

Core Strategy Policy CS7 Single Issue Review Issues and Options (Regulation 18) Consultation

Public Participation Report

Introduction and background to the Core Strategy and Single Issue Review of Policy CS7

1.1

Representations

Nature Summary of Main Issue

Council's Assessment

Action

Introduction and background to the Core Strategy and Single Issue Review of Policy CS7

1.1

20481

Comment Concerned that the facts and figures in the document are not a true reflection of the needs of the area, taking into account the period of recession, changing government policies in relation to affordable housing etc.
Newmarket is the Historic Home of Horseracing. Concerned that building more houses will unbalance the very careful relationship between horseracing and people. More houses means more people, more cars, more traffic not conducive for trainers and owners to either use Newmarket or for some to even stay working in Newmarket. Not happy to take a huge percentage of the Districts housing allocation which would destroy Newmarkets unique character.

With regard to facts and figures, Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. In accordance with the adopted Core Strategy, Policy CS1, Newmarket will be expected to take its fair share of new homes, being identified as one of our 3 'market towns', (Core Strategy Policy CS1), and as a consequence deemed capable of accommodating development sustainably. A balance between growth and safeguarding the horse racing industry will be sought through the application of the Council's Local Plan Horse Racing Policies and the Site Allocations process.

No action required.

20468

Comment Query relating to a site in Beck Row.

This is a general query with regard to a specific site in Beck Row and is unrelated to the Single Issue Review process.

No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20458	Comment	<p>Housing growth should match jobs growth where environmental capacity allows. Housing supply needs to reflect economic circumstances and be flexible enough to accommodate fluctuations in demand. We believe that scenario 2 is unbalanced and unsustainable. Historic patterns of delivery do not reflect growth in local employment opportunities and may encourage unsustainable trips to work. Past economic growth may not be a good indicator for the future and could result in over-provision. Housing must reflect local employment growth with regard to environmental capacity. The society believes that past evidence suggests we should plan for a lower rate of housing delivery and in the event that the economy 'bounces back' these figures could be revised. Brandon is heavily constrained in terms of environmental and economic constraints. The housing targets for Brandon should be reduced accordingly. 1,320 homes for Mildenhall represents over provision with regard to prevailing environmental and economic conditions. 1,620 homes for Newmarket represents over provision with regard to prevailing environmental and economic conditions. 660 homes in Lakenheath represents over provision with regard to prevailing environmental and economic conditions. 790 homes in Red Lodge represents over provision with regard to prevailing environmental and economic conditions. 570 homes in the primary villages represents over provision with regard to prevailing environmental and economic conditions. The housing strategy needs a delivery period but perhaps not an end date. An annual target must be set but must be responsive to prevailing economic conditions.</p>	<p>The Single Issue Review will attempt to balance jobs and housing growth and this was offered as a scenario for growth within the context of the consultation document. The allocations for the settlements will be based on a robust assessment of local needs whilst having regard to the inherent environmental constraints. Potential impact on the environment will be identified and mitigation sought within the context of the SA/SEA and HRA processes. The Council will monitor housing delivery on an annual base and it is accepted that the prevailing economic conditions will impact on delivery year-to-year.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20524	Comment	Housing growth should not match jobs growth, nor should we meet all affordable housing needs. Housing provision should continue at the current building rate but be less than the proposed 7011 homes. This allows for modest growth in housing without damage to our environment. Supports proposed scale of growth in Mildenhall, Red Lodge and Primary Villages in particular Beck Row and West Row.	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Mildenhall as one of 3 market towns identified for sustainable development and Red Lodge as a Key Service Centre suitable for an appropriate scale of development. The scale of development allocated to each of the settlements will be taken into account at the next stage of the Local Plan process and will be guided by policy CS1, (Spatial Strategy).	No action required.
20442	Comment	The Council would be justified in retaining the overall level of development. To revisit the overall level of growth would require wider consideration of needs and demands across a broader sub-region through the Strategic Housing Market Assessment, (SHMA). This would be more appropriate once the results of the 2011 Census are fully understood and it might be dealt with in the context of a full review of policy CS7 in due course. The County Council will be pleased to assist in evidence relating to infrastructure. The spatial distribution of homes and jobs needs to be linked.	It is accepted that the Single Issue Review must be based on a thorough and robust assessment of local needs, (NPPF). Information to assist in infrastructure planning will be gratefully received at the appropriate stages and will be particularly useful within the context of CIL and the Site Allocations processes. There is a realisation that the spatial distribution of jobs and homes must be linked to prevent an imbalance and this underpinned the Core Strategy document's development and is informing the Single Issue Review process.	No further action required at this stage.
20454	Comment	Herringswell Parish Council disagree with the housing numbers and feel that there should be a review of the figures in order to bring down the numbers due to the current economic climate. We support the views of the Suffolk Preservation Society and the Five Villages Preservation Trust.	Analytics Cambridge have refreshed the evidence base, October 2012, with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Your support for the above organisations is noted.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20514	Comment	Housing growth should match jobs growth. Affordable housing should not be the most important factor. We should build less homes than now and less than 7011. There should be more homes in Brandon, Mildenhall and Red Lodge and less in Newmarket. Also there should be less homes than 175 in Exning because there are 8 training yards, world reknowned Equine Hospital, studs and narrow roads which make it unsuitable for large scale development. Similarly with Kentford as only one exit towards Bury as other direction takes traffic through Newmarket. Should cut the Plan period.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. With regard to Exning and Kentford, as with the other settlements identified for allocations, the scale of development will be taken into account at the next stage of the Local Plan process and this will be guided by the spatial strategy, (Policy CS1 of the Core Strategy). Any allocations will be underpinned by a thorough assessment of infrastructure requirement(s) including an assessment of the capacity of the local road network to accommodate growth.	No action required.
20460	Comment	Save Historic Newmarket considers Newmarket has a unique character as a result of the horse racing industry. See detailed representation. SHNAG considers the household projections may be incorrect and need to be reconsidered. They do not consider 1620 homes is about right for Newmarket. They have major concerns that increasing housing may reduce the viability of employment within the horse racing industry. Also concerned that not all the key planning constraints are shown for Newmarket eg Chippenham Fen, SAC water abstraction issues or Horse Racing Policy. It is also considered the constraint zones in other settlements in Brandon, Lakenheath, Red lodge and Kentford have been overstated.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Newmarket being the largest and most sustainable settlement in accordance with Policy CS1 will need to take its appropriate share of development. The constraints for Newmarket as identified by the respondent are largely key designations of external bodies whilst the Horse Racing Policy is already adopted Forest Heath Policy and is referred to in the text of the Issues and Options Document. Further consideration will be given to the Chippenham and SAC water extraction issues at the next stage of the Local Plan process and ceratinly within the context of the requisite HRA that will inform it. It is not considered that the constraint zones in other settlements such as Brandon, Lakenheath, Red lodge and Kentford have been overstated and in relation to the SPA designations, the Authorities approach is consistent with Policy CS2 of the Core Strategy in addition to guidance from Natural England.	No Action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20511	Comment	Enquiring when ground will be available in Newmarket to build bungalows for people with severe learning difficulties. Our daughter has been on the housing waiting list for years.	This stage of the Local Plan process is about overall scale of development and the broad development strategy rather than the identification of specific sites to facilitate 'special needs' housing.	No action required.
20503	Comment	Housing growth should match jobs growth in the locality, not for Cambridge etc. Provision of affordable housing is important but 30% makes it difficult for developers to make a profit, and therefore other housing more expensive. Should build at the proposed scale of 7011 homes. Proposed scale of 760 and 1320 homes is about right for Brandon and Mildenhall respectively. Should build fewer homes in Newmarket. The latter is already congested with traffic causing problems to the horse racing industry. Work with neighbouring authorities to take extra housing. Consider there should be more homes in Lakenheath and less in Red Lodge due to lack of facilities. Also should be more homes in Primary Villages in particular Beck Row and West Row to take pressure off Newmarket. However fewer in Exning and Kentford. Should not cut the Plan period.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The scale of development in Newmarket and the other settlements that will receive housing allocations will be further considered at the next stage of the Local Plan process. It is important to note that Policy CS1, (Spatial Strategy), has been retained and as a consequence this will continue to guide allocations based on the relative sustainability of each settlement.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20462	Comment	<p>Representation on behalf of Earl of Derby, owner of Land at Hatchfield Farm, Newmarket. See detailed representation.</p> <p>Up to date evidence indicates a need for a significantly higher annual housing provision than the RSS figure of 370 dwellings per annum.</p> <p>The unchallenged spatial strategy means that the majority of greenfield housing will be directed to the market towns of Newmarket, Mildenhall and Brandon. Newmarket is acknowledged as the most sustainable of the market towns.</p> <p>All three market towns experience a high level of constraints.</p> <p>Once horse racing policies are taken into account, Hatchfield Farm is the only sustainably located, unconstrained greenfield site in Newmarket.</p> <p>All the above factors suggest the original CS7 distribution which included a broad location of growth to the north east of Newmarket in the vicinity of Hatchfield Farm remains both evidence based and sound.</p>	<p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.</p> <p>Comments noted in relation Secretary of State's agreement with his Inspector that the Hatchfield site:</p> <ul style="list-style-type: none"> -would not justify refusal on highway impact grounds (para.13) -would not affect the horse racing industry, the local economy or the historic character of Newmarket (para.14) -would generally comply with the policies of the Development Plan <p>This will be taken into consideration at the next stage of the Local Plan process.</p>	No action required.
20505	Comment	<p>Housing growth should not match jobs growth as there is no indication we are housing for local people or local jobs. Affordable housing for local people is very important but should not be the main consideration. We should be building less homes than now and less than 7011. The economy has stalled and so should housing. Should build more homes in Red Lodge and in Brandon a bypass is essential. Should build fewer homes in Newmarket as it is renowned world headquarters for horseracing. It also has outstanding environment for wildlife and natural assets that need protection.</p> <p>Should not cut the plan period.</p>	<p>Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns capable of accommodating growth sustainably although horseracing and other environmental constraints will need to be taken into account when establishing the level of growth. The scale of development in the other settlements, including Red Lodge, will be taken into account at the next stage of the Local Plan process. The Single Issue Review process will consider an additional allocation for Brandon based on the delivery of a relief road, (as was the case with the 'original' policy CS7).</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20500	Comment	Housing growth should continue to match jobs growth, but should all be affordable and provided for locals. We are becoming over populated and we should be building at a lower rate than now. Water levels critical also hospitals and schools can't cope. Should be less homes in Lakenheath and Primary Villages than currently proposed as there are no jobs and no prospects. We should not reduce the plan period	Comments noted. With regard to scale of growth Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. The scale of development in Lakenheath and the Primary Villages will be further considered at the next stage of the Local Plan process. The spatial distribution of growth will be subject to a thorough assessment of infrastructure requirements as was the case with the original Core Strategy Policy CS7. There is an embargo on new development in Lakenheath until such a time as improved Waste Water Treatment capacity can be provided.	No Action required.
20471	Comment	It is recommended that a new housing target should be 11000 to 2031 as housing provision is the infrastructure which underpins the economic prosperity of an area. Considers the the role of Key Service Centres and Primary Villages should be embellished to accommodate more growth with a redistribution of housing in percentage terms recognising the constraints of Newmarket and Brandon. Promotes two sites for development, land at Greenhays Farm, Green Lane, Red Lodge and land at Kentford Lodge, Herringswell Road, Kentford. See appendix for details.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. The Single Issue Review is looking at the overall scale and distribution of growth in the District rather than individual sites but your comments regarding redistribution will be taken into consideration at the Submission stage. Consideration of individual sites will be carried out as part of the Site Allocations Local Plan process at a later stage.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20506	Comment	<p>Housing growth should not match jobs growth. Move jobs to less favoured areas and improve them like Brandon. Affordable housing should be the main consideration. Also should build at the same rate as now and provide 7011 homes.</p> <p>There should be more homes in Brandon, Mildenhall, Red Lodge and Lakenheath. Should be fewer homes in Primary Villages because busy with traffic now. Support for more housing in Beck Row and West Row but fewer in Exning and Kentford. Should cut the Plan period.</p>	<p>Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. The scale of development allocated to each settlements will be further considered at the next stage of the Local Plan process in line with appropriate infrastructure planning to support this growth. Policy CS1, (Spatial Strategy), is retained and this will continue to influence the allocations in accordance with the relative 'sustainability' of each settlement within the hierarchy.</p>	No action required
20502	Comment	<p>Housing growth should not match jobs growth, nor should we meet all affordable housing needs. Housing provision should be lower than current building rate and less than 7011. There should be more homes in Brandon and less in Newmarket. Should not cut the plan period.</p>	<p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.</p> <p>Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The scale of development will be taken into account at the next stage of the Local Plan process.</p>	No action required.
20440	Comment	<p>Support a scenario that provides the most sound basis for gauging and meeting both total and full housing needs with reference to CLG's overall housing needs.</p> <p>Propose a major urban expansion of the same order as contemplated for Mildenhall and Newmarket. A master plan proposes about 2000 dwellings to the northeast of Brandon to be built with an annual average of 118 dwellings and a proposed relief road to be completed in phases by 2031. The submission is accompanied with an email from Natural England which supports in principle mitigation proposals to address HRA environmental constraints.</p>	<p>This is a major proposal which is significantly larger than was originally considered for Brandon. More detailed discussions will need to take place with the proposers of the scheme with regard to viability of building the relief road which is a pre-requisite for this scale of development. Also discussions will need to be had with both Natural England regarding HRA constraints to ensure these can be satisfactorily mitigated and with Breckland District Council regarding the eastern end of the relief road terminating in their local authority area.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20463	Comment	Tuddenham Parish Council endorse the response of the Five Villages Preservation Trust.	Comments noted. Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.	No action required.
20443	Comment	Recognises Forest Heath is unusual in terms of constraints. Also refers to NPPF as providing overarching guidance for drawing up plans, with conservation of the historic environment as a key aspect of sustainable development. Would expect to see careful site analysis and masterplanning as part of positive strategy for achieving conservation and enhancement of the historic environment. Would like to see conservation areas identified as a constraint on the area maps. Considers the baseline information for the historic environment in the Sustainability Appraisal report is brief and could be strengthened with regard to heritage risk.	Welcome support for spatial objectives. Will give consideration to showing conservation areas at the next stage of the process - either the Core Strategy Submission or Site Specific Allocations Further Issues and Options. Sustainability Appraisal is an iterative process and further consideration will be given to the impact of development on the sustainability objectives as the development strategy becomes clearer.	Give consideration to showing extent of conservation areas, (appropriate mapping), within the context of the Core Strategy Submission document or Site Specific Allocations Further Issues and Options document.
20509	Comment	Housing growth should match jobs growth. Also need to provide more affordable housing so that young people can get onto the housing ladder. However, consider we should build less homes than now and less than 7011. Consider there should be fewer homes built in Newmarket as there are no jobs to support proposed level of growth. Do not support proposed level of growth in Primary Villages. They should be considered separately and not lumped together. smaller settlements should have a staggered approach to any development to allow them to absorb development. There should be less than 175 dwellings in Exning. Local school not large enough and traffic problems. No foreseeable employment within the village. Concerned about over concentration of development in North Newmarket and Burwell which will impact on Exning village. Should not cut the Plan period.	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. With regard to Exning, the scale of development will be further considered at the next stage of the Local Plan process. Any allocation for Exning and indeed the other Primary Villages will be informed by a thorough infrastructure appraisal. Policy CS1, (Spatial Strategy), has been retained and will continue to influence the allocation of new housing in accordance with the relative sustainability of each settlement.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20523	Comment	Housing growth should not match jobs growth, nor should we meet all affordable housing needs. Housing provision should be lower than current building rate and less than the proposed 7011 homes. Considers figures are wrong and need to be reassessed. There should be more homes in Brandon as it is crying out for a bypass and less homes in Newmarket. Building 100's of houses in Newmarket is unsustainable and would destroy the horse racing industry that supports the town. Newmarket's horse racing industry is unique in the world. Should not cut the plan period	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket and Brandon are 2 of 3 market towns identified for sustainable development. The appropriate scale of development in both towns will be further considered at the next stage of the Local Plan process alongside consideration of horse racing policies, (Newmarket), and progress with the bypass proposals, (Brandon).	No action required.
20512	Comment	Concerned about the future of Exning, in particular the proposed Burwell Road plans. Burwell Road has become more congested, noisy and unpleasant in recent years with heavy lorries. Tiny bendy roads are not designed all the traffic that now passes through. Problem with water leaks and lack of water pressure for domestic use and for wildlife. Similarly with electricity supply. Negative impact on local horse trainers. Exning is not the place to expand. No body listens to Exning's residents concerns	The purpose of this consultation exercise is to gather views before moving on to the next stage of the Local Plan process. With regard to the Burwell Road planning application this has been submitted separately to the preparation of the Single Issue Review. Separate representations in relation to that application will be considered as part of the application process. With regard to general concerns about traffic impact on the village and other infrastructure capacity, liaison will be undertaken with the appropriate authorities/infrastructure providers to ensure adequate mitigation for growth prior to adoption of the strategy.	No action required.
20513	Comment	No Comments as it does not directly relate to the Commission	Noted	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20518	Comment	<p>Housing growth should match jobs growth, but should not meet all affordable housing needs, this is not the most important factor, others are quality and type of employment. Housing provision should be at the current building rate and we should provide 7011 homes.</p> <p>660 homes in Lakenheath about right, but depends on economic growth. Is Lakenheath to become a commuter village?</p>	<p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Lakenheath as one of 2 Key Service Centres identified for sustainable development. The scale of development within each settlement will be further considered at the next stage of the Local Plan process and it is hoped that employment opportunities will be created within the settlement of Lakenheath itself, including those associated with a new Tesco superstore.</p>	No action required.
20445	Comment	<p>On behalf of Moulton Parish Council See detailed appendix.</p> <p>The overall housing numbers are all too high and unsustainable.</p> <p>The district is heavily constrained and must not be compromised in order to accommodate inflated housing numbers.</p> <p>The housing growth should reflect the changes to our economic conditions rather than the over inflated figures provided from times of economic boom.</p> <p>Do not believe Red Lodge is a sustainable place to locate such a large number of houses in relation Anglian Water situation, HRA designations and lack of services & infrastructure</p>	<p>With regard to housing numbers Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. In relation to Red Lodge we are in discussions with Anglia Water and Natural England regarding scale, location and phasing of development which will inform the next stage of the Local Plan process</p>	No action required.
20447	Comment	<p>Site specific information in relation to SHLAA site K/11, (Kentford), submitted by agent.</p>	<p>Site specific information in support of the inclusion of site K/11 within the context of the SHLAA and Site Allocations documents. The comments will be dealt with within the context of these two documents/planning processes.</p>	No action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20449	Comment	<p>The evidence does not take account of the 2011 Census data releases.</p> <p>No evidence to suggest how the Authority will meet unmet housing needs within other Districts.</p> <p>Crest are currently analysing housing needs and would be glad to share their findings.</p> <p>Several of the higher level settlements are heavily constrained whereas Red Lodge is not so constrained. There is no evidence to suggest that Red Lodge could not accommodate more than the stated 790 dwellings, (table 14). Mitigation for the SPA has been demonstrated in the case of SHLAA site RL/06. It is unreasonable to delay further development in Red Lodge should waste water treatment capacity be addressed. The provision of community facilities in Red Lodge is now at an advanced stage.</p>	<p>In terms of the 2011 Census data, this will be considered within the context of future iterations of the Single Issue Review document as and when it is released.</p> <p>In terms of meeting unmet need in other Districts, we have a duty to co-operate with neighbouring Authorities and unmet need in other areas is and will be considered as we progress the Single Issue Review process.</p> <p>Any information in terms of housing need that Crest can make available will be gratefully received and can be used to inform our own evidence base. It is accepted that a number of settlements are heavily constrained by environmental and physical factors. Red Lodge is no different, (it is subject to the Breckland SPA and waste water treatment capacity issues among other constraints). The Core Strategy, in the case of Waste Water Treatment capacity, is clear in so far that development can come forward as and when the issues have been satisfactorily resolved.</p>	No actions at this stage.
20461	Comment	<p>Natural England welcome the approach that the majority of housing development is located in the larger and more sustainable towns and villages in accordance with Policy CS1.</p> <p>Constraints to development at Brandon, Mildenhall, Lakenheath, Red Lodge and Kentford include land within Breckland SPA and/or Stone Curlew Nest constraint zones. Satisfactory mitigation needs to be demonstrated. Advise HRA screening of potential development sites at an early stage.</p> <p>Additionally at Brandon adequate habitat mitigation needs to be demonstrated in order to bypass the town. Housing development at Lakenheath and Red Lodge is dependent upon waste water capacity constraints and various SSSI's.</p>	<p>Comments noted in relation to numerous environmental constraints. We will continue to work with Natural England, the Environment Agency and Anglian Water as appropriate to address these issues in the most sustainable way whilst providing for development that meets the identified housing needs of the district.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20508	Comment	<p>Housing Growth should match jobs growth. Should not make affordable housing the main consideration. Should carry on building at the same rate and provide 7011 homes. Consider 1620 homes right for Newmarket. Is there room for more brownfield sites rather than greenfield.</p> <p>570 homes in Primary Villages is about right, but hard fitting homes into villages due to lack of facilities. In Exning 175 homes over 19 years allows for gradual growth that the village can cope with. Should not cut the Plan period</p>	<p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. However, there is very little scope for additional brownfield development. The scale of development in all settlements will be further considered at the next stage of the Local Plan process. Core Strategy Policy CS1 has been retained and will continue to guide allocations in accordance with the relative sustainability of each settlement.</p>	No action required.
20473	Comment	<p>Breckland Council welcome the opportunity to discuss cross boundary issues in relation to Brandon under the duty to co-operate with regard to natural environment and infrastructure which directly affect both authorities.</p> <p>Refer to significant constraints surrounding Brandon - Breckland SPA and flood zones. Need for HRA site assessments.</p> <p>Questions reliance on a strategy of mitigation to be provided with the development, when an approach of avoidance has not been demonstrated.</p> <p>With regard to bypass proposal, Breckland Council has not protected a route where it would need to connect into the highway network in Norfolk.</p> <p>Breckland's preferred approach is to support the dualling of the A11 to Thetford and monitor the diversionary effect of an improved A11 on traffic levels using the A1065.</p>	<p>Welcome dialogue on strategic planning matters which affect both authorities.</p> <p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.</p> <p>In this context Brandon will need to take its fair share of development in accordance with adopted Core Strategy CS1. Discussions are ongoing with Natural England regarding a major urban expansion to the north east of Brandon and a related relief road. Current indications are that satisfactory mitigation proposals have been put forward by the schemes promoters with regard to environmental constraints.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20441	Comment	<p>Scenario 1 appears to present a plausible approach as it seeks to balance housing and employment growth. Considers Table 9 is misleading and misguided with regard to new land required and existing commitments.</p> <p>Does not consider the settlement plans/planning constraints shown in settlements other than Newmarket reflect an accurate nature of the constraints described with regard to potential mitigation or compensation proposals. In particular does not consider 'Horse Racing' constraints or Chippenham Fen SSSI have been given sufficient prominence on page 31.</p> <p>Town Council to involve itself in discussions about about meaningful constraints and an objectively assessed housing figure</p>	<p>Note support for balancing housing and employment growth.</p> <p>With regard to Table 9 there is a misunderstanding that housing commitments have already been excluded to arrive at the housing requirement of 5335 dwellings (282 pa), therefore commitments totalling 1330 dwellings have to be added back in to get to the overall requirement of 6665 dwellings (351 pa)</p> <p>The settlement plans/planning constraints represented largely accord with designated constraints of external bodies, whereas the 'Horse Racing' Policy is already given prominence in Forest Heath's Local Plan Documents.</p> <p>We welcome the Town Councils input on the whole document. The SSSI and other areas subject to an environmental designation will be further considered within the context of the requisite HRA that will support the Single Issue Review process.</p>	<p>Consider whether there should be greater emphasis on the horse racing constraints, (Newmarket).</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20482	Comment	<p>0.98 homes to 1 job is not enough. There should be more homes to jobs to take into account other factors such as market and affordable housing needs. A lot of housing would be needed to meet our affordable housing requirements. The viability of such development is becoming a critical issue.</p> <p>The average completion scenario does not take into account recession years as well as large scale development at Red Lodge.</p> <p>We consider that there should be an increase in the overall level of housing being delivered for the District as a whole, (i.e. more than the RSS requirement). There should be an increase in the level of housing provision in Lakenheath.</p> <p>The IECA study indicates that one of the main issues for Lakenheath is that it can only accommodate limited growth because of the waste water treatment works capacity.</p> <p>Since the IECA study was completed, measures have been identified that will ensure that the nature conservation impacts of development on sites to the South/East of Lakenheath could be adequately mitigated.</p> <p>Limited development should be accepted in the smaller settlements to support rural economy and affordable housing needs.</p>	<p>The jobs/homes scenario was used for contextual purposes to provide an indication of what might be an appropriate level of growth, (point noted). Again, the affordable housing scenario was used for contextual purposes. It is agreed that a very large number of homes would need to be provided to meet all of our needs. Retained Core Strategy Policy CS9 seeks requirements for affordable provision within new developments.</p> <p>It is accepted that completion rates will vary year on year and will be dependent on prevailing economic conditions. We will plan for a minimum 15 year period and monitor completions on an annual basis. There is an intention to base any housing requirement on a thorough and objective assessment of housing needs in the District. This needs to be balanced against the inherent constraints to growth acting upon our settlements. This includes the settlement of Lakenheath. The constraint imposed by waste water treatment capacity was identified within the adopted Core Strategy Policy CS7. When these issues have been resolved then additional development can come forward in Lakenheath.</p> <p>Once appropriate assessment has been conducted on those sites with a nature conservation designation that identifies that no harm will arise from development then they can and will be included within the context of the SHLAA and Site Allocations documents. Appropriate development in smaller settlements will be permitted where it is in accordance with other policies within the development plan.</p>	No action required - comments noted.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20515	Comment	Housing growth should not match jobs as there does not appear to be enough jobs for local people. There is an equal need for homes of all types including affordable housing. We should build less homes than current rate and less than 7011. Should build less homes than proposed in Newmarket, we need job creation before homes. Infrastructure in Newmarket cannot cope and the traffic is a serious problem. Should not cut the Plan period	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The scale of development will be taken into account at the next stage of the Local Plan process and will be informed by a thorough assessment of infrastructure requirements, including an assessment of impact on the road network as required.	No action required.
20465	Comment	Gladman Development provide a list of factors to consider in determining housing need within a Local Authority area and offer their services in a consultative basis.	The list of evidence is useful and has been noted as has the offer of assistance from Gladman Developments in progressing our Single Issue Review.	No action required.
20455	Comment	Representation in respect of St Felix Middle School, Newmarket. See detailed appendix. Identified an urgent need for various health and wellbeing facilities, particularly dementia. Promoting a care complex consisting of a dementia unit and care home, an extra care scheme, health centre and a mixed residential development with market executive and social housing.	Subject to Suffolk County Council confirming the site is surplus to educational requirements consideration will be given to the broad mix of residential and health care uses at the next stage of the SIR Local Plan process and within the context of the Site Allocations Local Plan process.	No action required.
20444	Comment	On behalf of the 5 Villages Preservation Trust. See detailed appendix. The overall housing numbers are all too high and unsustainable. The district is heavily constrained and must not be compromised in order to accommodate inflated housing numbers. The housing growth should reflect the changes to our economic conditions rather than the over inflated figures provided from times of economic boom. Do not believe Red Lodge is a sustainable place to locate such a large number of houses in light of the Anglian Water situation, HRA designations and lack of services & infrastructure	With regard to overall housing numbers Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. In relation to Red Lodge we are in discussions with both Anglia Water and Natural England about scale, location and phasing of development. this will inform the next stage of the Local Plan process.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20520	Comment	Housing growth should not match jobs growth, nor should we meet all affordable housing needs. Housing provision should be lower than current building rate and less than 7011 homes. There are insufficient jobs and infrastructure, in particularly water supply and transport both road and rail. There should be more homes in Brandon which needs local development and could become a hub for Tourism. Should be less housing in Newmarket because of lack of infrastructure, traffic congestion and wildlife. Small amount of growth only on brownfield sites. Supports more housing in Red Lodge to support more infrastructure, shops and industry. Do not consider there should be more homes in Primary Villages which do not have the facilities Should cut the plan period but need to plan carefully	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Brandon and Newmarket as 2 of 3 market towns identified for sustainable development. The scale of development within each settlement will be further considered at the next stage of the Local Plan process. Both Brandon and Newmarket are heavily constrained. Progress with mitigation for the SPA and Brandon Bypass will need to be further considered when finalising the housing numbers for Brandon.	No action required.
20480	Comment	The Highway Agency worked closely with FHDC and Suffolk CC in developing the transport evidence base prepared by AECOM November 2009. The report concluded that the housing and employment allocations were unlikely to put unacceptable pressure on the strategic road network. However it recognised that the A14/A142 junction experiences traffic congestion with queuing problems in the peak hours on certain approaches and remains a particular concern to the Agency. New growth in Newmarket would increase traffic pressure on this junction. The Agency entered into a statement of common ground with Suffolk CC and representatives of Earl of Derby to agree a position of 'no objection in principle' to the development to the northeast of Newmarket, subject to mitigation measures for the A14/A142 junction. The Agency's position in relation to SIR remains unchanged from that for the 2010 adopted core strategy assuming the broad locations and proposed allocations for new housing do not differ significantly.	Comments noted. Also welcome progress with the A11 Fiveways to Thetford improvement scheme with main construction due to start January to March 2013.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20446	Comment	Some of the information relating to wastewater infrastructure is out of date and should be superceded with the findings of the Stage 2 Full Strategic Water Cycle Study, (31st October 2011). In particular section 8.2, (page 28), that indicates wastewatwer treatment capacity for Lakenheath and Red Lodge	Comments noted. Information will be updated at the next stage although the Stage 2 SFRA & WCS documents were not fully signed off when the Issues and Options document was drafted.	Use data from the Stage 2 SFRA and WCS at the next stage.
20507	Comment	Housing growth should not match jobs growth, nor should we meet all affordable housing needs. Housing provision should be lower than current building rate and less than 7011. There should be less homes in Newmarket. Should not cut the plan period.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The scale of development will be taken into account at the next stage of the Local Plan process.	No action required.
20504	Comment	Housing growth should not match jobs growth, nor should we meet all affordable housing needs. Housing provision should be lower than current building rate and less than 7011. There should be less homes in Newmarket. Should not cut the plan period	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The scale of development will be taken into account at the next stage of the Local Plan process.	No action required.
20525	Comment	Housing growth should not match jobs growth, nor should we meet all affordable housing needs. Housing provision should be lower than current building rate. However should provide for the proposed 7011 homes. There should be less homes in Newmarket and the Primary Villages in particular Kentford. The main reason given was traffic. Should not cut the plan period.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The scale of development in the Primary Villages will be taken into account at the next stage of the Local Plan process.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20464	Comment	<p>In Newmarket we should only build houses on brownfield sites as historically the main trade is Horse Racing and Studs. Greenfield land should be kept for growing food for horses and training horses or for sport for young people.</p> <p>We do not require any more supermarkets, need to encourage shops in the High Street for people to work and spend in.</p> <p>As people die homes are available for people to rent or buy. Newmarket is big enough.</p> <p>There are enough business's in the town providing jobs, Newmarket does not need to expand.</p>	<p>Comments noted. With regard to growth, Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Newmarket will need to take its fair share of new homes in accordance with Core Strategy Policy CS1 as it is one of our more sustainable settlements. In addition, the Strategic Perspectives retail study identifies a need for additional retail provision in Newmarket, (both convenience and comparison floorspace). Therefore a balance will need to be struck between growth and safeguarding both the Horse Racing industry and the High Street.</p>	No action required.
20501	Comment	<p>Housing growth should match jobs growth. Affordable homes should not be the most important consideration, building without jobs increases pressure on infrastructure. We should build less homes than now and need to align jobs with housing. Does not agree with more homes in Brandon without infrastructure.</p> <p>Does agree with more homes in Mildenhall because infrastructure is better.</p> <p>Agrees 1620 new homes in Newmarket is about right, (sustainable infrastructure).</p> <p>Does not agree that 660 homes is about right for Lakenheath, (should be less). What about release of 500 homes at Lord's Walk by USAF in 2018.</p> <p>Should not cut the Plan period</p>	<p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Comments in relation to levels of growth allocated to specific settlements will be taken into consideration at the next stage of the Local Plan process. Any allocation will be underpinned by an appraisal of existing/required infrastructure. With regards to Lord's Walk their is no guarantee that even if these houses are released they will become available to for the general public. We can review in due course as and when the Local Plan is reviewed.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20519	Comment	Housing growth should not match jobs growth, nor should we meet all affordable housing needs. Conflicting views about whether housing provision should continue at the current building rate as they state it should be less than 7011 homes. There should be less homes in Newmarket particularly on greenfield sites otherwise the racing industry will be destroyed. Should not cut the plan period	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The scale of development will be further considered at the next stage of the Local Plan process alongside other considerations and constraints to growth, including the Council's policies with regard to sites in racing related uses.	No action required.
20467	Comment	Request to consider the potential of a parcel of land in Holywell Row for housing.	The allocation of sites and the inclusion of parcels of land for development will be considered via the SHLAA and Site Allocation processes. Holywell Row is a minor settlement and would not be considered for strategic housing allocations as per Core Strategy Policy CS1.	No action required.
20456	Comment	It is recognised that levels of growth higher than the existing Core Strategy are forecast, which could put further pressure on services provided in Bury St. Edmunds. However, at this time the Borough does not have a preferred scenario but is happy to jointly address this at the next stage of the review. A matter of common interest is the Brecks Special Protection Area, (SPA), which places significant constraints on growth. Should significantly higher levels of growth be pursued this will need careful consideration in relation to the SPA.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. We welcome the willingness to work jointly in relation to the Brecks SPA in order to pursue a common approach.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20510	Comment	Housing growth should not match jobs growth. More and more jobs are becoming part-time. Nor should we meet all affordable housing needs. Housing provision should be lower than current building rate and less than 7011. There should be more homes in Brandon which needs a bypass, with less in Newmarket so as not to destroy the delicate balance that exists so far. Should not cut the plan period or have an annual target.	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket and Brandon as 2 of 3 market towns identified for sustainable growth. The scale of development will be established at the next stage of the Local Plan process. The original Core Strategy Policy CS7 made provision for an increased allocation of homes for Brandon subject to the delivery of a relief road.	No action required.
20521	Comment	Housing growth should match jobs growth to contribute to the life and culture of the district. Should not meet all affordable housing needs. Housing provision should be at the current building rate and 7011 homes seems about right. However need to take into account jobs, schools and medical care, shops and transport as well as water supply. There should not be more homes in Brandon as there is little infrastructure, poor shops and jobs. Should not cut the plan period	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Brandon as one of 3 market towns identified for sustainable development, subject to infrastructure improvements. The proposed scale of development will be established at the next stage of the Local Plan process.	No action required.
20516	Comment	Housing growth should continue to match jobs growth, but should not meet all affordable housing needs. Housing provision should be lower than current building rate and less than 7011. There should be less homes in Newmarket in order to support the racing industry. Should not cut the Plan period.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The proposed scale of development in Newmarket will be established at the next stage of the Local Plan process.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20469	Comment	<p>Norfolk County Council does not raise any strategic objection to the Review, but reserves the right to comment further on any strategic cross boundary issues.</p> <p>The only cross boundary issue potentially arising relate to proposed development in Brandon and the possible impact on infrastructure and services in Norfolk. eg relating to transport and education provision.</p> <p>Core Strategy should have regard in its Planning Obligations Policy and/or CIL Policy to the need to address the cross-boundary impacts associated with proposed housing growth.</p>	<p>Comments noted. With regard to cross boundary issues at Brandon we will liaise with both Breckland DC and Norfolk CC with regard to any major urban expansion and related northern relief road, the eastern end of which terminates in Breckland.</p>	No action required.
20448	Comment	<p>SHLAA Site K/11, Animal Health Trust, Land at Lanwade, Kentford</p> <p>1 Ordance Survey base plan is misleading in that it fails to show extensive recent development adjacent to the eastern boundary of above land. Consequently the plan does not show the more intensified existing development on this western side of the settlement which forms this evolved centre of the settlement.</p> <p>2 Site K/11 does not lie within a flood zone and so will not lead to an increase in local flooding</p> <p>3 Site K/11 does not lie within a stone curlew SPA</p> <p>4 Site K/11 is sufficiently distant from the A14 Trunk Road that it will not suffer from Noise pollution</p> <p>Site remains a viable proposal and also avoids the above issues that significantly blight other land proposals within the settlement.</p>	<p>The above comments are noted. Site K/11 is a preferred site in the SHLAA 2nd Review published October 2012. The comments will be taken into account within the context of the Site Allocations Local Plan process.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20453	Comment	<p>Response on behalf of Exning Parish Council. See detailed appendix.</p> <p>Exning is a very old village, its countryside and heritage are very important assets. Any development needs to be of incremental growth with a range of housing types.</p> <p>Exning continues to grow without the need for large scale development.</p> <p>Concerned about traffic impact, impact on Primary School and current antiquated utilities infrastructure. Suggest limiting the number of houses to be built in the village per year to ensure integration and allow the village to absorb growth.</p> <p>Of 6 sites identified (SHLAA E/01-E/06) support small scale development on E/04 land south of Burwell Road.</p>	<p>Exning was identified in the adopted Core Strategy Policy CS1 as one of 4 Primary Villages capable of accommodating sustainable development. The above comments will be taken into consideration at the next stage of the Local Plan process which will set out the overall scale of development required in the district taking into account Analytics Cambridge refresh of the evidence base, October 2012, with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.</p>	No action required.
20457	Comment	<p>Transportation and the supporting infrastructure is a major influence on the distribution of new homes and this is likely to be the case with all of your major settlements. The delivery of infrastructure will be part of this review whether we like it or not because the effectiveness of this document will be tested. We need to work as closely as possible to ensure our evidence bases and positions are aligned.</p>	We have a duty to co-operate with Suffolk CC	No change required.
20459	Comment	<p>Need to take into account long term position of the ongoing presence of the United States Air Force at RAF Mildenhall and Lakenheath.</p> <p>Discussions about relocation of Marshalls Ltd in Cambridge to RAF Mildenhall could result in additional housing requirements, approx. 1000 over and above normal requirements.</p> <p>As such a reserve requirement should be built into the Core Strategy.</p>	<p>Comments noted. At the current time there is no firm indication that Marshalls are likely to move to Mildenhall. However, if this position should change, the implications will be considered at the appropriate time.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20517	Comment	<p>Housing growth should match jobs growth, but should not meet all affordable housing needs. Market forces should prevail. Housing provision should be lower than current building rate and less than 7011. There should be more homes in Brandon, Mildenhall, Red Lodge and Lakenheath which are suited for more development and less in Newmarket which is less suited.</p> <p>Consider 570 homes is about right for Primary Villages. Could be more in Beck Row and West Row with Exning and Kentford about right.</p> <p>Should not cut the plan period</p>	<p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Newmarket as one of 3 market towns identified for sustainable development. The proposed scale of development in all settlements will be established at the next stage of the Local Plan process.</p>	No action required.
20522	Comment	<p>Housing growth should not match jobs growth, nor should we meet all affordable housing needs as figures are estimates. Housing provision should be lower than current building rate and less than 7011 homes as infrastructure is already struggling to cope with current expansion. There should be less homes in Brandon, Mildenhall and Newmarket as well as Lakenheath and Red Lodge.</p> <p>Similarly with Primary Villages. Exning in particular would be totally altered by this scale of development, greatly damaging quality of life.</p> <p>Should not cut the plan period</p>	<p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Core Strategy CS1 identifies Brandon, Mildenhall and Newmarket as 'Market Towns' capable of absorbing growth in a sustainable manner. Lakenheath and Red Lodge are identified as Key Service Centres, again suitable for an appropriate scale of development. The proposed level of growth allocated to all settlements, and including the Primary Villages, will be further considered/established at the next stage of the Single Issue Review process and in tandem with appropriate infrastructure planning.</p>	No change required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20466	Comment	<p>The Single Issue Review needs to take specific local circumstances, such as the unique character of Newmarket, fully into account when considering the amount and distribution of new housing in Forest Heath.</p> <p>The presence of the horse racing industry gives Newmarket its character and is the cornerstone of the local economy. Imposing on the town a level of growth it cannot assimilate will damage the horse racing industry and impact upon local economic prospects. The Newmarket Key Planning Constraints plan does not reflect the range or nature of the factors that affect the capacity of the town to accommodate new housing. This is a serious omission which gives a misleading picture of the potential of the town to take growth.</p> <p>The Consultation fails to consider the constraint upon growth at Newmarket created by the possible significant effect on the ecology of the Chippenham Fen SSSI, a component of the Fenland SAC, a concern expressed by the Secretary of State in his decision letter regarding the Hatchfield Farm appeal. Any strategy for the town must incorporate an assessment of the potential increase in the number of horses in training at Newmarket.</p> <p>The increase in jobs in Scenario 1 is unrealistic. The Analytics Cambridge report refers to a forecast rise in total employment of 3600 jobs (2008-2033), significantly less than the figure of 9125 jobs (2006-2031) referred to in Scenario 1. A more realistic view of future employment prospects will mean a reduced need for more housing.</p> <p>Affordable housing is not the most important factor in the determination of the future housing figure (Scenario 2).</p> <p>The existing level of development, soundly derived from the period since 2001 (the start date of the Core Strategy), is 281 house completions per annum, not 380 (Scenario 3)</p> <p>The Consultation misrepresents the Government's most up-to-date household projections. the 2008-based projections suggest an increase of 9000 households (2006-2033), not 11000 (2006-2031) Looking at all the relevant constraints, Newmarket cannot accommodate an extra 1620 dwellings by 2031. The appropriate figure should be based on a</p>	<p>Welcome the horse racing industries comments and continued dialogue as a key stakeholder.</p> <p>With regard to scale of housing growth, Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range and is considered both an evidence based and sound basis to go forward.</p> <p>With regard to the constraints identified by the respondent, these are mainly designations of external bodies whereas the Horse Racing Policy is already set out in Forest Heath's Local Plan documents and is referred to in the text in the SIR Issues and Options document.</p> <p>Ongoing discussions with Natural England will clarify the position with regard to the Chippenham Fen SSSI, including consideration of any appropriate mitigation measures.</p> <p>With regard to impact on the racing industry the Secretary of State, in his decision letter on the Hatchfield Farm appeal, agreed with his Inspector that the development of 1200 dwellings at the site:</p> <ul style="list-style-type: none"> -would not justify refusal on highway grounds (para. 13) -would not affect the horse racing industry, the local economy or the historic character of Newmarket (para. 14) -would generally comply with the policies of the Development Plan. <p>In this context, as Newmarket is identified in Core Strategy Policy CS1 as one of three 'Market' towns within the settlement hierarchy suitable for sustainable development, it will need to take its fair share of the overall housing requirement, albeit this must be balanced with the constraints to growth acting upon this settlement.</p>	No action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>thorough investigation of all constraints, including the limitations produced by the nature and operation of the horse racing industry.</p> <p>The evidence base does not contain any justification for the content of Appendix 1 of the Consultation which apportions 25.5% of the possible housing growth to Newmarket.</p> <p>The horse racing industry wishes to be viewed as a key stakeholder by FHDC in the evolution of the Single Issue Review, helping to ensure that it reflects a collective vision.</p>		
20472	Comment	<p>The Old Coal Yard, Wilde Street, Beck Row is a brownfield site and should be considered for development.</p> <p>The site is serving no purpose at present and the owners are paying approx. £2000 in council tax. They are now considering returning its use as coal storage and distribution, sorting and storage of fire wood and scrapmetals.</p> <p>A better use of the land should be found.</p>	<p>Comments noted.</p> <p>This stage of the Core Strategy SIR is looking at the overall scale of growth and distribution of development in the District rather than specific sites. This site is not a preferred site for development in the context of the recent SHLAA Review. However, it will be reconsidered at the time of the next SHLAA review and will be considered for development within the context of the Site Allocations LP process.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20470	Comment	<p>Housing growth should continue to meet the growth in jobs.</p> <p>We should make affordable housing requirements an important factor in estimating our future housing requirements.</p> <p>The current rate of housing delivery is far too low.</p> <p>The original plans for new homes, (7,000), should be a minimum.</p> <p>The end date of 2031 should be retained.</p> <p>For Newmarket, the number of new homes to be built by 2031 should be approx. 1,620.</p> <p>We should normally aim to build 400 new home per year in Forest Heath.</p> <p>An increase in residents will help to keep the Town centre vibrant.</p> <p>We need new homes to attract new jobs to the area.</p> <p>Affordable housing can only be provided as a sustainable part of mixed use development.</p> <p>The need for affordable housing must be balanced or we will become a low income area.</p> <p>We should carry on building at the same rate as before if it meets our requirements.</p> <p>We need to consider the number of empty homes that we have.</p> <p>Demand will determine how many dwellings are built - Availability of suitable land will also determine how and when dwellings will be built.</p> <p>Demand and supply could assist in keeping house prices down.</p> <p>Without a large percentage of affordable homes many would never be able to own their own home.</p> <p>I feel that the amount of new homes indicated is far more than is required for a Town like Newmarket.</p> <p>Being a racing town, the amount of new homes proposed would far out-weigh any sustainable growth within the racing industry.</p> <p>The Council should not specify an end date for the plan.</p> <p>If settlements are large they may soon become problem areas.</p> <p>The timings of any new build should be when there is sufficient infrastructure.</p> <p>A large and sudden increase in the population would place great strains on our already dwindling public services.</p> <p>We shouldn't concrete over high grade agricultural</p>	<p>The response from Newmarket Town Council was mixed with conflicting opinion on the development strategy for Forest Heath. For example, in one section of the response it was suggested that the original CS7 housing provision figure should be regarded as a minimum whereas in another section it was considered that such a figure would be far too high and would constitute unsustainable development. Similarly, in one section of the response it was considered that the Council should specify an end date for the plan whereas in a latter section it is suggested that no end date should be specified.</p> <p>General points:</p> <p>In terms of the Chippenham Fen SSSI, this constraint will be further considered within the context of the HRA.</p> <p>In terms of development, the Council will prioritise development of brownfield sites in the first instance. However, the yield from such sites alone may not be sufficient to meet all of our housing requirements as evidenced.</p> <p>In terms of the provision of affordable housing, our overall assessment of need, (as evidenced by the SHMA), will take this into account. In addition, retained policy CS9 of the adopted Core Strategy Local Plan document specifies minimum provision of affordable units within any new development.</p> <p>In terms of a 'population boom', our assessment of housing need, as evidenced by the 'Analytics Cambridge' report, considers the various components of population change and the impact this will have on demand for housing now and in the future.</p> <p>There appears to have been a misunderstanding in terms of the data presented at table 9.</p> <p>(NTC) We need new homes in Newmarket, not only to meet current demand, but also to ensure that we are able to attract new jobs into Newmarket. (FHDC) The District Council will seek to align homes and jobs growth and the Analytics Cambridge Report considers economic trends as well as recent economic forecasts in establishing a 'range' of numbers of new homes that maybe required.</p>	<p>Consider giving greater emphasis to the constraints imposed on Newmarket by the Racing industry, (appropriate mapping?).</p>

<i>Representations</i>	<i>Nature Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
	<p>land. Horses need a lot of space and therefore horses and high density development do not mix. East Anglia has already seen a large growth in population since the 1960s. The evaluation contained in table 9 is misleading and misguided. Table 9 should show that 'new' land is needed for 4,005 homes if we are considering the period 2012-2031, (5,335 minus 1,330). In relation to the constraints maps it should be made clear that in certain locations, if appropriate mitigation or compensation can be secured, the constraints are unlikely to apply. The level of constraint imposed by the presence of the horse racing industry is not sufficiently portrayed in the document. There is no indication that the proximity of Newmarket to Chippenham Fen SSSI has been recognised. In Newmarket we should only build on brownfield sites. There should be more affordable housing to keep young people in the town.</p>	<p>(NTC) It is important that employment provision in the Town is diversified and not reliant on one sector. (FHDC) Policy CS6 of the adopted Core Strategy seeks investment in a range of new employment sectors in addition to protecting and fostering established industries including the Racing Industry.</p> <p>(NTC) It is important to consider existing and empty homes. (FHDC) Vacant Stock is considered within the context of our SHMA and will be used to evidence overall need in the District. However, it should be acknowledged that vacant stock alone will not be sufficient to meet our overall housing requirements.</p> <p>(NTC) New housing must be underpinned by appropriate and adequate infrastructure planning. (FHDC) The IECA study evidenced the original Core Strategy Policy CS7 and deviation in terms of scale and location of development will be similarly evidenced, otherwise the strategy cannot be deemed sound at the examination stage.</p> <p>(NTC) Horse racing in Newmarket is one of the most successful industries and anything that may jeopardise this would be damaging to the economy of Newmarket. (FHDC) Other policies within the Core Strategy and emerging Development Management Policies Local Plan document seek to protect the racing industry which we acknowledge is vital to the economy of the Town and wider area.</p> <p>(NTC) The settlement plans/planning constraints shown do not present an accurate reflection of the nature of the constraints described. For example, the manner in which the plans are presented would suggest that all constraint zones constitute insurmountable barriers to growth. (FHDC) The policy wording within the 'Issues and Options' document does make reference to the requirement for mitigation where appropriate and where the particular constraint(s) identified are not necessarily 'show-stoppers'.</p> <p>(NTC) The level of constraint imposed by the Racing Industry is not adequately reflected in the 'Issues</p>	

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
			and Option' document. (FHDC) This is a fair comment and will be considered in the context of the 'submission' version of the document.	
<i>1.2</i>				
20329	Comment	Suffolk County Council Property Division is responding to the Single Issue Review Consultation on Housing Provision because it has two surplus Middle School sites in Newmarket that could help to meet housing needs in Forest Heath. The St Felix and Scaltback sites could jointly contribute between about 100 and 250 new homes together with open space, employment and community uses. A local consultation has been undertaken in Newmarket about possible future uses for these sites. Other County Council Departments will also respond on wider policy and service provision issues.	Comments noted. The school sites will be taken into consideration when the Site Allocations Local Plan is prepared.	No action required.
<i>1.10</i>				
20249	Comment	The assumptions on which the number of houses required are based are crucial to the debate. What is the future of the American bases? Will immigration continue at the present level or will it decline in line with government policy? The growth of Cambridge as a centre of employment and the need to reduce travel to and from work for environmental reasons must affect the Forest Heath region.	Comments noted. Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. A number of factors will impact upon the demand for housing and several of these are considered within the context of the Analytics Cambridge report. The future of the US military and their requirement for housing in the District is unclear and can be considered at a later date, potentially when reviewing the Local Plan, when their intentions are clearer.	No change to document required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<p><i>1.18</i></p> <p>20386</p>	Comment	This provides a good opportunity to review and revisit the overall district housing requirements. In particular the issue of sustainability should be addressed and care taken over whether housing delivery will be matched by job availability or whether the problems of traffic congestion and environmental damage would be aggravated by increased commuting.	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. The issues around traffic congestion and environmental damage were considered at the time the RSS was drafted. The Analytics Cambridge report suggests a similar scale of development remains appropriate. The supporting documents, including the requisite HRA and SA/SEA, will fully consider the impact of the policy on the environment.	No action required.

Representations**Nature Summary of Main Issue****Council's Assessment****Action****Part 1: The Overall Housing Requirement for the District****1.21**

20382	Object	The overall housing requirement proposed for Forest Heath is too high. If revoking the RSS has removed the spatial distribution of housing numbers but has left overall the housing requirement in place FOR THE TIME BEING, then this would be the opportunity to challenge that. FHDC is overwhelmed with environmental building constraints - flood plains, SPAs etc, not to mention stringent protection requirements for stone curlew, woodlark and nightjar etc, all of which would be at risk both from the building process and an increase subsequently in the number of houses, vehicles, people and domestic pets.	It is accepted that Forest Heath has many areas that are subject to significant constraints but, equally, there remain areas that are either unconstrained or less constrained. It is also the case that any housing numbers identified through this process must be done so on the basis of meeting objectively assessed and identified need, and the impending anticipated revocation of the RSS does not given the Authority the opportunity to unilaterally reduce the housing figures, rather it is an opportunity to revisit the evidence that underpinned those figures to see if they remain valid. The Authority must continue to plan based on the RSS requirement until (if) such time as it is superseded, and to then plan on the basis of an objective assessment of need.	No action required.
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1.22

20348	Object	USAF are encouraging personnel to live on-base (new building on-base to accommodate personnel). What happens to rented properties in village? Could be empty. Local people are unlikely to afford rents charged hitherto. Rents may be reduced to a level that can be afforded by local people (profitable?) or the properties put on the market. With that housing on the market in next 2 / 5 years do we need new-build housing? The village infrastructure (particularly sewers and roads) are under strain with the current load - sewage comes out of drains in properties adjoining High Street. Infrastructure should be upgraded first.	It is important that this strategy takes a longer term approach, and the evidence confirms that the population is rising as a result of immigration and natural increase, and will continue to do so. The strategy looks over a more significant period and any more incidental fluctuations within a shorter time frame should not influence the longer term approach. The IECA study recognises the infrastructure needs of settlements and is a crucial piece of evidence to be used in setting the eventual strategy. We should continue to plan on the basis of objectively assessed housing need, and to rely on the findings of the IECA study.	No action required.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.25</i>				
20408	Comment	This strategy is welcomed, but consideration must also be given to the sustainability of large developments at the edge of a settlement, where the benefits of 'belonging' to the settlement may not be easily accessed and where the existing infrastructure of water supply and drainage, public transport, schools, medical facilities etc may be inadequate. Such a housing development may be primarily used by commuters who would not contribute to the community by using its services and who would have a detrimental effect on it not only by putting extra strain on utilities but also by pollution from additional vehicles.	Comments noted. Matters of 'sustainability' will remain key in assessing the next stage of this process, as will consideration of the implications of the IECA study.	No action required.
20374	Support	The general approach of directing new development to the larger and more established settlements is consistent with all relevant policies and so is supported.	Comments noted	No action required.
<i>1.26</i>				
20349	Comment	The definition of KSC has changed in the past 3 years. It seems to be becoming less meaningful. Job opportunities in and near the village are declining and what commercial premises there are are being developed as housing. We need FHDC to have the vision to re-develop old commercial properties (e.g. Curtis Brothers) as new shop / business units,	The criteria for defining Key Services Centres have not changed, and it remains the case that both Lakenheath and Red Lodge continue to fulfil the requirement for such a designation.	No action required.

Table 5: Comparative context for considering what might be an appropriate level of housing growth for Forest Heath

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Table 5: Comparative context for considering what might be an appropriate level of housing growth for Forest Heath</i>				
20377	Comment	Representations have been made to Forest Heath and Breckland District Councils over the apparent lack of cooperation in developing appropriate development strategies, contrary to NPPF para 54. It is appreciated that there has been some sharing of information but policies and proposals across the administrative boundary have not taken account of the nature of adjoining areas. Development within Breckland north of Brandon relates physically and operationally to the town but is disregarded by Forest Heath and treated as a rural area by Breckland. A comprehensive assessments of housing needs and development opportunities/constraints should have been undertaken.	Comments noted. Under the duty to co-operate liaison with Breckland DC is underway, particularly with regard to development at Brandon and in relation to a possible by-pass for the town.	No action required.
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<i>1.36</i>				
20378	Comment	As per previous comments, assessment should (in accordance with NPPF para 54) have encompassed the adjoining areas of neighbouring authorities.	Assessment in the SHMA does precisely that. Is it acknowledged that plans must be drawn up to meet local need where identified, which is what this scenario proposes, albeit it is further accepted that this issue is part of a wider balance.	No direct action.
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<i>1.47</i>				
20391	Comment	On the provision that an appropriate level (and timing) of developer provision/ contributions to healthcare infrastructure and funding is provided for, to increase the capacity of GP Catchment Surgeries through reconfiguration and modernisation of equipped floor space, extended (equipped) floor space and new build (equipped) premises as necessary, NHS Suffolk (NHSS) raises no objections in principle to the three growth scenarios.	Comments noted.	No action required.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
1.48 20247	Support	While balancing housing and jobs is desirable, a number of basic assumptions must be made. For example, what is the future of the American bases? If these were to be closed or reduced in size, fewer houses would be required, not only for service personnel but also for locally employed civilians. Will immigration continue at the present rate or will the indigenous unemployed take on the jobs currently done by immigrants as a result of being tempted/forced into work by government legislation? Both of these possibilities would reduce the number of houses required.	Comments noted. Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. It is considered that this is a robust assessment of local needs at this time. There is no certainty that housing currently occupied by the American Military will become available and/or in what numbers. Even if all of this housing were to be made available, it would not be sufficient to meet all needs as evidenced.	No action required.
<i>Question 1</i>				
20261	Comment	The NPPF states that plans should set out a clear strategy for allocating sufficient land which is suitable for development taking into account the needs of the residential and business communities. In accordance with the principles of sustainable development, housing should be provided where there is good access to employment opportunities. Similarly, new employment opportunities will only be attractive if adequate housing is provided alongside. Therefore, we consider that housing growth needs to at least match the growth in jobs.	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. It is clear that attempts do need to be made to match homes and jobs. The Core Strategy and Site Allocations document will seek to locate homes and employment land in our more sustainable towns and villages to increase levels of accessibility and provide this balance.	No action required.
20309 20415	Object	Object to the Council's proposed Scenario 1, which aims to reduce the housing targets for the District. Paragraph 47 of the NPPF states that LPAs 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". Scenario 1 would not meet the objectively assessed needs for market and affordable housing. The evidence base identifies a housing need equal to or in excess of that identified by the RSS (and currently adopted by the retained parts of the Core Strategy).	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. It is considered that this constitutes a robust assessment of local needs although this remains to be tested at the submission and examination stages. The various scenarios presented offered a comparison as to what might be an appropriate level of growth.	No change required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20252 20337	Object	Forest Heath is located within close proximity to a major driver in the regional economy Cambridge. Inevitably there will be demand for housing for those commuting to jobs outside the district. It is not therefore sufficient to build homes commensurate only with the level of job growth, however, sustainable it may appear to encourage people to live and work in the same district.	Same representation as 20434. Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. It is agreed that housing is required for those working within the District as well as those that commute to employment opportunities elsewhere.	No change required.
20268 20288 20434	Object	Forest Heath is located within close proximity to a major driver in the regional economy Cambridge. Inevitably there will be demand for housing for those commuting to jobs outside the district. It is not therefore sufficient to build homes commensurate only with the level of job growth, however, sustainable it may appear to encourage people to live and work in the same district.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. It is agreed that housing is required for those working within the District as well as those that commute to employment opportunities elsewhere.	No action required.
20279 20315 20332 20392	Object	Level of growth proposed - 6,665 dwellings. Associated healthcare infrastructure requirements to support proposed growth - additional 8.75 GPs and 1,137.5m ² equipped floor space across the District. Healthcare infrastructure to be secured through developer provision / funding (£2,275,000) to reconfigure existing floor space, expand existing floor space or provide new floor space, as appropriate, (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Healthcare infrastructure will be secured in accordance with Development Management Policies.	No change required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20375	Support	Expectation within National Planning Policy Framework and 'Planning for Growth Statement' that a balance of increased job opportunities together with housing growth must be encouraged. Current legislation states that Local Authorities need to identify and meet housing, business and other development needs. This should therefore be applied to Forest Heath District Council.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. It is considered that our approach to determining what is an 'appropriate' requirement for new homes is based on an objective assessment of local needs and accords with the provisions of the NPPF.	No action required.
20327 20379	Support	Without this balance the principles of sustainable development are difficult to achieve. However, the importance of meeting local needs for both open market and affordable housing must be taken into account. The questions on this issue, perhaps inevitably, are not worded in a form which encourages debate over the balances that need to be considered.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. It is acknowledged that an appropriate balance need to be struck in terms of meeting our affordable and other housing needs given the District is heavily constrained. It is considered that the document as a whole encourages debate about what might be an appropriate level of growth given the constraints and the need to strike an 'appropriate' balance.	No change required.
<i>Risk/Benefit Analysis for Scenario 2</i>				
20383	Comment	The constraints on the Council are recognised, one being the issues that gave rise to the High Court decision leading to this Single Issue Review. The conclusions of the Habitat Regulations Assessment, and the extent of the District affected by this, are noted in particular. This scenario would require greater analysis of these matters but the relevant HRA procedures allow for a greater level of assessment and more comprehensive balancing of competing policy requirements, notably protection of Habitats and meeting housing and other development needs.	Suggestion that significantly greater analysis of HRA related impacts would be necessary if this scenario were adopted is noted and agreed.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 2</i>				
20280	Comment	The provision of housing to meet all needs is very important but sufficient affordable housing provision will only be achieved if cross-subsidised by the market sector. This should be distributed principally among settlements with the best infrastructure to support an increase in population. This includes smaller settlements which are accessible by public transport in order to sustain services and to stimulate local employment markets.	Comments on distribution noted and agreed - this suggested strategy conforms with the extant spatial strategy within Policy CS1 of the Core Strategy in addition to the affordable housing policy, (CS9).	No direct action necessary
20248	Comment	Before deciding how many houses are required for the people who work or live in the area, why not think about why they are here? For example, many people in the area work in other regions, notably Cambridge. In recent years Newmarket has declined in quality as a place to live and especially to shop. In many respects it is a dormitory for other towns. It would be more sensible to build houses where the work is located.	Comments noted - balancing housing growth with proposed employment growth is suggested in scenario 1 as a possible option and this response is seen as support for such, and criticism of the suggested scenario 2.	No action required.
20334	Comment	Other Suffolk County Council Departments will respond on wider policy and service provision issues.	Comments noted	No direct action
20262	Comment	There is a case for a combination of measures which will help to ease the current, and continuing, shortfall in housing provision. Part of the shortfall could be met by an increase in housing allocations. Further easing of the problem could be achieved by provision of low cost market housing which would provide much needed starter homes. While it would be wrong to allocate sufficient housing to meet the entire shortfall in affordable need because of the over provision that would follow, a carefully struck balance could be of benefit to all sectors of the community.	Comments noted in relation to overprovision. It is accepted that this scenario, if progressed, is about balance.	No direct action.
20381	Comment	It was indicated in response to question 1 that the questions are worded unhelpfully. In response to this question it is considered that meeting local needs should be given more weight than appears to have been the case but the range of constraints is recognised.	Comments noted, particularly in relation to the recognition of constraints. The provision of sufficient levels of affordable housing remains a Corporate/policy priority, (see Core Strategy policy CS9 and emerging affordable housing SPD).	No direct action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20393	Comment	<p>Level of growth proposed - 12,711 dwellings.</p> <p>Associated healthcare infrastructure requirement to support proposed growth - additional 16.73 GPs and 2,174.9m2 floorspace across the District.</p> <p>Healthcare infrastructure to be secured through developer provision / funding (£4,439,800) to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate, (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13.</p>	The need for essential infrastructure to support any growth is recognised and accepted within CS13 of the adopted Core Strategy. The principle of developer contributions required on increased growth levels in order to ensure infrastructure suitable for the scale of development is provided.	No action required.
20269	Object	Developers inherently dislike supplying affordable homes and increasing the requirement for them would result in developers going elsewhere. This would create a serious shortfall. Far better that an acceptable proportion is supplied than none at all. It is also important for community balance that a good mix of housing is provided. Further, the Government has recently promoted a relaxation of the Affordable homes quota in order to make stalled development more viable. This is a clear change of policy in order to encourage development.	The percentage of affordable housing sought would not increase under this scenario so it is not considered that it would necessarily lead to developers going elsewhere or to an imbalance in provision of affordable/market dwellings. Comments in relation to the need for community balance noted and accepted, and this is an aim of Corporate housing policy, (see emerging affordable housing SPD).	No action necessary.
20328	Object	This is a nonsensical way of achieving the affordable housing needs. The correct method is to set the percentage of affordable houses which developers have to provide so that the affordable housing needs are met without inflating the total number of houses built.	This suggestion is nonsensical. The level of provision of affordable housing has been viability tested at 30%. It would be wholly unreasonable, unrealistic, and unviable, to seek to meet the level of affordable housing need by simply increasing the percentage required.	No direct action.
20310	Object	I do not believe it beneficial to have concentrations of affordable homes, it may be preferable to build superior quality properties which could be rented at favourable rates.	it is NOT accepted practice to have concentrations of affordable homes, (See emerging Affordable Housing SPD), although, in any event, there would be no increased concentration since the numbers are a relative percentage.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20351	Object	I would like to make sure that we have housing and jobs for the people who live in the area now and who are born and bred here. We should not be an open house for the rest of the country and also europe.	This is a National Government policy issue that is beyond the scope of this particular review. We do know that our population is growing, and is expected firmly to continue to grow, as a result of natural increase and as a result of people moving into the area from other parts of the country or beyond. It is the responsibility of the Planning Authority, through this process, to ensure that sufficient sites are identified to meet the increased demand for homes.	No direct action.
20376	Object	Affordable housing needs to be considered but is not the most important factor. The National Planning Policy Framework identifies that it is important to plan for a wide choice and mix of good quality homes. Promoting a wide choice of homes in sustainable locations will boost the economy.	Comments noted. It is accepted that it is about balancing often competing issues.	No direct action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20253	Object	<p>2) Should we make the amount of affordable housing needed to provide homes for everyone the most important factor when we work out how many new homes to build in the district between now and 2031? - No</p> <p>The requirement for 669 affordable homes per year reflects the stress in which the housing market find itself. It reflects our comments in respect of Q1 to the effect that restricting supply acts to disadvantage local people over immigrants with greater economic capacity.</p> <p>The answer is not to increase the proportion of affordable homes to be delivered from market housing schemes. This has been clearly demonstrated by a number of housing proposals in the region outside the highest value areas where independent assessment of open-book valuations has affirmed that even levels of 30% affordable provision cannot always be secured from developments especially where there are significant land remediation costs, high infrastructure costs and, or, high levels of contribution are sought to providing social and community gain, such as education.</p> <p>Changes to the way affordable homes are funded is also a significant factor in the delivery of such accommodation and a realistic view needs to be taken on how much affordable housing is likely to be provided in the plan period. Nevertheless, the target figure demonstrates a more realistic picture of the level of new homes that are needed for the District merely to 'stand still' and to perform what should be the basic duty of any local authority which is to ensure that its resident population's need for homes can be addressed satisfactorily.</p>	<p>Comments noted - it was never the intention of this scenario to increase the percentage of affordable homes to be sought since it is recognised that over 30% presents viability issues that would hinder future provision rather than help.</p>	No direct action.
20289	Object	<p>If significantly more housing was available than jobs it would result in out-commuting. This option is not in accordance with the adopted core strategy and the levels of affordable housing suggested are not viable.</p>	<p>Comments noted, and accepted. It is conceivable that any significantly increased level of housing provision, in order to facilitate the necessary levels of affordable housing provision would lead to an imbalance between homes and jobs, based on the present retained strategy within CS1.</p>	No direct action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20416	Support	If the Council were to re-assess their housing target, Rockhill Investments Ltd considers that Scenario 2 would be the preferable option, as it meets the requirements of the NPPF, in that it seeks to address the current affordable housing deficit (and, thereby, the market housing deficit as identified, for example, by the SHMA). Rockhill Investments Ltd is aware that there are unconstrained sites in the District which can help deliver Scenario 2, and also considers that West Row is able to accommodate additional dwellings in the short and medium term.	Comments noted. The desire to provide enough affordable housing to meet the identified need is a significant factor but is only one of many factors that must be balanced.	No direct action.
20316	Support	We content that the Council should base their Core Strategy on Scenario 2 and provide homes for everyone. This is backed up by the SHMA study and the requirement for affordable housing in the District.	Comments noted - further careful consideration must still be given to this option however if it is to be taken forward, not least in relation to the HRA related implications given the amount of greenfield land that would be necessary. Given the infrastructure implications that would arise it remains a problematic scenario, particularly given the extant policy requirement for 30% affordable housing, not the 48% as historically delivered.	No direct action.
20338	Support	We should make the amount of affordable housing needed to provide homes for everyone the most important factor when we work out how many new homes to build in the district between now and 2031. For most people buying their own home is not affordable because of the large deposits required.	Comments noted. Issues of deposits required are outside the scope of this consultation.	No direct action.
<i>Question 3</i>				
20270	Comment	The building momentum is influenced by land availability, financial considerations and infrastructure availability. Whilst having a consistent annual target within the plan period might provide a useful monitoring tool, it should not be used to dictate build rate. If developers are able to provide a higher number of dwellings at any time, it should be encouraged as outside influences might severely restrict building in another year and the overall target could be missed.	Comments noted. As suggested, the annualised target is a useful monitoring tool. It is accepted that actual delivery rates will vary year on year and the Council will not actively set a threshold for delivery, (provided the necessary infrastructure is in place to support development).	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20380	Comment	The rate that new homes in the district are built should be higher than at present. FHDC does not have a five-year supply of housing against housing requirements as required by the NPPF and therefore the housing figures supplied by the Council are out of date. Should FHDC identify the five-year supply of housing it would be apparent that additional homes are required.	The housing requirement that is established via the Single Review Process will be based on an objective assessment of local needs in accordance with the requirement(s) of the NPPF.	No action required.
20263	Comment	A failure to build more homes will lead to additional pressure on house prices, which would further disadvantage those on medium to lower incomes. There is a strong argument for an increase in numbers above the existing trends and for increasing the figure of 10,100 dwellings (up to 2031), currently included in the adopted Core Strategy. A minimum figure of around 11,000 dwellings up to 2031 may be required if the adopted Core Strategy Spatial Objectives H1 & H2 are to be met.	Response noted. The figure of 10,100 dwellings as identified within the Core Strategy Development Plan was evidence based and likewise, any number identified within the context of the Single Issue Review process must be appropriately evidenced.	Comment noted. No change to document required.
20281	Comment	Comments on the need for the rate of home building to be significantly higher than at present to ensure that sufficient housing is provided across the District.	Comments noted. The overall housing requirement will be appropriately evidenced.	No action required.
20311	Comment	Its difficult to predict ahead, rather than setting meaningless targets on the horizon why not simply build to satisfy local demand.	Comment noted. Annual targets are useful for monitoring purposes. The overall level of provision over the entire plan period should reflect local needs as evidenced.	No action required.
20394	Comment	Level of growth proposed - 7,220 dwellings. Associated healthcare infrastructure requirements to support proposed growth - additional 9.52 GPs and 1,237.6m2 floorspace. Healthcare infrastructure to be secured through developer provision / funding (£2,475,200) to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate, (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13.	Comment noted. Infrastructure requirements to support growth will be considered as we progress work on our Local Plan documents including the Single Issue Review that will define the broad distribution, phasing and quantum of development and the Site Allocations Local Plan document that will look at specific sites and their infrastructure requirements.	No action required at this stage.
20335	Comment	Other Suffolk County Council Departments will respond on wider policy and service provision issues.	Comment noted.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20352	Object	I think that the calculations are wrong and due to the recession there is less need for housing and we should be building more slowly.	Comment noted. The existing build rate figures are derived from the Council's Annual Monitoring Reports. In a period of recession, housing delivery rates may fall but this does not necessarily mean that there is less of a requirement for new dwellings.	No actions required.
20417	Object	Object to proposed Scenario 3, which aims to reduce the housing targets for the District. Paragraph 47 of the NPPF states that LPAs 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". Scenario 3 would not meet the objectively assessed needs for market and affordable housing. The evidence base identifies a housing need equal to or in excess of that identified by the RSS (and currently adopted by the retained parts of the Core Strategy).	Option 3 provides a scenario for growth that can be used as a benchmark. It is not intended to provide the definitive figure or the full, objectively assessed needs for market and affordable housing in the market, (District), area. This will be further considered as we progress with the Single Issue Review process and in light of all the evidence available to us.	No action required at this stage.
20254	Object	The derivation of the housing target should be based on more than just what has been achieved in the past. Not to do so would be to fail to evidence demand and render a plan unsound. Past trends may be considered the starting point from which a future level of growth based on a proper understanding of housing markets, demand, economic growth and the need to deliver housing for local people should be derived. We would suggest that an annualised figure of at least 600 dwellings (including commitments) would reflect a realistic strategy based upon the need to meet market demand whilst addressing the needs for new homes by the local population. There is no national or local evidence that would suggest that a figure lower than recent delivery trend rates would be justifiable or supportable in any respect.	Comments noted. The Issues & Options document presented a number of scenarios for consideration. These will be refined in due course and the level of growth ultimately determined will be appropriately evidenced and based on a number of factors, not solely previous rates of housing delivery, (although this is a useful benchmark). It is anticipated that the annual requirement for new homes is not likely to be lower than the previous rate of housing delivery as presented in the consultation document.	No action required.
20290	Object	The figures which underpin this scenario are skewed by the significant numbers of completions in Red Lodge which will not continue.	It is accepted that recent build rates may well not continue in the future as existing commitments/permissions are 'built-out' in Red Lodge and indeed other settlements. This is a very important consideration, although other factors will also have an impact on 'traditional' delivery rates such as change to the current economic situation and/or additional planning permissions being granted.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20369	Object	It is necessary to ensure that the full, objectively assessed market and affordable housing needs are met. Persimmon object to the Council's proposed scenario's 1 (Balancing housing and economic growth) and 3 (Continuation of existing trends), both of which aim to reduce housing targets for the District. The evidence base as outlined at Table 7 of the Core Strategy Single Issue Review consultation document identifies a housing need in excess of that identified by the RSS and Core Strategy. As such scenario 2 would appear more appropriate in seeking to meet the need test of the Framework, and more likely to be 'sound'	Comment noted. It is intended that the Single Issue Review will ensure that the full, objectively assessed market and affordable housing needs are met in accordance with the requirements of the NPPF. It may be that once assessed, the requirement is higher than that identified within the original Core Strategy Policy CS7/RSS.	No action required.
20330	Object	The rate of houses to be built should be less than the average for 2006 to 2012 because that average includes the large number of houses built at the development in Red Lodge. Without Red Lodge the rate of delivery is approximately halved (190 per annum).	It is accepted that recent build rates may well not continue in the future as existing commitments/permissions are 'built-out' in Red Lodge and indeed other settlements. This is a very important consideration, although other factors will have also have an impact on 'traditional' delivery rates such as change to the current economic situation and/or additional planning permissions being granted.	No action required.
20317	Object	As stated in our response to Question 2, we believe that the current housing rate of building is insufficient to meet the demand, as demonstrated in the SHMA 2010 study. Furthermore, the current low rate of building is due to the present challenging economic circumstances and should not be used as a guide to the future.	Comment noted. The SHMA is one evidence base that will help us to determine the level of our overall housing need in the plan period. It is accepted that the current build rate, although useful as a benchmark figure, is also subject to change and will be partly influenced by the current 'challenging' economic conditions. Our future need will be evidenced and justified and will be dependent upon a number of factors including affordable housing needs and forecast economic conditions.	No action required.
20340	Support	The rate at which we build new homes must be higher than the current rate, which is far too low to meet demand. The evidence for this is the increasing number of homeless people.	Comment noted. The overall housing requirement figure that is ultimately established will be appropriately evidenced and reflective of a thorough assessment local needs including acute housing need.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 4</i>				
20423	Comment	It has not been demonstrated that building this number of houses is deliverable without using a substantial proportion of Greenfield sites. In this district, many environmental constraints restrict potential Greenfield sites which once developed are lost for ever. In addition, it would be difficult to build this number of houses without drastically altering the character of the surrounding countryside. FHDC should not stick to the plans to build this number of houses.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. With regard to environmental constraints, ongoing discussions with Natural England will direct development to the most sustainable locations with least harm to the environment. Any environment constraints will need to be mitigated in accordance with Core Strategy Policy CS2 and other relevant development management policies.	No action required.
20425	Comment	It is imperative that any variation in the number of homes, from that previously explored through the CS process, is appropriately assessed. This is to ensure any revised proposals do not result in the contravention of the EU Water Framework Directive.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Any revision to the established housing numbers will be appropriately evidenced and underpinned by both HRA and SA/SEA to identify and mitigate impact on the environment.	No action required.
20265	Comment	The original plan to build 7011 dwellings, at the rate of 369 a year will be too low to meet Spatial Objectives H1 & H2. As suggested a figure of around 11,000 dwellings is required which gives a build rate of 579 a year over the period to 2031. While this is considerably higher than at present, it is likely that the actual completion rate will in the event prove to be significantly lower than projected over the first part of the plan period to 2021, due to the current depressed state of the housing market.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide households in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. It is accepted that build rates will fluctuate throughout the plan period whatever house building target is established in accordance with prevailing economic conditions and other factors.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20264	Comment	The original plan to build 7011 dwellings, at the rate of 369 a year will be too low to meet Spatial Objectives H1 & H2. As suggested a figure of around 11,000 dwellings is required which gives a build rate of 579 a year over the period to 2031. While this is considerably higher than at present, it is likely that the actual completion rate will in the event prove to be significantly lower than projected over the first part of the plan period to 2021, due to the current depressed state of the housing market.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide households in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.	No action required.
20395	Comment	Level of growth proposed - 7,011 dwellings. Associated healthcare infrastructure requirements to support proposed growth - additional 9.23 GPs and 1,199.9m2 floorspace. Healthcare infrastructure to be secured through developer provision / funding (£2,399,800) to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate, (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13.	See previous comments to same representation under Brandon, Mildenhall and Newmarket.	No action required.
20312	Comment	Build to satisfy local demand, if demand is high consideration should be given to new settlements with all the infrastructure designed in from the outset.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. The Single Issue Review is considering the quantum, phasing and distribution of growth. It is beyond the scope of the review to consider provision of new settlements as Core Strategy Policy CS1, (including the established settlement hierarchy), has been retained.	No action required.
20282	Comment	Comments on the need to increase the target number of homes in the District over the plan period.	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20368	Comment	FHDC is a highly constrained district subject to many policy limitations. There are few areas with good vehicular access close to existing services and facilities. There is, however, an unconstrained portion of the A11 corridor within FHDC between Red Lodge and Mildenhall Five-Ways Roundabout which FHDC may consider as a 'strategic development option' as part of its deliberations on how to provide the much needed new homes to serve FHDC to 2031. Given the deficit of housing, the site would help to meet this level of need.	The adopted Core Strategy Policy CS1 establishes the settlement hierarchy for the district focussing on the 3 market towns and 2 key service centres. The proposed strategic development option (effectively a new settlement) does not accord with the above policy. Sufficient provision for housing and employment can be made in the existing settlements to meet Policy CS1 requirements.	No action required.
20419	Comment	Rockhill Investments Ltd objects to the Council's proposed Scenarios 1 and 3, which aim to reduce the housing targets for the District. If the Council were to re-assess their housing target, Rockhill Investments Ltd considers that Scenario 2 would be the preferable option, as it meets the requirements of the NPPF, in that it seeks to address the current affordable housing deficit (and, thereby, the market housing deficit as identified, for example, by the SHMA).	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Scenario 2 may enable the District to meet all of its affordable housing requirements but this may be at some cost, (i.e. negative impact on the environment). The Single Issue review will need to strike an appropriate balance.	No action required.
20336	Comment	Other Suffolk County Council Departments will respond on wider policy and service provision issues.	Noted	No action required.
20255	Object	Forest Heath is located within proximity to a major driver in the national and regional economy Cambridge. Inevitably there will be demand for housing for those commuting to jobs outside the district. It is not therefore sufficient to build homes commensurate only with the level of job growth, however sustainable it may appear to encourage people to live and work in the same district.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Our housing requirement should be assessed on the basis of a robust assessment of local needs and will partly be reliant on data from the SHMA which is a detailed and joint study encompassing those areas within the Cambridge sub-region. The influence of Cambridge as a 'driver' will therefore be considered.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20333	Object	It would be better to aim for the lower number of houses of Senario 1 or an even lower figure of Senario 3 with the rate of build corrected to 190 per annum to allow for the recent average being inflated by the large development at Red Lodge.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. The scenario put forward by the respondent is unlikely to meet our objectively assessed needs and would therefore not comply with the provisions of the NPPF.	No action required.
20385	Object	As indicated by the lack of a five-year land supply, more homes are needed in the district. The current economic market also means it is important to aim higher than present day figures may require to ensure there is not a shortage of housing once the economy picks up. Judging the number of homes required can be done through a detailed assessment of previous housing delivery rate.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. With regard to lack of 5 year supply, the Authority are proposing to bring forward its Site Specific Allocations Local Plan to address this 'shortage'.	No action required.
20318	Object	The original plans did not take into account to a sufficient degree the needs of the local populace, as can be demonstrated from the more recent evidence of the SHMA 2010 update which shows that the District has a requirement for 608 homes per annum.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. The SHMA will be used to evidence the ultimate housing target derived but it is clear that a balance must be struck between housing provision and the impact on the natural environment. We need to provide an appropriate mix of homes bearing in mind that affordable housing provision must remain viable. It was viability that informed the affordable housing targets as specified within extant Core Startegy Policy CS9.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20384	Object	The evidence demonstrates that this approach fails to address the failure to meet local needs. The evidence indicates the level of needs to be addressed. The extent to which this is achievable will need to be determined by more detailed assessment of environmental capacity, noting the Habitat Regulations, and also through closer assessment of opportunities with neighbouring authorities. The level set here could therefore be justified as a range between 7,000 and 12,000. It is appreciated that the plan making system should provide certainty but the evidence is not available to allow the balance between the key interests.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Discussions are on going with Natural England to address environmental considerations in a number of locations, in particular Brandon and Red Lodge. Any proposed development scenario must have regard to extant Core Strategy Policy CS2, (Natural Environment).	No action required.
20271	Object	a) No. There are many environmental constraints that operate in Forest Heath. Top down requirements have had no consideration for these. We now have the opportunity of ensuring that constraints are respected and a more appropriate level of housing is allocated b) To align housing with jobs is the most sustainable and achievable option.	See comments in relation to Analytics Cambridge above at 20264	No action required.
20353	Object	It would be good for everyone to know who these houses are for. The need for houses has been totally over estimated. Where are the jobs for these people?	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. This would suggest that we have not over-estimated the need for new dwellings. The intention, as was the case with the RSS housing/jobs requirements, is to provide balance and the Site Allocations document will seek to provide housing and employment land in our more sustainable settlements to achieve this.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20341	Support	The original plans to build a total in excess of 7000 homes should be the minimum.	Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. The final target will be treated as a minimum as was the case with the 'original' policy CS7 but there must be justification in exceeding the figure and any additional development would need to be sustainable.	No action required.
20291	Support	The overall housing numbers contained within the core strategy were tested at the examination in public and were found to be sound by the inspector. These figures were not set aside by the High Court challenge. The figures are the closest to the balanced approach and represent a sustainable level of development which has been examined and tested.	Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.	No action required.

Representations**Nature Summary of Main Issue****Council's Assessment****Action****Part 2: The Distribution and Phasing of Housing Delivery****Question 5**

20292 20396	<p>Comment Growth in Brandon would require additional GP infrastructure to be secured through developer provision/ funding to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13.</p> <p>The evidence base of Core Strategy Table 4.1 should be updated to reflect the above.</p>	Comments noted. Contributions from development proposals in accordance with Development Management Policies can be secured to improve health facilities.	No action required.
20387	<p>Comment The level of provision that can be made at Brandon, which as one of the major settlements should be a focus for sustainable growth, highlights the difficulty of the necessary balancing of important public interests. The constraints are clear as would be the merits of increased growth but the issues can only be resolved through more detailed assessment of impacts and mitigation in the context of the Habitats Regulations and considering opportunities for areas which function as part of Brandon but lie beyond the administrative boundary.</p>	Comments noted. Discussions with both Natural England and Breckland District Council with help resolve these issues.	No action required.
20319	<p>Object Brandon was allocated too many homes within the original policy. We contend that given the lack of available funding in today's weakened economic climate that the bypass will be undeliverable and furthermore when considering the original 'no bypass' allocation of 760 homes, that number would place too great an environmental burden on the surroundings given the significant habitat constraints. Given these factors, it would be better to decrease Brandon's allocation and redistribute the balance of homes to the remaining Market Towns and more deserving Key Service Centres such as Lakenheath.</p>	<p>Analytics Cambridge have refreshed the evidence base, (October 2012), with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.</p> <p>In accordance with Core Strategy Policy CS1, Brandon is identified as a market town which is capable of accommodating a reasonable level of development subject to appropriate infrastructure provision, (including a bypass were the higher levels of growth to be realised as envisaged by the 'original' Core Strategy Policy CS7). Natural England will need to be satisfied in relation to environmental, (SPA), constraints prior to any development taking place.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20373	Object	<p>The allocation of houses on Greenfield sites is too high. Brandon is surrounded by environmental constraints, SSSIs, SPAs, buffer zones for stone curlew, woodlark and nightjar as well as areas of archaeological interest and conservation areas. This would make the siting of even 500 homes (let alone 1,000 if there is a relief road) very difficult even were effective mitigation possible - which is unlikely and has not been demonstrated.</p> <p>An additional constraint not mentioned on page 26 is the currently inadequate provision for sewage processing - there is frequent flooding when the water table rises.</p>	<p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range.</p> <p>Brandon is identified in Core Strategy Policy CS1 as one of 3 towns suitable for sustainable growth. On going discussions with Natural England will address environmental concerns and secure appropriate mitigation measures as required.</p> <p>Similarly, discussions with Anglia Water/Environment Agency should ensure that any proposed development is phased in accordance with sewerage treatment capacity.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20272 20370	Object	<p>The Infrastructure and Environmental Capacity Appraisal (IECA, 2009) identified a capacity range for each of the settlements within the District, identifying the maximum capacity figures based on physical constraints, consideration of the settlement structure and relationships with existing infrastructure.</p> <p>The IECA (para. 5.10) recognises that Brandon has the infrastructure in place to support reasonable levels of development. Furthermore the IECA (Appendix 8: Settlement Overviews) acknowledges that possible development on the south eastern fringe of Brandon has been identified by the Council for inclusion within the growth opportunity of Brandon due to a lack of available Brownfield land in the existing settlement (para. 6.39). Whilst it is acknowledged that parts of Brandon are subject to Special Protection Area (SPA) designations, other 'higher order' settlements within the District are also subject to SPA status.</p> <p>It is relevant to recognise that the District Council have identified that through stakeholder consultation with Natural England, potential may exist for release of SPA land if replacement habitats can be created elsewhere in the SPA. As such the SPA designation (in itself) does not preclude development.</p> <p>Given the infrastructure context, the fact that Brandon is one of the highest order settlements (along with Newmarket and Mildenhall) within the District, the requirement of the NPPF to meet the full, objectively assessed housing needs (see response to question 3), and that the SPA designation need not (in itself) preclude development, Persimmon consider that there will be a requirement for Brandon to provide in excess of 760 homes (500 green field) or 1,260 homes (1,000 greenfield with provision of a relief road) by 2031.</p>	<p>Comments noted. Discussions with Natural England will need to be held to overcome environmental constraints.</p> <p>Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Brandon will need to take its share as a market town in accordance with Core Strategy Policy CS1</p>	No action required.
20426	Object	<p>Insufficient evidence has been provided to date that the proposed greenfield allocation of 500 homes would be deliverable, given the known environmental constraints at Brandon. We recommend that alternative sites are considered for this allocation.</p>	<p>Comments noted. Discussions with Natural England are ongoing in relation to environmental constraints which will need to be overcome before development can proceed</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20354	Support	Brandon want and need these houses if they are going to get their by pass.	Comments noted	No action required.
<i>Question 6</i>				
20397	Comment	A phasing plan for development in this area should be agreed by FHDC and NHS as part of the plan making process, to ensure that healthcare infrastructure is delivered in a timely manner to support planned growth.	Comments noted. This can be taken into consideration at a later stage when the scale and location of development is finalised through the masterplan /development brief process.	No action required.
20273	Comment	a) no b)As previously stated, building momentum will find its own level according to land, infrastructure and finance availability. Annual targets should be derived by taking into consideration any known prerequisites rather than just allocating the same proportion every year.	Comments noted.	No action required.
20293	Comment	The timing of the delivery of new homes in Brandon should stay the same.	Comments noted	No action required.
20320	Object	We contend there should be fewer homes in Brandon due to the natural and geographic constraints so the numbers in each of the phasing targets should be reduced accordingly.	Comments noted. Discussions with Natural England will determine if the environmental constraints can be overcome. Brandon is identified in Core Strategy Policy CS1 as one of 3 market towns suitable for sustainable growth to meet the districts housing requirement.	No action required.
<i>Question 7</i>				
20398	Comment	Healthcare Infrastructure Constraints - the GP practice in Mildenhall has patient list size and floorspace capacity deficits, which would be exacerbated by additional housing growth. Healthcare infrastructure requirements - 1.74 additional GP and 226.2m2 floorspace to be secured through developer provision / funding of £452,400 to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13. The evidence base of Core Strategy Table 4.1 should be updated to reflect the above.	Comments noted. Development contributions will be sort in accordance with Development Management Policies to provide health facilities.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20294 20321	Object	We contend that there should be fewer homes for Mildenhall. Mildenhall is heavily constrained to the South by Flood risk, the North by aircraft noise and the East by Habitat protection buffers. This leaves the West as the only unconstrained area for development, and imposing all 1320 new dwellings in this location would be too great an imposition on the greenfield sites and loss of agricultural Grade 2 and 3 quality land.	The Core Strategy Policy CS1 identifies Mildenhall as one of 3 market towns capable of providing for housing growth. Consideration of the most appropriate locations for development will be determined as part of the Site Specific Allocation process at a later stage taking into account the above comments.	No action required.

Question 8

20399	Comment	A phasing plan for development in this area should be agreed by FHDC and NHS as part of the plan making process, to ensure that healthcare infrastructure is delivered in a timely manner to support planned growth.	Comments noted. This can be taken into consideration at a later stage when the scale and location of development is finalised through the masterplan /development brief process.	No action required.
20295 20322	Object	We contend there should be fewer homes in Mildenhall due to the natural and geographic constraints so the numbers in each of the phasing targets should be reduced accordingly.	Comments noted. Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Mildenhall is identified in Core Strategy Policy CS1 as one of the towns most suitable for sustainable growth. The natural environment would be afforded protection in accordance with other policies contained within the Development Plan including Core Strategy Policy CS2. The Single Issue Review document will also be supported by a requisite SA/SEA and HRA.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>2.10</i>				
20250	Comment	Newmarket may well be the region's largest town but reference to it as a market town is derisory, given the attitude displayed towards the market over recent years by Forest Heath District Council. The market has declined almost into non existence as a result of uncertainty over its future following the approval to build on part of the market square. Moving it to the High Street, as has been mooted, would kill the most important part, namely the fresh fruit and vegetable and food stalls, given the traffic pollution prevalent there.	Comments noted. The future of the market place can be taken into consideration as part of the Newmarket Visioning Exercise facilitated by the Princes Trust. Proposals for the Market square are beyond the scope of the Single Issue Review exercise.	No change required.
<i>Question 9</i>				
20296 20339	Comment	The additional land at the surplus St Felix and Scaltback Middle School sites could contribute between about 100 and 250 new homes when the sites are made available by Suffolk County Council after the recent closure of the schools. A "plan, monitor and manage" approach to housing provision could be adopted in the Newmarket area and across Forest Heath District to enable fluctuations in demand and supply to be balanced with changes in land availability and commuting and to maximise opportunities to increase provision for affordable housing as they arise.	Comments noted. An Annual Monitoring Report is prepared each year which will pick up fluctuations in delivery rates referred to and may trigger a Local Plan Review if this is deemed to be necessary. The former schools sites can be considered for housing or other uses within the context of the SHLAA/Site Allocation processes.	No action required.
20400	Comment	Growth in Newmarket would require additional GP infrastructure to be secured through developer provision/ funding to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13. The evidence base of Core Strategy Table 4.1 should be updated to reflect the above.	Comments noted. This can be taken into consideration at a later stage when the scale and location of development is finalised through the masterplan /development brief process.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20355	Object	The infrastructure in Newmarket could not take large developments. The roads are already grid locked at certain times of the day. There is not enough water due to the fact we have to rely on aquifers. We need to protect wildlife and natural areas. We should not be building on greenfield sites. Build on any brown field sites and leave it at that.	Comments noted. The Infrastructure and Environmental Capacity Appraisal 2009 has looked at these issues and concluded there is sufficient capacity subject to specific improvements. Consultation with the relevant infrastructure providers as development proposals are considered will identify necessary improvements and scope for financial contributions. The priority remains to build on brownfield land although such sites are limited, particularly in Newmarket and therefore cannot be expected to meet all of our needs.	No action required.
20307	Object	a) no b)yes c)no Newmarket is by far the most sustainable location for development and with the Inspector finding that Hatchfield Farm is an appropriate location in every respect except timing (prematurity), it seems absurd not to take advantage of this presumption for development. Alternative sites risk refusal for any number of reasons which could leave the council with a serious shortfall. Therefore Hatchfield Farm should be allocated for development. This would address a substantial need for housing and take the pressure off less sustainable sites.	Comments noted. This will be taken into consideration at the Submission and Site Specific Allocations stages. Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Newmarket is identified in Core Strategy Policy CS1 as one of the towns suitable for sustainable growth.	No action required.
20274 20342	Support	For Newmarket, the number of new homes to be built by 2031 should be approximately 1620	Comments noted. Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Newmarket received 1,640 dwellings under the 'original' Policy CS7. Although Newmarket is the District's principal town, it must be recognised that it is highly constrained.	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 10</i>				
20401	Comment	A phasing plan for development in this area should be agreed by FHDC and NHSS as part of the plan making process, to ensure that healthcare infrastructure is delivered in a timely manner to support planned growth.	Comments noted. This can be considered at a later stage, namely within the context of masterplanning/development briefs as development proposals proceed with the aim of securing financial contributions for health facility improvements. Contributions will also be considered within the context of the Community Infrastructure Levy, (CIL), mechanism if the authority adopts a charging schedule.	No action required.
20344	Comment	The Hatchfield Farm Inspector's Report said that "Newmarket is the District's 'largest and most sustainable' market town". The "Homes for Your Future" report notes that Newmarket was allocated 25.5% of the District's housing needs in the "old" Core Strategy and suggests the same basis for the future. The surplus St Felix and Scaltback Middle School sites could contribute to housing land availability as part of a "plan, monitor and manage" approach to help meet housing needs in Newmarket in a period of continuing housing market and economic uncertainty.	The two Middle School sites are preferred sites in the context of the SHLAA Review document for 2012 and will be considered for development at the next stage of the Site Allocations Local Plan process.	No action required.
20297 20356	Object	The town could not cope with 1180 houses being built in the next four years. This would kill off a thriving industry which due to the nature of the throughbred horse does not need to be battling with cars and more people. It is getting more dangerous for riders and if you want to kill off this industry and the tourist industry go ahead with your building. Who will employ all these people. 25.5% of all future building in the area should be in Newmarket is ludicrous when it would have such a devastating effect on so many.	The proposed scale of development is over the period to 2031 not 4 years as stated above. Analytics Cambridge have refreshed the evidence base October 2012 with regard to employment, population and household projections. They conclude a requirement to provide housing in the range of 340-410 per year for the district. The current RSS housing requirement falls in the middle of this range. Newmarket, being the district's principal town, will need to take its appropriate share of housing development in accordance with retained Core Strategy Policy CS1.	No action required.
20277 20343	Support	It is reasonable to build at a rate of 80 new homes per year for 20 years	This is achievable taking into account a range of sites from small and medium size urban sites to urban extensions, particularly if built by more than one developer.	No action required.

Table 13: Lakenheath Policy CS7 former allocations and phasing

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Table 13: Lakenheath Policy CS7 former allocations and phasing</i>				
20360	Object	Nothing should take place until a full integrated infrastructure study is carried out with proper sustainable development criteria that reflects a true account of the environmental impact of development on this scale. Certainly not a "planners interpretation" of sustainable development used to justify the development of 660 houses. This needs to be read in conjunction with my response to the questions / statements made in the following parts of the consultation.	The 'proposed submission' version of the Single Issue Review and indeed the Site Allocations Local Plan document will be informed by both SA/SEA, (in accordance with the P&CPA, 2005 and European Directive 2001/42/EC as transposed into UK law in July 2004). The Local Plan documents will be further supported by a HRA that fulfils the requirements of the Conservation of Habitats and Species Regulations 2010 (which replaced the Conservation (Natural Habitats &c) Regulations 1994 and 2007 amendments).	No further action required at this stage.
<hr/>				
<i>2.11</i>				
20365	Object	I cannot agree with the statement "Lakenheath is a Key Service Centre and consequently a more sustainable location for new development" Where is the evidence for this taking account of the previous statements made on infrastructure? This process doesn't seem joined up. A much more comprehensive account and documented evidence must be published on how and why 660 houses are needed with all the infrastructure issues laid out in a coherent and structured manner.	Policy CS7, (adopted in May 2010), and now the subject of this review was supported by a thorough assessment of infrastructure requirements. Crucially, this was an evidence base that was deemed sound, as it related to Lakenheath, at the examination stage. Equally, any uplift, (or indeed reduction), in overall housing numbers directed to the settlement of Lakenheath will need to be evidenced and justified and supported by the appropriate infrastructure appraisal or it will not be deemed sound at the examination stage. At the time the Core Strategy, (adopted May 2010), was examined, it was considered that the services/amenities available in the settlement of Lakenheath were commensurate with its position in the settlement hierarchy, i.e. a 'Key Service Centre'.	No change required to plan.
<hr/>				
20366	Object	Besides the sewerage and water infrastructure highlighted, there needs to be a full assessment and study of ALL the infrastructure needed to support any expansion of the village of Lakenheath. eg.doctors surgery, Primary school. Can they support any expansion in the population? Impact on the road infrastructure? 660 houses = the potential for at least 900 extra cars and all the extra goods and service vehicles associated with services both public and private to an increased population. What about electrical infrastructure? Is there provision for the extra load of at least 10 megawatts in the local grid?	Policy CS7, (adopted in May 2010), and now the subject of this review was supported by a thorough assessment of infrastructure requirements. Crucially, this was an evidence base that was deemed sound, as it related to Lakenheath, at the examination stage. Equally, any uplift, (or indeed reduction), in overall housing numbers directed to the settlement of Lakenheath will need to be evidenced and justified and supported by the appropriate infrastructure appraisal or it will not be deemed sound at the examination stage.	No action at this stage.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Lakenheath Constraints Map</i>				
20362	Object	There should be no extension to the village boundary. Any housing in modest numbers, 60 as stated, should be confined to brownfield sites. Prioritise the already blighted sites at Lakenheath Hall and Mathews nursery. If more housing is required in the village it is only low-cost housing to enable young people/families to remain in the village. All previous experience shows that this is not what will be provided. Planners will have very limited control over what developers build and as a consequence we will end up with more higher-end properties that do not meet local need.	Core Strategy Policy CS9, (in addition to the Affordable Housing SPD), will ensure that a significant element of new housing delivered is affordable and of an appropriate mix/tenure to meet local needs. The preference remains to develop brown-field sites in the first instance, albeit there is an acceptance that such sites alone are not sufficient to meet our overall requirements for Lakenheath, or indeed the District, as they emerge via the Single Issue Review process.	No actions required at this stage.
<i>Question 11</i>				
20251	Comment	Lakenheath Parish Council would be prepared to see total of 800 new homes subject to improvements in infrastructure taking place BEFORE major development. There must be increase in capacity to deal with foul water and improvements for dealing with excess rainwater/flooding. This should happen sooner rather than later as infill, not greenfield, development is already exacerbating these problems. The Parish Council wants to see an increase in off street car parking allocation with any new building - bus services are poor and, more importantly no service is commercially viable; therefore, any further spending cuts could lead to complete withdrawal of buses.	The allocation of 670 homes in the plan period to 2031 as identified within the original Core Strategy policy CS7 was evidence based and underpinned by a robust assessment of existing and required infrastructure to support the envisaged growth of this settlement. Similarly, any revision to the overall allocation will need to be appropriately evidence based to ensure that the fundamental and required infrastructure can be delivered in a timely manner to facilitate settlement expansion. There remains an embargo on new green-field development until post 2015 to allow upgrade to the waste water treatment capacity or until such a time as sufficient capacity is provided. Our policies as they relate to car parking are being further considered as part of the Development Management Policies Local Plan process.	No further actions required at this stage.
20359	Object	There should be no extension to the village boundary. Any housing in modest numbers - 60 as stated, should be confined to brownfield sites. Prioritise the already blighted sites at Lakenheath Hall and former Mathews nursery.	The preference remains to develop brownfield sites ahead of greenfield sites although it needs to be recognised that such sites will probably not be sufficient to provide for all of our objectively assessed housing requirements. The Single Issue Review will look at the phasing, distribution and quantum of housing delivery whereas the Site Allocations Local Plan process will consider any potential revisions to the settlement boundary of Lakenheath in due course.	No actions required at this stage.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20364	Object	No account seems to have been taken of the future of the large amount of housing that exists as part of the USAF base housing that is now "off-base" in Eriswell. There is a policy of filling these houses before USAF personnel can opt for rental properties in the village. This has and will continue to have a significant impact on demand for housing within the village, (thus reducing demand and calling into question the need for any significant housing development). A full study should be undertaken on any impact of housing growth in Lakenheath.	It is accepted that housing provision for Military personnel should be considered as part of the Single Issue Review process. The fact remains that there will still be a District-wide requirement for new dwelling provision and Lakenheath, as a Key Service Centre, is one of the more sustainable locations in which to provide it.	No Actions required at this stage.
20323 20402	Object	Growth in Lakenheath would require additional GP infrastructure to be secured through developer provision/ funding to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13. The evidence base of Core Strategy Table 4.1 should be updated to reflect the above.	Any revision to the overall allocation for Lakenheath will need to be appropriately evidenced to ensure that the fundamental and required infrastructure, including GP provision, can be delivered in a timely manner to facilitate the settlement's expansion. GP provision has been considered as part of the Infrastructure & Environmental Capacity Appraisal, (IECA), that underpinned the Core Strategy as adopted, (May 2010).	No further actions required at this stage.
20358	Object	Can the village cope with this scale of development proposed - 660 houses = the potential for a least 900 extra cars and service vehicles associated with providing services. A full study needs to be undertaken on any impact of USAF base housing that is now "off-base" in Eriswell, on the proposed expansion of housing development in Lakenheath. A more comprehensive account must be published on why 660 houses and infrastructure are needed.	Any revision to the overall housing allocation will be appropriately evidenced to ensure that the fundamental and required infrastructure can be delivered in a timely manner to facilitate the settlement's expansion.	No further actions required at this stage.
<i>Question 12</i>				
20403	Comment	A phasing plan for development in this area should be agreed by FHDC and NHSS as part of the plan making process, to ensure that healthcare infrastructure is delivered in a timely manner to support planned growth.	The allocation of 670 homes in the plan period to 2031 as identified within the original Core Strategy policy CS7 was evidence based and underpinned by a robust assessment of existing and required infrastructure to support the envisaged growth of this settlement. Similarly, any revision to the overall allocation will need to be appropriately evidence based to ensure that the fundamental and required infrastructure can be delivered in a timely manner to facilitate settlement expansion.	No further action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20300	Object	The timing of any further development should be delayed until the existing infrastructure has been upgraded to meet the additional demands placed upon it, and the final requirement for housing has been obtained from the USAF in Lakenheath, as there are now moves to rehouse personnel on the Base.	The allocation and phasing of delivery of the 670 dwellings in the plan period to 2031, as identified within the original Core Strategy policy CS7, was evidence based and underpinned by a robust assessment of existing and required infrastructure to support the envisaged growth of this settlement. Similarly, any revision to the overall allocation will need to be appropriately evidenced to ensure that the fundamental and required infrastructure can be delivered in a timely manner to facilitate settlement expansion. The requirement for new dwellings will be based on an objective assessment of local needs and this will take into account the latest available information, including that pertaining to USAF Lakenheath and any policies they have with regard to the relocation of USAF personnel. Any change in USAF policy with regard to housing can also be considered within the context of a Local Plan review as their intentions become more apparent.	No action required.
20324	Object	The current policy does not comply with the baseline Infrastructure Capacity evidence. Creating artificial phasing in this way will simply hold back development, and prevent the creation of much needed housing in a sustainable location.	The allocation of 670 homes and the phasing of its delivery in the plan period to 2031, as identified within the original Core Strategy policy CS7, was evidence based and underpinned by a robust assessment of existing and required infrastructure to support the envisaged growth of this settlement. Similarly, any revision to the overall allocation will need to be appropriately evidence based to ensure that the fundamental and required infrastructure can be delivered in a timely manner to facilitate settlement expansion. There remains an embargo on new green-field development until post 2015 to allow upgrades to the waste water treatment capacity or until such a time as sufficient capacity is provided.	No further action required at this stage.
20363	Object	No - without full account being taken of all the points I've made in my previous responses in questions 10 & 11 of this consultation.	The level of housing identified for Lakenheath will be based on a thorough and objective assessment of local needs as is required by the NPPF.	No further action required at this stage.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 13</i>				
20266	Comment	To accommodate the extra dwellings required (as indicated in our answer to Question 4) within the District, over and above those already allocated, it will be necessary to make a further allocation in Red Lodge.	The allocation of 670 homes in the plan period to 2031 as identified within the original Core Strategy policy CS7 was evidence based and underpinned by a robust assessment of existing and required infrastructure to support the envisaged growth of this settlement. Similarly, any revision to the overall allocation will need to be appropriately evidence based to ensure that the fundamental and required infrastructure can be delivered in a timely manner to facilitate settlement expansion. Were we to plan for a higher number of dwellings in the plan period then Red Lodge would be allocated a proportion commensurate with its position within the settlement hierarchy, (Core Strategy Policy CS1).	No further action required at this stage.
20404	Comment	Growth in Red Lodge would require additional GP infrastructure to be secured through developer provision/ funding to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13. The evidence base of Core Strategy Table 4.1 should be updated to reflect the above.	The allocation of 670 homes in the plan period to 2031 as identified within the original Core Strategy policy CS7 was evidence based and underpinned by a robust assessment of existing and required infrastructure to support the envisaged growth of this settlement. Similarly, any revision to the overall allocation will need to be appropriately evidence based to ensure that the fundamental and required infrastructure, (including GP provision), can be delivered in a timely manner to facilitate settlement expansion.	No further action required at this stage.
20325	Object	790 homes is far too many for a village with comparatively poor provision of services or facilities, it even lacks a primary school. There are also numerous geographical environmental constraints on where a development of this size could be located in a sustainable manner.	The allocation of 670 homes and the phasing of its delivery in the plan period to 2031 as identified within the original Core Strategy policy CS7 was evidence based and underpinned by a robust assessment of existing and planned infrastructure, (including school and village centre), to support the envisaged growth of this settlement. It was an allocation deemed sound at the examination stage having regard to the constraints on development, both physical and environmental, acting upon this settlement. Similarly, any revision to the overall allocation will need to be appropriately evidence based to ensure that the fundamental and required infrastructure can be delivered in a timely manner to facilitate settlement expansion and will have regard to all physical and environmental constraints.	No further action required at this stage.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 14</i>				
20267	Comment	Given the large number of dwellings due to be provided in the settlement every effort needs to be made to bring forward the completion date of 2020 for the required waste water treatment plant in order to enable development on new sites to take place.	The phasing of housing delivery within Red Lodge will be dependent on the timetable for delivery of the requisite infrastructure. The Core Strategy makes provision for delivery of homes prior to 2020 should requisite upgrades to the waste water treatment works be achieved in the intervening period. Delivery will be dependent on the work programmes of the responsible authorities including Anglian Water whom we will consult with throughout the Single Issue Review process.	No changes required at this stage.
20405	Comment	A phasing plan for development in this area should be agreed by FHDC and NHSS as part of the plan making process, to ensure that healthcare infrastructure is delivered in a timely manner to support planned growth.	Any revision to the overall allocation for Red Lodge will be appropriately evidence based to ensure that the fundamental and required infrastructure can be delivered in a timely manner to facilitate settlement expansion. This will include consideration of health/NHS requirements.	No further action required at this stage.
20326	Object	We contend there should be fewer homes in Red Lodge and as for a Key Service Centre, it has few services and facilities compared to other KSCs and furthermore there are environmental and geographic constraints severely constraining future sites for development. Accordingly, the numbers in each of the phasing targets should be reduced.	The allocation of 670 homes in the plan period to 2031, as identified within the 'original' Core Strategy policy CS7, was evidence based and underpinned by a thorough assessment of existing and required infrastructure to support the envisaged growth of this settlement in addition to consideration of the environmental constraints as identified by the respondent. It was considered at the examination stage that on completion of the village centre and school then the settlement would have the services and facilities commensurate with its status as a Key Service Centre. It is known that there are a number of constraints acting upon the settlement of Red Lodge and these will need to be taken into account at the next stage of the Single Issue Review process and when considering allocations in the context of the Site Allocations Local Plan framework. Discussions are ongoing with Natural England to identify suitable mitigation for the SPA that will allow development to come forward, mindful that any growth must be sustainable and in accordance with the Spatial Strategy, (Core Strategy Policy CS1).	No changes required at this stage.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 15</i>				
20406	Comment	<p>Growth in the primary villages would require additional GP infrastructure to be secured through developer provision/ funding to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13.</p> <p>The evidence base of Core Strategy Table 4.1 should be updated to reflect the above.</p>	<p>Comments around infrastructure requirements noted. Policy CS13 remains extant and will be used to consider planning applications at the appropriate stage. In the meantime, the IECA study supports the limited expansion of the Primary Villages.</p>	No direct action at this stage.
20420	Comment	<p>The Infrastructure and Environmental Capacity Appraisal (IECA) (2009) identifies a capacity range for each of the main towns, key service centres and primary villages within the District. The appraisal identifies the maximum capacity figures based on physical constraints. Rockhill Investments Ltd considers that this appraisal should inform the housing targets for West Row, as the appraisal identifies a higher capacity for housing development than previously indicated by the Core Strategy.</p>	<p>Comments noted. The IECA study identifies a theoretical capacity for all settlements based on infrastructure requirements / capacity. It should not necessarily be used as a direct indicator of the level of growth for each particular settlement since location, sustainability, particularly relatively speaking, is also a crucial factor.</p>	No direct response at this stage.
20388	Comment	<p>There should be more homes allocated to the Primary Villages as they are sustainable locations for growth, often close to towns. The Primary Villages offer areas of land on the edge of the settlements which lend themselves to house building without compromising the identity of the settlement.</p>	<p>It is agreed that the Primary Villages are sustainable settlements for proportionate housing growth, (in accordance with CS Policy CS1). Nonetheless, they remain less sustainable than the higher order Market Towns and Key Service centres so an effective balance must be struck.</p>	No direct action at this stage.
20283 20308	Object	<p>Answer C: The growth should reflect the predicted growth of local employment. The infrastructure of the bulk of these primary villages will not support the proposed numbers of new housing and the developments should be restricted to infill or use of derelict land, maximum of around a dozen properties per year but preferably less. If rapid and higher growth is required, suggest developing new villages/towns which can have the appropriate infrastructure designed in at the outset.</p>	<p>The IECA study is clear that the Primary Villages are suitable for reasonable levels of housing growth. Furthermore, extant Core Strategy Policy CS13 seeks to ensure that suitable infrastructure is provided at the appropriate time to support/facilitate development. Provision of completely new settlements is beyond the scope of the Single Issue Review as the Spatial Strategy for the District, (Policy CS1), is retained.</p>	No direct action at this stage.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20256	Object	<p>15a) Do you think 570 new homes spread across the primary villages by 2031 is still about right? Yes No</p> <p>The level of development in primary villages will likely be a factor of the overall level of annual delivery which has yet to be established.</p> <p>We consider that it should not be less than that set out in the Core Strategy and in fact should represent a greater proportion of the overall figure. There are a number of reasons that underpin this.</p> <p>Firstly there is demonstrable capacity in villages to accommodate growth in terms of land opportunities and freedom from environmental constraint. Sites exist with willing developers in several locations including our clients' sites at Kentford which are available for early delivery and which do not rely on significant infrastructure investment.</p> <p>Secondly there is evident continuing demand for housing in the larger villages which are well served by local and community services and in some cases also offer significant levels of local employment. That suggests that land allocated in primary villages is likely to be taken up and implemented, thereby helping ensure that the Council can demonstrate its requirement for a five year supply as well as assisting in meeting the overall delivery targets.</p> <p>Thirdly, the Council's intentions to allocate significant growth in Newmarket have been successfully challenged and we question the capacity to extend the town in light of the historic nature and the constraints arising from the horseracing industry. This again suggests that a higher proportion of housing in the primary villages which all lie within reasonable proximity to Newmarket would be the most satisfactory distributive strategy. Moreover, other of the districts towns, whilst serving the military bases and their immediate hinterland are less well placed to accommodate the level of commuter demand that will continue to have a significant impact on the housing market arising from road and rail connections.</p> <p>15b) Do you think there should be more homes for the primary villages? Yes No</p> <p>Why? Please give reasons for your response. For the reasons set out in relation to Q15a and specifically in relation to land opportunities in Kentford</p>	<p>Comments that the figure should not be lower than the previous figure are noted.</p> <p>Comments in relation to Kentford need to be balanced by the relative sustainability of the Primary Villages in relation to the higher order settlements and it is important that a sustainable balance is struck.</p>	No direct action at this stage

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>we consider that this village, at very least, would benefit from an increase in housing allocation reflective of accessibility, local employment opportunities and potential and capable of supporting existing services and promoting the delivery of improved or replacement community facilities such as a new village hall.</p> <p>Moreover, NPPF paragraph 55 is also relevant where it states: To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. That will mean concentrating development in the primary villages that can serve their rural hinterland as well as relating to factors such as demand and the urban areas.</p> <p>15c) Do you think there should be fewer homes for the primary villages? Yes No Why? Please give reasons for your response. These are sustainable locations, capable of supporting growth and the Council has had a demonstrable difficulty in delivering growth at the principal town. Increasing the level of housing in Brandon and Mildenhall will not be an adequate or appropriate means of meeting the housing requirement and increasing the growth in small villages will not help deliver or support local services.</p>		

Question 16

20407

Comment	A phasing plan for development in the primary villages should be agreed by FHDC and NHSS as part of the plan making process, to ensure that healthcare infrastructure is delivered in a timely manner to support planned growth.	Noted. NHSS will have an opportunity to comment again at the Submission Version consultation, and again through the Examination.	No direct action.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20287	Comment	<p>The former phasing "backloads" the delivery of new homes by concentrating a greater proportion of the Primary Village allocation in the period 2021-2031.</p> <p>There has been a history of persistent under-delivery of housing within Forest Heath District. We therefore suggest that the phasing should be "frontloaded" to bring a greater proportion homes forward earlier on in the plan period and ensure an adequate supply of housing. We also suggest that the phasing figures should be expressed as cumulative minima and could be exceeded to ensure the delivery of sufficient housing across the Primary Villages</p>	<p>The principle of bringing phasing forward to encourage earlier delivery is accepted. However, this argument is equally applicable in relation to towns and key service centres, and relative sustainability merits would suggest that if phasing is to be altered anywhere then it should be at the higher order settlements first.</p>	No direct action.
20421	Object	<p>The Infrastructure and Environmental Capacity Appraisal (IECA) (2009) identifies a capacity range for each of the main towns, key service centres and primary villages within the District. The appraisal identifies the maximum capacity figures based on physical constraints. Rockhill Investments Ltd considers that this appraisal should inform the housing targets for West Row, as the appraisal identifies a higher capacity for housing development than previously indicated by the Core Strategy.</p> <p>Please refer to Question 20 regarding the proposed housing target and phasing for West Row</p>	<p>Comments noted. The IECA study identifies a theoretical capacity for all settlements based on infrastructure requirements / capacity. It should not necessarily be used as a direct indicator of the level of growth for each particular settlement since locational sustainability, particularly relatively speaking, is also a crucial factor.</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20257	Object	<p>With regard to the Primary Villages there is no justification for a phased approach of this sort. Demonstrably it is impossible to regulate housing provision at a micro level and the refusal of planning permission because of an untenable 'phasing' regime is unlikely to be supported by the Secretary of State on appeal given the emphasis in the NPPF on boosting significantly the supply of housing (paragraph 47) and the clear statement in the Introduction that: 'Development that is sustainable should go ahead, without delay'</p> <p>Moreover it is wholly unnecessary as, elsewhere in paragraph 47, the Framework specifically requires a planning authority to: 'identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements'</p> <p>Any regulation of supply, although we do not accept in any respect that supply should be regulated, can be managed through this mechanism of ensuring that additional sites are brought forward to secure a 5 year supply (plus 20% in the case of Forest Heath where undersupply has been significant and persistent - past AMR's refer.)</p>	<p>Reference to the NPPF is noted. An appropriate scale of development and indicative phasing will be considered at the next stage of the Local Plan process.</p> <p>In the interim the authority will be rolling forward its 5 Year land supply and preparing its Annual Monitoring Report.</p>	No action required.
20389	Object	<p>The phasing of new homes in the Primary Villages is currently underestimated and unrealistic and more homes need to be phased earlier. Job growth in the district is currently higher than housing growth and this is unsustainable. A front-loading approach is required with more homes being built sooner to provide balanced growth and improve the economy of the district.</p>	<p>Assuming higher job growth than housing growth then it does not necessarily follow that housing growth should be brought forward in the Primary Villages, rather a more sustainable solution would be, in this scenario, to amend the phasing in the higher order settlements where the majority of job growth is expected to occur.</p>	No direct action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 17</i>				
20409	Comment	<p>Growth in Beck Row would require additional GP infrastructure to be secured through developer provision/ funding to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13.</p> <p>The evidence base of Core Strategy Table 4.1 should be updated to reflect the above.</p>	<p>Comments noted. The IECA study and extant policy CS13 support limited further growth subject to suitable and necessary infrastructure improvements where required.</p>	No direct action.
20303	Support	<p>The Parish Council Reponse:</p> <p>a. 175 new homes for Beck Row is about right. b. No more homes for Beck Row - Enough new homes have been built and there is inadequate community facilities, lack of infrastructure, problems with aircraft noise, and very few jobs in the village</p>	Noted.	No direct response at this stage.
<i>2.15</i>				
20278	Object	<p>Although the numbers and timeframe quoted are lower than those recently proposed by developers, they are still higher than numbers we feel could be absorbed into Exning without putting infrastructure under strain and destroying the character of Exning as a separate village. There is already a clear indication that residents are not generally in favour of development other than carefully phased in-fill and nor does there seem to be proven evidence that the large numbers of proposed for Forest Heath are actually needed</p>	<p>The Analytics Cambridge work demonstrates that the need for homes in Forest Heath remains broadly as specified in the Core Strategy. The IECA study also demonstrates that sufficient capacity exists in the settlement for modest levels of growth.</p>	No direct action.
<i>Question 18</i>				
20390	Comment	<p>Exning is an ideal and sustainable location for growth and therefore there should be an increase in the number of new homes built here. Exning could effectively accommodate additional growth whilst retaining its characteristics of a village on the outskirts of a town. Additional homes in Exning would have a positive impact upon the district.</p>	<p>Comments around growth noted. However, the settlement remains less sustainable than higher order settlements and the Spatial Strategy has been retained. Any growth must be sustainable and be in accordance with the infrastructure ceiling identified within the IECA study.</p>	No direct action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20410	Comment	<p>Growth in Exning would require additional GP infrastructure to be secured through developer provision/ funding to reconfigure existing floorspace, expand existing floorspace or provide new floor space, as appropriate (all floor space to be equipped) in line with the NPPF and adopted Core Strategy Policy CS13.</p> <p>The evidence base of Core Strategy Table 4.1 should be updated to reflect the above.</p>	<p>Infrastructure requirements noted. Policy CS13 seeks to secure effective infrastructure provision at the appropriate stage.</p>	No direct action.
20306	Object	<p>Answer C: There should be fewer homes built in Exning. More homes could however be built adjacent to areas offering higher levels of employment. The infrastructure within Exning can barely support the existing number of houses, the local roads are already congested and driving through or parking within the village can be difficult at the best of times.</p>	<p>The IECA study suggests that there is sufficient infrastructure capacity within Exning for modest levels of growth over the plan period. The principle of matching major growth to employment areas is sound and accepted. The issue of parking can be addressed alongside planning applications for any new development proposed within the village.</p>	No direct action.
20347	Object	<p>The number of new homes by 2031 should be fewer than 175 because the existing infrastructure will not support that level of building. In particular, improvements are needed to roads and more places are needed in Exning Primary School.</p>	<p>The findings of the IECA study suggest that there is sufficient infrastructure capacity within Exning to support modest levels of growth. The level of growth will accord with the Spatial Strategy, (Policy CS1).</p>	No direct action
20244	Support	<p>I consider 175 houses by 2031 to be perfectly reasonable as long as it is spread evenly over the 19 years. Greater growth in housing than this would be beyond the resources and infrastructure in the village and would be detrimental to the life of the village and its inhabitants.</p>	<p>The previous strategy sought to spread the 700 dwellings proposed for the 4 primary villages over a 21 year period to 2031. It remains the case that, regardless of numbers, a phased approach to development is a reasonable approach albeit it would be unrealistic to expect a 21 year built out period across all four of the primary villages individually, rather it would be the overall number across all four which would be phased throughout the 21 year period, with potentially larger and more concentrated delivery in each of the four settlements.</p>	No direct action at this stage.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 19</i> 20284	Comment	Comments on not spreading the Primary Village allocation equally across the four identified settlements, but directing a greater proportion of this allocation to Kentford on the grounds that it is a more sustainable location for accommodating new homes.	The four primary villages all contain broadly similar levels of services and facilities, all of which are considered suitable for the growth necessary to support local services. It is not considered necessary therefore, at these modest levels of growth, to direct greater growth to Kentford than to the other Primary Villages.	No direct action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20258 20411	Object	<p>19a) Looking at the constraints, along with any others that you know of, do you think 175 new homes by 2031 is still about right for Kentford? Yes No We consider that there is significant potential for development at Kentford, especially to the east of the village without adverse effect on the landscape setting or other known environmental constraints. Whilst there are parts of the centre of the village that are subject to flood risk, it is desirable to keep the open character at the core of the community but that does not detract from the ability to extend the village sympathetically on land which has no amenity value, which is not in productive agricultural use and whose development would not affect the setting of the village, or be subject to other constraints such as noise, access or drainage.</p> <p>19b) Do you think there should be more homes for Kentford? Yes No Why? Please give reasons for your response. Kentford is a suitable location for development. It is easily accessible and in relative proximity to Newmarket. It has good, uncongested road access and public transport with regular connections to towns in the District as well as Bury and Cambridge suitable for journeys to work and social purposes. There is also good access to Kennett station which lies within 1700m of our client's land and therefore within reasonable walking distance and rather more accessible than much of Newmarket is to the station there. Notwithstanding this, Kentford also has a relatively high level of local employment, a good basic range of local services and facilities and, moreover a strong sense of community. Development also gives the opportunity to secure a replacement village hall, which has become an important local issue and is unlikely to be secured other than by the allocation of suitable land and the secure means to ensure its funding. As a result of these considerations it is considered that Kentford is a suitable location in which further growth can and would be readily assimilated and which would help support existing services.</p>	<p>Kentford is a clearly sustainable location for modest further growth. Nonetheless, despite its inherent sustainability it still relies on higher order settlements for much of its services and facilities and it remains demonstrably less sustainable than either the key service centres or the towns. It is for this reason that growth there, which is necessary to support the existing local services, must be proportionate and must recognise the role that Kentford plays in the overall settlement hierarchy.</p>	No direct action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>19c) Do you think there should be fewer homes for Kentford? Yes No Why? Please give reasons for your response. There are no demonstrable planning reasons in terms of environmental constraints, physical or community infrastructure which would justify a reduction in the contribution that Kentford could make to overall housing provision and to do so would significantly prejudice the potential sustainability of the community, its ability to provide for a range of housing and sustain its population whilst also implying that other less sustainable communities would need to accept more growth.</p>		
<i>Question 20</i>				
20245	Object	<p>West Row is classified as a Primary Village and should provide a reasonable share of the estimated shortfall in the Plan Period. Sites WR04, WR06 and WR19 owned by the Representor and his brother were selected as Preferred Sites but subsequently deleted. Noise and highway objections for that de-selection were invalid as explained in the Full Representation, and the sites should therefore be reinstated as Preferred Sites and allowed to contribute to provision of the estimated shortfall in housing provision in the District, regardless of any decision concerning the sites in Beeches Road.</p>	<p>Comments on acceptable level of growth for West Row noted. Comments on specific sites will be assessed via Site Allocations Local Plan process, (and informed by the SHLAA).</p>	No action required.
20412 20422	Object	<p>The Infrastructure and Environmental Capacity Appraisal (IECA) (2009) identifies a capacity range for each of the main towns, key service centres and primary villages within the District. The appraisal identifies the maximum capacity figures based on physical constraints. Rockhill Investments Ltd considers that this appraisal should inform the housing targets for West Row, as the appraisal identifies a higher capacity for housing development than previously indicated by the Core Strategy.</p>	<p>Theoretical infrastructure capacity is not the only determinant behind housing numbers for each settlement. Issues of locational sustainability are important, as are ensuring sufficient growth is allocated to all suitable settlements to help support existing services. It is for this reason that it is not considered suitable to propose growth in West Row up to its hypothetical infrastructure capacity.</p>	No direct action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Question 21</i>				
20285	Comment	There has been a history of under-delivery of housing within Forest Heath District. By cutting the time to deliver all the new homes, this will increase pressure on the Council to release land for housing sooner. This is likely to result in more houses being built thus addressing under-delivery issues. Furthermore, the NPPF states that local plans should be drawn up preferably over a 15-year time horizon. Therefore, we consider that the period should be cut to 15 years after the adoption of the plan.	Comment noted. If the plan period is shortened but the annual requirement remains, there could be less pressure to allocate so many sites within the context of the Site Allocations Local Plan document. This in turn could reduce the pressure on allocating constrained sites.	No further actions required at this stage.
20298	Comment	The suggestion that "all the new homes" be delivered in a shorter period is unrealistic and from the supporting text does not appear to be what the Council is actually proposing. If the Council is suggesting initially planning for delivery of sufficient new homes to meet the planned requirement for a 15 year period then that has some merit.	As noted, to reduce the plan period does not necessarily mean increasing the annual requirement, i.e. building the same number of dwellings in a shorter period.	No further actions required at this stage.
20275 20314 20345 20413	Object	Target end dates are meaningless, build at a rate to satisfy local demand and employment prospects. If high rate growth is required, recommend purpose built settlements with all the infrastructure and transport links designed in at the outset.	Any housing target/requirement will be based on a full and objective assessment of local need. To plan for a higher number of dwellings than the original Core Strategy policy CS7 does not necessarily lead to the requirement for completely new settlements although it does mean that the requisite infrastructure needs to be in place to facilitate the growth regardless of this.	No further action required at this stage.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20259	Object	The planning system should reflect the fundamental tenets of delivering a plan led system (NPPF paragraph 17) that will: proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort needs to be made to objectively identify the growth needs of the area . To reduce the timescale would be an abrogation of the responsibility on an elected authority to take decisions however challenging they may be but that are in the best interests of setting out a strategy for wellbeing in the district. It would merely defers decisions on infrastructure investment that ought properly to be taken now and also make it increasingly difficult to ensure that an adequate supply of housing land is available meaning that further reviews of the plan would be needed creating uncertainty and increasing cost.	Response noted. The Infrastructure appraisal that underpinned the adopted Core Strategy Policy CS7 covered the planning period to 2031. The document merely identifies that, in line with the requirements of the NPPF, the plan period could be reduced.	No action required.
20424	Support	We agree that shortening the plan period would help reduce the burden of delivery of new housing on environmentally constrained sites.	Point noted.	No change required at this stage.
<i>Question 22</i>				
20414	Comment	If annualised targets are specified this would provide greater certainty to the NHSS healthcare strategy for the area.	Comment noted. Annual targets are useful for monitoring purposes.	No actions required.
20299	Comment	The Council should not scrap the end date as it will leave too much uncertainty. Similarly it is not a good idea for the plan only to include a notional yearly target.	Comment noted.	No actions required at this stage.
20276 20286 20313	Object	Build at a rate to satisfy local demand, otherwise we could end up in the same position as Red Lodge where supply is outstripping demand and new houses remain unoccupied.	The overall housing targets will be based on objectively assessed local needs. It is accepted that at certain periods build rates will slow as a consequence of prevailing economic conditions. This is why a target is useful for the purposes of monitoring.	No actions required at this stage.
20346	Object	The council should retain the end date of 2031.	Comment noted.	No changes required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue</i>	<i>Council's Assessment</i>	<i>Action</i>
20260	Object	<p>Or the council could not set an end date at all but have an annual rolling target instead which could be changed as necessary.</p> <p>22a) Should the council not specify an end date by which all the new homes should be built? No Whilst superficially attractive the NPPF makes clear the Government's commitment to a plan led planning system and for that reason alone, it will be necessary to determine how much land it is necessary to identify over a given period. A horizon of 2031 is therefore an appropriate target date and in line with good practice elsewhere.</p> <p>22b) Should the council have an annual target instead? No Whilst an annual target may be useful for monitoring delivery and ensuring an adequate supply of land is available, as noted in relation to Q16b, development that is sustainable should go ahead, without delay. Annual targets should only therefore be used for monitoring and should not be used for the purposes of regulating supply.</p>	<p>Comments noted with regard to the end date and the need to accord with NPPF guidance. An Annual Monitoring Report will continue to be prepared and used to assess whether or not any future review of the Local Plan is required.</p>	No action required.
20357	Object	<p>Yes definitely. It is not necessary to make these huge assumptions for housing specially when the calculations are not correct.</p>	<p>Comment noted.</p>	No change required.