

Regulation 16 Consultation – Draft Cheveley Neighbourhood Plan

ECDC published for consultation the draft Cheveley Neighbourhood Plan for the period 19 February to 8 April 2024. The table in this document sets out all comments received during the publication period. A total of 9 were received. Original copies of the representations are held by ECDC.

Name	Comments
Anglian Water	<p>Anglian Water is the statutory water and sewerage undertaker for the neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012.</p> <p>Overall, Anglian Water is the water and water recycling provider for over 6 million customers. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The East of England region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.</p> <p>Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.</p> <p>Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources.</p> <p>Anglian Water has produced specific guidance note on the preparation of neighbourhood plans found using this link under our Strategic Growth and Infrastructure webpage - Strategic Growth and Infrastructure (anglianwater.co.uk). The guidance also has sign posting/ links to obtaining information on relevant assets and infrastructure in map form, where relevant.</p> <p>The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water.</p> <p><u>Policy CHEV 7 - Design Considerations</u></p> <p>We are supportive of the design guidance and codes that have been developed to inform future development proposals within neighbourhood plan areas particularly those that align with our purpose and long-term strategic ambitions. These elements are particularly important in addressing components of design that deliver benefits for future occupiers, the environment and for the operation of our assets.</p> <p>We support permeable surfaces being encouraged to minimise surface water run-off from the introduction of hard-standing areas. However, clarification should be made that this does not only cover pavements but also includes areas of paving such as car parking. See under Para 9.6 'Flood Mitigation' which refers only to pavements and in places on pages 72-75 within the accompanying Design Guidance and Codes EE03- Flood Mitigation.</p>

**Anglian Water
(Cont)****Policy CHEV 9 - Flooding and Sustainable Drainage**

Anglian Water is supportive of the measures to address surface water run-off, including the preference for surface water to be managed using Sustainable Drainage Systems (SuDS) and requiring permeable surfaces for new areas of hardstanding within developments to align with the drainage hierarchy. Such measures help to avoid surface water run-off from entering our foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development.

Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure.

It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024/ 2025. However, we welcome this policy to ensure SuDS measures are incorporated within new developments, until the Schedule is formally implemented and the necessary measures are in place.

Policy CHEV 10 - Sustainable Building Practices

As a region identified as seriously water stressed, we encourage plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through rainwater/ storm water harvesting and reuse, and greywater recycling. This is highlighted in the Cheveley Design Guidelines and Codes (Figure 92 – low-carbon homes in both existing and new build conditions).

Our revised draft water resources management plan (WRMP) for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies.

The Defra [Integrated Plan for Water](#) supports the need to improve water efficiency and the Government's [Environment Improvement Plan](#) sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water would encourage this standard to be included in the neighbourhood plan using a fittings-based approach. This will help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water.

Figure 92, Bullet Point 6 should reference 'highly **water**-efficient devices' rather than "highly **waste**-efficient devices". Whilst it is acknowledged this is an anomaly in the published diagram a notation/ footnote could be used to include the correct text.

**Anglian Water
(Cont)****Policy CHEV 14 - Biodiversity Net Gain**

Anglian Water supports the policy of prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing green infrastructure. We support opportunities to maximise green infrastructure connectivity including minimising surface water run-off from existing urban areas, for example, through the creation of rain gardens. Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all AW-owned land.


As the neighbourhood plan progresses, there may also be benefit in referencing the emerging Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS) [Local Nature Recovery Strategy - Cambridgeshire & Peterborough Combined Authority \(cambridgeshirepeterborough-ca.gov.uk\)](https://www.cambridgeshirepeterborough-ca.gov.uk) as this will identify priority actions for nature and map specific areas for improving habitats for nature recovery.

Policy CHEV 15 - Local Green Spaces

This policy designates several areas of Local Green Spaces (LGS) within the neighbourhood plan area. However, there is no specific policy test in relation to development or land use proposals. The supporting text states that the development will be restricted to that which must be demonstrated as being essential for the site, in line with the 2024 version of the National Planning Policy Framework (NPPF). It should be made more explicit within the policy that development will be managed in these areas as set out in the NPPF, in order to provide the policy basis for decision-making.

Notwithstanding this, the inclusion within the supporting text that permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation is welcomed. Anglian Water may have network assets that intersect with these areas, and we do not consider that the policy should prevent any operational development that may be needed to manage, maintain or repair our assets.

Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.

<p>David Cook</p>	<p>1.10</p> <p>a) In addition to the "issues which detract from living in the parish", I request that you add:</p> <p>Parking on or near bends, which forces you to drive on the wrong side of the road where oncoming vehicles cannot be seen. With a 30mph speed limit, this is very dangerous.</p> <p>b) It might be noted that there is now a very fine Village Hall.</p> <p>10. Policy Chev 15. Local Green Space, and Page 35. Policies and Inset Maps:</p> <p>Please add the Green Space that exists at Number 5 (between Houses Nos. 4 and 6), Brook Field which is of similar size to the Green Space on the entrance to The Paddocks (shown as Chev 15-4), and includes the beautiful Oak Tree which has a Tree Protection Order currently in force (see Photo attached).</p> 
<p>Environment Agency</p>	<p>We aim to reduce flood risk, while protecting and enhancing the water environment. Due to ongoing prioritization of our limited resource, we regret that at present, we are unable to review this consultation. We must focus on influencing plans where the environmental risks and opportunities are highest. In focusing our engagement to those areas where the environmental risks are greatest, we note that based on the environmental constraints within the area, we have previously not submitted detailed comments relation to this Neighbourhood Plan. We therefore have no further detailed comments to make in relation to this plan.</p>

<p>East Cambridgeshire District Council</p>	<p>The District Council welcomes the Parish Council bringing forward this Plan, and, broadly speaking, the Plan is considered to be well presented, with clear identification of what are policies and what is wider supporting text. There are helpful use of maps and diagrams throughout.</p> <p>This letter does not comment on all matters in the Plan, but rather concentrates on those matters which we believe should be brought to the attention of the Examiner (once appointed).</p> <p>Policies CHEV 1, CHEV 5 and CHEV 16</p> <p>At the end of each of these three policies is virtually identical text which seeks the submission of a Landscape and Visual Impact Assessment.</p> <p>The District Council has no object to the ‘ask’ of such an Assessment within such paragraphs of these three policies, but it is probably not necessary (and potentially confusing) if the ‘ask’ is found in three different policies, and only very subtly different in each case. It is therefore suggested that the text be retained in Policy CHEV 1 (because proposals under CHEV 5 and CHEV 16 would automatically have to comply with CHEV 1). However, it is suggested that the Parish Council be given an opportunity by the Examiner to check whether the applicable paragraph in CHEV 1 needs any adjustment in order to enable the very similar paragraphs to be deleted from CHEV 5 and CHEV 16.</p> <p>Policy CHEV 1 – Development Strategy</p> <p>The draft Neighbourhood Plan proposes an updated Development Envelope for Cheveley village. The Plan explains at para. 5.3 that the update is to <i>“to take account of development that has taken place at Hobbs Warren and Brook Field and outstanding planning permissions adjoining the Development that have yet to be built.”</i></p> <p>The District Council is comfortable that a Neighbourhood Plan can adjust a development envelope as a matter of principle, and it raises no fundamental concerns with the adjustments as proposed in this specific Plan.</p> <p>However, two relatively minor points that may be helpfully addressed:</p>
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**East
Cambridgeshire
District Council
(cont)**

First, policy CHEV 1 refers to the development envelope “as shown on the Policies Map”. The policy is on page 13 of the Plan, but the Policies Map is towards the rear of the Plan, at pages 34-36, and there is nothing in the Policy itself, or the supporting text, to point the reader as to where the Maps can be found. It would be helpful if this could be addressed. For example, something as simple, perhaps, as amending the policy text to “as shown on the Policies Map (see pages 34-36)”.

Second, the ‘Fringe Inset Map’ (page 36) could be interpreted to mean that a small area of the Fringe has been deleted from being within the Development Envelope, this being land towards the south-west of the Fringe, but falling within Woodditton parish (and therefore out of scope for this Neighbourhood Plan). It is probably not intended to imply such as an area is to be deleted, but a reader might misinterpret the Map and reach a false conclusion that it has. It is suggested that the Fringe Map somehow makes it clear that the Development Envelope has not been amended along Duchess Drive in Woodditton parish. An extract below of the current Development Envelope as found on the ECDC Policies Map identifies the area referred to (source: https://www.eastcambs.gov.uk/sites/default/files/8_29_Newmarket_Fringe_JL.pdf):



The simple solution might be to not include the thick black line on the Fringe Map in the Neighbourhood Plan for that small stretch where the development envelope juts into the neighbouring parish?

The policy itself sets out the approach to development within and outside of the (updated) development envelope, and the approach is broadly consistent with Policy GROWTH2 of the Local Plan, and therefore the District Council raises no objection to it.

<p>East Cambridgeshire District Council (cont)</p>	<p>Chapter 6 – Housing</p> <p>This appears a well evidenced and well-presented chapter, and the District Council raises no objection to it.</p> <p>Policy CHEV 5 – Equine Related Activities</p> <p>The District Council has no objection to the principle or broad content of the Policy, other than uncertainty over what is meant by criterion (ii), which states: “<i>it would not result in the loss or erosion of settlement gaps as identified on the Policies Map</i>”. Similarly, criterion (b) in the policy refers to avoiding “diminishing gaps”. It is not apparent that such ‘gaps’ are identified on the Policies Map, so it will be unclear to a future decision taker whether or not a proposal falls within such a ‘gap’.</p> <p>Overall, and taking account the wider policies in both the Neighbourhood Plan and the Local Plan (which have the effect of controlling development outside of Development Envelopes), the two criteria are probably not necessary and could be deleted. If they are to be retained, where such gaps are needs defining more clearly, and probably requires some form of notation on the Policies Map to identify where such gaps are.</p> <p>Policy CHEV 6 – Infrastructure</p> <p>The District Council has no objection to the principle or broad content of the Policy, though in the first paragraph ‘Housing Development Envelope’ it should be just ‘Development Envelope’ (because the Development Envelope refers to the wider built environment, not just housing).</p> <p>Chapter 9 – Built Environment</p> <p>This chapter contains a number of policies, primarily around design considerations. The principle of the chapter is supported, and the District Council has no objection to it.</p> <p>Policy CHEV 14 - BNG</p> <p>The District Council has no objection to the Policy, which has been significantly updated since the previous Reg 14 draft version. However, whilst the Policy has been updated it appears the supporting text has not also been fully updated, especially para 10.6. That paragraph could helpfully be updated with the latest timing on the implementation of national mandatory BNG. The paragraph also erroneously implies that Policy CHEV 14 is similar to the District Council’s SPD.NE6, which is no longer the case. Rather than suggesting precise text for that paragraph, it would probably be helpful if the Parish Council were given the opportunity by the Examiner to suggest appropriate updated wording.</p>
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<p>East Cambridgeshire District Council (cont)</p>	<p>Policy CHEV 15 – Local Green Space</p> <p>The District Council notes the list of proposed LGS designations, and the helpful supporting document to justify them. The District Council agrees, in principle, that a Neighbourhood Plan can designated LGS sites, and it has no fundamental concern with any such proposed sites in this Plan.</p> <p>Conformity with strategic policies</p> <p>As a general comment, the Neighbourhood Plan policies appear to be broadly aligned with the strategic policies contained within the Local Plan 2015 (as amended 2023) and national policy. The District Council is therefore satisfied that the draft Neighbourhood Plan does not undermine its strategic policies and is capable of meeting the requirement for ‘general conformity’.</p> <p>Other obligations</p> <p>As set out in Submission Document 5, the District Council issued a Determination Statement in January 2024 that concluded that the District Council considers that no likely significant environmental effects will arise from implementation of the Cheveley Neighbourhood Plan.</p> <p>The District Council sees no reason why the conclusions set out in the Statement issued in January 2024 do not remain valid.</p> <p>In conclusion, ECDC considers that the Cheveley Neighbourhood Plan is capable of satisfying the basic conditions and other relevant legal obligations.</p>
<p>Historic England</p>	<p>Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p> <p>We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p>

<p>National Highways</p>	<p>National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).</p> <p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note the details of set out within the draft document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>
<p>Natural England</p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>[Please note: generic advice on neighbourhood plans was also provided by NE, and available from ECDC on request]</p>
<p>Ramblers Association</p>	<p>Introduction</p> <p>The following comments have been compiled on behalf of the Cambridge Group of the Ramblers Association, a statutory consultee for planning and development issues.</p> <p>We welcome the aims of Objective 10 in the NLP to ‘protect and enhance Cheveley Parish’s rights of way’ but are disappointed with the lack of vision for how this laudable aim is to be achieved. We note, for example, that there is no map showing the existing network of Public Rights of Way (PRoW) in the parish, nor permissive paths or permissive access, such as exists on parts of Newmarket Heath and training grounds. Such a map would show the paucity of PRoW in the parish, particularly close to Newmarket. There is a photograph of a waymark sign for the Icknield Way Trail, which passes through the parish, but no reference to the value placed on this amenity!</p> <p>The summary of earlier consultation with residents notes the demand for a safe pedestrian and cycle route between Cheveley and Newmarket; it also notes a need for signs and maps showing walking routes in the parish. However, there are no policies specifically concerned with promoting and improving opportunities for ‘active travel’.</p> <p>Policy CHEV 5: Equestrian Development. We would like to see mention of exploring opportunities to enhance the PRoW network as part of this policy. The studs cover a huge area of the parish and any significant improvement of footpaths and bridleways requires their involvement.</p>

<p>Ramblers Association (cont)</p>	<p>Policy CHEV 7: Design Considerations. There is the following statement: ‘include pedestrian and cycle links where possible to local amenities and facilities’. The Ramblers would like this to be broadened to include links to existing recreational rights of way and permissive access. It is important that such routes should meet the Highways Authority’s standards as regards width, boundary treatment etc, so as to ensure high standards of access and ease of maintenance. Wherever possible, new recreational routes should be designated as Public Rights of Way, so ensuring they continue to serve the community and are regularly maintained.</p> <p>Policy CHEV 13: Conserving & enhancing internationally-designated sites. Cheveley parish includes a wealth of very important sites and enhancing access via recreational routes is very much supported by the Ramblers. We note that in relation to mitigation measures linked to approving development reference is made as follows:</p> <p>(ii) ...improvement of existing recreational routes, and</p> <p>(iii) ...involving the provision of alternative recreational routes.</p> <p>We would like to see a further option, namely the provision of additional recreational routes.</p> <p>Conclusion</p> <p>The Ramblers would like the NLP to examine the adequacy of the current PRow network both within the parish and as it links to neighbouring parishes as a major recreational resource. This assessment would provide the basis for policies to be developed to enhance the network. We feel an opportunity has been missed to identify the major gaps in provision, especially in the northern section of the parish. The desired improvement to ‘active travel’ for pedestrians and cyclists also requires an assessment of options.</p>
<p>Turnberry on behalf of The Jockey Club</p>	<p>These representations are made in response to the Cheveley Neighbourhood Plan Submission Draft Plan January 2024, hereafter referred to as ‘the Draft Plan’.</p> <p>These representations are made on behalf of The Jockey Club (thereafter referred to as ‘TJC’), as Cheveley includes an important and significant cluster of Horse Racing Industry (HRI) activity.</p> <p>TJC welcomes the opportunity to contribute to the consultation process of the Draft Neighbourhood Plan. Whilst the Draft Plan has acknowledged that presence of the HRI in Cheveley, the TJC considers that the Draft Plan must be better aligned with East Cambridgeshire District Council Local Plan in this regard.</p> <p>Specifically, TJC requests that the Draft Plan is better aligned with the requirements of Local Plan Policy EMP6 (Development affecting the horse racing industry), which gives explicit protection to the HRI in the District.</p>

Turnberry on behalf of The Jockey Club (cont)

Horse Racing Industry

Cheveley is situated in close proximity to Newmarket which accommodates a world-leading equine cluster. The training and breeding facilities accommodated in Newmarket and surrounding area has made this part of the country the centrepiece for the UK's thoroughbred industry.

As noted in the Draft Plan, Cheveley itself accommodates a concentration of equine facilities, and thereby forms part of the Newmarket HRI cluster:

“A specific feature of the locality in this part of East Cambridgeshire, is the number of equine studs associated with the horse racing industry at Newmarket. These cover significant areas of the parish creating a regular field pattern, sometimes interspersed with public footpaths.” (Paragraph 5.2.)

“Much employment in the parish is provided by the horse racing industry in the form of commercial studs and stables. These can include riding schools, livery stables, stud farms, manèges and other equestrian enterprises which make a significant contribution to the local economy.” (Paragraph 7.1.)

Background: The Equine Cluster in Newmarket

The HRI has been present within the town of Newmarket and the surrounding area for over 350 years, since James I discovered Newmarket Heath during a hunt in 1605. An interdependent relationship between the town of Newmarket and the Racecourse stems from this centuries-long history of horse racing in the local area. Over time, Newmarket and the surrounding area has been heralded as the international headquarters of horse racing, hosting one of the largest and compact populations of thoroughbreds (i.e. home to over 3,000 horses).

The expertise accumulated over several hundred years has created a business sector worth more than £256m to the local economy and continues to present new opportunities for entrepreneurs. The horseracing industry in Newmarket and the surrounding area is directly responsible for over 3,200 jobs.

Furthermore, it should be noted that the industry as a whole is worth £4.2bn to the UK economy with Newmarket being the most significant cluster.

Meanwhile, all sectors of the industry have remained resilient and benefited from stable growth in recent years; the diverse range of equine facilities and services on offer in Newmarket have continued to be an attraction for investment from across the world, allowing Newmarket's equine cluster to continue as an example for equine clusters globally.

Turnberry on behalf of The Jockey Club (cont)

Global Significance of Newmarket to the Horse Racing Industry

Around the world, no two thoroughbred racing clusters are the same, and some are weighted towards one sector of the industry more than others. Comparable equine clusters to Newmarket include Hunter Valley in Australia and Hokkaido in Japan focus on breeding thoroughbreds; Baden-Baden in Germany is one of the most significant sales and equestrian sport hubs, and The Curragh in Ireland is a recognized centre for racing excellence, breeding, and training.

Nevertheless, Newmarket is arguably the most established in depth, complexity, and prestige. As a training centre, it has produced some of the best talent of associated industry activities, which is why high-profile and successful foreign owners and trainers choose Newmarket for their equine needs. The bloodstock trade is also one of the largest investment areas within racing, outstripping prize money, gambling and broadcast rights by a large margin. Overall, bloodstock sales at public auction at Tattersalls in 2022 was 413,187,735 guineas (£433.8 million) compared to 323,540,800 guineas (£339.7 million) in 2021

Overall, Newmarket and the surrounding area hosts the densest and most compact urban horse population in the world and needs to be recognised in this context for its special composition, which cannot be found anywhere else in the world. However, a commonality between the recognized global thoroughbred clusters is the rural character of the surrounding locality to which they pertain – a landscape and development characteristic that often can be, yet should not be, overlooked by planning decisions and policy. This pseudo rural array of paddocks, stud farms and horseways is central to the vitality of these equine clusters as it represents the facilities and land needed for successful thoroughbred activities. These characteristics must be preserved and protected by strategic planning decisions, moving forward.

The Equine Cluster and Key Considerations for the Cheveley Neighbourhood Plan

The growth figures and industry analysis highlighted above demonstrate the economic importance of the HRI. However, it also indicates the importance of maintaining the industry. As noted, reputation alone cannot maintain the HRI's vitality in the local area; appropriate local policy will be pivotal in maintaining Newmarket's significance as a global headquarters for the horse racing industry. Opportunities for further growth need to be recognised and nurtured, while both national and international threats to the industry need to be prevented from stunting the HRI's success.

Given the above, key stakeholders within the horse racing industry, are keen to support local decision makers in directing growth in ways that meet local needs and preserve local success.

<p>Turnberry on behalf of The Jockey Club (cont)</p>	<p>Draft Plan – Chapter 7: Equine Activities</p> <p>TJC welcomes and supports that the Draft Plan acknowledges that equine activities are a key industry within Cheveley Parish through Objective 4 (Employment): “Enable the various equine related industries which are prevalent in the parish <u>to prosper and thrive</u>” (emphasis added).</p> <p>Chapter Seven of the Draft Plan is specifically concerned with equine activity and includes Policy CHEV 5 (Equine Related Activities outside the Development Envelope). This reflects and supplements Local Plan Policy EMP3 (New employment development in the countryside) and Policy EMP5 (Equine Development).</p> <p>This Chapter also lists the key Local Plan policies relevant to equine activities: EMP2, 3, 5 and 9. Chapter Seven briefly mentions EMP6 (in paragraph 7.3), acknowledging that the Local Plan sets up measures to protect equine activities from inappropriate development. However, the Neighbourhood Plan does not build upon this, and does not refer to this as a key Local Plan policy.</p> <p>Conformity with the Local Plan – Strategic Policy EMP6</p> <p>The Cheveley Neighbourhood Plan must be in ‘general conformity’ with the strategic policies of East Cambridge Local Plan. Paragraph 7.5. of the Neighbourhood Plan states:</p> <p><i>“The Neighbourhood Plan does not contradict the Local Plan approach, rather it provides further considerations that will ensure proposals in the parish have regard to the local characteristics.”</i></p> <p>The East Cambridgeshire Local Plan (revised 2023) outlines equine development as being a fundamental industry in East Cambridgeshire;</p> <p><i>“Given the historical association of the Newmarket area with horse racing, and its importance to the local economy, it is important that development does not have an adverse impact on the industry. Development which harms the long-term viability of operational studs and other racing facilities, or the racing industry as a whole, will be resisted.”</i></p> <p>Policy EMP6 (Development affecting the horse racing industry) states as follows:</p> <p><i>“Any development which is likely to have an adverse impact on the operational use of an existing site within the horse racing industry, or which would threaten the long term viability of the horse racing industry as a whole, will not be permitted.”</i></p>
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<p>Turnberry on behalf of The Jockey Club (cont)</p>	<p>Policy EMP6 very clearly seeks to safeguard horse racing industry’s activities from loss and adverse impacts. Policy EMP6 is a strategically important policy, critical to the long term viability of the HRI, and its continued contribution to local economic activity and employment. Policy EMP6 is thereby considered by TJC to be a ‘strategic policy’, to which the Neighbourhood Plan must be in ‘general conformity’.</p> <p>Whilst the Draft Plan recognises the importance of equine activities in Cheveley, and includes an objective which supports this, the Draft Plan does not explicitly acknowledge that Policy EMP6 is a strategic policy and does not demonstrate how this strategic policy will be implemented through the Neighbourhood Plan.</p> <p>This lack of clarification appears inconsistent with the objectives of the Neighbourhood Plan, which recognises the importance and significance of the equine activities in Cheveley for the HRI more broadly.</p> <p>TJC requests that amendments are made to the Cheveley Neighbourhood Plan to explicitly confirm that Local Plan Policy EMP6 is a ‘strategic policy’, which take precedents over Neighbourhood Plan policy.</p> <p>Clarity of how the Local Plan’s policy will be implemented within Cheveley is considered to be an important planning matter due to social and economic importance of the Horse Racing Industry within Cheveley.</p> <p>This amendment is considered to wholly within the scope of the Regulations, which require Neighbourhood Plans to be in general conformity with the strategic policies of Local Plan.</p> <p>TJC appreciates the opportunity to contribute to the Neighbourhood Plan and looks forward to seeing these amendments incorporated into the Plan.</p>
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