

Proposed Submission Single Issue Review of Core Strategy Policy CS7

Public Participation Report

1. Background to the single issue review process

1. Background to the single issue review process

| Representations | Nature | Summary of Main Issue/Change to Plan | Council's Assessment | Action |
|--|--------|--|---|---------------------|
| 1. Background to the single issue review process | | | | |
| <i>1. Background to the single issue review process</i> | | | | |
| 24803 - Lakenheath Parish Council (Ms C Shimmon) [12422] | Object | <p>Notification received in December of the consultation to commence 10th January. Lakenheath were provided with a drop in event to elaborate on the contents of the consultation, leaflet attached stating representations could be made in writing or email. Insufficient time given to advertise the event.</p> <p>The Parish arranged their own event 7th February to better inform the Village of the proposals. This was well attended. The overwhelming response was astonishment as to the extent of the proposals. Representations have been submitted but not all accepted by the LPA as they are not on prescribed forms. These forms are ridiculously complex.</p> <p><i>User friendly forms with no representations returned. All representations should be accepted and noted.</i></p> | <p>All parishes/town councils were notified of the consultation start date and the council-run and advertised events. While we invite parishes to undertake additional advertising of the event where possible, this is not a requirement.</p> <p>Notes were provided alongside the forms to assist with completion. While people were encouraged to use the forms, responses were still accepted in other formats.</p> | No action required. |
| 24670 - Lakenheath Parish Council (Ms C Shimmon) [12422] | Object | <p>The amount of growth does not follow a plan led sequential approach to development. It is therefore unsound, undeliverable and unsustainable.</p> <p><i>A plan led sequential approach in line with the NPPF starting with the market towns.</i></p> | <p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement. The council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.</p> | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|---|---|---------------------|
| 24863 - Newmarket Horsemen's Group (NHG) [11392] | Object | <p>1.7</p> <p>The NHG has consistently raised concerns about the adequacy of the Habitats Regulation Assessment. These concerns have not been addressed by the responses given. In light of these concerns, the NHG considers that this part of the Local Plan fails the test of soundness. It is not considered to be justified by the evidence available and the inadequacies of the HRA make it inconsistent with national policy. It also calls into question the extent to which the document is legally compliant.</p> <p><i>The issues identified in the representations to the HRA need to be appropriately addressed to allow for the statement made in paragraph 1.7 to be retained.</i></p> | <p>LUC (the council's HRA consultants) has liaised with Natural England throughout the HRA process to agree the methodology and emerging findings. As the appropriate nature conservation body to be consulted on assessments of plans and projects under the Habitats Regulations, Natural England has confirmed (letter to FHDC dated 13 March 2017, ref. 205675) that it 'agrees with the approach taken and conclusions drawn within this HRA'. The HRA has therefore been undertaken in accordance with the requirements of the Habitats Regulations</p> | No action required. |
| 24861 - Newmarket Horsemen's Group (NHG) [11392] | Object | <p>1.6 - The NHG has consistently raised concerns about the adequacy of the Sustainability Appraisal. These concerns have not been addressed by the responses given. In light of these concerns, the NHG considers that this part of the Local Plan fails the test of soundness. It is not considered to be justified by the evidence available and the inadequacies of the SA make it inconsistent with national policy. It also calls into question the extent to which the document is legally compliant.</p> <p><i>The issues identified in the representations to the Sustainability Appraisal need to be appropriately addressed to allow for the statement made in paragraph 1.6 to be retained.</i></p> | <p>The SA has been undertaken in accordance with the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004. SA-related documentation has been published at relevant points in the plan-making process to help inform stakeholder consultation.</p> | No action required. |

3. Background to assessing the distribution of housing

3. Background to assessing the distribution of housing

Representations

Nature Summary of Main Issue/Change to Plan

Council's Assessment

Action

3. Background to assessing the distribution of housing

3. Background to assessing the distribution of housing

24807 - Newmarket Town Council (Mr John Morrey) [12910]

Object

3.8 - Newmarket Town Council is concerned in regard to the Council's approach to RAF Mildenhall in the preparation of this document.

The document acknowledges that the site will come available by 2023 and hence within the plan period but otherwise the development potential of RAF Mildenhall is ignored in this document.

The document states a commitment to a Local Plan Review in 2018 but reasonable development alternatives should be considered now and a commitment to review the Local Plan in 2018 should be policy as opposed to a commitment.

In order to understand why the site is not included and report to Newmarket Town Council accordingly

Until there is certainty from the MoD over the future uses at RAF Mildenhall and their deliverability and timescales for bringing the site forward, it is not possible to include the site in the Site Allocations Local Plan or consider it as a reasonable alternative.

No action required.

24865 - Newmarket Horsemen's Group (NHG) [11392]

Object

3.18

The Plan unreasonably ignores the development potential of RAF Mildenhall and provides no firm commitment to the early review planning in early 2018 that is intended to address this issue.

The Plan should allow for the development potential of this site to be incorporated into the plan.

Until there is certainty from the MoD over the future uses at RAF Mildenhall and their deliverability and timescales for bringing the site forward, it is not possible to include the site in the Site Allocations Local Plan or consider it as a reasonable alternative.

No action required.

3. Background to assessing the distribution of housing

3. Background to assessing the distribution of housing

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--------------------------------|----------------------|---|--|----------------------------|
| 24725 - Mrs Sue Malina [13074] | Object | <p>I do not believe that the Key Service Centre designation for Lakenheath is justified. It is an isolated rural village with poor transport links in terms of roads and public transport. Services in the village are limited and there is no evidence that increased housing will do anything to help these services grow. The last ten years has seen substantial housing growth but a corresponding decrease in retail provision, bus services, social activities etc. With no additional employment, it will become even more a dormitory town with congested roads as people are forced to commute to work. This is unsustainable.</p> <p><i>Review Key Service Centre designation and consequent emphasis on housing growth in Lakenheath.</i></p> | <p>Noted. The Council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions and settlement hierarchy.</p> | <p>No action required.</p> |

3. Background to assessing the distribution of housing

3. Background to assessing the distribution of housing

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|---|--|---------------------|
| 24636 - Herringswell Parish Council (Mrs Liz Marchington) [5853] | Object | <p>3.19 -</p> <ul style="list-style-type: none"> * This does not follow a sequential approach to development by placing too much emphasis for development in Red Lodge which is void of services and an unsustainable option * The allocation of a further 5ha of new employment land has been overlooked in the document for Newmarket. * The ability for the plan to deliver the planned affordable housing numbers is questionable because most the growth is promoted in Red Lodge. * Placing large numbers of housing for the district in the rural villages, will lead to a high demand on services from Newmarket which cannot be mitigated against and will lead to a situation which ultimately causes harm to the racing community. * Planned growth on the outskirts of Newmarket with associated employment facilities and appropriate mitigation measures is a much better controlled option. * Red Lodge has become the alternative location to dump unwanted development from Newmarket, but policy restricts development at Red Lodge on greenfield sites until after 2021. 88% of development at Red lodge is proposed on greenfield sites which is too much and does not support sufficient phasing for so much development in one location. * <i>A sequential approach to development across the district should be adopted with the most development occurring in the 3 market towns, followed by the key services centres as per national and local planning policy.</i> * <i>The Hatchfield Farm decision is subject of a High Court challenge and FHDC still support the development of the site, and therefore the allocation at the Hatchfield Farm site should be retained.</i> | <p>Noted. The council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.</p> <p>In light of guidance in paragraph 47 of the NPPF (and its footnotes) there is no 'reasonable prospect' at present that the Hatchfield site will be available for development and can be delivered/developed within the Plan period. There are sufficient alternative available, suitable and deliverable sites to meet the district's housing needs to 2031.</p> | No action required. |

3. Background to assessing the distribution of housing

3. Background to assessing the distribution of housing

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|----------------------|--|--|----------------------|
| 24671 - Lakenheath Parish Council (Ms C Shimmon) [12422] | Object | <p>It has failed to adopt a realistic alternative option for the rural less sustainable villages than the high growth option placed up on them.</p> <p>It has disregarded the sequential approach to development as promoted through national planning policy and the councils' own development policies</p> <p>The villages promoted for development are suffering from an infrastructure deficit.</p> <p>Lakenheath has no new employment, full time banking facility or transport links.</p> <p>No garage, few shops and insufficient health care facility</p> <p>The vacation of RAF Mildenhall should be considered.</p> <p><i>Greater levels of growth need to be allocated to the three market towns.</i></p> | <p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p> <p>The council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.</p> | No action required. |
| 24745 - Defence Infrastructure Organisation (Mr Mark Limbrick) [13094] 24746 - Defence Infrastructure Organisation (Mr Mark Limbrick) [13094] | Object | | <p>Noted. Paragraph 3.6 is proposed for deletion by the council. See Statement of Common Ground between the DIO and FHDC dated 18.8.17.</p> | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|---|---|---------------------|
| 24637 - Herringswell Parish Council (Mrs Liz Marchington) [5853] | Object | <p>3.23</p> <ul style="list-style-type: none"> * Red Lodge is not a sustainable location for such large housing numbers (26.5% of the districts housing number) * The amount of development at Red Lodge does not follow the sequential approach to development * The lack of planned housing development at Newmarket is too little leading to an unsustainable approach. * The 3 market towns, especially Newmarket should be allocated the most amount of growth for the district as they are serviced by a sustainable network of infrastructure facilities * The ability of the plan to deliver the level of affordable housing needed within the district is questionable because of the track record of the developer bringing the housing forward at Red lodge. * The employment need for the provision of 5ha of additional new land at Newmarket has been ignored * The supporting infrastructure in and around Red Lodge is lagging far behind that of the more sustainable market towns, especially Newmarket. * <i>The housing distribution for Red Lodge and Newmarket needs to be reconsidered and rebalanced.</i> * <i>The majority of housing development should be allocated to the 3 market towns. Failure to do so is contrary to both local planning policy and national policy.</i> <p><i>If the inspector concludes that more housing at Newmarket is not an option, then the housing numbers for the whole district need to be reduced.</i></p> <ul style="list-style-type: none"> * <i>The sites for new employment land in Newmarket need to be allocated as they fall far short of the policy levels.</i> * <i>Development of such large housing numbers should not be undertaken prior to the provision and building of a new primary school at Red Lodge. The sudden growth of the previous school, led directly to the school been placed in special measures. The children of Red Lodge and the surrounding villages deserve the opportunity</i> * <i>The Hatchfield Farm decision is subject of a High Court challenge and FHDC still support the</i> | <p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p> <p>The council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.</p> <p>Employment sites are considered in chapter 6 of the Site Allocations Plan. School provision is considered in the SALP and the Infrastructure Delivery Plan.</p> <p>In light of guidance in paragraph 47 of the NPPF (and its footnotes) there is no 'reasonable prospect' at present that the Hatchfield site will be available for development and can be delivered/developed within the Plan period. There are sufficient alternative available, suitable and deliverable sites to meet the district's housing needs to 2031.</p> | No action required. |

3. Background to assessing the distribution of housing

3. Background to assessing the distribution of housing

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|---|--|---------------------|
| | | <i>development of the site, and therefore the allocation at the Hatchfield Farm site should be retained.</i> | | |
| 24864 - Newmarket Horsemen's Group (NHG) [11392] | Object | <p>3.6</p> <p>The NHG has consistently raised concerns about the timing of the Infrastructure Delivery Plan and the preparation of the policies within this document. These are not addressed by the latest draft of the IDP, which again has been produced after the policies have been written rather than informing the policies as this paragraph suggests. The NHG considers that this renders the document unsound as it has not been adequately justified.</p> | <p>The IDP is an evolving and iterative document, and this version has been informed by continuing dialogue with infrastructure and service providers and the study updates commissioned in 2015 and 2016. It indicates that at the strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed in the SIR.</p> <p>Work will continue with infrastructure and service providers, and with neighbouring authorities and statutory bodies to produce a final version of the IDP following examination and adoption of the SIR and SALP.</p> | No action required. |
| | | <i>The issues identified in the representations to the HRA need to be appropriately addressed to allow for the statement made in paragraph 3.6 to be retained.</i> | | |
| 24923 - The Brandon Strategic Land Development Limited Company [13124] | Object | <p>*****LATE SUBMISSION*****</p> <p>3.15 - see attached</p> | No evidence is provided in the representation, or has since been submitted to the council, to demonstrate that the Breckland SPA constraints can be overcome. | No action required. |
| 24620 - Norfolk County Council (Ms Laura Waters) [11365] | Support | 3.15 - 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. | The comments are noted. | No action required. |

3. Background to assessing the distribution of housing

3. Background to assessing the distribution of housing

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|----------------------|--|------------------------------------|----------------------|
| 24884 - Natural England (Cheshire) (Ms Francesca Shapland) [12637] | Support | <p>Your authority will be aware that Natural England provided detailed comments at the Preferred Options stage and furthermore has provided advice and often had detailed discussion with the council regarding the capacity of any of the settlements in sensitive areas, including Lakenheath, Brandon and Red Lodge. We are therefore confident that where there is potential for designated sites to be affected, appropriate mitigation has been agreed. Therefore whilst we note that the housing allocations within the proposed submission places a relatively high level of development within environmentally sensitive areas such as Mildenhall and Red Lodge, Natural England is satisfied that any environmental constraints have been taken into account.</p> <p>Therefore we do not have detailed comments regarding the Single Issue Review document but have commented in detail on the Habitats Regulations Assessment for the site allocations below to clarify our position on the conclusions of the Appropriate Assessment and information provided.</p> | The comments are noted. | No action required. |
| 24808 - Newmarket Town Council (Mr John Morrey) [12910] | Support | <p>3.17 - Newmarket Town Council supports the proposed level of additional 321 homes in Newmarket up to 2031 and this in accordance with the Town Council's previous representation.</p> <p>Newmarket is a special and individual town due to its international importance within the horse racing industry and requires a considerate and sensitive approach to planning</p> | The comments are noted. | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|---|---------------|---|---|---------------------|
| 4. Policy CS7 Overall housing provision and distribution | | | | |
| 4. Policy CS7 Overall housing provision and distribution | | | | |
| 24624 - Mrs W Vale [12861] | Object | Some form of recognition/allowance must be made either in the local plan text or in amendments to frameworks to facilitate smaller scale, controlled residential development in smaller settlements. | <p>To allocate urban extensions to smaller settlements would be contrary to Policy CS1 of the adopted Core Strategy.</p> <p>The Joint Development Management Policies document contains policies which permit small scale development in rural areas subject to meeting certain criteria.</p> | No action required. |
| 24913 - Merlion Capital [12926] | Object | <p>Our assessment is that there is additional capacity within the District and we will demonstrate this below in regard to our client's site. The Council must not ignore suitable and deliverable opportunities which may be recognised by the Inspector at a later date and in turn jeopardise the success of the plan in terms of soundness.</p> <p><i>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 small over-provision of 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) to demonstrate that the plan has been positively prepared. A sensible approach would be to distribute the additional figures to the most sustainable locations within the District, such as Mildenhall, to those sites that have been demonstrated, by technical evidence, as deliverable.</i></p> | There are sufficient sites identified in the Site Allocations Local Plan to meet the distribution set out in Policy CS7. | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|--|--|---------------------|
| 24621 - Mr & Mrs R Lewis [5666] | Object | Some form of recognition/allowance must be made either in the local plan text or in amendments to frameworks to facilitate smaller scale, controlled residential development in smaller settlements | <p>To allocate urban extensions to smaller settlements would be contrary to Policy CS1 of the adopted Core Strategy.</p> <p>The Joint Development Management Policies document contains policies which permit small scale development in rural areas subject to meeting certain criteria.</p> | No action required. |
| 24675 - Lakenheath Parish Council (Ms C Shimmon) [12422] | Object | <p><i>Some form of recognition/allowance must be made either in the local plan text or in amendments to frameworks to facilitate smaller scale, controlled residential development in smaller settlements</i></p> <ul style="list-style-type: none"> * Market Towns are able to absorb a higher level of growth than promoted because of the infrastructure in place over the larger Villages proposed. * This impacts the affordable housing being provided but not in the areas of work requiring suitable transport links * Infrastructure deficit felt by all the Villages * Primary Education provision <p><i>Greater levels of growth need to be allocated to Newmarket and the market towns within the district. Housing should follow a sequential approach to development. The Hatchfield farm site should be retained.</i></p> | <p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p> <p>In light of guidance in paragraph 47 of the NPPF (and its footnotes) there is no 'reasonable prospect' at present that the Hatchfield site will be available for development and can be delivered/developed within the Plan period. There are sufficient alternative available, suitable and deliverable sites to meet the district's housing needs to 2031.</p> <p>The council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.</p> | No action required. |

4. Policy CS7 Overall housing provision and distribution

4. Policy CS7 Overall housing provision and distribution

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|--|--|---------------------|
| 24722 - Hills Residential Ltd [12651] | Object | <p>Object. See page 11-13 of the attached document.</p> <p><i>Amend Policy CS7 to read - 'To meet Forest Heath's full and objectively assessed need for housing, provision is made for 6800 - 7600 new dwellings and associated infrastructure to be delivered in the period 2011-2031 Include site RL/07 and other deliverable sites to meet this need.' Amend Red Lodge Additional provision to 1,210, amend Red Lodge Totals to 1,910.</i></p> | <p>The SHMA update 2016 demonstrates a need to provide 6800 dwellings in the plan period.</p> <p>There are sufficient available, deliverable sites to meet this need as set out in the 2017 Submission SALP.</p> | No action required. |
| 24893 - Gerald Eve LLP (Ms Vanessa Harrison) [12885] | Object | <p>An additional allocation at L/28, for c. 100 homes, would keep Lakenheath within the 975 upper limit of additional growth as set out within the 2015 Single Issue Review (SIR) of Core Strategy Policy CS7 - Further Issues and Options (2nd Regulation 18 Stage) and reproduced in figure 6.1 of the Sustainability Assessment (SA). Furthermore, an allocation at Lakenheath would be appropriate and would reduce the pressure on the smaller primary villages as well as Red Lodge, which has a high growth provision of 1129 homes. Therefore, it is considered that there is merit in identifying and designating additional allocations in the town.</p> <p><i>Wording of CS7 should be amended to reflect this additional allocation (site L/28) in the town.</i></p> | <p>There are sufficient sites identified in the Site Allocations Local Plan to meet the distribution set out in Policy CS7.</p> <p>Site L/28 is deferred in the November 2016 Omission Sites document.</p> | No action required. |
| 24747 - Defence Infrastructure Organisation (Mr Mark Limbrick) [13094] | Object | <p>Within this document the MOD, on the basis of the Military Aviation Noise Contour Report for RAF Lakenheath (24th February 2017) objects to the following:</p> <p>c. Policy CS7 - Overall Housing Provision and Distribution</p> <p>It is DIO's contention that the Council should reconsider the overall provision and distribution of housing in the District in line with the requirements of the NPPF Paragraph 123, the supporting Planning Practice Guidance Paragraph 3 and in line with the requirements of the Explanatory Note of the Noise Policy Statement for England.</p> | <p>Noted. DIO have withdrawn this objection. See Statement of Common Ground between the DIO and FHDC dated 18.8.17.</p> | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|--|--|---------------------|
| 24940 - The Earl of Derby [5831] | Object | <p>The distribution of housing allocations in the pre-submission version of CS7 fails all four tests of soundness.</p> <p>The adopted Core Strategy seeks to focus most development in the market towns. In contrast, the proposed CS7 distribution allocates more housing to the Key Service Centres than the Market Towns. In particular, Newmarket, as the largest and most sustainable settlement, only receives 7.2% of the allocations which does not reflect the pattern of environmental constraints in the District or deliver sustainable development.</p> <p>The SIR should be modified to, at least, increase the Newmarket housing provision to the 680 units contained in the SIR Preferred Options.</p> <p><i>The housing provision in the SIR should be modified to increase the level of housing allocations in Newmarket to at least the 680 units proposed in the Preferred Options SIR. This would make the SIR sound by proposing a housing distribution more in accordance with the adopted Policy CS1 spatial strategy and one which more accurately reflects the pattern of environmental constraints in the District.</i></p> | <p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p> <p>In light of guidance in paragraph 47 of the NPPF (and its footnotes) there is no 'reasonable prospect' at present that the Hatchfield site will be available for development and can be delivered/developed within the Plan period. There are sufficient alternative available, suitable and deliverable sites to meet the district's housing needs to 2031.</p> | No action required. |
| 24887 - Gladman (Mr Richard Crosthwaite) [13119] | Object | <p>Housing requirement or OAN not arrived at in an NPPF and PPG compliant manner. Housing targets need to be reassessed following reconsideration of OAN.</p> <p>The distribution of overall dwelling numbers to inform site allocations plan are insufficiently flexible. They will not enable the delivery of the housing requirement that is currently identified.</p> | The SHMA update 2016 has demonstrated there is a need to provide 6800 dwellings in the plan period. | No action required. |

4. Policy CS7 Overall housing provision and distribution

4. Policy CS7 Overall housing provision and distribution

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|----------------------|--|---|----------------------|
| 24867 - Newmarket Horsemen's Group (NHG) [11392] | Object | <p>The broad allocation of numbers to Newmarket should be a fixed limit in recognition of the need to protect the horse-racing industry, which is acknowledged by the Council and justified by existing and emerging evidence base documents.</p> <p><i>The number of units allocated for Newmarket should be expressed as a fixed limit in recognition of the constraints that the Site Allocations Local Plan acknowledges as being relevant for this town. The absence of reference to these known constraints is a flaw in this plan. Fixing the number of units in light of these constraints is justified by the evidence available and will ensure that sustainable development can be delivered in this settlement</i></p> | The housing requirement is set as a minimum in Policy CS7 which accords with the NPPF. | No action required. |
| 24799 - Elveden Farms Ltd. [13111] | Object | <p>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. A higher housing target would also 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.</p> <p><i>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.</i></p> | The SHMA update 2016 demonstrates there is a need to provide 6800 dwellings in the plan period. | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|---|---|---------------------|
| 24736 - The EG Lambton 1974 Settlement (Mr George Lambton) [13104] | Object | <p>The distribution of housing within Policy CS7 is unsound because the total provision for Newmarket does not accord with its position as the largest and most sustainable settlement in the district. Policy CS7 is not positively prepared as it does not meet the OAN for Newmarket especially for affordable housing. The reduction in provision for Newmarket, from the level included at the preferred option stage, is not justified. It is not the most appropriate strategy, when considered against the reasonable alternatives. Other available sites should be allocated to maintain provision at the previous level.</p> <p><i>Additional sites should be allocated in Newmarket to reclaim a proportion of the overall provision for Newmarket, as envisaged at the Preferred Option Stage of the SIR. Detailed submissions were made at the Preferred Options Stage to show how Site N18 is capable of delivering around 200 residential units. The additional provision for Newmarket within Policy CS7 should therefore be increased by 200 units to 521.</i></p> | <p>Noted. Site N/18 is deferred in the November 2016 Omission sites document, as the site would result in the loss of valued community open space (designated formal open space).</p> <p>There are sufficient sites identified in the Site Allocations Local Plan to meet the distribution set out in Policy CS7.</p> | No action required. |
| 24738 - Hopkins Homes Ltd [13102] | Object | <p>In summary, we have a number of concerns with Policy CS7. The housing target does not make any allowance for unmet needs from neighbouring authorities. The majority of the sites included in the additional housing provision target for the primary villages already have planning permission and will be delivered in the short term, and as such no allowance is made to meet housing needs in the medium and longer term in this category of village.</p> <p><i>We request the following changes to Policy CS7:</i></p> <ul style="list-style-type: none"> <i>* To assess level of unmet housing and affordable housing needs from Cambridge and South Cambridgeshire, and make appropriate upward adjustments to the housing target;</i> <i>* To increase the housing target for primary villages to include an additional 70 dwellings at Land east of Gazeley Road in Kentford.</i> | <p>The council has worked with neighbouring authorities through the duty to cooperate and there is no evidence to suggest that Forest Heath should take other authorities unmet need.</p> <p>To increase the housing target in primary villages would be contrary to Policy CS1 of the adopted Core Strategy.</p> | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|---|--|---------------------|
| 24612 - Dalham Parish Council (Mrs J Kirk) [6485] | Object | <p>The Parish Council objects to the soundness of the policy which allocates which areas take the most housing as there is an imbalance in the proposed distribution of housing in Forest Heath. The Parish Council believes that housing should be sustainable and located near areas of employment.</p> <p>It is surprising that Newmarket is going to have fewer new homes than Red Lodge and Kentford which have already seen a lot of development. Building houses in rural locations will impact on the local infrastructure, particularly roads and schools as workers will need to commute to get to work. The impact of this housing will affect surrounding villages like Dalham as there will be an increased volume of through traffic and could result in further congestion in towns and cities. The most sustainable places in Forest Heath are Newmarket, Mildenhall and Brandon and they should be allocated the bulk of the housing.</p> <p><i>To overcome this objection, the Local Plan should have a fairer distribution of housing which reduces the pressure on places like Red Lodge and Kentford and meets the criteria of sustainability.</i></p> | <p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p> <p>The council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.</p> | No action required. |
| 24924 - The Brandon Strategic Land Development Limited Company [13124] | Object | <p>*****LATE SUBMISSION*****</p> <p>see attached</p> <p>*****LATE SUBMISSION*****</p> <p><i>amend the first part of CS7 relating to 'provision' to add a 20% supply buffer above the OAHN</i></p> <p><i>amend the second part of Policy CS7 relating to 'broad distribution' to include the allocation of land to the west of Brandon for 1042 homes</i></p> | <p>There are sufficient sites identified in the Site Allocations Local Plan to meet the distribution set out in Policy CS7.</p> <p>No evidence is provided in the representation that the Breckland SPA constraints can be overcome to allow development to the west of Brandon.</p> | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|--|--|---------------------|
| 24674 - Rural Parish Alliance (Mr Bill Rampling) [12706] | Object | <p>Does not follow sequential development</p> <p>Infrastructure exists in Newmarket to support greater housing numbers</p> <p>The allocation of the Hatchfield farm site should be retained</p> <p>Housing numbers for Newmarket are too low</p> <p>Such a small amount of market housing at Newmarket will not provide the affordable housing levels required there.</p> <p>There will be an increase in traffic to Newmarket from residents seeking services there if such high development is directed to the rural villages.</p> <p><i>Greater levels of growth need to be allocated to Newmarket and the market towns within the district.</i></p> <p><i>Housing should follow a sequential approach to development</i></p> <p><i>The Hatchfield farm site should be retained.</i></p> | <p>Noted. There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p> <p>In light of guidance in paragraph 47 of the NPPF (and its footnotes) there is no 'reasonable prospect' at present that the Hatchfield site will be available for development and can be delivered/developed within the Plan period. There are sufficient alternative available, suitable and deliverable sites to meet the district's housing needs to 2031.</p> <p>The council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.</p> | No action required. |
| 24931 - Historic England (Alice Eggeling) [13126] | Object | <p>As per our written response dated 30 June 2016, Historic England have no express preference on the distribution of housing delivery across the district but will expect that all developments make appropriate and positive provision for the historic environment.</p> <p>We would caution that a numerical allocation of housing to any one particular settlement does not mean that a settlement can automatically support that allocation. Where provision of housing would unacceptably harm the historic environment, Historic England will not support development even where it accords with the figures set out in Policy CS7. We encourage that masterplans and developments be accompanied by Heritage Impact Assessments to identify opportunities for enhancement of the historic environment and the delivery of housing which appropriately reflects heritage assets and their settings.</p> | The comments are noted. | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|---|---------------|--|--|---------------------|
| 24809 - Newmarket Town Council (Mr John Morrey) [12910] | Object | <p>Newmarket Town Council is concerned in regard to the Council's approach to RAF Mildenhall in the preparation of this document.</p> <p>The document acknowledges that the site will come available by 2023 and hence within the plan period but otherwise the development potential of RAF Mildenhall is ignored in this document.</p> <p>The document states a commitment to a Local Plan Review in 2018 but reasonable development alternatives should be considered now and a commitment to review the Local Plan in 2018 should be policy as opposed to a commitment</p> | <p>Until there is certainty from the MoD over the future uses at RAF Mildenhall and their deliverability and timescales for bringing the site forward, it is not possible to include the site in the Plan or consider it as a reasonable alternative.</p> <p>The commitment to do a review of the Local Plan is set out in the council's Local Development Scheme (June 2016). The work will be programmed into a revised LDS and the work scoped out following the adoption of the FHDC Local Plan.</p> | No action required. |
| 24677 - Moulton Parish Council (Mr Bill Rampling) [12007] | Object | <p>No objectively assessed infrastructure requirements. Combined with East Cambs the there could be development approaching 3000 homes in the plan period but no new transport infrastructure is proposed.</p> <p>Parish are in support of CS1 but the current proposals are a reversal of this.</p> <p>The plan does not show effective joint working.</p> | <p>The council has worked with neighbouring authorities under the duty to cooperate as seen in the DTC statement (January 2017).</p> <p>In relation to CS1, There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p> <p>The council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.</p> | No action required. |
| 24801 - Heritage Developments Limited [12672] | Object | <p>OAN needs to be revisited to address affordable housing needs and to accommodate unmet demand from Cambs.</p> <p><i>Seek to allocate more sites in sustainable locations such as Exning and Kentford.</i></p> | <p>The SHMA update 2016 demonstrates there is a need to provide 6800 dwellings in the plan period.</p> <p>The council has worked with neighbouring authorities through the duty to cooperate and there is no evidence to suggest that Forest Heath should take other authorities unmet need.</p> | No action required. |
| 24856 - Suffolk County Council (Mr Robert Feakes) [6500] | Support | See attached letter on Transport, Education, Fire and Rescue issues. | The comments are noted. | No action required. |

4. Policy CS7 Overall housing provision and distribution

4. Policy CS7 Overall housing provision and distribution

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|---|---------------|---|--|---------------------|
| 24855 - R J Upton 1987 Settlement Trust [12681] | Support | <p>The Trust notes that the Council has carried forward the total housing provision figure of 6,800 dwellings for the period 2011 to 2031 from the Preferred Options stage to the current Submission document, notwithstanding the detailed arguments put forward at the previous consultation stage for a figure of 7,700 dwellings.</p> <p>The Trust does not wish to put this case again in the current round of plan making. However, we note that the Council proposes to draft a new local plan jointly with St Edmundsbury District Council. We would urge the Councils to embark on the review as soon as possible, and wish to take part in this process from the beginning</p> | <p>The SHMA update 2016 demonstrates there is a need to provide 6800 dwellings in the plan period.</p> <p>The commitment to do a review of the Local Plan is set out in the council's Local Development Scheme (June 2016) and will be programmed into the LDS timeline in due course.</p> | No action required. |
| 24844 - Crest Nicholson (Eastern) [11393] | Support | <p>Crest Nicholson notes that the Council has carried forward the total housing provision figure of 6,800 dwellings for the period 2011 to 2031 from the Preferred Options stage to the current Submission document, notwithstanding the detailed arguments put forward at the previous consultation stage for a figure of 7,700 dwellings.</p> <p>Crest Nicholson does not wish to put this case again in the current round of plan making. However, we note that the Council proposes to draft a new local plan jointly with St Edmundsbury District Council. We would urge the Councils to embark on the review as soon as possible, and wish to take part in this process from the beginning.</p> | <p>The SHMA update 2016 demonstrates there is a need to provide 6800 dwellings in the plan period.</p> <p>The commitment to do a review of the Local Plan is set out in the council's Local Development Scheme (June 2016) and will be programmed into the LDS timeline in due course.</p> | No action required. |
| 24742 - Persimmon Homes Ltd (Miss Sophie Waggett) [12423] | Support | <p>Please see the attached.</p> <p>Boyer Planning appointed as agent for reps 24741 and 24742 as per email received from Programme Officer on 16.05.2017</p> | <p>There are sufficient sites identified in the Site Allocations Local Plan to meet the distribution set out in Policy CS7.</p> | No action required. |
| 24633 - East Cambridgeshire District Council (Mr Richard Kay) [12883] | Support | <p>East Cambridgeshire District Council has no objections to the proposed Policy CS7</p> | <p>The comments are noted.</p> | No action required. |

| <i>Representations</i> | <i>Nature</i> | <i>Summary of Main Issue/Change to Plan</i> | <i>Council's Assessment</i> | <i>Action</i> |
|--|---------------|--|-----------------------------|---------------------|
| 24935 - Breckland District Council (Stephen Ottewell) [12936] | Support | <p>Breckland Council raises no concern in respect of Forest Heath District Council's housing distribution options now propose a low scale of growth, 2% (70 dwellings) for Brandon.</p> <p>Breckland Council welcomes that approach and the acknowledgment that before any more ambitious scale of development is proposed significant further evidence is required to address such matters as:</p> <ul style="list-style-type: none"> * Environmental impact on the Brecks and other ecologically sensitive habitats * Flooding * Landscape impact and the issues of avoiding any coalescence between Brandon and Weeting or undue harm to the landscape setting of either settlement * Analysis of the need for a relief road for Brandon post the dualling of the nearby A11 | The comments are noted. | No action required. |
| 24866 - South Cambridgeshire District Council (Mrs Caroline Hunt) [6274] | Support | <p>South Cambridgeshire District Council supports a housing requirement of 6,800 dwellings for Forest Heath between 2011 and 2031, as this is based on:</p> <p>(i) the Strategic Housing Market Assessment for the Cambridge Housing Market Area, which is also being used to inform the objectively assessed need included in the South Cambridgeshire Local Plan; and</p> <p>(ii) two additional updates specifically related to Forest Heath to consider any adjustments, which have been prepared by the Research Group at Cambridgeshire County Council and Peter Brett Associates in a similar way to the recent update undertaken specifically for Cambridge and South Cambridgeshire.</p> <p>South Cambridgeshire District Council supports the identification of sites for allocation that combined with the homes already completed, homes with extant planning permission, and anticipated homes on windfall sites, have the capacity to deliver the district's</p> | The comments are noted. | No action required. |