

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

*Public Participation Report*

[About this document](#)

[About this document](#)

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***Representations***

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

***Council's Assessment***

***Action***

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***About this document***

*About this document*

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 These documents are over 6 years old and are considered out of date.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the IECA (2009) and the LDF Traffic Impacts document (2009); with supporting data using the 2001 Census, which is now out of date; and importantly traffic survey data that is now at least 6 years old compared with the industry standard 3 years.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

**Representations**

**Nature**

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

**Council's Assessment**

**Action**

consider improvement options;2

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

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

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

Comment

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

Comments noted.

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

Comment

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

Comment noted.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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## ***2. Policy background***

### ***2.1-2.3***

23096 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	See comments below about the inappropriate treatment of Lakenheath as a Key Service Centre and the uncertainty affecting Lakenheath as a result of RAF/USAF changes in operations at Mildenhall and Lakenheath. All allocations should be deferred pending the outcome of US and RAF operations at these locations. The point to make is that the uncertainty as to the use of Mildenhall could mean it becomes a large brownfield site suitable for housing within the plan period and the shift of operations to RAK Lakenheath will mean increased noise and safety considerations that impact on grown areas.	Comments noted.	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.
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## ***3. Evidence background***

### ***3.5-3.9***

23244 - Newmarket Horsemen's Group (NHG) [11392]	Comment	3.5 The Council states "It is essential that the SIR is underpinned by a robust evidence base in terms of what infrastructure is currently available and what will be required to deliver the revised growth strategy." However, as outlined above the evidence base is considered to be out of date.	.	
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### ***3.12-3.14***

23245 - Newmarket Horsemen's Group (NHG) [11392]	Comment	3.14 It is unclear how infrastructure requirements will be brought to the Council's attention when the survey work to identify the constraints is not up-to-date or available in some cases.	Comment noted.	The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations (including with transport and highways), and an update of the Water Cycle Study, and responses to the Issues and Options SIR and SALP consultations.
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#### ***4. Infrastructure requirements and constraints***

##### *4.1-4.3*

22792 - Historic England (Mr Tom Gilbert-Wooldridge) [12636]	Object	<p>The draft plan does not contain much discussion of the historic environment or heritage assets under infrastructure requirements and constraints in Section 4. The tables in Section 6 contain some reference to the heritage of specific settlements, but this does not appear to inform consideration of growth options and constraints. Having attended the workshop earlier in 2015, we would like to see greater consideration of the historic environment and the potential impact of growth on heritage assets.</p> <p><i>We would like to see greater consideration of the historic environment and the potential impact of growth on heritage assets.</i></p>	Comments noted.	The historic environment and heritage assets have been considered on a site by site basis and have informed selection of the preferred options for site allocations. Reference will be made, where relevant, in the next iteration of the IDP.
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22830 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Support	<p>Green infrastructure can support and enhance the environment and the health and well-being of residents. It helps to protect and restore naturally functioning ecosystems and provide a framework for development. Its key functions are:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Enriching habitats and decreasing fragmentation</li> <li><input type="checkbox"/> Maintaining natural landscape processes</li> <li><input type="checkbox"/> Protecting historic landscapes, archaeological and built heritage assets</li> <li><input type="checkbox"/> Helping mitigation of, and adaptation to, the effects of climate change</li> <li><input type="checkbox"/> Flood alleviation</li> <li><input type="checkbox"/> Improving air quality and attenuating noise</li> <li><input type="checkbox"/> Improving quality of life, health and well-being</li> <li><input type="checkbox"/> Providing opportunity for recreation and access</li> <li><input type="checkbox"/> Providing sustainable transport routes</li> <li><input type="checkbox"/> Local food production</li> <li><input type="checkbox"/> Contributing to a sense of place</li> </ul> <p>Since many of the settlements within the Forest Heath district have European and nationally designated sites nearby, from an ecological perspective it is important that each settlement contains sufficient greenspace to support local residents. By providing this local green space and ensuring there are areas nearby for activities such as dog walking, activity is diverted away from designated sites in the vicinity, which are likely to be put under increasing pressure due to the proposed housing provision within the district.</p> <p>In particular, settlements close to Breckland Special Protection Area (SPA) such as Lakenheath, which has no publicly accessible greenspace available that is not designated (Maidscross Hill is both a Site of Special Scientific Interest (SSSI) and a publicly accessible Local Nature Reserve), are particularly in need of non-designated green space to lessen recreational pressure on Breckland SPA. Note in the case of Lakenheath we are also concerned about the pressure on Maidscross Hill SSSI which highlights that SSSIs, where they are accessible to the public, can be damaged by high levels of recreation if there is not sufficient alternative greenspace available.</p>	Comments noted.	The council will continue to work closely with Natural England in progressing the SIR and SALP.

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

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



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		<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>		

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

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4.13-4.28

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

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

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

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

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



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

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

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

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

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

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

**Representations****Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action****5. Viability and infrastructure delivery****5.1-5.6**

23249 - Newmarket Horsemen's Group (NHG) [11392]

Comment

5.5 From the 2009 IECA the IDP identifies for Newmarket the Road Network and Public Transport as 'Fundamental' which is described as Infrastructure required to overcome development showstoppers; without it development could not occur; and must be provided up-front to support development. The IDP considers a number of key constraints for Newmarket including the congested A14 / A142 Junction; A14 and Railway physical boundaries; Impact on junction capacity in Newmarket; and Impact on horse movements. However, no up-front solutions have been identified to account for the increased growth figures.

Comment noted.

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

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>6. Infrastructure and service constraints, issues and priorities</b>				
<b>6.1-6.3</b>				
23811 - 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>	Comments noted.	The council will continue to work closely with the community, the Town Council, the Horse Racing Industry, Suffolk County Council and other stakeholders through the Newmarket Vision and Neighbourhood Plan.
23250 - Newmarket Horsemen's Group (NHG) [11392]	Comment	6.3 The Council has not published the results and findings of consultation with infrastructure and service providers in 2015. As such, it is impossible to comment on the appropriateness/validity of the conclusions drawn on such matters.	Comment noted.	The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers, including those responsible for transport and highways. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, and responses to the Issues and Options SIR and SALP consultations.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22831 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Support	In the existing infrastructure and opportunity tables it is clear that, although several settlements have sporting and indoor leisure facilities, there is little actual non designated greenspace. This is particularly apparent in Lakenheath, Kentford, West Row and Red Lodge. It is important to consider amenity grassland areas such as parks separately from defined facilities such as sporting facilities, allotments and play areas; many people simply need accessible green space to relax, walk and exercise their dogs, away from play areas and sporting facilities. We advise that the provision of accessible natural green space should be a priority for your authority, given how important this is to achieving a sense of place, for the health and wellbeing of residents and for the ecological reasons outlined above. There is also a need for defined walking and cycling routes in the district and we are pleased that improvements are already proposed for the Brandon and Newmarket areas. We hope this project will be extended to other areas in the district.	Comments and advice noted.	The council notes this advice and, where appropriate, has included in housing site allocation policies requirements for recreational and natural greenspace, green infrastructure, links between greenspaces and/or enhancements (see for example, Policy L2 Focus of Growth: North Lakenheath, in the SALP Preferred Options document).
<i>Lakenheath (key service centre)</i>				
23113 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	See comments above about the inappropriate treatment of Lakenheath as a Key Service Centre and the uncertainty affecting Lakenheath as a result of RAF/USAF changes in operations at Mildenhall and Lakenheath. All allocations should be deferred pending the outcome of US and RAF operations at these locations. The point to made is that the uncertainty as to the use of Mildenhall could mean it becomes large brownfield site suitable for housing within the plan period and the shift of operations to RAK Lakenheath will mean increased noise and safety considerations that impact on grown areas.	Response noted.	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site (or any consequential infrastructure requirements) in the Core Strategy Single Issue Review, the Site Allocation Local Plan or the Infrastructure Delivery Plan. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.
23108 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	Northbound junction from B1112 to A11 has been eliminated by the improvement works and requires car travel to go to Thetford via Brandon so the information stating improvements to links is incorrect.	Response noted.	Noted - the next draft of the IDP will be updated to reflect any changes and/or inaccuracies.

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

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

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

### *Section 106 Obligations (S106)*

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

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

### **8.1**

23092 - West Row Action Group (Mr John Smith) [12494]	Comment	It does make sense to target as much development as possible where the infrastructure already exists .	Comment noted.	
23242 - Meddler Properties Ltd [6654]	Comment	see attached	Comments noted.	The draft IDP is based on data known at the time of publication. However it is part of an iterative process of developing local plans. The council has undertaken and commissioned further research, and continues to engage with the main service and infrastructure providers, including those responsible for transport and highways. The next draft of the IDP that will accompany the SIR and SALP preferred options consultation documents will be informed by this continuing dialogue, technical consultations, and responses to the Issues and Options SIR and SALP consultations.
22738 - West Row Action Group (Mr John Smith) [12494]	Comment	It makes much more sense to target development where there is already the infrastructure . This not only cuts down the time and expense of delivering the housing but protects rural communities from over development .	Comment noted.	

***Representations******Nature Summary of Main Issue/Change to Plan******Council's Assessment******Action******Appendix D - Summary of infrastructure requirements******Appendix D - Summary of infrastructure requirements***

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

Comment

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

Comments noted.

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