

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

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

<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.
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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.

23591 - 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.

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3. Evidence of local housing needs				
3.2-3.4				
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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3.5-3.9				
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	<p>3.7</p> <p>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.</p> <p>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.</p>	<p>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.</p>	
23593 - Herringswell Parish Council (Su Field) [5165]	Object	<p>3.6</p> <p>The district is heavily constrained and would face significant challenges to even meet the lower housing target</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>
<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.	

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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 & 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.	

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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 & Lakenheath.</i></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>3.15</i>				
22837 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Object	<p>Given the about there might be more than two options for housing</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. 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.</p>	
23069 - Bedford House Stables (Luca Cumani) [12674]	Object	<p>With regards to section 3.12 it is not clear how the council considers there to be only 2 options for housing provisions</p>	<p>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.</p>	

<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 [12641]	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.	
23144 - 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.	
23152 - 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	

Representations

Nature

Summary of Main Issue/Change to Plan

Council's Assessment

Action

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>	

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		<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>		

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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	

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		<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>	

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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	

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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>	

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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>	

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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<50% of 496> 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>	<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.</p>	
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"> 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. 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. 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. 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. 	<p>A preference is expressed for option 2 which is noted. Other comments relate to the distribution which is addressed separately.</p>	

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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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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"> - 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.¹ 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. <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	

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		<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	

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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.	

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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>	
22936 - 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>	

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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>	
22928 - Mr Justin Wadham [12641]	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	

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

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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>	

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

<i>Representations</i>	<i>Nature Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<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"> may not have the desired effect of increasing AH if there is no demand for the market homes needed to deliver them; 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. <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 "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>	

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

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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.	
22776 - 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.	
23216 - Talavera Estates Ltd [12704]	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	
22938 - 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.	

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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</p> <p>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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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.	

<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>Flood Risk 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. 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>Water 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"> <input type="checkbox"/> achieve the overall 'good' status of waters <input type="checkbox"/> prevent deterioration and enhance the quality of the Water Environment <input type="checkbox"/> promote the sustainable use of water <input type="checkbox"/> reduce contamination <input type="checkbox"/> mitigate against the impacts of floods and droughts <input type="checkbox"/> create better habitats for people and wildlife <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>
		<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>		
22944 - Mrs Anita de Lotbiniere [6677]	Support	This chapter recognises the sensitive landscape and the other problems - aircraft noise and in particular that this may be affected by the expansion of Lakenheath Air Base following the closure of Mildenhall. It also acknowledges the large areas of flood zones and the archaeological, geological and historic features.	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>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 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>
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>				
23237 - 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.
23081 - 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.
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<i>Lakenheath</i>				
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.
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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> <ol style="list-style-type: none"> 1. limitations of present poor infrastructure - specifically in roads and services within the village. 2. The village has already experienced considerable recent growth, and there are already approved plans for further 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 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.
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<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.

Representations

Nature Summary of Main Issue/Change to Plan

Council's Assessment

Action

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.

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		<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>		

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	<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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		<p>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.</p>		

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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.

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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.

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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 [12521]	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.

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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.

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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	The information regarding Newmarket requires expansion in relation to the horse racing industry	<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.

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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.
22937 - 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.

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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.

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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.

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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.
22929 - Mr Justin Wadham [12641]	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.

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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"> land within Flood Zones 2 and 3 running north/south through the settlement; and Habitats Regulations designations for stone curlew. <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>	

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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.

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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.
22839 - 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	<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.
23075 - Bedford House Stables (Luca Cumani) [12674]	Object	NO See answer to question 3 for more detail	<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>
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.
22982 - 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	<p>No the constraints of Newmarket are very inaccurately recorded.</p> <p>See answer to question 3 for more detail</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.
22786 - Historic England (Mr Tom Gilbert-Wooldridge) [12636]	Object	<p>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.</p> <p>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.</p> <p><i>Greater reference to historic environment as environmental constraint is needed</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.
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.
23449 - 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 [4678]	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"> <input type="checkbox"/> AQMA issues <input type="checkbox"/> Landscape sensitivity <input type="checkbox"/> Impact on key facilities <input type="checkbox"/> Safety concerns <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 (Luca 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.
22932 - 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.
23577 - Rural Parish Alliance (Mr Bill Rampling) [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 Group (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>
5. Housing distribution options				
5.1-5.2				
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.
23200 - Mr & Mrs B Rolfe [12682]	Support	We support the categorisation of settlements and the inclusion of Beck Row as a Primary Village.	Noted.	None.
Core Strategy Policy CS1: Categorisation of Forest Heath Settlements table				
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>
<i>5.3-5.4</i>				
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.
<i>5.5-5.10</i>				
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.
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.

<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.
223063 - 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.
222950 - 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.
222952 - 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.

<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 - Focus on Newmarket, Mildenhall and Lakenheath</i>				
23190 - 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>	<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>
23174 - R J Upton 1987 Settlement Trust [12681]	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 on unconstrained land 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>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>	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.
23136 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	See Response to Question 5	<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.
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 [12631]	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.

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>
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.
22953 - RWS Ltd. [12659]	Support	<p>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</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.
22778 - The Unex Group (Mr Stephen Walsh) [5804]	Support	<p>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.</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.
22779 - Tap Investments Limited [12632]	Support	<p>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.</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 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.
23189 - 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.

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

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>	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.
23172 - 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>	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>
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>	<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>
23161 - Newmarket Horsemen's Group (NHG) [11392]	Object	<p>The NHG considers that significant residential development cannot be delivered in Newmarket without very significant detrimental impact on 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>

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.

<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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Question 4

<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>	<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 Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>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).</p> <p>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;</p> <ul style="list-style-type: none"> <input type="checkbox"/> Generally Natural England advise that 16ha of good quality semi-natural habitat is required per pair of stone curlew <input type="checkbox"/> Mitigation areas will need to be delivered in large blocks and attached to or linking existing areas of good quality semi-natural habitat <input type="checkbox"/> Will need to be secured with a long term management programme. <p>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.</p> <p>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</p>		

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		<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>		
23148 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [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>	<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>
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: 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.
22841 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	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"> 1 2 3 4 <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.
22575 - 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"> 1. Object - joint 4th place 2. Object - 3rd place 3. Support - 1st place (subject to satisfactorily addressing highway issues in Newmarket). 4. Object - joint 4th place (with the exception that Exning, as a primary village with capacity is appropriate for further allocation). 	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.
22614 - 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>
DOCUMENT				
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.

<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. They 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"> 1 2 3 4 <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"> <input type="checkbox"/> Environmental impact on the Brecks and other ecologically sensitive habitats <input type="checkbox"/> Flooding <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 <input type="checkbox"/> Analysis of the need for a relief road for Brandon post the dualling of the nearby A11 <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"> 1 2 3 4 <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.
23201 - Mr & Mrs B Rolfe [12682]	Comment	<ol style="list-style-type: none"> 1. Option 4 2. Option 2 3. Option 1 4. Option 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.
22964 - 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"> 1. option 3 2. option 2 4 = 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.

<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"> 1 2 3 4 <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"> 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.
22832 - Mr & Mrs TM & CA Gowing [12638]	Comment	<p>Our order of preference is</p> <ol style="list-style-type: none"> 1 2 3 4 <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. 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. 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>
23628 - Suffolk County Council (Mr James Cutting) [11903]	Comment	<p>HORSERACING AT NEWMARKET AND ITS HINTERLAND</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.

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
22715 - Mr & Mrs H D Scott [12611]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> 1 2 3 4 <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"> 1. Object - joint 4th place 2. Object - 3rd place 3. Support - 1st place (subject to satisfactorily addressing highway issues) 4. Object - joint 4th place 	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>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 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.
23206 - 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. * 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.

<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>

<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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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

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>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.</p>		
		<p>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)".</p>		
		<p>Very high development at Red Lodge is unsustainable when considering the current infrastructure and the economic opportunities for employment in this rural location.</p>		
		<p>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.</p>		
		<p>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.</p>		
		<p>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.</p>		
		<p>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</p>		

Representations

Nature

Summary of Main Issue/Change to Plan

Council's Assessment

Action

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.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22621 - Ms Sarah King [12596]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> 1 2 3 4 <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"> 1. joint least preferred - rank joint 4th 2. rank 2nd place 3. most preferred - rank 1st 4. joint least preferred - rank joint 4th 	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.
22625 - Ms Anna Wilks [12599]	Comment	<p>My order of preference is</p> <ol style="list-style-type: none"> 1 2 3 4 <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.

<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"> 1. Focus on Mildenhall, Newmarket and Lakenheath 2. Focus on Lakenheath, Red Lodge, with medium growth at Mildenhall and Newmarket 3. Focus on Red Lodge, Lakenheath and Mildenhall with lower growth in Newmarket 4. Focus on Mildenhall, Newmarket and Red Lodge with increased growth in primary villages <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.

<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.		
22816 - 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.

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

<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.
23038 - 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.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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>
22599 - 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 inrastructure. 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 [12572]	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 & Kentford as areas to see medium-high % house building in relation to current populations.</p> <p>The towns such as Newmarket, Mildenhall & 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>	<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>
		<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 Morrey) [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 constraints⁸ 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

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>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.</p>		
23542 - Moulton Parish Council (Mrs L Stone) [5222]	Comment	<p>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.</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>
22790 - Historic England (Mr Tom Gilbert-Wooldridge) [12636]	Comment	<p>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.</p>	<p>Comments are noted. There is no evidence to suggest that a higher level of growth at Brandon can be provided at this time.</p> <p>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.</p>	<p>None.</p>
22885 - Mrs Lucy Wadham [12642]	Comment	<p>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.</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>	<p>None.</p>

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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.
23618 - 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.

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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.
23230 - Jaynic Investments LLP [12521]	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.
23078 - Bedford House Stables (Luca 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 pre-requisite 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>	<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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		<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.
22958 - 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.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23451 - 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.
22922 - Hopkins Homes Ltd (Mr Chris Smith) [7694]	Object	<p>Comments/Objection to Question 5.</p> <p>See attached Document.</p> <p><i>Comments/Objection to Question 5.</i></p> <p><i>See attached Document.</i></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. 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.