

## Representations made within Regulation 14 Public Consultation

There were 5 representations from residents, 12 from statutory consultees and 5 from Local landowners or developers, making 22 representations in total. These are shown in Table 1 below.

**Table 1: Respondents to Regulation 14 Consultation**

Consultee	ID	Consultee Type
Resident 1 (Name withheld)	R1	RES
Residents 2 (Names withheld)	R2	RES
Resident 3 (Name withheld)	R3	RES
Resident 4 (Name withheld)	R4	RES
Resident 5 (Name withheld)	R5	RES
West Suffolk CCG	S1	SC
Highways England	S2	SC
Sport England	S3	SC
Natural England	S4	SC
Alpheton Parish Council	S5	SC
National Grid Group	S6	SC
Anglian Water	S7	SC
Historic England	S8	SC
The Environment Agency	S9	SC
Babergh District Council (BDC)	S10	SC
BDC (Strategic Housing)	S11	SC
Suffolk County Council (SCC)	S12	SC
Rose Builders	L1	LD
Local Landowner (Name withheld)	L2	LD
Melford Hall Estates / Hill Group	L3	LD
Gladman Developments Ltd	L4	LD
The Hamilton Charity	L5	LD

Table 1 Key	
RES	Resident of Long Melford
SC	Statutory Consultee
LD	Landowner/Developer

The actual representations from the 22 respondents are summarised in Table 2 below, along with the response to each representation from the Neighbourhood Plan Steering Group (NPSG).

See the Key below for confirmation of the relevant Plan sections in Table 2 and see Table 1 to identify each respondent.

Table 2 Key	
<b>Plan Document Sections</b>	
Gen	General (Covers chapters 1-3 of LMNP: (1) Introduction, (2) The Neighbourhood and (3) Characteristics & Vision)
SG&H	Sustainable Growth & Housing (Chapter 4 of LMNP)
T&P	Traffic & Parking (Chapter 5 of LMNP)
VS&F	Village Services & Facilities (Chapter 6 of LMNP)
B&T	Business & Tourism (Chapter 7 of LMNP)
INP	Implementation of Neighbourhood Plan (Chapter 8 of LMNP)
<b>ID</b>	
For the identity (ID) of respondents and the classification of ID types, please see Table 1.	

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
B&T	R1(I)	Concern on restricting change of use of shops in context of decline in retailing and need for asset to support retirement.	Shops in Long Melford (LM) are generally independent and their fortunes tend to follow those of their owners rather than general retail trends; many of the shops are also specialist or niche shops which are often a destination for a leisure outing rather than a utilitarian retail service. They are also an important part of the LM offer for visitors. If residents want local shops and other services, they need visitors to help maintain their viability. Policy LM-B3 (now LM 25) is designed to allow a period in which new owners/operators can come forward before a change of use is allowed.
T&P	R1(II)	Introduce parking restrictions at entrance to Orchard Brook to reduce risk of accidents.	Power rests with SCC, who will need to see evidence of danger e.g. accidents. Separate action by Parish Council (PC) to improve parking in village. (Note: PC advised yellow lines to be added).
SG&H	R2	Neighbourhood Plan (NP) should take account of planning application for 122 homes on Stafford Park, especially scale and impact on services and highways in LM.	Application refused by Braintree District Council against officers' recommendation. No Appeal lodged.
Gen	R3	Support for NP and conclusions.	Noted
Gen	R4	On heritage, landscape and views, wishes NP to support expansion of Dedham Vale and Stour Valley Area of Outstanding Natural Beauty (AONB). Also advocated extension of protection to land between LM and Lavenham and land between Melford Walk and A134 bypass.	By implication we support this but don't think it is our place to demonstrate active role in promoting the extension proposals.

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		On housing and business development advocates support for microbusinesses with short term pressure to build housing not to be at expense of building local economy.	Point accepted. Business Policy LM-B1 (now LM 23) extends to micro-business support and Housing Policy LM-H5 (now LM 5) will include good quality space for small businesses in a mixed use site.
		On intention to protect 'local green space' between LM and A134 bypass (now re-named' Rural Gap'), wished to see this extended to all land between Melford Walk and A134.	LGS Policy reviewed in accordance with NPPF and changed to Rural Gap Policy (LM 14). Recognised this could not be a comprehensive or excessive bar to development.
		On implementation of the NP, recommended Plan included review in light of emerging Babergh & Mid Suffolk District Councils (BMSDC) Joint Local Plan (JLP), seeking balance between residential housing and accommodating micro-business.	NP will be reviewed at 2 year intervals. Reg 15 submission document updated fully to fit with emerging JLP.
Gen	R5	Advocated PC take closer look at pedestrian safety, especially home to school routes and pedestrian refuge in road near Roman Way. Better shelters at well used bus stops to encourage public transport. Also wished to see continuous strategic cycleway/footpath between LM and neighbouring villages.	Noted. PC is seeking pedestrian refuges on Hall St and Station Rd via consultation with SCC and Station Rd developer. T&P section of NP includes Community Objective which looks closely at improving pedestrian safety. Also NP has Policy LM 22 on Protection and Enhancement of Public Rights of Way and Community Objective LMCO 10 on Promotion of Public Rights of Way. Both cover walking and cycling.
VS&F	S1	Appreciate work in NP & issues at GP surgery; large developments better for CIL/s.106; willing to meet NP team to examine way forward.	NPSG met twice with CCG and Surgery – See Statement of Consultation. Surgery has no plans to expand. NP added LMCO 3 on supporting surgery to expand when time right.

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Plan Section	ID	Representation	NPSG Response
Gen	S2	No strategic impact from NP on highways. Indication that sustainable development difficult to achieve in a rural village; scale of development modest: highways impact should be identified and mitigated in Local Plans	Noted
VS&F	S3	Need to check compliance with NPPF paras 97-99 and also check if BDC has a strategy for sports facilities; Sport England has much guidance and advice on provision of appropriate sports facilities.	Prior to Reg 15 submission Policy LM 19 added which includes protection of key open spaces for sports and recreation.
Gen	S4	Natural England does not have any specific comments on this draft neighbourhood plan.	Noted
Gen	S5	No objection to NP.	Noted
SG&H	S6	Gas and electricity, concern is to protect distribution networks. One high-pressure gas pipe runs through parish but is not affected by development sites; links provided checking other assets.	Noted. Gas infrastructure has been identified in site assessment.
SG&H	S7	Sewers and water supply pipes run through parts of sites A1, L1, F1 and K1; need provisions to protect access to them in any development scheme. Policy and supporting text suggested. Generally provide for sustainable foul and surface water sewerage, but no need to duplicate provisions of Local Plan.	<p>Policies LM-H3 (now LM 3), LM-H4(now LM 4), LM-H6 (now LM 6) and LM-H7 all updated as follows:</p> <p>‘There is an existing sewer and water main in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take this into account.’</p> <p>Policy justification also updated in each case.</p> <p>Specific flood risk Policy also introduced (LM 12).</p>
Gen	S8	Supportive of concern for historic environment in NP; Strategic Environmental Assessment (SEA) likely to be needed. See Historic England Guidance on incorporating historic environment considerations into an NP, link provided.	Heritage considerations a constant throughout the NP with reference to BMSDC Heritage Sensitivity Analysis, especially in relation to Sustainable Growth & Housing Policies.

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Plan Section	ID	Representation	NPSG Response
SG&H, VS&F.	S9	<p>Natural Capital Studies have shown that natural capital assets such as green corridors and green amenity spaces are important in climate change adaptation, flood risk management, increasing biodiversity and for human health and well-being. An overarching strategic framework should be followed to ensure that existing amenities are retained as well as enhancements made and new assets created wherever possible.</p> <p>We are pleased to see within the Plan, Policy LM-H15–Local Green Space.</p> <p>The designation of ‘local green spaces’ is an important method of protecting natural capital assets. We recommend the protection of these spaces, and encourage enhancements to be made to them to help support biodiversity and varied habitats that will help improve the ecological footprint of any development locations in the parish. And so whilst we welcome the two policies LM-V2 and LM-V3 relating to public open spaces, through protecting existing and incorporating provision of new green spaces within future developments, we consider the plan would be improved with a focus and further elaboration to develop on these policy objectives with specifics of how they will be delivered.</p> <p>Designating green spaces is a positive approach, but through improving existing spaces and incorporating native species and varied habitats into</p>	<p>SEA has been provided and anticipated a minor positive effect from the NP in relation to the historic environment, ‘ on the basis that the plan’s policies are considered to adequately mitigate potential risks to the historic environment at sensitive site allocations.’</p> <p>Policy LH-15 adapted as a result of Reg 14 feedback to better conform with NPPF in the form of a ‘Rural Gap’ Policy.</p> <p>Then a new more focused ‘Local Green Space’ Policy created (LM 19) for the designation of identified public, green and recreational spaces. This in addition to a Policy on provision of new green spaces.</p> <p>Specific Policy on Encouraging Biodiversity (on new developments) introduced to NP (LM 13)</p>

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		<p>designs of new areas will encourage net gains in biodiversity and wildlife links/corridors and deliver the best possible environmental outcomes. Enhancement to existing habitats should where possible feature within any conservation plans in development, and the National Planning Policy Framework paragraph 170, sub section d) states planning policies and decisions should contribute to and enhance the natural and local environment by: ‘minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures’.</p>	<p>and Community Objectives (LMCO 6 &amp; 7) to promote biodiversity and to reduce carbon emission. NPSG ‘sponsored’ Biodiversity Working Group set up to work with BDC on areas like green corridors and the provision of new trees.</p>
		<p>Specific point re pond attached to Site K1 (Policy LM-H6, now LM 6)</p>	<p>Policy wording adapted so development proposals include enhancement of natural capital of the common land....and pond on the site..’</p>
		<p>On flood risk, ‘Our data maps show that the designated Main Rivers; River Stour, River Glem and the Chad Brook all flow through the Parish and areas within Long Melford Parish fall within Flood Zone 2 and 3 as defined by the Planning Practice Guidance. We note that the Plan proposes a number of site allocations for built development, and whilst the majority appear to have been sequentially sited outside of the flood zone areas, Policy LM-H5, site allocation D1, Land in Borley Road is located within flood zones 2 and 3 that fall in small areas within the site boundary. Section 4.37 ‘Justification for Policy LM-H5’ states the site is outside Flood Zones 2 and 3. However, from the site boundary shown in Map 4E our data maps actually show small flood zone sections overlapping the boundary to the north-west and south-west areas. The sequential approach should be applied to this site allocation for any development applications submitted.’</p>	<p>This advice also cross references with representations from BDC and Suffolk County Council (SCC). As a result, specific Policy introduced ‘Addressing Flood Risk’ (LM 12) and Policy LM-H5 (now LM 5) adapted for this combined guidance, with ‘Justification’ amended in regard to sequential approach. (see paragraph 4.62 of NP).</p>
		<p>The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it isn’t possible to</p>	

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		<p>locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. All future development proposals within the Fluvial Flood Zone of the River Stour and its tributaries (which includes Flood Zones 2 and 3, as defined by us), or elsewhere outside Flood Zones 2 and 3 involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment (FRA). For any other minor development extensions that may be proposed over the plan-period, that fall within flood zones 2 or 3, our Flood Risk Standing Advice should be followed.</p>	
		<p>On contaminated land: For land that may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with any planning application to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model and initial assessment of risk), and provide assurance that the risk to the water environment is fully understood and can be addressed through appropriate measures. This is because Long Melford Parish is in groundwater source protection zones 1, 2 and 3, as well as on a principal Bedrock Aquifer. For any planning application the prior use should be checked to ensure there is no risk of contamination.</p>	<p>Policy LM-H5 (now LM 5) in respect of site D1 amended to reflect this guidance.</p>
<p><b>BDC Representations begin at this point</b></p>			
Gen	S10(I)	<p>Generally, the Long Melford Neighbourhood Plan (LMNP) is positively prepared. However, many of the policies need re-drafting as set out further below.</p> <ul style="list-style-type: none"> <li>• The Plan needs to include a Policies Map.</li> </ul>	<p>BDC guidance carefully considered and substantially followed in response to positive reception from NP Steering Group. Where view has differed NPSG has typically referred back to BDC.</p> <p>Policies Map added.</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

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		<ul style="list-style-type: none"> <li>We ask that the policy numbering be simplified so that all have the 'LM' prefix and are then numbered sequentially, e.g. LM1, LM2, LM3 etc. (rather than LM-H1 etc). This will greatly assist us in the identification and use of these policies for development management purposes.</li> <li>The overall level of growth proposed seems appropriate given local heritage and environmental constraints. However, previous developments (e.g. Bull Lane) met earlier identified need and should not all be counted towards future growth.</li> </ul>	<p>Policy numbering amended to conform with BDC request.</p> <p>Only developments/units with planning permission or under construction counted, after the commencement date of NP in 2018.</p>
		Heritage Team colleagues note that, while site allocation policies mention the constraints of the Conservation Area, no reference is made to the listed buildings or their settings, or any relevant Scheduled Ancient Monuments.	All 33 sites assessed for their impact on listed buildings and Ancient Monuments – See Appendix 3 of NP.
Gen	S10(II)	1.5 Suggest last sentence read: <i>“Babergh and Mid Suffolk District Councils are currently working on an updated Joint Local Plan.”</i>	JLP has moved on. Text in 1.5 now amended: ‘The Neighbourhood Plan has been prepared in general conformity with the strategic policies in the Draft JLP.’
Gen	S10(III)	1.10 The Joint Local Plan period will be (1 April) 2018 to (31 March) 2036. We suggest that the LMNP use the same period. If 2019 - 2036 is used, this would be a 17-year period	Plan Period amended: 2018-2036. However since this representation BDC has requested change to 2018 – 2037.
Gen	S10(IV)	1.17 Stage of Plan: This section will need updating each time the LMNP moves from stage to stage.	Para.s 1.18 & 1.19 updated for this.
Gen	S10(V)	2.3 in Ch 2, requested confirmation that LM is within ‘Project Area’ of AONB, not the Area itself.	Para. 2.3 amended.
Gen/ SG&H/ VS&F	S10(VI)	3.7 in Ch 3 Local Green Space is a specific designation as set out in para’s 99 and 100 of the NPPF. We therefore suggest that this sentence be deleted. A settlement boundary policy should protect the area surrounding the village.	Para 3.7 amended and Built Up Area Boundary (BUAB) included in Policy LM 1 within Ch 4, SG&H.

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Gen	S10(VII)	3.15 Qstn: Is there any specific evidence that shows that higher house prices are a result of growth?  Growth can also help to sustain services and facilities (this is recognised later in the Plan at paragraph 4.16).	Para.s 3.15 and 3.16 on growth duly amended to reflect this guidance.
Gen	S10(VIII)	3.19 Clarification is required on the definition of heritage assets and what is meant by ‘historic private houses’. The definition provided appears to contradict itself in the same paragraph stating that they ‘are open to visitors’, which is not the case for all heritage assets. Presumably the reference is to Kentwell and Melford Hall.	Para 3.19 amended to reflect this guidance.
Gen	S10(IX)	3.20 The last sentence refers to ‘off-road’ routes. Would it be better to refer to ‘non-motorised off-road routes’?	Para 3.20 amended to reflect this guidance.
Gen	S10(X)	3.27 “secure our valuable natural environment” – We previously advised that the use of green spaces for recreational use and enjoyment may be in conflict with maintaining green space for their natural environment. We suggested these could appear as separate objectives.	Core objectives at para 3.27 amended to reflect this advice.
Gen	S10(XI)	3.27 Character and atmosphere’ referred to in point d) would perhaps relate better to point a) where reference is made to protecting and enhancing heritage assets. Amenities in point d) should be a separate point.	Prefer to keep these objectives distinct as heritage is a key factor in the village but LMPC is carrying out specific initiatives with regard to the village centre and its amenities, character and atmosphere. Eg. LM in Bloom and control of fly-posting.
SG&H	S10(XII)	4.11 The advice from Locality is that the proposed approach to ‘design issues’ can only be addressed through the group modifying the LMNP at a later stage, i.e., it / they cannot do this via a Supplementary Planning Guidance document (SPD). In reality that would also mean repeating the process from this Reg 14 Pre-submission stage through to Independent Examination and, dependent on whether the modification is seen as ‘major’ or ‘minor’, the	Generally accepted. The options appear to be: a review of the NP involving Reg 14 onwards or Supplementary Planning Guidance adopted by BDC. LMPC likely to have more control over the former.

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		<p>possibility of a second local referendum. [NB: Locality currently offer a Design Codes technical support package that the Group may be eligible for] .</p> <p>It would, however, be possible for the District Council to adopt design guidance as an SPD.</p>	<p>Para 4.11 amended to reflect this guidance.</p>
SG&H	S10(XIII)	<p>4.14 The situation has moved on somewhat since last October’s draft document and only 4.14 sub-paragraph 3 is now relevant. The rest can be deleted.</p> <p>It is still unclear if these figures take into account Long Melford’s role as a Core Village.. Nevertheless, the level of growth proposed may be appropriate given the heritage and environmental constraints.</p>	<p>This guidance on housing need superseded by JLP and para. 4.14 updated to reflect JLP Reg 19 document and also NPPF Para 9.</p>
SG&H	S10(XIV)	<p>4.17 Capacity is not the same as existing commitments, and is determined by a variety of factors. The first sentence should read “Existing commitments and the potential for additional sites are now examined”</p> <p>Any completions at base date would not count towards the provision during the plan period.</p>	<p>Para 4.17 now adapted for changing circumstances and JLP Reg 19 document. No completions at base date counted towards provision during plan period.</p>
SG&H	S10(XV)	<p>4.25, 4<sup>th</sup> bullet It may be better to refer to this 'a physical separation' between settlements rather than 'Local Green Space' in view of the particular NPPF definition. (See also comments under 3.7 above).</p>	<p>Now para. 4.27. Amended as 'Rural Gap'.</p>
SG&H	S10(XVI)	<p>4.26 May be useful to identify where “Skylark Fields” is.</p> <p>Qstn: What is the evidence to support this and how does this link to the suggestion that part of the site should be allocated?</p>	<p>Now para 4.28. Amended to show outline permission now granted for 150 houses on Station Rd (Skylarks site)</p>
SG&H	S10(XVII)	<p>4.30 (map 4a) BMSDC’s Heritage Team have expressed major concerns over the following sites:</p> <p>Q1, K1, H8, H1, H7, H6, H10, A1, L1, R1, G1, H9, J1, P1, C2, H4, SS1028</p>	<p>NPSG response: On 13 of these sites, no development is proposed. Development is proposed on the following sites, subject to satisfactory safeguarding of heritage interests:</p>

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		<ul style="list-style-type: none"> <li>• <i>Development in these locations could result in a high level of less than substantial harm to the designated heritage assets and therefore all aspects of the proposal would be of concern i.e. location, scale, massing, density, articulation, detailed design etc.</i></li> </ul>	<ul style="list-style-type: none"> <li>• K1; the policy has been amended to further protect the heritage value and to set out the public benefits of the proposal (in accordance with NPPF para 196).</li> <li>• A1, L1 and G1 are all small sites within the Conservation Area; the relevant policies take account of the heritage value of the location. In the first two cases it is intended that the future development will be more sympathetic to the Conservation Area than the present uses and buildings.</li> </ul>
			<p>These Policies (now LM 6, LM 4, LM 3 and LM 2) all adapted to show ‘minimal detrimental impact on conservation area’ (and, for K1 ‘...on Kentwell grounds’).</p>
			<p>Argument made under ‘Justification’ that sites L1 and A1, as they are, have buildings that are detrimental to conservation area.</p>
			<p>With K1 para. 4.71 now added as follows: ‘In the terms of NPPF 2019 para 196 it is unlikely that this proposed development would cause even ‘less than substantial harm’ to the Kentwell heritage asset; if it did, it is considered that the benefit of affordable homes on this scale and for local people, together with the provision of a public</p>

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		<ul style="list-style-type: none"> <li>The Heritage Team has less concern over the following sites: H5, W1, W2, F1, SS0557</li> </ul> <p><i>Development in these locations could result in less than substantial harm to the designated heritage assets and proposals would therefore be primarily subject to scale, density and location</i></p> <ul style="list-style-type: none"> <li>The Heritage Team has a very limited concern over the following sites: N1, H2, C3, F2, M1, D1, S1, H3, C1, SS0811, SS0967</li> </ul> <p><i>Development in these locations would probably result in a negligible level of harm to the designated heritage assets.</i></p>	<p>recreational facility outweighs any less than substantial harm. ‘</p> <p>With F1, comment noted re ‘less concern’ of Heritage Team. Also policy LM – H7 (now LM 7) provides for the proximity of the site to the site of A Roman Villa, an ancient monument, to be taken into account in the design of the scheme.</p> <p>With D1, comment of Heritage Team noted.</p> <p>All sites also reviewed within SEA from historic impact perspective and ‘minor positive impact’ envisaged.</p>
SG&H	S10(XVIII)	4.31, lines 7 & 8 May be better just to allocate the site for affordable housing. Exception sites are sites that are not allocated. Cross reference to LM-H6.	Now para. 4.33. Amended to reflect this guidance. (LM-H6 is now LM 6).
SG&H	S10(XIX)	4.32 Qstn: Where is the evidence to support the statement that development of a small part of C1 is acceptable?	Now para. 4.34. Amended to: ‘The third site (C1) is a small part of the proposed development in Station Road, where the owner was unwilling to consider a scale and nature of development that might be acceptable in the Plan.’
SG&H	S10(XX)	LM-H1: As currently worded, this is a statement rather than a planning policy.	Now Policy LM 1. Amended to fully reflect this guidance and also to incorporate BUAB.
		It is a given that development will be in accordance with the Joint Local Plan and NP. It would be better if this first policy in the NP were re-worded along the following lines:	

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		<p><i>“This Plan provides for around xx dwellings to be developed in the Neighbourhood Plan area between 2018 and 2036. This growth will be met through:</i></p> <p><i>i. the allocation of the following sites as identified in separate policies in the Plan and on the Policies Map:</i></p> <p><i>Site 1 (name and NP policy number)</i> <i>Site 2, (name etc. etc.)</i></p> <p><i>ii. small “windfall” sites and infill plots of one or two dwellings within the Built-Up Area Boundary that come forward during the plan period and are not identified in the Plan; and</i></p> <p><i>iii. conversions and new development opportunities outside the Built-Up Area Boundary in accordance with paragraph 79 of the NPPF.”</i></p>	
SG&H	S10(XXI) –  See also S12(X)	<p>LM-H2 (Spicers Lane) The first paragraph is reasoned justification, and not planning policy.</p> <p>Normally we would not allocate sites for single dwellings as they could come forward through the normal development management process as a site within the BUAB. IT is also not appropriate to provide for a personal consent through planning policy. This can only be done through the development management process and a planning agreement. If it is to be kept as an allocation the Policy should be reworded as follows:</p> <p><i>“Land at Spicers Lane as identified on the Policies Map is allocated for the development of a single dwelling subject to there being:</i></p> <p><i>i. No detrimental impact on the conservation area</i> <i>ii. No detrimental impact on neighbouring properties</i></p>	Now Policy LM 2. Amended to reflect this guidance.

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		<i>Satisfactory access”</i>	
SG&H	S10(XXII) –  See also S12(XI)  See also L3(II)	LM-H3 Cordell Road. Much of this is reasoned justification rather than planning policy.  If the site is to be allocated the NP should make the case for the change of use from employment rather than leave it to be dealt with at the planning application stage. The NP would need to be supported by evidence that employment is not viable and meets the tests set out in Local Plan policy EM24. We also remind you that the adjacent site was very controversial due to concerns about traffic along Cordell Road.  If the site is to be retained as an allocation in the NP, the Policy should be reworded along the lines suggested for LM-H2 above.	Now Policy LM 3. Amended to reflect this guidance and reworded as suggested. Justification amplified in Para.s 4.48. & 4.49.
SG&H	S10(XXIII) –  See also S12(XI)  See also L3(II)	LM-H4 Rear of Bull Hotel The same comments as for LM-H3 around reasoned justification apply.  This is a sensitive location and is constrained in terms of highways, parking and access. Again, a loss of employment site.  If the site is to be retained as an allocation in the NP, the Policy should be reworded along the lines suggested for LM-H2 above.	Now Policy LM 4. Amended to reflect this guidance. Justification amplified in Para.s 4.55. & 4.56.
SG&H	S10(XXIV)  See also S12(XII)  See also L3(II)	LM-H5 (Borley Road) The same comments as for LM-H3 around reasoned justification apply. Also:  <ul style="list-style-type: none"> <li>• Flooding might also be an issue here.</li> <li>• Seems to develop the village in an odd direction. Poorly located to village centre.</li> <li>• Highway concerns, incl’ lack of existing footways and road safety issues.</li> </ul>	Now Policy LM 5. Guidance accepted. The policy has been amended to:  <ul style="list-style-type: none"> <li>• Take justification out of policy.</li> <li>• Change the allocation to mixed use, employment and housing.</li> </ul>

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		<p>If the site is to be retained as an allocation in the NP, the Policy should be reworded along the lines suggested for LM-H2 above.</p>	<ul style="list-style-type: none"> <li>Extend the site which then allows pedestrian access to Ropers Lane and Rodbridge Hill (bus service).</li> <li>Explain the very limited risk of flooding at the site.</li> </ul>
SG&H	<p>S10(XXV) –</p> <p>See also S11(I) and S12(XIII) And L5</p>	<p>LM-H6 (Land W of High Street) The same comments as for LM-H3 around reasoned justification apply. See also our comments against 4.30 above.</p> <p>This is a very sensitive location and BMSDC’s Heritage Team place this site in the category of ‘major concern’ where development in [this] location could result in a high level of less than substantial harm to the designated heritage assets and therefore all aspects of the proposal would be of concern i.e. location, scale, massing, density, articulation, detailed design etc. In this instance, perhaps a linear development addressing the street could be considered, due to the morphology of the historic development throughout the village. It also stands on the outer periphery of the village and so a gentle approach into the built-up area should be maintained, rather than a large housing development which would appear largely atypical. A green buffer to the western boundary should be maintained between potential development to the east of the site and the designated park and garden of Kentwell Hall to the west, as well as referencing the former allotment gardens evident on historic OS maps.</p> <p>If this site is allocated in the NP it is not an exception site. If the scheme is to meet local housing needs then it may be better not to allocate the site and deal with this through the rural exception policy. Highways concerns would also need to be addressed, e.g. lack of footways on either side of the carriageway.</p>	<p>Now Policy LM 6. Guidance accepted. The Policy has been amended to:</p> <ul style="list-style-type: none"> <li>Give greater attention to the heritage issue.</li> <li>Weighing the possible less than substantial harm against the public benefits.</li> <li>Allocate the site, not let it come forward as an exception site.</li> <li>Re-word it (justification vs policy).</li> </ul> <p>Whilst the notion of a linear development on the road frontage might have merit, it would represent a waste of a valuable site which is, uniquely in Long Melford, viable and appropriate for affordable housing. Furthermore the housing on the west side of High Street does not display a clear linear pattern, housing being set back at differing distances from the road.</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		If the site is to be retained as an allocation in the NP, the Policy should be reworded along the lines suggested for LM-H2 above and also reflecting the need to take into account both heritage constraints.	Policy no longer views this as a Rural Exception Site.
SG&H	S10(XXVI)  See also S12(XIV)	LM-H7 (.. opp Ropers Lane) As worded, this is a mixture of reasoned justification, policy and context. See also our comment above under 4.11 re 'design stage'.  The Policy should be reworded along the lines suggested for LM-H2 above. See also heritage comments referred to under 4.30 above.	Now Policy LM 7. Policy has been amended to: 'Take justification out of Policy'.  Policy adapted in preparation for Reg 15 submission to reflect new Policy on 'Less expensive market housing'. Also adapted to include 15% of site for allotments.
SG&H	S10(XXVII)	LM-H8 This is a statement and not a policy. It should therefore be included as part of the text of the Plan rather than a policy	This Policy has been removed and a revised Policy (LM 15) has been added, on "Mitigating development impact". This refers to the expansion of Sudbury and a requirement that any part of this expansion in LM parish should lead to appropriate payments of s106 or CIL money. See also Policy LM 14 on 'Protection of Rural Gap'.
SG&H	S10(XXVIII)	LM-H9 This is a mixture of statement and policy. The part of the site that the Parish Council supports should form a proper allocation. It would then be clear which part of the site was considered suitable for development.	This policy has been deleted, as there was no agreement with the landowner (or Gladman Developments Ltd) about the site being brought forward for development.
SG&H	S10(XXIX)	LM-H10 As drafted, this policy appears to be trying to do a number of things which results in confusion, i.e., the policy should be more specific in its requirements. In particular: <ul style="list-style-type: none"> <li>The first three para's read as preamble. The policy itself starts at the fourth para' with the words "All proposals ...".</li> </ul>	Now Policy LM 8.  Agree partly with preamble comment.

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		<ul style="list-style-type: none"> <li>It may be best to omit the third paragraph altogether given that this is at odds with allocations made elsewhere. The Supporting text at 4.44 also discusses a desire for max 20 unit schemes.</li> <li>Delete the reference to the 'CS11 Checklist' as this may be time limited. It is better for the LMNP to set out its own checklist.</li> <li>The requirements of this policy could be viewed as being too onerous. The level of supporting information required should be proportionate to the scale of development proposed.</li> </ul> <p>The last paragraph should refer to <i>"major developments"</i> rather than <i>"all developments."</i></p>	<p>Agree about conflict with size of sites allocated. Policy changed to embrace schemes up to 40 units. (Note changed subsequently to a max of 30 units to fit in with evidence from Residents Survey and preference of Parish Council).</p> <p>Agree that obligations should be simplified, especially as we are focusing on smaller schemes.</p> <p>Changed to 'major developments': 10 units or more according to NPPF.</p> <p>Policy changed accordingly. Justification also revised.</p>
SG&H	S10(XXX) – See also S11(II)	LM-H11 Needs to be in line with NPPF and include reference to sites of 0.5 ha or more (irrespective of no. of units). Note also that this policy may not be necessary if it duplicates NPPF or (Joint) Local Plan policy.	Now Policy LM 9. Policy amended to reflect this guidance. Also see below under S11(II) for revisions made to this Policy based on BDC and BDC Supplementary Housing guidance.
SG&H	S10(XXXI) – See also S11(III)	LM-H12 The policy is not clear and the illustrative calculation is wrong, i.e., 10% of 35 affordable units is 3.5 homes not 10 homes. We also suggest adding the following sentence at the end of the policy: <i>"These restrictions should be delivered through a legal agreement attached to the planning consent."</i>	Now Policy LM 10. See below under S11 for revisions made to this Policy based on BDC and BDC Supplementary Housing guidance.

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
SG&H	S10(XXXII) – See also S11(IV)	LM-H13 This reads as an aspiration and not a policy. Qstn: What is meant by ‘significant proportion’? Would be helpful to give a % similar to other neighbourhood plan policies?	Policy deleted. Unable to support Policy with appropriate evidence.
SG&H	S10(XXXIII)	LM-H14 This reads as a statement not a policy. We suggest the NP avoid phrases such as pastiche.	Policy deleted. Now covered by new Policy LM 8.
SG&H	S10(XXXIV)  See also L4(XIII)	LM-H15 Local Green Space This reads more like a buffer policy to prevent coalescence with Sudbury. It also does not meet the criteria for a Local Green Space as set out in in the NPPF, in particular para 100 c) which refers to extensive tracts of land.  It might be worth exploring the idea further but, perhaps, this issue would be better dealt with by reinforcing the settlement boundaries.  <i>Qstn: Is the reference to ‘all development’, or just ‘residential development’? Also, with reference to the phrase “generally not supported” - surely as green space worthy of protection, it should be protected from all development not required for its long-term protection?</i>	Policy amended. Now Policy LM 14 (Protection of Rural Gap). Separate LGS Policy created (new Policy LM 19) with reference to NPPF para 100 etc.
SG&H	S10(XXXV)	LM-H16 This reads more as a statement than a policy and in any event would not comply with the regulations.	Now Policy LM 15. Guidance accepted and Policy wording amended. Also section added that refers to northwards spread of Sudbury where part of anticipated development will be within LM parish boundary, to seek appropriate compensation via s106 and CIL.
T&P	S10(XXXVI)	Map 5A There appears to be no cross-reference to this map within the supporting text.	This will be amended in the formal Reg 15 submission document. (Para 5.17). XXXX
T&P	S10(XXXVII)	5.3 Suggest delete “which was part of the preparation of the Plan” as this is a given	Paragraph amended. Now para 5.9.

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
T&P	S10(XXXVIII) See also S12(IX)	LM-T1 The policy should be specific on where assessments are required and cannot say where considered to be appropriate by the Parish Council. While addressing the threshold for residential development, no threshold is given for commercial development. You may want to do so, based on floorspace.	Now Policy LM 16. Policy re-worded in line with BDC and SCC guidance.
T&P	S10(XXXIX) See also S12(IX)	LM-T2 (Parking Guidelines) The policy should refer simply to SCC Parking Guidelines as these may be updated in the future. The policy wording stop after the web link. The rest is just detail.  See also SCC guidance on same thing:  Policy LM-T2, Parking Guidelines  Inclusion of SCC Parking Guidance is welcome and supported, however as currently drafted the effect would be limited to residential development. The following amendment is recommended to ensure that SCCs parking guidance applies more widely to different kinds of development.  “Proposals for all new homes to be built in Long Melford must comply with and preferably exceed the SCC Parking Guidance 2015...”	Now Policy LM 17. Policy re-worded in line with BDC and SCC guidance. However additional wording on street widths in new developments and cross reference to LM 16 on Travel Assessments considered as still relevant, so retained.
T&P	S10(XL) - See also S12(IX)	LM-T3 (EV Charge Points) <i>Qstn: Is this an Electric Vehicle Charging Point or the infrastructure to support such that, if required in the future, it could be installed?</i>  We suggest the following alternate wording: <i>“All new residential developments should provide options for EV charging”</i>  SCC guidance below also covers this:  <i>Policy LM-T3, Charging Points in New Developments</i>	Now Policy LM 18. Policy re-worded in line with BDC and SCC guidance.

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		<p><i>This policy is supported however it is recommended reference is made to SCCs Parking Guidance, which also requires that “access to charging points should be made available in every residential dwelling”, however also identifies how this might be achieved. It is also intended that this guidance is updated as technology progresses. A suggested amendment is below.</i></p> <p><i>“Electric vehicle charging points should be made available by developers at every new residential dwelling as set out in SCCs Parking Guidance.”</i></p>	
T&P	S10(XLI)  See also S12(IX)	Comm’ Action LM-TCA1 References here to Cordell Road conflict with the two allocations for housing close to the junction with Bull Lane, and highlights the difficulties of these two allocations.	Community Actions now referred to as Community Objectives. The one referred to here now deleted and a totally new LMCO 1 substituted, to look at improving the village centre from a traffic and parking perspective.
VS&F	S10(XLII)	LM-V1 This is covered by CIL and does not need a policy. If it were to be a policy there should be evidence to support it. Note that you cannot require a contribution to be directed to a specific location.	Policy removed and re-presented as a Community Objective for future consideration by Parish Council. See LMCO 3.
VS&F	S10(XLIII)	Map 6A There appears to be no cross-reference to this map within the supporting text.	Reference added.
VS&F	S10(XLIV)	<p>LM-V2 (Protection of Green Spaces) These Green Spaces are different to the larger "Local Green Space" - which we have commented on under LM-H15. There should also be an explanation as to how the proposed local green spaces meet the criteria set out in para’s 99 &amp; 100 of the NPPF.</p> <p><i>Qstn: Has a Green Space Appraisal been undertaken?</i></p> <p>Note also that any allocated ‘local green space’ must be shown on the Policies Map.</p>	<p>Now see new Policy LM 19 on designation of local green spaces. This is now differentiated from Policy LM 14 on protection of the rural gap between LM and Sudbury. Policy LM 19 set out in conformity with NPPF para.s 99 &amp; 100.</p> <p>Desk top appraisal carried out along with a full consultation exercise involving landowners, other interested parties and the public. All</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
			designated local green spaces marked on Policies Map (Map 6B).
VS&F	S10(XLV)	LM-V3 This reads a statement rather than a planning policy. LM-V4 (Amenities) Suggest this could be linked to the allocation policies. However, developers are unlikely to agree to contribute to off-site provision as this is already part of the CIL payment that they have to pay	Now Policy LM 20. Policy re-worded in line with this guidance.
VS&F	S10(XLVI)	LM-V4 (Amenities) Suggest this could be linked to the allocation policies. However, developers are unlikely to agree to contribute to off-site provision as this is already part of the CIL payment that they have to pay	Now Policy LM 21. Policy retained as stand-alone Policy but re-worded to make clear this is a requirement for development applications exceeding 10 units, unless development is specifically for over 55's. Also Community Objective (LMCO 8) introduced to investigate the adequacy of outdoor play equipment more widely through the village.
VS&F	S10(XLVII)	LM-V5 (Allotments) Should be linked to specific allocations or locations where the principle of residential development is acceptable. The second paragraph is a statement and not policy.	Guidance reflected in site allocation Policy LM 7 where part of allocation is to be reserved for allotments. Stand-alone Policy on allotments provision removed and replaced with a Community Objective to review demand for and supply of land for allotments. (LMCO 9)
B&T	S10(XLVIII)	LM-B1 Avoid referring to plans and policies which may be out of date soon.	Now Policy LM 23. Policy re-worded in line with BDC guidance, to remove reference to 2018 NPPF and 2014 Core Strategy, with reference now to generic 'Development Plan and national planning policies.' Justification modified to reflect NPPF 2019 and emerging JLP.
B&T	S10(XLIX)	LM-B2 (Res to Employ) This could be summarised by stating that where these have minimal impact on existing neighbour amenity they could be	Now Policy LM 24. We wish to support change of use from residential to employment but

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		encouraged, as all considerations stated would already be considered if such an application arose. We suggest you delete the first bullet point as, for example, small home-based businesses may need to employ one or two people from elsewhere. Each application would also need to demonstrate adequate parking in order not to impact on neighbour amenity.	with controls that if anything are more tightly defined than in JLP, with the caveat conferred by the word ‘Generally...’. Policy now accepts some employment of people not resident at location.
B&T	S10(L)	<p>LM-B3 (Employ to Res) This policy contradicts allocations made elsewhere in the Plan (e.g. LM-H3 &amp; LM-H4).</p> <p>It seeks to protect employment and mirrors existing BDC policy EM24 but goes on to offer the opportunity for “counter-vailing benefit”. Once employment opportunities are lost, they rarely return and local employment will be supportive of the wider concerns regarding traffic and transport sustainability that are emphasised throughout the document.</p>	<p>Now Policy LM 25. Guidance considered carefully and Policy wording refined. However whilst NPSG wishes to protect employment land and Policy reflects hurdles that must be accommodated before any change, it reflects that there may be benefits of change which outweigh employment benefits. E.g. with Policies LM 3 and LM 4 (and with more modern and better located commercial facilities envisaged via Policy LM 5).</p> <p>Justification updated to reflect relevant text from NPPF 2019 and JLP.</p>
B&T	S10(LI)	LM-B4 (Nethergate Brewery) This needs to be tightened up. <i>Qstn: What sort of retail is considered appropriate here? Must it be linked to the Brewery?</i>	Policy deleted. Brewery has now expanded site and modified retail offering. No need for allocation now.
B&T	S10(LII)	Comm Action LM-BCA1 We suggest simply as a comment that some of the parking issues are within the PC’s own gift to deliver. The car park is underutilised but much of the street parking is by High Street businesses. Suggest that businesses park and walk to their shop leaving the High Street bays for customers. An alternative would be to introduce time limits for street parking in trading hours.	Community Action/Objective deleted. Now covered within Community Objective LMCO 1 (Ch 5, T&P) where various initiatives to improve village centre parking and to improve resident/visitor experience in the village centre are reviewed. Success with these will benefit village centre businesses.
INP	S10(LIII)	8.4 You could add to the end of the paragraph “... and other decision makers, for example, when planning appeals are considered.”	Paragraph amended. Still 8.4.

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
SG&H	S11(I) –  See also S10(XXV)	<p>Site K should not be allocated as it will not be a rural exception site (RES); also reduce housing to frontage because of planning constraints. Check need for affordable homes and build that many. Consider a community land trust to safeguard the AH provision.</p> <p>If the site was allocated within the NP then it cannot be brought forward as a rural exception site (RES) and could be sold to a developer for a mixed open market development and in this scenario we could only secure 35% affordable housing – unless the terms of the Hamilton Trust prevent this ( is there a covenant on the land?). You have already mentioned that assets have to be used to benefit poor persons or people in reduced circumstances.</p> <p>Avoid the use of words like should and could.</p> <p>If you want to keep this site for 100% affordable housing the recommended course is to bring it forward as a RES or via a Community Land Trust model, which would protect the affordable housing in perpetuity and to meet local need. You would still have the flexibility to cover a number of tenures that meet the NPPF AH definition to have a balance of tenures included in a scheme.</p> <p>In consideration of the existing settlement pattern, it is most likely that the LPA will require a linear development to continue the line of development on the High Street. Is 30 dwellings therefore realistic?</p>	<p>Now Policy LM 6 (for Site K). Policy substantially revised as a result of Reg 14 representations. Site is ‘exceptional’ due to ownership by Hamilton Charity which has its own trust deed, but no longer put forward as a Rural Exception Site. Tenure for affordable housing generally in LMNP will follow JLP: 50-25-25 (see LM 9), which achieves compliance with NPPF, but this site will be exempted from LM 9 due to trust background.</p> <p>Existing trust deed in place which offsets need for Community Land Trust.</p> <p>The NPSG considers the site needs a planning balance to be struck between advantages to village as a site where &gt; 35% affordable housing is acceptable to landowner, but mindful of heritage concerns.</p> <p>Linear pattern not wholly applicable to this site owing to variable curtilages of properties to the south, between entrance to Kentwell and the site.</p>
SG&H	S11(II)	LM-H11. What evidence have the NP group used to come up with a 50:50 split between rented and shared ownership? What did the LHNS results and recommendations say?	Now Policy LM 9. Policy amended to conform with JLP on affordable housing tenure, thus also achieving compliance with NPPF.

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
SG&H	S11(III) – See also S10(XXX)	<p>LM-H12. Housing for Local People, not in conformity with BDC policy; detailed queries about the wording.</p> <p>Why 29% and ... again .. where is the evidence and justification for this figure. Have you just redone the maths for example below?</p> <p>If this was applied to shared ownership dwellings, it is likely that Registered Providers would not bid for shared ownership dwellings with such a restriction on sales. In addition the number of mortgage lenders available where there are restrictions will be reduced. Is your aim to ensure that a proportion of rented dwellings are prioritised for local people?</p> <p>If this site came forward as a rural exception site, 100% of the affordable housing could be available for those households with a qualifying local connection. Housing need arising outside of Babergh would not be considered so the hinterland villages of Foxearth, Borley and Liston should be deleted.</p> <p>As mentioned before this excludes people working fulltime so should be replaced with “people employed in Long Melford or one of the qualifying hinterland villages”. You haven’t commented on the issue raised about households giving or receiving support locally and needing to live in Long Melford.</p>	<p>Now Policy LM 10. Policy amended in response to Reg 14 representations.</p> <p>Calculation amended for better clarity.</p> <p>Focus should primarily be on renters, except there is case for affordable access to ownership. Policy now permits this emphasis.</p> <p>No longer being considered as Rural Exception Site.</p> <p>Qualification as a local person now completely overhauled and includes people ‘..employed in the parish of Long Melford...’</p> <p>For LM 6 the definition of local person will be a function of the Trust deed applicable to that site, unless trust comes to an end. Also this Policy does not apply to LM 5</p>
SG&H	S11(IV) –  See also S10 (XXXII)	<p>LM-H13. Size and Type of Houses, suitably worded, we would be supportive of this policy.</p>	<p>Noted. However Policy deleted. Unable to support with appropriate evidence.</p>

BDC Representations end at this point

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response										
GEN / SG&H	S12(I)	<p data-bbox="501 236 1066 268">SCC has responsibility for matters including:</p> <table data-bbox="501 331 1285 517"> <tr> <td data-bbox="501 331 987 363">Archaeology</td> <td data-bbox="1010 331 1285 363">Libraries</td> </tr> <tr> <td data-bbox="501 368 987 400">Education</td> <td data-bbox="1010 368 1285 400">Minerals and Waste</td> </tr> <tr> <td data-bbox="501 405 987 437">Fire and Rescue</td> <td data-bbox="1010 405 1285 437">Natural Environment</td> </tr> <tr> <td data-bbox="501 442 987 474">Flooding</td> <td data-bbox="1010 442 1285 474">Public Rights of Way</td> </tr> <tr> <td data-bbox="501 478 987 510">Health and Wellbeing</td> <td data-bbox="1010 478 1285 510">Transport</td> </tr> </table> <p data-bbox="501 580 674 612">Archaeology:</p> <p data-bbox="501 660 1491 1002">Use of and reference to the Historic Environment Record in outlining the background of the Village is welcome, as is reference to the richness of archaeological remains in the parish. It would be helpful if this is reiterated in the ‘Key Characteristics, Key Challenges and Vision’ section of the plan (the Historic Character sub-section seems most appropriate). In particular it should be emphasised that there is a high archaeological potential throughout the whole parish. Text should also recommend that applicants should contact the SCC Archaeological Service at the earliest possible time. Below is some suggested text:</p> <p data-bbox="501 1050 1480 1241">“The whole village has a high potential for archaeology due to the density of Roman and Medieval Occupation. Archaeological evaluation should be carried out at the earliest possible time and applicants for planning permission within areas of high archaeological potential should contact the Suffolk County Council Archaeological Service at the earliest possible time.”</p> <p data-bbox="501 1289 1480 1474">A desktop level assessment of sites allocated within the plan has led to the following recommendations to be included within the site policies. For the majority of sites archaeology can be addressed through planning conditions. There are two sites, noted below, where we would recommend additions to the site allocation policies.</p>	Archaeology	Libraries	Education	Minerals and Waste	Fire and Rescue	Natural Environment	Flooding	Public Rights of Way	Health and Wellbeing	Transport	<p data-bbox="1516 236 1615 268">Noted.</p> <p data-bbox="1516 580 2132 772">The NPSG is hesitant about going into detail on Policy nuances within the Characteristics &amp; Vision chapter of the NP (Ch. 3). The village’s rich archaeological heritage is covered in Chapter 2 on The Neighbourhood (para. 2.5).</p> <p data-bbox="1516 1289 2119 1401">However, individual allocation Policies LM-H6 (now LM 6) and LM-H7 (now LM 7) have been updated to reflect this guidance from SCC.</p>
Archaeology	Libraries												
Education	Minerals and Waste												
Fire and Rescue	Natural Environment												
Flooding	Public Rights of Way												
Health and Wellbeing	Transport												

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		<p>Policy LM-H6, Allocation of Sites for Development: K1, Land west of High Street: Due to this site’s size and location on the Medieval town road front it is recommended archaeological evaluation takes place prior to the granting of planning permission. SCC would recommend that this is included in the site allocation policy.</p> <p>Policy LM-H7, Allocation of Sites for Development: F1, Land west of Rodbridge Hill and opposite Ropers Lane: Due to this sites size and location near a Roman Villa and a possible site for burials near the Roman Road it is recommended archaeological evaluation takes place prior to the granting of planning permission. SCC would recommend that this is included in the site allocation policy.</p>	
VS&F	S12(II)	<p>Education:</p> <p>Early Years: Early years provision within Long Melford is on the school site, as mentioned in paragraph 6.9. Early years still requires some consideration by SCC and details will be provided to the parish council as soon as possible.</p> <p>Primary: The catchment Primary is Long Melford Church of England Primary School, and the background information within the plan on the capacity and forecast pupil role in paragraph 6.12 is correct.</p> <p>In isolation the neighbourhood plan growth can be accommodated at the school based on current forecasts. When combined with pending planning decisions (122 dwellings at Stafford Works-15/00565/OUT, and 150 dwellings east of Station Road–DC/18/00606 currently awaiting appeal) the school would be over capacity. There is a potential option to expand the school to 315 places to address additional need. SCC will continue to monitor pupil forecasts and housing development in order address education demands it Long Melford.</p>	<p>Noted. Section on pre-school and capacity updated for Reg 15 submission.</p> <p>Stafford Park application turned down. Para. 6.16 notes that the Station Road permission for 150 houses includes provision for an early years facility on the development site but the school, diocese and Parish Council would prefer this to be located at the school. This is now set out in LMCO 4.</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		<p>Secondary: The catchment secondary school is Ormiston Sudbury Academy. Ormiston Sudbury Academy is experiencing housing growth within the catchment. SCC will consider this growth, including the proposed growth in the neighbourhood plan, in addressing the provision of secondary school places.</p> <p>FOR MORE COMMENT FROM SCC ON EARLY YEARS PROVISION SEE 'SCC Additional Comments' below.</p>	
VS&F	S12(III)	<p>SCC Additional Comments on Early Years Provision.</p> <p>SCC organise early years capacity by district electoral wards. The only early years setting within the ward is at the primary school. There is some ability to provide capacity at this setting however it is expected that this capacity (12 full time equivalent (FTE) places) will be taken up by children arising from the development already permitted or being built within the ward (132 dwellings). The Neighbourhood Plan growth is expected produce need for an additional 7 FTE places, totalling a need for 19 FTE places when combined with development currently in the planning pipeline.</p> <p>The appeal site at east of station road for 150 dwellings would also give rise to an additional early years demand of 13 FTE places if granted permission. Combining the currently permitted growth, the neighbourhood plan growth and the appeal site (if permission is granted) would give a total early years need of 32 FTEs.</p> <p>This gives rise to two possible scenarios.</p> <ol style="list-style-type: none"> <li>1. Current permissions + neighbourhood plan growth = 210 dwellings = 19 FTEs early years demand</li> </ol>	<p>Noted.</p> <p>The appeal in 2019 by Gladman Developments Ltd was successful and planning permission was granted, including a condition on providing SCC with land on the site for an early years facility.</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		<p>2. Current permissions + neighbourhood plan growth + east of station road = 360 dwellings = 32 FTEs early years demand</p>	<p>Outcome 2 now confirmed.</p>
		<p>The second scenario is straightforward to resolve as SCC has requested land on the site east of station road for an early years setting, in the event the land east of station road is granted planning permission.</p>	<p>Noted, but in 2021 SCC has indicated an inclination, at least initially, to retain the land after it is transferred from the developer. The NPSG and Parish Council join the school and the diocese in favouring investment of the funds available from the developer for early years provision, in an expanded facility on the site of the school itself. See LMCO 4.</p>
		<p>The first scenario is more challenging, as 19 FTEs cannot be accommodated at the primary school settings, and 19 FTEs is also not enough demand to enable a new setting to come forward. It is important to note that early years education is provided by the market, meaning there must be sufficient demand to sustain a setting.</p>	
		<p>SCC prefer a plan lead approach to development in order to better enable provision to infrastructure and would like to support the Neighbourhood Plan. As such, the following options are presented that the neighbourhood planning group could consider in order to address this potential infrastructure issue.</p>	
		<p>Specifying a dwelling mix which would create lower demand – certain sizes of dwellings, or dwellings aimed at certain demographics, could lower the overall early years demand. This includes homes for older people (such as sheltered housing, extra care housing, or care homes), or dwellings with one bedroom. It is noted a preference for smaller dwellings and bungalows is stated in policy LM-H13, however it is not sufficiently detailed to specify specific dwelling mixes.</p>	<p>Policies LM 3 and LM 4 allocate sites that are suited to the provision of housing for the older residents. In each case the capacity is to be reserved for occupants over 55 years of age.</p>
		<p>Introducing site phasing into the plan – site phasing would specify when allocated sites can come forward, effectively staggering when demand arises, so that existing early yeas facilities are able to provide for the demand. It should be noted that that during examination of neighbourhood plans</p>	<p>The NPSG does not favour site phasing as a practical consideration and prefers a market based approach.</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		<p>inspectors have not been in favour if this measure, preferring the market to determine when sites should come forward. The Debenham Neighbourhood Plan Submission draft included site phasing, but the inspector recommended removal of this. However it is a possibility if an evidenced case can be made.</p> <p>More site allocations – more allocated housing sites could enable the provision of a new setting, but would also have other impacts such as on the demand for primary school places, and would possibly mean that a repeat of the regulation 14 consultation stage may be necessary. It is also recognised that this option may not be favoured by the community.</p>	<p>There has been a burst of development in LM in recent years and suitable sites for development are very limited, as evidenced in the findings of the NPSG’s call for sites (see Appendix 3). And as noted by SCC there is indeed no appetite for additional development from residents, over and above existing commitments and allocations.</p>
SG&H	S12(IV)	<p>Flooding</p> <p>It would be helpful if the plan could include a description of flood risks within the parish. While paragraph 4.37 indicates that flooding from rivers (fluvial flooding) has been taken into account in the site selection process there is no indication that surface water issues (pluvial flooding) have been considered.</p> <p>It is helpful to highlight flooding as a potential constraint to development. This can then enable development to be directed away from these areas or to justify betterment of surface water conditions from development. There are flooding and drainage issues in Long Melford that the plan positively address through policy.</p> <p>Long Melford is affected by both fluvial (from rivers) and pluvial (surface water) flood risk, which are shown on the maps accompanying this response. The parish centre mainly drains into the River Stour either directly or via ordinary watercourse. There are significant issues with the capacity of the</p>	<p>Noted.</p> <p>The NPSG reviewed this guidance and the NP’s allocated sites, for pluvial flood risk and elected:</p> <ul style="list-style-type: none"> <li>• To indicate against each allocation Policy or Justification, the extent of flood risk and where relevant the need to comply with a new Policy relating to flood risk. See specific Policies/Justifications, including Policy LM-H5 (now LM 5).</li> <li>• To draft a new policy relating to flood risk. See ‘Policy LM 12, Addressing Flood Risk’.</li> </ul>

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Plan Section	ID	Representation	NPSG Response
		<p>Anglian Water sewer system and the private sewers that discharge to the river if additional water is allowed to drain into this uncontrolled.</p> <p>Comment should be sought from Anglian Water as to whether the neighbourhood plan affects these capacity issues. If there is an issue, other forms of drainage, such as infiltration, or retention of water on site would need to be considered. As the Lead Local Flood Authority SCC recommends that the neighbourhood plan strongly encourages drainage through infiltration into the ground or water storage on site.</p> <p>It is noted from the document 'Appendix 3: Call for Sites' that fluvial flood zones were accounted for, but pluvial flood risk was not. In order to help the neighbourhood plan identify flood risks, maps of flood risk and events accompany this response. SCC can offer further advice if this is required.</p> <p>Policy LM-H5: The supporting text should note that there is risk of surface water flooding in the vicinity of this site, however this would not necessarily prevent the site from coming forward.</p>	
SG&H	S12(V)	<p>Health and Wellbeing</p> <p>The plan contains detailed information on the village's demographics and highlights that a significant proportion of the population is over 65. The Suffolk Joint Strategic Needs Assessment (JSNA) Healthy Aging Needs Assessment published in July 2018 highlighted that the proportion of the population over 65 will significantly increase over the next 20 years(1).</p> <p>Housing Types: Due to this there is an increasing need for housing with care across the county. Housing with care is a phrase, in this context, used to discuss a range of housing types for people with a range of with care needs. This ranges from sheltered housing (which has limited care) up to residential</p>	<p>Policies LM-H3 and LM-H4 (now LM 3 and LM 4) include allocations to support additional housing for older people in the village centre. The NPSG concluded that Extra Care Housing would probably require larger developments than proposed in the Plan, to justify the shared facilities commonly provided; An example from HousingCare.org: "In addition to the communal facilities often found in sheltered housing (residents' lounge, guest suite, laundry), Extra Care often includes a restaurant or dining room, health &amp; fitness facilities, hobby rooms and even computer</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
		<p>care or nursing homes (which is care intensive). SCC are keen to promote extra care housing as it can cater to a wide range of care needs.</p> <p>Neighbourhood Plans can positively contribute to addressing the housing and care need of older people by allocating land for housing with care or promoting this type of use through policy. It is recognised that Policy LM-H13 has attempted to promote bungalows for people with impaired mobility. SCC is not able to provide specific information on what numbers of different types of housing with care are required and so would recommend a flexible approach in planning policy. Simply favouring schemes with bungalows does not necessarily address the wide ranges of need that aging people, and other people with care needs, can require.</p> <p>It is recommended that the policy is reworded to be more flexible in providing housing for older people and others with care needs. Suggested wording for the policy amendment is below.</p> <p>“ Proposals for housing with care within category will be supported. In particular Extra Care Housing is encouraged to provide for a wide range of care needs”</p> <p>(Note: Following the review of the NP which resulted from the Regulation 14 consultation, Policy LM-13 was deleted. It was felt that the NPSG was unable to support this Policy with appropriate evidence.)</p>	<p>rooms. Domestic support and personal care are available, usually provided by on-site staff.”</p> <p>It considered that a site could be developed in conjunction with another facility, spreading the costs over a larger estate. An existing example in LM is Steeds Meadow. However it concluded that this might not work with facilities spread between two sites and it would take a large amount of negotiation.</p> <p>The conclusion reached was that the LMNP is not able to provide extra care housing.</p> <p>The NPSG further considered Housing with Support which HousingCare.org describes as:</p> <p>“Housing with support means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors.</p> <p>There are many different types of scheme, both to rent or to buy. They usually contain between 15 and 40 properties, and range in size from studio flats (or 'bedsits') through to 2 and 3 bedroomed.</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

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			<p>Properties in most schemes are designed to make life a little easier for older people - with features like raised electric sockets, lowered worktops, walk-in showers, and so on. Some will usually be designed to accommodate wheelchair users. And they are usually linked to an emergency alarm service (sometimes called 'community alarm service') to call help if needed.</p> <p>Many schemes also have their own 'manager' or 'warden', either living on-site or nearby, whose job is to manage the scheme and help arrange any services residents need. Managed schemes will also usually have some shared or communal facilities such as a lounge for residents to meet, a laundry, a guest flat and a garden.”</p> <p>It concluded that this might be an attractive option for one of the larger sites in the NP, but they have the disadvantage of being more distant from the village centre and thus less suited to older people.</p> <p>Given that two small sites (L1 and A1) have been allocated for people over the age of 55 and noting the difficulty of identifying suitable sites for either Extra Care Housing or Housing with Support, it was decided that no further provision for older people would be made in the Plan.</p>

Table 2: Representations made to Regulation 14 Consultation, with NPSG responses

Plan Section	ID	Representation	NPSG Response
GEN	S12(VI)	<p data-bbox="499 564 763 600">Minerals and Waste</p> <p data-bbox="499 644 1496 954">SCC is the mineral and waste planning authority for Suffolk. This means the county makes planning policy for minerals and waste and determines planning applications for sites with these activities. The current relevant policy documents are the Core Strategy for Minerals and the Core Strategy for Waste. There is also an emerging document which will replace both of these documents, the Suffolk Minerals and Waste Local Plan (SMWLP). This plan is currently awaiting examination in public, however it is expected that it will be adopted later this year.</p> <p data-bbox="499 999 1467 1072">It is recommended that these documents are also mentioned as part of the local development plan in paragraph 1.6.</p> <p data-bbox="499 1117 1487 1305">Minerals: The Minerals Core Strategy and the SMWLP contain policies that safeguard minerals resources across the county. In Suffolk this is mainly sand and gravel, which is used as aggregate. Areas of potential mineral resource are identified in the plans within a Minerals Consultation Areas (MCA). The MCAs in the Minerals Core Strategy and the SMWLP differ.</p> <p data-bbox="499 1350 1397 1423">Following review of the plan it has been determined that there are no minerals safeguarding issues.</p>	<p data-bbox="1518 274 2101 539">There is noteworthy existing provision for older people in the village: Steeds Meadow, Melford Court, Holy Trinity Hospital (not limited to older people but tends to be)and Orchard Brook (a recent addition). Chapter 2 has been updated to mention this, in para. 2.14.</p> <p data-bbox="1518 564 2056 679">Noted. Para. 1.6 updated for the Suffolk Minerals and Waste Local Plan which was adopted in July 2020.</p>

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Plan Section	ID	Representation	NPSG Response
		<p>Waste: The Waste Core Strategy and the SMWLP contain policies to prevent waste facilities being prejudiced by new development. There is one waste site within Long Melford which is the Anglian Water waste water treatment plant to the west of the parish. No development is proposed near this facility so there are no safeguarding issues to raise.</p>	
<p>GEN/ SG&amp;H/ VS&amp;F</p>	<p>S12(VII)</p>	<p>Natural Environment</p> <p>Ecology: As part of its aspiration to be the greenest county SCC would encourage inclusion of a policy which can enable gains for biodiversity where possible. Paragraph 174 of the NPPF states that plans should “identify and pursue opportunities for securing measurable net gains for Biodiversity”</p> <p>The following is suggested wording which could be used as a policy in the plan to provide benefit for wildlife through development.</p> <p>“Development proposals that incorporate into their design features which provide gains to biodiversity will be supported. Landscaping and planting should encourage wildlife, connect to and enhance wider ecological networks, and include nectar rich planting for a variety of pollinating insects. Divisions between gardens, such as walls and fences, should still enable movement of species, such as hedgehogs, between gardens and green spaces. Existing ecological networks should be retained”</p> <p>Area of Outstanding Natural Beauty (AONB): It is appropriate that the plan notes Long Melford is in the project area for the Dedham Vale and Stour Valley AONB, however for clarity it should be noted that it isn’t the whole of this project area that is considered for the extension of the AONB. The extension area would extend the AONB up the Stour Valley and stop just to the south of Sudbury</p>	<p>The NPSG created a new Policy as a result of this guidance, ‘Policy LM 13, Encouraging Biodiversity.’</p> <p>Para. 2.3 and Map 2B, within Ch 2, updated to reflect this guidance.</p>

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Plan Section	ID	Representation	NPSG Response
		<p>Local Green Space: The principle of maintaining a green gap is understood, however use of the of Local Green Space designation to achieve this in policy LM-H15 is inappropriate as it is contrary to national policy. Paragraph 100 states Local Green Spaces should not be “an extensive tract of land”. The area in total measures approximately 90 hectares, which could be argued is extensive. An example of Local Green Spaces being found to be extensive is in the examiner’s report of the Backwell Neighbourhood Plan, where the examiner recommended modification to remove Local Green Spaces designations of 19 hectares and 32 hectares(2) from the plan.</p> <p>This is not to say that the plan cannot include a policy to maintain a gap of open countryside between Long Melford and Sudbury. For example, the Stowupland Neighbourhood Plan(3) (which was recently examined and approved to go forward to referendum) contains a “Green Gap” policy to prevent coalescence with Stowmarket. An equivalent policy could be applied to the long Melford Neighbourhood Plan. To give examples of an appropriate use of the Local Green Space designation there are areas within the plan which could meet the requirements and have been identified on Map 6A- Village Services and Facilities. The Green, Little Green, Allotments, Football and Cricket Grounds and Country Park, could meet the criteria of being demonstrably special to the local community, if the parish council provides justification, and they are not extensive tracts of land.</p>	<p>Policy LM-H15 (now LM 14) revised as a result of SCC’s guidance on Local Green Space/”Green Gap” and the NPSG’s desire to avoid coalescence between Sudbury and LM. This revision also took into account representations on this subject by BDC and Gladman Developments Ltd.</p> <p>The related guidance on appropriate local green space designations within the village was a main contributory factor to the creation of a new Policy, ‘LM 19, Designation of Local Green Spaces’. Justification for this Policy has drawn from the relevant criteria within NPPF 2019.</p>
GEN / VS&F	S12(VIII)	<p>Public Rights of Way (ProW)</p> <p>Long Melford benefits from a reasonable local PRoW network. This network can provide a wide range of benefits including: physical and mental health benefits through access to the countryside; providing wildlife corridors; and in some circumstances providing sustainable transport options. The NPPF paragraph 98 states that planning policy should protect and enhance the PRoW network and it is encouraged that Long Melford Parish Council do this</p>	

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		<p>through the plan. This could be achieved through amendments to the supporting text and the inclusion of a policy.</p> <p>To recognise the benefits of PRoW in the plan an amendment is suggested for inclusion in paragraph 3.5.</p> <p><i>“Long Melford is surrounded by farmland, which gives it a wonderful rural setting and a number of outstanding views. It also benefits from a public rights of way network facilitating access to the countryside”</i></p> <p>An amendment is suggested for paragraph 3.27 to bring the intention of national policy into the plan.</p> <p><i>“To protect and enhance the green spaces in, and the landscapes around, the parish and to facilitate more people having the opportunity to enjoy those spaces, and to secure the valuable natural environment, and protect and enhance public rights of way which provide access to the countryside.”</i></p> <p>The following is recommended policy wording to include within the plan, either as part of another policy or as its own policy.</p> <p><i>“The Public Rights of Way network will be protected and enhanced. Where possible development should take opportunities to expand and improve links with the wider network, and improve the wider network.”</i></p>	<p>The text in Ch 3 (Characteristics and Vision) has been adapted along the lines suggested. (Para.s 3.5 and 3.27).</p> <p>A new Policy has been drawn up (LM 22, Protection and Enhancement of Public Rights of Way), drawing from SCC’s suggested Policy wording. In addition, a Community Objective has been added, LMCO 10 to encourage the “Promotion of Public Rights of Way”, with an aim of the Parish Council being for the village to attain ‘Walkers are Welcome’ status. Five new circular walks have been drawn up, with leaflets available at village locations and download codes, utilising sponsorship from local businesses. (See para. 6.45).</p>
T&P / VS&F	S12(IX) –  See also S10(XXXVIII) To S10(XLI)	<p>Transport</p> <p>The emphasis placed on walking and cycling in the plan is welcome. SCC support the principle of increasing the ability of people to walk and cycle or use other modes of sustainable transport.</p> <p>Policy LM-T1, Sustainable Travel</p>	<p>All noted and guidance utilised.</p> <p>Policy LM-T1, now Policy LM 16, has been updated to reflect this guidance and the suggested Policy wording.</p>

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		<p>The intent of this policy is supported however amendments are recommended so that the policy aligns with national policy (allowing the plan to meet the Basic Conditions), aligns with local guidance, and to make the policy more effective.</p>	
		<p>NPPF paragraph 104 states that “planning policies should minimise the number and distance of journeys needed for employment, shopping, leisure, education and other activities...” As drafted the policy only applies to commercial and residential development. Other types of development, such as leisure and community uses (health facilities, schools, etc...), should also be located and developed in a way that reduces reliance on the car, but the policy as currently worded could restrict where these benefits are applied.</p>	
		<p>Changes to the second paragraph are recommended, as SCC has released new Travel Plan Guidance in January 2019(4), which applies to broader range of development and contains more specific information than is included in the policy. In general the policy should refer to county Travel Plan Guidance. Below is a redrafted version of the policy including recommended changes.</p>	
		<p><i>“ Where relevant development should encourage sustainable travel, reduce reliance on car use and, where possible, improve accessibility to public transport. Developers must ensure that their site is linked to village facilities (as a minimum including but not limited to, one of the village convenience stores, the GP practice and the primary school) by safe, and adequately lit footways and cycleways which connect with existing footways and cycleways.</i></p>	
		<p><i>Planning applications for developments that will generate significant amounts of traffic movement must be accompanied by a Transport Assessment or Transport Statement. Travel Plans or Travel Plan measures will be required as set in the Suffolk County Council Travel Plan Guidance.</i></p>	

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Plan Section	ID	Representation	NPSG Response
		<p><i>Guidance on Transport Assessments, Transport Statements and Travel Plans should be sought from SCC.”</i></p>	
		<p>Policy LM-T2, Parking Guidelines</p> <p>Inclusion of SCC Parking Guidance is welcome and supported, however as currently drafted the effect would be limited to residential development. The following amendment is recommended to ensure that SCCs parking guidance applies more widely to different kinds of development.</p> <p>“Proposals for all new homes to be built in Long Melford must comply with and preferably exceed the SCC Parking Guidance 2015...”</p>	<p>Now Policy LM 17. Policy wording updated to reflect this guidance, with slight adaption to strengthen the impact of this Policy on wider forms of development. Wording also ‘future proofed’ so that future SCC parking guidance is applicable.</p>
		<p>Policy LM-T3, Charging Points in New Developments</p> <p>This policy is supported however it is recommended reference is made to SCCs Parking Guidance, which also requires that “access to charging points should be made available in every residential dwelling”, however also identifies how this might be achieved. It is also intended that this guidance is updated as technology progresses. A suggested amendment is below.</p> <p><i>“Electric vehicle charging points should be made available by developers at every new residential dwelling as set out in SCCs Parking Guidance.”</i></p>	<p>Now Policy LM 18. Policy wording changed to the wording suggested by SCC.</p>
		<p>Community Action LM-TCA1, Improve the Village Centre</p> <p>SCC would welcome consultation on the public area study, and as highway authority consider the results and any recommendations made. Please note that SCC does not have available funding for public realm interventions in Long Melford therefore it would be sensible for the study to include consideration of funding and delivery mechanisms. These could include</p>	<p>Community Actions now referred to as Community Objectives. The one referred to here now deleted and a totally new LMCO 1 substituted, to look at improving the village centre from a traffic and parking perspective. SCC Highways have been consulted by the NPSG’s Traffic &amp; Parking working group which</p>

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		<p>funding by developers as mitigation for schemes in Long Melford or use of the Parish Council’s Community Infrastructure Levey funding.</p> <p>The study could also relate to the demographics of Long Melford as identified in the plan. It is recommended that the study considers how the public realm caters to the needs of older people and the needs of people with cognitive issues, such as dementia, which can impair an individual’s ability to navigate space. The Royal Town Planning Institute has produced advice on how planning can create better environments for people with dementia(5).</p> <p>Community Action LM-VCA2</p> <p>The review of links between green spaces could include cycle links as well as pedestrian links. There may also be scope elsewhere in the plan to look into potentially good locations for cycle parking within the town.</p>	<p>has formulated the recommendations within this Community Objective.</p> <p>New Policy ‘LM 22, Protection and Enhancement of Public Rights of Way’ and new Community Objective ‘LMCO 10, Promotion of Public Rights of Way’ are aimed at both footpaths and cycle links. The village has a number of frames for cycle parking already in place and these will be kept under review.</p>
SG&H	S12(X)	<p>Site G1,Spicers Lane</p> <p>Spicers Lane is a narrow single track access with no separate footway that serves approximately 10 dwellings, there is access to the footway network and public transport links on the high street and it is considered this will be acceptable for another single dwelling. There is poor visibility for Spicers Lane onto Hall Street due to parked cars and street furniture in the layby, however speeds in this area are generally low. The proposal is within a parking area; If this provision is for existing dwellings or business, then they would need to be accommodated elsewhere.</p>	<p>Policy LM 2 wording adapted to require ‘Satisfactory access and full and satisfactory parking provision within the site according to SCC guidance.’</p>
SG&H	S12(XI)	<p>Sites L1 and A1, Cordell Road</p>	<p>Policies LM 3 and LM 4 wording adapted for suggested visibility splays (unless this would</p>

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		There are existing accesses off Cordell Road. These sites will be suitable the small number of dwellings proposed. Visibility will need to be 2.4m x 43m for the vehicle access on both locations.	compromise the character and quality of the Conservation Area whereupon a lesser requirement may be acceptable).
SG&H	S12(XII)	<p>Site B1 Borley Road</p> <p>Borley Road does not have a footway linking the site to the existing footway network and there is very little highway verge to provide a footway. For 18 dwellings, this would not be acceptable in sustainable access terms. In the past 5 years there have been 7 injury accidents on the B1064/Borley Road junction. This junction will need to be investigated and major mitigation provided. It is recommended that the policy requires any planning application address the pedestrian access issue and the potential impacts on the junction.</p>	Policy LM 5 revised in the light of this guidance. The site is now enlarged, enabling pedestrian access to be provided to Roper's Lane. The proposed scheme is now mixed use: 300 sq.m. of employment space and 10 residential units.
SG&H	S12(XIII)	<p>Site K1, High Street</p> <p>The site has access to the footway network on high street and has bus stops within walking distance, making this site acceptable from a sustainable transport perspective.</p>	Noted.
SG&H	S12(XIV)	<p>Site F1 Rodbridge Hill</p> <p>Rodbridge Hill has a footway network on the opposite side of the road to the site, so a crossing point and bus stops will be required along the frontage of this site.</p>	Policy LM 7 wording amended to reflect this guidance.
SG&H	L1	<p>Support for allocation of site A1 in Cordell Road: small development in accessible location; care needed re neighbouring properties and Cons Area.</p> <p>Similar support for allocation of site L1, Cordell Road.</p> <p>Also support for allocation of site F1, east of Rodbridge Hill. Few constraints and possible to retain hedge along frontage except where access needed.</p>	No action needed. Rose Builders visited these sites and met the landowners. They believe all are deliverable. This is useful evidence to support allocations. <span style="color: red;">XXXX</span>

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SG&H	L2	Good plan, but Policy LM-H11 weak; site K1 may provide 100% affordable housing (AH), other smaller sites will not deliver AH; and K1 will not be tenure blind (all social housing concentrated in one place).	Two further allocated sites, F1 and D1, will provide affordable housing. The latter also tabled to provide less expensive market housing (new Policy LM 11). K1 is not a large site but it is an unusual opportunity to provide social housing. The notion of single tenure (AH) sites is accepted in NPPF e.g. paras 71 and 77, especially in rural areas. Mixed tenure would be valuable but that has to be balanced against an unusual opportunity in LM to provide affordable housing. The NPSG has since met with the landowner and Policy LM 6 has since been revised to include c33% market housing and minimum 66% affordable housing.
SG&H	L3(I)	In assessing housing need NP has simply taken population % share, with no account of Core Village status/development share. No objective assessment of need. AH need opaque. CAS quoted but not provided in evidence: 195 'need' is unclear: what period, what type of housing?	Housing need and supply assessment has been updated and agreed by BDC.  CAS Housing Need Survey (for Hamilton Trust) not to be used as evidence.  Selected amendments to be made to paragraphs 4.12 to 4.33 on Housing Need to reflect the response to this comment.
SG&H	L3(II) –  See also S10(XXII – XXIV) and S12(XI and XII).	AH need opaque. If employment land cases failed, housing capacity is reduced to 61 dwellings of which 41 AH.	Options for employment land change have been explored: <ul style="list-style-type: none"> <li>• drop the allocations;</li> <li>• include some employment in the development;</li> </ul>

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			<ul style="list-style-type: none"> <li>make the case based on full residential use and win or lose the case in later stages of the consultation and examination process.</li> </ul> <p>Outcome: the case for change of use of the employment sites has been strengthened and will be clearly made. Provision has been made for modern employment units on Site D1.</p> <p>Text in Policies LM 3, LM 4 and LM 5 (and their Justification para.s) all changed in response to this representation and in response to guidance from BDC (S10 XXII – XXIV).</p>
SG&H	L3(III)	Evidence has not informed the NP strategy e.g. in relation to aging pop not reflected in housing strategy.	Two sites now allocated for older people (L1 and A1); both policies amended to reflect this change (LM 3 and LM 4).
SG&H	L3(IV)	Site assessment fails to take account of LM-specific characteristics; too much dependent on Heritage/Sensitivity Study which considers nothing N of Melford Hall.	Sites assessed against 26 local criteria. Heritage/Sensitivity Study is itself very sensitive to LM character. In spite of constraints a significant site (K1) has been allocated for residential development north of Melford Hall.
SG&H	L3(V)	NP does not address need for commercial space.	Point accepted; no suitable additional sites are available, so NP now includes provision for employment in Site D1 (Policy LM 5) alongside an allocation for housing.
VS&F / B&T	L3(VI)	Tourism addressed in dismissive manner; no account of needs of industry workers.	As well as the appeal of LM’s Grade 1 listed properties, tourists are encouraged to visit by the attractive village centre and the balance in

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			<p>favour of independent shops, tearooms etc. The plan promotes a better village centre experience (LMCO 1). The NP also seeks to protect and enhance its local green spaces and to protect/promote public rights of way, the latter with the aim of becoming a ‘Walkers are Welcome’ village. The Plan has also supported a much improved central car park, opposite Melford Hall (LMCO 5). This should also help the village to attract visitors and tourists.</p> <p>Policy ‘LM 10, Housing Reserved for Local People’ includes the provision of affordable housing to people employed locally, thus providing for local workers.</p> <p>Policy LM 23 reworded in the light of this representation. It seeks to support ‘local businesses, local tourist facilities and the local economy...’, with ‘Applications for new...tourism and leisure facilities(or expansion to existing...facilities)...welcome...’</p>
GEN	L3(VII)	<p>NP unambitious, failing to address needs; negative approach (quote). Assumption that development is negative; NP should have addressed need across all sectors and sought to meet it.</p>	<p>The NPSG does not accept this comment. It has supported development in the village and various Community Objectives are very positive and are already being acted on by PC:</p> <ul style="list-style-type: none"> <li>• Parking</li> <li>• Village halls</li> </ul>

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Plan Section	ID	Representation	NPSG Response
			<ul style="list-style-type: none"> <li>• Paths and cycleways</li> <li>• Village centre initiative</li> </ul> <p>Plan has allocated land for development on a scale that has been approved by BDC.</p>
GEN	L4(I)	<p>Plan tested against Basic Conditions. Framework is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent sustainable development opportunities from going ahead. Policies that are not clearly worded or intended to place an unjustified constraint on further sustainable development from taking place are not consistent with the requirements of the Framework or the Neighbourhood Plan Basic Conditions. Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions....</p> <p>Extensive quotes from NPPF, PPG</p>	<p>NPSG notes but does not accept this representation. LMNP has been compiled to conform with NPPF and the emerging JLP, in a fashion that supports sustainable development, with deliverable site allocations.</p>
GEN	L4(II)	<p>The SEA is a systematic process that should be undertaken at each stage of a Plan’s preparation. Too often SEA flags up the negative aspects of development whilst not fully considering the positive aspects No indication whether NP screened or if SEA required.</p>	<p>LMNP screened as requiring a Strategic Environmental Assessment (SEA). SEA completed April 2021 and amongst its conclusions:</p> <p><i>‘The assessment of the latest version of the Neighbourhood Plan has concluded that the plan as a whole is likely to lead to significant positive effects in relation to the population and communities SEA theme, whilst minor positive effects are anticipated in relation to the biodiversity, climate change and historic environment themes. Neutral effects are anticipated in relation to the transport theme, whilst minor negative effects are anticipated in</i></p>

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Plan Section	ID	Representation	NPSG Response
			<p><i>relation to the land, soil and water resources theme. Uncertain effects are anticipated in relation to the landscape themes.</i></p> <p><i>When read as a whole, the Neighbourhood Plan is anticipated to result in broadly positive effects in relation to the SEA framework’.</i></p>
SG&H	L4(III)	<p>Then set out provisions of adopted DP. And emerging JLP. LMNP will have to be very flexible in order to accommodate the new Plan and projections of housing need. No indication yet of share of growth of Core Village/LM.</p> <p>Too little development proposed; no robust assessment of housing/development need. Hence too little land allocated. Policy CS11 of the adopted Core Strategy requires housing need to be based upon a locally identified housing need however the Core Strategy is now over 5 years old and policies will need to be reviewed to see whether they will need updating, in line with Paragraph 33 of the revised Framework. Revised Framework now requires strategic-policy making authorities to provide designated neighbourhood areas a housing requirement and where this is not possible, to provide an indicative figure where requested. The Steering Group would be better placed requesting an indicative figure from the Council. It is highly likely that the housing requirement will be higher than the level currently proposed within the LMNP and further housing allocations will be required.</p>	<p>LMNP has been significantly revised to conform with emerging JLP which has also clarified the housing need requirement for LM.</p> <p>Proposed development exceeds this requirement (which is viewed as a minimum requirement). Thus land allocation is deemed more than adequate and ongoing dialogue with allocation landowners supports optimism with regard to deliverability.</p>
SG&H	L4(IV)	<p>Several of the site allocations are either within the Conservation Area or are currently in employment use.</p>	<p>Development is not forbidden in either of these designations. A case has to be made and appropriate protection provided.</p> <p>The need to address employment land is accepted and is being addressed via Business &amp; Tourism section of NP and via Policies LM – H3, H4 and H5 (now LM 3, LM 4 and LM 5),</p>

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Plan Section	ID	Representation	NPSG Response
SG&H	L4(V)	Allocate Station Rd site; The principle of development in this location is accepted by the Steering Group through Policy LM-H9. Station Rd delivers more AH than K1 and is more accessible. Benefits of delivering development on this scale as an alternative should be explored through SEA.	<p>which have been amended to take account of employment land issues.</p> <p>It was not a matter of principle, but rather of scale and location. Policy LM-H9 now deleted from NP due to unwillingness of owner to agree to appropriate development. SEA has assessed LMNP against reasonable alternatives (including the Station Road proposal) and has concluded, in assessing the plan in relation to these alternatives:</p> <p><i>“The sites proposed for allocation in the Neighbourhood Plan are listed below:</i></p> <ul style="list-style-type: none"> <li>• <i>Site A1 (Cordell Road, adjacent to rear of Bull Hotel)</i></li> <li>• <i>Site D1 (Land in Borley Road)</i></li> <li>• <i>Site F1 (Land east of Rodbridge Hill and opposite Ropers Lane)</i></li> <li>• <i>Site G1 (Spicers Lane)</i></li> <li>• <i>Site K1 (Land west of High Street)</i></li> <li>• <i>Site L1 (Cordell Road)</i></li> </ul> <p><i>(Collectively, <b>Option 2</b> : Sites A1, G1 and L1 plus sites D1, F1 and K1. 77 dwellings. Preferred option).</i></p> <p><i>These six sites were identified from the pool of sites options that the Parish Council’s site assessment exercise found to be potentially suitable for development. Individually, the</i></p>

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			<p><i>preferred sites are considered to align best with the Plan’s objectives and the combination of these six sites performs most strongly when tested against the reasonable alternatives.</i></p> <p><i>In this context the assessment finds that <b>Option 2</b> stands out as the strongest performing option. It meets and exceeds housing need, distributes growth throughout the village to sites in the north, south and centre of the settlement and is likely to ensure a significant delivery of affordable housing.’</i></p>
SG&H / B&T	L4(VI)	Employment land: risk of undermining strategic policies to support job growth.	Plan amended to provide employment space on site D1 (Policy LM 5). See also change of use Policy (employment to residential), LM 25. Policies LM 3 and LM 4 (both employment land) are viewed as consistent with Policy LM 25, as they are considered likely to lead to a net benefit to the village.
SG&H	L4(VII)	H8 Chilton growth area sites: make it background text to Housing rather than policy.	Policy now removed and partially incorporated within new Policy ‘LM 15, Mitigating Development Impact’.
SG&H / VS&F	L4(VIII)	Development could bring community facilities (which will not be possible on other allocated sites). G proposal needs to be tested through SEA (alternatives); site tested in NP is larger than proposal	LMPC has an investment strategy via Parish Infrastructure Investment Plan for infrastructure in the village, the funding for which is based on current known development proposals.

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SG&H	L4(IX)	H10, Size and Character of Developments, preference for smaller developments needs to be tested for sustainability through SEA.	<p data-bbox="1503 236 2132 347">Gladman proposal for Station Rd development has been tested against LMNP within SEA. See L4(V) above.</p> <p data-bbox="1503 371 2132 523">SEA has tested the policies of the LMNP. Policy LM-H10 (now Policy LM 8) was assessed firstly as follows, in relation to ‘Historic Environment’:</p> <p data-bbox="1503 563 2132 1034"><i>‘Policy LM 8 (Impact and Character of Developments) has a broader focus, setting a requirement that all developments greater than 10 units are responsive to the potential heritage sensitivities of their immediate and wider setting. The policy requires proposals to demonstrate that they respect Long Melford’s “streetscape/townscape, heritage assets, important spaces, entry points to the village and historic views into and out of the village”. The policy could directly result in positive effects in relation to heritage’.</i></p> <p data-bbox="1503 1074 2132 1145">Then it was assessed in relation to ‘Landscape,’ as follows:</p> <p data-bbox="1503 1185 2132 1458"><i>‘Policy LM 8 (Impact and Character of Developments) is multi-stranded and is not exclusively landscape focussed, though consideration of landscape effects is a key element. The policy says that development proposals must demonstrate that “the scale and character of the proposal respects the</i></p>

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			<p><i>landscape [and] landscape features". The policy also includes a broader requirement for development to "make a positive contribution to the local character, shape and scale of the area". The intent is to limit schemes which, by virtue of scale and location, could have potential to erode or change the perception of the village within the landscape or harm its landscape setting. When the proposed allocation of Site F1 is seen in the context of the requirements of Policy LM 8 it is considered that potential landscape harm arising from the site's sensitive location could potentially be mitigated by development which is consistent with LM 8. However, the precise nature of effects will be determined by detailed matters of design and layout and are therefore uncertain at this stage.'</i></p> <p>Also the Residents Survey, completed by 1,995 residents, endorsed smaller developments (below 20 and 40 dwellings) strongly.</p>
SG&H / B&T	L4(X)	Delete ref to CS11 and SPD which will need review; NP will then be more long-lasting.	These references have been removed following this representation and upon advice from BDC.
SG&H	L4(XI) –  See also S10(XXX) And S11(II)	H11 AH, repeats much of CS19; delete. Proposed tenure split not founded in evidence; discuss with BDC housing officers to achieve compliance.	Now Policy LM 9. Policy amended to reflect BDC and BDC Strategic Housing guidance.

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SG&H	L4(XII) –  See also S11(III) And S10(XXX)	H12, housing for local people, not a land use policy; make it a community action.	Now Policy LM 10. Policy substantially amended after advice from BDC Strategic Housing.
SG&H	L4(XIII)	H15, Local Green Space, conflicts with NPPF in scale and purpose; delete policy.	<p>Accepted that LM-H15 does not comply with NPPF para 99 – (See new Policy LM 19). The PC’s aim of protecting the character of LM, including approaches to it and views of it (policy amended to protect the Rural Gap – Policy LM 14), is supported by other policies in NPPF, including para 15 on plan-making: “Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.” And para 28 which sets out the role of non-strategic policies (in NP’s) in “conserving and enhancing the natural and historic environment” And para 127: Planning policies and decisions should ensure that developments:</p> <p>.....</p> <p>c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); Finally para 135 on the</p>

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		<p>Comment related to this representation from P Bryant (BDC):</p>	<p>(non)establishment of new Green Belts is helpful: “New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should: a) demonstrate why normal planning and development management policies would not be adequate;” This recognises that similar protection to that offered by Green Belts will be appropriate in other circumstances than those quoted and that normal and planning and development management policies will be employed.</p>
		<ol style="list-style-type: none"> <li>1. The approach is unnecessarily convoluted and not robust. The most effective way to achieve what we understand the desired outcome to be (avoiding coalescence) is by designating the built-up area and the countryside as per the JLP approach.</li> <li>2. The countryside part would therefore be considered in the context of NPPF paras 170b and 77-79, along with other relevant policy consideration.</li> </ol>	<p>Gap policies have been included in other LPAs’ development plans e.g. Hart DC and Stowupland NP.</p> <p>NPSG response to PB comment:</p> <ol style="list-style-type: none"> <li>1. Relies on BUAB which is significant problem for LMNP</li> <li>2. NPPF 170b has a strong and inappropriate (for LMNP’s purpose) reliance on the agricultural and ecological qualities of the land, on which we have no evidence.</li> </ol>

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		<p>The area is not deemed Green Belt as per NPPF 135 as the tests of exceptionality does not apply to LM.</p>	<p>NPPF 77 – 79 relates exclusively to rural housing, whereas we want to restrict all development.</p> <p>Approach makes all land beyond BUAB countryside in which development will be restricted unless exceptional circumstances exist. NPPF favours a positive approach to development (11a).</p> <p>NPSG is not claiming Green Belt status.</p>
SG&H	<p>L5 –</p> <p>See also S10(XXV) and S11(I) and S12(XIII)</p>	<p>The (Hamilton) Charity is keen to develop some affordable housing in the village for local people. We support the suggested allocation of thirty properties on the Old Allotments site at High Street. We are in touch with Babergh Planning and Housing personnel and also in touch with housing providers to try and move this scheme forward. Colleagues on the Neighbourhood Planning Team may be aware of the strong representations by Historic England and the constraints that this could place on the site. Our view is that we would want to maximise use of the site to meet local housing need.</p>	<p>NPSG has developed Policy LM-H6, now Policy LM 6, in consultation with Hamilton trustees.</p>