to any such assessment) that clarifies the capacity of existing facilities or the potential for expansion of such facilities to meet future demands.</p> <p>Physical constraints: Reference is made to the A14 Junction capacity and congestion, the Impact on Horse Movements and the HRI / horse movement constraints on Newmarket. However, there is no evidence that the Council has undertaken a recent assessment of existing movements and the potential impact any additional vehicle movements may have on the quoted constraints.</p> <p>The NHG considers that the economic benefit of protecting the horse-racing industry should be referred to in this table. The importance of protecting this industry is supporting by the findings of the Deloitte Report.</p> <p>Opportunity Areas: Central area housing is identified in the range of 360 - 630 houses; and North-East Newmarket around Hatchfield Farm is identified as being in the range 1200 - 2100 houses.</p> <p>This equates to a total of 1560 - 2730 houses which is higher than the high growth figure of c1500 set out in the SIR. Clarification from the Council is required as there appears to be inconsistencies between the documents.</p> <p>New homes: The table lacks any assessment of health, highways, transport, community facilities, sport/recreation, leisure or water resources for the various housing numbers appraised. The NHG considers these to be worrying omissions from this document.</p>	Comments noted.	The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers, including those responsible for transport and highways. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, and responses to the Issues and Options SIR and SALP consultations.
<i>West Row (primary village)</i>				
22736 - West Row Action Group (Mr John Smith) [12494]	Support	The coalescence with Mildenhall is what concerns us . As a rural community we are distinct from the urban community of Mildenhall . The loss of prime agricultural land is also a concern .	Comment noted.	Noted - potential for coalescence was a consideration during the process of identifying preferred options for the Site Allocations Local Plan.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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## ***7. Potential funding and delivery options***

### *Section 106 Obligations (S106)*

22737 - West Row Action Group (Mr John Smith) [12494]	Object	The problem in West Row that we are at the moment part of Mildenhall Parish and we often feel that 106 money finds uses in larger infrastructure projects in Mildenhall .In that way development seldom benefits our community .  <i>Having our own community council would give us a stake in the development process and a chance to use payments such as 106s to offset the effects .</i>	Comments noted.	
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### *The Community Infrastructure Levy (CIL)*

22916 - West Suffolk Councils (Mr Jonathan Geall - WSC Housing Development and Partnership) [12654]	Comment	Sub Heading S106 and CIL (7.5): The reference to the Secretary of State's 2014 announcement on the contribution of affordable housing and tariff style contributions for developments under 10 dwelling would benefit from reference to West Berks and Reading Councils' successful High Court Challenge. (It should be noted, however, that the Government has secured permission to appeal the judgement in West Berks and Reading case by an order granted by LJ Lewison.)	Comment noted.	The next draft of the IDP will be updated to reflect any changes, including the introduction of new legislation and/or regulations.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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## 8. Conclusions

### 8.1

23092 - West Row Action Group (Mr John Smith) [12494]	Comment	It does make sense to target as much development as possible where the infrastructure already exists .	Comment noted.	
23242 - Meddler Properties Ltd [6654]	Comment	see attached	Comments noted.	The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers, including those responsible for transport and highways. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, and responses to the Issues and Options SIR and SALP consultations.
22188 - West Row Action Group (Mr John Smith) [12494]	Comment	It makes much more sense to target development where there is already the infrastructure . This not only cuts down the time and expense of delivering the housing but protects rural communities from over development .	Comment noted.	

**Representations**

**Nature Summary of Main Issue/Change to Plan**

**Council's Assessment**

**Action**

**Appendix D - Summary of infrastructure requirements**

*Appendix D - Summary of infrastructure requirements*

23252 - Newmarket Horsemen's Group (NHG) [11392]

Comment

Reference is made at paragraph 5.5 to the Road Network as being 'Fundamental'. However, under Road Network (A14 / A142 Junction Newmarket) the IDP states "Not known at this stage" for both Threshold / Tipping Point and 2015 cost. The NHG is concerned to note similar responses to sewage, social infrastructure and community facilities. This highlights the Council's lack of understanding and evidence base within Newmarket to make an informed decision on the various options being considered.

Comments noted.

The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers, including those responsible for transport and highways, water, sewage, and social infrastructure. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, and responses to the Issues and Options SIR and SALP consultations.

# Local Plan Working Group



**Forest Heath**  
District Council

<b>Title of Report:</b>	<b>Core Strategy Single Issue Review (SIR) Preferred Option – (Regulation 18) Consultation Document</b>	
<b>Report No:</b>	<b>LOP/FH/16/005</b>	
<b>Report to and dates:</b>	<b>Local Plan Working Group</b>	15 February 2016
	<b>Cabinet</b>	1 March 2016
<b>Portfolio holder:</b>	James Waters Portfolio Holder for Planning and Growth <b>Tel:</b> 0771621038 <b>Email:</b> <a href="mailto:james.waters@forest-heath.gov.uk">james.waters@forest-heath.gov.uk</a>	
<b>Lead officer:</b>	Marie Smith Strategic Planning Manager <b>Tel:</b> 01638 719260 <b>Email:</b> <a href="mailto:marie.smith@westsuffolk.gov.uk">marie.smith@westsuffolk.gov.uk</a>	
<b>Purpose of report:</b>	To endorse progress made on the Core Strategy Single Issue Review (CS SIR) Local Plan document for consultation  The outcome of the meeting will inform the final draft of the CS SIR for consultation. (Member approval will be sought from Cabinet on the 1 March 2016).	
<b>Recommendation:</b>	<p><b>It is <u>RECOMMENDED</u> that the Local Plan Working Group:</b></p> <p><b>(1) Endorse progress on the Core Strategy Single Issue Review (CS SIR); and</b></p> <p><b>(2) Recommend to Cabinet that the Core Strategy Single Issue Review (CS SIR) Preferred Option document and accompanying SEA/SA together with supporting documents be approved for consultation.</b></p>	

	<b>(3) The Head of Planning and Growth, in consultation with the Portfolio Holder for Planning and Growth, be authorised to make any minor typographical, factual, spelling and grammatical changes to the document, provided that it does not materially affect the substance or meaning.</b>
<b>Key Decision:</b> <i>(Check the appropriate box and delete all those that <b>do not</b> apply.)</i>	<i>Is this a Key Decision and, if so, under which definition?</i> Yes, it is a Key Decision - <input type="checkbox"/> No, it is not a Key Decision - <input checked="" type="checkbox"/>
<b>Consultation:</b>	<ul style="list-style-type: none"> <li>• In accordance with Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, the Council's Statement of Community Involvement and Local Development Scheme.</li> </ul>
<b>Alternative option(s):</b>	<ul style="list-style-type: none"> <li>• Options for progressing the SIR Local Plan Document were considered by LPWG on 16 October 2014.</li> <li>• Housing Options Paper was considered and endorsed by LPWG on 22 April 2015.</li> <li>• CS SIR Local Plan Document and the accompanying SEA/SA and supporting documents were considered by LPWG on 30 June 2015 and agreed by Cabinet on 14 July 2015 for consultation.</li> <li>• CS SIR housing distribution options and SA implications to inform the preparation of the CS SIR Preferred Options Local Plan document, were considered by LPWG on 15 February 2016.</li> <li>• Working Paper 1 sets out the preferred and alternative option for the CS SIR consultation</li> </ul>
<b>Implications:</b>	
<i>Are there any <b>financial</b> implications? If yes, please give details</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<i>Are there any <b>staffing</b> implications? If yes, please give details</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<i>Are there any <b>ICT</b> implications? If yes, please give details</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<i>Are there any <b>legal and/or policy</b> implications? If yes, please give details</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  There is a requirement for Local Planning Authorities to produce a Local Plan and Sustainability Appraisal and to undertake consultation during its preparation under the

		Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011 and the Town and Country Planning (Local Planning) Regulations 2012.	
<i>Are there any <b>equality</b> implications? If yes, please give details</i>		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Risk/opportunity assessment:</b>		The Local Development Scheme includes a risk assessment of issues that could affect the Councils ability to deliver the Local Plan(s) in accordance with the programme. Actions to manage the risks have also been identified. Failure to prepare a sustainability appraisal which appraises all reasonable alternatives may result in an unsound Plan or legal challenge.	
<b>Risk area</b>	<b>Inherent level of risk (before controls)</b>	<b>Controls</b>	<b>Residual risk (after controls)</b>
Significant public opposition	High	Local Plan documents have the potential to be highly contentious. Whilst every effort will be made to build cross-community consensus, there is a high risk of significant public opposition.	Medium
Loss of Staff	Medium	The structure and staffing levels within the Place Shaping Team will be constantly monitored and reviewed to ensure that the appropriate level of skills and resources are maintained.	Low
Financial shortfall	Medium	In the short/medium term, the Council has allocated funds through its Financial Services Planning process to allow for the preparation of the Local Plan. In the longer term, should costs increase, a review of the financial allocation will be required.	Low
Changing Political Priorities	Medium	Proposals are discussed with Members of all parties via a variety of means, the Local Plan Working Group etc.). This helps build consensus and reduces the likelihood of wholesale change of direction from local politicians.	Low
Legal Challenge	High	As a measure of last resort anyone may issue a legal challenge within six week of adoption of the Local Plan. Officers will continue to seek to ensure that local plan documents are prepared within the legal framework in order to reduce the risk of successful legal challenge.	Medium
<b>Ward(s) affected:</b>		All Wards in the District.	

<p><b>Background papers:</b>  <i>(all background papers are to be published on the website and a link included)</i></p>	<p>Forest Heath Core Strategy Development Plan Document (May 2010).  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm</a></p> <p>Forest Heath Core Strategy Policy CS7 Single Issue Review – issues and Options 2012.  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fhcorestrategysingleissuereview.cfm">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fhcorestrategysingleissuereview.cfm</a></p> <p>Forest Heath Core Strategy Policy CS7 Single Issue Review – issues and Options 2015  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm</a></p> <p>Core Strategy Single Issue Review (SIR) – Sustainability Appraisal of housing distribution options  <a href="https://democracy.westsuffolk.gov.uk/ieListDocuments.aspx?CIId=171&amp;MIId=3163">https://democracy.westsuffolk.gov.uk/ieListDocuments.aspx?CIId=171&amp;MIId=3163</a></p>
<p><b>Documents attached:</b></p>	<p><b>Working Paper 1:</b>  Single Issue Review of Core Strategy Policy CS7 Overall Housing Provision and Distribution – Preferred Option</p>



## **1. Key issues and reasons for recommendation(s)**

### **1.1 Background**

- 1.1.1 The Core Strategy Single Issue Review (CS SIR) revisits the quashed parts of the 2010 Core Strategy as well as reassessing overall housing need/numbers to ensure compliance with the National Planning Policy Framework (NPPF).
- 1.1.2 An 'Issues and Options' (Regulation 18) consultation was completed on the Core Strategy SIR in July to September 2012, with a second Issues and Options (regulation 18) consultation taking place between August and October 2015.
- 1.1.3 A third Issues and Options consultation is scheduled to take place between 4 April and 8 June 2016, and it is the preferred option consultation draft of the Core Strategy SIR which is attached to this paper (See Working Paper 1).

### **Core Strategy Single Issue Review (SIR) – Sustainability Appraisal of housing distribution options**

- 1.1.4 A report was presented to Local Plan Working Group on 19 January setting out the Sustainability Appraisal work undertaken during the development of the refined housing distribution options.
- 1.1.5 Three potential options were proposed in the report but it was the view of officers, and the consultants appointed to undertake the Sustainability Appraisal work, that in order to progress the CS SIR and to ensure a more engaging consultation, a smaller number of options for consultation should be included in the next CS SIR document - one to be indicated as the council's preferred option and one as an alternative.
- 1.1.6 The report stated it was likely that option 1 (Higher growth at Mildenhall and Red Lodge and Primary Villages, enabling lower growth at Newmarket) would be presented as the council's final preferred option, a decision which is reinforced by this option ranking mostly highly in terms of performance against the SA objectives, and option 2 (Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages) would be presented as an alternative option, but will not be preferred.

### **Core Strategy Single Issue Review Preferred Option**

- 1.1.7 Working Paper 1 is the third 'Issues and Options' (Regulation 18) CS SIR consultation document. This document considers one option for the overall level of housing to be provided in the district from 2011 to 2031 and two reasonable options (one of which is the council's preferred option) for its distribution between towns and villages (as outlined in paragraph 1.1.6 above).
- 1.1.8 The purpose of the consultation document is to stimulate further debate

on housing quantum and the most appropriate way to distribute the housing need throughout the district. The document asks questions and invites comments from both the public and statutory stakeholders. The council is still evidence gathering at this stage and is not making a final decision on the distribution of housing, but is giving an indication of its preferred strategy.

## **1.2 Sustainability Appraisal (SA) of the distribution options**

- 1.2.1 A Sustainability Appraisal (SA) is a tool for appraising policies to ensure they reflect sustainable development objectives. Sustainability Appraisals are required for all local development documents. Strategic Environmental Assessment (SEA) is a procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
- 1.2.2 Consultants have been appointed to undertake the full SA and SEA work in relation to the next consultation draft of the SIR document. A full report setting out the findings of the SA and SEA and the proposed CS SIR Regulation 18 consultation will accompany the document for consultation in April 2016.

## **2. Next Steps**

- 2.1 Following this Local Plan Working Group, the final CS SIR document will be taken for approval for consultation by Cabinet on 1 March 2016.
- 2.2 The design and printing of the documents will take a further few weeks from the Cabinet meeting; therefore consultation is planned from the 4 April until 8 June 2016.
- 2.3 Comments received during this next consultation will be considered and brought back to the Local Plans Working Group before being fed into the final consultations for both the Site Allocations and Core Strategy Single Issue Review in late Summer/Autumn 2016. Submission of the documents for independent examination will follow in December 2016.



# Forest Heath District Council

## Single Issue Review (SIR) of Core Strategy Policy CS7 Overall Housing Provision and Distribution

Preferred Option

3rd Regulation 18 stage  
Consultation

April 2016



Forest Heath  
District Council

# Contents

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# 1. What is this consultation about?

1.1 Forest Heath District Council is planning for long term growth so that there is certainty in how and where our settlements will grow. This consultation document, on the council's review of Core Strategy Policy CS7, is your opportunity to contribute to how Forest Heath will look and function in the future.

1.2 Following on from the Issues and Options consultations held in 2012 and 2015, this third Regulation 18 consultation sets out the council's preferred option for the level of housing to be provided within the district and two alternative housing distribution options, one of which is the council's preferred option. This document will be subject to an 8 week period of statutory consultation between 4 April and 8 June 2016. We welcome responses from both the public and statutory stakeholders.

1.3 Help in explaining some of the technical aspects is provided in the full glossary at Appendix A and in accompanying leaflets and consultation materials, available on line <http://westsuffolk.jdi-consult.net/localplan/>

1.4 The consultation documents are available to view on the council's website at the web link above. Details of how to comment on this document are set out below.

## Evidence which has helped inform this document

1.5 We have used a number of documents based on research and evidence to develop the options in this Single Issue Review. A summary of the key evidence is summarised in the short report 'Local Plan Evidence Base' available at the web link above.

## Sustainability Appraisal and Habitats Regulations (Screening) Assessment

1.6 The Sustainability Appraisal (SA) is an appraisal of the economic, social and environmental sustainability of an emerging local plan, and alternatives. An interim SA Report is published alongside this consultation document, with a view to providing further information on the merits of the options under consideration. The interim SA Report also explains how 'scoping' work was undertaken in early 2015, which included consultation on a Scoping Report (see <http://westsuffolk.jdi-consult.net/localplan/>). The Scoping Report draws together information about the district to establish a sustainability baseline and determine the key issues and objectives that should be a focus of SA.

1.7 The Habitats Regulations (SI No. 2010/490) require 'appropriate assessment' of land-use plans that are likely to have a significant effect on a 'European site' (certain internationally designated wildlife habitats) either alone or in combination with other plans or projects. The options in this document have been subject to screening to determine whether they are likely to have a significant effect on any European site and hence whether 'appropriate assessment' will be required at a later stage in the plan-making process, if those options are taken forward. The process of screening and, if required, appropriate assessment under the Habitats Regulations is commonly referred to as Habitats Regulations Assessment (HRA) and the initial stage as HRA Screening. The HRA Screening Report has been prepared by independent consultants LUC on behalf of the council.

## How to make comments

1.8 We ask that responses are made online by visiting the council's public consultation website <http://westsuffolk.jdi-consult.net/localplan/>

1.9 Alternatively, written responses will be accepted and a paper response form can be obtained by telephoning 01284 757368 or emailing [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

1.10 Please return paper response forms/letters to:

Strategic Planning Team  
Forest Heath District Council  
West Suffolk House  
Western Way  
Bury St Edmunds  
IP33 3YU

**All responses must be returned by 5pm on 8 June 2016. Please note that late responses will not be accepted.**

1.11 When making a comment it is important to be as specific as possible, setting out the question you are referring to and your answer.

1.12 Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or online.

1.13 The questions are set out at various points within this document. If you wish to submit supporting material with your response it would be helpful if you can do so electronically and include a summary of the content within the question response.

1.14 Where there are groups who share a common view on an issue in the document, it would be helpful if that group could send in a single response indicating how many people it is representing and how the response has been authorised.

## What happens next?

1.15 The responses to this consultation will help inform the preparation of the submission (final) document which will set out the council's final strategy for the level and distribution of housing across the district. Consultation is programmed to take place on this final draft in September 2016.

1.16 Following this, the final draft of the Core Strategy Policy CS7 and the consultation comments received, will be submitted to the Secretary of State for an independent planning examination scheduled to take place in early 2017.

## 2. The Single Issue Review process

- 2.1 The Core Strategy is part of Forest Heath’s Development Plan, a suite of planning documents that will eventually replace the council’s Local Plan (1995) saved policies, in accordance with the National Planning Policy Framework (NPPF (2012)).
- 2.2 The Core Strategy is the principal strategic document which provides an overall vision and framework for the growth of Forest Heath and is underpinned by the principle of sustainability. This Single Issue Review (SIR) of Core Strategy Policy CS7 was prompted by a successful High Court challenge.
- 2.3 In August-October 2015, an initial Issues and Options consultation took place on the Core Strategy Single Issue Review. The results of this consultation, and council comments to the responses received, can be viewed at <http://westsuffolk.jdi-consult.net/localplan/>

### Anticipated timetable for the Single Issue Review (SIR)

Approximate Timetable	Reg. No.	Stage in Single Issue Review
July - September 2012	18	Initial Issues and Options Consultation
August – October 2015	18	Further consultation on Issues and Options
April – June 2016	18	Consultation on Preferred Options
September - October 2016	19	SIR Proposed Submission document consultation
December 2016	22	Submission of SIR document to the Secretary of State
February 2017	24	Examination in Public into ‘soundness’ of SIR
June 2017	25	Inspector’s Report into ‘soundness’ of the SIR
August 2017	26	Adoption of SIR document by the council and incorporation into the Development Plan for the district.

\*The timetable above is based on the February 2016 Local Development Scheme

## 3. Setting an appropriate housing provision

### What we have learnt so far

- 3.1 A consultation into the Single Issue Review Issues and Options document took place from August to October 2015. We consulted on two options for housing provision, as shown in the table below. Option 1 providing for

7000 homes, as evidenced by the Strategic Housing Market Assessment (SHMA) 2013 update. Option 2 provided for 7700 homes, representing a 10% increase on the SHMA (2013 update) requirement in order to address more of the affordable housing need.

### 3.2 Options for housing provision consulted at the SIR Issues and Options stage, August - October 2015

	Overall number of homes each year	Overall number over 20 years (2011-2031)	Homes already built or planned (as at 31 March 2014)	Additional homes required 2011-2031
Option 1 The ‘all homes’ housing requirement of the SHMA (2013)	350	7000	1700 (rounded)	5300
Option 2 Uplift for affordable housing (+10%)	385	7700	1700 (rounded)	6000

- 3.3 The consultation document set a provision using housing completions and commitments at 31 March 2014, the most up to date information available at that time.

other environmental objectives; however, there is potential to mitigate hence significant negative effects are not predicted for Option 2.

- 3.4 An interim Sustainability Appraisal Report was published alongside the SIR Issues and Options consultation document, which appraised the two housing growth options. It concluded that Option 2 would be preferable in terms of meeting the housing objectives, as identified affordable housing needs would be met to a greater extent and might lead to additional opportunities in terms of other community and economic objectives. However it stated it was not possible to conclude that a higher growth strategy would perform significantly better.

- 3.6 The Habitats Regulations (SI No. 2010/490) require ‘appropriate assessment’ of land use plans that are likely to have a significant effect on a ‘European site’. In summary, for both options, it concluded, prior to or after existing mitigation, it was unable to rule out potential for likely significant effects until the HRA of housing distribution options and site allocation options are completed. Potentially affected sites are Breckland Special Area of Conservation (SAC)/Special Protection Area (SPA), Devil’s Dyke SAC, Rex Graham Reserve SAC. It concluded there was a likely significant effects on disturbance to Annex I birds, flood risk and associated water contamination, water supply and air pollution from roads.

- 3.5 The higher growth strategy would make it more of a challenge to avoid impacts to the internationally important wildlife sites and



**Responses to 2015 SIR consultation**

3.7 Forty eight individual responses were received on the two housing provision options in the 2015 SIR Issues and Options consultation document (Question 1). The comments received, and the council’s responses to them, can be read in full at <http://westsuffolk.jdi-consult.net/localplan/>. The responses along with other evidence, have helped to inform the preferred housing growth provision for the district.

3.8 In response to Question 1, *Which of the two options for growth do you think we should plan for and why?* the following feedback was given:

- ten respondents indicated a preference or support for Option 1, proposing 7000 homes;
- fourteen indicated a preference or support for Option 2, proposing 7700 homes; and
- twenty four either objected to Options 1 and/or 2 or supported neither.

**What does this tell us?**

3.9 The responses to the consultation raised the following key points:

- there is not a huge difference between the two options in terms of dwelling numbers, so it is difficult to state that Option 2 would cause a much greater impact on the historic environment than Option 1;
- the absolute pre-requisite is for the council fully to understand the implications of closure of RAF Mildenhall and to obtain more up to date information before it can properly or responsibly assess the housing need for the area;
- the council should consult on higher growth options to allow these options to be properly tested;
- there does not appear to be any up-to-date

evidence base to support a 10% increase to assist in delivering affordable housing;

- the NPPF makes clear that authorities should boost significantly the supply of housing (NPPF, paragraph 47) and therefore providing more market housing than required under the Strategic Housing Market Assessment (SHMA) should not be a barrier to growth;
- as a minimum, the SIR should consider an option capable of providing the full objective requirement for affordable units;
- given the environmental constraints affecting so much of Forest Heath, a higher target (Option 2) would be unrealistic.

**What the evidence tells us**

3.10 The SHMA was prepared in 2013 and indicated an objectively assessed need (OAN) for 350 dwellings per annum for Forest Heath in the period 2011-2031, or 7000 homes in total. This figure was used to inform the two options for the overall housing provision planned for at the 2nd Issues and Options stage of the SIR.

3.11 Following changes in national policy and guidance, and other local circumstances including the planned closure of the RAF Mildenhall airbase, an update of the objectively assessed housing need was commissioned. Cambridge Research Group published an updated OAN in January 2016, indicating a revised ‘all homes’ need for 6800 dwellings, 200 dwellings lower than the previous SHMA indicated and this covers the same time period 2011-2031. This assessment was supported by evidence prepared by Peter Brett Associates (PBA) on behalf of the council which considered the impact of market signals on both the objectively assessed housing need and whether an uplift is justified in setting a housing provision target to meet more of the affordable housing need. Both reports can be read in full at <http://westsuffolk.jdi-consult.net/localplan/>

3.12 National planning policy and guidance makes clear that local planning authorities should undertake their own assessment of their housing needs and set an appropriate target to meet these needs. The process for setting this housing provision target is clearly set out in the PBA report. The PBA report concludes that an uplift of 5% is appropriate adjustment, giving rise to an overall OAN of 6800 dwellings. This figure was also considered appropriate as a housing provision target.

3.13 The affordable housing need for 2014 for the district has been confirmed at 2638 dwellings, 65 fewer than the 2703 dwellings reported at the Issue and Options stage. This slight reduction in need when read alongside the reduced ‘all homes’ housing need of 6800 will not materially alter the overall balance between affordable need and ‘all homes’ need previously reported at the Issues and Options stage.

3.14 The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure.

**Developing the preferred option**

3.15 The further evidence prepared by Cambridge Research Group and Peter Brett Associates has addressed many of the issues raised in the SIR consultation responses as listed below:

- the impact of the planned closure of the RAF Mildenhall airbase on the overall objectively assessed housing need (OAN);
- the latest Communities and Local Government (CLG) population projections and their impact on the OAN;
- whether market signals indicate a higher housing target should be set to address more of the affordable housing need;

- to complete the affordable housing need assessment for 2014;
- to update the SHMA to assess the jobs/homes balance.

3.16 The outcome of this work has set a new OAN for the district for 6800 homes over the period 2011-2031. This figure provides an appropriate housing provision target to plan for, having regard to evidence presented by PBA on market signals, the availability of suitable deliverable sites, sustainability issues including the districts environmental constraints, infrastructure constraints, affordable housing need and in accordance with the spatial strategy (policy CS1) and other local and national planning policies.

3.17 The preferred option for replacement policy CS7 is set out below;

**Preferred Option for Replacement policy CS7**

This will comprise two parts;

- Part A, setting the overall provision;
- Part B, identifying the distribution which is addressed in Section 4.

The intention is to eventually combine the two parts of the policy, in the final consultation draft, once the distribution option has been agreed.

**Overall Housing Provision CS7a**

Provision will be made for 6800 dwellings in the district over the plan period 2011 to 2031.

*Question 1: Do you agree with the overall housing figure for the district? Please provide evidence to support your answer where appropriate.*

## 4. Housing distribution

4.1 Our towns, key service centres and primary villages are the most sustainable places in the district to live, with good access to services and facilities and public transport. Policy CS1 in the 2010 Core Strategy seeks to enhance the vitality of towns and larger villages by focusing housing and employment in these locations. By doing this, we can help ensure that everyone in the district has access to a basic range of services and facilities.

4.2 The council must put in place a distribution strategy that is deliverable, and consistent with local and national policies. Work over recent months has focused on developing and giving consideration to alternative strategies, with the following issues taken into consideration:

- the need for the distribution of growth to accord with national and local policy, in particular the existing settlement hierarchy in Core Strategy Policy CS1;
- the high number of environmental constraints in the district, and the need to accord with Policy CS2 in respect of landscape, biodiversity and geodiversity interests;
- the availability of land to meet the preferred distribution option;
- outcomes of the first stage SIR Sustainability Appraisal and Habitats Regulations (Screening) Assessment;
- known infrastructure constraints (and responses to the draft 2015 Infrastructure Delivery Plan);
- the consultation comments received in the 2015 SIR consultation;
- ongoing discussions with statutory consultees such as Natural England, The Environment Agency, Anglian Water and Historic England.

### What we have learnt from the consultation responses

4.3 From August to October 2015 we asked a number of questions about how we could approach planning for the distribution of additional housing. The SIR Issues and Options document consulted on four housing distribution alternatives:

- Option 1 Focus on Mildenhall, Newmarket and Lakenheath;
- Option 2 Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge and medium growth at Mildenhall and Newmarket;
- Option 3 Focus on Red Lodge, with a planned extension, and focus on Lakenheath and Mildenhall with lower growth in Newmarket;
- Option 4 Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity.

4.4 The consultation document emphasised that these were alternatives for consideration and the final preferred option could be a combination of these four options, or even an approach that is entirely new and different.

4.5 Eighty two individual representations were received in response to the housing distribution alternatives in the 2015 SIR Issues and Options consultation document (Question 4). The comments received, and the council's responses to them, can be read in full at <http://westsuffolk.jdi-consult.net/localplan/> We have used the comments to help inform the refined alternatives proposed in this document.

### What do the comments tell us?

4.6 In summary, the responses to the consultation broadly tell us the following:

- there is support for distributing growth in accordance with the settlement hierarchy in Policy CS1, with the focus on market towns, key service centres and finally, primary villages;
- there is some support for lower growth in Newmarket (Option 3), in particular from the Horse Racing Industry;
- there is limited support for high and very high growth in the key service centres;
- there is limited support for increasing the amount of growth in primary villages.

4.7 We also asked whether there were any other distribution options (that is, other than the four consulted on) that were potentially sustainable and hence worthy of further consideration. In summary, the responses to the consultation broadly tell us the following:

- that we should be considering the future of RAF Mildenhall as an alternative location for housing;
- the potential for a new settlement somewhere in the district should be explored;
- to ensure accordance with the NPPF, and sustainable development, all three market towns should take a high level of growth;
- consider making small scale allocations in secondary villages and smaller settlements.

### What we have learnt from the evidence base

4.8 Public consultations are only one of the ways we collect information to help us develop Local Plan documents. We have carried out a range of studies/evidence based documents to help us understand all of the opportunities and constraints to growth in the district. A summary of the key evidence is summarised in

a short report available at the web link <http://westsuffolk.jdi-consult.net/localplan/>

4.9 The evidence base has helped to confirm the existing key constraints in each settlement which, along with the consultation responses, have helped inform the alternative distribution options for consultation in this document.

### Brandon

4.10 Brandon is designated as a market town in Core Strategy Policy CS1. However, further growth in the town is significantly constrained by:

- European site designations for stone curlew, woodlark and nightjar. The special protection area (SPA) and its buffer zones are described in the Core Strategy Policy CS2. This results in only limited settlement expansion in Brandon without first demonstrating mitigation for the presence of the various protected species;
- airbase noise constraints to the south of Brandon as a consequence of aircraft landing at and taking off from RAF Lakenheath;
- the conservation area and listed buildings and their settings;
- land within Flood Zones 2 and 3 to the north of the settlement along the Little Ouse river according to the Environment Agency's mapping;
- a site of special scientific interest (SSSI) lies to the south and east of Brandon;
- Brandon is surrounded by an extensive area of forest, Brandon Country Park and High Lodge Forest Centre.

### Implications for the options

The environmental constraints, particularly the requirement to demonstrate mitigation within the SPA and its associated buffers, means that there is very limited capacity for growth in and around the town.



**Mildenhall**

4.11 Mildenhall is also a market town and is a sustainable location for new development, albeit it is constrained by:

- the special protection area (SPA) designations for stone curlew, nightjar and woodlark. Very limited settlement expansion is possible to the east of the settlement without first demonstrating appropriate mitigation for the presence of the protected species;
- aircraft noise constraints to the north of the town associated with RAF Mildenhall airbase flight paths;
- the conservation area and listed buildings and their settings;
- a significant area of land to the south of the settlement that lies within Flood Zones 2 and 3 according to data provided by the Environment Agency.

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**Implications for the options**

The environmental constraints on the eastern side of the town, particularly the requirement to demonstrate mitigation within the SPA and its associated buffers, means that there is very limited capacity for growth. However, there is an area of relatively unconstrained land to the west of the town.

The planned closure of the UASFE airbase in Mildenhall is not expected to take place until 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Single Issue Review. Should this position change during the plan period, the council will immediately commence a review of the Local Plan.

**Newmarket**

4.12 Newmarket is a market town and is a sustainable location for new development, albeit it is constrained by:

- a significant area of land within Flood Zones 1 or 2 running north/south through the middle of the settlement;
- settlement expansion is significantly constrained by the Horse Racing Industry and its associated land uses. Other policies within the Local Plan seek to safeguard the racing industry and its assets;
- land to the east and south-west of the settlement is within the Newmarket Heath Site of Special Scientific Interest (SSSI);
- the conservation area and listed buildings and their settings;
- The need to carefully manage the movements of vehicles and horses within the town itself.

**Implications for the options**

Significant growth in Newmarket is dependent on the availability of a site at Hatchfield Farm to the north east of the town. The council is currently awaiting the Secretary of State’s decision on a called in application for 400 homes on the site. However, current planning evidence suggests that this land is available and deliverable and can be included in the options for distribution. Should the situation change, as a result of the Secretary of State’s decision, the implications of the current options in this document will be reassessed.

**Lakenheath**

4.13 Lakenheath is designated as a key service centre in Core Strategy Policy CS1 and is a sustainable location for new development, albeit it is constrained by:

- European site designations for stone curlew. The special protection area (SPA) and its buffer zones are described in the Core Strategy Policy CS2 and limit possible settlement expansion in Lakenheath without first demonstrating mitigation for the presence of various protected species;
- historic information indicates there are noise constraints to the south of Lakenheath due to aircraft landing at and taking off from RAF Lakenheath;
- land within Flood Zones 2 and 3 to the north, west and south of the settlement, according to the Environment Agency’s mapping;
- Maids Cross Hill Local Nature Reserve and Site of Special Scientific Interest (SSSI) lies to the south east of Lakenheath;
- a special area of conservation (SAC) zone lies to the south-east of Lakenheath;
- a county wildlife site (CWS) lies to the east of Lakenheath;
- there is a Ministry of Defence (MOD) safeguarded zone around the airbase;
- there is a Conservation Area in the centre, along with a number of listed buildings.

**Implications for the options**

The environmental constraints to the east and the south of the village, particularly the requirement to demonstrate mitigation within the SPA and its associated buffers, means that there is limited capacity for growth. However, there is an area of relatively unconstrained land to the north of the village.

**Red Lodge**

4.14 Red Lodge is a key service centre and is a sustainable location for new development, albeit it is constrained by:

- European site designations for the stone curlew. The special protection area (SPA) and its buffer zones are described in the Core Strategy Policy CS2. In effect this limits possible expansion in Red Lodge to the east without first demonstrating mitigation for the direct and indirect impacts of development on the specified protected species;
- land within Flood Zones 2 and 3 runs along the River Kennett where it coincides with the district boundary to the south of the settlement according to the Environment Agency’s mapping;
- Red Lodge Heath to the south of Turnpike Road is a 21 hectare site of special scientific interest (SSSI) within the existing settlement boundary;
- the A11 runs to the north-west of the settlement and forms a physical boundary to existing development.

**Implications for the options**

The environmental constraints to the east and the south of the settlement, particularly the requirement to demonstrate mitigation within the SPA and its associated buffers, means that there is limited capacity for growth to the east. However, there is an area of relatively unconstrained land to the north as well as some opportunities for development within the settlement boundary.

**Beck Row**

4.15 Beck Row is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth include:

- aircraft noise constraints to the north and south as a consequence of aircraft landing at and taking off from both RAF Lakenheath and RAF Mildenhall;
- to the west of the settlement there are areas of land within Flood Zones 2 and 3;
- there is a local nature reserve, also identified as an area of archaeological importance in the centre of the settlement;
- the A1101 forms a physical boundary to the south and confines any further development;
- coalescence should be avoided with the settlement of Holywell Row, lying to the east of Beck Row.

**Implications for the options**

The village has seen a significant number of planning approvals since the start of the plan period in 2011. This is already sufficient to meet the housing needs in the Single Issue Review, taking into account the village's constraints and position in the settlement hierarchy.

**Exning**

4.16 Exning is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in Exning include:

- land within Flood Zones 2 and 3 running north/south through the settlement and also to the east of the settlement boundary;
- there is a Conservation Area in the centre, along with a number of listed buildings.

**Implications for the options**

The village has some capacity for growth, taking into account the constraints listed above.

**Kentford**

4.17 Kentford is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in Kentford include:

- land within Flood Zones 2 and 3 running north/south through the settlement;
- Habitats Regulations designations for stone curlew. The habitats protection buffers are described in Core Strategy Policy CS2 and the effect is that very limited settlement expansion is possible to the south and east without demonstrating mitigation for the presence of the protected species.

**Implications for the options**

The village has seen a significant number of planning approvals since the start of the plan period in 2011. This is already sufficient to meet the housing needs in the Single Issue Review, taking into account the village's constraints and position in the settlement hierarchy.

**West Row**

4.18 West Row is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in West Row include:

- aircraft noise constraints to the north, associated with both RAF Lakenheath and RAF Mildenhall airbase flight paths;
- land to the south of the settlement lies within Flood Zones 2 and 3 of the River Lark (according to data provided by the Environment Agency);
- potential for settlement coalescence with Thistley Green to the west and/or Mildenhall to the east.

**Implications for the options**

The village has some capacity for growth taking into account the constraints listed above.

**Reasonable distribution alternatives**

4.19 Taking into account all of the information available to us, the following pages set out two alternative approaches that might be taken to determine the distribution of housing across the district. These are thought to be 'the reasonable alternatives' at the current time. They are a refinement of the alternatives consulted on at the Issues and Options stage, having been developed taking into consideration the consultation comments received and the evidence base. It is important to recognise that each option is subject to ongoing testing to determine whether it can deliver the required level of housing in a sustainable manner.

4.20 The tables overleaf summarise the reasonable alternatives that have been established, with the first being the council's preferred option. A summary is provided below the tables setting

out a reasoned justification for each option. We are keen to hear your views on whether you agree with the council's preference for taking forward Option 1, or whether you think Option 2 would be the most appropriate option for the future distribution of housing across the district.

4.21 The tables show the proposed growth in towns and key service centres separated by settlement, whilst the proposed growth in primary villages has now been combined. It is intended that the primary villages will continue to fulfil their roles as settlements to meet local needs and to support rural sustainability in accordance with Core Strategy Policy CS1, and in addition, this approach of combining the distribution in primary villages will allow greater flexibility in the plan making process, something advocated in the National Planning Policy Framework. The distribution between the primary villages will be determined through the Preferred Options Site Allocations Local Plan, which is on consultation in tandem with the Single Issue Review and can be seen at <http://westsuffolk.jdi-consult.net/localplan>

4.22 It is also important to bear in mind that further housing will also come from unallocated sites, known as 'windfalls', which are schemes which comply with general local plan policies, for example for redeveloping derelict sites, finding a new use for empty buildings, or utilising appropriate infill plots within settlements.

4.23 An interim SA report was published in January 2016 which appraised three new potential distribution options for further consultation against the SA objectives. This interim report can be seen at <http://westsuffolk.jdi-consult.net/localplan> As a result of the SA findings, and other evidence based work, one of the three options was discounted at that stage leaving two reasonable alternatives for

consultation – the two options set out in the tables below. The third option was discounted as it proposed a similar level of growth in Newmarket to that proposed in Option 2 overleaf. Due to the ongoing uncertainty around the issuing and content of the Hatchfield Farm decision, it was considered inappropriate to consult on two high growth options for Newmarket at this time.

4.24 A further Sustainability Appraisal has been undertaken to better understand the potential effects of these two alternatives against key sustainability criteria. A summary of this assessment is set out in the tables below to help you respond to this consultation. The full Sustainability Appraisal findings can be viewed at the web link <http://westsuffolk.jdi-consult.net/localplan>

**Distribution Option 1: Higher growth at Mildenhall and Red Lodge and Primary Villages, enabling lower growth at Newmarket**

(council’s preferred option)

Settlement	Existing commitments and completions (2011-2015)	Additional provision	Windfall	Totals	Percentage distribution
Brandon	55	70		125	2%
Mildenhall	177	1350		1527	22%
Newmarket	288	680		968	14%
Lakenheath	76	800		876	13%
Red Lodge	704	950		1654	24%
Primary Villages	596	750		1346	20%
Other potential *	92		220	312	5%
<b>TOTALS</b>	<b>1988</b>	<b>4600</b>	<b>220</b>	<b>6808</b>	<b>100%</b>

\*Other potential includes rural completions and commitments and windfall

**Summary**

- this option conforms with Policy CS1 of the Core Strategy, in seeking to deliver the additional housing growth required in accordance with the settlement hierarchy;
- the opportunity for, and viability of increasing sustainable modes of public transport use will be optimised by focusing growth in the top two tiers of the settlement hierarchy;
- there is a large area of available unconstrained land to the west of Mildenhall which could provide the opportunity for a well-planned mixed use development. The council is continuing to work with stakeholders to determine the infrastructure requirements required as a result of

- this growth. (See the revised draft Infrastructure Delivery Plan for more details);
- the environmental designations around Brandon would be protected from the negative effects of development, but the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- the growth in Newmarket would balance the need to protect the Horse Racing Industry while delivering additional growth, meeting the needs of the whole town;
- growth at Red Lodge and Lakenheath is the maximum these settlements can deliver in this plan period, taking into account existing

- environmental and infrastructure constraints and will help to deliver new schools, roads and green infrastructure;
- the constraints in Brandon and Newmarket mean that growth which could have been directed to these settlements is proposed for distribution elsewhere;

- primary villages would be protected from any further large increases in growth in the plan period, with development instead being directed to settlements with better ranges of services and facilities.

**Distribution Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages**

(council’s non-preferred option)

Settlement	Existing commitments and completions (2011-2015)	Additional provision	Windfall	Totals	Percentage distribution
Brandon	55	70		125	2%
Mildenhall	177	1150		1327	19%
Newmarket	288	1080		1368	20%
Lakenheath	76	800		876	13%
Red Lodge	704	850		1554	23%
Primary Villages	596	650		1246	18%
Other potential *	92		220	312	5%
<b>TOTALS</b>	<b>1988</b>	<b>4600</b>	<b>220</b>	<b>6808</b>	<b>100%</b>

\*Other potential includes rural completions and commitments and windfall

**In comparison to Option 1, Option 2 is proposing:**

- 200 homes fewer at Mildenhall;
- 400 homes more at Newmarket;
- 100 homes fewer at Red Lodge;
- 100 homes fewer across the primary villages.

**Summary**

- this option also conforms with Policy CS1 of the Core Strategy, in seeking to deliver the additional housing growth required in accordance with the settlement hierarchy;
- the majority of the growth would be concentrated in Mildenhall and Newmarket where a good range of key services and facilities already exist;

- the length of journeys by private car will be reduced due to the closer relationship of homes to areas of existing and new employment in Mildenhall and Newmarket;
- the majority of growth in Newmarket would be on the Hatchfield Farm site to the north east of Newmarket. Given the past issues in trying to deliver this site, including a High Court challenge and two appeals (one dismissed on prematurity and one called in) and the need to ensure an appropriate balance around managing the



- movements of vehicles and horses within the town, it may be more appropriate for a lower growth in the town;
- this option does not allow for the additional capacity available on the unconstrained site west of Mildenhall which could be considered to be a reasonable and sustainable alternative to growth in other more constrained parts of the district;
- the environmental designations around Brandon would be protected from the negative effects of development, but the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- growth at Red Lodge and the primary villages would be lower than in Option 1, as a consequence of higher growth in Newmarket. This would further protect primary villages from any large increases in growth in the plan period, with development instead being directed to settlements with better ranges of services and facilities.

A Sustainability Appraisal has been undertaken for the above two options and a summary of the conclusions are set out below.

INSERT SUSTAINABILITY APPRAISAL COMMENTARY ON PROS AND CONS OF EACH OPTION

N.B Further information on the alternative options is set out in the full Sustainability Appraisal and Habitats Regulations (Screening) Assessment which accompanies this consultation document.

Question 2: Which of the two housing distribution options do you prefer? Please set out reasons for your answer.

# Appendix A: Glossary of terms

## Adoption

The final confirmation of a local plan document as having statutory (legal) status for implementation by a local planning authority (LPA).

## Agricultural Land Classification

Classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades (Grade 1, 2 and 3a) are referred to as 'best and most versatile' land and enjoy significant protection from development. Grade 4 and 5 are described as poor quality agricultural land and very poor quality agricultural land.

## Amenity Open Space

An area that is primarily of visual importance but may also be used for recreation either formally or informally.

## Annual Monitoring Report (AMR)

Report produced every year on the progress of preparing the local plan and the extent to which policies within it are being achieved.

## Breckland Special Protection Area and Special Area of Conservation

See SPA

## Buffer zones

Core Strategy Policy CS2 defines buffer zones outside of the Breckland SPA where development could have an impact on protected species. Where it can not be concluded that development in these buffers would not result in a significant effect on the SPA, development would not be allowed.

## Brownfield land

Also known as previously developed land, this is land which is or was occupied by a permanent structure (excluding agricultural or forestry buildings).

## Cambridge sub region Housing Market Area

The Cambridge housing sub-region is made up of seven district councils; five in Cambridgeshire and two in Suffolk:

- Cambridge;
- East Cambridgeshire;
- Fenland;
- Huntingdonshire;
- South Cambridgeshire;
- Forest Heath (Suffolk);
- St Edmundsbury (Suffolk).

## Conservation Area

Areas of special architectural or historic interest that we want to preserve the character, appearance and/or setting.

## Core Strategy

Outlines the key principles regarding the development and use of land within a local planning authority's area.

## Core Strategy Policy CS1: Spatial strategy

Provides a broad indication of the overall scale of development in the district.

## Core Strategy Policy CS2: Natural environment

Provides protection for the wealth of conservation interests in the district.

## Core Strategy Policy CS7: Overall housing provision

This policy was quashed as a result of the High Court challenge and is being reviewed through the Single Issue Review.

## Core Strategy Policy CS9: Affordable housing provision

Sets out the policy requirements for affordable housing in the district in relation to new development.

## Core Strategy Policy CS13: Infrastructure and developer contributions

Provides guidance on infrastructure requirements in relation to new development.

## County Wildlife Site (CWS)

This designation is non-statutory but is recognition of a site's high value for wildlife, with many sites being of county and often regional or national importance. They often support characteristic or threatened species and habitats included in Local and National Biodiversity Action Plans.

## Curtilage

The area immediately adjoining and around a residential dwelling. Note: not all garden or land within the same ownership is necessarily the 'curtilage' for planning purposes and discussion with the authority is recommended to establish matters in each circumstance.

## Development Management

The term applied to the consideration and determination of planning applications by a local planning authority (LPA).

## Development Plan

The statutory development plan comprises the development plan documents contained in an authority's Local Plan.

## Development Plan Document (DPD)

Development plan documents include adopted Local Plans and Neighbourhood Plans.

## Flood Risk Assessment (FRA)

An assessment of the risk of flooding, particularly in relation to residential, commercial and industrial land uses. The Environment Agency requires a Flood Risk Assessment (FRA) to be submitted alongside planning applications in areas that are known to be at risk of flooding (within flood zones 2 or 3) and/or are greater than 1 hectare.

## Flood Zones

Flood Zones refer to the probability of a river or the sea flooding, ignoring the presence of defences. The zones are shown on the Environment Agency's Flood Map available to view via their webpages.

## Greenfield land

Land (or a defined site) which has never been built on before or where the remains of any structure or activity have blended into the landscape over time (opposite of brownfield).

## Gypsies and Travellers

Defined under the Housing Act (2004) as persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependent's educational or health needs or old age, have ceased to travel temporarily or permanently and all other persons with a cultural tradition of nomadism and/or caravan dwelling.

## Habitats Directive

A European Union Directive adopted in 1992 as an EU response to the Berne Convention. It is one of the EU's two directives in relation to wildlife and nature conservation, the other being the Birds Directive.

## Habitats Regulations Assessment (HRA)

An assessment undertaken to consider and appraise the likely impact of a plan or project upon designated sites of nature conservation importance.

## Horse Racing Industry (HRI)

A term applied to the unique assembly of horse racing related interests concentrated in and around Newmarket.

## Housing Settlement Boundary/defined settlement

These represent the development limits of residential areas within which development proposals would be acceptable subject to complying with other policies contained in the development plan. They seek to prevent development from gradually extending into the surrounding countryside.

**Housing Stock**

The total number of houses/flats in an area.

**Infrastructure Delivery Plan (IDP)**

A document setting out the infrastructure issues and requirements for the district to facilitate growth within a given plan period.

**Infrastructure and Environmental Capacity Appraisal (IECA)**

This study considers the environmental capacity of settlements and the need for and means of providing and maintaining social, physical and environmental infrastructure to support growth in Forest Heath District and St Edmundsbury Borough areas.

**Issues and Options**

Documents produced during the early stages in the preparation of development plan documents and issued for consultation.

**Joint Development Management Policies Document (JDMPPD)**

The document containing policies that are used in day-to-day development management decision making in Forest Heath and St Edmundsbury areas.

**Key Service Centre**

A higher order settlement, as defined in the Forest Heath 2010 Core Strategy. The services and facilities available in key service centres include some if not all of: a convenience shop, public transport, health care, primary school and access to employment opportunities.

**Listed Building**

This is a building that has been placed on the Statutory List of Buildings of Special Architectural or Historic Interest.

**Local Development Scheme (LDS)**

This sets out a programme for the preparation of local plan documents. It is a project management tool that identifies which documents are to be prepared, the various stages required in their production together with a detailed timetable.

**Localism Act**

The Localism Act introduces a number of changes to planning, including the abolition of Regional Spatial Strategies and the introduction of neighbourhood plans.

**Local Plan (LP)**

The name for the portfolio of local development plan documents including the Core Strategy, Joint Development Management Policies Document, Site Allocations Local Plan and Single Issue Review. Together these documents will provide the framework for delivering the spatial planning strategy for the district.

**Local Plan (1995) saved policies**

Policies in the 1995 Local Plan that have been 'saved' until the adoption of the new Local Plan. The saved policies can be seen at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan)

**Local Planning Authority (LPA)**

The public authority whose duty it is to carry out specific planning functions for a particular area. For West Suffolk this is Forest Heath District Council and St Edmundsbury Borough council.

**Local Wildlife Site (LWS)**

These are areas which are important for the conservation of wildlife. They may support threatened habitats, such as chalk grassland or ancient woodland, or may be important for the wild plants or animals which are present.

**Market Town**

The highest order of settlement as defined in the Forest Heath Core Strategy 2010. These contain a range of service, facilities and amenities and act as transport hubs.

**Material consideration**

A factor which will be taken into account when reaching a decision on a planning application or appeal. Under Section 38 of the Planning and Compulsory Purchase Act 2004, decisions on planning applications 'must be made in accordance with the (development) plan unless other material considerations indicate otherwise'.

**Ministry of Defence (MOD)**

That part of the Government responsible for matters of defence.

**National Planning Policy Framework (NPPF (2012))**

Designed to consolidate all policy statements, circulars and guidance documents into a single, simpler National Planning Policy Framework. The new 2012 framework is intended to be user-friendly and accessible with clear policies for making robust local and neighbourhood plans and development management decisions.

**National Planning Practice Guidance (NPPG 2012))**

Online suite of national planning guidance intended to elucidate on sections of the national planning policy as contained in the National Planning Policy Framework (NPPF).

**Nature Reserve**

A protected area of importance for wildlife, flora, fauna or features of geological or other special interest, which is reserved and managed for conservation and to provide special opportunities for study or research.

**Neighbourhood Plans**

A plan prepared by a parish council or neighbourhood forum for a particular neighbourhood area made under the Planning and Compulsory Purchase Act 2004.

**Objectively Assessed Needs (OAN)**

The housing that households are willing and able to buy or rent, either from their own resources or with assistance from the state (Planning Advisory Service definition, June 2014).

**Preferred Options**

Documents produced as part of the preparation of development plan documents and issued for formal public participation. The document shows the preferred 'direction', but not the final version, of a development plan document.

**Primary Village**

A lower order settlement that provides basic level services as defined in the Forest Heath 2010 Core Strategy.

**Regionally Important Geological Sites (RIGS)**

Commonly referred to by their acronym RIGS, these are locally designated sites of local, national and regional importance for geodiversity (geology and geomorphology) in the United Kingdom.

**Scheduled Ancient Monument (SAM)**

A scheduled monument is a 'nationally important' archaeological site or historic building given protection against unauthorised change.

**SI No. 2010 / 490**

The Conservation of Habitats and Species Regulations 2010.

**Single Issue Review (SIR)**

Forest Heath's Core Strategy (as adopted in 2010) was the subject of a High Court Order in 2011 which essentially quashed the distribution and phasing of housing delivery for Forest Heath as this appeared within Core Strategy Policy CS7 of the document. The council resolved to revisit all aspects of Core Strategy Policy CS7 (to include a reassessment of overall growth for the district) from the initial Issues and Options stage - a process termed as Single Issue Review.

**Site Allocations Local Plan (SALP)**

Allocates sites for homes, jobs and community facilities.

**Site of Special Scientific Interest (SSSI)**

This is a conservation designation denoting a protected area in the United Kingdom.



**Site Specific Allocation Policies**

Policies that relate to the allocation of land for development. Policies will identify specific requirements for individual proposals. The sites themselves will be shown on a Policies Map.

**Special Areas of Conservation (SAC)**

These are designed under the Habitats Directive which requires the establishment and protection of a European network of important high-quality conservation sites that make a significant contribution to conserving the habitats and species identified in the Directive.

**Special Protection Area (SPA)**

This is a designation under the European Union Directive on the conservation of wild birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds. Together with special areas of conservation (SACs) the SPAs form a network of protected sites across the EU called Natura 2000.

**Special Protection Area (SPA) components**

These are the sites of special scientific interest (SSSI) which make up and underpin the special protection area designation.

**Strategic Environment Assessment (SEA)**

The European Strategic Environment Assessment Directive (2001/42/EC) requires an assessment of certain plans and programmes including those related to planning and land-use.

**Strategic Housing Market Assessment (SHMA)**

A document which provides an objective assessment of the need for all homes, as well as for affordable homes, to inform local plan reviews.

**Strategic Housing Land Availability Assessment (SHLAA)**

One of the principal documents used in the preparation of the Site Allocations document. This document is produced periodically to help demonstrate that the district has sufficient sites to

meet demand and it is a key evidence base for the Site Allocations document insofar as it considers the 'status' of all known sites within the district i.e. their availability, suitability and deliverability.

**Supplementary Planning Documents (SPD)**

Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites or on particular issues such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the formal development plan (see above).

**Sustainable Military Settlements**

RAF Lakenheath and RAF Mildenhall, where military air base development will be restricted to operational need including necessary related facilities.

**Sustainability Appraisal (SA)**

This is a tool for appraising policies to ensure that they reflect sustainable development objectives. An appraisal is required by legislation for all local plans and many SPDs.

**Tree Preservation Order (TPO)**

A tree preservation order is an order made by a local planning authority in England to protect specific trees, groups/areas of trees or woodlands in the interests of amenity.

**USAF**

United States Air Force.

**Windfall sites**

Sites which have not been specifically identified as available in the local plan process. They normally comprise previously developed sites that have unexpectedly become available.







## Forest Heath

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