

**Forest Heath District Council**

**Single Issue Review (SIR)  
of Core Strategy Policy CS7  
Overall Housing Provision and Distribution**

**And**

**Site Allocations Local Plan**

**Regulation 22 Statement**

**March 2017**

## Contents

<b>1. Introduction</b> .....	3
<b>2. Bodies and persons invited to make representations under Regulation 18</b> .....	5
<b>3. How bodies and persons were invited to make representations under regulation 18</b> .....	6
<b>4. Regulation 20: Core Strategy Single Issue Review and Site Allocations Local Plan Proposed Submission</b> .....	21
<b>5. Conclusions</b> .....	25
Annex A: Organisations and persons invited to make representations under Regulation 18 .....	26
Annex B: Local Plan consultation letter August 2015 .....	29
Annex C: Local Plan consultation poster August 2015 .....	32
Annex D: Core Strategy Single Issue Review Issues and Options (2015): Summary of key issues raised during the 2015 Issues and Options consultation .....	33
Annex E: Site Allocations Local Plan Issues and Options (2015): Summary of key issues raised during the 2015 Issues and Options consultation .....	37
Annex F: Local Plan preferred options consultation letter April 2016 .....	41
Annex G: Local Plan preferred options consultation extension letter .....	44
Annex H: Local Plan preferred options consultation poster April 2016 .....	46
Annex I: Summary of key issues raised during the 2016 Core Strategy Preferred Options consultation and how the submission document addresses these issues .....	47
Annex J: Summary of the key issues raised during the 2016 Site Allocations Local Plan Preferred Options consultation and the submission document addresses these issues .....	49
Annex K: Regulation 19 consultation letter and Statement of Representation .....	61
Annex L: Publication of Sustainability Erratum: notification of extension to Forest Heath District Council Local Plan Regulation 19 Consultation .....	67
Annex M: Regulation 19 consultation leaflet .....	69
Annex N: Summary of issues raised at Regulation 19 consultation events .....	70
Annex O: Summary of key objections received to Proposed Submission Single Issue Review of Core Strategy Policy CS7 .....	74
Annex P: Summary of key objections received to Proposed Submission Site Allocations Local Plan .....	77

## 1. Introduction

- 1.1 The Single Issue Review (SIR) of Core Strategy Policy CS7 and the Site Allocations Local Plan (SALP) are key development plan documents which form part of the Forest Heath Local Plan.
- 1.2 Prior to submitting the above development plan documents to the Secretary of State, the council must comply with Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This requires a statement setting out
- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
  - (ii) how those bodies and persons were invited to make representations under regulation 18,
  - (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
  - (iv) how any representations made pursuant to regulation 18 have been taken into account;
  - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
  - (vi) if no representations were made in regulation 20, that no such representations were made;
- 1.3 The Council is committed to consulting continuously throughout preparation of their Local Plan and ensuring that the whole community has the opportunity to engage in the planning process in a meaningful way. One of the tests of soundness that the Planning Inspectorate will use to judge the SIR and SALP documents is whether:
- "The Development Plan Document has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the regulations where no SCI exists".*
- 1.4 This statement of engagement and consultation sets out the ways in which the Council has engaged the community in the preparation of the SIR and SALP Documents in accordance with the regulations and the council's SCI (2014). It provides details of who has been involved, when and how they have been engaged in the process.
- 1.5 Forest Heath District Council and St Edmundsbury Borough Council share a Statement of Community Involvement which was adopted in February 2014. Full details of the councils SCI can be found at:  
[http://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/Adopted-version-SCI.pdf](http://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/Adopted-version-SCI.pdf)

## Consultations undertaken

- 1.6 Several stages of consultation and engagement have taken place in preparing the Proposed Submission versions of the SIR and SALP documents. These were undertaken under Regulation 18 and 19. These are summarised below:

<b>Regulation</b>	<b>Consultation stage</b>	<b>Date</b>
Regulation 18	SIR Initial Issues and Options	July – September 2012
Regulation 18	Local Plan Issues and Options Consultation (SIR and SALP)	11 August – 6 October 2015
Regulation 18	Local Plan Preferred Options Consultation (SIR and SALP)	4 April – 1 July 2016
Regulation 19	Local Plan Proposed Submission Consultation (SIR and SALP)	10 January – 13 March 2017

## **2. Bodies and persons invited to make representations under Regulation 18**

- 2.1 During the various consultation stages the council invited a large number of people, organisations and groups to make representations. A database has been compiled comprising the specific consultees and general consultees (as defined in the regulations and SCI in effect at the specific time) and many other groups, bodies, organisations and individuals that have an interest in the Local Plan process.
- 2.2 The database has been updated at the request of people and organisations that have become involved in the process and wished to be notified of further stages. At each stage a letter or email of the specific consultation has notified all those on the database. The community at large has also been consulted and invited to make representations through press notices and releases and other general publicity measures which are set out in further detail below.
- 2.3 A full list of those statutory consultees contacted at each stage is included at Annex A. The council is satisfied that the engagement and consultation process is in accordance with the regulations.

### **3. How bodies and persons were invited to make representations under regulation 18**

#### Issues and Options consultations: (July – September 2012 and August - October 2015)

- 3.1 The first round of consultation on the Core Strategy Single Issue Review document, the initial issues and options stage, took place between July and September 2012.
- 3.2 In August and September 2012 six exhibitions were held in Mildenhall (2), Brandon (1) and Newmarket (3). Approximately 290 people attended. 87 people made formal representations raising some 230 issues and these are summarised in the Public Participation Report which is available online at <https://democracy.westsuffolk.gov.uk/Data/Forest%20Heath%20Local%20Plan%20Working%20Group/20130704/Agenda/LPG%20FH%2013%2007%2004%20relop13007%20appA.pdf>

#### Core Strategy Single Issue Review and Site Allocations Local Plan Issues and Options consultation (August – October 2015)

- 3.3 There was a gap of a few years between the initial and options Single Issue Review and the next round of consultation in 2015. This was to allow further evidence and advice to be obtained and the Sustainability Appraisal Scoping Report to be updated. The decision was made during this time to proceed with preparation of the Core Strategy Single Issue Review and Site Allocations Local Plan in tandem. An issues and options consultation on the Core Strategy Single Issue Review and Site Allocations Local Plan took place between the 11 of August and the 6 of October 2015.

#### **How they were consulted**

- 3.4 The letter and poster informing key organisations and individuals, including statutory consultees, about the Issues and Options consultation are attached at Annexes B and C.
- 3.5 To ensure an inclusive consultation, methods of consultation set out in the adopted 2014 Statement of Community Involvement were used. Each of these methods is set out below.

#### Local Press

- 3.6 A press release was sent to local newspapers to advertise the beginning of the consultation period. An example of the press coverage in the Mildenhall Journal can be seen below.

# New homes: time for residents to have a say

**Residents across the Forest Heath area are being asked how many new homes should be built in the district and where they should go**

The eight week consultation, launched this week, which will also look at where associated development such as schools, roads and businesses should be, is the first step in a two-year process which should come to fruition in August 2017 with the formal adoption of a new local development blueprint. Residents are being given the opportunity to comment on two elements of the plan, which sites should be allocated for development, and the single issue review, which looks at the number of homes and where they should be built over the next 15 years. "I encourage everyone who

lives and works in Forest Heath to have their say. The decisions we take over the next year or so will have a real effect on the prosperity of our future generations and we need to get them right," said Cllr James Waters, leader of Forest Heath District Council. "The Local Plan must take account of local needs, be sustainable and be practical – we have to be able to deliver it. It's up to everyone with a stake in Forest Heath's future to make sure it does the job." Residents can respond online or on a comments form which is being made available. Meetings and drop-in sessions in Newmarket, Lakenheath, Mildenhall, Red Lodge and Brandon, plus market stalls

**'The decision we take will have a real effect on future generations.'**

in the district's three towns are also being planned. The consultation puts forward a number of suggested sites for development and also calls for people to put forward any potential sites not identified

so far, including sites for travellers.

Responses from the first round of consultation will be used to decide

the preferred options which will be made public in spring next year for further consultation.

The responses from that consultation will help to develop the proposed submission document which will also be consulted upon before it is submitted to the Secretary of State. A public enquiry will follow, with formal adoption due in August 2017.

Figure 1. Extract from Mildenhall Journal 13 August 2015

## Consultation events

- 3.7 The council held a number of consultation events (see table on page 8) across the district during the consultation period. Posters advertising the drop-in events were put in strategic locations and advertised in the local press as outlined above. Details of all of the events were given to Parish Councils for distribution in local newsletters/magazines where possible.

<b>Forest Heath Site Allocation Local Plan and Single Issue Review further Issues and Options consultation events 2015</b>	
<b>Date/Time</b>	<b>Venue</b>
Friday 4 September, 4pm – 7pm	Brandon Library, within the Brandon Centre, Bury Road, Brandon.
Monday 7 September, 4pm – 7pm	Peace Memorial Hall, High Street, Lakenheath.
Wednesday 9 September, 4pm – 7pm	Forest Heath District Council's offices, College Heath Road, Mildenhall.
Thursday 10 September, 10am - 1pm	Brandon Market.
Tuesday 15 September, 4pm – 7pm	The Severals Sports Pavilion, Bury Road, Newmarket
Wednesday 16 September, 4pm – 7pm	Red Lodge Sports Club & Pavilion, Hundred Acre Way, Red Lodge.
Friday 18 September, 10am – 1pm	Mildenhall market
Saturday 19 September, 10am – 1pm	Newmarket market

Information boards and posters/leaflets

- 3.8 A set of A2 poster boards were produced outlining the key ideas and the reasoning behind the consultation. These were used at the consultation events, an example of which can be seen below. Leaflets were distributed at the events detailing how people could respond to the consultation.





Figure 2. A2 poster boards at the Brandon Market Consultation event on 10 September 2015

## Website

- 3.9 The consultation documents and supporting documentation were placed on the council's dedicated public consultation website, where consultees were able to make online representations <http://westsuffolk.jdi-consult.net/localplan/>. The key consultation documents were also made available on CD and distributed at consultation events.

## Social media

- 3.10 The council's Twitter and Facebook feeds were used to advertise the consultation events and generate interest in the consultation. An example of the Tweets sent out to promote the 2015 consultation can be seen below.



Figure 3. Forest Heath District Council's Twitter feed: 2015 Issues and Options consultation

- 3.11 Other methods of consultation used during the consultation period included;

- A workshop for the Newmarket Vision delivery groups in September 2015;
- An internal Councillors surgery on the 1 April 2015;

## Availability of documents

3.12 The Issues and Options consultation comprised the Core Strategy Single Issue Review of Policy CS7 document and accompanying Sustainability Appraisal and Habitat Regulations (Screening) Assessment and the Site Allocations Issues and Options document and accompanying Sustainability Appraisal and Habitat Regulations (Screening) Assessment. Hard copies of all consultation documents were placed in the deposit points in accordance with West Suffolk Councils' adopted Statement of Community Involvement at:

- Forest Heath District Council Offices, College Heath Road, Mildenhall, Suffolk, IP28 7EY
- Newmarket Customer Information, 63 The Guineas, Newmarket, Suffolk CB8 8HT
- Brandon Library, The Brandon Centre, Bury Road, Brandon, IP27 0BQ

3.13 Letters/emails were sent to each person/organisation on the planning database, including all statutory consultees. Advertisements and the Council's website were also utilised to make the public aware that comments could be made on the documents.

## Consultation responses – Core Strategy Single Issue Review Issues and Options

3.14 In total 364 representations were received to the Single Issue Review Issues and Options consultation from 98 respondents in the form of website, email and paper responses.

<b>August-October 2015</b>					
<b>Single Issue Review of Core Strategy Policy CS7 Issues and Options</b>					
<b>Document</b>	<b>Number of respondents</b>	<b>Total representations received</b>	<b>Object</b>	<b>Support</b>	<b>Comment</b>
Core Strategy Single Issue Review (CS SIR)	98	364	89	31	244
CS SIR Sustainability Appraisal	3	3	0	0	3
CS SIR Habitat Regulations Screening Assessment	3	3	0	0	3

3.15 All of the representations received, and officer responses to the representations, were entered onto the consultation database and were

made available to view online at <http://westsuffolk.jdi-consult.net/localplan/readdoc.php?docid=185>

### Summary of main issues raised

3.16 The main issues to arise from the consultation are set out in Annex D and are summarised below:

- Housing target cannot be determined until closure of Mildenhall airbase has been taken into consideration
- It is not clear why the council considers there are only two realistic options for housing quantum
- The higher growth option of 7700 homes should be brought forward
- Higher levels of growth in Brandon should be provided
- Natural England commented that the Stone Curlew nesting buffer data should be updated
- Insufficient infrastructure in the towns and rural areas to cope with additional growth
- Traffic congestion issues in Newmarket have not been identified
- Secondary villages and smaller settlements should not be ruled out for development
- The use of the words high/medium/low to describe the distribution options could be misinterpreted.

### Consultation responses – Site Allocations Local Plan Issues and Options

3.17 In total 893 representations were received to the Site Allocation Local Plan Issues and Options consultation from 133 respondents in the form of website, email and paper responses.

<b>August-October 2015 Site Allocations Local Plan Issues and Options</b>					
<b>Document</b>	<b>Number of respondents</b>	<b>Total representations received</b>	<b>Object</b>	<b>Support</b>	<b>Comment</b>
Site Allocations Local Plan (SALP)	133	893	93	69	731
SALP Sustainability Appraisal	5	5	1	0	4
SALP Habitat Regulations Screening Assessment	6	7	0	0	7

3.18 All of the representations received, and officer responses to the representations, were entered onto the consultation database and were made available to view online at <http://westsuffolk.jdi-consult.net/localplan/readdoc.php?docid=186>

## **Summary of main issues raised**

3.19 The main issues to arise from the consultation are set out in Annex E and are summarised below:

- Heritage assets as potential constraints should be identified consistently in the Plan
- RAF Mildenhall should be included as a site in the Plan
- Settlement boundaries for the secondary villages should be amended
- Sites in Lakenheath should be deferred due to uncertainty of RAF/USAF operations
- The level of development proposed for Brandon is not sustainable
- Mildenhall is capable of absorbing high levels of growth
- No development in Mildenhall should be allocated until it has been demonstrated that it will not result in a likely significant effect on internationally important nature conservation sites
- Traffic conditions in Newmarket have not been accurately set out
- Further development in Newmarket will reduce the town's appeal as a centre for race horses
- Lack of appropriate infrastructure in Lakenheath to support growth or the village's status as a KSC
- Red Lodge is not a sustainable option for growth. It relies on the majority of development being placed in one rural location, void of services, infrastructure and employment opportunities
- Large scale growth opposed in Kentford
- Growth in West Row is constrained by infrastructure.

### Core Strategy Single Issue Review and Site Allocations Local Plan Preferred Options (April – July 2016)

3.20 Consultation on the Core Strategy Single Issue Review Preferred Option and the Site Allocations Local Plan Preferred Options documents took place between the 4 April and 1 July 2016. This period of consultation was extended to allow consultees adequate time to consider a 2016 update to the 2009 Forest Heath Transport Technical Note which became available during the consultation period (see letters in Annexes F and G).

3.21 The consultation undertaken on the Forest Heath Site Allocations Local Plan and Core Strategy Single Issue Review Preferred Options documents followed the requirements of the Council's adopted Statement of Community Involvement (SCI) (2014).

## **Who was consulted**

3.22 The Council maintains a database of contacts which accords with the list of consultees listed in the SCI. The list of statutory consultees and specific consultation bodies who were written to is contained in Annex A.

3.23 Letters were sent to all contacts registered on the Local Plan database informing them of the Preferred Options consultation. Individuals are also given the opportunity to have their name put on the Council's database to be notified of consultations at each stage of the Local Plan process. The letters and accompanying leaflet sent to notify people of the consultation are attached at Annexes F, G and H.

Town and Parish Councils

3.24 All Parish and Town councils within the district, as well as those neighbouring the districts, were included on the consultation database and notified of the Core Strategy Single Issue Review and Site Allocations Local Plan Preferred Options consultation.

**How they were consulted**

3.25 The consultation methods set out in the adopted statement of Community Involvement were used. Each of these methods is set out below.

Local Press

3.26 The poster at Annex H was placed as an advert in The Newmarket Weekly News on 30 March 2016 and The Newmarket Journal on 31 March 2016 to advertise the start of the consultation period and the drop-in events taking place across the district.

Consultation events

3.27 The following council-run consultation events were held across the district during the consultation period. Posters advertising these drop-in events were advertised in the local press as outlined above and on the Local Plan pages of the council's website. In addition, details of all of the events were given to Parish Councils for distribution in local newsletters/magazines where possible.

<b>Forest Heath Site Allocation Local Plan and Single Issue Review Preferred Options 2016</b>	
<b>Date</b>	<b>Venue</b>
Friday 8 April, 4pm-7pm	The Brandon Centre (inside Brandon Library), Bury Road, Brandon
Tuesday 12 April, 4pm – 7pm	Forest Heath District Council's offices, College Heath Road, Mildenhall
Saturday 16 April, 10am – 1pm	Newmarket Guineas Shopping Centre, Newmarket

<b>Forest Heath Site Allocation Local Plan and Single Issue Review Preferred Options 2016</b>	
<b>Date</b>	<b>Venue</b>
Tuesday 19 April 4pm – 7pm	The Kentford Public House, Bury Road, Kentford
Thursday 21 April, 4pm – 7pm	Peace Memorial Hall, High Street, Lakenheath
Tuesday 26 April, 4pm – 7pm	Red Lodge Sports Pavilion, Hundred Acre Way, Red Lodge
Thursday 28 April, 4pm – 7pm	Newmarket Town Council, Memorial Hall, High Street, Newmarket
Tuesday 3 May, 4pm – 7pm	West Row Village Hall, Beeches Road, West Row
Thursday 12 May, 10am – 1pm	Brandon Market
Wednesday 18 May 4pm – 7pm	Exning Community Church Hall, Church Lane, Exning
Friday 20 May, 10am – 1pm	Mildenhall Market
Tuesday 24 <sup>th</sup> May 4pm – 7pm	Beck Row Community Centre (next to Beck Row Primary School, Lamb Close), Beck Row

#### Information boards and posters

3.28 A set of A2 poster boards were produced outlining the key ideas and the reasoning behind the consultation. These were used at the consultation events, an example of which can be seen below. Leaflets were distributed at the events detailing how people could respond to the consultation.

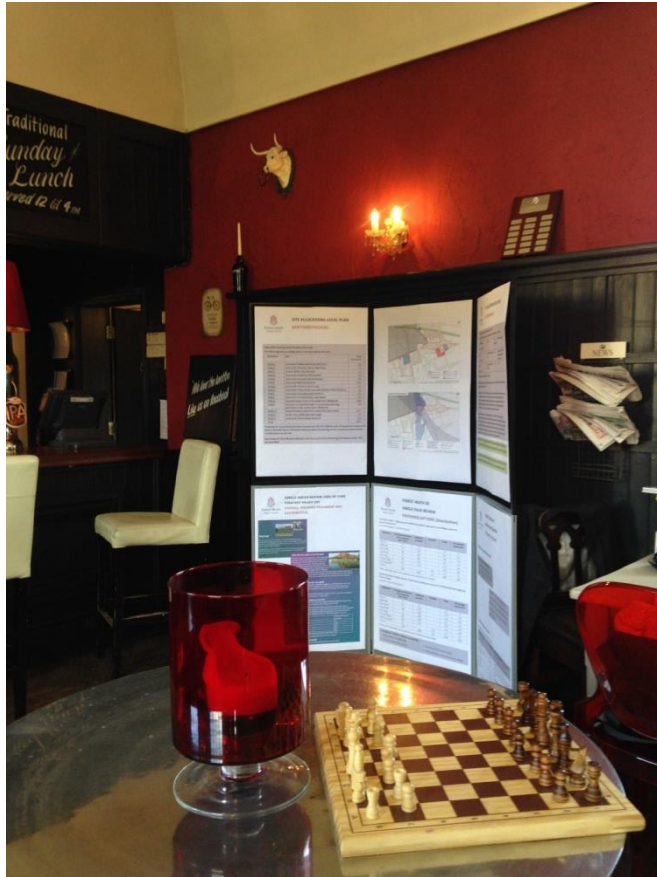


Figure 4: A2 poster boards in The Kentford Public House

### Website

- 3.29 The council used its own dedicated public consultation website to display consultation documents and supporting documentation <http://westsuffolk.jdi-consult.net/localplan/> The key consultation documents were also made available on CD and distributed at consultation events.

### Use of social media

- 3.30 The council's Twitter and Facebook feeds were used to advertise the consultation events and generate interest in the consultation. An example of the Tweets sent out to promote the 2016 consultation can be seen below.



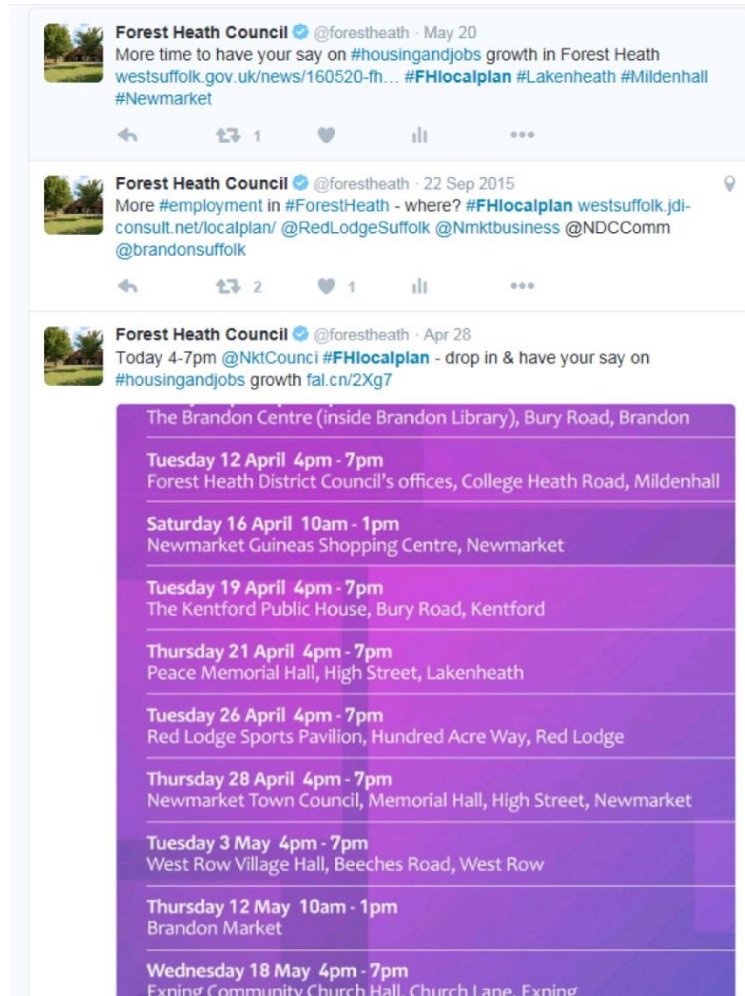


Figure 5. Forest Heath District Council's Twitter feed: 2016 Preferred Options consultation

### Other methods of consultation

- 3.31 Other methods of consultation used during the consultation period were an internal Councillors' surgery on the 1 of April 2016.

## Availability of documents

3.32 The Preferred Options consultation comprised the Core Strategy Single Issue Review of Policy CS7 document and accompanying Sustainability Appraisal and Habitat Regulations (Screening) Assessment and the Site Allocations Issues and Options document and accompanying Sustainability Appraisal and Habitat Regulations (Screening) Assessment. Hard copies of all consultation documents were placed in the deposit points in accordance with West Suffolk councils' adopted SCI at:

- Forest Heath District Council Offices, College Heath Road, Mildenhall, Suffolk, IP28 7EY
- Newmarket Customer Information, 63 The Guineas, Newmarket, Suffolk CB8 8HT
- Brandon Library, The Brandon Centre, Bury Road, Brandon, IP27 0BQ

3.33 Letters/emails were sent to each person/organisation on the planning database, including all statutory consultees. Advertisements and the Council's website were also utilised to make the public aware that comments could be made on the documents.

## Consultation responses – CS Single Issue Review Preferred Option

3.34 In total 152 representations were received to the Core Strategy Single Issues Review Preferred Options consultation from 51 respondents in the form of website, email and paper responses.

<b>April-July 2016 Single Issue Review of Core Strategy Policy CS7 Preferred Option</b>					
<b>Document</b>	<b>Number of respondents</b>	<b>Total representations received</b>	<b>Object</b>	<b>Support</b>	<b>Comment</b>
Core Strategy Single Issue Review (CS SIR)	51	152	57	21	74
CS SIR Sustainability Appraisal	9	30	16	7	7
CS SIR Habitat Regulations Screening Assessment	6	35	28	1	6

3.35 All responses were entered onto a database and were made available to view online at <http://westsuffolk.jdi-consult.net/localplan/readdoc.php?docid=193>

### Summary of main issues raised

3.36 The main issues to arise from the consultation are set out below:

- Overall housing number (6800) should be higher/lower
- Need for more affordable homes
- Objections to levels of growth proposed in Newmarket
- Concern over lack of inclusion of RAF Mildenhall for housing
- Objections to low levels of growth in Brandon
- Objections to levels of growth in key service centres and primary villages
- Concern that highways information has not been updated
- Comments that small scale infill should be allowed in smaller settlements

### How these issues have been addressed

3.37 A summary of how the Core Strategy submission document addresses the issues raised is included at Annex I.

### Consultation responses – Site Allocation Local Plan Preferred Options

3.38 In total 418 representations were received to the Site Allocations Local Plan Preferred Options consultation from 87 respondents in the form of website, email and paper responses.

<b>April – July 2016</b>					
<b>Site Allocations Local Plan Preferred Options</b>					
<b>Document</b>	<b>Number of respondents</b>	<b>Total representations received</b>	<b>Object</b>	<b>Support</b>	<b>Comment</b>
Site Allocations Local Plan (SALP)	87	418	108	60	250
SALP Sustainability Appraisal	8	23	12	3	8
SALP Habitat Regulations Screening Assessment	6	20	15	1	4

3.39 All responses were entered onto the public consultation website and are available to view online at <http://westsuffolk.jdi-consult.net/localplan/readdoc.php?docid=195>

### Summary of main issues raised

3.40 A summary of the main issues to arise from the consultation are set out below:

- Sites should be included in secondary villages where development is sustainable
- Air traffic noise emissions and flight paths from the air bases should be taken into account when allocating sites
- Closure of RAF Mildenhall should be taken into account
- The water framework directive and flood zones should be taken into account in site selection
- It is unclear what level of housing the SALP will meet. A housing trajectory should be included
- Concern about low level of housing proposed in Brandon
- Concern about highways capacity in Mildenhall
- Concern about the timing and delivery of sites
- Not enough consideration has been given to the movement of horses and traffic through Newmarket
- Lakenheath's classification as a Key Service Centre should be removed
- The recommendations in the Suffolk Wildlife Trust audits should be referenced
- Natural England recommendations to include further detail around developer contributions to protect sites

### **How these issues have been addressed**

- 3.41 A summary of how the Site Allocations Local Plan submission document addresses the issues raised is included at Annex J

#### **4. Regulation 20: Core Strategy Single Issue Review and Site Allocations Local Plan Proposed Submission**

4.1 A six week Regulation 19 consultation on the Proposed Submission Core Strategy Single Issue Review (CS SIR) and Proposed Submission Site Allocations Local Plan (SALP) commenced on 10 January 2017. This period of consultation was extended to the 13 March to allow consultees a full six weeks to consider an Erratum to the Sustainability Appraisal for the Site Allocations Local Plan which became available during the consultation period. Consultation on the Habitats Regulations Screening Assessments was extended to the 21 March 2017 to allow additional time for consideration of a supporting air quality assessment, regarding the Breckland SAC and the Breckland SPA, which became available during the consultation period.

##### **Who was consulted**

4.2 The Council maintains a database of contacts which accords with the list of consultees listed in the adopted Statement of Community Involvement (SCI). The list of statutory consultees and specific consultation bodies who were written to is contained in Annex A.

##### **How they were consulted**

4.3 At this final publication stage we asked respondents to indicate clearly which policy or paragraph of the document they were commenting on and whether they thought that the part of the document they were commenting on was legally compliant, positively prepared, justified, effective or consistent with national policy in line with the requisite tests.

4.4 The consultation undertaken on the Forest Heath Proposed Submission Site Allocations Local Plan and Proposed Submission Core Strategy Single Issue Review documents followed the requirements of the Council's adopted Statement of Community Involvement (SCI) (2014).

4.5 Letters were sent to all contacts registered on the Local Plan database informing them of the Proposed Submission consultation. Individuals are also given the opportunity to have their name put on the Council's database to be notified of consultations at each stage of the Local Plan process. The letters and accompanying leaflet sent to notify people about the consultation are attached at Annexes K, L and M.

4.6 Consultation comments were invited by:

- Holding drop in events in the districts towns and key service centres in Newmarket, Brandon, Mildenhall, Red Lodge and Lakenheath
- Writing to all contacts on the council's Local Plan database
- Writing to all relevant specific and general consultation bodies
- Writing to those bodies prescribed by the duty to co-operate
- Promoting the consultation and drop in events through the council's Twitter and Facebook accounts

- Writing to all Parish Clerks on 22 December 2016 to inform of consultation and give early notification of drop in events
- Press advert promoting the consultation and drop in events in the Newmarket Journal and Bury Free Press 5/6 January 2017 (Annex M)

4.7 The attendance and key issues raised at the five drop in events was varied. The issues raised at each event are listed in Annex N.

#### **Regulation 19 consultation events January/February 2017**

<b>Location</b>	<b>Date/Time</b>	<b>Approximate number of attendees</b>
Mildenhall	Tuesday 17 January 4-7pm	25
Lakenheath	Thursday 26 January 4-7pm	18
Newmarket	Monday 30 January 4-7pm	29
Red Lodge	Thursday 2 February 4-7pm	8
Brandon	Thursday 9 February 4-7pm	19

#### **Availability of documents**

4.8 The submission consultation stage of the Single Issue Review of Core Strategy Policy CS7 and Site Allocations Local Plan documents comprised:

- Proposed Submission Core Strategy Single Issue Review of Policy CS7 (January 2017)
- Sustainability Appraisal of Proposed Submission Core Strategy Single Issue Review of Policy CS7 (January 2017)
- Habitat Regulations (Screening) Assessment of Proposed Submission Core Strategy Single Issue Review of Policy CS7 (January 2017)
- Proposed Submission Site Allocations Local Plan (January 2017)
- Sustainability Appraisal of Proposed Submission Site Allocations Local Plan (January 2017)
- Sustainability Erratum of Proposed Submission Site Allocations Local Plan (January 2017)
- Habitat Regulations (Screening) Assessment of Proposed Submission Site Allocations Local Plan (January 2017)
- Air quality Assessment regarding the Breckland SAC and Breckland SPA (February 2017)

4.9 Hard copies of all consultation documents were placed in the deposit points in accordance with West Suffolk Councils' adopted Statement of Community Involvement at:

- Forest Heath District Council Offices, College Heath Road, Mildenhall, Suffolk, IP28 7EY
- Newmarket Customer Information, 63 The Guineas, Newmarket, Suffolk CB8 8HT
- Brandon Library, The Brandon Centre, Bury Road, Brandon, IP27 0BQ
- West Suffolk House, Western Way, Bury St Edmunds, Suffolk IP33 3YU

### **Representations to the Proposed Submission Single Issue Review of Core Strategy Policy CS7**

4.10 A total of 29 individuals responded to the Proposed Submission Core Strategy Single Issue Review. This amounted to 42 separate representations. All of the representations received were entered onto the consultation database and were made available to view online at <http://westsuffolk.jdi-consult.net/localplan/readdoc.php?docid=199>

<b>January – March 2017 Proposed Submission Single Issue Review of Core Strategy Policy CS7</b>					
<b>Document</b>	<b>Number of respondents</b>	<b>Total representations received</b>	<b>Object</b>	<b>Support</b>	<b>Comment</b>
Submission Core Strategy Single Issue Review (CS SIR)	30	43	32	11	0
CS SIR Sustainability Appraisal	6	6	2	0	4
CS SIR Habitat Regulations Screening Assessment	3	3	0	0	3

4.11 The main objections to arise from the Proposed Submission Single Issue Review of Core Strategy Policy CS7 consultation are set out in Annex O.

## Representations to the Proposed Submission Site Allocations Local Plan

4.12 A total of 88 individuals responded to the Proposed Submission Site Allocations Local Plan. This amounted to 228 separate representations. All of the representations received were entered onto the consultation database and were made available to view online at <http://westsuffolk.jdi-consult.net/localplan/readdoc.php?docid=200>

<b>January – March 2017 Proposed Submission Site Allocations Local Plan</b>					
<b>Document</b>	<b>Number of respondents</b>	<b>Total representations received</b>	<b>Object</b>	<b>Support</b>	<b>Comment</b>
Site Allocations Local Plan (SALP)	89	228	180	49	0
SALP Sustainability Appraisal	8	9	0	0	9
SALP Sustainability Appraisal Erratum	1	0	0	0	1
SALP Habitat Regulations Screening Assessment	3	2	0	0	3
Policies Map Book	11	11	9	0	2

4.13 The main objections from the Proposed Submission Site Allocations Local Plan consultation are set out in Annex P.



## **5. Conclusions**

- 5.1 This statement of engagement and consultation records engagement with the community during the preparation and consultation of the council's Issues and Options and Preferred Options Single Issue Review of Core Strategy Policy CS7 and Site Allocations Local Plan (Regulation 18) and the Proposed Submission Single Issue Review of Core Strategy Policy CS7 and Proposed Submission Site Allocations Local Plan (Regulation 19) in accordance with the regulations and the council's adopted SCI.
  
- 5.2 It is considered that the consultations conform to the requirements of the 2004 Regulations and the 2012 Amended Regulations and the Joint Statement of Community Involvement (2014). More importantly, the consultation has provided real benefits to the evolution of the district's Local Plan.

**Organisations and persons invited to make representations under Regulation 18**

National Grid  
Suffolk Wildlife Trust  
The Showman's Guild of Great Britain  
Suffolk County Council  
UK Power Networks  
Suffolk Preservation Society  
Abellio Greater Anglia  
Natural England  
West Suffolk Clinical Commissioning Group  
Suffolk County Council  
Department for Work and Pensions  
Sustrans  
The Theatres Trust  
Historic England  
NHS Property Services Ltd  
Highways England  
The Crown Estate  
NTL UK  
RSPB – Eastern England  
GeoSuffolk  
West Suffolk Councils  
Forestry Commission England  
Network Rail  
Ministry of Justice  
The Coal Authority  
AMEC Environment & Infrastructure UK Limited  
Suffolk Fire and Rescue Service  
Traveller Law Reform Project  
Anglian Water  
Three  
Cambridgeshire County Council  
Barley Homes (Group) Ltd  
Openreach BT  
Department for Transport  
Sport England (East)  
British Gas  
Society for the Protection of Ancient Buildings  
Department of Health  
O2 UK  
Health and Safety Executive  
East Cambridgeshire District Council  
Orange Personal Communication Services  
West Suffolk Hospital  
New Anglia Local Enterprise Partnership  
Homes and Communities Agency  
Environment Agency  
Suffolk Constabulary

The National Trust  
Hutchison 3GUK Limited  
Vodafone and O2  
Suffolk Biodiversity Partnership  
The Council for British Archaeology for East Anglia  
Department for Media, Culture and Sport  
The Council for British Archaeology  
Transport Focus  
Department for Environment, Food and Rural Affairs  
National Grid Property Ltd  
Ely Group of Internal Drainage Boards  
Department for Innovation, Business and Skills  
Greater Cambridge Greater Peterborough Enterprise Partnership  
Babergh District Council and Mid Suffolk District Council  
EE

### **Forest Heath Parish Councils**

Mildenhall Parish Council  
Lakenheath Parish Council  
Barton Mills Parish Council  
Moulton Parish Council  
Santon Downham Parish Council  
Kentford Parish Council  
Newmarket Town Council  
Red Lodge Parish Council  
Herringswell Parish Council  
Icklingham Parish Council  
Beck Row, Holywell Row & Kenny Hill Parish Council  
Freckenham Parish Council  
Elveden Parish Council  
Gazeley Parish Council  
Worlington Parish Council  
Higham Parish Council  
Eriswell Parish Council  
Tuddenham St Mary Parish Council  
Cavenham Parish Council  
Exning Parish Council  
Brandon Town Council  
Dalham Parish Council

### **Adjoining Parish Councils and Councils**

Chippenham Parish Council  
Ashley Parish Council  
Thetford Town Council  
Littleport Parish Council  
Essex County Council  
Breckland District Council  
Isleham Parish Council  
Kings Lynn and West Norfolk Borough Council  
Cambridgeshire County Council  
Soham Town Council  
Risby Parish Council

Ousden Parish Council  
Lynford Parish Meeting  
East Cambridgeshire District Council  
South Cambridgeshire District Council  
Burwell Parish Council  
Fordham Parish Council  
Culford, Wordwell & West Stow Parish Council  
Stetchworth Parish Council  
Swaffham Prior Parish Council  
Snailwell Parish Council  
Ely City Council  
Norfolk County Council  
Kennett Parish Council  
Woodditton Parish Council  
Cheveley Parish Council  
Weeting with Broomhill Parish Council  
Hargrave Parish Council  
Lackford parish Council  
Hockwold cum Wilton Parish Council

**Local Plan consultation letter August 2015**

Email: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)  
Telephone: 01284 757368

The Manager  
O2 UK  
260 Bath Road  
Slough  
BerkshireSL1 4DX

Date: as postmark

Dear Sir/Madam

**Forest Heath Local Plan consultations  
Single Issue Review (SIR) of Core Strategy Policy CS7 and  
Site Allocations Local Plan**

I am writing to inform you that we are now consulting, under Regulation 18 of the Town and Country Planning, Local Development, England, 2012 Regulations, on issues and options local plan documents.

The consultation documents and supporting information can be viewed at <http://westsuffolk.jdi-consult.net/localplan/>. We are not sending out paper copies for purposes of cost, but if you decide that you require any in paper format we would be please to send them to you. A CD containing all the consultation material is also available on request.

**Consultation documents**

- Single Issue Review (SIR) of Core Strategy Policy CS7 further Issues and Options Regulation 18 stage
- Sustainability Appraisal on Single Issue Review (SIR) of Core Strategy Policy CS7 further Issues and Options Regulation 18 stage
- Habitat Regulations Assessment on Single Issue Review (SIR) of Core Strategy Policy CS7 further Issues and Options Regulation 18 stage
- Site Allocations Local Plan further Issues and Options document
- Sustainability Appraisal on Site Allocations Local Plan further Issues and Options document

- Habitats Regulations Assessment on Site Allocations Local Plan further Issues and Options document
- Draft Infrastructure Delivery Plan supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan

**The consultation period on these documents runs from Tuesday 11 August (9am) – Tuesday 6 October (5pm) 2015.**

**Responses received after this date will not be accepted.**

### **How to view the documents**

All of these documents are available on the council's online planning consultation system at <http://westsuffolk.jdi-consult.net/localplan/> (This is the best place to view the documents and to submit your comments.)

They will also be available for viewing on the council's website at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan)

In addition, hard copies of the documents will also be available to view in:

- Forest Heath District Council Offices, College Heath Road, Mildenhall, Suffolk, IP28 7EY
- Newmarket Customer Information, 63 The Guineas, Newmarket, Suffolk CB8 8HT
- Brandon Library, The Brandon Centre, Bury Road, Brandon, IP27 0BQ

### **Consultation Events**

We will be running a number of consultation events during the consultation period where Planning Officers will be available to talk to about the Forest Heath Local Plan documents and the process for responding to them. The enclosed flyer gives details of the dates, times and locations of these events.

### **How to respond to the documents**

We recommend that you use the online planning consultation, where interactive documents can be found. Instructions on how to make comments are provided on the website. This method of responding to the documents helps us to handle your representation quickly and efficiently and everyone will be able to view all comments made on the document.

**As a statutory consultee you are registered on the online planning consultation system. If you have not used the system before (or have forgotten your login details) please contact us on 01284 757368 and we will provide you with your password and/or username. Please do not re-register on the system.**

Please be aware that any representations made on these documents will be available for everyone to view, regardless of whether they are submitted by post or online.

The system provides a number of benefits if you register and respond online.

- You can enter your comments as you read through the document by using the electronic links. Your comments then directly relate to a specific section of the document.
- You will be able to view other people's comments after consultation closes and we have accepted them.
- You will be able to update your own personal details.
- It is cheaper and quicker.

Although we would prefer you to use the online system, comments made by email or letter will still be accepted. These will be summarised and entered into the online system so that other people can see it and it can be included in reports. If you wish to submit your representations in this way, we recommend you use our response forms as it helps us enter your responses accurately. Forms can be downloaded from [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan).

**Completed forms should be returned by no later than 5pm on Tuesday 6 October 2015 to:**

By email to: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

or by post to: Forest Heath District Council, Strategic Planning Team, West Suffolk House, Western Way, Bury St Edmunds IP33 3YU

**Planning regulations concerning the preparation of Local Plans means that we are unable to accept responses received after this deadline.**

The responses to this consultation will help inform further consultation documents. The next round of consultation is programmed to take place in early 2016.

Following this, a final draft of the documents will be prepared, which the Council will submit to the Secretary of State for an independent planning examination. This final draft will be known as the Submission Document and when it is published in 2016 there will be another and final opportunity for the public and stakeholders to comment.

If you need any further information, please feel free to contact the Strategic Planning team on 01284 757368 or [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

Yours sincerely



Marie Smith - Service Manager (Strategic Planning)

## Local Plan consultation poster August 2015

# Your homes, your jobs, your future...



**Forest Heath  
District Council**

Local Plan consultation  
11 August – 6 October 2015



How would you like Forest Heath to look and function in the future?

How many homes should be built?

Where should we find room for housing, employment, community and leisure facilities?

**Have your say**  
Find out more at any of our consultation events:

**Friday 4 September, 4pm – 7pm**  
Brandon Library, within the Brandon Centre, Bury Road, Brandon

**Monday 7 September, 4pm – 7pm**  
Peace Memorial Hall, High Street, Lakenheath

**Wednesday 9 September, 4pm – 7pm**  
Forest Heath District Council's offices, College Heath Road, Mildenhall

**Thursday 10 September, 10am – 1pm**  
Brandon market

**Tuesday 15 September, 4pm – 7pm**  
The Severals Sports Pavilion, Bury Road, Newmarket

**Wednesday 16 September, 4pm – 7pm**  
Red Lodge Sports Club & Pavilion, Hundred Acre Way, Red Lodge

**Friday 18 September, 10am – 1pm**  
Mildenhall market

**Saturday 19 September, 10am – 1pm**  
Newmarket market




You can comment:

Online: <http://westsuffolk.jdi-consult.net/localplan/>  
By email: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)  
By telephone: Strategic Planning Team, 01284 757368  
In writing: Strategic Planning Team, Forest Heath District Council, West Suffolk House, Western Way, Bury St Edmunds, IP33 3YU






**Core Strategy Single Issue Review Issues and Options (2015): Summary of key issues raised during the 2015 Issues and Options consultation**

All of the representations received in relation to the Core Strategy Single Issue Review issues and options document, and the officer comments made in response to these representations, are available to read online at:

<https://democracy.westsuffolk.gov.uk/documents/s12645/LOP.FH.16.004%20Working%20Paper%201%20-%20Forest%20Heath%20Core%20Strategy%20Policy%20CS7%20Single%20Issue%20Review%20-%20Issues%20a.pdf>

The council’s assessment and action detail where changes have been made to the Core Strategy preferred options document as a result of the representations received. Set out below are details of how the key issues raised during the consultation period have been dealt with and the significant changes which have been made to the document.

<b>Summary of key issues</b>	<b>Council’s assessment</b>
<p>The housing target cannot be determined until the closure of Mildenhall airbase has been taken into consideration</p>	<p>The SHMA which assesses the objectively assessed housing need has been updated in 2016 taking into account the planned withdrawal of USAFE from the Mildenhall base and location of additional personnel at RAF Lakenheath. This along with other evidence will inform the setting of the housing provision target.</p> <p>It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.</p>
<p>Lack of reference to affordable homes viability work in the Issues and Options document</p>	<p>Peter Brett Associates were appointed by the council to undertake an assessment of market signals in relation to the</p>

<b>Summary of key issues</b>	<b>Council's assessment</b>
	<p>OAN and affordable housing need in January 2016. This advises that the target of 30% affordable housing is still deliverable. The technical paper which supports the SIR (2015) give a detailed account of likely delivery of affordable housing in the district over the plan period, having regard to 100% affordable schemes.</p>
<p>It is not clear why the council considers there are only two realistic options for housing quantum</p>	<p>Four housing growth target options were considered in developing the further issues and options SIR. This would be considered a reasonable number to assess through the local plan consultation, the SA and HRA. In developing the preferred option the council took account of the SA, HRA, SHLAA, SHMA, consultation responses and other relevant considerations which have led to setting of an appropriate housing target.</p>
<p>The higher growth option of 7700 homes should be brought forward</p>	<p>The higher growth option of 7700 homes previously consulted on would have been difficult to deliver due to significant environmental constraint, this was listed under cons.</p> <p>The SHMA update 2016 has indicated there is a need to provide a lower provision of 6800 dwellings. This figure will be used to inform the housing provision target for the district.</p>
<p>Higher levels of growth in Brandon should be provided</p>	<p>No further evidence has been presented through the consultation responses to demonstrated that a higher level of growth at Brandon could be delivered with the necessary mitigation to ensure no adverse impact on protected species.</p>
<p>Natural England commented that the Stone Curlew nesting buffer data should be updated</p>	<p>The need to update the stone curlew nesting attempts buffer is noted and will be actioned to help inform decision making on future</p>

<b>Summary of key issues</b>	<b>Council's assessment</b>
Insufficient infrastructure in the towns and rural areas to cope with additional growth	<p>site allocations.</p> <p>The infrastructure requirements for each settlement are set out within the Infrastructure Delivery Plan which accompanies the SIR.</p> <p>There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p>
Traffic congestion issues in Newmarket have not been identified	<p>The Infrastructure and Environmental Capacity study (2009) and the Infrastructure Development Plan which accompanies the SIR consultation document (2015), do not indicate that highways issues are a constraint to any of the growth scenarios proposed in the SIR document. Any local highways mitigation required, to ensure individual sites are acceptable, will be considered through the preparation of the Site Allocations Local Plan working in conjunction with Suffolk County Council Highways and the Highways Agency.</p>
Development around Newmarket has become limited because of concerns over impact on horse racing industry	<p>The environmental and infrastructure capacity of settlements, their position in the settlement hierarchy in Policy CS1 of the Core Strategy, and commitments and completions since the start of the plan period will help determine the overall capacity appropriate for each settlement. Detail on preferred sites is set out in the Site Allocations Local Plan.</p>
Reference to settlement expansion in para 4.11 should be amended to 'expansion of existing settlement boundary'	<p>Agree that the paragraph could be better worded and amended in the preferred options draft</p>
Secondary villages and smaller settlements should not be ruled out for development	<p>Small scale infill development can take place within the settlement boundary of secondary villages</p>

<b>Summary of key issues</b>	<b>Council's assessment</b>
	and small settlements without the need for a formal site allocation.
Various comments made in relation to the benefits and dis-benefits of the four distribution options	<p>There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy, as well as the infrastructure and environmental constraints within each settlement.</p> <p>Taking into account consultation comments, and other evidence based work, an available, realistic and deliverable preferred and alternative option have been developed for the next SIR consultation.</p>
The use of the words high/medium/low to describe the distribution options could be misinterpreted	The presentation of the distribution options will differ in the next consultation draft and will define actual housing numbers rather than low/medium/high growth levels.

### Site Allocations Local Plan Issues and Options (2015): Summary of key issues raised during the 2015 Issues and Options consultation

All of the representations received in relation to the Site Allocations Local Plan issues and options document, and the officer comments made in response to these representations, are available to read online below. See this document for detailed responses to individual sites:

<https://democracy.westsuffolk.gov.uk/documents/s12646/LOP.FH.16.004%20Working%20Paper%202%20-%20Forest%20Heath%20Site%20Allocations%20Local%20Plan%20-%20Further%20Issues%20and%20Option.pdf>

The council's assessment and action detail where changes have been made to the Site Allocations preferred options document as a result of the representations received. Set out below are details of how the key issues raised during the consultation period have been dealt with and the significant changes which have been made to the document.

<b>Summary of key issues</b>	<b>Council's assessment</b>
Heritage assets as potential constraints should be identified consistently in the Plan	Advice taken and assets are noted on a site by site basis
RAF Mildenhall should be included as a site in the Plan	It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base in 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Core Strategy Single Issue Review. Should this position change during the plan period, the Council will immediately commence a review of the Local Plan.
Settlement boundaries for the secondary villages should be amended	The settlement boundaries for the Secondary Villages have been reviewed and no revisions are proposed for Elveden, Gazeley, Holywell Row, Icklingham, Moulton, and Tuddenham.

<p>Sites in Lakenheath should be deferred due to uncertainty of RAF/USAF operations</p>	<p>The LPA is working with the MOD and sub region to plan for the impacts of the USAF leaving Mildenhall and further intensification of Lakenheath Base.</p> <p>There are planning applications with resolutions to grant planning permission on sites L/13, L/35, L/26 and L/36. These sites are the subject of proposed Policies L1 and L2.</p>
<p>The level of development proposed for Brandon is not sustainable</p>	<p>Limited growth proposed for Brandon because of environmental constraints.</p>
<p>Mildenhall is capable of absorbing high levels of growth</p>	<p>Policies M1 and M2 in the SALP Preferred Options document propose site allocations for growth in Mildenhall appropriate to its status as a market town in line with Policy CS1.</p>
<p>No development in Mildenhall should be allocated until it has been demonstrated that it will not result in a likely significant effect on internationally important nature conservation sites</p>	<p>HRA Screening undertaken to inform site selection process.</p> <p>None of the sites proposed in Policies M1 and M2 of the SALP Preferred Options document are to the east of the town.</p>
<p>Traffic conditions in Newmarket have not been accurately set out</p>	<p>Infrastructure requirements, including transport and highways are being assessed for the level and locations of growth proposed. Improvements will be linked to the level and timing of development proposed.</p>
<p>Further development in Newmarket will reduce the town's appeal as a centre for race horses</p>	<p>Policy N1 in the SALP Preferred Options document proposes site allocations for growth in Newmarket appropriate to its status as a market town in line with Policy CS1 taking into consideration the constraints including protection of horse racing land.</p>
<p>Lack of appropriate infrastructure in Lakenheath to support growth or the village's status as a KSC</p>	<p>Policies L1 and L2 in the SALP Preferred Options document propose site allocations for growth in Lakenheath appropriate to its status as a Key Service Centre in line with Policy CS1.</p>

<p>Sites L/19; L/22; L/25 and L/27 border part of the Breckland Special Area of Conservation (SAC); RAF Lakenheath SSSI and Maids Cross Hill SSSI and Local Nature Reserve (LNR). It should be ensured that any development allocated at these sites does not result in a likely significant effect on the designated sites, either alone or in combination with other plans or projects.</p>	<p>Response noted – HRA Screening undertaken to inform site selection process. None of these sites (L/15, L/19, L/22, L/25, L/27 and L/28) are considered unsuitable for development for a number of reasons including: MOD noise safeguarding, SPA, SAC, CWS and SSSI, and ecological value.</p>
<p>Red Lodge is not a sustainable option for growth. It relies on the majority of development being placed in one rural location, void of services, infrastructure and employment opportunities.</p>	<p>Red Lodge is a Key Service Centre, and Policies RL1 and RL2 in the SALP Preferred Options document propose site allocations for growth in Red Lodge appropriate to its status as a Key Service Centre in line with Policy CS1.</p> <p>Infrastructure requirements, including transport and highways, water supply and waste water disposal are being assessed for the level and locations of growth proposed. Improvements will be linked to the level and timing of development proposed.</p>
<p>The current drainage network at Red Lodge cannot support any further development in this location as sewerage issues continue to be a problem and have not been satisfactorily resolved despite assurances from AWA.</p>	<p>Infrastructure requirements, including transport and highways, water supply and waste water disposal are being assessed for the level and locations of growth proposed. Improvements will be linked to the level and timing of development proposed.</p>
<p>The SALP and accompanying SA have not tested a high growth option at Exning</p>	<p>Exning is designated a Primary Village in Policy CS1. The SALP Preferred Options document proposes a site allocation for growth in Exning appropriate to its status as a Primary Village in line with Policy CS1. High growth would not be appropriate for this Primary Village, and would be contrary to the settlement hierarchy set out in Policy CS1.</p>

<p>Large scale growth opposed in Kentford</p>	<p>Kentford has accommodated a relatively high amount of growth in recent years, and consequently only sites that already have planning permission are proposed as allocations (K/10 and K/16) in the SALP Preferred Options document.</p>
<p>Growth in West Row is constrained by infrastructure</p>	<p>The SALP Preferred Options document proposes allocating one site in West Row WR/07. Concentrating the bulk of growth on one site will allow the benefits secured from development to be maximised.</p>
<p>There are a number of listed buildings in West Row, all listed at Grade II. Sites WR/01, WR/04, WR/07, WR/15, WR/27 and WR/33 have the potential to affect the significance of specific listed buildings through development within their setting. Further assessment of potential impacts is necessary and any site allocation will need to be justified in terms of its heritage impacts. If sites are taken forward for allocation, appropriate development criteria would need to be set.</p>	<p>It is only proposed to allocate one site in West Row, WR/07. A planning application (DC/14/2047/HYB) for 138 dwellings is currently under consideration. The heritage impacts of development will be fully considered.</p>



**Local Plan preferred options consultation letter April 2016**

Email:

[planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

Telephone: 01284 757368

Date: as postmark

Dear Sir/Madam

**Forest Heath Local Plan consultations  
Single Issue Review (SIR) of Core Strategy Policy CS7 and Site  
Allocations Local Plan Preferred Options consultation 4 April – 8 June  
2016**

I am writing to inform you that we are now consulting, under Regulation 18 of the Town and Country Planning, Local Development, England, 2012 Regulations, on Preferred Options Local Plan documents approved by Forest Heath District Council Cabinet on 1 March 2016.

**You are currently on our database for receiving notification of such consultations. If you no longer wish to receive such communications please let us know and we will remove your contact details.**

**Consultation documents**

The documents which are now being consulted on are:

- Single Issue Review (SIR) of Core Strategy Policy CS7 Preferred Option Regulation 18 Stage;
- Sustainability Appraisal on Single Issue Review (SIR) of Core Strategy Policy CS7 Option Regulation 18 Stage;
- Habitats Regulations Assessment on Single Issue Review (SIR) of Core Strategy Policy CS7 Preferred Option Regulation 18 Stage;
- Site Allocations Local Plan Preferred Options Regulation 18 Stage;
- Sustainability Appraisal on Site Allocations Preferred Options Regulation 18 Stage;
- Habitats Regulations Assessment on Site Allocations Local Plan Preferred Options Regulation 18 Stage;
- draft Infrastructure Delivery Plan supporting the SIR of Core Strategy Policy CS7 and Site Allocations Local Plan.

**The consultation period on these documents runs from Monday 4 April (9am) – Wednesday 8 June (5pm) 2016.**

**Representations received after this date will not be accepted.**

### **How to view the documents**

All of these documents are available on the council's online planning consultation system at <http://westsuffolk.jdi-consult.net/localplan/> (This is the best place to view the documents and to submit your comments.)

They will also be available for viewing on the council's website at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan)

In addition, hard copies of the documents will also be available to view in:

- Forest Heath District Council, College Heath Road, Mildenhall IP28 7EY;
- Newmarket Customer Information, 63 The Guineas, Newmarket CB8 8HT;
- Brandon Library, The Brandon Centre, Bury Road, Brandon IP27 0BQ.

The documents are also available on CD by request.

Paper response forms will also be available in all deposit points above.

### **Consultation Events**

We will be running a number of consultation events during the consultation period where you will be able to talk to officers about the Forest Heath Local Plan document, and the process for responding to them. Please see the attached leaflet for further details of the dates/times and locations of these events.

### **How to respond to the documents**

We recommend that you use the online planning consultation, where interactive documents can be found. Instructions on how to make comments are provided on the website. This method of responding to the documents helps us to handle your representation quickly and efficiently and everyone will be able to view all comments made on the document.

**You are already registered on the planning consultation system database. If you not used this system to submit responses before and would like to but have forgotten your password and/or username please contact us on 01284 757368 for your details. Please do not re-register on the system again.**

Please be aware that any representations made on these documents will be available for everyone to view, regardless of whether they are submitted by post or online.

Where there are groups who share a common view on an issue in the documents, it would help if that group could send in a single response indicating how many people it is representing and how the response has been authorised.

The system provides a number of benefits if you respond online.

- You can enter your comments as you read through the document by using the electronic links. Your comments then directly relate to a specific section of the document;
- You will be able to view other people's comments after consultation closes and we have accepted them;
- You will be automatically notified when new documents are available for consultation;
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- It is cheaper and quicker.

Although we would prefer you to use the online system, comments made by email or letter will still be accepted. These will be summarised and entered into the online system so that other people can see them and they can be included in reports. If you wish to submit your representations in this way, we recommend you use our response forms as it helps us enter your responses accurately. Forms can be downloaded from [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan).

**Completed forms should be returned by no later than 5pm on Wednesday 8 June 2016:**

By email to: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk) or by post to Forest Heath District Council, Strategic Planning Team, West Suffolk House, Western Way, Bury St Edmunds, IP33 3YU

**Planning regulations concerning the preparation of Local Plans means that we are unable to accept responses received after this deadline.**

Following this consultation, a final draft of the documents will be prepared, which the council will submit to the Secretary of State for an independent planning examination. This final draft will be known as the Submission Document and when it is published in 2016 there will be another and final opportunity for the public and stakeholders to comment.

If you need any further information, please feel free to contact the Strategic Planning team on 01284 757368 or [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

Yours faithfully



Marie Smith  
Service Manager (Strategic Planning)

**Local Plan preferred options consultation extension letter**

**Our reference**

**Contact** Ann-Marie Howell

**Direct Dial** 01284 757368

**Email**

planning.policy@westsuffolk.gov.uk

Date: 20 May 2016

Dear Sir/Madam

**Extension of Local Plan consultation period to Friday 1 July 2016 – Forest Heath Single Issue Review (SIR) of Core Strategy Policy CS7 and Site Allocations Local Plan**

I am writing to inform you that the current Local Plan consultation period, due to close on 8 June 2016, is being extended until 5pm on 1 July 2016.

This extension is to allow consultees adequate time to consider the recently completed update of the 2009 Forest Heath Transport Technical Note prior to commenting on the draft Local Plan documents.

This Technical Note forms part of the council's evidence base to support the Local Plan. It is an early stage in the process of identifying potential transport impacts of the emerging proposals for the broad locations of housing provision as part of the development of the Forest Heath Local Plan. It does not include solutions to the impacts, which will form part of a further study currently being commissioned, which will accompany the final submission Plans for consultation this autumn.

The Forest Heath Transport Technical Note (dated 10 May 2016) can be seen at the following link on the council's Local Plan evidence pages [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence)

**How to respond to the Local Plan documents**

As a reminder, all of the Local Plan consultation documents and supporting information can be viewed on the council's planning consultation system at <http://westsuffolk.jdi-consult.net/localplan/>

We recommend that you use the online planning consultation, where interactive documents can be found. Instructions on how to make comments are provided on the website. This method of responding to the documents helps us to handle your representation quickly and efficiently and everyone will be able to view all comments made on the document.

Please be aware that any representations made on these documents will be available for everyone to view, regardless of whether they are submitted by post or online.

Although we would prefer you to use the online system, comments made by email or letter will still be accepted. These will be summarised and entered into the online system so that other people can see them and they can be included in reports. If you wish to submit your representations in this way, we recommend you use our response forms as it helps us enter your responses accurately. Forms can be downloaded from [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan).

**Completed forms should be returned by no later than 5pm on Friday 1 July 2016:**

By email to: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk) or by post to Forest Heath District Council, Strategic Planning Team, West Suffolk House, Western Way, Bury St Edmunds IP33 3YU

**Planning regulations concerning the preparation of Local Plans means that we are unable to accept responses received after this deadline.**

Following this consultation, a final draft of the documents will be prepared, which the council will submit to the Secretary of State for an independent planning examination. This final draft will be known as the Submission Document and when it is published in 2016 there will be another and final opportunity for the public and stakeholders to comment.

If you need any further information, please feel free to contact the Strategic Planning team on 01284 757368 or [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

Yours sincerely

Ann-Marie Howell  
Principal Planning Officer (Strategic Planning)

Local Plan preferred options consultation poster April 2016

# Your homes, your jobs, your future...



Forest Heath  
District Council

## Local Plan Preferred Options consultation 4 April - 8 June 2016

How would you like Forest Heath to look and function in the future?

How many homes should be built?

Where should we find room for housing, employment, community and leisure facilities?

### Have your say

Find out more at any of our consultation events:

- Friday 8 April 4pm - 7pm**  
The Brandon Centre (inside Brandon Library), Bury Road, Brandon
- Tuesday 12 April 4pm - 7pm**  
Forest Heath District Council's offices, College Heath Road, Mildenhall
- Saturday 16 April 10am - 1pm**  
Newmarket Guineas Shopping Centre, Newmarket
- Tuesday 19 April 4pm - 7pm**  
The Kentford Public House, Bury Road, Kentford
- Thursday 21 April 4pm - 7pm**  
Peace Memorial Hall, High Street, Lakenheath
- Tuesday 26 April 4pm - 7pm**  
Red Lodge Sports Pavilion, Hundred Acre Way, Red Lodge
- Thursday 28 April 4pm - 7pm**  
Newmarket Town Council, Memorial Hall, High Street, Newmarket
- Tuesday 3 May 4pm - 7pm**  
West Row Village Hall, Beeches Road, West Row
- Thursday 12 May 10am - 1pm**  
Brandon Market
- Wednesday 18 May 4pm - 7pm**  
Exning Community Church Hall, Church Lane, Exning
- Friday 20 May 10am - 1pm**  
Mildenhall Market
- Tuesday 24 May 4pm - 7pm**  
Beck Row Community Centre (next to Beck Row Primary School, Lambie Close), Beck Row

You can comment:

Online: <http://westsuffolk.gov.uk/consult/localplan>  
By email: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)  
By telephone: Strategic Planning Team, 01284 757368  
In writing: Strategic Planning Team, Forest Heath District Council, West Suffolk House, Western Way, Bury St Edmunds, IP33 3YU



**Summary of key issues raised during the 2016 Core Strategy Preferred Options consultation and how the submission document addresses these issues**

All of the representations received in relation to the Core Strategy Single Issue Review preferred option document, and the officer comments made in response to these representations, are available to read online at:

<https://democracy.westsuffolk.gov.uk/documents/s16831/LOP.FH.16.011%20Working%20Paper%201%20-%20Summary%20of%20Responses%20-%20Forest%20Heath%20Core%20Strategy%20Single%20Issue%20Review.pdf>

The council’s assessment and action detail where changes have been made to the Core Strategy submission document as a result of the representations received. Set out below are details of how the key issues raised during the consultation period have been dealt with and the significant changes which have been made to the document.

<b>Key issues</b>	<b>Change to Plan</b>
Overall housing number (6800) should be higher/lower	No change. The housing requirement is based on the evidence available in the SHMA update 2016
Need for more affordable homes	No change. The need for affordable homes is addressed in the evidence to support the overall need of providing 6800 homes in the plan period
Objections to levels of growth proposed in Newmarket	Hatchfield Farm to the north east of Newmarket has been removed (400 homes) from the housing distribution for Newmarket as no evidence of deliverability following the August 2016 SoS decision to refuse planning permission.
Concern over lack of inclusion of RAF Mildenhall for housing	Paragraph inserted in the SIR to clarify the site is not available in this plan period.
Objections to low levels of growth in Brandon	No further evidence has been presented through the 2016 preferred options consultation to demonstrate that a higher level of growth at Brandon could be delivered with the necessary mitigation to ensure no adverse impact on protected species. Natural England is supportive of the council’s approach to this in

<b>Key issues</b>	<b>Change to Plan</b>
	the Local Plan.
Objections to levels of growth in key service centres and primary villages	<p>The additional provision in the SIR has been amended to take into account the latest information on availability and deliverability of sites.</p> <p>There is a balance to be achieved in deciding on a distribution to meet the overall district housing need in accordance with the settlement hierarchy in Policy CS1 of the Core Strategy, as well as the infrastructure and environmental constraints within each settlement.</p>
Concern that highways information has not been updated	New paragraph 3.6 updates the evidence base to support the SiR. An updated AECOM Traffic study demonstrates that the distribution in the SIR can be achieved with highways mitigation and sustainable transport measures.
Comments that small scale infill should be allowed in smaller settlements	No change. Policies in the 2015 Joint Development Management document allow small scale infill development to take place within the settlement boundary of secondary villages and small settlements



### Summary of the key issues raised during the 2016 Site Allocations Local Plan Preferred Options consultation and the submission document addresses these issues

All of the representations received in relation to the Site Allocations Local Plan preferred options document, and the officer comments made in response to these representations, are available to read online at the link below. See this document for detailed responses to individual sites:

<https://democracy.westsuffolk.gov.uk/documents/s16832/LOP.FH.16.011%20Working%20Paper%202%20-%20Summary%20of%20Responses%20-%20Site%20Allocations%20Local%20Plan%20SALP%20-%20ELECTRON.pdf>

The council's assessment and action detail where changes have been made to the Site Allocations submission document as a result of the representations received. Set out below are details of how the key issues raised during the consultation period have been dealt with and the significant changes which have been made to the document.

<b>Key issues</b>	<b>Change to Plan</b>
Sites should be included in secondary villages where development is sustainable.	No change. CS1 states Secondary villages will provide nominal growth where local capacity allows and that no urban expansion will be considered.
Air traffic noise emissions and flight paths from the air bases should be taken into account when allocating sites.	Noise contour map included in plan and need for appropriate noise mitigation measures included in policy where necessary.
Closure of RAF Mildenhall should be taken into account.	Text included in para 4.8 to explain that as the base will not be vacant until 2023 and the likely remediation issues it cannot be considered available and deliverable in this plan period.
The water framework directive and flood zones should be taken into account in site selection.	An updated Water Cycle Study has been prepared in liaison with the EA and Anglia Water Services and used as an evidence base to inform site selection. Supporting text has been added where necessary.
It is unclear what level of housing the SALP will meet. A housing trajectory should be included.	A paragraph and table on housing need is included in section 2 of submission draft of SALP and a housing trajectory in the appendices.

<b>Key issues</b>	<b>Change to Plan</b>
<b>Brandon</b>	
Concern about low level of housing proposed in Brandon.	No change. Higher growth in Brandon can only be considered if there are no adverse effects on the SPA or where adverse effects can be mitigated.
The proposed cemetery has been identified as an area with a habitat that might support a range of protected and priority species.	Wording included in policy SA3 to ensure if the current permission is not implemented or varied proposals should have regard to protect species.
<b>Mildenhall</b>	
Land promoted to the west of Fred Dannatt Road for employment uses	No change. Policy S4 is a mixed use site to include at least 5ha employment
Wording within Wildlife Audit reports should be included within policy	Text added to supporting text at para 4.7 and policy S4(a)
<b>SA4(a) Land west of Mildenhall</b> - Development will need to have regard to known archaeological interest and the setting of a listed building Wamil Hall.	Wording to policy SA4(a) amended to reflect the concerns raised.
Concern about highways capacity in Mildenhall.	No change. An updated 2016 AECOM Traffic Study demonstrates that the allocations in the SALP can be achieved with highways mitigation and sustainable transport measures.
<b>M2(a) 54 Kingsway</b> - Wish to have property removed from the allocation.	56 Kingsway removed from the allocation and the area to the south added to enable access from Robin Close.
Concern about the timing and delivery of sites.	Housing trajectory and table included in appendix 2 of the submission SALP
<b>Site M/30 The old Railway Station</b> should be allocated and the settlement boundary redrawn to include this site and those recently permitted along Worlington Road.	No change. The site is detached from the existing settlement boundary and there are potential coalescence issues with Barton Mills.

<b>Key issues</b>	<b>Change to Plan</b>
The settlement boundary should be amended to include RAF Mildenhall.	No change. The base will not be vacant until 2023 and likely remediation issues it cannot be considered available and deliverable in this plan period.
Suggested boundary changes to include land south of Worlington Road and land abutting the southern boundary of the town.	No change. These sites are either remote from the existing settlement boundary, within flood zone 3 or adjacent to the SPA.
<b>Newmarket</b>	
Not enough consideration has been given to the movement of horses and traffic through the town.	No change. AECOM have undertaken a study of the cumulative transportation impacts of the proposed sites. SCC Highways will continue to have regular meetings with the HRI regarding horse walks and crossings.
New sites submitted in Studlands Park	No change. Sites assessed and considered not suitable for development as public open space with a community, amenity and recreation function.
<b>SA6(a) Brickfield Stud</b> - Objection to inclusion of site as in horse racing use.	No Change. Policy DM 49 allows HRI uses to be considered for allocation. Balance to be made to meet housing need against constraints in each settlement.
<b>SA6(b) Land at Black Bear Lane</b> - Site should be retained in horse racing use and it should not be allocated until uses are determined.	As SA6(a) above. The allocation requires a development brief to be approved prior to determination of any application. HRI uses have not been ruled out on the site.
<b>SA6(b) Land at Black Bear Lane</b> - The boundary of the site should be extended to include the adjacent former swimming pool site and White Lion PH.	Site boundary amended to include adjacent sites to allow a comprehensive and coordinate approach to development.
<b>N1(c) Hatchfield Farm</b> - Objections to the inclusion of the site on the basis of potential impact on the horse racing industry.	Removed allocation following SoS decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket.

<b>Key issues</b>	<b>Change to Plan</b>
<p><b>SA6(c) Land at Phillips Close and off Leaders Way / Sefton Way</b> – Leaders Way Sefton Way site area should not be increased. Reference should be made in the text to occupation only by those in the HRI. Concerns about access and traffic. The site should be retained in horse racing use. Development will be detrimental to natural environment. Phillips close site area incorrectly includes 31 Hamilton Road.</p>	<p>Amalgamated sites N1(d) Sefton Way / Leaders Way and N1(f) into one allocation SA6(c) to allow a comprehensive and coordinated approach to development.</p> <p>Added a requirement for a development brief to be prepared before any application is determined.</p> <p>Removed a reference to occupancy condition.</p> <p>Removed of reference to compliance with all other policy requirements. Remove 31 Hamilton Road from site area.</p>
<p><b>SA6(d) St Felix Middle School</b> – The playing fields and other sports facilities should be retained for community use and linked to George Lampton playing field. Consideration should be given to the impact of traffic and horse movements.</p>	<p>No Change. The policy seeks to retain the tennis courts and open space with links to George Lampton Playing Fields.</p> <p>The traffic impact of the proposed residential development is considered to be less than the previous 340 place school use.</p>
<p><b>N/18 George Lampton Playing Fields</b> – The site should be allocated for mixed use development.</p>	<p>No change. The site proved undeliverable in the last plan period and the deliverability in this plan period is uncertain.</p>
<b>Lakenheath</b>	
<p>Lakenheath’s classification as a Key Service Centre should be removed.</p>	<p>No change. Core Strategy policy CS1 establishes the settlement as a KSC. The range of services and facilities remains appropriate to the settlement’s designation.</p>

<b>Key issues</b>	<b>Change to Plan</b>
<p>Infrastructure in the village is not sufficient to support additional growth, particularly highways capacity.</p>	<p>Sites have been allocated in accordance with the settlement's infrastructure and environmental capacity.</p> <p>Highways evidence has confirmed that the sites are deliverable subject to highways mitigation.</p> <p>Wording has been inserted in Policies SA7 and SA8 requiring applicants to demonstrate that cumulative and individual highways impacts can be overcome.</p> <p>Further information will be set out in the IDP which will accompany the consultation document.</p>
<p>Concerns about noise impact from RAF Lakenheath.</p>	<p>Paragraphs inserted in Policies SA7 and SA8 around the need for any development proposals to incorporate appropriate noise mitigation measures.</p> <p>Map of most up to date 2015 noise contours inserted in section 3 of submission SALP.</p>
<p>Consider air traffic noise emissions from RAF Lakenheath and Mildenhall when allocating sites for new housing taking into account the noise contours published by the MOD (which may be updated from time to time) and to engage with the RAF Commanders of RAF Mildenhall and RAF Lakenheath to obtain their input on current flight paths and military activities.</p>	<p>The council will continue to work with the MoD when allocating sites for development in accordance with current safe guarding procedures.</p> <p>Map of most up to date 2015 noise contours inserted in section 3 of submission SALP.</p> <p>Paragraphs inserted in Policies SA7 and SA8 around the need for any development proposals to incorporate appropriate noise mitigation measures.</p>
<p>The recommendations in the Suffolk Wildlife Trust audits should be referenced.</p>	<p>New supporting text at para 4.7 and additional wording inserted to Policy SA8(b) to ensure protection of semi improved grassland.</p>

<b>Key issues</b>	<b>Change to Plan</b>
Natural England recommendations to include further detail around developer contributions to protect sites.	Additional wording added in section 4 of the submission SALP.  'Other agreed measures' inserted into policies SA7 and SA8 (A) to broaden measures to avoid a damaging increase to the SSSI and SPA.
Concerns about the focus of growth to the north of Lakenheath – erodes natural landscape features, under flight path of returning jets to RAF Lakenheath, part within flood zone, accessibility to village.	The northern focus of growth is the least environmentally constrained part of the village and will provide a new primary school.  Sites SA8(a) (b) (c) have resolutions to approve planning permission.  This development area will provide a buffer/green route to help mitigate an increase in visitors to the Maidscross SSSI.
One new site submitted for consideration off Smeeth Drove.	Site deferred as too small for allocation and outside settlement boundary.
<b>Red Lodge</b>	
Natural England recommendations to include further detail around developer contributions to protect sites.	Additional wording added in section 4 of the submission SALP. Insert additional text in policies SA9 & SA10.
The recommendations in the Suffolk Wildlife Trust audits should be referenced.	Inserted new supporting in section 4.
Red Lodge is not ready for further development of this scale until the infrastructure deficits have been addressed and the problems related to the effective removal of sewage from Red Lodge to Tuddenham.	No change - The IDP has identified what infrastructure is required to support growth.  The LPA will continue to work with providers in order to meet future demands at the appropriate time. Anglia Water state that capacity improvements at the receiving Tuddenham Water Recycling Centre means there is capacity for growth.

<b>Key issues</b>	<b>Change to Plan</b>
Proposed growth is not sequential. Development should only be considered within the development boundary with any surplus being directed to the market towns.	Sites have been selected on a sequential basis whilst taking into account the constraints on the settlement as well as the individual constraints of each site.
<b>Site SA9(a) Land off Turnpike Road and Coopers Yard</b> - The site area should be amended to include available land to the south giving access to Turnpike Road.	Amendment made to site boundary to south and west.  Need for a development brief added to ensure comprehensive and coordinated development of the site.
<b>Site RL1(b) Land East of Red Lodge (N)</b> Para 9.16 should be made clear that not all the site lies within the SPA buffer.  Para 21 should be amended to allow general vehicle access between sites.  The site area excludes developable land to the south east and north east.	HRA issues are addressed in the redrafted policy. Para 9.16 is not carried forward in the submission document.  Para 21 does not rule out general vehicle access – no change.  Site area amended to E and W but woodland to SE boundary excluded.
<b>EM1(c) Land East of Newmarket Road</b> is unviable as an employment site and should be allocated for housing.	Text and map amended to include site as a residential allocation to reflect the recent planning permission for 125 dwellings.
<b>Site RL/18 Land South of the Carrops</b> should be allocated as a residential site.	No change. Site deferred as elements of the site liable to flood, it is visually sensitive on the edge of the settlement and has an adjacent 'bad neighbour use' to the east.
<b>Site RL/07 White Star Stables</b> should be allocated as a mixed use site for a HRI and residential site.	No change. Site deferred as within the 1500m Stone Curlew nesting constraint zone. Other locationally preferable sites.

<b>Key issues</b>	<b>Change to Plan</b>
<p><b>RL2(a) Land north of Acorn Way</b> The swale should be relocated to allow an area for the proposed school to expand at a future date if necessary.</p> <p>The existing development boundary and employment uses at Kings Warren should be maintained.</p> <p>Site EM19(c) is a better location for the school.</p>	<p>Removed reference to retention of swale but retain text requiring need for an adequate urban drainage system.</p> <p>No change. The focus of growth on land north of Acorn Way is sustainable. Employment uses are retained on the wider mixed use site.</p> <p>Site EM1(c) benefits from a resolution to approve residential use.</p>
<p>Support from Natural England and others for the settlement boundary changes and removal of the SSSI.</p> <p>Objection that the land south of Green Lane is being removed from the settlement which places an available brownfield site <b>RL/18</b> in the countryside.</p>	<p>No change. The boundary change allows a green wedge to penetrate into the settlement and provides a visual and physical link to the countryside. RL/18 deferred as elements of the site liable to flood, it is visually sensitive on the edge of the settlement and has an adjacent 'bad neighbour use' to the east.</p>
<b>Beck Row</b>	
<p>Policies for all development sites should secure ecological enhancements.</p>	<p>Inserted supporting text in section 4 of the SALP and added reference to sites (a) and (c) in policy SA11.</p>
<p>The land at Stock Corner Farm should be allocated for residential development.</p>	<p>Site deferred as other sequentially preferable sites available and poor location on sharp bend.</p>
<p>The land off Wilde Street should be allocated for residential development.</p>	<p>Site deferred as other sequentially preferable sites available.</p>
<b>Exning</b>	
<p><b>Land North of Lacey's Lane</b> should be allocated for residential development.</p>	<p>Site deferred as other sequentially preferable sites available.</p>
<p><b>SA12(a) Land south of Burwell Road</b> – policy should make references to the need for a cycleway / footway connection to Burwell.</p>	<p>Policy amended to identify the need for a cross boundary cycle route.</p>



<b>Key issues</b>	<b>Change to Plan</b>
<b>SA12(a) Land south of Burwell Road</b> – The site can accommodate a higher number of dwellings.	Site expanded to accommodate a greater number of dwellings at an acceptable density and open space standard.
Amended site <b>E16 Greater Exning</b> is a more sustainable growth option for Exning.	This site is detached from centre of Exning and Newmarket and other sites are sequentially preferable.
Para 11.2 and 11.8 should be updated regarding school expansion.	Supporting text amended to say that "pressure exists on local primary school provision but it is anticipated that that the current school site can be adapted to accommodate further growth."
The settlement boundary should be amended to include <b>site E/03 land to the rear of Laceys Lane.</b>	No change. There are more appropriate sites available to meet the housing need.
<b>Kentford</b>	
Support the inclusion of <b>Site K1(a) Land West of Herringswell Road</b>	This site has been removed from Policy SA13 as development has commenced. The settlement boundary includes this site to reflect the extent of permitted development.
<b>Land at Meddler Stud</b> should be included as an allocation following appeal decision.	This site for 63 dwellings and a racehorse training establishment is included in the submission SALP under Policy SA13(b)
Land between two parts of Kentford does should not be designated a strategic gap.	The land forms a strategic landscape gap marking the River Kennett valley. It also forms a significant physical and historical break between the two distinct parts of the village. The submission SALP maintains this gap as open countryside
Animal Health Trust promoting site <b>K/11</b> for additional homes (south of existing Bloor Homes permission at Lanwades business park).	No change. There is sufficient housing allocated (via permissions/appeals) to meet housing needs to 2031.
New employment site submission for 2.1ha of <b>land off Bury Road</b> for B1, B2, B8 uses ( <b>site K/17</b> )	No change. The site is outside the settlement boundary, would represent ribbon development and lies within the 1500m SPA buffer zone. Site currently subject of a planning application.

<b>Key issues</b>	<b>Change to Plan</b>
<b>West Row</b>	
<b>SA14(a) Land East of Beeches Road</b> – the site could be expanded to reflect the self build housing in the current planning application and the existing field pattern in the north east.	Site area increased to north east and subsequent settlement boundary amendment.
Land south of the 'Gables' Chapel Road should be included in settlement boundary.	No change. Small site, and other sites sequentially preferable.
<b>Economy and Jobs</b>	
Concern about impact of traffic from new allocations on the Horse Racing Industry.	The 5ha employment land allocation at Hatchfield Farm has been removed. In terms of employment land allocations Newmarket has only one, the 1.6ha St Leger site adjacent to the existing industrial estate in the north of the town close to the A14.
Additional site submitted in Bury Road, Kentford	Not included. Site in the countryside, unsustainable location.
Alternative uses suggested for Red Lodge Approach site.	Site EM1(c) not included as an employment allocation (resolution to grant planning permission for the erection of up to 125 dwellings (DC/16/0596/OUT)
Support for 'star' site adjacent to the A11 (and one objection)	Star site not included. Sufficient land allocated in the plan. The council will continue to work with neighbouring authorities to promote infrastructure improvements (A11 – A14 link) and attract investment.
<b>Retail and Town Centres</b>	
Proposed allocation ( <b>policy RE1</b> ) for supermarket on former gas works site, Exning Road, Newmarket. Representations state this site is not needed as supermarket, could be better used e.g. for housing.	No change required. Site remains allocated for retail. The discharge of conditions have been made and the consent is valid. Site allocated for retail policy SA18.
Increasing traffic and pollution becoming serious problem in Mildenhall.	No change required. Town centre master plan will address traffic management and quality of the environment policy SA19.

<b>Key issues</b>	<b>Change to Plan</b>
<b>Gypsies and Travellers and Travelling Showpeople</b>	
Policy G1 is insufficiently precise about scale Gypsy and Traveller provision at each site. Scale provision should be proportionate to size of site. Note the constraints of gas pipeline.	The GTAA 2016 has updated the PO SALP evidence. This has identified no need to allocate permanent G&T pitch provision in the SALP. The proposed PO policy G1 and allocations G1 (a) and G1 (b) have been removed.
Object to proposed Gypsy and Traveller provision on land west Mildenhall on highways grounds, alternative site should be used on land east of 5 ways roundabout.	As above.
Support policy G1.	As above.
Need to undertake Equalities Impact Assessment as part of SA and address EI on Gypsy and Travellers.	Equalities Impact Assessment will be undertaken.
Site submitted in Call for Sites at Beck Row	The GTAA 2016 has updated the previous study upon which the PO SALP was based. This has identified no need to allocate permanent Gypsy and Traveller pitch provision in the SALP.
<b>Settlement Boundary changes</b>	
Moulton settlement boundary should be amended to include the dwellings around the playing field and village green, Brookside and properties on Gazeley Hill and Griffiths Yard and those properties adjoining the boundary behind the street.	No change - The amendments could lead to additional development within the village and an expansion that would not be appropriate or proportionate for a secondary village in line with Policy CS1 of the Core Strategy and the SiR of Policy CS7.
Barton Mills settlement boundary should be further amended to allow limited development (sites proposed)	No change - The council is not putting forward any site options for housing within the secondary villages.
Boundaries of secondary villages should facilitate development that would underpin the provision of new infrastructure and community facilities that would enhance the sustainability of these settlements.	No change - The council is not putting forward any site options for housing within the secondary villages within the SALP, or the SiR. Amendments to the settlement boundaries of secondary villages within the SALP, reflect anomalies in existing boundaries only.

<b>Key issues</b>	<b>Change to Plan</b>
<p>The soundness for setting and amending settlement boundaries is queried before housing numbers and distribution have been established. Settlement boundaries should be flexible and allow sustainable development to come forward.</p>	<p>The principle of settlement boundaries in the Plan area is already established. Any proposals for development within, adjacent, or outside established development boundaries will be assessed on their merits in line with the presumption in favour of sustainable development and all other relevant planning policies.</p>
<p>The settlement boundary of Holywell Row should include land at Laurel Farm</p>	<p>The council is not putting forward any site options for housing within smaller villages.</p>
<p>A minor boundary change should be made in Tuddenham to allow a full ECO house.</p>	<p>No change – The erection of a single dwelling is considered a development management issue.</p>

**Regulation 19 consultation letter and Statement of Representation**

Email:

[planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

Telephone: 01284 757368

Date: as postmark

Dear Sir/Madam

**Forest Heath Local Plan Single Issue Review (SIR) of Core Strategy Policy CS7 and Site Allocations Local Plan (SALP) Submission (Regulation 19 stage) - Consultation 10 January – 21 February 2017**

I am writing to inform you that we are now consulting, under Regulation 19 of the Town and Country Planning, Local Development, England, 2012 Regulations, on Submission Local Plan documents approved by Forest Heath District Council on 21 December 2016.

**You are currently on our database for receiving notification of such consultations. If you no longer wish to receive such communications please let us know and we will remove your contact details.**

**The consultation documents:**

The documents which are now being consulted on are:

- Proposed Submission Single Issue Review (SIR) of Core Strategy Policy CS7 January 2017;
- Proposed Submission Single Issue Review (SIR) of Core Strategy Policy CS7 Sustainability Appraisal January 2017;
- Proposed Submission Single Issue Review (SIR) of Core Strategy Policy CS7 Habitats Regulations Assessment January 2017;
- Proposed Submission Site Allocations Local Plan (SALP) January 2017;
- Proposed Submission Site Allocations Local Plan (SALP) Sustainability Appraisal January 2017;
- Proposed Submission Site Allocations Local Plan (SALP) Habitats Regulations Assessment January 2017;
- Draft Infrastructure Delivery Plan (IDP) supporting the SIR and SALP January 2017

**The consultation period on the documents runs from Tuesday 10 January 2017 (9am) to Tuesday 21 February (5pm) 2017.**

**Planning regulations concerning the preparation of Local Plans mean that we are unable to accept responses received after this deadline. Only comments received on this consultation will be submitted for examination.**

#### **Where to find the information**

- **The consultation documents**, accompanying SAs and HRAs and the IDP;
- **The Statement of Representations procedure** (also attached to this letter);
- **Significant changes** which have been made to the Proposed Submission Single Issue Review (SIR) of Core Strategy Policy CS7 and Site Allocations Local Plan (SALP), since the last consultation in 2016, can be viewed in a supporting document 'Regulation 19 (d) Statement January 2017';
- **Officer responses** to all of the representations received during the last preferred options consultation period;
- **A list of FAQs** to explain some of the planning terms, and to assist you in making your response;
- **The Local Plan evidence base** which supports these consultation documents.

**All of the above information and the documents can be found on the Council's website at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan) and on the public consultation website at <http://westsuffolk.jdi-consult.net/localplan/> (This is the best place to view the documents and to submit your comments.).**

In addition, hard copies of the documents will be available to view in:

- Forest Heath District Council, College Heath Road, Mildenhall IP28 7EY
- Newmarket Customer Information, 63 The Guineas, Newmarket CB8 8HT
- Brandon Library, The Brandon Centre, Bury Road, Brandon, IP27 0BQ
- West Suffolk House, Western Way, Bury St Edmunds IP33 3YU

#### **Consultation Events**

We will be running consultation events during the consultation period where you will be able to talk to officers about the Forest Heath Local Plan document, and the process for responding to them. Please see the attached poster for further details of the dates/times and locations of these events.

## **How to respond to the documents**

We recommend that you use the online planning consultation, where interactive documents can be found. Instructions on how to make comments are provided on the website. This method of responding to the documents helps us to handle your representation quickly and efficiently.

**You are already registered on the planning consultation system database. If you have not used this system to submit responses before and would like to but have forgotten your password and/or username please contact us on 01284 757368 for your details. Please do not re-register on the system.**

Please be aware that any representations made on these documents will be available for everyone to view, regardless of whether they are submitted by post or online.

Where there are groups who share a common view on an issue in the documents, it would help if that group could send in a single response indicating how many people it is representing and how the response has been authorised.

The system provides a number of benefits if you respond online.

- You can enter your comments as you read through the document by using the electronic links. Your comments then directly relate to a specific section of the document;
- You will be able to view other people's comments after consultation closes and we have accepted them;
- You will be automatically notified when new documents are available for consultation;
- You will be able to update your own personal details;
- It is cheaper and quicker.

Although we would prefer you to use the online system, comments made by email or letter will still be accepted. These will be summarised and entered into the online system so that other people can see them and they can be included in reports. If you wish to submit your representations in this way, we recommend you use our response forms as it helps us enter your responses accurately. Forms can be obtained by emailing: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk) or by telephoning the Strategic Planning Team on 01284 757368.

**The consultation closes at 5pm on Tuesday 21 February, and we are unable to accept any comments submitted through the online system, by email, post or delivered by hand after that time.**

Forms may be sent by email to: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk) ; or by post to: Forest Heath District Council, Strategic Planning Team, West Suffolk House, Western Way, Bury St Edmunds IP33 3YU

Following this consultation, it is anticipated that the council will submit the documents in early March 2017 to the Secretary of State for examination by an independent planning inspector.

If you need any further information, please feel free to contact the Strategic Planning team on 01284 757368 or [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

Yours faithfully

A handwritten signature in black ink, appearing to read 'MSmith', with a long horizontal flourish extending to the right.

Marie Smith  
Service Manager (Strategic Planning)



## **Statement of the representations procedure**

### **Forest Heath District Council Proposed Submission Single Issue Review (SIR) of Core Strategy Policy CS7 and Proposed Submission Site Allocations Local Plan (SALP) (Regulation 19 stage) Local Plan Documents**

**This statement has been prepared under Regulation 19 of The Town and Country Planning (Local Development) (England) Regulations 2012.**

#### **Title of the documents:**

- Proposed Submission Single Issue Review (SIR) of Core Strategy Policy CS7 document January 2017
- Proposed Submission Site Allocations Local Plan (SALP) document January 2017

**Subject matter and area covered:** The Forest Heath Local Plan documents set out the overall housing quantum and distribution between settlements and site allocations and general policies against which, (amongst other material considerations), planning applications will be determined across the borough of Forest Heath.

The documents have been produced by Forest Heath District Council following previous issues and options and preferred options stages. The documents have been prepared to give developers and the public up-to-date information on future policies to manage the location of future development.

These documents represent an important stage in the preparation of the Forest Heath Local Plan. The Council has considered the wording of the policies (as previously developed), and has identified the most sustainable way forward, which best meet the needs of both local areas and the strategic policies of the adopted 2010 Core Strategy and the National Planning Policy Framework. The package of policies now put forward as the Proposed Submission Single Issue Review of Core Strategy Policy CS7 and the Site Allocations Local Plan submission documents, provide an opportunity for public consultation, in order to confirm the evidence, or alternatively to provide a basis for any revisions.

The significant stages in the preparation of the Forest Heath Local Plan documents can be summarised as follows:

- August - October 2015 - Consultation in respect of the Issues and Options
- April - July 2016 – Consultation in respect of Preferred Options
- **Current Stage** - Consultation in respect of the Submission Version documents between 10 January 2017 and 21 February 2017

#### **Where the documents can be viewed:**

- Forest Heath District Council, College Heath Road, Mildenhall IP28 7EY
- Newmarket Customer Information, 63 The Guineas, Newmarket CB8 8HT
- Brandon Library, The Brandon Centre, Bury Road, Brandon IP27 0BQ
- West Suffolk House, Western Way, Bury St Edmunds IP33 3YU

**Consultation period for this document:** Representations should be received within the consultation period, which will run from **9am Tuesday 10 January 2017 until 5pm Tuesday 21 February 2017.**

Where possible, representations should be made using the online public consultation software: <http://westsuffolk.jdi-consult.net/localplan/>

Representations can also be sent by email to [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk) or by post to:

Forest Heath District Council  
Strategic Planning Team  
West Suffolk House  
Western Way  
Bury St Edmunds  
IP33 3YU

Any representations received may also indicate a request to be notified of the following events:

- The submission of the Plan for examination by an Independent Inspector;
- The publications of the recommendations of the person who carried out the examination; and
- The adoption of the Plan.

**Forest Heath District Council  
Strategic Planning  
January 2017**

**Publication of Sustainability Erratum: notification of extension to Forest Heath District Council Local Plan Regulation 19 Consultation**

Email: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)  
Telephone: 01284 757368

Date as postmark

Dear Sir/Madam

**Publication of Sustainability Erratum: notification of extension to Forest Heath District Council Local Plan Regulation 19 Consultation**

I am writing to inform you that we are extending the consultation period, under Regulation 19 of the Town and Country Planning, Local Development, England, 2012 Regulations, on Submission Local Plan documents approved by Forest Heath District Council on 21 December 2016.

The reason for the extension is that a supplementary Sustainability Appraisal (SA) Erratum has been produced for the Proposed Submission Site Allocations Local Plan. This Erratum replaces Appendix IV ("Site options appraisal") of the SA Report published alongside the proposed submission version of the Forest Heath Site Allocations Local Plan (SALP) on 10 January 2017. No other parts of the SA Report are affected by this erratum. Equally, no other published documents are affected, including the Council's 'Omission Sites' document (November 2016).

**The consultation period on all of the Local Plan documents now closes on Monday 13 March (5pm) 2017.**

**Planning regulations concerning the preparation of Local Plans mean that we are unable to accept responses received after this deadline.**

The Sustainability Appraisal Erratum can be found on the Council's website (along with the other Local Plan consultation documents) at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan) and on the public consultation website at <http://westsuffolk.jdi-consult.net/localplan/> This is the best place to view the documents and to submit your comments.).

In addition, hard copies of the SA Erratum are available to view in:

- Forest Heath District Council, College Heath Road, Mildenhall IP28 7EY
- Newmarket Customer Information, 63 The Guineas, Newmarket CB8 8HT
- Brandon Library, The Brandon Centre, Bury Road, Brandon, IP27 0BQ
- West Suffolk House, Western Way, Bury St Edmunds IP33 3YU

**How to respond**

We recommend that you use the online planning consultation system, where interactive documents can be found. Instructions on how to make comments are provided on the website. This method of responding to the documents helps us to handle your representation quickly and efficiently.

Please be aware that any representations made will be available for everyone to view, regardless of whether they are submitted by post or online.

Although we would prefer you to use the online system, comments made by email or letter will still be accepted. These will be summarised and entered into the online system so that other people can see them and they can be included in reports. If you wish to submit your representations in this way, we recommend you use our response forms as it helps us enter your responses accurately. Forms can be obtained by emailing: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk) or by telephoning the Strategic Planning Team on 01284 757368.

Forms may be sent by email to the address above or by post to:

Forest Heath District Council,  
Strategic Planning Team,  
West Suffolk House,  
Western Way,  
Bury St Edmunds IP33 3YU

If you need any further information, please feel free to contact the Strategic Planning team on 01284 757368 or [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

Yours faithfully

A handwritten signature in black ink, appearing to read 'M Smith', with a long horizontal flourish extending to the right.

Marie Smith  
Service Manager (Strategic Planning)

## Regulation 19 consultation leaflet

# Your homes, your jobs, your future...



Forest Heath  
District Council

## Local Plan Proposed Submission Consultation

### Have your say

This is your final chance to have a say on how your area will grow in the next few years.

#### Where are the sites?

Brandon	Beck Row
Mildenhall	Exning
Newmarket	Kentford
Lakenheath	West Row
Red Lodge	

Sites for housing or employment use are allocated in the above places as these already have a range of facilities and services:

#### You can comment:

Online: <http://westsuffolk.jdi-consult.net/localplan>

By email: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)

In writing: Strategic Planning Team, Forest Heath District Council, West Suffolk House, Western Way, Bury St Edmunds IP33 3YU

### 10 January 2017 - 21 February 2017

Find out more at any of our consultation events:

**Mildenhall** - Tuesday 17 January 4pm-7pm  
Forest Heath District Council's offices, College Heath Road

**Lakenheath** - Thursday 26 January 4pm-7pm  
Brendan Fulham Centre, High Street

**Newmarket** - Monday 30 January 4pm-7pm  
Town Council Offices, High Street

**Red Lodge** - Thursday 2 February 4pm-7pm  
Red Lodge Sports Pavilion, Hundred Acre Way

**Brandon** - Thursday 9 February 4pm-7pm  
The Brandon Centre, Brandon Library

This is your opportunity to find out more about the council's proposed submission Local Plans, which have been revised following public consultation. After this final consultation the plans and all of the responses received to them will be sent to the Secretary of State for examination by an independent planning inspector later in 2017.

## Summary of issues raised at Regulation 19 consultation events

### Mildenhall - College Heath Road Core Strategy (SIR) and Site Allocations LP Submission consultation event 17<sup>th</sup> January 2017: 4pm – 7pm

**Total visitors: approx. 25**

#### Comments

- Small boundary change needed to 54 Kingsway – owner submitted letter.
- West Row: Too much development proposed, concerned numbers increased from preferred options. A number of smaller sites would be better than 1 large site.
- Several attendees raised concerns about the adequacy of the station square junction in the centre of Mildenhall (and Queensway) to cope with further development to the west of the town. The possibility of a relief road to the north/east of the town (the 'original' plan) and south of the town (avoiding the Police Station Square junction altogether and ultimately joining up with the A11 near Red Lodge) was mooted.
- The Worlington Road is already extremely busy as people leave Mildenhall and access the A11 via Worlington/Red Lodge. This will become an increasing problem (as a consequence of further development to the west of the town) as commuters wish to access employment opportunities outside of Mildenhall via Worlington.
- Too much development to west of town will cause problems with traffic along Queensway and in Town around Police Station Square – need for relief road / by pass to south.
- Why are we developing good agricultural land?
- Need for affordable housing – housing provided by RSL's is not affordable on a low wage.
- Support for no further 'ribbon' development along the Worlington Road that would lead to coalescence with Worlington. Also for development along Station Road that might lead to coalescence with Barton Mills.
- Aspiration for a 'linear park' (blue/green corridor) from Barton Mills, running south of the town (the Lark Corridor) to the Jubilee fields (south of Sainsbury's) and on to West Row utilising the existing public footpath (that runs between Mildenhall & West Row) south of the hub. Important to be incorporated into the expansion of Mildenhall to the west.
- Housing growth must be supported with adequate employment opportunities.
- Need for small scale development in Barton Mills to sustain village. The settlement boundary could move south to old A11 to allow some infill / windfall. PC would like to see some growth in the village and take boundary further south to old A11.
- Concern re amount of growth in Exning and impact on roads through the village and the A142 junction.
- No need for hub, better to refurbish existing facilities / sites.
- The hub is in the wrong place to be accessed by the whole community – existing College Heath Road site is better.

- The school is the most important facility provided by the hub, sceptical if other public services need to relocate.
- Need for more parking spaces in new development.
- Need for houses to buy at affordable prices for local young people.
- Elements of SA4(a) are not in the ownership of County farms and may not be available for development.

**Lakenheath – Brendan Fulham Centre  
Core Strategy (SIR) and Site Allocations LP Submission consultation  
event  
26<sup>th</sup> January 2017: 4pm – 7pm**

**Total visitors: approx. 18**

Comments

- Concern regarding doctors' surgery and whether it will cope.
- Concern regarding doctors, schools and traffic congestion – these should be resolved before any more houses are built.
- Concern that number of houses is disproportionate in Lakenheath and that there isn't enough employment.
- The traffic evidence doesn't stack up and such a large school may not be necessary.
- Flight path issue to north on station road.
- Need for more Doctors.
- Sewerage and water capacity Undley road. (No water in taps).
- Housing need – not appropriate for district as too constrained.
- Development only here because of issues in Newmarket.
- Services – used to be three petrol stations and now none.
- In 1970 there were thirteen pubs and now there is only one and a half.

**Newmarket – Town Council offices  
Core Strategy (SIR) and Site Allocations LP Submission consultation  
event  
30<sup>th</sup> January 2017: 4pm – 7pm**

**Total visitors: approx. 29**

Comments

- Traffic in Fordham road A14 junction at capacity.
- Kentford – K17 – site promoted for; Employment, outside leisure and retail.
- SA6 (b) land at Black Bear Lane is in HRI use. What makes Brickfield Stud land different? Explained about bringing listed building back into use.
- Can SA6 (b) Fitzroy paddock, be made into a car park to free up All Saints and Grosvenor Yard as a housing site?
- Support for retaining open space for public use at St. Felix school site and identifying the Yellow Brick Road for enhancement.
- Exning - Persimmon site under construction – were junction improvements required at war memorial junction, as part of application?
- Why has horse racing land been allocated at Brickfield Stud? Will this comply/ break racing policy. Explained allocation in a local plan was the exception to the rule of protecting HRI uses, referred to DM policy and allocations in 1995 local plan.

- SA6 (b) Black Bear Lane should not be developed speculatively – retained for horse racing with a little development.
- SA6 (b) Black Bear Lane should be developed – good town centre site that has not been used for HRI for a long time and the listed buildings on the high street need to be restored, currently an eyesore.
- Trainers would be interested in Queensbury stables if it was for sale.
- Support for Hatchfield Farm – need for housing and employment benefits for tourism.

**Red Lodge– Red Lodge Sports Pavilion  
Core Strategy (SIR) and Site Allocations LP Submission consultation  
event  
02<sup>nd</sup> February 2017: 4pm – 7pm (BN, SR and MS)**

**Total visitors: approx. 8**

Comments

- Very unhappy with Hub in Mildenhall.
- Hub - Don't think facilities should be in one place.
- Hub - Fire station should not have to go through town.
- Hub - Five hundred spaces for cars will not be enough.
- Need for a link road to west of Mildenhall to cope with expansion.
- Red lodge needs P.O.S to take pressure off SSSI for recreation and dog walking.
- Need extra car parking in Mildenhall Town Centre.
- Need for sheltered housing in Red lodge – Was it part of the original Master plan?
- Road surfaces along Warren Road need to be repaired to the junction with Hundred Acre Way
- Need for a skate park in Red lodge
- Area west/ North of Turnpike Road should have some new facilities.
- Car Park on SSSI should be reduced but keep some parking for volunteers and visitors.
- Pleased that there is not any development in Freckenham
- Concern where access road to SA9 (b) and SA9 (c) will go.
- SA16 (n) should be B8 use only.
- Concern where school site is proposed and its poor relationship with employment.
- Concern traffic impacts at roundabout in Mildenhall and 5 ways roundabout as a result of west Mildenhall development.
- There are poor facilities, shops etc. in Red Lodge.
- Support a Morrison store at Newmarket but aware may not come forward.



**Brandon - The Brandon Centre, Brandon Library  
Core Strategy (SIR) and Site Allocations LP Submission consultation  
event  
09th February 2017: 4pm – 7pm (SR and JF)**

**Total visitors: approx. 19**

Comments

- Comments on the Gas House Drove site proposed allocation SA2 (b) and indicative layout pertaining to the current undetermined planning application. Comments were made in relation to the planning application proposed indicative layout and the poor relationship of proposed houses with the surrounding existing residential properties, including bungalows.
- Site allocation reference SA2 (b) Gas House Drove concern over access, as it's a single track road
- Brandon train station needs better facilities including a waiting room and real time travel information
- Provision of infrastructure should come forward before any houses
- Road improvements are still required in Brandon, even with the level of growth planned for the town in the SIR and SALP, to address existing issues
- Concern with proposed planning application for major development including 1650 homes on land to west of Brandon.
- Need for doctors and school provision
- Not building enough properties for local people
- Need to keep car park in old council library site, site allocation reference Sa2 (a) Land at Warren Close.

### Summary of key objections received to Proposed Submission Single Issue Review of Core Strategy Policy CS7

<b>Proposed Submission Core Strategy Single Issue Review: Summary of key objections raised in responses January – March 2017</b>	
<b>Section/Policy</b>	<b>Summary of key objections</b>
1. Background to the Single Issue Review process	Concerns about consultation process and acceptance of representations
1.6 (Sustainability Appraisal)	The Plan is not justified by the evidence available and the inadequacies of the SA make it inconsistent with national policy. It also calls into question the extent to which the document is legally compliant
1.7 (Habitats Regulations Assessment)	The Plan is not justified by the evidence available and the inadequacies of the HRA make it inconsistent with national policy. It also calls into question the extent to which the document is legally compliant
3.6/3.11 (evidence)	The Military Aviation Noise Contour Report for RAF Lakenheath dated 24th February 2017 should be added to the list of studies/evidence base documents that have helped identify the opportunities and constraints to growth in the District and taken into account in determining the distribution of housing
3.15 (Brandon)	Brandon should take a higher proportion of the housing growth
3.18 (Mildenhall)	The document acknowledges that RAF Mildenhall will become available by 2023, otherwise the development potential of RAF Mildenhall is ignored in this document and should be considered
3.19 (Newmarket)	Plan does not follow a sequential approach to development and places too much emphasis on Red Lodge. The three market towns should absorb most of the planned growth and if development at Brandon and Newmarket is to be restricted, the overall housing number for the district should be reduced
	Growing the rural villages will place high demand on services in Newmarket and cause harm to the racing community
	The 5ha of employment land required by Core Strategy Policy CS1 has not been met

<b>Proposed Submission Core Strategy Single Issue Review: Summary of key objections raised in responses January – March 2017</b>	
<b>Section/Policy</b>	<b>Summary of key objections</b>
	has the infrastructure to cope with more growth
	The plan isn't capable of delivering the level of affordable housing required in Newmarket
	The Hatchfield Farm allocation should be retained
3.23 (Red Lodge)	Scale of development at Red Lodge is too high (26.5% of overall growth for the district). Plan doesn't comply with national policy or CS1 and amount of growth does not follow sequential development and is unsustainable
	Insufficient infrastructure lagging behind that of the more sustainable market towns especially Newmarket
	Development of such large housing numbers should not be undertaken prior to the provision and building of a new primary school at Red Lodge
	Ability to deliver affordable housing is questioned due to track record of development at Red Lodge
3.20 (Lakenheath)	60% of growth in the district has been pushed to less sustainable rural villages and plan fails to adopt realistic alternatives. Growth should go to the three market towns
	Lakenheath should not be designated a Key Service Centre as does not meet criteria and services have declined
	Poor transport links/infrastructure
Policy CS7 Overall housing provision and distribution	The amount of growth does not follow a plan led sequential approach in accordance with the Core Strategy or NPPF
	Imbalance in the proposed distribution of housing. The plan should have a fairer distribution of housing reducing the pressure on places like Red Lodge and Kentford and meets the criteria of sustainability.
	The objectively assessed need for Newmarket has not been met and is inflexible
	10% buffer should be applied to OAN
	20% buffer should be applied to OAN
	Housing numbers should be increased to make allowance for unmet needs of neighbouring authorities
	Housing growth should be substantial and located near areas of employment.

<b>Proposed Submission Core Strategy Single Issue Review: Summary of key objections raised in responses January – March 2017</b>	
<b>Section/Policy</b>	<b>Summary of key objections</b>
	Building houses in rural locations will impact on the local infrastructure particularly roads and schools.
	Small scale allocations or framework changes should be considered in lower order villages to enable limited/controlled residential development to take place throughout the plan period.
	Housing numbers in Newmarket are too low
	Housing numbers in Newmarket should be a fixed limit in recognition of constraints
	Increases in traffic into Newmarket from residents travelling in from villages
	Hatchfield Farm site should be added to Newmarket housing numbers
	Additional homes at Lakenheath would reduce pressure on smaller villages
	No objective assessment of infrastructure requirements
	DIO consider the Council should reconsider the overall provision and distribution of housing in the District in line with the requirements of the NPPF Paragraph 123, the supporting Planning Practice Guidance Paragraph 3 and in line with the requirements of the Explanatory Note of the Noise Policy Statement for England
	Commitment to a Local Plan review in 2018 should be set out in policy

### Summary of key objections received to Proposed Submission Site Allocations Local Plan

<b>Proposed Submission Site Allocations Local Plan: Summary of key objections raised in responses January – March 2017</b>	
<b>Section/Policy</b>	<b>Summary of key objections</b>
Chapter 1: background, process and accompanying documents	Further detail should be included to cover infrastructure provision with planned growth
	Concerns about consultation process and acceptance of representations
	The Infrastructure Delivery Plan has not informed the plan policies
	The Plan is not justified by the evidence available and the inadequacies of the SA make it inconsistent with national policy. It also calls into question the extent to which the document is legally compliant
	The Plan is not justified by the evidence available and the inadequacies of the HRA make it inconsistent with national policy. It also calls into question the extent to which the document is legally compliant
Chapter 2: National and local planning context	Masterplan approach for each town centre should promote environmental enhancements
Chapter 3: Context, constraints and evidence base	New documents should have been added and included in the evaluation – noise contour map
	Traffic capacity constraints in the AECOM study have not been correctly determined
	Paragraph 3.9 and accompanying MOD Noise Contour 2015 Map - this should be supplemented with a reference to the Military Aviation Noise Contour Report for RAF Lakenheath dated 24th February 2017
	Cumulative and individual effects of traffic should be considered through modification to policies
	Insufficient capacity in foul sewerage network and infrastructure upgrades will be required. Crucial that development is phased so improvements can be made to meet demand
Chapter 4: How have the sites	A sequential approach to development with the market towns first should have been

<b>Proposed Submission Site Allocations Local Plan: Summary of key objections raised in responses January – March 2017</b>	
been selected?	followed
	RAF Mildenhall is a development alternative which has not been considered in the plan
	Further work required on the IDP to confirm the infrastructure impacts
SA1: Settlement boundaries	Secondary villages can provide modest residential growth.
	Alteration to Barton Mills settlement boundary to enable small scale growth to come forward
	The settlement boundary shown on Map 14 Moulton does not reflect the settlement boundaries found on the ground.
	Extend the Icklingham settlement boundary to include the Plough PH
	Modification required to Newmarket boundary is dependent on outcome of Hatchfield Farm High Court Challenge
	Policy should refer to council's approach to proposals outside of settlement boundaries
	Policy should not be used as a mechanism to restrict sustainable development
	Extend boundary at Brandon to include land to the west
<b>Brandon</b>	Levels of noise pollution too high for new development
	Safeguarding height limits for sites SA2(a) (b) and SA3 as advised by Defence Infrastructure Organisation
SA2: Housing Allocations in Brandon	It is DIO's contention that the Council should reconsider the allocations listed above in line with the requirements of the NPPF Paragraph 123, the supporting Planning Practice Guidance Paragraph 3 and in line with the requirements of the Explanatory Note of the Noise Policy Statement for England
	Amend policy to include land west of Brandon
New cemetery site	Should make reference to site of significant archaeological interest
<b>Mildenhall</b>	Adequate parking needed for increased population
	Traffic control at junction of Queensway and Mildenhall High Street needs to be considered, including provision of pedestrian crossings in Queensway.
	Old Station site should be included as an allocation
SA4(a) Focus of Growth – land west of Mildenhall	Safeguarding height limits for sites SA4(a) SA5(a) (b) as advised by Defence Infrastructure Organisation
	Uncertain if 1300 dwellings are achievable – no trajectory as to how site will be

<b>Proposed Submission Site Allocations Local Plan: Summary of key objections raised in responses January – March 2017</b>	
	delivered
SA5(a) Land at 54 Kingsway, Mildenhall	Minor boundary change to policy SA5(a) required to reflect land ownership
SA5(b) District Council Offices	Unrealistic to deliver 89 dwellings in 5 year supply given public buildings need to be closed and relocated
	Move text from policy to supporting text on archaeological requirement. It relates to SA5(a) not SA5(b)
<b>Newmarket</b>	Objection to the lack of a policy (and associated Policies Map allocation) which safeguards the route of the 'Newmarket Curve' for future re-opening as a railway
	Insert supporting text around Newmarket Surface Water Management Plan
	Plan needs to acknowledge that development to the north east of the settlement is constrained by potential impact on the horse racing industry
	Safeguarding height limits for sites SA6(a) (b) (c) (d) (e) (f) as advised by Defence Infrastructure Organisation
5.6.18 – SA6(a) Land at Brickfield Stud, Newmarket	Both of the Newmarket proposals would use racing stud land which if allowed would make the appeal decision not to all the Hatchfield Farm development hypocrisy
	Allocation raises concerns about potential impact on horse racing industry
SA6(b) Land at Black Bear Lane and Rowley Drive	No clarification in policy on uses or capacity for the site
	No certainty site can be delivered – complex planning history
	Historic England urge that the site allocation is amended to exclude the paddock at an appropriate point north of Falmouth Avenue. Without this amendment they are unable to support the allocation as sound.
5.6.20 – SA6(c) Land at Phillips Close and grassland south-west of Leaders Way/Sefton Way	Green area which should be protected
	Traffic increases and entry and exit onto Churchill Ave not appropriate
	Parking will spill onto Churchill Ave
	Surface water flooding issues
	Foul drainage issues
	Close proximity of horses training will put human and horse lives in danger
	Concerned about removal from policy of restriction of occupation for those working in horse racing industry

<b>Proposed Submission Site Allocations Local Plan: Summary of key objections raised in responses January – March 2017</b>	
	Archaeological situation on the site is uncertain
SA6(d) Former St Felix Middle School Site	Premature to consider site for housing when the neighbourhood plan is recommending use as a sports hub with adjacent playing fields
	Potential for adverse impact on the horse racing industry
	Wording changes suggested in relation to retention of open space
SA6 Housing and mixed use allocations in Newmarket	Housing numbers too low in Newmarket and the OAN isn't met
	Does not follow sequential approach to development
	Affordable housing provision at risk
	Newmarket has a good level of infrastructure which is underutilised.
	Contrary to local planning policy CS1 Red Lodge point 4.
	If the Hatchfield decision is quashed at the High Court the Preferred Options site should be reinstated in its entirety
	George Lambton Playing Fields should be allocated (omission site N/18)
	Appropriate to refer to archaeological conditions for sites (b) (c) (d) and (f) in supporting text
	Insert text to restrict occupation for those working in horse racing industry to SA6 (c)
<b>Lakenheath</b>	800 houses is too many for an already overstretched and busy village such as Lakenheath.
	Where is the local need for houses in this location
	Noise and vibration issues from RAF Lakenheath impacting on health – will worsen with arrival of F35s
	Need the infrastructure in place to support a development of this size – Doctors surgery at capacity
	The traffic to and from the village is already stretched being so near the USAF airbase and with another squadron expected in the next couple of years will only stretch it further
	Improvements required to non car modes of transport
	School under the flight path of RAF Lakenheath
	Lack of employment opportunities
	Surface water flooding issues not given enough consideration



<b>Proposed Submission Site Allocations Local Plan: Summary of key objections raised in responses January – March 2017</b>	
	<p>Include land west of B1112 as allocation, Little Eriswell</p> <p>Safeguarding height limits for sites SA8(a) (d) and SA7 (a) (b) (c) as advised by Defence Infrastructure Organisation</p>
SA7: Housing and mixed use allocations in Lakenheath	<p>Major traffic congestion at busy times. Already it's getting harder to get out of the village, Eriswell already a well known bottle neck</p> <p>Council should reconsider the allocations listed above in line with the requirements of the NPPF Paragraph 123, the supporting Planning Practice Guidance Paragraph 3 and in line with the requirements of the Explanatory Note of the Noise Policy Statement for England</p> <p>No mention of archaeological requirements – conditions required on sites (a) and (b) should be referred to for consistency</p>
5.7.12 Focus of growth North Lakenheath	<p>There has to be a full account of the MOD's objections and a far more comprehensive noise, vibration and environmental impact assessment before any allocation of a school is made to this area of Lakenheath</p>
SA8: Focus of growth North Lakenheath	<p>Uncertainty about deliverability and suitability of sites in relation to noise impacts</p> <p>It is DIO's contention that the Council should reconsider the allocations listed above in line with the requirements of the NPPF Paragraph 123, the supporting Planning Practice Guidance Paragraph 3 and in line with the requirements of the Explanatory Note of the Noise Policy Statement for England</p> <p>At present, the supporting text makes reference to archaeological requirements at site (d). For consistency, similar reference ought to be made to site (b).</p> <p>Amendment to formalise the agreed amount of land for school required</p> <p>Combined sites L28a and b should be included as allocations</p>
5.7.17 Employment sites	<p>The proposals are on good agricultural land, land liable to flooding, Traffic issues</p>
5.8.1 – 5.8.8 Red Lodge	<p>It would benefit the SSSI if the lorry park on Turnpike Road could be incorporated into the SSSI, providing it with a small parking area, with access for service vehicles to manage the site</p> <p>For the avoidance of doubt the word 'additional' should be inserted in front of 1129 in para 5.8.4</p> <p>Safeguarding height limits for sites SA9 (a) (b) (c) (d) and SA10 as advised by Defence Infrastructure Organisation</p>

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SA9 (c) Land East of Red Lodge	Paragraph 5.8.18 should be updated to acknowledge that planning application F/2013/0257/HYB has now been approved following completion of a legal agreement
SA9: Housing allocations in Red Lodge	Too much development is allocated to Red Lodge The affordable housing provision is placed at risk by allowing such large numbers of houses to be provided in Red Lodge within the last 10yrs of the plan
	Red Lodge saw an 18% growth in population over a 2yr period between 2011 and 2013. Needs time to absorb this large population growth before considering additional large scale development
	Policy CS1 states "Due to the recent expansion of Red Lodge; No greenfield urban extensions will come forward prior to 2021"
	Such massive housing numbers are an unsustainable option
	The sewerage system is unable to cope with additional housing at Red lodge and the embargo against development in this location needs to be reinstated.
	Include omission site RL/07 for 80 homes and horse racing uses
	Policies SA9 (b) (c) (d) are in conflict with the vision for Red Lodge set out in the Core Strategy. Amend site SA9(a) to include 10 Heath Farm and land south of Carrops
SA10: Focus on growth Red Lodge	Policy SA10 is in conflict with the vision for Red Lodge set out in the Core Strategy
	Development of this size at this distance from the SPA may require mitigation to offset recreational effect to Stone Curlew
<b>Beck Row</b>	Safeguarding height limits for sites SA11 (a) (b) (c) (d) as advised by Defence Infrastructure Organisation
SA11 Housing Allocations in Beck Row	Land at Stock Corner Farm should be allocated for development
	Land at Wilde Street should be allocated for development
	Council should reconsider the allocations listed above in line with the requirements of the NPPF Paragraph 123, the supporting Planning Practice Guidance Paragraph 3 and in line with the requirements of the Explanatory Note of the Noise Policy Statement for England
	Include omission site BR/23 at White Gables
<b>Exning</b>	Omission site E/16b should be allocated – performs better against the SA objectives. The SEA does not meet the requirements of the regulations.
	Paragraph 5.10 should be amended to accord with paragraph 158 of the NPPF

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	Safeguarding height limits for sites SA12 (a) as advised by Defence Infrastructure Organisation
SA12(a) Land south of Burwell Road, Exning	Village roads, particularly Oxford Street, Swan Lane and Windmill Hill are struggling to cope with peak period use
	Impact of the allocation on surrounding road network
	An additional 205 houses would add an estimate increase to the village population by 33% and an additional 400 vehicles
	Appropriate to include a reference to archaeological conditions within the supporting text
SA12: Housing Allocation in Exning	Policy should include the allocation of land off Heath Road as suitable and sustainable alternative
<b>Kentford</b>	The village needs further housing allocated to provide choice beyond 5 years and to address social infrastructure issues
	Para 5.11.2 should refer to 'water recycling centre' rather than 'waste water treatment works'
	Allocate omission sites K/05 K/06 K/13
	Allocate omission site K/17 for employment/leisure use
	Safeguarding height limits for sites SA13 (a) (b) as advised by Defence Infrastructure Organisation
SA13: Housing and mixed use allocations in Kentford	Allocate land east of Gazeley Road (K/14) for 70 dwellings to meet long term needs
	Review boundary of 1500m stone curlew constraint zone to ensure consistency with East Cambs Local Plan proposals map
	Reference to archaeology could be moved to supporting text
5.12.8 – 5.12.11 SA14(a) Land east of Beeches Road	This outline development area does not include the 7 self build plots that were passed in DC/14/2047/HYB which would seem to be an omission.
	Neither the infrastructure or sustainability to absorb this large scale development in one hit
	The village lies at the heart of "C" roads and the school is at maximum capacity. Safety concerns over traffic access at the school
	The character of the village will be ruined. Opinions of residents never considered

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	Need a consistent approach to boundary modifications
	Safeguarding height limits for sites SA14 (a) as advised by Defence Infrastructure Organisation
<b>West Row</b>	Allocate a larger number of smaller plots which can be developed by villagers
SA14: Housing Allocation and school expansion at West Row	Omission site WR/14 should be allocated
Secondary villages	The settlement boundary of Holywell Row should be amended to include the land at Laurel Farm
	Allocate 2.15 site at Worlington
SA15: Moulton Primary School	Safeguarding height limits for sites SA15 as advised by Defence Infrastructure Organisation
<b>SA17: Employment allocations</b>	The employment allocation at the Hatchfield Farm site should be retained – under provision of land in Newmarket
	Horse racing industry isn't shown as one of six employment sectors
	Inadequate employment site identified at Lakenheath – no evidence could be developed
	Settlement boundary should be extended at Fothergills Seeds, Kentford as part of existing employment site
	Land off A11 at Herringswell Road, Barton Mills proposed for employment
	Land off Fiveways roundabout proposed for B1/2/8 uses
<b>Retail and town centres</b>	Amend para 7.7 to allow for mixed use
SA18: Retail allocation	Wording of policy is inflexible and should be amended to allow other forms for development to come forward
	Policy should be amended to allow for additional uses and the retail floor space an 'upto' figure'