

Lavenham Neighbourhood Plan 2 (2023 – 2037)

Reg 16 Submission consultation responses

In April 2022, Lavenham Parish Council (the 'qualifying body') submitted a modification draft of their Neighbourhood Development Plan (LNP2) to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 3 July to Friday 18 August 2023.

Twenty-two representations were received. These are listed below and copies are attached.

A late representation was received from Historic England. A copy is included for information only.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Natural England
(4)	Suffolk Wildlife Trust
(5)	National Highways
(6)	Anglian Water
(7)	Water Management Alliance
(8)	Avison Young (obo National Grid)
(9)	Defence Infrastructure Organisation (obo the Ministry of Defence)
(10)	The Lavenham Press Ltd
(11)	Lavenham Community Land Trust
(12)	Brooks Leney (obo Ms Green)
(13)	Resident - Aspa
(14)	Resident - Baker & Stefanska
(15)	Resident - Burton
(16)	Resident - Churchyard
(17)	Resident - Farmer
(18)	Resident - Heeks
(19)	Resident - Posner
(20)	Resident - Mrs Reeve
(21)	Resident - Mr Reeve
(22)	Resident - Twitchett
(23)	Late representation - Historic England

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(1) SUFFOLK COUNTY COUNCIL

Date: 18 August 2023
Enquiries to: Georgia Teague
Tel: 01473 265054
Email: georgia.teague@suffolk.gov.uk
neighbourhoodplanning@suffolk.gov.uk



Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Dear Mr Bryant,

Submission Consultation version of the Lavenham Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Lavenham Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Policies Map

SCC reiterates that they would like to see a Policies Map, it is noted that this is not available at the submission stage. It would have been preferable to have sight of this prior to examination, however, the Council understands that the LNP2 Review Group is working towards this aim with the District Council.

Public Rights of Way

SCC recognises that the consultation statement dismisses caution regarding designating a public right of way as a Local Green Space (LGS 19, Lavenham Railway Walk) in Policy LAV19.

The NPPF 2021 paragraph 100 states that “planning policies and decisions should protect public rights of way access”, however, SCC believes that Local Green Spaces are not the most appropriate method to achieve this.

Public Rights of Way already have their own protections in policy; thus, this designation is unnecessary.

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague
Planning Officer
Growth, Highways, and Infrastructure

(2) BABERGH DISTRICT COUNCIL

Our ref: LNP2 R16 Response

Dated: 18 August 2023

From: Planning Policy Team, B&MSDC

To: Janet Cheesley (Independent Examiner)

cc: Lavenham Parish Council

Dear Janet,

Reg 16 Submission draft Lavenham Neighbourhood Plan 2

Representation from Babergh District Council

This response is made for and on behalf of Robert Hobbs, Corporate Manager for Strategic Planning.

Babergh District Council welcomes the changes that have been made to the submission draft Lavenham Neighbourhood Plan 2 (LNP2) in response to our previous comments. Simple measures, such as placing the plan policies against a blue background help make the plan more readable.

We have found it necessary to revisit some of our previous comments in light of the Parish Council's responses to these (set out in the Consultation Statement) and set these out below as succinctly as possible. Where appropriate, we include some specific questions directed to the Parish Council.

LAV 13: A spatial strategy for Lavenham

Criterion 2.a. remains unchanged from the R14 document. We had asked that this be amended to allow more flexibility for rural exception sites to come forward and suggested [now with a final amendment] the following wording:

- a. Rural exception sites ~~on the edge of the settlement boundary~~ that are well-connected to the settlement and key services and accord with Policy LAV17 of this Plan.

The Consultation Statement (Appendix 7, PDF page 158) records that: 'Further to discussion agree NOT to make this change.'

The response is a little disappointing and so we repeat our request, noting that:

- it would increase the effectiveness of the LAV13(2.a.) by allowing for rural exception sites which are outside but otherwise well-connected to the settlement boundary and key services. Without this change, the policy implies that such proposals can only be immediately adjacent to the settlement boundary when there may be a suitable site a short distance away.
- that this amendment would improve the ability of the LNP2 to contribute to the achievement of sustainable development and ensure consistency between this Plan and the emerging Joint Local Plan.

Cont./



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Telephone: (0300) 1234 000
www.babergh.gov.uk / www.midsuffolk.gov.uk

Criterion 4 also remains unchanged from the R14 document. At the time, we had strong reservations about what felt like an artificial ‘cap’ placed on the maximum size of new housing development proposals. The responses set out in the Consultation Statement have directed us to LNP2 paragraphs 7.1.2 and 7.1.3 and to the ‘Maximum Size of Residential Schemes’¹ evidence document that was subsequently submitted at the Regulation 15 stage. It is also pointed out the spatial strategy set out in LAV13 would comfortably accommodate the identified district level housing requirement figure for the plan period.

We do not dispute that the now ‘indicative’ housing requirement figure for Lavenham (118 dwellings) has almost all been met through existing permissions. With regard to the ‘cap’, our latest position on this is the policy as drafted would not place a cap on development proposals at 12 units given that this is only a ‘community preference’. The point we would now like to make is that this and other plan policies which, for example, require integration with the existing built form and recognition of the defined landscape sensitivities, may be more effective at limiting site sizes but the Parish Council and other local interest groups ought to recognise that a consequence of this could be less infrastructure and less affordable housing being delivered in Lavenham.

LAV 14: Housing mix – meeting local needs

We note and support the change to part 2 of this policy which now ‘*encourages*’ rather than ‘*expects*’ new dwellings to be built to M4(2) standards.

With regard to part 1 of the policy, and given that paragraph 7.5.5 identifies a need for 1-bed units, **perhaps** the Parish Council could consider, and make it known if they would open to a modification to the policy that also includes a reference to 1-bedroom properties or to instead refer to ‘the latest evidence on housing needs’, rather than seeking to specify unit sizes in policy.

LAV 16: Allocation of First Homes

We note that, amongst other change, Policy LAV16 has been amended to now only refer to First Homes.

Please note that the District Council is not currently required to secure First Homes; the transitional arrangements set out in the Planning Practice Guidance apply.

The Planning Practice Guidance sets out that neighbourhood planning groups may apply local connection requirements for securing First Homes². Whilst the Council would not normally support parish connection requirements for affordable homes; given that this tenure is not aimed at those in the most acute housing need, the Council will not object to this provision. However, it may be worth noting that a parish connection may make First Homes challenging to sell. Paragraph 7.5.2 notes provisions for when a local resident does not take up a unit. For the sale of First Homes, the Council will require marketing for a period of time before allowing sale to someone from farther afield.

Given that First Homes are not a rented or shared ownership project, the accuracy of the policy could be improved by making the following change:

¹ <https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Lavenham-NP2-Res-Schemes-Size-Note.pdf>

² <https://www.gov.uk/guidance/first-homes> [Paragraph: 008 Reference ID: 70-008-20210524]

Where they are being provided, First Homes, will normally be subject to a **strong** local connection, meaning that people with a strong local connection to the Parish and whose needs are not met by the open market will be first to be offered the **tenancy or shared ownership of the home** chance to buy the property.

LAV 17: Affordable housing on rural exception sites

The only change to this policy over its R14 predecessor is a re-write of the second sentence in part 2. The Consultation Statement (e.g., Table 6 Key Changes on page 28) explains that this was done in order to address our earlier concerns. To be consistent with our recommendation re policy LAV16 we suggest that the word 'strong' is not necessary.

Turning back to part 1 of the policy; and effectively a repeat of the issues we have with LAV13, while we understand that the intention of the 12 unit cap is based on local opinion, **we ask the Parish Council** to reflect on how this relates to assessed needs for affordable housing and the contribution which this Plan is making to the achievement of sustainable development.

Policy LAV 18: Supported Housing

LAV18 is another policy that seeks to impose a 'no more than 12' cap on the, in this case, number of supported housing units coming forwards. We mentioned this in our R14 response and repeat it here. The need for economies of scale in specialist housing schemes may mean this cap could greatly restrict the types of specialist housing which might otherwise come forward by rendering proposals unviable. There is also a potential argument this does not contribute to sustainable development, nor would it help LNP2 meet its objectives around providing opportunities for older households to downsize.

In a **supplementary question to the Parish Council**, is the intention of Part 2 of the policy that the age cap be applied across all types of supported housing that may come forward? What about the provision of housing for children or adults with learning disabilities, or those with poor mental health, or early onset dementia ... i.e., anyone younger than 60?

Finally, is it also intended that proposals for housing with care also be restricted to those with a connection to Lavenham or neighbouring parishes?

Policy LAV 28: Protecting and supporting Public Houses in the parish, and

Policy LAV 29: Protecting and supporting Lavenham's Retail Core

In our R14 response we recommended that both policies refer to a marketing period of 6 month, not 12 months as was and as is still stated. In response (Consultation Statement Appendix 7, pdf page 165) we are advised that there is no evidence to justify this change.

While it is not yet adopted policy, we note that LNP2 does refer elsewhere to the Joint Local Plan March 2023 Modifications document. Proposed JLP Policies LP10(2.a) and LP28(3.a) both set out that evidence for the partial or full loss of the facility should include, amongst other things, proof that it has been the subject of a sustained marketing period of at least 6 months.

Making this small change to LAV28 and LAV29 would, we suggest, ensure that LNP2 will be in general conformity with district policy over the plan period and avoid potential confusion for owner, developer and decision maker alike.

LAV 33: Designated heritage assets and their setting

Our Heritage Team have suggested that the inclusion of a map showing the spread/concentration of the Listed Buildings would be useful. We do have such a map, a copy of which is appended to this representation. To minimise disruption, this could be included as a new appendix to the plan.

* * * * *

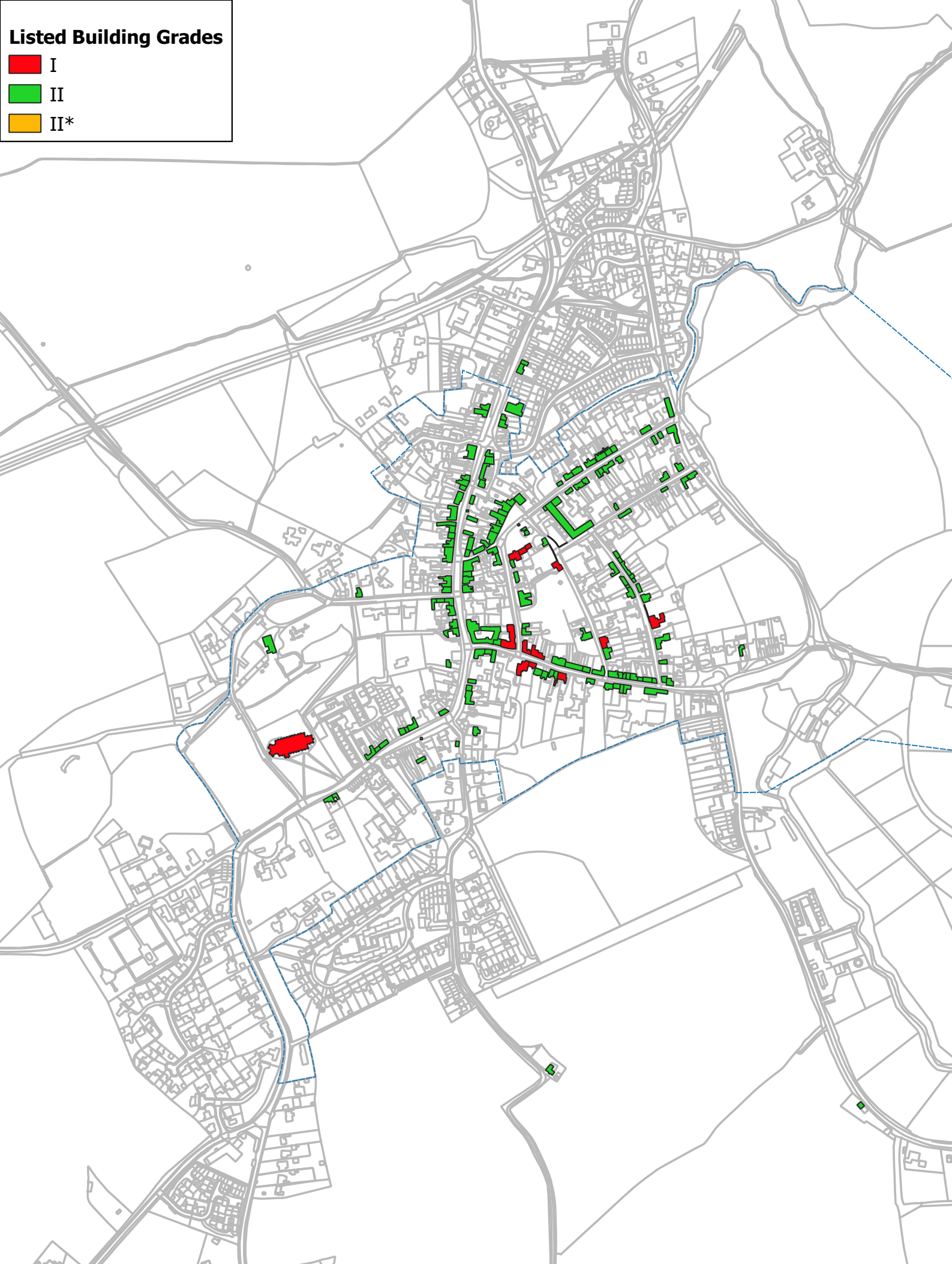
We trust that all of our comments are helpful and would be happy to answer any further questions you may have.

Yours sincerely

Paul Bryant
Neighbourhood Planning Officer
Babergh & Mid Suffolk District Councils
T: 01449 724771 / 07860 829547
E: communityplanning@babermidsuffolk.gov.uk

Listed Building Grades

- I
- II
- II*



Listed Buildings within Lavenham
 Babergh and Mid Suffolk District Councils



SCALE :
 1:6000

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 number 100023274

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(3) NATURAL ENGLAND

Date: 15 August 2023
Our ref: 441060
Your ref: Lavenham Neighbourhood Plan



Mr Paul Bryant
Babergh & Mid Suffolk District Councils

BY EMAIL ONLY

paul.bryant@baberghmidsuffolk.gov.uk

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Crewe Business Park
Electra Way
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T 0300 060 3900

Dear Mr Bryant

Lavenham Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 30 June 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.



Paul Bryant
LNP2 Consultation, c/o Spatial Planning Policy Team
Babergh and Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

14th July 2023

Dear Paul,

RE: Lavenham Neighbourhood Plan 2 – Regulation 16 Submission Consultation

Thank you for sending us details of the next stage of the Lavenham Neighbourhood Plan, we have the following comments:

The Lavenham Neighbourhood Plan, through Policy LAV8, LAV 9, and LAV 10, which are united under Objective 6 recognises and seeks to protect and enhance biodiversity value within the parish; this is once again welcomed by Suffolk Wildlife Trust. We also note that our comments on the previous draft relating to key species within the parish have been taken on board and included within LAV 9, which we are pleased to see.

We particularly welcome the reference under Policy LAV10 Point 2 which promotes Biodiversity Net Gain going beyond the minimum of 10% and aims to achieve 20% will be supported. This is something we are keen to advocate in all such plans.

A minor comment would be to note that I believe that the last sentence of Point 2 here should read “*Appropriate measures for delivering Off-site BNG in the parish could...*” which would consider that in a majority of instances the best practice for Biodiversity Net Gain is to deliver units onsite.

We also wish to show our support for Objective 7 which seeks to reduce the carbon footprint of the Parish.

Yours sincerely

Alex Jessop
Planning & Advocacy Officer

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(5) NATIONAL HIGHWAYS



Our ref: Lavenham Reg 16
Your ref:

Neighbourhood Planning Office
Babergh and Mid District Councils
Endeavour House,
8 Russell Road,
Ipswich
IP1 2BX

Via Email
communityplanning@baberghmidsuffolk.gov.uk

Dear Sir,

Lavenham Regulation 16 consultation

Thank you for your consultation.

We welcome the fact that the promotion of sustainable development and transport is promoted in your plan despite the challenges thrown up by the rural nature of the area.

The focusing of development adjacent to the existing settlement is possibly the option which would have the least impact upon the SRN. The impact of these proposals should have been picked up in the evidence base for the District Local plan.

Yours faithfully

Mark Norman
Assistant Asset Manager
Operations (East)
Email: mark.norman@highwaysengland.co.uk

Mark Norman
Operations - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: 0300 470 4938

14 August 2023

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(6) ANGLIAN WATER

From: [Tessa Saunders](#)
To: [BMSDC Community Planning](#)
RE: Notice of consultation - R16 Lavenham NP2 (Babergh DC) 14
August 2023 10:50:16
Subject: [~WRD0002.jpg](#)
Date: [image001.jpg](#)
Attachments: [image003.jpg](#)



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Good morning Paul,

Thank you for consulting Anglian Water on the Regulation 16 Submission Version of the Lavenham Neighbourhood Plan.

The consultation statement and Submission Neighbourhood Plan has been reviewed, and Anglian Water welcomes the amendments made to policies and supporting text, as a result of our feedback on the Regulation 14 pre-submission version. We are supportive of this comprehensive neighbourhood plan in seeking to guide sustainable and resilient development in Lavenham.

Kind regards,

Tessa Saunders MRTPI

Spatial Planning Advisor – Sustainable Growth
Quality & Environment

Mobile: 07816 202878

Web: www.anglianwater.co.uk


Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire, PE29 6XU

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(7) WATER MANAGEMENT ALLIANCE

From: Planning Department <planning@wlma.org.uk>
Sent: 30 June 2023 15:23
To: BMSDC Community Planning
Subject: RE: Notice of consultation - R16 Lavenham NP2 (Babergh DC)

 **EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Good Afternoon,

Thank you for your consultation on the Lavenham Neighbourhood Plan 2023-2037. The parish in question lies outside the Internal Drainage District of the East Suffolk Internal Drainage Board as well as the Board's wider watershed catchment, therefore the Board has no comments to make.

Kind Regards,



Will Chandler BSc (Hons), MCIWEM

Sustainable Development Officer

Water Management Alliance

m: 07826 940760 | dd: 01553 819630 | William.Chandler@wlma.org.uk

Registered office: Pierpoint House, 28 Horsley's Fields, King's Lynn, Norfolk, PE30 5DD
t: 01553 819600 | e: info@wlma.org.uk | www.wlma.org.uk

WMA members: [Broads Drainage Board](#), [East Suffolk Drainage Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#), [Waveney, Lower Yare and Lothingland IDB](#) in association with [Pevensey and Cuckmere Water Level Management Board](#)

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(8) AVISON YOUNG (obo National Grid)

**AVISON
YOUNG**

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avisonyoung.co.uk

Our Ref: MV/ 15B901605



11 August 2023

Babergh District Council
communityplanning@baberghmidsuffolk.gov.uk
via email only

Dear Sir / Madam

**Lavenham Neighbourhood Plan - Regulation 16 Consultation
June - August 2023
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:



Matt Verlander, Director

nationalgas.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Kam Liddar, Asset Protection Lead

kam.liddar@nationalgas.com

National Gas Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

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(9) DEFENCE INFRASTRUCTURE ORGANISATION (obo MOD)



Defence
Infrastructure
Organisation

Christopher Waldron
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: Lavenham
Neighbourhood Plan

Mobile: +44 (0) 7800 505824

E-mail: [DIO-Safeguarding-
Statutory@mod.gov.uk](mailto:DIO-Safeguarding-Statutory@mod.gov.uk)

Our reference: 10059293

christopher.waldron861@mod.gov.uk

Paul Bryant
Neighbourhood Planning Officer
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

18th August 2023

Dear Paul

It is understood that Babergh and Mid Suffolk District Councils are undertaking a consultation regarding their Lavenham Neighbourhood Plan 2023 - 2037 under Regulation 16. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

The MOD may be involved in the planning system both as a statutory and non-statutory consultee with statutory involvement stemming from consultation occurring as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

The area covered by the Lavenham Neighbourhood Plan will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. Wattisham Station is located to the West of the Lavenham Neighbourhood Plan authority area and benefits from safeguarding zones drawn to preserve the airspace above and surrounding the aerodrome to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. New development may have detrimental impacts depending on site location relative to safeguarded sites and assets. Additionally, Wattisham Station is washed over by a statutory birdstrike safeguarding zone, designed for birdstrike risk to be identified and mitigated.

Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, such as green and/or brown roofs/roof gardens on flat roof buildings, as well as the creation of new waterbodies. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated ponds, basins and wetlands provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

Additionally, the MOD have an interest within the plan area, in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Lavenham Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated

Where development falls outside designated safeguarding zones, the MOD may have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include renewable energy development such as the installation of wind turbine generators or solar photo voltaic panels, or any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft. Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and

glare to the detriment of aviation safety. Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more.

The MOD should be consulted within the Lavenham Neighbourhood Plan 2023 – 2037 on any development within the statutory technical safeguarding zones that surround the East 2 WAM network and/or Wattisham Station which consists of structures or buildings exceeding statutory safeguarding technical criteria, or any development in the statutory birdstrike safeguarding zone surrounding Wattisham Station which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager

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(10) THE LAVENHAM PRESS LTD

Consultation Response Form

Lavenham Neighbourhood Plan 2023 - 2037

Regulation 16 of the Neighbourhood Planning (General) Regulations
2012 (as amended)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr. Terence Dalton
Job Title (if applicable):	Chairman
Organisation / Company (if applicable):	The Lavenham Press Ltd
Address:	Arbons House 47 water Street Lavenham Sudbury Suffolk
Postcode:	CO10 9RN
Tel No:	01787 247436
E-mail:	terence@lavenhamgroup.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	LAV31
---------------	--	------------	-------

Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	X
Support with modifications		Have Comments	

Please give details of your reasons for your opposition, or make other comments here:

- The Lavenham Press of which I am owner and Chairman is the subject of Policy LAV 31.
- Policy LAV31 singles out a specific location in isolation and seeks to predetermine the outcome of any future planning application, thereby removing the right of a proper democratic planning process.
- No other single locations are similarly treated.
- Policy LAV 31 is not compliant with current NPPF guidelines.
- Policy LAV 31 is a late addition to LNP2 and was not present on earlier draft versions that had been available for public scrutiny.
- There is no evidence of support for Policy LAV31 from the wider community.
- Public unaware of this late addition.
- Therefore, not valid.
- Unfair and disproportionate.

Please see attached document reference: Consultation Letter

Subject: Consultation response to late introduction of Policy LAV31

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

As the subject of Policy LAV31, on behalf of The Lavenham Press, I strongly oppose it and suggest it is removed in its entirety, and all reference to it, from LNP2.

Please see attached separate sheet ref: Consultation Letter.

Subject: Consultation response to late introduction of Policy LAV31

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

As requested, I have kept my response very brief however if further information is required, I would welcome the opportunity to defend our business against this unfair and undemocratic action at a hearing with the independent examiner.

I can be contacted.

By e mail; terence@lavenhamgroup.co.uk

By Post: (marked Private and Confidential please)

Terence Dalton
Chairman, The Lavenham Press Ltd.
Arbons House
47 Water Street
Lavenham
Sudbury
Suffolk
CO10 9RN

Mobile: 07973304193
Office: 01787247436

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of LNP2 by Babergh District Council	x

Signed: Terence Dalton

Dated:7th August 2023

To: The Examiner of The Submission Version of Lavenham Neighbourhood Plan 2
From: Terence Dalton, Chairman, The Lavenham Press Ltd.
Subject: **Consultation response to late introduction of Policy LAV31**
Date: 7th August 2023

Policy LAV 31 refers to the premises our business occupies in Water Street Lavenham and was a late entry to the pre submission version of the Lavenham Neighbourhood Plan 2. It was added after earlier draft versions had been available for scrutiny by members of the public and it did not receive the due diligence and consultation required of the LNP2. Therefore, the support for its inclusion was limited to members of the LNP2 Group and subsequent Parish Council sign off. I am unaware of any evidence showing public support. Nor does it comply with NPPF guidelines.

Therefore, Policy LAV31 is not valid and should be removed from LNP2.

Our first opportunity to object to it was at a pre submission drop in session arranged by the LNP2 Group on 17th January 2023 where we handed a written objection, prepared by our planning consultant, to a LNP2 Group representative present at that event and later hand delivered a copy to the home of our near neighbour, the LNP2 Group Chairman.

I invited him and his wife, in her capacity as Chairman of the Parish Council, to a meeting to gain a greater understanding of our business. We later welcomed them and other representatives of the Parish Council and LNP2 Group to our premises. It was the first time I and my colleague had met with them and we had not been consulted regarding the late introduction of Policy LAV31.

We informed all those present that it remained our intention to continue trading from our current premises for the foreseeable future and that whilst we recognise the strength of feeling regarding the unsuccessful planning application on this site by a developer of retirement homes, this was only supported by us due to the current Neighbourhood Plan (2016) Retirement Housing Policy. (7.2, 7.3.1, 7.9, and Policy H6).

Following that meeting and further correspondence with the Chairman of LNP2 Group the Policy was amended to remove some conditions which would have quite likely ended a successful business with over 65 years of trading history from our current Water Street premises. However, the Chairman declined to remove the Policy entirely.

We consider this a wholly unfair and disproportionate response to an unsuccessful and now very historic planning application. It was perhaps in expectation of a follow up application but having explained at length our plans to remain at 47-48 Water Street, Policy LAV31 is neither legitimate nor relevant, and remains threatening to our business.

If sometime in the future (perhaps far into the future) the site requires repurposing, any application should be judged by democratically elected councilors using the relevant planning policies and no doubt the Neighbourhood Plan extant at that time as well as Lavenham's special status will influence their decision. As it stands however, Policy LAV31 predetermines a planning outcome which in effect denies us the right to that democratic process.

We are hopeful that after due consideration you will instruct the removal of Policy LAV31 and any reference to it in LNP2.

As requested, I have kept this very brief but as indicated on the Response Form, if it is required, I would welcome the opportunity to defend our business against this unfair and undemocratic action.

[Ends]

(11) LAVENHAM COMMUNITY LAND TRUST

Lavenham Community Land Trust.

Lavenham Neighbourhood Plan Revision (NP2)

Consultation response relative to Regulation 16 of the Neighbourhood Planning (General) Regulations, 2012 (as amended). Dated 7th August 2023.

Lavenham Community Land Trust (CLT) strongly disagrees with the published findings included in the Lavenham Neighbourhood Plan Revision document (NP2) especially as they relate to; local housing need, a lack of proper engagement with the local community and the selective nature of reporting on any consultation and third-party input. These shortcomings have led to distorted outcomes in the draft NP2.

1. About the Lavenham Community Land Trust (LCLT)

1.1 The LCLT was formed in 2014 as a Community Benefit Society for the benefit of residents in Lavenham. Our aims are to:

- Provide and manage well designed, high quality and energy efficient affordable homes.
- Provide other community assets to help employment, skills and to help our community remain sustainable.
- In 2019, we delivered in partnership with others and in particular Hastoe Housing, a development of 18 homes, 13 of which were for affordable rent and 5 shared ownership. Peek Close has won two awards, one at the local level and the other at national.
- We continue to work towards meeting the needs of our community. The proposed introduction of a cap on any development of 12 units would place an unnecessary and financial unviable burden on drawing the relevant parties together to bring to fruition a successful development such as Peek Close. The added danger is that commercial viability would tempt developers to trade down to a 10-unit development and thus avoid any social housing element. Under the current NP2 plans 12 units are far less commercially viable than 10 units.

2. Response to the Lavenham Neighbourhood Plan 2 (LNP2)

2.1 The LCLT commends the time that has gone into the preparation of the LNP2 and associated documents, and the group involved should be congratulated. However, Neighbourhood Plans are supposed to be evidence based whereas the NP2 we see before us, is suspect in this respect.

Instead, it is based on subjective views and out of date data. By way of example, the housing price data supplied by Consultant Hannah Lazarus draws similar conclusions as to that included in the current Neighbourhood Plan, that Lavenham house prices are above Babergh District, County and National averages. For instance, an entry level property would require an annual household income of £51,000. The National Living Wage is some £20,400 and the lower quartile full-time salary paid in Babergh district in 2022 was £23,800. Lavenham's economy is based around hospitality and similar low paid jobs. It follows, as Ms Lazarus remarks that 'it seems reasonable to conclude that many young people and low-income households with a connection to Lavenham and looking to get onto the housing ladder would need significant support to set-up home in their community.'. It follows that rental levels are also high.

2.2 We welcome and endorse both the Design Guide 2023 and the Lavenham Landscape Character and Sensitivity Assessment 2023. We also support much of the LNP2 strategy, particularly as it relates to protecting the unique character of Lavenham. It seeks to address the need to: flourish, evolve, be sustainable and resilient, without, however, recognising the place of people in these aims.

3. Our Submissions

3.1 Whilst the LNP2 group have consulted residents via a questionnaire, website etc, there have only been two meetings which were a few days apart and with the same agenda. We feel this is not sufficient engagement and the question and ambition raised in the NP2 of '*Without community engagement, there is no living plan, only a report on a shelf*' has not been met.

3.2 We consider that the LNP2 has failed to take account of a major challenge to the sustainable future of the community. The LNP2 should address not only the physical environment but also the village's population and demographic structure and the need of the local community for truly affordable housing is not adequately addressed. In addition, our young and sometimes older inhabitants are forced to remove themselves from their village due to insufficient available and affordable accommodation. Lavenham is not alone in facing this quandary, however, the NP2 process should give scope to address this situation not ignore it.

3.3 That omission undermines the aspiration of the LNP2 vision of '*A flourishing community, sustainable and resilient*'.

In the circumstances, it could be argued that the closing phase of the drafting of NP2 was hurried and therefore based solely on historic data and subjective views. The census data used (2011) was

known to be out of date when NP2 was first produced as was the local Housing Needs Survey. The release schedule for the 2021 census data was known and was subsequently released during the Regulation 14 period. Moreover, the June 2022 Housing Needs Survey (HNS) release date was known to the parish council and the NP2 group. This was released to them in early November 2022 and shows 99 households needing affordable accommodation. The current data provided by the HNS highlights a need for 1,2 and 3-bedroom dwellings on a far greater scale than indicated in the LNP2. Moreover, the HNS enjoyed a completion rate of 26 per cent, more than twice the level enjoyed by the NP2 questionnaire.

The deletion of the LA069 site (previously contained within the draft Joint Local Plan) from NP2 exacerbates the situation.

3.4 The selective nature of the reporting of opinions and the relatively small samples provided for NP2 should be objectively addressed. For instance, the paper entitled ‘Maximum Size of Residential Schemes’ is not evidence based (i.e. no evidence has been put forward to support the NP2 preferred maximum size of 12 units) and reports on Question 5 to the NP2 questionnaire that 5 out of 6 respondents agreed or agreed strongly with the view proffered, whereas said questionnaire enjoyed a return rate of only 12 percent of inhabitants or households (we do not know precisely). Put another way, only 10 per cent, of shall we say the population agreed. Equally, the number of people attending the 17th January 2023 event did not exceed 40. These are not an acceptable sample size. Whereas the 2022 HNS key findings were; -

	Number	%
Surveys Returned Completed (full or partial)	248	26%
Surveys Not Completed or Returned or Blank	702	74%
Total Surveys Distributed	950	100%

248 completed surveys were returned fully or partially completed via post and online. 702 surveys were not returned. The Lavenham Housing Survey 2022 achieved a 26% return rate which indicated a need for additional housing by 99 households (205 people), with respondents in favour of homes for older people, small family homes and homes for couples. The average return rate for HNS is generally between 30 - 40% which indicates that the number of responses received provide a slightly less robust sample snapshot of Lavenham parish. See CLT website at <http://lavenhamclt.onesuffolk.net/> under Housing Needs.

By comparison the vague NP2 response rate was only 12 per cent and then only 5/6ths, or 10 per cent of respondents agreed to limit housing to any degree.

Equally, the statement regarding existing small-scale schemes ignores the fact that of the four developments mentioned only one social home was provided and without any commuted sums. As for the current planning application to build six houses on the Bury Road, these are all open market homes will not qualify for providing any social homes or commuted sum. The further Southwold example is an exception site and not therefore relevant.

4. Recommendations

4.1 To address the concerns set out above we recommend the following amendments:

- The Revision nature of NP2 needs underscoring and the layers of available consultation data demonstrated (NP1, HNS 2018, NP2 survey, HNS 2022 and 2021 Census, plus the emerging JLP data, including any Strategic Housing Land Assessment). Further engagement should be undertaken to reflect a greater depth of understanding of village need and opinion.
- The evidence base thus strengthened: the LNP2 needs to consider any further outcomes and in particular, homes for people with a local need. This may comprise those with a local connection and some key workers. It follows that the 'Affordable' definition will be expanded to include truly affordable rents (or social rents) based on local earnings.
- The LNP2 needs to comply with the Local Plan and the spirit of the emerging Joint Local Plan (JLP). The district council also makes the valid comment that exception sites should be available in a wider context than merely adjacent to the Built-Up Area Boundary and this needs to be recognised.

5. Conclusion

5.1 The LCLT is supportive of much of the report but feels that changes are required to enable the Lavenham Neighbourhood Plan to address its four themes, meet the overall vision set out and address the needs, hopes and aspirations of villagers.

5.2 The LCLT has been happy to collaborate with the LNP2 group to assist with amendments and has met with the NP2 group, addressed the parish council and made written submissions. All to no avail. None of our comments above therefore should be 'news' to those two parties.

Lavenham Community Land Trust

7th August 2023

(12) BROOKS LENEY (obo Ms Green)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title/ Name:	David Brooks
Job Title (if applicable):	
Organisation / Company (if applicable):	Brooks Leney
Address:	Hyntle Barn, Hill Fann, Hintlesham, Ipswich
Postcode:	IP83NJ
Tel No:	01473 831531
E-mail:	db@brooksleney.co.uk

Part B: Agents - Please complete details of the client / company you represent	
Client/ Company Name:	Mrs E. Green
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	LAV13
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	X
Support with modifications		Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

Map 7 ignores the proposals in the emerging Babergh & Suffolk joint Local Plan which includes additional residential allocations.

By severely restricting development in Lavenham the policy prevents achieving solutions to other problems identified in the Plan (e.g., parking, new school, traffic, availability of dwellings to meet the need of existing local people etc).

The Babergh affordable housing requirement only applies to developments of 10 or more dwellings, so limiting development in Lavenham to proposals for up to 12 dwellings effectively limits the likelihood of affordable housing being provided as part of any market let development.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

1. Revise Map 7 to include the proposals in the emerging Babergh & Mid Suffolk joint Local Plan.
2. Do not try to restrict development to just 12 dwellings but instead explain to local people why large developments are of greater benefit to the community.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...
I do not consider that a hearing is necessarily required.
<i>(Continue on separate sheet if necessary)</i>

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input type="checkbox"/>
The final 'making' (adoption) of LNP2 by Babergh District Council	<input type="checkbox"/>

I Signed: 	I Dated: 14.8.2023
--	-------------------------------------

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	LAV14
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	X
Support with modifications		Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

An aging population such as exists in Lavenham needs the availability of sufficient numbers of dwellings to allow older people to downsize and so free up larger properties for those with families, which will also support other facilities in the village including the school.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Support larger scale development proposals to ensure an adequate supply of the mix of dwellings needed within Lavenham to allow locals to downsize and so free up larger dwellings and also for young couples to start on the housing ladder.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

I do not consider that a hearing is necessarily required.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	
The final 'making' (adoption) of LNP2 by Babergh District Council	

I Signed:



I Dated: 14.8.2023

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	LAV17
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	X
Support with modifications		Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

It appears that the need identified for affordable housing will require many such small-scale schemes. Larger, market led schemes will be likely to prove more attractive to developers and concerns raised within the Plan over the quality of new development can be properly addressed at the planning stage. Such schemes are also more likely to contribute to the provision of other identified community needs.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The current need identified within the survey suggests that the proposals fall woefully short of meeting that need. Whilst the provision of more scale exception sites is applauded these will not solve the problem that has been identified and greater focus needs to be made on the provision of an adequate mix of affordable housing within large scale developments.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

I do not consider that a hearing is necessarily required.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	
The final 'making' (adoption) of LNP2 by Babergh District Council	

I
Signed:



I **Dated: 14.8.2023**

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(13) Resident – Mr Aspa

E from: Mr Aspa

Rec'd: 15 August to 18 August 2023

Subject: LNP2

Note: Babergh District Council received six separate e-mails from Mr Aspa during the consultation period. His representations on LNP2 are set out below:

PARK ROAD

First dated 15 August. Resent 18 August 2023

I came from London in 2009 to live in Park Road, [...]. Park Road is 1km long, a very popular rural amenity, close to the village centre. Whereas the east side is protected by ALLS and DVs, **against all expectations LNP2 would permit a *small number*** (LNP2 Chairman's email of **27/4/23**) **of isolated high-value homes of exceptional quality to be built on the west side of Park Road**. The Parish Council Chairman also wrote (**18/7/23**) to support this proposal.

The full implications of LNP2 for Park Road have never been explained to Lavenham's residents. As a bare minimum the conclusions of the full review should have been available for residents to comment before submission to Babergh District Council.

Correspondence with LNP2 Chairman

Building on this quiet, recreational lane would inevitably detract from its attractions, I therefore wrote on **31/1/23** to request that ALLS and/or DVs should be assigned to both sides of Park Road up to the entrance of Bright's Farm Road.

'All Lavenham homes are no more than 5/10 minutes walk from open countryside. It is **currently** possible to walk the whole length of Park Road to Bright's Farm private entrance with little traffic interference and open fields and views on both sides. This cul-de-sac is very popular with visitors, residents, runners, hikers, dog walkers, families with young children, young cyclists and horse riders. It provides many alternative routes for casual and serious walkers - access to the Railway Walk and beyond to the aerodrome or to Long Melford - circular walks from View 3 round the fields to looking south-west over distant rolling fields, or cross over to Frogs Hall Road to the ford and then onto Lavenham Hall Farm, returning via Preston St Mary to Lavenham.'

Roy Mawford, Chairman of LNP2, subsequently wrote on **29/3/23** that all land east of Park Road was scheduled to be protected from future development by ALLS and DV. However, on the west side the land was only protected up to the first gate, about 100yds from the junction with Hall Road.

He also stated that ' Our proposed Settlement Boundary, our ALLS proposal and our DVs are all intended (among other things) **to protect Park Road as far as possible from further development.**' I interpreted this as **development is possible on the west side of Park Road up to the junction with Bright's Farm Road**.

On **10/4/2023** I replied, with **copy to the Parish Council**, the comment 'to protect Park Road as far as possible from further development seems diametrically opposed to the stated aims in LNP2, reference LAV 37 -

- 1e. Development resulting in obtrusive break of the countryside will not be supported.
2. Protecting the tranquillity and rural character of the lanes at Bears Lane, Clay Lane and Park Road due to their importance as walking routes into the settlement.

and

Policy intention

8.5.1. The purpose of Policy 37 is to protect and enhance settlement and landscape character at the village gateway points where it is strong and to seek and strengthen these points where character is lacking.

8.5.2 Village fringes are particularly sensitive at gateway/arrival points to a settlement.'

The Chairman replied on **24/4/23** that 'the key proposed policy in relation to rural development ... is LAV 13 (Spatial Strategy)' - reference National Planning Policy Framework July 2021 Para 80. *Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*

(e) the design is of exceptional quality, in that it:

- is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas: and

- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.'

The unstated conclusion by the Chairman is that LAV 13 over-rules LAV 37. It therefore follows that **the west side of Park Road, where it is not protected by ALLS nor DVs, could be at risk from this type of high-value home.**

On **25/4/23** I wrote to the Chairmen of LNP2 and Parish Council (**26/4/23**) that very few people knew about possible development on Park Road. 'It is also concerning that despite the roll-out of many statistics, graphs and other information, there is no indication of how many people use Park Road for recreational purposes. It is really surprising that a survey has not been commissioned to provide this information. I believe this is a mistake and should be rectified before the Parish Council approves LNP2. Given the importance of LNP2 and the strong possibility that it will be used as a reference point for decades to come, I believe a few months postponement should be agreed by both your team and the Parish Council.'

The LNP2 Chairman responded on **27/4/23** that 'the LNP Revision group may not have undertaken surveys of the number of people who use Park Road for recreational purposes, but we are fully aware of this Gateway's amenity value (and the amenity value of the other three rural Gateways). We see no reason to delay a decision on whether our most recent draft LNP2 should be submitted to Babergh District Council.'

The Parish Council Chairman also agreed with this view (**18/7/23**). Both Chairmen are clearly oblivious that being 'fully aware' is insufficient evidence on which to base decisions which are intended to be relevant until 2037. Decisions of this importance should always be supported by a comprehensive survey, with data which would either endorse or refute a proposition.

A brief description of each of the four Rural Gateways follows:

Park Road - this cul-de-sac is very popular with visitors, residents, runners, hikers, dog walkers, families with young children, young cyclists, horse riders and walking groups. It provides many alternative routes for casual and serious walkers. Fully protected on the east side, but only the first 100yds on the west side. It is also by some distance the most attractive of the four Rural Gateways.

Frogs Hall Road (protected on both sides by ALLS). Described as a 'rat run' for drivers branching off the A1141 bypassing Lavenham centre and travelling to Brent Eleigh, Preston St Mary and further afield.

Clay Lane (protected on both sides by ALLS). Only suitable for fit walkers.

Bears Lane (protected on the east side by ALLS, but not on the west). Narrow twisting lane, only suitable for fit walkers.

Every person I spoke to was opposed to development along the west side of Park Road. Some were indignant that this was a possibility. The Parish Council Chairman informed me that I was the only respondent who had raised this issue. Naturally I take a special interest in Park Road because I live there. Otherwise, I would have assumed, as apparently everyone else did, that the Review Group would be protecting the best interests of the village community.

***To find out what was proposed for Park Road it was necessary to:

1. First understand the structure and methodology of the report (126 closely packed pages plus appendices and references to other documents).
2. Refer to page 78 for definition of ALLS and page 81 for their locations - note the small map and difficult to locate Park Road.
3. Refer to page 82 for definition of DVs and page 84 for locations - note the west side is not protected after the first approximate 100yds by either ALLS or DVs.
4. Refer to LAV 37 (page 86). That looked promising, but not conclusive.
5. Write to LNP2 Chairman for confirmation.
6. Chairman responded that LAV 13 over-rules LAV 37. Subject to certain conditions, development would only be supported in a very small number of exceptional cases.

It is hardly surprising that I was the only one to raise the issue of development on Park Road.

The Parish Council Chairman commented (**18/7/23**) that there would be no point in extending protection along the west side of Park Road because ALLS could be over-ruled by Clause 3 of Policy LAV 35. Which begs the question why any of the Gateways are protected by ALLS? It would also appear that the door has been deliberately left open on Park Road for developers.

The Parish Council Chairman also stated (**18/7/23**) that the draft plan is a revision of the 2016 plan. It is an update and not a new plan and there was no reason why the scope of the Review Plan should be extended since there was no quantifiable aspiration from the community for this to be done (see *** above). This sentence shows the complete failure of the Chairman to understand the importance of Park Road as a recreational amenity for the community. Had she done so, the 'quantifiable aspiration' would have been recognised.

All emails are available if required.

BRIDGE STREET ROAD MAP 14 page 81

First dated 17 August. Resent 18 August 2023

This map illustrates how ALLS protects the eastern side of Lavenham in contrast to the flat land to the west which could be of great interest to developers:

- **Land to the east** of A1141 and then east of the junction with Bears Lane is protected by ALLS to the Parish boundary.

- **Land to the west;** only an area to the west (LR4, page 80) is protected by ALLS and by a east orientated DV (3 map15 page 84) where Park Road meets Bright's Lane.

From the bridge at Bridge Street Road looking east towards the church, the view is neither protected by ALLS nor by DVs. This pastoral land (LR3, page 80) is probably largely unchanged since medieval times and failure to protect it from developers could have **very unfortunate consequences** for Lavenham. The Brent Eleigh Road (A1141) is designated as an ALLS, but Bridge Street Road is not, both should be. If ALLS is precluded, DVs should be positioned at the bridge facing the church and encompassing all land east and west of Bridge Street Road.

BEARS LANE

First dated 17 August. Resent 18 August 2023

Bears Lane is one of Lavenham's four Rural Gateways. It is an important link to long circular walks to Brent Eleigh and returning to Lavenham via Preston St Mary. The east side of Bears Lane is protected by ALLS but not the west, both should be.

AFFORDABLE HOUSING

First dated 17 August. Resent 18 August 2023

LNP2 is commendably opposed to infill. This policy is important to protect the integrity of the village settlement. However, it appears to leave unresolved where affordable housing could be built. I'm surprised that the Review Team did not suggest new houses either along Sudbury Road or Melford Road.

PRIMARY COMMUNITY SCHOOL

Dated 18 August 2023

Ultimately village schools should be amalgamated and children moved to modern buildings providing the latest high-tech teaching facilities. LNP2 should make this a priority to BDC.

AUTONOMOUS VEHICLES

Dated 18 August 2023

Lavenham should plan for the near future when autonomous vehicles (AV) will be the norm. This will offer radical opportunities for Lavenham to preserve its thousand year history:

1. Vehicles currently parking in the streets could park outside the village in a secure central location (SCL). Owners would either take the AV (circulating between the village and SCL), or signal a car to their home.
2. Visitors and employees travelling by car, could park at the SCL and take the AV to Lavenham.
3. State schools could be built in open country side offering the best opportunities for education and sport as enjoyed by private public schools. AVs would replace the school run.
4. Ultimately, all traffic movements would be controlled by satellites which would enable popular tourist destinations to limit the number of visitors at any one time.

[Ends]

(14) Resident – Mr Baker & Ms Stefanska

By e-mail

Rec'd: 11 August 2023

Subject: Lavenham Neighbourhood Plan 2 (LNP) - Park Road

We understand Lavenham Parish Council (LPC) approved the above plan on 27 April last, and that it is about to be submitted to Babergh District Council (BDC) for consideration.

We are Lavenham residents and it has very recently been drawn to our attention that LPC has refused, before submitting its plan, to reconsider its decision not to extend ALLS protection to the west side of Park Road from the entrance to the first gate about 100 yards from the junction with Hall Road up to the private road to Brights Farm. Nor will it agree to postpone submission of its plan to BDC for this and other proposals to be more fully discussed.

All Gateways to the village are familiar to us and all are protected by ALLS except most of the west side of Park Road. Why?

We walk the entire length of Park Road several times a week and in our opinion and that of others to whom we have spoken it is more attractively rural and secluded than the other Gateways and that any further development would obviously disturb its rural character and tranquility. We have observed that it is used by a great number of walkers with and without dogs at all times of the year.

We believe LPC Plan 2 should be amended to extend ALLS protection to all of the west side of Park Road or that, if submitted minus this protection BDC should reject the plan or amend it to include complete ALLS protection to the west side.

In view of the fact that development in the countryside may be permitted provided the design is of exceptional quality, etc, etc, there is therefore a possibility that permission might be sought and granted in the future. The refusal to extend protection therefore raises suspicion that such development is in fact contemplated.

It has been speciously suggested by an official that to extend ALLS protection to the remainder of Park Road would be pointless since the grant of permission to erect such a building would overrule any ALLS designation. If this is so at least ALLS would provide an additional level of protection if permission were given and an appeal were to be contemplated.

And if ALLS protection is allegedly so weak, why introduce it anyway anywhere? It would hardly be a reductio ad absurdum to suggest that ALLS protection is pointless, but of course this cannot be so. We hope BDC will take these remarks into consideration.

Mr Baker & Ms Stefanska

[Ends]

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(15) Resident – Mr Burton

By e-mail

Rec'd: 13 August 2023

Subject: Lavenham Neighbourhood Plan 2

Dear ...

Herewith my comments on the draft plan which I would like taken into consideration by Babergh Council when the draft plan is reviewed.

I am one of the trustees of the Lavenham Community Land Trust and I am aware that there is a pressing need to provide affordable housing in Lavenham Village. This need is evidenced by the independently prepared Housing Needs Survey in 2022. In addition, with Lavenham's large older demographic and consequent higher than average house prices than pertain in Babergh District and Suffolk County, it follows that many young people and low-income households are being excluded from living and working in the village.

The aim of the Neighbourhood Plan is to map out the longer-term sustainability of Lavenham which must by definition cover the needs of all sectors of our community. The Neighbourhood Plan 2 gives little or no recognition of the affordable housing need and indeed specifically makes proposals counter to it. Small housing developments of ten or less homes do not require a proportion (normally 35%) to be set aside for affordable housing. NP2 proposes a limit of twelve homes per development which makes it attractive to developers to argue for a reduction in numbers to only ten with no affordable housing content. Whereas a larger development of perhaps twenty four homes will make it economically more attractive for developers as they are able to mitigate the cost to them of the required affordable housing element.

The very low response rate to the questionnaire for NP2 (reported to be 12 %) together with the similarly low level of public engagement has led to unsubstantiated conclusions and should be redrafted to reflect a considerably higher level of involvement by those affected.

[Ends]

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(16) Resident – Mr Churchyard

By e-mail

Rec'd: 17 August 2023

Subject: Lavenham Neighbourhood Plan - Regulation 16

Dear ...

I wish to make some comments on the whole plan and process itself rather than any particular paragraph or page.

I took the time to try and read the draft of the Lavenham Neighbourhood Plan during the 1st consultation stage, the plan is difficult to digest due to its length and complexity. There appears to be far too many policies, community initiatives and projects for anyone to fully understand what is in front of them. The task of reading the plan is made more difficult with the need to often cross reference the two other accompanying documents that have been produced.

I am concerned that the basis for the majority of the revision is from the 2021 questionnaire that only 246 people took part in from the Lavenham community. Based on the 2021 census data this is only around 13% of the Lavenham population. I myself took part in the questionnaire but I don't think this is a large enough percentage of the community to justify the level of revision and change from the original plan, it feels more like a total rewrite. Only one drop in event was held during the draft consultation period on a cold evening between 4pm and 7pm in the middle of January. Given the low turn out to the questionnaire I feel there needed to be more drop in events held with at least one held during daylight hours to allow more people to have attended and allow the public to be able to engage with the plan and the team that have produced it. At the drop in event several questions were unable to be answered and we were asked to write in any queries within our consultation response. I was disappointed that I didn't receive any response to some of the points I raised.

Overall I feel there has not been enough public engagement with the residents of Lavenham for the Neighbourhood Plan revision. Lavenham Parish Councillors were offered seminars to help the councillors understand the revision but the general public whose responsibility it is to vote at a referendum have only had one drop in event with some of the Neighbourhood Plan team. Even this consultation with Babergh does not appear to have been well publicised in Lavenham.

Overall I feel I would have to oppose the adoption of the revision based on the points above. I feel many residents in Lavenham will not be able to understand the plan due to its size and complexity and therefore makes it almost impossible to expect them to be able to vote yes or no in a referendum vote.

Any improvements or modifications I would suggest would be to simplify the plan and go back a few steps in the process and allow people more time to fully understand the revision with more drop in events or even public seminars.

Many Thanks

[Ends]

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(17) Resident – Ms Farmer

By e-mail

Rec'd: 7 August 2023

Subject: RE: LNP2

I am writing to object to the building of new, isolated, high value houses of exceptional quality on the west side of Park Road, Lavenham on unprotected land after the first 100 yards from the junction with Hall Road. This was approved by the Lavenham Parish Council on 27th April 2023 and vetted by Babergh District Council.

The Parish Council did not make Lavenham residents aware of this proposal to build on one of the Village Gateways which is a Rural Lane and designated Walking Route. A survey of residents' opinions was not carried out. I was only recently informed of this proposal and I imagine that most residents will be unaware that we only have until 18th August to place our objections.

The proposed building would ruin this safe walking route which many residents use (myself included). Until now, very few cars use this no-through road, which would have to be widened, pavements added and services connected. The result would be danger, noise and pollution from much increased traffic.

At the moment, all of us can safely enjoy this lane with its peace and the wonderful country views, unique to our beautiful village. It is wrong that only very few people would be able to afford to live in such a privileged situation, altering it irrevocably for us and future generations.

It also seems to me to be immoral not to be concentrating instead on building "affordable" housing in Lavenham.

I hope this plan will be shelved and that ALL the land on the west side of Park Road will be protected.

[Ends]

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(18) Resident – Mr Heeks

By e-mail

Rec'd: 17 August 2023

Subject: LNP2 consultation

Comments on the LNP2.

As a Lavenham resident and business owner I felt it my duty to try and read and understand the process of the revision document. After much time spent on my computer I gave up as the complexity of trying to understand technical jargon combined with flipping from various chapters and sub sections far to hard to understand. Eventually I acquired a printed version but it was still a long laborious task trying to understand it.

If Babergh and the examiner seriously want the general publics opinion on these documents then please make it:

- a) Easier to read and understand
- b) More accessible, not just online.
- c) Not just one drop in event on the coldest night of the year.
- d) Give each household in the village a simplified printed version.

After the drop in meeting in January, which I attended, I took the time to email my responses to them but apart from an acknowledgement I heard nothing back from them. I start to feel that the future of our village is being directed by a very well meaning group, but using a very small amount of statistical data and a very limited amount of public input.

I understand that the next stage of consultation will be a yes or no vote on whether to adopt the revision of the plan. How are we expected to give such a simple answer to such a complex document?

Many Thanks.

[Ends]

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(19) Resident - Posner

Consultation Response Form

Lavenham Neighbourhood Plan 2023 - 2037

Regulation 16 of the Neighbourhood Planning (General) Regulations
2012 (as amended)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Professor
Job Title (if applicable):	same
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.	ALL	Policy No.	
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	oppos e
Support with modifications		Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible...

I write the following as one of the people who prepared the original instrument for the eliciting of information and the methodology of its application for the Lavenham Neighbourhood Plan. I was asked to do so as a resident of Lavenham and in my capacity of a university professor responsible for research methodology training at the Ph.D. level and a consultant for the OECD, Organisation of American States, government of México and the joint México-UK doctoral and research programme in research.

Formally the revision and updating of the original Neighbourhood Plan for Lavenham complies with the rules and regulations set out by the authorities.

However, it fails to comply with the aims, intent, and spirit of such an operation and still less with the basic rules of scientific methodology.

Its rate of response (15% as calculated on the pre-2021 census returns and 12% based on recent returns) is far below what professionals would accept as being valid and reliable. Any statistical conclusions from such an information gathering operation are universally regarded as both unreliable and invalid.

Moreover, the response rate of the revised Neighbourhood Plan is about just over one fifth of that of the original Neighbourhood Plan. Why this precipitous drop is an important question to consider and requires an answer. Whether the fall was due to the instrument for gathering information or the manner of collection of data is an interesting question because the aim behind the setting up of the development of neighbourhood plans was to measure and elicit the wishes of the community and to use an instrument for eliciting and collection information that would serve as a means to stimulate the community to identify and propose solutions to its perceived problems. This has not been accomplished.

This is what is meant by its failure to not only not respect the rules of scientific method and secondly not respect the intent and spirit of constructing a Neighbourhood Plan.

Hence, the revised plan in its current state obviously requires revision.

Secondly, basic data available through the census and other statistical collection agencies have not been used. Since 2017 a postcode-by-postcode analysis of levels of income in Lavenham has been available and no reference is made to it or any cognate document. The proposals in the revised Neighbourhood Plan do not have a firm statistical base because they do not provide data about levels of poverty in the community. Such information is crucial before one can consider any proposals about housing.

Thirdly, and related to this is the fact that in the current proposed revision of the Neighbourhood Plan there is no longer a provision for affordable housing which as previous documents are concerned is essential to maintaining Lavenham as a functioning and homogeneous community and one that takes into consideration all social groups.

Concretely, by reducing the proposed number of dwellings in any proposal for new building from 24 to 12 it means that no new development will be obliged provide for affordable housing. This is against all previous commitments. (Please see the comments of the Lavenham Community Land Trust responsible for building affordable and energy efficient homes for residents of Lavenham)

At the same time the implicit acceptance of the building of up market housing in areas that normally would not be developed means that individual houses for the rich are firmly on the agenda.

Combining these two actions (or lack of action) it means that the children of poor families, most of these long-term residents if not born in the village, means there will be no houses for them in the future. In other words, the revised Neighbourhood Plan needs to be revised if it is not simply a recipe for the continued gentrification of the village. It must have statistical backup to its statements, analysis and conclusion.

In short in statistical terms the revised Neighbourhood Plan as currently proposed is neither valid nor reliable whilst compliant with official rules and regulations is against the intent and spirit of what a Neighbourhood Plan should be: a document in compliance with community needs and possibilities, that protects and enhances the community and is an important element in guaranteeing its sustainability.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ...

It needs a firmer empirical base to be able to make sustainable observations. It needs to be evidence based. It needs to deal with a fundamental contradiction between the need to secure and enhance the future of the existing community and the net result of its housing proposals that undermine the community.

It is too ambitious in the sense it was supposed to be a revision of a document that was clear about those elements.

It needs to deal with the fact the response rate to its questions is 12% and not the 60+% of the original plan.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

The points I raise above are crucial and these must be considered by the entire community.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	yes
The final 'making' (adoption) of LNP2 by Babergh District Council	Yes

Signed: Dr. C. M. Posner

Dated:07.08.2023

(20) Resident – Mrs Reeve

By e-mail

Rec'd: 15 August 2023

Subject: Lavenham NP revision

Dear ...

Lavenham draft revision to its Neighbourhood Plan, under Regulation 16

I do not believe that the draft submitted NP2 meets the needs of the man and women in the Lavenham street. The second condition set out in the *Vision* to the Basic Conditions Statement is flawed. All 64 pages of this justification (produced by an outside consultant) ignore the underlying argument of sustainability, that is a flourishing local community and therefore, homes for local people. Where in the plan is there mention of where and how these homes would be provided. Standards may be set, but for what? The development limitation of 12 proposed in effect rules out any meaningful contribution to local housing to meet the need for our young and old alike.

I also feel that the views of a minority over the majority have held sway. Not enough has been done to properly research the views of the village. It would appear that a low return rate of around 12 per cent on the resident questionnaire was accepted and not questioned. The revision NP document itself is peppered with references to residents having expressed their views on this and the other, that is less than 10 per cent (80% of 12%) of residents.

Most of the so-called evidence such as the report from local estate agents demonstrates little. The village does have an up to date independently produced housing needs survey and this has been ignored. The justification paper produced by the chairman of the NP revision group for the 12 number limitation (MAXIMUM SIZE OF RESIDENTIAL SCHEMES Note to Parish Councillors) is skewed and says it represents the views of residents but does not say how many residents and is clearly biased as is the supportive data.

All in all, the revision document is based on a very thin evidence base and then does not meet the sustainability requirements of the village as a whole.

Mrs Reeve

15th August 2023

[Ends]

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(21) Resident – Mr Reeve

By e-mail

Rec'd: 15 August 2023

Subject: Lavenham Reg 16

Please find [below] my comments on the Lavenham NP revision, known as NP2.

I was involved in the research and subsequent writing of the Lavenham Neighbourhood Plan that was made in 2016. As chairman of the parish council during 2020, I also helped set-up the revision process that culminated in the draft document known as NP2. I am also a founding trustee and current chairperson of the Lavenham Community Land Trust.

When being tutored to produce the 2016 Plan, it was instilled in the team that as a first stage it was paramount to establish a factual analytical base for any Neighbourhood Plan. In addition, we were advised to engage with our community in order to drill down to establish underlying values, views, concerns and perspectives. Moreover, any process must be transparent.

The draft NP2 fails these basic tests.

A single questionnaire was put on line (with the option of asking for a paper version) this had a low return rate of some 12 per cent of the population with in essence only one public meeting, held over two sessions, but with the same agenda. No further efforts were made to engage with residents. This contrasts with the experience of the original NP questionnaire with a response rate of 68 per cent supported with a raft of meetings and collaborative workshops with residents.

In addition, the superficial analytical base for the Regulation 14 document was drawn from out-of-date data, that is the 2011 national census. Thus, the draft NP2 that went out for consultation under Reg 14, included 2011 data and without any reference to other valid sources such as a current village Housing Needs Survey. At the time of the commencement of the Reg 14 consultation period the timetable for the release of the 2021 Census was known and imminent, as was the release of the 2022 Housing Needs Survey (HNS).

Both the parish council and the NP2 group decided not to pursue an up-to-date HNS. This was instead sponsored by Lavenham Community Land Trust (LCLT) and carried out independently by Community Action Suffolk. The production timetable was advised to both the parish council and the NP2 group chair persons and subsequently released to them on 2nd November 2022 – the date of the subsequent release to their members is unknown. Its findings were subsequently ignored. The Reg 16 draft includes references to the 2021 national census, but the underlying findings of the earlier draft remain.

Papers that now form part of the supporting package to the Reg 16 draft were only recently released, some simultaneously with the Reg 16 draft, via the parish council website. However, with a large older demographic, this population requires a more sympathetic attitude to communication and engagement. Web based information is inadequate for this cadre of people. By contrast during 2020 the parish council communicated Covid-19 information to our residents by hand delivering 6 newsletters.

The prime aim of the current NP and the NP2 revision is the sustainability of the village of Lavenham. To achieve this requires a degree of planning to retain younger people in the village and safe havens for older residents. The 2016 NP process identified the need for homes for local people with the young and old at its heart. The outcome of this was the delivery of 18 homes at Peek Close, a former SCC Highways depot, for people with a local connection. The conduit for this was the LCLT, in partnership with others and notably Hastoe Housing. The NP2 limitation of 12 dwellings placed on any development in the village would obviously preclude a similar development and moreover, this limit of 12 is not based on any objective analysis. As is known the NPPF states that strategic policies should, as a minimum, provide for objectively assessed needs for housing. The 2022 HNS identifies a need for 99 dwellings – see <http://lavenhamclt.onesuffolk.net/home/housing-needs/>

In addition, the 12 limitation number is too close to the number 10 and there is thus a temptation for developers to scale down any development to 10 units and thus avoid any social housing obligation with a concomitant enhancement to their profits.

The NP2 revision document provides a paper in support of the 12 limit at <https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Lavenham-NP2-Res-Schemes-Size-Note.pdf>

This justification paper has a number of major faults.

The second paragraph states '*many residents have expressed the view that ...*'

However, how many. The paper does mention five out of six respondents (or 84 %), but with a return rate of only 12 % based on 2021 data that equates to roughly 10 % of the local population and then split between agreed or strongly agreed with the question posed. Percentages are referred to elsewhere in this document and elsewhere in the NP2, and these could be misleading without any reference to absolute numbers. Thus the 33% of the those attending the 17th January event (held during the Reg 14 consultation) is in the range of 15 to 20 people! And not I would argue a representative sample. Likewise, the quoted comments are all negative. Of the four completed developments mentioned three are greater than 12 in number (Weavers Close, Mortlocks, and Deacons Close and were built more than 15 years ago) and only White Gates has any affordable element with one small unit (of either 1 or 2 beds). The Southwold scheme is in fact an Exception Site. The 6 units that are currently subject to a planning decision are all 4/5 bed houses, without any affordable element. None of this addresses the needs of local people.

A further example is the housing price data supplied by Consultant Hannah Lazarus which draws similar conclusions as to that included in the current Neighbourhood Plan, that Lavenham house prices are above Babergh District, County and National averages. For instance, an entry level property would require an annual household income of £51,000. The National Living Wage is some £20,400 and the lower quartile full-time salary paid in Babergh district in 2022 was £23,800. Lavenham's economy is based around hospitality and similar low paid jobs. It follows, as Ms Lazarus remarks that 'it seems reasonable to conclude that many young people and low-income households with a connection to Lavenham and looking to get onto the housing ladder would need significant support to set-up home in their community.'. It follows that rental levels are also high.

Basically, the little evidence that is put forward is counterintuitive to the findings of the NP2. The selective nature of the reporting of opinions and the relatively small samples provided for NP2

should be objectively addressed. The NP2 should not progress without a proper factual appraisal and greater engagement with the people of Lavenham. As NP2 stands it does not meet the second condition set out in the *Vision* to the Basic Conditions Statement

A flourishing community, sustainable and resilient. Here it is stated LNP2 'aims to ensure the needs of residents, workers and visitors will continue to be met, and quality of life for all age groups will be enhanced'. And in the table that follows the four visions, no mention is made of '*people*'.

Carroll Reeve
10th August 2023

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(22) Resident – Mrs D Twitchett BEM & Mr Twitchett

By e-mail

Rec'd: 15 August 2023

Subject: Lavenham Neighbourhood Plan 2

Comment on Lavenham Neighbourhood Plan 2 Revision

Both myself and husband have lived in Lavenham all our lives, we have raised our children with our family around us for the past 72 years.

I myself have worked over the years with many groups in Lavenham, I served for 20 years on the Parish Council, the Lavenham Community Land Trust since it's formation and also helping to create the Good Neighbour Scheme and Dementia Alliance.

The draft Neighbourhood Plan 2 had a very low return rate of 12% of our population, with only two short public sessions, this was not a reliable way to be sure all residents could attend, we needed more consultation events.

With Neighbourhood Plan 1 we had a lot of meetings to discuss local matters and a village support of 68%.

The Neighbourhood Plan 2 team used only information from the 2011 census even though the 2021 census was to be imminently available, also without any reference to the Community Land Trusts current Local Needs Housing Survey. This is unsatisfactory.

The aims we hope of a Neighbourhood Plan is the sustainability of our village of Lavenham, keeping our younger people here and keeping our older residents safe and comfortable in their advancing years.

In the Neighbourhood Plan1 the needs of young and old as far as housing was identified, was a need for affordable homes for local people, new builds of 24 properties with 33% affordable gave us 8. The Community Land Trust in partnership with Hastoe Housing and others were able to complete 18 affordable homes at Peek Close, all those going to people with a local connection.

The Neighbourhood Plan 2 now wants to limit a site build to 12 instead of 24 this would lower the amount of affordable homes and if any builders were decide to only build 10 for viability, then there would be no affordable at all, we are on a downward and backward slope.

The local 2022 Housing Needs Survey identified a need for 99 dwellings. We feel the Neighbourhood Plan 2 revision does not cover these needs based on the 12% population reply and feel many of the results are misleading.

We are like many other villages throughout the country where house prices are forcing youngsters to move from where they grew up, this is where local needs and affordability can play a big part. We feel there is a greater need here in Lavenham for more affordable homes and are disappointed to see that the Neighbourhood Plan 2 is not looking to create this.

They seem to have only a small amount of local opinion provided for the Plan and it should not go forward without more local engagement and a higher level of involvement of those who live in Lavenham.

[Ends]

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(23) LATE REP from HISTORIC ENGLAND



Historic England

By e-mail to:
communityplanning@baberghmidsuffolk.gov.uk

Our ref: PL00791856
Your ref:
Date: 18/08/2023

Direct Dial:
Mobile:



Dear Mr Bryant,

Ref: Lavenham Regulation 16 Neighbourhood Plan Consultation

Thank you for inviting Historic England to comment on the above consultation. We welcome the production of this neighbourhood plan in principle but, owing to staff vacancies, we do not currently have capacity to provide detailed comments.

We would refer you to any detailed comments we may have made at earlier stages of the plan's production including Regulation 14 and where it was required, SEA screening/scoping and draft report stages.

Our detailed advice on successfully incorporating historic environment considerations into neighbourhood plan, alongside some useful case studies, can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any specific queries arising following this stage, and we will endeavour to assist at that time.

Yours sincerely,

Will Fletcher

Development Advice Team Leader
Email: will.fletcher@historicengland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



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