

Local Planning Authority Comments to Second Pre Submission Newmarket Neighbourhood Plan Consultation Version – January 2019 (Pre Sub NNP).

The significant progress that has been made on the Newmarket Neighbourhood Plan (NNP) since the 22nd June 2018 draft V29 previously commented on, and subsequent amendments made as a result of these comments are noted and welcomed. However before the NNP is formally submitted to FHDC as the Local Planning Authority, we would recommend that the comments below are considered and addressed as appropriate.

Section 1: Introduction: What is a Neighbourhood Plan?

Para 1.6

Comment: It is suggested that the first sentence is amended to read “These four documents are in general conformity with the National Planning Policy Framework...” to better reflect the relationship between local plans and the NPPF. It should be noted that the existing development plan documents were advanced under the 2012 NPPF whereas the NNP will be examined against the new 2018 NPPF.

The relevance of quoting paragraph 11 and in particular criteria (b) of the NPPF is questioned as the NNP does not deal with strategic policies. (See NPPF para 18). It is suggested quoting elements of NPPF paras 12, 29 and footnote 16 as they relate to neighbourhood plans might be more appropriate in this section.

Section 3: Newmarket's heritage and character

3.8. Overview of the modern town

Comment: Para 3.10: Policy CS13 – Infrastructure and Developer Contributions of the Forest Heath Core Strategy aims to ensure that improvements to infrastructure, services and community facilities are secured to mitigate the impact of development. Additional services and facilities are normally secured through growth and higher levels of growth are likely to make services more viable. It is unlikely that minor levels of growth would trigger the reinstatement of the services listed. It is suggested the third sentence is reworded to read ‘If the town is to develop in a sustainable manner, these services could be reinstated, together with improvements to other infrastructure commensurate with the level of growth proposed.’

Newmarket is also considered to have good public transport links in comparison to similar size towns as it has regular train and bus services to surrounding larger settlements such as Bury St Edmunds, Cambridge, Ipswich and Ely. Although a more comprehensive service is always desirable the statement that ‘public transport is limited’ is considered inaccurate in the context of other smaller and comparable sized settlements in the district.

Section 4: Framework for future development

Comment: Para 4.1: It is suggested the second sentence is reworded as follows ‘Five residential sites and two mixed use sites, including 400 dwellings at Hatchfield Farm, have been identified...’ To clarify the Hatchfield site is an allocation as well as the subject of a called in planning application.

Paras 4.2, 4.3 and 4.4 repeat much of the supporting text in the Newmarket chapter of the FHDC Site Allocations Local Plan (SALP). As once 'made' the NNP will form part of the development plan there is no need for this repetition.

Notwithstanding the above the bullet points of para 4.3 do not accurately reflect the wording of para 5.6.16 of the SALP to which they are attributed.

Section 5: Objectives and Policies

Paragraph 5.2 - The list of objectives are supported and welcomed.

Objective 1: To promote and maintain the character of the town

Policy NKT1: Key Views

Comment: The inclusion of the key views from the Newmarket Conservation Area is welcomed. However the view from Warren Hill is not listed in the appraisal as a large part of Warren Hill is in East Cambridgeshire and therefore outside of the Forest Heath and Newmarket Neighbourhood Plan Area.

A cross reference to the photos from key viewpoints in section 13 of the NNP in either the supporting text or criteria b of the policy would be beneficial to the reader.

The numbered key views on the policies map help interpretation of this policy and are welcomed. However the Map of Key Views on page 21 of the NNP does not appear to show views from the same location as those on the policies map and has the view cones transposed in the opposite direction.

Policy NKT2: St. Mary's Square and St. Mary's Churchyard.

Comment: The designation of this area as an environmental improvement area containing local green space is welcomed. However the extent of the allocation shown on the proposals map needs to be reconsidered as the area shown as an area of environmental improvement does not include all those areas listed in criteria b and c of the policy and as defined talks about 'development' in areas the policy seems to be aimed at protecting by allocating as Local Green Space. It is suggested the boundary is extended eastwards to include the Rowley Mile – Mill Hill junction and the frontages of the listed buildings on the east side of Mill Hill; southwards to include Crawford House to 30 St Mary's Square and northwards to include Ice well Hill Flats.

It is suggested the phrase 'is the only high rise development in the town' is amended as high rise buildings are generally considered 7 – 10 storeys in the UK. The Icewell Hill flats are between 4 – 6 storeys. See: https://www.designingbuildings.co.uk/wiki/High-rise_building)

Any allocation proposing the redevelopment of the buildings in this area would require the cooperation of the landowner and residents – have they been contacted and do you have evidence of support for the proposal? If not the deliverability / viability of the Submission NP could be questioned.

Policy NKT3: Facilities for the Horseracing Industry

Comment: Para 6.10: The statement that a new all-weather race course would offer means to mitigate the situation where the most traffic occurs in the town on race days needs further explanation as a new all-weather course is likely to generate more year round trips to the town from race goers.

Policy NKT3: Development relating to the Horse Racing Industry (HRI) is dealt with by Policy DM47 of the West Suffolk Joint Development Management Policies Document (Feb 2015). This policy is positively worded with criteria to ensure inappropriate proposals are resisted. NNP policy NKT3 does not contain these checks and balances for all HRI proposals or add to policy DM47 of the JDMPD, it is therefore suggested it is deleted. A suitably worded policy allocating a site for an all-weather racecourse if in the NNP area, or supporting such a proposal in principle subject to design, traffic mitigation and other policy constraints, if partially in a neighbouring parish and LPA area, would be more appropriate.

Policy NKT4: Provision for New and Growing Businesses

Comment: The principle of this policy is supported and welcomed, however the issue of home working can be contentious and needs careful consideration. Self-employment or other paid employment, from or within a domestic property does not always require planning permission and it is suggested that the NNP advises that guidance is sought from the LPA to ensure that any proposed or existing activity is acceptable and authorised.

For many low-key home working activities permission may not be required. If required, proposals will be judged against current local planning policies and government planning guidance. Protection of the environment and the maintenance of safe and peaceful residential areas will be a prime consideration. Specific regard should be taken of the suitability of the premises, its surroundings and the intended use. The following are unlikely to be suitable for the majority of domestic properties:

- employment of people not normally resident at the address;
- generation of significant delivery or despatch traffic;
- activities that create any type of disturbance, for example, smell, noise or dust;
- direct retailing and visits by the general public.

If the building needs to be modified in any way, such physical changes may require both planning permission and compliance with Building Regulations. If planning permission is required, particular consideration will include:

- Will the dwelling no longer be used mainly as a private residence?
- Will the business result in a marked rise in traffic or people calling?
- Will the business involve any activities unusual in a residential area?
- Will your business disturb your neighbours at unreasonable hours or create other forms of nuisance such as noise or smells?
- Is there be an impact on road safety?
- Are the car-parking and delivery facilities adequate?
- Will any bulky business materials need to be stored? Outside storage in particular, is unlikely to be acceptable.

A planning permission, if required, may have special conditions attached to it, such as specific hours of operation, no retail sales or outside storage.

You do not necessarily need planning permission to work from home. The key test is whether the overall character of the dwelling will change as a result of the business, is it still mainly a home or has it become business premises? If in doubt a Certificate of Lawful Use for the proposed activity, to confirm it is not a change of use and still a lawful use can be applied for.

It is suggested any policy on home working in the NNP addresses the above.

Policy NKT5: A Town Museum/Arts Centre/Tourist Information.

Comment: The amendment to a more generic policy supporting any suitable proposal that may come forward is welcomed. As worded the policy suggests that only proposals which provide all the listed uses on one site would be supported – Is this the intention or would support also be given if a proposal came forward for some, but not all, of the suggested uses? If so the policy wording may need amendment to reflect this. This policy reads more like a community aspiration than a land use planning policy and might be better expressed as a community action.

Policy NKT6: Market.

Comment: The wording of NKT6 needs further consideration to clarify what it is trying to achieve in land use planning terms. As drafted the wording gives an instruction rather than clear guidance as to how any application for a new market place would be determined. It is suggested the wording could be made more positive by stating that appropriate proposals for an enhanced market will be supported in the town centre should the existing market in the High Street be demonstrated to be unviable or that a replacement site is identified of at least equivalent standard in a suitable location.

Community Action A9: Market.

Comment: Given the success and collaborative working recently carried out to relocate the market to the High Street this community action would be more appropriately worded ‘Newmarket Town Council will work with West Suffolk Council to enhance the market experience...’

Objective B: To Improve and Promote Residents’ Health & Well-Being

Policy NKT7: Hospital site.

Comment: This policy does not add to the provisions of JDMPD Policy DM41: Community Facilities and Services and it is suggested that it is deleted. If minded to retain the policy in the submission NP it should be noted that the extent of the community hospital site does not appear to be identified on the proposals map as stated in policy NKT7.

Policy NKT8: Special educational needs provision.

Comment: the amendment to include a more generically worded policy supporting SEND provision in the town is welcomed. However this policy reads more like a community aspiration than a land use planning policy and might be better expressed as a community action.

Policy NKT9: Cinema.

Comment: A policy supporting appropriate proposals for a cinema in the Town Centre is welcomed.

Policy NKT10: Community Sports and Recreation Area.

Comment Policy NKT10 designates George Lambton Playing fields and the playing field and tennis court of the former St Felix sites as Sport and Recreational Areas. This allocation is at the time of writing in conflict with Saved Policy 5.4 of the 1995 Forest Heathy Local Plan which allocates GLPF as a business/ science park and will remain in place until such time as the Submission Draft Forest Heath District Council Site Allocations Local Plan (SALP) is adopted. However if adopted in its present form the emerging SALP does not propose to allocate the GLPF site for development at District-level, but it would remain a site in use as public open space / playing fields within the settlement boundary of Newmarket in line with NNP NKT10.

The former St Felix School site is allocated as site SA6(d) for 50 dwellings within the SALP and stipulates that provision should be made for the retention of the existing tennis courts and open space for public use with access and connectivity to George Lambton Playing Fields. The SALP site allocation SA6(d) has weight having been subject to Examinations in public. Proposed NNP NKT10 conflicts with this allocation and policy DM42 of the JDMPD as it proposes development on the existing tennis courts and open space.

However it may be possible for any future public Local Green Space/ pitch use/ sports facility to work alongside a residential redevelopment on the footprint of the St Felix school site, if policy DM42 can be satisfied and an acceptable relationship between the sites could be demonstrated. It would also be necessary to secure support for the proposed allocation from the relevant land owners in order for the proposed policy to be deliverable. It is noted that George Lambton objected to the NNP allocation in the last Pre Submission Consultation and that SCC did not have an objection in principle if the Secretary of States consent could be obtained for disposal / development of the school playing field and evidence of need and a business case could be delivered. These issues would need to be addressed to retain this allocation in the NNP.

It would be helpful if the sites allocated as Sports and Recreation Areas were annotated by the relevant policy reference on the proposals map, or on inset maps, at a scale they can be identified (1:10,000 or less). Not all the sites are shown on the proposals map and in addition those that are shown only seems to be on the proposals maps as green open space and not as Sport and Recreation Areas.

If the above issues are addressed and the policy is retained it is suggested the second sentence be reworded to state: 'A shared community sports facility is proposed on the former St Felix School site...' as the assertion that a site 'will be developed' goes beyond the remit of the NNP.

Para 7.15: This paragraph is misleading. The cited report in footnote 101 has been superseded by the West Suffolk Sports Strategy and Indoor Facilities Strategies 2016 and the West Suffolk Playing Pitch Strategy 2015. Furthermore we have no record of the report being adopted by the council and it is therefore suggested the quote is deleted. The 2015 study was undertaken using Sport England Guidelines and in relation to Newmarket found:

Football: "finding a long term facility for Newmarket Town FC, which should be addressed by the new privately funded 3G AGP development at the club site" (Complete);

Cricket: "The Severals pavilion in Newmarket is a good facility however the cricket provision (pitch quality and maintenance) is not satisfactory for a large club. Further investment in the site could improve the quality of the pitch and provide a good quality home ground for a local club". (o/s)

Rugby: “The RFU has prioritised finding a long-term home for Newmarket RFC” (complete: lease signed at Scaltback site)

In summary: “West Suffolk has sufficient provision for the current and future levels of demand for ‘playing pitch’ sports”.

Para 7.18: The table below this paragraph gives an ‘Actual figure’ of 0.65 ha of parks and gardens in Newmarket in the third column. However this contradicts para 8.14 which states the Yellow Brick Road linear park and adjacent areas is some 21ha. This disparity needs to be explained.

Policy NKT11: Local Green Spaces

The designation of **Local Green Space** within Newmarket is welcomed if supported by sound evidence (see: https://neighbourhoodplanning.org/wp-content/uploads/8-LOCALITY_NP-Green-space-HMJS-08.06.18.pdf). It is suggested the policy wording is expanded in line with the advice in section 9 of this guidance. The policy would benefit from ‘*exceptional circumstances*’ to be defined. E.g. ‘where benefits or alternative provision/mitigation outweigh the loss’ or other specific examples?

Where relevant the titles and keys of the policy maps should state ‘Local Green Spaces’ rather than ‘Open Green Spaces’ and the sites be annotated with their policy reference on the map.

George Lambton and the former St Felix School playing fields are shown on the policies map as ‘open green space’ but are not listed in policy NKT11. Given the noted shortage of public open space for informal recreation in Newmarket their allocation as Local Green Space would be supported.

Policy NKT12: New Green Spaces

Comment: Policies DM2e, DM3c, DM4c and in particular DM42 of the West Suffolk JDMPD address the need for open space in new development and therefore this policy is unnecessary repetition and should be deleted.

Objective 3: To value and protect our environment

Community Action C1: Appreciation of our Landscape.

Comment: It is within NTCs remit to provide or work with partners to provide information points which promote an appreciation of the link between the towns character, prosperity and landscape and it is suggested criteria i) is reworded to reflect this, rather than lobbying others to do so.

Policy NKT13: Trees.

Comment: A tree policy is supported. For the policy to be positively prepared it is recommend that the reference to significant surgery is deleted.

It is also suggested the specific reference to planting in playgrounds is removed as mature trees and some native species can be an issue if they are close to or overhang formal play areas/ equipment although planting is desirable in other greenspace areas.

Community Action C3: Trees

Comment: The undertaking to audit the trees in the town and establish an on-going planting programme is welcomed. NTC may wish to liaise with the Woodland Trust in this regard.

Policy NKT14: Air Quality.

Comment: See comments from the Council's Environment Officer regarding air quality and the AQMA in the West Suffolk corporate response to the Pre Sub NNP, (Appendix C). August 2018.

The last sentence of paragraph 8.5 would benefit from some context and further explanation. The table referenced in the footnote would perhaps assist.

Criteria i – to better reflect national guidance add the words 'after mitigation' to the end of this sentence.

Criteria iv – not every development will be able to demonstrate how they will achieve the actions listed in any action plan. It is suggested the words 'where applicable' are added before the word 'proposals'

Policy NKT15: Biodiversity.

Comment: The measures listed are considered to be ecological enhancements. National and District planning policy (JDMPD Policy DM12) encourages this approach and if locally this is considered to be a priority, then a policy adding further detail of appropriate measures is supported. However the wording should be carefully considered. It is suggested 'where possible' is added after 'should connect' in the first sentence of criteria c as connection to wider networks may not be possible in all locations. Any locally specific policy that goes beyond JDMPD Policy DM12 within the Newmarket Neighbourhood plan, should be supported by appropriate evidence, and NTC may wish to liaise with Suffolk Wildlife Trust and associated existing biodiversity databases from the Suffolk Biodiversity Information service in support of their policy aspirations.

Policy NKT16: Yellow Brick Road Linear Park.

Comment: A policy concerning the Yellow Brick Road is welcomed. The requirement that the YBRLP 'must be maintained in an appropriate condition' goes beyond the scope of a land use planning policy and should be deleted from NKT16 and added to Community Action C7 if NTC wish to commit to its maintenance or work in partnership or lobby etc. It is suggested the words 'where possible' are added before 'increase connectivity' in criteria (a) as connection to other areas of green space may not be possible or appropriate in all proposals.

Objective D: To develop sustainable housing within the boundary of the designated area

Community Action D1: Community Energy Initiatives

Comment: It is suggested that criteria vi is reworded to read 'encourage sensitive and appropriate energy efficient measures in traditional and historic buildings' as the retrofitting of many energy efficiency measures to historic buildings can be detrimental to their character, appearance and built fabric.

Policy NKT17: Sustainable design features to counter Newmarket-specific flood risk

Comment: This policy adds to and compliments JDMPD policy DM6 – Flooding and sustainable drainage and is welcomed.

Policy NKT18: Meeting the housing needs of Newmarket

Comment: It is noted that although Objective D of the NNP is 'To develop sustainable housing within the boundary of the Designated Area' and Opportunity 3 lists an 'increased provision of affordable

housing' as a key need to be addressed there is very little in the neighbourhood plan which deals with the delivery of new housing to meet the towns needs and no allocations are proposed to help meet this need.

The first sentence of para 9.7 suggests that affordable housing should primarily cater for people who work in the town, this precludes such groups as those who have been born and raised in the town and want to continue living in the town but that work elsewhere – is this the intention? Affordable homes are allocated to households in line with the West Suffolk Councils' Housing Allocation Policy. The policy would benefit from additional supporting text to set the context and to explain what is meant by a dwelling statement and the examples of different groups formerly in the policy added with the reason for including them. Much of the information required by this policy is already submitted either on the application form or in the supporting material when an application is submitted. West Suffolk already seek to require all new residential development to meet the National Technical standards for internal/ external space – this policy could refer to the National Technical space standards to be consistent.

It should be noted that the revised NPPF defines major residential development as 10 or more homes, or with a site area of 0.5 ha or more. It is therefore suggested the reference to '*or exceeding 1000 m2 of Gross Internal Floor area*' is deleted from criteria (b).

Policy NKT19: Affordable Housing

Comment: The amendments to this policy from the previous draft are supported and welcomed.

Community Action D3 Community Land Trust and D4 Emergency Housing

Comment: The amendments to these actions are noted and welcomed.

Policy NKT20: Design, Integration and Delivery of Infrastructure for Large-Scale Development in the Plan Area.

Comment: The wording of this policy is confused and needs careful reconsideration. The government defines a largescale major development as one where the number of residential units to be constructed is 200 or more. Where the number of residential units to be constructed is not given in the application a site area of 4 hectares or more should be used as the definition of a largescale major development. For all other uses a largescale major development is one where the floor space to be built is 10,000 square metres or more, or where the site area is 2 hectares or more.

Design codes and Masterplans are generally considered inappropriate for smaller sites of 10 dwellings or 1000m sq. and this type of site is normally dealt with by a design and access statement or development brief depending on the complexity of the proposal. Further a contextual plan would normally inform a masterplan and would be pointless if submitted at the detailed stage if a masterplan had already been approved.

The last two sentences of the policy are in contradiction. It is stated that a plan must consider means to mitigate any impact on infrastructure, but then that development will not be supported if detrimental impacts on infrastructure are found.

The issues this policy is seeking to address are dealt with by policies DM2 Creating Places – Development Principles and Local Distinctiveness, DM3 Masterplans, DM4 Development Briefs and DM22 Residential Design of the JDMPD and it is suggested the policy is deleted.

Community Actions D5 and D6.

Comment: Given the comments above it is suggested the first sentence of D5 is reworded to read 'For all proposals of 10 or more dwellings...' and D6 '... that any development of 10 or more dwellings or 1000 m2 or more of non-residential floor space outside ...'

Policy NKT21: High Speed Communication Technology

Comment: This policy is noted and welcomed.

Objective D: To Develop a Sustainable Transport Network.

NKT22: Impact of Traffic from Development Proposals

Comment: The first sentence of para 10.7 refers to horses using Newmarkets 'road network' it is acknowledged that horses do at times use the highway, but the bulk of horse movements are on the horse walks. It is suggested the current situation would be more accurately reflected if this sentence read - 'Newmarket is unique because of the number of horses using its horse walks and crossing its road network...'

The wording of NKT22 is based on the proposed wording of the 16th April Main Modification 18 to the Forest Heath SALP policy SA6B and it should be noted that this policy is still being considered by the planning inspectorate and may be subject to change. Notwithstanding this it is suggested the following amendments are made to this policy to more closely align it with the policy tested at Inquiry and ensure consistency when assessing development proposals in the town.

It is suggested 'where appropriate' is inserted within the brackets in the first sentence after 'cumulative impact'; the start of criteria ii is amended to read 'where necessary identify any measures to mitigate the individual...' and to delete criteria iii as congestion is a transport impact, so this issue is already addressed by criteria ii. To read:

'Permission will only be granted for development proposals that generate significant amounts of movement where applicants can demonstrate that the transport impact of each proposal (including cumulative impacts where appropriate) on the safety of horse movements in the town and the safety of other users of the highway, including emergency services of all types, have been assessed to:

(i) determine whether the proposal results in material adverse impacts

(ii) where necessary, to identify any measures to mitigate the individual (and, where appropriate, cumulative) transport impacts of development. Where appropriate, these measures may include contributions to upgrading horse crossings and measures to raise awareness of the special circumstances and highway safety issues in Newmarket.'

Policy NKT23: Public Right of Way Network

Comment: This new policy is noted and welcomed.

Community Actions E4 Cycling and E5 Cambridge – Newmarket Cycle Path.

Comment: The commitment to encourage cycling and work towards the improvement of facilities for cyclist is noted and welcomed.

Policy NKT24: Horse walks

Comment: This policy compliments Policy DM50 of the JDMPD and is supported and welcomed.

Policy NKT25: Railway Station.

Comment: This policy is noted and welcomed.

Policy NKT26: Bus Station.

Comment: The amendment to this policy is noted and welcomed.

Policy NKT28: Coach Park.

Comment: This site is currently leased by FHDC and licenced to Anglia Community Leisure for the use of users of the GLPF and Pavilion. Have discussions taken place with the sites owners to ascertain if the site is available and deliverable?

If this allocation results in the loss of any playing field due to displaced car parking spaces there is a potential conflict with strategic policies protecting open space designations within the FH Local plan (Policies CS13, and DM42), dependent on the extent of the loss of open space. The allocation will also need to comply with Sport England's playing field policy or meet with their exceptions policy.

If the above issues have been addressed and the site is considered justified and deliverable, the policy should be reworded to positively make an allocation e.g. 'land at ... is allocated for ...' rather than '...shall be allocated...'

The allocation would benefit from a large scale map more clearly defining the proposed site.

Policy NKT29: Enhancement and continued provision of car parks.

Comment: The amendments to this policy which have had regard to the feedback from West Suffolk's property and car parking services as the landowner are welcomed.

Community Action E10: Parking.

Comment: The wording of this community action should be carefully considered – it is beyond NTC's remit to ensure that criteria i, iii, iv and vi are implemented. Criteria (i) does not state what it is intending to 'ensure'. It is suggested this wording is reconsidered to make the make the action achievable.

Community Action 36: Taxis.

Comment: The text of para 10.23 could be expanded to explain how taxis cause pollution and the consequential loss of short term parking spaces for shoppers if these spaces are taken up by taxis etc.

Objective F: To create a vibrant, attractive town centre which enhances Newmarket as a major tourist destination

NKT30: Shop Fronts.

Comment: Shopfronts are addressed by policies DM17 and DM38 of the West Suffolk JDMP local plan document however this document was drafted before the shopfront design guide and it is not referenced in the JDMP policies. The guidance is a material consideration when determining any relevant application and the reference and support to the shopfront design guide in this policy is welcomed.

Community Action F2: Supplementary Shop Front Policy

Comment: The initiative to write a supplementary shop front policy specifically to Newmarket is welcomed if it adds a local, Newmarket specific dimension to the district wide shopfront design guide. If adequately researched, evidenced and appropriately worded the Neighbourhood Plan would be the best vehicle to bring such a policy forward and it is suggested that consideration is given to carrying out further work to do this. If NTC wish to pursue the production of a Newmarket specific guide the LPA would be happy to offer support by discussing proposed content and routes / requirements for adoption by the LPA in the future.

Community Action F3: Public Realm

Comment: The Third sentence of Para 11.7 seems incomplete or out of context as what end of the High Street it is referring to is unclear. Consideration needs to be given to the wording of the first sentence as 'ensuring' a number of the issues listed is beyond the control of NTC. This action is not realistic or achievable as drafted. "...liaise with appropriate partners to endeavour to ensure that:' or similar wording would be more appropriate.

Policy NKT31: Guineas Shopping Centre

Comment: The amalgamation of several policies dealing with different issues in this area into one comprehensive policy is welcomed. This site does not appear to be identified on the proposals map – a map at a suitable scale to be able to identify the site should be enclosed at submission stage. NTC should also be confident that all the roads listed can have an 'active' or 'outward facing' frontage given that most retail / commercial units need a service area to their rear.

Para 11.11. Should the second sentence from the semi colon read: '... the town's rate of occupancy for retail units is well above the national average... ?'

Policy NKT32: Attractive entrances to the town Page 55

Comment: The NPPF requires high quality design and gives advice on design policies in local and neighbourhood plans. At a local level, Core Strategy Policy CS5, JDMPD policies DM2 and DM22 also address design issues, and require proposals to have regard to the locality. These policies would be applied to any applications coming forward, and it is not clear how Policy NKT32 policy adds to them, or the sense of a special town expressed.

Additional Information:

In order to meet the requirements of the neighbourhood planning regulations a '**Consultation Statement**' should be submitted with the neighbourhood plan at submission stage (Regulation 15) setting out as a minimum who was consulted and how, together with the outcomes of the consultation. Planning Aid have produced advice on producing a Consultation Statement which NTC may find helpful, and this may be found on:

https://www.ourneighbourhoodplanning.org.uk/storage/resources/documents/Approaches_to_writing_a_consultation_statement1.pdf and,

https://www.ourneighbourhoodplanning.org.uk/storage/resources/documents/How_to_write_a_consultation_statement.pdf

A '**basic conditions statement**' is also required. This should set out how your neighbourhood plan meets the requirements of each basic condition and other legal tests. It will be used by both the LPA

and independent examiner to determine if your plan meets the basic conditions and can proceed to referendum. In particular, it considers whether a neighbourhood plan contributes to the achievement of sustainable development. Planning Aid have produced advice on producing a Basic Conditions Statement which you may find helpful and this can be found on:

https://www.ourneighbourhoodplanning.org.uk/storage/resources/documents/How_to_write_a_basic_conditions_statement.pdf and,

https://www.ourneighbourhoodplanning.org.uk/storage/resources/documents/Approaches_to_writing_a_basic_conditions_statement1.pdf

EU regulations: One of the basic conditions for a neighbourhood plan is that it does not breach, and is otherwise compatible with, EU obligations.

The EU regulations include:

- Directive 2001/42/EC on Strategic Environmental Assessments,
- Directive 92/43/EEC on the conservation of fauna and flora (habitats) and
- Directive 2009/147/EC on the conservation of wild birds (species).

A Strategic Environmental Assessment and Habitats Regulations Screening Opinion for the First Pre-Submission Draft NNP was consulted on from the 16th August 2018 to 21st September 2018 and completed in November 2018.

It was concluded that likely significant effects could be screened out and a Strategic Environment Assessment and Habitat Regulations Appropriate Assessment is not required. Given the scope of the policies and that there was no change in the level of growth proposed in the plan it is considered a further scoping exercise is not necessary for this document.

To meet this condition with regard to strategic environmental assessment (SEA), a neighbourhood planning group needs to have either a statement of reasons as to why SEA is not required, or, where an SEA is deemed necessary, an environmental report (and non-technical summary) which documents the findings of the SEA. A copy of the statement, or environmental report must be submitted with the neighbourhood plan proposal and made available to the independent examiner. Guidance is available at https://neighbourhoodplanning.org/wp-content/uploads/2016/09/160602-TOOLKIT_SEA_FINAL_Oct-2016.pdf

The Neighbourhood Plan should also demonstrate how it meets the Human Rights obligations.

Proposals / Policy Maps

All allocated sites should be clearly outlined with a site boundary on the policies map with a clear accompanying site allocation / policy annotation. The boundaries of sites should be easily identified and it is suggested a maximum scale of 1:10,000 is used with larger scale inset maps if necessary for smaller or more complex sites.

All maps should have a title.

Many of the policy references in the Green and Open Spaces key on the Policy Map appear to be incorrect e.g. George Lambton Playing Fields and St Felix should be referenced NKT10a rather than NKT9a.

To avoid confusion sites, constraints or facilities without a supporting policy, but that are only referenced in the supporting text should not be shown on the policies map.

Minor typographical errors and suggested amendments:

- **Para 2.5.** Amend second sentence to read ‘... area identified on the inset map below.’
- **Para 2.6 Table.** Remove working notes from actioned column of table.
- **Para 3.8.** Amend end of first sentence to read ‘... and 13 miles (21 km) east of Cambridge...’
- **Para 6.17.** In the first sentence delete the repeated ‘that’ to read ‘...-that the town was...’

DRAFT