Single Issue Review (SIR) of Core Strategy Policy CS7 - Overall Housing Provision and Distribution - Preferred Option (3rd Regulation 18 Stage)

Public Participation Report

1. What is this consultation about

Sustainability Appraisal and Habitats Regulations (Screening) Assessment

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
1. What is this consu	ltation d	about		
Sustainability Appraisal and	d Habitats	Regulations (Screening) Assessment		
24482 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG has submitted separate representations regarding the SA and HRA work, which it considers to be inadequate to justify this preferred options document.	Responses to the Sustainability Appraisal (SA) will be set out in the SA to accompany the SIR consultation.	no action required
2. The Single Issue R	eview p	rocess		
2. The Single Issue Review J	process			
24088 - Suffolk Constabulary (Ms Jackie Norton) [12810]	Comment	I would be please to work with any agent and/or a developer to ensure any future proposed development incorporates the required security elements. This is the most efficient way to proceed with residential and commercial developments and is a useful partnership approach to reduce the opportunity for crime and the fear of crime.	noted	no action required

What we have learnt so far

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
3. Setting an appropriate of the set of the	riate ho	using provision		
What we have learnt so far				
24485 - Newmarket Horsemen's Group (NHG) [11392]	Object	The table at 3.2 is identified as copy of the information provided at the Issues and options stage. It should be updated with the latest information on completions as at 31 march 2016. This information is not provided elsewhere in the document and is important in identifying the land necessary to allocate.	Comments noted. Commitments and completions to the 31st March 2016 are included within the updated SIR document.	Commitments and completions updated to the 31st March 2016.
24483 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG has submitted separate representations regarding the SA and HRA work, which it considers to be inadequate to justify this preferred options document.	Responses to the Sustainability Appraisal (SA) will be set out in the SA to accompany the SIR consultation.	no action required
Developing the preferred of	ption			
24487 - Newmarket Horsemen's Group (NHG) [11392]	Object	The updated evidence does not factor in the implications of the planned closure of RAF Mildenhall. the NHG considers that it should as it is likely to influence the level of housing required for the district.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24318 - Save Historic Newmarket Ltd (Ms Sara Beckett) [11232]	Object	Object - RAF Mildenhall's closure should be considered within the figures and impact on the district.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required

Developing the preferred option

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23977 - C J Murfitt Ltd (Mr Colin Murfitt) [12870]	Object	3.15-3.17 - OBJECT to the lower figure of 6,800 dwellings to be provided in the district over the plan period is too conservative when compared to the original OAN in the original Peter Brett report of 7000 dwellings (option 1) or 7700 (option 2) to take account of the needs for affordable housing.	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.	no action required
24119 - Newmarket Town Council (Mr John Morrey) [12910]	Object	3.15 - the updated evidence does not include the closure of RAF Mildenhall which will impact the housing figures for the District.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24326 - Mrs Rachel Hood [12509]	Object	Object as no allowance has been made for the closure of RAF Mildenhall will impact the housing figures for the District.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24471 - Talavera Estates Ltd [12704]	Object	3.16 - No we do not agree with the overall housing figure for the District. In response to the previous SIR Issues and Options report (2015) we responded that Forest Heath should plan for Option 2 which proposed 7,700 dwellings in the period 2011-2031 or 385 homes each year which included an uplift in affordable housing of 10% in the overall total. We therefore OBJECT to the revised housing figures in paragraph 3.16 and proposed Policy CS7a.	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.	no action required

Developing the preferred option

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24133 - John Gosden Racing LLP (Mr John Gosden) [12700]	Object	3.15 - OBJECT as no allowance has been made for the closure of RAF Mildenhall which will impact the housing figures for the District.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24092 - Breckland District S Council (Martin Pendlebury) [12898]	Support	Breckland welcomes Forest Heath's evolving stance regarding Brandon and RAF Mildenhall, which seems to reflect concerns previously expressed by Breckland Council and no doubt others.	noted	no action required
		We understand the continuing uncertainty around the future of RAF Mildenhall forces you to effectively exclude this site from contributing to deliverable development sites in the short term. So an early review once there is certainty over the future of RAF Mildenhall is supported.		
Overall Housing Provision	CS7a			
23971 - Mr Stephen Griffiths [12866]	Comment	We note there is an overall requirement of 6,800 dwellings in the period 2011-2031.	noted	no action required
24066 - Defence Infrastructure Organisation (Mr Paul South) [12907]	Comment	Please see attached representation	It is noted that the DIO anticipates the Noise Contours will be updated during the period covered by the Development Plan.	The 2015 MOD noise contour map is included in the SALP Reg 19 Local Plan

Overall Housing Provision CS7a

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24472 - Talavera Estates Ltd [12704]	Object	No we do not agree with the overall housing figure for the District. In response to the previous SIR Issues and Options report (2015) we responded that Forest Heath should plan for Option 2 which proposed 7,700 dwellings in the period 2011-2031 or 385 homes each year which included an uplift in affordable housing of 10% in the overall total. We therefore OBJECT to the revised housing figures in paragraph 3.16 and proposed Policy CS7a.	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.	no action required
Question 1				
24284 - Herringswell Parish Council (Mrs Su Field) [5165]	Comment	We are not surprised to see a fall in the overall housing number for our district and support a reduction, but we are still surprised that the amount of housing has only been reduced by 200 homes. It is fully anticipated that the closure of RAF Mildenhall will have begun to have made an impact before the end of the plan period (2031). At the same time, it is noted the overall housing need has only been reduced by 200 homes. 21.8% 1 of the housing stock is privately rented and the vast amount of that is to American personnel. Once this unique supply and demand for housing has been removed from our district with the removal of RAF Mildenhall, we can expect rental prices to have to fall with many of the rental properties being released onto the open market.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24353 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	The 10% uplift for affordable housing should be applied to the new OAN of 6800 dwellings. A target of 6800 dwellings in the period 2011 to 2031 is only 340 dwellings per year. This is only comparable to the average rate for the last 10 years so does not "boost significantly the supply of housing" in accordance with the NPPF paragraph 47.	An update to the SHMA was published in 2016 setting a revised overall OAN of 6800 dwellings from 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 to provide for adequate affordable housing.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23941 - Mr B Keane and Mrs L Planas [12852]	Comment	Broadly in agreement subject to comments on attached sheet	Comments noted - specific site allocations are dealt with within the SALP and not the SIR which addresses the broad locations for growth.	no action required
		This representation is being made on behalf of Mr B Keane and Ms L Planas in respect of adjacent sites being put forward jointly as a potential residential allocation.		
		These sites are on the southern side of Worlington Road on the western edge of Mildenhall and comprise Grove Farm and Rose Forge.		
		This representation should be read in conjunction with/cross-referred to similar representations on the same basis being made to the Site Allocations Local Plan.		
		The Respondents are broadly in agreement with the overall housing provision in terms of need and numbers as dealt with in Question 1 and with either of the Distribution Options 1 or 2 dealt with in Question 2.		
		However, they believe that the site the subject of these representations is more appropriate as an allocation to meet housing needs than a number of formal allocations in Mildenhall and particularly those being pursued under references MI(a) and M2(b).		
		In summary, MI(a) involves the substantial loss of agricultural land. There is no clearly defined urban edge.		
		The distance to and from facilities, principally within Mildenhall Town Centre are at some distance (further than the site the subject of these representations).		
		The numbers of dwellings to be brought forward and timescales are uncertain and all subject to the development of a Masterplan.		
		This site, even if pursued, will not therefore deliver dwellings for some considerable time.		
		With regards site M2(b), the delivery of this site is uncertain as it requires other development to take place and as such there are no dwelling numbers		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action	
		available as to what can be provided and no realistic timescales for the site being brought forward. As with site MI(a), this site will not deliver dwellings for some considerable time even if realised.			
		The site the subject of these representations is immediately adjacent to the urban edge of Mildenhall, is largely brown field/developed land, has the benefit of existing access arrangements, is flat and level and importantly is immediately available for residential development.			
		There are no known constraints to the immediate development of this site.			
		A location plan is attached showing the joint sites to be taken forward together (which is substantially reduced from the two sites when put forward in the earlier consultation exercise and assessed under references M/41 and M/42).			

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24214 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Comment	We are pleased that our comments on the issues and options have clearly been taken into account when formulating the current options. As stated previously, it is not within Natural England's remit to suggest which option put forward for housing distribution would be more appropriate. However we are satisfied that the environment has been taken into account in both options and note that the environmental constraints have all been described correctly within the settlement constraints section. However in order to increase housing in the area by 6800 between the plan period 2011-2031 it is our view that strategic measures should be put in place to mitigate for increasing levels of recreation in the district. We agree with the findings of the Accessible Natural Green Space Study that some settlements in the district lack greenspace provision. This is evidently leading to recreational pressure on designated sites, many of which act as the only available greenspace within a settlement, such as Maidscross Hill SSSI/LNR and Red Lodge Heath SSSI. Following helpful discussions with your authority, we consider that the best approach (and probably the only approach that would address the issue) would be to employ a warden to oversee these and other designated sites under pressure to ensure these sites remain able to support the local community. We are very happy to work with you on this strategy. Extending these sites to provide a larger, undesignated area of greenspace, would also be highly beneficial but we appreciate that this depends on being able to purchase the land adjacent to the sites. We have provided further comments on greenspace in our response on the Accessible Natural Greenspace in our response on the Accessible Natural Greenspace in our response on the Accessible Natural	The Council has updated the Accessible natural greenspace study evidence document and included a warden service to the suite of strategic measures recommended, that can be implemented to mitigate for increasing levels of recreation associated with the increase in housing. The Council will continue to work with Natural England to implement measures proportionate to the type, scale, and location of development in the plan. Consideration has been given to whether Maidscross Hill SSSI/LNR and Red Lodge Heath SSSI and Aspal Close can be extended, however there are currently no options that would facilitate this. The stone curlew nest attempts data is now available at http://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/Stone-Curlew-Buffers-in-the-Brecks-document-210716.pdf Revised stone curlew nest attempts information to be used as evidence to support the SIR and the associate HRA Comment about the strategic land use planning solution is noted and welcomed. It is considered that the Forest Heath Local Plan will not compromise the implementation of a strategic solution and existing policies in the Development Management Document in particular DM10, DM11 and DM12 allow measures for the mitigation of impacts on biodiversity to be secured including through planning obligations. The inclusion of a reference in the Single Issue Review of Core Strategy CS7 is not considered necessary and would not be appropriate in planning terms. The Council is committed to working with Natural England and adjacent local authorities to implement the strategy when more information is available.	no action required
			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.	

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23959 - Mrs W Vale [12861]	Comment	However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required
24152 - Gladman (Mr Russell Spencer) [6673]	Comment	It must be made clear that any housing requirement set out in policy CS7 is a minimum figure and not a ceiling for development. Gladman highlight that the 2014-based household projections are due to be released in July 2016 so any assessment of the district's housing requirement will need to be updated to be based on the latest projections. Further, Gladman would urge Forest Heath to consider the findings of the Local Plan Expert Group which, if implemented, will have an impact on how the housing requirement for the district is to be calculated. It is our understanding that a majority of the SHMAs that were prepared under the current guidance on SHMA preparation are not Framework compliant and do not consider the full range of factors that are outlined in paragraph 159. This is causing significant problems for authorities currently at Examination and therefore, to avoid this issue, SHMAs should be updated to take account of the Framework and ensure plans are based on robust and up-to-date evidence. Indeed, the Government have noted the deficiency in SHMAs and are updating the guidance on SHMA preparation to fully reflect the guidance given in the Framework. Gladman reserve the right to adduce further evidence on OAN at the appropriate time.	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure .	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23951 - Mr & Mrs H Moazzeni [12860]	Comment	However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required
23972 - Mr Stephen Griffiths [12866]	Comment	We note there is an overall requirement of 6,800 dwellings in the period 2011-2031.	noted	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24355 - Merlion Capital [12926]	Comment	We do not consider in principle that there is reason to object to the Council's approach to establishing its objectively assessed need and the testing of that figure will ultimately be for a future Inspector to determine. We however note that between the 2013 SHMA and the recent update in January 2016, that there has been very little overall change in the figures, with these only slightly reducing from 7,000 to 6,800 for the period 2011-2031. Our only area of concern regarding the OAN is in respect of the Council's considered change in 'local circumstances' they express relating to a planned closure of the RAF Mildenhall airbase. In relation to this issue, we note that the announcement on 18th January 2016, only set out that the USAF would leave the site by 2022. Given the timescales of the CS SIR / SALP, it seems highly unlikely that any certainty regarding deliverability and timescales for bringing the site forward will be obtained prior to the adoption of these documents. As such, we consider that the recent SHMA update correctly considers any potential impact associated with the closure of RAF Mildenhall to be "too uncertain to make a confident adjustment to the official demographic projection" and we therefore support its decision to not make any adjustment, particularly given the likely complexities involved in desegregating the impacts of a resulting expansion of Lakenheath and the additional effects in respect of employment. Whilst we support the overall OAN of 6,800 dwellings over the plan period 2011-2031, we do not however agree with the SALPs position to only allocate housing to just about cover this figure. The reasoning for this objection is discussed in our response to Question 2 below.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24065 - Defence Infrastructure Drganisation (Mr Paul South) 12907]	Comment	Your web site does not allow me to indicate that this is a representation made by Ministry of Defence. It also only allows me to confirm that I am acting on behalf of myself (which is not the case) - otherwise it will not accept the representation.	Your details (as acting on behalf of MOD) are registered on our system. Comments entered during this round of consultations were received and noted. Should assistance be required to enter comments in the next round of consultations please contact us.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24076 - Lord Derby [5831]	Comment	No comment	noted	no action required
23949 - Mr & Mrs R Lewis [5666]	Comment	broadly in agreement subject to comments below However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required
24328 - Mrs Rachel Hood [12509]	Object	No I do not agree with the overall housing figure for the district. the closure of RAF Mildenhall and the resultant freeing up of USAF personnel rented homes in the district has not been taken into account when deciding on the number of homes still needed in the district. I therefore feel that the figure of 6800 homes required for the district is too high and should be reassessed. I therefore think that no decision can be made on the housing numbers within the plan period of 2031 until the outcome of RAF Mildenhall is known. This site will come forward within the plan period and is expected to be available from 2021.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24071 - Hills Residential Ltd Obje [12651]	Object	The current plan is unsound as it is neither justified nor positively prepared. In order to meet affordable housing needs the plan target should be increased to a minimum of 7,600 homes. See attached supporting documents which form part of these representations.	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure .	no action required
		In order to meet affordable housing needs the plan target should be increased to a minimum of 7,600 homes. See attached supporting documents which form part of these representations.		
24005 - Necton Management Ltd [12888]	Object	Necton Management does not support the Council's reduced provision for 6800.	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously	no action required
	The identified affordable housing need of 2638 dwellings is higher than can be delivered through the application of adopted Policy CS9 as the 6800 figure would only deliver 2040 affordable homes.	therefore it is appropriate to plan for the updated		
		An increase in the in the total housing figures included in the local plan should be considered as this would help to deliver the required number of affordable homes.		
		The SIR Policy CS7a is as risk of being found unsound as the adopted policy requirement of 30% affordable housing expressed as a percentage of the overall housing provision is insufficient to deliver the full objectively assessed requirement for affordable housing.		
		Additionally, the Council's assessment of its housing land supply includes a major site for development of 400 dwellings at hatchfield Farm. That site is subject to a called-in appeal and cannot realistically be considered as available at the present time.		
		Similarly the SALP identifies a site at land north of Red Lodge that will require Appropriate Assessment under the Habitats Regulations. This introduces some uncertainty as to whether that site would realistically be available and suitable for development in the plan period.		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24309 - Tattersalls Ltd (Mr John Morrey) [5726]	Object	No, Tattersalls does not agree with the overall housing figure of 6,800 for the district, as within the plan period RAF Mildenhall will close. This will have a significant impact on the area and in particular will influence the housing market and need. It is inappropriate to dismiss RAF Mildenhall due to the uncertainty of the exact date it will become available and Tattersalls believe that FHDC should identify the implications of the closure of RAF Mildenhall on the housing need now.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24470 - Talavera Estates Ltd [12704]	Object	No we do not agree with the overall housing figure for the District. In response to the previous SIR Issues and Options report (2015) we responded that Forest Heath should plan for Option 2 which proposed 7,700 dwellings in the period 2011-2031 or 385 homes each year which included an uplift in affordable housing of 10% in the overall total. We therefore OBJECT to the revised housing figures in paragraph 3.16 and proposed Policy CS7a.	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.	no action required
23979 - C J Murfitt Ltd (Mr Colin Murfitt) [12870]	Object	No because we are not convinced that there is sufficient new evidence to justify a reduction in providing 7700 new dwellings	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure.	no action required
24121 - Newmarket Town Council (Mr John Morrey) [12910]	Object	NO The council's figure of 6,800 new homes across the whole district by 2031 does not take into account the impact of the closure of RAF Mildenhall on the housing market or how the departure of USAF service families will free up existing properties in the area. It is NTC's opinion that no decision can be made on the housing numbers within the plan period of 2031 until the outcome of RAF Mildenhall is known. This site will come forward within the plan period and is expected to be available from 2021.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required

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24443 - Crest Nicholson (Eastern) [11393]	Object	Crest Nicholson does not support the proposed total housing figure for the District of 6,800 dwellings for the Plan period to 2031. This is even lower than the smaller (7,000 dwellings)of the two figures presented at the last consultation stage, where Crest Nicholson supported the higher of the two - 7,700 dwellings for the Plan period. The final paragraph of our response to Question 1 of the October 2015 consultation stated as follows: "Crest Nicholson acknowledges the extent of the environmental constraints on development in the District, 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". This remains our view.	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure	no action required
23997 - Meddler Properties Ltd [12884]	Object	We would urge the Council to properly consider a greater overall housing requirement in order meet affordable housing needs.	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure .	no action required
		Properly consider a greater overall housing requirement in order meet affordable housing needs.		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24185 - Animal Health Trust [4678]	Object	AHT does not support the proposed total housing figure for the District of 6,800 dwellings for the Plan period to 2031. The final paragraph of our response to Question 1 of the October 2015 consultation stated as follows: "AHT acknowledges the extent of the environmental constraints on development in the District, 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". This remains our view. We consider that the Council's approach to total housing provision to be inconsistent with paragraph 47 of the NPPF. The first bullet point states that "[local planning authorities should] use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area" [Eclipse Planning Services emphasis].	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure .	no action required
24320 - Save Historic Newmarket Ltd (Ms Sara Beckett) [11232]	Object	No, the closure of RAF Mildenhall should be taken into account to allow for the release of their housing to be taken into the assessment of figures. The plan period is 2031 the future of RAF Mildenhall will be known well before that.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24430 - R J Upton 1987 Settlement Trust [12681]	Object	The Landowner does not support the proposed total housing figure for the District of 6,800 dwellings for the Plan period to 2031. This is even lower than the smaller (7,000 dwellings) of the two figures presented at the last consultation stage, where the Landowner supported the higher of the two - 7,700 dwellings for the Plan period. The final paragraph of our response to Question 1 of the October 2015 consultation stated as follows: "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".	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure .	no action required
24221 - Mr Richard Ward [12917]	Object	RAF Mildenhall should be included	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24107 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Object	No. Council has not factored in either closure of RAF Mildenhall or lower immigration and possibly lower growth due to exit of EU after last weeks referendum.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24135 - John Gosden Racing LLP (Mr John Gosden) [12700]	Object	No I do not agree with the overall housing figure for the district. The closure of RAF Mildenhall and the resultant freeing up of USAF personnel rented homes in the district has not been taken into account when deciding on the number of homes still needed in the district. I therefore feel that the figure of 6800 homes required for the district is too high and should be re assessed. I therefore think that no decision can be made on the housing numbers within the plan period of 2031 until the outcome of RAF Mildenhall is known. This site will come forward within the plan period and is expected to be available from 2021.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24306 - Elveden Farms Ltd [12921]	Object	Provision for a higher number of dwellings should be made over the plan period in order to address the affordable housing need and accommodate the general growing housing needs of the area. Provision for a higher number of dwellings should be made over the plan period in order to address the affordable housing need and accommodate the general growing housing needs of the area.	Noted. The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure .	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24499 - Newmarket Horsemen's Group (NHG) [11392]	Object	NO - The Council's housing requirement does not factor in the implications of the closure of RAF Mildenhall. The NHG considers that this is a significant impact on the local area that will influence the housing market and ultimately local housing need. It is right for the assessment of need to take this into account. It is not appropriate for the Council to suggest that it cannot take this into account given the perceived uncertainty about the date the site will be released. The NHG considers that the MoD has made it clear that the site will be released and the USAF has made it clear that it will vacate the site by 2022. The Council should identify the implications for housing need now not later in the plan-making process. The housing target will feature in the plan after RAF Mildenhall is closed as will the housing that the plan seeks to deliver. The NHG does not believe that the update work has adequately taken this issue into account.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24101 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Object	We do not agree that the figure for new homes is correct. What about RAF Mildenhall when it closes. You have made no comment on this. You must factor this matter in.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24448 - Pigeon Investment Object Management Ltd [7169]	Object	We object to policy CS7a "Overall Housing provision." The overall housing provision for the District should be expressed as a minimum figure. The policy should include a commitment to an early review of the plan to ensure that housing is delivered.	The overall housing figure is expressed as a minimum figure.	no action required
		plan numbers should be set as minimums in order to particularly assist in the delivery of affordable housing.		
		With new wording underlined Policy CS7a should be amended to read:		
		Provision will be made for a minimum of 6800 dwellings in the district over the plan period 2011 to 2031. The plan will be subject to an early review no later than three years from adoption.		
24183 - Ms Sara Beckett [6689]	Object	The Council has not taken into account the availability of RAF Mildenhall which will be available within the plan period of up to 2031. So much has been wrong in the past with data and figures why rush through without taking this into account when it is so important to get this right for the future	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
		The availability of RAF Mildenhall should be included.		
24298 - Jaynic Properties Ltd [12521]	Support	Jaynic Properties Ltd agrees with the overall housing figure for the District of 6800 dwellings. They also support the uplift for affordable housing as well as the additional dwellings proposed, as they note that the need for affordable housing will not be met.	noted	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24021 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Support	Yes across the district but not until the outcome of the housing provision is known for the extant RAF Mildenhall. As a Brown field site it is most suited to housing development. If this cannot be considered then the three market towns, Newmarket, Mildenhall and Brandon offer the best opportunity for development across the district - Brandon having available brownfield sites in and around the town, which seem to have been discounted as potential opportunities to support development. Mildenhall will have available new land once the Mildenhall Hub area is agreed.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
23990 - East Cambridgeshire District Council (Mr Richard Kay) [12883]	Support	Question 1 Response: ECDC supports in principle your intention to accommodate in full, the OAN of 6,800 dwellings.	noted	no action required
23975 - Mr Stephen Griffiths [12866]	Support	yes	noted	no action required
23887 - West Suffolk Councils (WSC Housing Development and Partnership) [12654]	Support	While the Strategic Housing Team would ideally favour an uplift on the 6,800 figure so as to deliver a higher overall supply of affordable housing nearer to the 2,638 projection identified within the SHMA 2014 update (http://www.cambridgeshireinsight.org.uk/ForestHeath _OAN-Update-2016), we recognise this would create an overall supply in excess of the OAN. We appreciate that there is no excess requirement stemming from any other authority within the Cambridgeshire Sub Regional area needing to be met in Forest Heath and so we understand that an uplift would present an over-supply in absolute terms. Therefore, we support the overall figure of 6,800.	noted	no action required
24061 - Mr Gerald Ball [5741]	Support	This is a complex situation with several moving and uncertain issues as described above which the expertise within the planning department will deliver successfully.	noted	no action required

Representations Natur	re Summary of Main Issue/Change to Plan	Council's Assessment	Action
24388 - Mrs Anita de Lotbiniere Support [6677]	t SIR of CS7 Point 1 In response to this, I write strongly to support the proposed level of housing provision for Brandon given the identified OAHN and the environmental constraints identified. Brandon already has spare capacity of empty houses and in view of the potential reduction of the military needs of USAF would not need to increase capacity to cater for an increased need.	noted	no action required

4. Housing distribution

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
4. Housing distributi	on			
4. Housing distribution				
23973 - Mr Stephen Griffiths [12866]	Comment	Housing distribution: we note that Moulton is identified as a secondary village but it has a primary school and a village shop.	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.	no action required
24067 - Defence Infrastructure Organisation (Mr Paul South) [12907]	Comment	Please see the attached representation	It is noted that the DIO anticipates the Noise Contours will be updated during the period covered by the Development Plan.	The 2015 MOD noise contour map is included in the SALP Reg 19 Local Plan
What do the comments tell	us?			
24474 - Talavera Estates Ltd [12704]	Comment	4.6 - Support for this settlement hierarchy was also supported in the consultation responses to the SIR Issues and Options stage document, as detailed in paragraph 4.6 of the latest SIR. However, under both of the proposed Options only 2% of growth is planned in Brandon which is the lowest percentage of growth in the whole hierarchy despite it being a market town, at the top of the hierarchy.	No further evidence has been presented through the 2016 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.	no action required
What we have learnt from t	he evidenc	ee base		
24134 - John Gosden Racing LLP (Mr John Gosden) [12700]	Object	4.8 - OBJECT - the AECOM traffic study is not up to date and does not reflect current traffic conditions.	Comments Noted. An updated AECOM Traffic study is due to be published in November 2016.	no action required
			This demonstrates that the distribution in the SIR can be achieved with highways mitigation and sustainable transport measures.	
24327 - Mrs Rachel Hood [12509]	Object	Object the AECOM traffic study is not up to date and does not reflect current traffic conditions.	Comments Noted. An updated AECOM Traffic study is due to be published in November 2016.	no action required
			This demonstrates that the distribution in the SIR can be achieved with highways mitigation and sustainable transport measures.	

What we have learnt from the evidence base

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24120 - Newmarket Town Council (Mr John Morrey) [12910]	Object	4.8 - Object - there do not appear to be any recent traffic surveys and the AECOM traffic study does not reflect current traffic conditions.	Comments Noted. An updated AECOM Traffic study is due to be published in November 2016. This demonstrates that the distribution in the SIR can be achieved with highways mitigation and sustainable transport measures.	no action required
24488 - Newmarket Horsemen's Group (NHG) [11392]	Object	There is reference to an updated AECOM Transport Study update 2016 which was produced after the updated IDP and the preferred options meaning that it could not have informed the preferred options exercise. The NHG has submitted separate comments on this in connection with the IDP. The NHG considers that insufficient transport evidence has been gathered to demonstrate the appropriateness of the preferred options.	Comments Noted. An updated AECOM Traffic study is due to be published in November 2016. This demonstrates that the distribution in the SIR can be achieved with highways mitigation and sustainable transport measures.	no action required
24319 - Save Historic Newmarket Ltd (Ms Sara Beckett) [11232]	Object	Object - the aecom traffic study is not a true reflection of the reality to Newmarket as it is out of date.	Comments Noted. An updated AECOM Traffic study is due to be published in November 2016. This demonstrates that the distribution in the SIR can be achieved with highways mitigation and sustainable transport measures.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
4.10				
24369 - Suffolk County Council (John Pitchford) [12927]	Comment	Education: As very few additional units are proposed, the existing two primary schools will be able to meet the demand from any residual population growth. However any significant development in the future would require a site for a new primary school. There is sufficient capacity at the Free School for secondary aged students. Early Years and Childcare: There are 5 providers (including 2 Childminders) and there is a deficit of 6 places. Therefore for a total of 125 dwellings, this would result in approx 13 children arising, so, at current values, a contribution of £79,183 would be sought tp provide adequate facilities.	noted	no action required
		Transport: The relief road for Brandon remains in the Local Transport Plan as a long term aspiration. However, without enabling development, which seems unlikely with the impact of environmental constraints, its construction is not currently		

4.10

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24008 - Mr William Bishop [5524]	Comment	 The things that concern me are. 1. The very small number of dwelling listed as acceptable is far two small . about approx.80-100 up to year 2031. Brandon has always been number 3 on the housing for development list for the Local Plan. In year the number was 791 units and in year 2012 790 units. 2. The population growth is continuing to rise Year 2001 8256 Year 2014 9425 an increase of 150 per Year so in Year2031 Brandon could have extra 1650 on the Electorial Role plus the fact that Brandon Has a Large Migration Intake 3. There is in Brandon. A large increase in Pupils numbers. Glade School has just added 4 new classrooms and needs more. A Planning for 4 new Classrooms is in place with FHDC now. Breckland School in currently ready to submit an application for extra Classrooms. The number of Pupils attending the 3 schools is over 1000 Pupils 4. FHDC were very good in helping a Company named OMAR HOMES to enlarge their Buisness. As a result there will be an increase in the Staff of at least 100 which will require extra accomdation 5. The Mildenhall Air Base will be closing down soon and many of the Staff will be working at The Lakenheath Base and will be looking for accommodation in Brandon. 6. Whilst I am a great supporter of Bird Life I have not Ever seen any evidence that all the Site . if built on, would result in harm to the Birds such as The Stone Curllew. 7. Some of the Sites, Shown in Brandon would not be suitable but there are others that should be considered the Site on the Road A1065 leading into Brandon from the direction of Mildenhall on the left had side could well be the answer for most of the shortage The Green Road has an Airflight Line from USAF Lakenheath and should not be considered 	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24047 - Norfolk County Council (Ms Laura Waters) [11365]	Comment	Norfolk Council will expect to work closely with adjoining authorities on the delivery of major infrastructure with particular focus at Brandon.	noted	no action required
		Whist paragraph 4.10 explains there is very limited capacity for growth in and around Brandon Norfolk County Council are working/will work closely with adjoining authorities on the highways and education infrastructure associated with any proposed development at Brandon.		
24476 - Talavera Estates Ltd [12704]	Object	OBJECT to paragraph 4.10 of the SIR which does not offer a review of the Local Plan in light of the submitted Brandon planning application, and we OBJECT to the Options for growth given that they do not give sufficient weight to adopted Policy CS1.	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.	no action required
24390 - Mrs Anita de Lotbiniere [6677]	Support	Para 4.10 - I strongly support the conclusion on the constraint for Brandon for the reasons stated.	noted	no action required
Implications for the options	7			
24094 - Breckland District Council (Martin Pendlebury) [12898]	Support	Breckland Council notes that Forest Heath District Council's stance on the regeneration of Brandon and provision of a relief road continuers to evolve. Breckland District Council welcomes Forest Heath District Council's acknowledgment within its Single Issue Review of the significant environmental constraints around Brandon, especially given its proximity to the Brecks and the nearby village of Weeting within Breckland Council's administrative area.	noted	no action required

4.11

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
4.11				
24371 - Suffolk County Council (John Pitchford) [12927]	Comment	Education: A site for a new primary school will be required to meet any additional demand from new housing. The existing two schools are already at capacity and cannot meet any additional demand. The most logical site would be associated with the proposed Mildenhall Hub development to relocate the College onto one site. Expansion of the College would be possible on this site but significant growth in both Mildenhall and Red Lodge is likely to generate the need for new secondary provision. The site for a new secondary school could be identified in either community.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation.	The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.
24373 - Suffolk County Council (John Pitchford) [12927]	Comment	Early Years and Childcare: There are existing 9 providers (including 6 Childminders) and there are currently 81 places. An increase 1,527 would result in approx 153 children arising. If we deduct the 81 places we have this would leave a contribution required for 72 children. Therefore a new provision would be required. A new brick building would cost at current levels in the region of £857,600 plus land costs.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation.	The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.
24377 - Suffolk County Council (John Pitchford) [12927]	Comment	Libraries: The intention is to re-locate the library as part of the Mildenhall Hub proposals RAF Mildenhall: The uncertainty of the future of the airbase and in particular whether any part or all of the site will be available for development means that any strategy proposed in this document needs to be sufficiently robust to accommodate further growth in the future. This applies overall to the pattern of development and the proposals for infrastructure to accompany the growth in the plan.	comments noted	The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24376 - Suffolk County Council (John Pitchford) [12927]	Comment	Transport: The scale of development being proposed for the town, and in particular the consequences for the town centre of significant development west of the town leaves a question of how this would be accommodated within the existing highway network. (Further details included under comments on site M1a on Site Allocations Document.) At present there has not been an adequate and viable solution proposed and further work will be necessary to identify if there is a scheme that achieves this. Further consideration would also need to be given to the impact on the Fiveways Junction of the A11.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation. The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	no action required
24489 - Newmarket Horsemen's Group (NHG) [11392]	Object	The document should acknowledge that the constraint imposed by the noise of aircraft at RAF Mildenhall is a temporary one given the planned closure of the base. The document suggests that this is a permanent constraint.	Comments noted. USAFE have indicated their intention to withdraw from RAF Mildenhall by 2023 and it is anticipated that the Noise Contours will be updated during the period covered by the Development Plan.	The 2015 MOD noise contour map is included in the SALP Reg 19 Local Plan
Implications for the options	3			
24490 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG considers that the council has sufficient certainty over the release of RAF Mildenhall for development to enable it to factor it into this plan- making process. The council should be considering scenarios for this site now so that the plan-making process does not become out-of-date before it is even adopted.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
24093 - Breckland District Council (Martin Pendlebury) [12898]	Support	We understand the continuing uncertainty around the future of RAF Mildenhall forces you to effectively exclude this site from contributing to deliverable development sites in the short term. So an early review once there is certainty over the future of RAF Mildenhall is supported.	noted	no action required

4.12

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
4.12				
24379 - Suffolk County Council (John Pitchford) [12927]	Comment	Education: The existing schools are near to capacity and are on sites that will not easily sustain further expansion. It will be necessary to secure a new site for an additional primary school within the new development. Early Years and Childcare: There are 10 providers (this includes 3 Childminders) and there is currently a deficit of 6 places. An increase 968 dwellings would result in approx 97 children arising. Therefore a new provision would be required. A new brick build would cost at current levels in the region of £857,600 plus land costs.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation. The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	no action required
24484 - Barley Homes (Group) Ltd (Kim Langley) [12932]	Comment	Please see attached some land identified at Studland's Park, Newmarket that Barley Homes have identified for a potential residential development.	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.	no action required
			Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable distribution has been developed.	
24381 - Suffolk County Council (John Pitchford) [12927]	Comment	Transport: Significant expansion associated with the current proposal for Hatchfield Farm would require improvements to the A142/A11 junction. More broadly, the County Council re-emphasises the comments that it previously made on transport in Newmarket and which are set out in the text below para 7.12 of the Site Allocations Local Plan document, and in particular the need to consider the impact of additional traffic on horse movements within the town.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation. The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	no action required
		Libraries: The County Council is seeking to relocate the existing library facility.		

4.	12
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Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24492 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG considers that the transport limitations of Newmarket mean that it cannot be considered to be a sustainable location to support substantial new housing development. The highway issues in Newmarket are well documented in the council's own evidence and yet the council has failed to full assess the situation in Newmarket. At the very least the traffic issues should be noted in this paragraph. The 2015 Deloitte Report - commissioned by the council - noted the need for further research into this area and yet the evidence base suggests that this has still not been undertaken. Investment into transport infrastructure has potential to enhance sustainability of Newmarket. The NHG considers that this means that the development at Hatchfield Farm cannot be delivered until transport infrastructure is improved.	Comments Noted. An updated AECOM Traffic study is due to be published in November 2016. This demonstrates that the distribution in the SIR can be achieved with highways mitigation and sustainable transport measures.	no action required
24491 - Newmarket Horsemen's Group (NHG) [11392]	Support	The NHG is pleased to see the acknowledgement of the importance of the horse-racing industry and the need to 'carefully manage' the movement of horses when considering other development.	noted	no action required
Implications for the options	1			
24493 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG has already submitted evidence to demonstrate that 400 homes on Hatchfield Farm will have a detrimental impact on the horse racing industry and the movement of horses. It considers also that 800 homes on that site will have an even greater impact. It does not consider that it is appropriate to consider either option for this sight in light of the evidence that it has provided. The absence of alternative sites in Newmarket is not justification for the development of an inappropriate site. The evidence base demonstrates that this has not been properly assessed.	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required

4.13

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
4.13				
24382 - Suffolk County Council John Pitchford) [12927]	Comment	Education: The existing primary school is full and cannot be extended further as the site is very restricted. The County Council is currently trying to secure a new site for a second primary school to open in September 2018. This site will have to be big enough to support further expansion to meet any additional demand from further planned development. Early Years and Childcare: There are currently 4 providers (including 1 childminder) and there are currently 56 places available. An increase of 876 dwellings would result in approx 88 children arising. Therefore provision for 30 children is needed. A new provision would be required. A new brick build would cost in the region of £606,350 plus land costs at current levels.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation. The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	no action required
24383 - Suffolk County Council (John Pitchford) [12927]	Comment	Transport: A cumulative traffic study has been undertaken by AECOM which looks at the impact of various scales of development in the settlement - 226; 420; 1465; and 2215 dwellings. This identified various improvement measures that would be required at particular junctions in the vicinity of Lakenheath. However a further iteration of this study would be required to identify the improvements needed to meet the scale of growth now proposed of 876 dwellings. Libraries: To respond to household and population growth, the County Council would seek to relocate the library to a multiple-use facility if an opportunity was available	Comments Noted. An updated AECOM Traffic study is due to be published in November 2016. This demonstrates that the distribution in the SIR can be achieved with highways mitigation and sustainable transport measures.	no action required
24018 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	Classification of Lakenheath as a Key Service Centre.	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.	no action required

4.14

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
4.14				
24384 - Suffolk County Council (John Pitchford) [12927]	Comment	Education: The County Council is in the process of buying a site for a new primary school which should open in September 2018. This will have the capacity to expand to meet the demand from the proposed housing. Additional secondary provision may be required to meet demand as described in the comments on Mildenhall above. Early Years and Childcare: There are currently 3 providers (no Childminders) with 6 places available. An increase of 1,654 dwellings would result in approx 166 children arising. This means places are required for 159 children. Therefore 2x separate new provisions of 60 places each. Each costing in the region of £857,600 plus land costs at current levels.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation. The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	no action required
24385 - Suffolk County Council (John Pitchford) [12927]	Comment	Libraries: Red Lodge is not at present served by a library. Given the scale of development taking place here the County Council is looking to opportunities to provide a base in the future, preferably in a multi-use facility. Funding through developer contributions will be important.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation. The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	no action required
4.15				
24387 - Suffolk County Council (John Pitchford) [12927]	Comment	Education: Plans are currently in hand to extend the primary school by relocating the community facilities.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation. The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
4.16				
24389 - Suffolk County Council (John Pitchford) [12927]	Comment	Education: The current primary school could be extended further.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation.	no action required
			The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	
24494 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG is disappointed to note that the Council has not identified the horse-racing industry and the movement of horses as a constraint to development	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation.	no action required
		in this settlement despite its previous representations.	The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	
4.17				
24392 - Suffolk County Council (John Pitchford) [12927]	Comment	Education: Further provision will be made at Moulton Primary School	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation.	no action required
			The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	
4.18				
24393 - Suffolk County Council (John Pitchford) [12927]	Comment	Education: The current primary school could be extended further.	The infrastructure requirements for each settlement are set out within the IDP which will accompany the SIR consultation.	no action required
			The council will continue to work with Suffolk County Council in the preparation of the SIR and accompanying IDP.	

Reasonable distribution alternatives

Representations N	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
Reasonable distribution altern	natives			
23970 - Anglian Water (Ms Sue Co Bull) [11226]		Anglian Water, in response to an earlier consultation on this matter (October 2015) advised on the ability to serve the scale of growth being considered. Overall , depending on the distribution of growth, 6800 dwellings in the district over the plan period 2011-2031 does not pose any overriding constraints. Anglian Water will continue to work with Forest Heath and developers to determine the infrastructure requirements to accommodate the growth and have no preference to the two distribution options suggested.	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.	no action required

Reasonable distribution alternatives

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23940 - Mr B Keane and Mrs L C Planas [12852]	Comment	Broadly in agreement subject to comments on attached sheet	Comments noted - specific site allocations are dealt with within the SALP and not the SIR which addresses the broad locations for growth.	no action required
		This representation is being made on behalf of Mr B Keane and Ms L Planas in respect of adjacent sites being put forward jointly as a potential residential allocation.		
		These sites are on the southern side of Worlington Road on the western edge of Mildenhall and comprise Grove Farm and Rose Forge.		
		This representation should be read in conjunction with/cross-referred to similar representations on the same basis being made to the Site Allocations Local Plan.		
		The Respondents are broadly in agreement with the overall housing provision in terms of need and numbers as dealt with in Question 1 and with either of the Distribution Options 1 or 2 dealt with in Question 2.		
		However, they believe that the site the subject of these representations is more appropriate as an allocation to meet housing needs than a number of formal allocations in Mildenhall and particularly those being pursued under references MI(a) and M2(b).		
		In summary, MI(a) involves the substantial loss of agricultural land. There is no clearly defined urban edge.		
		The distance to and from facilities, principally within Mildenhall Town Centre are at some distance (further than the site the subject of these representations).		
		The numbers of dwellings to be brought forward and timescales are uncertain and all subject to the development of a Masterplan.		
		This site, even if pursued, will not therefore deliver dwellings for some considerable time.		
		With regards site M2(b), the delivery of this site is uncertain as it requires other development to take place and as such there are no dwelling numbers		

Reasonable distribution alternatives

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
		available as to what can be provided and no realistic timescales for the site being brought forward. As with site MI(a), this site will not deliver dwellings for some considerable time even if realised.		
		The site the subject of these representations is immediately adjacent to the urban edge of Mildenhall, is largely brown field/developed land, has the benefit of existing access arrangements, is flat and level and importantly is immediately available for residential development.		
		There are no known constraints to the immediate development of this site.		
		A location plan is attached showing the joint sites to be taken forward together (which is substantially reduced from the two sites when put forward in the earlier consultation exercise and assessed under references M/41and M/42).		
24495 - Newmarket Horsemen's Group (NHG) [11392]	Object	the NHG believes that the Council should be considering the option of a new settlement, especially in light of the availability of RAF Mildenhall. This option (irrespective of the location) has not been properly considered through this process leading to an artificial restriction of the options to be considered.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
23978 - C J Murfitt Ltd (Mr Colin Murfitt) [12870]	Support	4.19-4.24 - SUPPORT Distribution option 1: Higher growth at Mildenhall and Red Lodge Quarry as with reference to submissions made to the SALP PO concerning land to the south of Mildenhall has capacity for a minimum of 120 additional dwellings.	noted	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
Distribution Option 1: Hig	her growth	a at Mildenhall and Red Lodge and Primary V	illages, and lower growth at Newmarket	
23961 - Mrs W Vale [12861]	Comment	However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allowmall scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required
23953 - Mr & Mrs H Moazzeni [12860]	Comment	However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23947 - Mr & Mrs R Lewis [5666]	Comment	broadly in agreement subject to comments below However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23896 - Mr William Bishop [5524] Comm	Comment	The purpose of this email is to express my great concern about the very low numbers of Homes proposed for Brandon for the next years up to 2031. Which totals 70.	No further evidence has been presented through the 2016 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.	no action required
		These 70 homes have planning permission and are about to be built at Fengate Drove(the other side of the most terrible Railway Crossing in the World. The Site was at one time the Best industrial Site in Brandon.		
		If you check your Census figures you will find the Brandon has always has a continuous increase in Population over the last 15 years and this, of course, does not include the high number of Immigrants living here		
		Brandon has always been number 3 in line for Housing in Forest Heath Now it is bottem of the List. The reason appears to be that The Stone Curlew and other Wild Birds would be affected. To my very good knowledge 99% of the Population of Brandon have NEVER seem these birds. It is also possible to encourage these Birds onto another Site. This also begs the question why has this problem only just appeared ?		
		Of course I agree that the majority of the Sites listed in Brandon are not suitable for Housing (Aircraft Noise Flood Plains) But it would be possible to locate Sites which have been selected by FHDC before to allow so sort of Housing Development in Brandon.		
		Looking at Brandon Compered with other Sites it has much going for it. A direct Railway Link to London/Norwich. A RoadA1065/A11 to East Anglia. It certainly does want considering when it comes to the Future of The Brandon Town and all the Residents.		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24019 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	Allocation of 876 dwellings is not sustainable due to (1) the lack of sustainable transport modes to serve the growth in the village which (2) is incorrectly characterised as a Key Service Centre (see comments on the consultation response on the Sustainability Appraisal (SA) submitted herewith); and (3) lack of suitable housing land supply land that is not adversely affected by military jet overflights.	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.	no action required
		Review of allocation for Lakenheath.		
23901 - Mr William Bishop [5524]	Object	 My concerns are as follows. The 80 units include is incorrect as the Planning Permission for these dwellings was placed years ago, renewed and are now being built. Plus a small number of this 80 are in Norfolk. These 80 should not have been placed in The Local Plan for 2016/2031. The FHDC scale for development in 2006 in The Local Plan was 791 and in 2012 760 for Brandon. Why has it been reduced to a Zero Rate ? If the Stone Curlew and other Birds are the Reason WHERE<where defined="" evidence.<="" is="" li="" the=""> The Population growth in Brandon is good Year 2001. 8256 Year 2014. 9425 an increase of approx. 150 per year so in year 2031 Brandon could have some extra 1650 on the Electrol Role. These statistic do not include a large Migration numbers of Visitors/Employers. The is also a large number of Pupils attending the 3 schools at the moment which total between them approx. 1000 pupils </where>	No further evidence has been presented through the 2016 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.	no action required
24496 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG previously objected to Options 1, 2 and 4 in the August 2015 SIR but supported Option 3 low growth for Newmarket which comprised 300-330 residential units. The latest Option 1 refers to lower growth in Newmarket but involves double the previous low growth number i.e. an additional 680 homes (a medium growth scenario in 2015). The NHG considers this represents significant residential development and that it would have significant detrimental impact on the Horse Racing Industry (HRI). The NHG also object to the latest Distribution Option 2 for the same reason.	comments noted	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24010 - Mr Gerald Ball [5741]	Support	5741 Having read the supporting documents I can agree the increase in house building in Mildenhall and Red Lodge and a decrease in Newmarket. However, pressure due to the Cambridge effect may require reconsideration. There are education issues at Red Lodge regarding sufficient provision of primary school accommodation.	Noted. The County Council is in the process of buying a site for a new primary school in Red Lodge which will have the capacity to meet the demand from the proposed housing.	no action required
24096 - Breckland District Council (Martin Pendlebury) [12898]	Support	Breckland Council also welcomes that both of Forest Heath District Council's housing distribution options now propose a low scale of growth, 2% (70 dwellings) for Brandon.	noted	no action required

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

23962 - Mrs W Vale [12861] C	Comment	However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required
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Distribution Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23948 - Mr & Mrs R Lewis [5666]	Comment	broadly in agreement subject to comments below However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required
23954 - Mr & Mrs H Moazzeni [12860]	Comment	However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required

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

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24497 - Newmarket Horsemen's Group (NHG) [11392]	Object	The SIR states: "the majority of growth in Newmarket would be on the Hatchfield Farm site and the need to ensure an appropriate balance around managing the movements of vehicles and horses within the town, it may be more appropriate for a lower growth in the town." This presupposes the Hatchfield Farm proposals will be allowed; and assumes Option 1 'lower growth' is acceptable without evidence to support it. In transport terms the deficiencies in the evidence base are set out in the representations on the IDP. The NHG consider that Hatchfield Farm is not deliverable without issues relating to the safety of horses being resolved at Rayes Lane. Evidence in this regard was submitted to the Hatchfield Farm Public Inquiry on behalf of the NHG.	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required
24020 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Object	Allocation of 876 dwellings is not sustainable due to (1) the lack of sustainable transport modes to serve the growth in the village which (2) is incorrectly characterised as a Key Service Centre (see comments on the consultation response on the Sustainability Appraisal (SA) submitted herewith); and (3) lack of suitable housing land supply land that is not adversely affected by military jet overflights.	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.	no action required
		Review allocation for Lakenheath.		
24097 - Breckland District Council (Martin Pendlebury) [12898]	Support	Breckland Council also welcomes that both of Forest Heath District Council's housing distribution options now propose a low scale of growth, 2% (70 dwellings) for Brandon.	noted	no action required
4.25-4.29				
24498 - Newmarket Horsemen's Group (NHG) [11392]	Object	The SIR states: "the growth in Newmarket would balance the need to protect the Horse Racing Industry while delivering additional growth, meeting the needs of the whole town". The NHG consider that it is not possible to draw this conclusion without the evidence base in place. In transport terms the deficiencies in the evidence base are set out in the representations on the IDP.	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.	No action required.

Question 2

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
Question 2				
23998 - Meddler Properties Ltd [12884]	Comment	Notwithstanding our comments made in response to Question 1 that a higher overall housing figure for the district should be considered, our preference between the two options put forward for consultation is Option 1 on the grounds that it proposes a higher percentage of housing to be allocated to the Primary Villages. This is considered to provide greater certainty and flexibility in housing delivery than the suggested alternative Option 2 which places a greater reliance on housing provision in the significantly constrained higher order settlements.	noted	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24114 - Moulton Parish Council (Mr Bill Rampling) [12007]	Comment	debate on these documents and proposals for the most appropriate places for housing, employment, retail, community and leisure uses will help the elected councillors make the best decisions for the Forest Heath area. However, Moulton councillors were disappointed to note that none of the Parish Council's earlier comments on the Core Strategy for growth and site allocations had been taken into account in the current stage of the consultation. In particular, the suggested minimal growth for Brandon of just 70 homes, despite significant investment in the town is not sound planning policy. It is also unfortunate that the suggested growth for Newmarket is minimal compared with the other market towns and primary villages, despite being capable of sustaining higher growth than the primary villages. Moulton councillors are concern that their views submitted in the October 2015 do not appear to have been considered when drafting the current preferred	Comments noted. Consultation comments and other evidence based work have all informed an available, realistic and deliverable SIR distribution.	no action required
	options. The Parish Council would like to re-iterate that the most sustainable solution would be to promote the majority of growth in the 3 major towns of Newmarket, Brandon and Mildenhall. In addition, the constraints of poor transport links, only one road, and a lack of employment in Lakenheath should restrict high growth. Also, Red Lodge has no employment, very poor infrastructure as well as the ongoing concerns for the sewerage system and this should demonstrate that further growth is not appropriate until the infrastructure is improved and the existing development is fully sustainable.			

Question 2

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24394 - The Exning Estate [12928]	Comment	Savills on behalf of our client, the Exning Estate, supports 'Distribution Option 1: Higher growth at Mildenhall and Red Lodge and Primary Villages, and lower growth at Newmarket'. It is considered that Distribution Option 1 would help sustain the services of Primary Villages throughout the District and enhance the rural economy. Lower growth at Newmarket is also important to prevent the coalescence of Exning and Newmarket and as identified in paragraph 4.12, the settlement expansion of Newmarket is significantly constrained by the Horse Racing industry and its associated land uses. The NPPF at paragraph 47 requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. The Forest Heath District Council Assessment of a five year supply of housing land report covers the period from 1April 2016 to 31 March 2021 and states that the Council has a 6.9 year supply of housing land including a 5% buffer. It is considered that the dispersed housing delivery across the District outlined in Distribution Option 1 provides the most sustainable approach to maintaining the Councils 5 year housing land supply throughout the plan period.	noted	no action required
24163 - Historic England (Dr Natalie Gates) [12915]	Comment	We do not have preference for either option, as it will depend on the distribution, allocation and masterplanning of housing in terms of any impact on the historic environment. There is no 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	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 in the SALP

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24102 - Newmarket Trainers' Federation (Mr Mark Tompkins) [12333]	Comment	RAF Mildenhall should close by 2022 not long in planning terms and would be the ideal site for future growth and development. It must be the right place to concentrate on. Hatchfield is the wrong place to put mass housing. There are better locations in the district i.e. Mildenhall, Red Lodge.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan	no action required
24079 - Hills Residential Ltd [12651]	Comment	Option 1 should be pursued. In relation to a housing on target of 7,600 (see response to Q1), provision for at least 1,700 homes should be made at Red Lodge.	noted	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24288 - Bennett Homes [6665] Commen	Comment	In the previous round of consultation, which ended in September 2015, Gerald Eve LLP made representations on behalf of Bennett Homes to support the growth laid out in Options 1, 2 and 3 over Option 4. Options 1, 2 and 3 proposed a high level of growth at Lakenheath, in the order of 880 - 975 homes. Option 4 proposed growth in Lakenheath of between 410 and 460 homes. The representation made argued that that these options recognised Lakenheath's capacity to accommodate sustainable growth, however also argued that the town has a capacity for 2,660 new homes.	Noted. The distribution is 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.	no action required
		Both options 1 and 2 propose 800 new homes in Lakenheath. Both options state that "growth at Red Lodge and Lakenheath is the maximum these settlements can deliver in this plan period, taking into account existing environmental and infrastructure constraints".		
		The higher growth level as proposed under the earlier options 1- 3 is welcomed; however, it is considered that the town could support a higher allocation of homes. This is evidenced by the number of allocations considered under the 2016 SHLAA; the "Council's estimated capacity" for Lakenheath is 1492.		
		Further, the SHLAA suggests at paragraph 5.4 that "the council's estimations for number of homes deliverable on sites [within the Site Allocations Document] are at the lower end of the scale, and there may be potential to increase capacities if required". As such the number of homes proposed at Lakenheath could be increased.		
		Unlike some of the smaller order centres, such as the primary villages, Lakenheath has several pre- existing services that make the town a suitable candidate for growth. The draft infrastructure Delivery Plan states that the town has 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 I errands within the town, rather than having to drive out of the town.		
		Paragraph 4.6 of the 'Core Strategy Policy CS7		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action	
		overall housing provision and distribution preferred options' document states that "there is support for distributing growth in accordance with the settlement hierarchy in CS1, with the focus on market towns, key service centres and finally, primary villages". Increasing the allocation at Lakenheath would continue to support this aim.			
		Allocating further housing at Lakenheath, a second order settlement, would be consistent with CS7 and consistent with the outcome of the SHLAA. The additional homes allocated for Lakenheath could reduce the required homes in 'primary villages' and ensure that CS1 is met. Therefore, it is considered that Lakenheath could accommodate higher levels of growth than the 800 recommended within the Single Issue Review .			
		Gerald Eve LLP have also made representations on the draft Site Allocations Local Plan (SALP). n that representation we suggest that the additional housing could be provided on site L28. This site was identified within the 2016 SHLAA as deliverable and therefore should be included within the SALP. Lakenheath is capable of accepting a higher level of growth than the 800 proposed under options 1 and 2			

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23942 - Mr B Keane and Mrs L Planas [12852]	Comment	Broadly in agreement subject to comments on attached sheet	Comments noted - specific site allocations are dealt I with within the SALP and not the SIR which addresses the broad locations for growth.	No action required.
		This representation is being made on behalf of Mr B Keane and Ms L Planas in respect of adjacent sites being put forward jointly as a potential residential allocation.		
		These sites are on the southern side of Worlington Road on the western edge of Mildenhall and comprise Grove Farm and Rose Forge.		
		This representation should be read in conjunction with/cross-referred to similar representations on the same basis being made to the Site Allocations Local Plan.		
		The Respondents are broadly in agreement with the overall housing provision in terms of need and numbers as dealt with in Question 1 and with either of the Distribution Options 1 or 2 dealt with in Question 2.		
		However, they believe that the site the subject of these representations is more appropriate as an allocation to meet housing needs than a number of formal allocations in Mildenhall and particularly those being pursued under references MI(a) and M2(b).		
		In summary, MI(a) involves the substantial loss of agricultural land. There is no clearly defined urban edge.		
		The distance to and from facilities, principally within Mildenhall Town Centre are at some distance (further than the site the subject of these representations).		
		The numbers of dwellings to be brought forward and timescales are uncertain and all subject to the development of a Masterplan.		
		This site, even if pursued, will not therefore deliver dwellings for some considerable time.		
		With regards site M2(b), the delivery of this site is uncertain as it requires other development to take place and as such there are no dwelling numbers		

Question 2

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action	
		available as to what can be provided and no realistic timescales for the site being brought forward. As with site MI(a), this site will not deliver dwellings for some considerable time even if realised.			
		The site the subject of these representations is immediately adjacent to the urban edge of Mildenhall, is largely brown field/developed land, has the benefit of existing access arrangements, is flat and level and importantly is immediately available for residential development.			
		There are no known constraints to the immediate development of this site.			
		A location plan is attached showing the joint sites to be taken forward together (which is substantially reduced from the two sites when put forward in the earlier consultation exercise and assessed under references M/41 and M/42).			
24189 - Animal Health Trust [4678]	Comment	AHT supports Distribution Option 1.	comments noted	no action required	

Question 2

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24006 - Necton Management Ltd Commer [12888]	Comment	Necton Management supports Option 1 as this provides a good distribution of growth across the top tier of the settlement hierarchy as well as ensuing a good distribution of growth across the larger villages including Lakenheath. However, it is noted that largest allocation for additional provision is allocated to land to the west of Mildenhall where the Council is continuing to works with stakeholders to determine the infrastructure required to support this growth. This approach may be flawed.	noted	no action required
		The fact that Mildenhall may require significant infrastructure improvements is not a constraint on development over the plan period if it is planned for in a strategic way. Infrastructure delivery will not constrain absolute numbers and rates of delivery to meet the FOAN it also needs to be determined that the annual build rate that is required to meet need can be achieved especially in the early years of the plan. Our concern is that infrastructure implications are so significant that there is a real risk that the onset of development will be delayed resulting in a shortfall in early years of the plan.		
		The Council should therefore consider allocating additional sites in other locations such as Lakenheath to deliver in excess of the final housing requirement to provide a buffer for lack of implementation in the early stages of the plan, 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.		

Representations Natur	e Summary of Main Issue/Change to Plan	Council's Assessment	Action
24226 - Mr Richard Ward [12917] Comme	nt Out of the two options I would lean towards option 1 purely because this is the lower option for Newmarket, but RAF Mildenhall has not be accounted for within the options given therefore the facts presented along with other detail is neither up to date or correct	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24123 - Newmarket Town Council (Mr John Morrey) [12910]	Comment	NEITHER but out of the two options put forward by FHDC Option 1 is preferable. However both options exclude the impact of the closure of RAF Mildenhall and include housing figures for Hatchfield Farm. Newmarket Town Council objected to the planning application for 400 homes at Hatchfield Farm and until a decision has been made by the Secretary of State, it should be excluded from any housing figures. Most importantly , it is noted the AECOM transport report dated 10 May 2016 appears to rely on evidence collated in 2009 and does not reflect current traffic conditions. The original objection to Hatchfield Farm by Newmarket Town Council included numerous reasons for objecting, including, inter alia, that the existing highway infrastructure cannot accommodate any large scale development in the town. Newmarket is home to amongst other businesses, an internationally renowned industry which makes such a significant employment and financ ial contribution to the district/region/national economy. The Deloitte Report as commissioned by FHDC on the Local, National and International impact of Horse Racing in Newmarket dated September 2015 highlighted traffic as an issue for the industry and recommended that a Highways Study is commissioned to identify the nature of the highway conflicts. However this recommendation does not appear to have been implemented. The Deloitte Report also confirms that Newmarket is a national heritage sporting asset, "used as an unique selling point of British Racing to international investors", and should be protected and treated accordingly. and states "increased traffic levels have been consistently highlighted as a major threat to the continued health of the Horse Racing Industry in Newmarket". It is imperative therefore that the traffic study should be undertaken prior to the allocation of any development.	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required
24473 - Talavera Estates Ltd [12704]	Comment	We do not prefer either of the two housing distribution options because they do not give enough weight to local adopted planning policy (Policy CS1) or 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.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24136 - John Gosden Racing LLP (Mr John Gosden) [12700]	Comment	NEITHER but out of the two options put forward by FHDC Option 1 is preferable. However both options exclude the impact of the closure of RAF Mildenhall and include housing figures for Hatchfield Farm, which has yet to be decided. The planning application for 400 homes at Hatchfield Farm has been called in by the Secretary of State and it should be excluded from any housing figures until a decision is known. The original objection to Hatchfield Farm by many people in Newmarket and included numerous reasons for objecting, including that the existing highway infrastructure cannot accommodate any large scale development in the town. Most importantly, it is noted the AECOM transport report dated 10 May 2016 appears to rely on evidence collated in 2009 and does not reflect current traffic conditions. I, as a horse racing trainer, am part of an internationally renowned industry in Newmarket which makes a significant employment and financial contribution to the district/region and national economy. The Deloitte Report as commissioned by FHDC on the Local, National and International impact of Horse Racing in Newmarket dated September 2015 highlighted traffic as an issue for the industry and recommended that a Highways Study is commissioned to identify the nature of the highway conflicts. As yet nothing has been done to put commission this Study. The Deloitte Report also confirms that Newmarket is a national heritage sporting asset, "used as a unique selling point of British Racing to international investors", and should be protected and treated accordingly. It also states "increased traffic levels have been consistently highlighted as a major threat to the continued health of the Horse Racing Industry in Newmarket". It is obvious that the traffic study should be undertaken prior to the allocation of any development.	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24354 - Persimmon Homes Ltd (Ms Laura Townes) [12549]	Comment	Support is given for Option 1 which identifies additional growth at the Primary Villages. Some additional development should be considered for Exning given that it is one of the least environmentally constrained settlements in the District. The Infrastructure Delivery Plan shows that there is a good network of existing infrastructure with capacity or the ability for improvement with developer contributions and is sustainability located and connected to Newmarket. The Site Allocations identifies Site E1(b) for allocation of 140 dwellings which is supported. However, given the relative lack of constraints at Exning, it is proposed that the capacity of Site E1(b) is not unnecessarily constrained as it can be demonstrated the site can successfully accommodate some additional dwellings (see Site Allocations representation).	noted	no action required
24108 - BBA Shipping and Transport Ltd (Mr Kevin Needham) [12680]	Comment	Given two choices the lower one is preferable but given the reasons above and the enquiry on Hatchfield a total rethink would be more appropriate.	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24301 - Herringswell Parish Council (Mrs Su Field) [5165]	Comment	Sequential development, development located in and around the market towns, is supported through national planning policy and by Herringswell Parish Council. It is a core principle feature of sustainable development given the range of existing services and facilities to be found in the market towns. 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 is supported by Herringswell Parish Council. We do not believe that the two options have reflected our previous comments to this consultation and those of many of the other rural parishes. We note that both options fall far short of locating the highest proportion of new development to the three market towns. Option 1 only seeks to deliver a total of 38% of ALL new growth to the market towns and option 2, only 41%. This does not demonstrate sequential development. The adoption of either of these two options promotes more growth to Red Lodge than ANY one of the market towns. We do not support either option and request that an alternative option is sought which actually does reflect sequential development for the district. An option which ensures the 3 market towns absorb the majority of growth within the district. An option which prevents the continued over expansion of our rural villages. An option which protects the countryside from urbanization. There is an undersupply of jobs, services, infrastructure, health care, educational provision, shops etc. etc in Red Lodge. Development in this location does not support a sequential approach to development and is unsustainable. Housing development needs to be closely aligned with employment opportunities. Both these options, if adopted are reliant on land been released at Red Lodge which is currently designated for employment use. We have consistently raised our concerns with the Council about the sewerage network which is unable to function adequately in order to serve the number of	The SHMA update 2016 has indicated there is a need to provide a lower provision of 6800 dwellings.	no action required

Question 2

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
		houses currently on the system. Growth at Red Lodge will only exacerbate the situation for those villages using the network. We request that the embargo to prevent development at Red Lodge is reinstated until Anglian Water can demonstrate to residents that the system is functioning adequately. For these reasons above and our many previous objections made throughout the consultation stages, we do not consider either options are deliverable.		
23960 - Mrs W Vale [12861]	Comment	However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which all small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23991 - East Cambridgeshire District Council (Mr Richard Kay) [12883]	Comment	Question 2 Response: Whilst ECDC notes the two fairly similar options set out (including the 'preferred option'), it makes no specific recommendation as to which to choose, due to the clear complex issues (and constraints) that need to be considered by your council in order to reach a decision. That said, both options appear, in principle, reasonable, and therefore ECDC does not object, in principle, to either. Whichever distribution option is taken forward, perhaps the primary consideration and concern for ECDC would be in the form of any increase in cross- border traffic, especially any increase in traffic along inappropriate 'rat-runs', such as Mildenhall - Fordham - A142 (with traffic avoiding using the A11/A14, in this instance). Whilst preventing such 'rat- runs' is clearly very difficult, the detailed location of, and access to, development sites can make such rat- runs a less attractive option.	Comments noted. We will continue to work with East Cambridgeshire District 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.	No action required.
24022 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	For the district option 2 makes sense as there is a huge need for affordable homes in all areas. For Lakenheath cannot accept either distribution option until mitigation in place to cover highways constraints, employment, Education and Health facilities. Lakenheath is not against additional sustainable growth we have supported growth in past document/consultation. However, since the original LDP was drawn up in 2006 and the consultation in 2010 LPC were ignorant of some very important facts which have impacted severally on our view as to how much growth the Village can now take and sustain.	noted	no action required

Question 2

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23950 - Mr & Mrs R Lewis [5666]	Comment	broadly in agreement subject to comments below However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required
23976 - Mr Stephen Griffiths [12866]	Comment	My client supports a minor dispersal policy that allows some limited growth in serviced villages so that homes continue to be available for local people.	noted	no action required
24176 - Ms Sara Beckett [6689]	Comment	If I had to choose or agree with the 2 options provide it would be for the lower figure for Newmarket therefore option 1, but in my view the data supplied does not account for the availability of RAF Mildenhall which it should . Hatchfield Farm has yet to be decided and the impact of any further allocations and distribution of those figures has not been taken into account .Infra structure has not been addressed, the transport report is out of date and these are failures which need to be rectified before further decisions are made.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan. Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this plan.	no action required

Question 2

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23952 - Mr & Mrs H Moazzeni [12860]	Comment	However, they object insofar as they believe strongly that small-scale allocations and/or alterations to settlement boundaries in lower order villages, i.e. secondary villages, ought to be made to enable limited/controlled residential development to take place in these villages in order to keep these settlements vibrant throughout the plan period to 2031. The Respondents fully accept that strategic allocations of land for residential development have to be made in accordance with an agreed hierarchy of settlements but not to the detriment of a continued viability of lower order settlements. Some form of recognition/allowance must be made either in text form or amendments to Frameworks to facilitate smaller-scale, controlled residential development in smaller settlements.	Noted. There are policies in the 2015 joint DM document which allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements without the need for a formal site allocation.	no action required
24153 - Gladman (Mr Russell Spencer) [6673]	Comment	Gladman have no comment on which of the two options should be preferred. This decision should be based on the findings of the evidence base and should not be a politically driven spatial strategy to put a disproportionate amount of housing in areas where people don't want to (and will not) live. If the spatial distribution does not reflect need/demand as shown by the evidence base, then housing will not be delivered and the Plan will not be implemented. Gladman would suggest a hybrid approach should be taken, with more sustainable settlements taking a greater proportion of growth than less sustainable locations. In allocating sites, the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products.	noted	no action required

Question 2

Representations Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24431 - R J Upton 1987 Comment Settlement Trust [12681]	The Landowner supports Distribution Option 1. We note that the Sustainability Appraisal's assessment of the two options emerging from the four canvassed at the previous consultation stage shows that neither has a decisive advantage over the other. In many important respects - housing, education, health and historic environment - they are ranked equal. There is a "potential to differentiate" on the basis of five other topics including biodiversity. Although a Sustainability Assessment is a requirement, we have doubts about the outcomes being used uncritically to make choices. An element of planning judgment is required; the Council's reasoning appears to be sound. Furthermore, if as we have argued in respect of Question 1 total housing provision is increased to the extent that we advocate, this has implications also for distribution. We recommend the distribution of any increase on a basis commensurate with the proposed distribution at all named settlements except Newmarket, and particularly at Red Lodge where unconstrained land has been identified.	noted	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
23974 - Mr Stephen Griffiths [12866]	Comment	There are distributions offered and we support the principle of some diversity of development.	noted	no action required
		PARTICULAR COMMENTS RELATING TO THIS SCHEME		
		Site history		
		In 2010, a planning application was submitted to the LPA with the full support of Moulton Parish Council. This proposed 9 dwellings, broadly as shown in the plan attached. Since then, a replacement dwelling has been built at the southern extremity of the site, so the proposal would be for a further 8 dwellings on this site, built at low density.		
		Affordable housing		
		Under the ruling established recently in the High Court, affordable housing would not be required on this site as the proposal is for fewer than 10 dwellings.		
		Localism		
		With the concept of localism at the forefront of local planning, it seems extraordinary that when development of this site is supported by the Parish Council, it cannot be approved by the LPA. The alternative, of course, is for Moulton to set up a Community Development Trust and proceed independently of the planning system. We request that the Local Plan should include a short policy reading: 'Organic Expansion of Villages: small scale growth appropriate to the scale of existing secondary villages will be supported where impact on landscape and Conservation Areas and other issues are not compromised.'		
23888 - West Suffolk Councils WSC Housing Development and Partnership) [12654]	Comment	We consider that given the level of demand and need for both market and affordable housing in Newmarket, the target figure for Newmarket in Option 1 does not adequately meet this need. We suggest a reapportionment of new dwellings between the various towns and villages so as to increase the number assigned to Newmarket to be nearer to, or meet, the figure assigned to Newmarket in Option 2.	The housing technical report set 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 within the technical paper.	no action required

Representations Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24299 - Jaynic Properties Ltd Comment [12521]	Jaynic Properties Ltd generally supports Distribution Option 1 as the preferred option. Red Lodge is able to provide for higher residential growth along with Mildenhall and Primary Villages. They are able to take further growth compared to Newmarket. However, as shown within our Five Year Housing Supply Analysis (attached as Appendix 4), there is considerable doubt in respect of the deliverability of a number of draft allocations within Newmarket and Lakenheath, which may require additional sites to be found within the District. For the reasons given within Section 2 of these representations, Red Lodge is capable of accommodating additional dwellings, and we would argue that Land West of Newmarket Road, Red Lodge (EM1(c)) should be allocated for residential development, which would help to address a potential shortfall in the Council's housing supply. It would also prevent the protection of the site for restricted employment uses that, due to specific site constraints, are not deliverable.	noted	no action required

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24356 - Merlion Capital [12926]	Object	Put simply, we do not support Options 1 or 2. This is on the basis that we consider that they each have the same shortcoming, that being that in both cases the total additional provision only equates to 4,600 dwellings which when added to existing commitments and completions (2011-2015) only equates to an overall total housing provision of 6,808 dwellings, a mere 8 dwellings in excess of the minimum OAN figure which should be achieved by the plan.	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.	no action required
		Paragraph 4.2 of the SIR document even sets out that "the Council must put in place a distribution strategy that is deliverable". It is clear however that despite all the best intentions to draft a plan which is deliverable, there are a wide number of issues within the development industry outside of a Council's control which can impact on deliverability. These can relate to the decision by a developer not to build out a scheme in the timings which may have previously been suggested or the lengths of time taken for parties to sign S106 agreements. Whatever the issue, such matters can have strong ramifications in terms of maintaining housing supply consistently throughout the plan and in turn in relation to consistently demonstrating a five year housing land supply. Clearly, by only allocating sites enough sites to meet the OAN, the Council places themselves at greater risk of planning by appeal. Put bluntly, the numbers involved means that there is only one site which could not deliver (site BR1d for 5 dwellings), without resulting in the plan failing to meet the minimum target set by the OAN.		
		We therefore strongly object to both options 1 and 2 in terms of the principle on which they are both established, that being to only just meet the OAN. We do not consider that this strategy provides sufficient flexibility for the non-delivery or delays in the delivery of any of its allocations. For an Inspector to be satisfied that the plan can deliver its OAN, we consider that additional sites should be included as clear the current over-provision of 0.1% is insufficient. We believe that as a minimum a buffer of 5% (equivalent to 340 dwellings) should be included, but that 10% may be the more appropriate option (equivalent to 680 dwellings). A sensible approach		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action	
		would be to distribute the additional figures to the most sustainable locations within the District. 1.9 We also note the Council's intentions to commence an immediate review of the Local Plan should a firm position be reached regarding the availability of RAF Mildenhall. With it considered likely that a review of the Local Plan would be necessary on the basis that such information is not likely to come about until sometime after the adoption of the SALP, the Council will also need to provide sufficient flexibility in order to detangle itself from the current allocations, if the desire to review the plan to include RAF Mildenhall relates to a preference in the redevelopment of that site over any others currently proposed for allocation. Specifically, if for example, the redevelopment of RAF Mildenhall could be a preferred approach to development at M1a for example for 1,250 dwellings or indeed any other large site or combination of sites which do not currently have planning permission, it is clear that a masterplan for RAF Mildenhall and the review process will take some time to implement. 1.10 Our client's land at Station Road which would be suitable for delivering circa 110 dwellings, could assist in terms of both ensuring that the plan is robust by providing sufficient flexibility to respond to market conditions and also in providing scope at Mildenhall to deliver sustainable development in the short term, whilst giving the Council sufficient time in terms of maintaining housing land supply to carry out a future review of the plan if required at a relevant time in order to incorporate RAF Mildenhall into a revised			
		Paragraph 47 of the NPPF sets out that in order to boost significantly the supply of housing, local planning authorities should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market areas". Without any flexibility within the SALP, we do not consider that sufficient weight is being attached to the importance the Government places on ensuring that the OAN is met in full. Having reviewed the SA which accompanies the SIR, we note that 'reasonable alternatives' of allocating			

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action	
		sites in order to secure an uplift on the OAN was not			
		considered for any reason other than for the purpose			
		of securing a higher level of affordable housing.			
		We disagree that this was the only 'reasonable			
		alternative'. The NPPG (Reference ID: 11-019-			
		20140306) sets out that "sustainability appraisal needs to compare all reasonable alternatives			
		including the preferred approach and assess these			
		against the baseline environmental, economic and			
		social characteristics of the area and the likely			
		situation if the Local Plan were not to be adopted." It			
		goes onto state that "Reasonable alternatives are the			
		different realistic options considered by the plan-			
		maker in developing the policies in its plan. They			
		must be sufficiently distinct to highlight the different			
		sustainability implications of each so that meaningful comparisons can be made. The alternatives must be			
		realistic and deliverable."			
		Whilst an alternative to deliver more housing was			
		considered, it is clear that the assessment was			
		focussed solely on the purpose of securing higher			
		levels of housing in order to increase the levels of			
		affordable housing. The SA assessment of the			
		alternative clearly resulted in Option 2 being			
		preferable in terms of housing objectives, as			
		affordable housing needs would be met to a greater			
		extent and could also lead to additional opportunities in terms of community and economic objectives. The			
		overall effect that this approach would have on the			
		overall deliverability of the OAN was not however			
		considered as the premise of the alternative was			
		focussed solely on affordable housing delivery.			
		The conclusions of the SA's assessment of a higher			
		growth strategy are not supported by our client.			
		Clearly, the SA indicated that the option would be			
		preferable in respect of many of the issues and the			
		Council's conclusion that "it is not possible to conclude that a higher growth strategy would perform			
		significantly better in terms of any objective" is not			
		considered to be sufficiently robust so as to determine			
		that the strategy is not the most sustainable and that			
		the proposed plan is therefore deviating from a better			
		strategy.			
		Reliance on the Council's potential environmental			
		issues relating to its internationally important wildlife			
		sites ultimately appears to be the reason to discount			

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action	
		the alternative of delivering a higher growth strategy.			
		However, yet again there is no real evidence put			
		forward in this respect with the commentary merely			
		stating that "a higher growth strategy would make it			
		more of a challenge to ensure that impacts to the			
		internationally important wildlife sites are avoided". Of			
		course, this substantially depends upon the locations			
		of additional sites being selected for allocation, which			
		is recognised in the latter half of the relevant sentence			
		in the commentary. A further reasonable alternative			
		following the outcome of the two growth strategies			
		selected, would have been to then test the omission sites in terms of their potential impact on the			
		international sites and allow those which do not result			
		in an impact to be allocated in order to increase the			
		overall sustainability of the plan. Given the findings of			
		the SA, it is not clear to the reader why the chosen			
		strategy to only provide sufficient housing to precisely			
		meet the OAN was selected and the alternative to			
		deliver a 10% uplift was rejected. Even within			
		paragraphs 3.4-3.6 of the SIR when the issue is			
		explained again, the reason for rejecting the			
		alternative is not clear.			
		In respect of the above, our client's land interests at			
		Station Road, Mildenhall are not constrained by the			
		international designations. As such, the site could			
		deliver housing above that currently identified by the			
		draft SALP and SIR, securing additional affordable			
		housing and other benefits, whilst not resulting in			
		likely significant adverse environmental effects nor			
		would it be affected by noise. Indeed, for reasons set			
		out in our response to the SALP below, the site would			
		actually have positive effects in terms of noise.			

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24310 - Tattersalls Ltd (Mr John Morrey) [5726]	Object	Tattersalls objects to both options as they exclude the impact of the closure of RAF Mildenhall and include housing figures for Hatchfield Farm. As part of the Newmarket Horseman's Group, Tattersalls has been clear in its opinion that the development of Hatchfield Farm will have an adverse impact on the horse racing industry.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
			2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	
24160 - Jockey Club Estates Ltd [12903]	Object	JCE objects to both options as both options identify substantial growth in Newmarket and both options rely on the redevelopment of Hatchfield Farm for either 400 or 800 homes. JCE has been clear in its opinion on the redevelopment of this site for housing and considers that it will have an adverse impact on the horse-racing industry - a recognised constraint to development (see 4.12 of this consultation draft).	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required
		Delete Hatchfield Farm allocation from the plan.		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24307 - Elveden Farms Ltd [12921]	Object	We do not support either of the housing distribution options. The selected option should have sufficient flexibility to accommodate other potential growth options.	noted	no action required
		These could include amendments to the boundaries of secondary villages, to facilitate development that would underpin the provision of new infrastructure and community facilities that would enhance the sustainability of these settlements, where there is the environmental capacity to accommodate such growth.		
		We do not support either of the housing distribution options. The selected option should have sufficient flexibility to accommodate other potential growth options.		
		These could include amendments to the boundaries of secondary villages, to facilitate development that would underpin the provision of new infrastructure and community facilities that would enhance the sustainability of these settlements, where there is the environmental capacity to accommodate such growth.		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24334 - Mrs Rachel Hood [12509]	Object	Neither, but out of the two options put forward by FHDC Option 1 is preferable. However both options exclude the impact of the closure of RAF Mildenhall and include housing figures for Hatchfield Farm, which has yet to be decided.	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required
		The planning application for 400 homes at Hatchfield Farm has been called in by the Secretary of State and it should be excluded from any housing figures until a decision is known. The original objection to Hatchfield Farm by many people in Newmarket and included numerous reasons for objecting, including that the existing highway infrastructure cannot accommodate any large scale development in the town. Most importantly, it is noted that the AECOM transport report dated 10 May 2016 appears to rely on evidence collated in 2009 and does not reflect current traffic conditions. I, as an owner and breeder of racehorses and former president of the Racehorse Owners Association am very involved in the internationally renowned industry in Newmarket which makes a significant employment and financial contribution to the district/region and national economy. The Deloitte Report was commissioned by FHDC on the Local, National and International impact of Horse Racing in Newmarket dated September 2015 and highlighted traffic as an issue for the industry and recommended that the highways study is commissioned to identify the nature of the highway conflicts. As yet nothing has been done to put commission this study.		
		The Deloitte Report also confirms that Newmarket is a national heritage sporting asset, "used as a unique selling point of British Racing to international investors", and should be protected and treated accordingly. It also states "increased traffic levels have been consistently highlighted as a major threat to the continued health of the Horse Racing Industry in Newmarket". It is obvious that the traffic study should be undertaken prior to the allocation of any development.		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24500 - Newmarket Horsemen's Group (NHG) [11392]	Object	The NHG objects to both options as both options identify substantial growth in Newmarket and both options rely on the redevelopment of Hatchfield Farm for either 400 or 8000 homes. The NHG has been clear in its opinion on the redevelopment of this site for housing and considers that it will have an adverse impact on the horse racing industry - a recognised constraint to development. Neither of the options 1 and 2 has an evidence base in transport terms to support it. as stated in the representations in 2015 and the NHG considers 300- 330 homes can be delivered assuming the associated traffic movements and interaction with horse movements can be satisfactorily addressed.	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required
24321 - Save Historic Newmarket Ltd (Ms Sara Beckett) [11232]	Object	Neither option has been correctly assessed due to factors including: Hatchfield Farm decision not known, RAF Mildenhall, aecom data not in date, recognition that Newmarket is unique and the effect traffic has on the town and its USP.	It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan.	no action required
			Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
24445 - Crest Nicholson (Eastern) [11393]	Support	Crest Nicholson supports Distribution Option 1.	noted	no action required
		if as we have argued in respect of Question 1 total housing provision is increased to the extent that we advocate, this has implications also for distribution. We recommend the distribution of any increase on a basis commensurate with the proposed distribution at all named settlements except Newmarket.		
		We recommend the distribution of any increase on a basis commensurate with the proposed distribution at all named settlements except Newmarket.		
24391 - Mrs Anita de Lotbiniere [6677]	Support	Point 2 I strongly support the proposed distribution particularly for Brandon for the reasons stated.	noted	no action required
24343 - Environment Agency (Elizabeth Mugova) [12393]	Support	Single Issue Review Policy CS7 Overall Housing Provision and Distribution We are supportive of either option.	noted	no action required
23980 - C J Murfitt Ltd (Mr Colin Murfitt) [12870]	Support	Option 2 for the reasons specified	noted	no action required
24078 - Lord Derby [5831]	Support	Option 1 is supported. This directs 968 dwellings of the overall housing provision to Newmarket. Lord Derby can confirm the statement at paragraph 4.12 of the SIR that land for 400 homes at Hatchfield Farm is available and deliverable. As such, it would be a sound and sustainable development allocation in the largest town in Forest Heath.	Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.	no action required