

Corporate Forest Heath Local Authority Comments to Pre Submission Newmarket Neighbourhood Plan 22nd June 2018 Version 29 (Pre Sub NNP).

Community Action 2: View from Old Station Road (pg 19) - Aims for the NTC to "lobby for parking to be limited at the foot of the Warren Hill Gallops on Old Station Road" as informal parking here is stated to "detract from the iconic view of Warren Hill". The view from Old Station Road towards Warren Hill referred to is not captured by the present wording of Policy NKT1: Key Views. Parking on Old Station Road is likely to be generated from a variety of sources including local residents, local employers and employees and visitors to the town. SCC's views as the Highway Authority should be sought.

Para 2.2.3 (pg10)– this paragraph states that a waste recycling centre has been lost to the town. However, the Depot Road site is still open, and is operated by Open Door – Newmarket. It is protected as a Waste site reference "FH5/SAR15 – Newmarket Open Door", within the emerging Pre-Submission Suffolk Minerals and Waste Local Plan, (which will supersede the existing 2011 Plan) see: <https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/minerals-and-waste-local-plan-consultation/> Please therefore delete reference to this being lost within paragraph 2.2.3.

Para 2.3.5 (pg11) – describes services lost to the town. There is still a Police Station in Newmarket, and it has relocated to the Fire Station site. Paragraph 2.3.6 does mention the combined Fire and Police – in contradiction to the text in 2.3.5. In addition Newmarket still has emergency accommodation for the homeless, and in fact more provision has recently been secured. The NNP text should be accordingly updated.

Para 2.3.6 (pg 11) - This list of assets does not mention the Home of Horse Racing Museum. You may also wish to reference FHDC's Public Open Space Survey 2017-2018 for Newmarket (Appendix D) the sites listed therein are considered green assets, and in addition, FHDC's children's play provisions (Appendix E). Studlands Park Community Centre (also referenced) is in the process of changing management to Little Buds nursery.

Para 3.1.3 (pg 13) – raises the infrastructure needs to deliver development in Newmarket. It is suggested that this should include the need for "additional affordable housing provision to meet the high demand for such properties within the town".

Policy NKT5 (pg 23) - A Town Museum/Arts Centre/Tourist Information. FHDC own this site and has recently carried out an Options Appraisal for various uses including the community uses suggested. A museum, arts centre and tourist information use were found to be commercially unviable, and a residential use for the buildings fronting Palace Street and office use for the buildings to the rear is the District Council's preferred option. The Coach House

cannot therefore be considered available or deliverable for the proposed uses in the NNP at this time.

It is recommended that the policy be reworded more generically removing references to the Coach House and stating that appropriate proposals for a mix of visitor attractions including A Town Museum/Arts Centre/Tourist Information office will be supported. An alternative town centre location could also be considered for the proposed uses if a deliverable site can be identified elsewhere.

Para 4.4.2 (pg 26) - this paragraph states that for Newmarket Hospital, a maternity unit and A&E department should be reinstated. Is there any evidence for these requirements for maternity and A&E services specifically? **Policy NKT7 – Hospital site (pg 26)** – FHDC are aware that the use of this site is currently being reviewed by the landowner and is part of ongoing master planning work. Please confirm whether the landowner has been consulted? In addition, please note that this site is currently part of the One Public Estate Public Asset Study, which is expected to report in Autumn 2018. Aspirations for this site include mixes other than health services. In relation to Policy NKT7 and the supportive text, it is suggested that NTC liaise with all parties engaged in the One Public Estate public asset study, NHS England, and West Suffolk Clinical Commissioning Group (including the PCT), in order to ensure that the policy is deliverable and the supporting text is appropriately evidenced.

Para 4.4.5, (pg 28), Policy NKT9 – Special Educational Needs, and Community Action 9 – Special Educational Needs Provision – FHDC is aware that an initial application has been made to list the former Police Station as an Asset of Community Value (ACV) and **accordingly, NTC should seek independent legal advice if they wish to allocate/ designate the specific site within a policy**. In order to be deliverable, Policy NKT9 should also have the support of the landowner, and it is recommended that NTC liaise with SCC as the lead education authority regarding the education requirements and future roll demands for Special Educational Needs and Disability (SEND) children within Newmarket town. The need for a designated centre for special educational needs is not evidenced by NNP currently. Community Action 9 appears to duplicate Policy NKT9, and should be deleted.

Para 4.4.8, Policy NKT10 – Employment sites (pg29) – The NTC’s aims to support employment within the town is welcomed. To make the policy more useful, NTC may wish to consider the use of locally specific criteria for which applications for starter businesses and extensions/ expansions will be considered. They should also define the terminology used, so it is clear when the policy is applicable.

Paras 4.4.11- 4.4.14 (pg 31) - Sporting Recreation and facilities - FHDC welcome NTC’s strategic priorities in relation to sport and recreation. However the assertions within para 4.4.13 should be substantiated. **Para 4.4.12 (pg 31)** evidences the recreation and leisure aspirations to the Newmarket: Enquiry by Design Workshop Report 2013. The identified priorities in para 4.4.11 should be taken in the wider context of what the Prince’s Foundation were suggesting in terms of both the former Scaltback and St Felix school sites.

It would be helpful for the NTC to consider the more recent evidential findings of:

1. **West Suffolk Strategic Plan 2014-2016.** - This incorporates an aim to create "resilient families and communities that are healthy and active," which is achieved through (amongst others), improved wellbeing, and access to open spaces.
2. **West Suffolk Sports Strategy, (Executive Summary 2016)** see: https://www.westsuffolk.gov.uk/leisure/Sport_and_Healthy_Living/activity/physicalactivitywssportsfacilitiesassessment.cfm This includes the Indoor Facilities Strategy and Playing Pitch Strategy.
3. **The Indoor Facilities Strategy - 2016,** see: https://www.westsuffolk.gov.uk/leisure/Sport_and_Healthy_Living/activity/upload/WestSuffolkIndoorFacilitiesStrategyV16160201.pdf
4. **The West Suffolk Playing Pitch Strategy - 2015,** see: https://www.westsuffolk.gov.uk/leisure/Sport_and_Healthy_Living/activity/upload/WestSuffolkPPSActionPlanandStrategyDraftv304G-2.pdf
5. (Please note that the data that formed the basis of the Strategies listed at 3 and 4 is in the process of being updated in conjunction with a review of the **FHDC Open Space Sport and Recreation SPD** that was last adopted October 2011 and that projected population figures for Forest Heath and Newmarket have been updated since the levels described in the respective Strategies.)
6. **Forest Heath District Council - Evidence paper for Single Issue Review (SIR) of Core Strategy Policy CS7 and Site Allocations Local Plan - Accessible Natural Greenspace Study,** January 2017, see: https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/16-11-23-Accessible-Green-Space-Study-Jan-17.pdf
7. See also: **West Suffolk: Promoting Physical Activity Strategy - 7 July 2016:** https://www.westsuffolk.gov.uk/leisure/Sport_and_Healthy_Living/activity/index.cfm
8. **A Public Open Space survey of Newmarket 2017-2018** (Appendix D) used the FIT guidance in accordance with requirements within the FHDC SPD for Open Space, Sport and Recreation Facilities, (which states six acre standard of 2.4ha of freely accessible green space per 1000 head of population). The 2017-2018 survey revealed that based on a population of 20,384 within the 2011 census for the town of Newmarket, (which is likely to be higher at today's date), there was a requirement of 48.92ha. Based on the historic figure there is a deficit of 27.43ha (or 22.32ha if NTC and SCC POS is included).

Policy NKT11(pg 31) – Community Sports and Recreation Area –

designates the GLPF and playing fields at the former St Felix School site as Local Green Space. It further requires the provision of a shared community sports hall, including space for informal recreation. It is important to understand how any future public use of any of the pitches at the former St Felix site will relate to the proposed Site allocation SA6(d) for 50 dwellings within the Site Allocation Local Plan submission version, (SALP). It may be possible for any future public pitch

use to work alongside a residential redevelopment on the footprint of the St Felix school site, but a satisfactory relationship would need to be demonstrated. Public access to the pitches on the former school site would additionally require consent from the landowner, in this instance Suffolk County Council.

The aspiration for a community sports hall/ sports facilities on the GLPF and St Felix site and joining up the sites as wider public open space/ pitches could address the shortfalls created by the loss of the hall facility at the former Scaltback Middle School site. The two owners of the sites (SCC and The George Lambton Trust) would need to be supportive of this aspiration, the need would need to be evidenced, in addition to suitable funding being secured in order for the policy to be deliverable.

Para 4.4.19 and Community Action 17 – Allotments (pg35) – FHDC consider that Community Action 17 is not required. Allotments are already protected as type of “community asset” in a planning policy sense by JDMPD Policy DM41 - Community Facilities and Services.

Furthermore, both existing allotment sites mentioned by the NNP at para 4.4.19 (New Cheveley Road allotments and Field Terrace Road Allotments) are established and long-standing allotment sites. (It would be helpful for any referenced site to be visually shown on a map to aid identification). Statutorily, FHDC cannot disposal of allotment land without consent by the Secretary of State for HCLG. This is still enacted by Section 8 of the Allotments Act 1925.

If NTC wish to identify new sites for allotments, then subject to satisfactory evidence supporting the need, and considering the deliverability of the scheme, NTC could consider the community’s Right to reclaim land: <https://www.gov.uk/government/publications/youve-got-the-power-a-quick-and-simple-guide-to-community-rights> If NTC do wish to proceed with this, then once they have gathered appropriate evidence, they would need to depict any new allotment site allocations on a proposals map within the NNP. It would then be helpful if you could please liaise with FHDC’s Damien Parker – Service Manager – Operations, Leisure and Culture and Newmarket’s Locality officer, Will Wright.

Section 4.2, in particular objectives 2-5...- Energy, sustainability and adaptability to climate change (pgs 37-45 in particular)

Objective 3 (pg 37): To value and protect our environment – states that “we should aim to make the town carbon neutral and to mitigate the expected effects of climate change.” However, none of the following policies or community actions make any further mention of this aim since previously drafted Policy 14: Sustainability Statements has been deleted given that it duplicated strategic policies JDMPD Policies DM6 and DM7.

Objective 4 (pg 43): To develop sustainable housing within the boundary of the designated area – Policy NKT17: Sustainable design features states that new houses should “be energy efficient (using measures such as communal heating)”. We are unclear why this measure has been particularly singled out?

Forest Heath District Council, (as part of the West Suffolk Councils) adopted The West Suffolk Energy Framework adopted in June 2018. This is in the process of being uploaded in final version; in the meantime the approved draft can be found via:

<https://democracy.westsuffolk.gov.uk/documents/s28729/CAB.JT.18.007%20Appendix%20B%20West%20Suffolk%20Energy%20Framework.pdf>). Through the Energy Framework, the Councils set out their shared vision that *"West Suffolk's residents and businesses will have access to clean, resilient and affordable energy"*. Key Energy Framework objectives most relevant are as follows:

- *We will work to reduce CO₂ emissions by 35% by 2025 and 75% by 2050 based on 2010 levels working*
- *Homes are as energy efficient as practicable with new homes built to low carbon emissions standards.*

Further, the Councils endorsed in June 2018 the Local Energy East Strategy: An Energy Strategy for the Tri-LEP Area (May 2018: Endorsement copy for stakeholders). The Strategy sets out as one of its key themes to, *"Secure, local, affordable, low-carbon consumption – we will work to increase energy efficiency and improve energy affordability; reducing fuel poverty. And we will work to reduce carbon emissions and improve air quality"*.

In summary then, FHDC (and West Suffolk Councils) support communities in being *"Resilient"* which in place making terms means *"A place that serves communities in the long-term through buildings, habitats and infrastructure which are durable and flexible."*

The District Council has an ambition to encourage the aspirations for energy efficiency levels in buildings as well as the uptake of renewable energy technologies, especially renewable heat and district heating. It is taking an active approach to this, and may be able to provide technical and financial support for community energy initiatives via one of the following programmes:

- **Solar for Business** – provides financial support for renewable energy installation, primarily solar but also renewable heat and increased levels of energy efficiency - <http://www.greensuffolk.org/assets/Greenest-County/Business/Funding/West-Suffolk-EE-Funds.pdf>
- **Community energy planning** – this programme may be able to provide support for technical and professional services to support feasibility of a community or local area approach to heat and or power - <https://www.westsuffolk.gov.uk/environment/Energy/communityenergyplanning.cfm>

We would welcome contact from NTC to discuss how/if the District Council may be able to support the wider aspiration to make the town of Newmarket "carbon neutral" and "to mitigate the expected effects of climate change". This collaborative work may also assist the NTC in drafting an evidenced and deliverable planning policy to achieve its aspirations within the Neighbourhood Plan. Please contact Oliver Ingwall-King, Energy Advisor on 01284 757052 or

Andrew Oswald, Environment & Energy Team Leader, 01284 757622, Andrew.Oswald@westsuffolk.gov.uk for further information.

Furthermore, the Suffolk Climate Change Partnership and the Suffolk Association of Local Councils recently ran a training event on Neighbourhood Planning and Community Energy schemes on 4 June 2018. We are aware that NTC sent their apologies and were unable to attend this event, but FHDC strongly recommends that NTC considers the helpful material on how communities can engage with community energy, contained within the presentations - which includes using a neighbourhood plan as a tool as one way to do this. The presentations can now be found online: <http://www.greensuffolk.org/green-communities/community-energy-and-neighbourhood-plans/> You may wish to contact John Taylor, Project Officer - Suffolk Climate Change Partnership Strategic Development, Suffolk County Council on 01473 264595 or 07872 008451 or John.Taylor3@suffolk.gov.uk for further information.

Community Action 20(pg 37) - Visual Impact of Roadsides and Industrial Buildings

- It is suggested that this Community Action should be reworded. Please liaise with SCC as Highways Authority who have jurisdiction for verge maintenance along the public highway in line with published policies that tend to prioritise verge maintenance for safety rather than aesthetic purposes. Requiring higher maintenance levels than usually sought by current policies is likely to have funding implications, and would not be reasonable to require for the town of Newmarket above any other settlement in West Suffolk, unless there is an evidenced local need for this. NTC are advised to seek SCC's views and if there is an evidenced requirement for a higher standard than the Highways Authority may maintain, it is suggested that NTC themselves could consider improving the verges by seeking funding opportunities and contacting Will Wright- Locality officer for Newmarket in this regard on will.wright@westsuffolk.gov.uk or 01638 719763 in conjunction with liaising with the Highway Authority. In addition part (b) of the Community Action 20 could refer to verges' usefulness as part of an integrated Sustainable Urban Drainage system. Again, NTC should liaise with SCC as Lead Flood Authority on this. Overall the community action emphasises (a) industrial estates and (b) industrial buildings - it is suggested that the action could usefully address all verges in the town rather than highlighting industrial verges. Accordingly it is recommended that the community action 20's wording as drafted should be amended.

Para 4.5.5 (pg39) This paragraph raises concerns with air quality in Newmarket High Street and Old Station Road. It references an Air Quality Action Plan for Newmarket published in 2017 by West Suffolk Councils. There is no such AQAP, so reference to this should be deleted.

Policy NKT14 (pg 39) - Air Quality - Criteria (i) states that proposals should have "no adverse impact". However, all developments will, in theory, have some negative impact, so this criteria needs to be better defined such as "no moderate adverse impact". In addition, if (i) is to be limited to the town centre then this town centre should be defined, perhaps being shown on a proposals map accompanying the policy. However, this criteria would be equally applicable beyond the town centre, so perhaps "town centre" could be replaced by the "town of Newmarket."

Para 4.5.6 (pg 39) and in other locations the wording “electric cars” should be changed to “electric vehicles”.

Community action 22 (pg 39) – air quality - seeks electric charging points at any new taxi rank. It is not appropriate to have electric charging actually on a taxi rank, as there is a high turnover of vehicles within the rank and taxis are not stationary for any length of time. The best charging speeds with present technology would require 20 minutes to provide a reasonable charge range to a vehicle, which would not be practical on a taxi rank. It would be better to revise the community action wording to require rapid charging facilities in the town centre, near the established taxi ranks, but not actually within them.

Policy NKT17 (pg43)- Sustainable design features for new housing– FHDC suggests that the criteria within this policy could be expanded upon to incorporate the following requirements:

- all meet the minimum space standards as set out in the National Described Space Standards, Technical Guide.
<https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard> . This approach is supported by the District Council, as set out in Table 1 of the West Suffolk Technical Advice Note:
https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/171205-Space-Standards-at-Dec-2017-for-West-Suffolk-FINAL-clean-version.pdf that is used to assess residential developments by the Local Planning Authority currently in conjunction with JDMPD Policy DM22.and will be featured within the emerging West Suffolk Local Plan.
- be provided with sufficient amenity space – again NTC may wish to refer to section 4 of the West Suffolk Technical Advice Note, which is used to assess residential developments by the Local Planning Authority currently in conjunction with JDMPD Policy DM22.
- all housing development should be of a size, configuration and internal layout to enable Building Regulations requirement M4 (2) ‘accessible and adaptable dwellings’ to be met; and
- 5 per cent (rounded up to the nearest whole unit) of the affordable housing component of every housing development providing or capable of acceptably providing 15 or more self-contained affordable homes,(Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use), should meet Building Regulations requirement M4 (3) ‘wheelchair user dwellings’ to be wheelchair accessible or be easily adapted for residents who are wheelchair users.

Policy NKT19 (pg 44) – Affordable housing - it is recommended that this policy also states that affordable housing clusters should not exceed 15 dwellings. See guidance for developers within the West Suffolk Affordable Housing Supplementary Planning Document (2013) -
https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/Joint-affordable-housing-SPD.pdf).

Policy NKT20 (Pg 44) – Dwelling Statements – criteria (b) should insert the word “or” so that: net additional dwellings OR exceeding 1000sqm of gross internal floor area...

Para 4.7.6 (pg 46) – Pedestrian and cycle routes – seeks to encourage a connected network of walking and cycle routes, which is supported. NTC may wish to support this aspiration through an associated community action on safe cycling initiatives. Please liaise with SCC in this regard.

Policy NKT22 (pg 46) – Pedestrian and Cycle Network references “cycle ways” on “Fordham Road, Old Station Road and New Cheveley Road”. In order for the policy to be achievable, feasibility studies of cycle ways on the specified roads should be undertaken. For example, New Cheveley Road is characterised by parked vehicles along much of its length within the town, and we are unsure where a cycle way may be safely accommodated within the carriageway without displacing residents parking. NTC should consult SCC as Highways Authority in this regard.

Para 4.7.15 (pg 51) - This states: “The current car parks are inadequately signed, poorly maintained and unattractive and this is unacceptable.” – NTC are requested to amend this wording. All of the Local Authority managed Newmarket car parks have been awarded ParkMark accreditation by the Police and the British Parking Association – this considers crime rates, perception of safety, ease of use, signage, convenience and condition. It is not possible to attain this award and be inadequately signed, poorly maintained or unattractive. Last year the car parks were also awarded Disabled Parking Accreditation by the DMUK – this award demonstrates a commitment to providing high quality. Car park usage last year also grew and bucked the general trend nationally.

“The use of on-street parking on the High Street is extremely inefficient; the lack of enforcement means the turnover of ‘stop and shop’ spaces is considerably lower than it should be.” West Suffolk in conjunction with SCC have applied to the DfT for powers to enforce the on street parking environment, part of that initiative is the development of a Newmarket Parking Plan by SCC which will consider new parking design/restrictions in the High Street and elsewhere. SCC will also reconsider the issue of resident parking schemes. Previous exploration failed to attract enough support from residents to be viable. NTC may wish to revise the words accordingly and certainly should revisit Community Action 35 if the desire for residential parking restrictions is not supported by residents.

In summary, FHDC consider that there is no evidence for the assertions about current Newmarket car parks within the current Pre-submission draft paragraph 4.7.15, and as such, unless this text is altered, it is likely to be challenged by a future independent examiner of the Neighbourhood Plan.

Policy NKT29 (pg 51) - Enhancement and continued provision of car parks - *“a. Any development of car parks in the town centre shall make them an attractive feature of the town, for example by:*

- *suitable planting of trees and shrubs (providing shade, habitats for birds and visual enhancement)*
- *providing clear town maps*
- *installing electric car chargers (or improved technology)...”*

Please consider adding to the wording in relation to the first bullet point of criteria (a) that: “the planting of trees and shrubs should not affect coverage of CCTV cameras, or lighting, or take car bays out of action”.

Community Action 36 (pg53) seeks to “encourage the allocation of space within Grosvenor Yard car park for waiting taxis so that no more than 6 taxis are waiting in the High Street at any one time, and to ensure that this is enforced” – FHDC is not able to support this NTC aspiration. The Traffic Regulation Order governing the terms and conditions of use prohibits commercial or private gain activity in public car parks. The District Council currently make no provision for allocated taxi bays in any public car park currently and are not likely to reconsider this soon. This community action 36 would also be difficult to enforce, given that taxi use and turnover is determined by footfall. It is suggested that this community action is deleted. Alternatively, NTC could seek to allocate land for an overspill taxi rank in a town centre location with access to EV charge points (should charging speeds improve). However, FHDC is not aware of the availability of any such sites at the present time, so this aspiration is unlikely to be deliverable.

Policy NKT31 (pg55) – Guineas Shopping Centre ...(and linked Policy NKT12 (pg33) Cinema, Policy NKT24 (pg47) cycle racks, Policy NKT27(pg50- Bus Station) and Policy NKT29 (pg51) – Enhancement and continued provision of car parks - It would be appropriate for NTC to work alongside FHDC on a realistic, comprehensive policy for the Guineas shopping centre site capturing the NTC’s desire for a cinema, improved bus station and cycle racks, and car parking where this is practicable. FHDC support that the Guineas Shopping Centre should be attractive, it is performing economically and in a central location adjacent to Newmarket’s historic core. However, we are not clear on what the policy means by the policy requirement that the shopping centre as redeveloped would, “rejuvenate the grid of minor pedestrian routes” linking to the High Street. This may not be deliverable as drafted. It would be appropriate to consider the design of the shopping centre in context, within the forthcoming Newmarket Town Centre Masterplan. The policy wording should accordingly be changed.

Ends

