

Long Melford Neighbourhood Plan, Regulation 16 Consultation

Response by Long Melford Parish Council to Comments Made

Response to Suffolk County Council representation

Archaeology and Education

SCC's comments on archaeology and education are noted.

Flooding

In relation to flooding and Policy LM6 it is agreed that the following should be inserted in para 4.72 of the Draft NP: "Flood risk from fluvial and pluvial sources within the site is low, however there have been reported surface water flood incidents within the vicinity of the site."

Also in relation to flooding the Parish Council agrees with the proposed amendments to Policy LM12:

"POLICY LM 12: ADDRESSING FLOOD RISK

On any site where there is a risk of fluvial or surface flooding and where development is proposed, the application for planning permission must be accompanied by a flood risk assessment and by details of the measures that will be taken to mitigate the risk of flooding on the application site and avoid increasing flood risk elsewhere as a result of the proposed development. Sites with a risk of flooding should include Sustainable Drainage Systems. On larger sites (10 or more dwellings, or more than 0.5 hectare), the proposals should incorporate sustainable urban drainage. Minor development will be expected to address drainage and flood risk to avoid cumulative impacts on flooding and drainage networks.

Proposals should comply, as appropriate, with SCC's Local Flood Risk Management Strategy."

Public Rights of Way

Comments noted.

Transport

SCC make a number of comments in relation to (Site Allocation) Policy LM5, Borley Road:

- Roper's Lane is a private, partially made lane.
- Pedestrian access is uncertain as ownership is potentially unclear.
- The current route is poorly surfaced.
- It is not clear to the Highway Authority how suitable pedestrian access to the site can be provided.
- Unless suitable pedestrian access can be provided, SCC recommend that the site be removed from the NP.

In response the Parish Council emphasise that the allocation of this site does not depend on vehicular access to Roper's Lane, only pedestrian access.

Inspection of the lane and the evidence of local residents indicates that there has not been, within living memory, any attempt to restrict access to the lane for either vehicles or pedestrians. This makes it likely that Roper's Lane has become a right of way by presumed dedication. A House of Commons Library Research Briefing from 2011 describes the process and its legal foundation:

"The most common way that rights of way come into existence is by presumed dedication. There is a long established principle that long use by the public without challenge can constitute evidence that the landowner intended to dedicate the used route as a public right of way. Presumed dedication can take place by common law or statute law. Statute law requires a period of use of 20 years from the point the use of the path is brought into question. Common law dedication may require less time."

A recent enquiry by a local resident to Suffolk County Council elicited the following account of the status of Roper's Lane:

- The Lane is a byway.
- Maintenance is not a public responsibility.
- The Lane does not have to be a particular width, as long as it allows access for emergency vehicles including access to the sewage pumping station immediately north of the Borley Road site.

Byways are described in the website Law and your Environment, The Plain Guide to Environmental Law as either:

"Byways Open to All Traffic (BOAT) - These byways are normally marked "byways" and are open to motorists, bicyclists, horseriders, motorcyclists and pedestrians. As with public tarmac road networks, motorists must ensure that they are legally authorised to use BOATs (i.e. registered, taxed, insured and MoT'd)," or

"Restricted Byways - Restricted Byways are created under the Natural Environment and Rural Communities Act 2006. They are open to the traffic mentioned above in BOATs, but exclude motor vehicles and motorcycles."

Whatever the ownership of the Lane, it is clear that a general or public right of passage along the Lane has been established, certainly for pedestrians and almost certainly for vehicles.

As to the condition of the Lane, it was inspected at the time of the preparation of the NP and again in responding to the present representations, and it is clearly in a very usable condition: very few potholes and very little unevenness. Two photos show the good condition of the Lane:

1. The northern section which is a designated public footpath and which leads to Station Road.
2. The southern section leading to Borley Road.



The Parish Council conclude from the evidence that suitable pedestrian access to Station Road can be provided via Roper's Lane and that the allocation of the Borley Road site is valid.

Infrastructure Provision

SCC quote Policy LM15 as saying: “The policy states that the Parish Council will seek section 106 contributions to address impacts of development in Long Melford.” Whereas the Policy actually says: “The Council will seek to ensure that any impacts of proposed development are mitigated by appropriate s.106, s.278 or other suitable obligations.” The Draft NP wording is different from that quoted by SCC and it is expressly designed to acknowledge that the Parish Council is not the relevant authority for either s.106 or s.278 obligations. The Policy supports the Parish Council in urging decision-takers to take account of impacts within the Parish, impacts which may be relevant to the grant or refusal of planning permission, and which may lead to mitigation which might otherwise not have occurred.

The Parish Council suggest one amendment to the Policy to make the two paragraphs consistent and clear in the sense set out above: in line 3 of para 2 of the Policy insert “to ensure that” after the word “seek”.

By way of clarification the Parish Council suggest inserting a new sentence at the beginning of para 4.95: “The Parish Council recognise that the relevant authorities for s.106 and s.278 obligations are, respectively, Babergh District Council as planning authority and Suffolk County Council as highway authority.”

Given the above and the proposed amendment and addition, the Parish Council believes its position on infrastructure provision is clear and that this Policy meets the basic conditions.

Response to Babergh District Council representation

Policy LM5: Land in Borley Road

The Parish Council accept the amendment proposed to paragraph 2 of the Policy and also the proposed deletion of para 4.60; the policy amendment reads:

“Subject to viability appraisal demonstrating that affordable housing cannot be delivered alongside employment and regeneration objectives, the site will not be expected to provide affordable housing in accordance with Policy LM 9, Affordable Housing or to provide housing for local people in accordance with Policy LM 10, Housing Reserved for Local People, or less expensive market housing in accordance with Policy LM 11, Provision of Less Expensive Market Housing.”

LM6: Land West of the High Street

The District Council has proposed an amendment to para 3 of the Policy, which would read, as amended: “affordable housing should be reserved for local people, local people being in housing need and local as defined in the Hamilton Trust”.

The Parish Council sees no need for the additional words “in housing need” as the Hamilton Trust’s definition of local people covers the issue of need: “The Hamilton Charity having its objective the benefit of poor persons or persons in reduced circumstances who shall have been resident in Long Melford for not less than three years.”

LM10: Housing Reserved for Local People

The District Council is concerned that reserving affordable housing for local people restricts the ability of the District Council to provide people in housing need with affordable housing in other locations within Babergh than their current place of residence. In other words for the District Council 'local' means Babergh District not the Long Melford area.

The Parish Council believes that Policy LM10 strikes a fair and legitimate balance between meeting District-wide and local housing need. Firstly there is no strategic policy in the Draft JLP which requires all affordable housing to be made available to meet District-wide need; Policy SP02 refers only to the mix and type of housing.

Draft JLP, Policy SP02, Affordable Housing, Proposals for new affordable housing will be expected to have regard to the mix and type of housing needs identified in the most relevant district needs assessment evidence supported by the Council.

Secondly Policy LM10 provides for only half the affordable housing to be reserved for local people; the balance will be available to meet District-wide housing need.

LM11: Provision of Less Expensive Market Housing

The District Council see this policy as difficult to implement and suggest a prescriptive approach based on local evidence.

The Parish Council has been clear about what constitutes 'Less Expensive Market Housing': small and terraced houses and flats; the justification for the Policy makes it clear that price is also important in the definition. In the absence of housing evidence which gives a sure basis for a particular mix of house sizes, the Parish Council have put the onus on the developer/applicant to justify the housing mix. Developers generally rely on market research and the Parish Council, with a critical judgement, will evaluate the evidence put forward by the developer.

Response to Ms Hoppit representation

Policy LM5

Access to Roper's Lane

In response to Ms Hoppit's points:

- a. Policy LM5 does not provide for vehicular access to Roper's Lane; neither do the proposals rely on Roper's Lane for vehicular access to the development site.
- b. Roper's Lane is indeed private and it is not a public highway maintained by Suffolk County Council.
- c. As the Parish Council have set out in their response to Suffolk CC, public rights of access to Roper's Lane have been established.

Inspection of the lane and the evidence of local residents indicates that there has not been, within living memory, any attempt to restrict access to the lane for either vehicles or pedestrians. This makes it likely that Roper's Lane has become a right of way by presumed dedication. A House of Commons Library Research Briefing from 2011 describes the process and its legal foundation:

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Whatever the ownership of the Lane, it is clear that a general or public right of passage along the Lane has been established, certainly for pedestrians and almost certainly for vehicles.

Easement for Septic Tank

If there is an easement relating to the septic tank and its linked drainage field and affecting land within site D1, it will be known to the owner of the site and any development proposals will need to respect the rights set out in the easement. Those rights will include such issues as the restriction on building within 15m of the drainage field. This all requires confirmation by reference to the legal easement itself.

It is not expected that the development proposed in Policy LM5 will be affected by the easement.

At the limit, if there was found to be a conflict between the easement rights and the proposed development, it would be open to the developer to offer to provide Ms Hoppit’s house with a connection to the main sewer, which runs in Roper’s Lane.

Residents’ Amenities

In relation to the amenities of local residents, the Parish Council would be prepared to insert a phrase in the first sentence of the last paragraph of the Policy: “high standard of amenity in any

proposed development, particularly with respect to the relationship with adjacent residential properties and as to the relationship between

In relation to Ms Hoppit's point about 'frontage to Roper's Lane' the Parish Council confirm that Policy LM5 does not provide for, or rely on, vehicular access to Roper's Lane. Whether the Lane is repaired or maintained depends on the owners. It is in their interests to maintain the Lane. The owners of Site D1 own the southernmost portion of the Lane and they have undertaken repairs from time to time. The photographs presented in the Parish Council's response to SCC's comments indicate that the Lane is in good condition.

The Parish Council believe that the quiet, rural nature of the Lane will be maintained in the future, as only pedestrian access will be provided from the proposed development.

Summary Response

In relation to Ms Hoppit's suggested improvements, the Parish Council comments:

- a. Vehicles from the proposed development will not be provided with access to Roper's Lane. There would be real practical difficulties in limiting pedestrian numbers and the Parish Council believes it would be unnecessary to impose such limits.
- b. Any legal rights protected by an easement will be respected.
- c. The Parish Council has proposed an amendment to Policy LM5 to ensure residential amenity is safeguarded.
- d. The owners of Site D1 have reserved an area on their section of the Lane for passing and turning; this could be maintained in any development proposals.

Response to Gladman representation

Numbers refer to paragraphs in Gladman's representation.

3.1.2 Development Plan

In the Parish Council's Statement of Basic Conditions the LMNP has been tested against both the Babergh DC Core Strategy and the Joint Local Plan. Significantly the housing requirement that has been provided to the Parish Council emerged through the JLP. Process, which is up to date where the Core Strategy is out of date.

3.2.1-3.2.3, 4.2.1 and 4.2.2 SHELAA

The SHELAA is relevant to the Parish Council's site assessment only to the extent that four sites considered in the SHELAA were evaluated in the LMNP site assessment. The Parish Council does not foresee a need to review the LMNP in the light of any changes to the SHELAA.

4.3.1 Settlement Boundary

It may be considered unnecessary, but it does not bring the LMNP into conflict with any of the Basic Conditions, to allocate sites inside the settlement boundary. The allocation of sites allows the Parish Council to design policies specific to the location and characteristics of the sites. It also

enables the Council to demonstrate the number of homes that will be sustainably facilitated by the LMNP.

4.3.2 Limiting Sustainable Expansion

The Plan does not limit the sustainable expansion of Long Melford. The additional 77 dwellings provides flexibility over and above the requirement provided by Babergh DC. If further change arises then the LMNP can be reviewed, the need for which may arise if the Local Plan has been reviewed. The requirement on neighbourhood plans in NPPF is set out at para 29:

“Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”

NPPF goes on to say (para 66):

“Strategic policy-making authorities should establish a housing requirement figure for their whole area... Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.”

The LMNP provides land for 444 dwellings, 77 or 21% more than the requirement provided by Babergh DC, a significant margin over the requirement and compliant with Government Policy.

4.4 Location of Future Development

Five sites in the south west of the Parish were assessed in the site assessment (Appendix 3). Three have been allocated for development (Sites S1, F1 and D1); two (F2 and M1) have not been allocated. Any further requirement for sustainable development in the future will be considered in a review of the LMNP; the south west of the Parish will be considered along with other areas of the Parish. LMNP does not impose any limit on development coming forward in the south west of the Parish.

Response to Turley representation

LM10, Housing Reserved for Local People

Turley state: “Such a requirement would normally be subject to eligibility criteria that the District Council’s Housing Team would be involved in as part of a planning application and associated Section 106 Agreement”. Turley do not elaborate on this point in planning policy terms. The objection seems to be limited to the observation that the LMNP provision is not normal. This is not evidence that Policy LM10 is in conflict with strategic policies of the local plan or with Government policy or therefore non-compliant with Basic Conditions. The Parish Council’s response to Babergh DC objections on practical not planning grounds is provided under the relevant Babergh DC heading above.

LM11; Provision of Less Expensive Market Housing

Turley propose that this policy should be amended in order to bring the wording into closer alignment with the emerging Joint Local Plan policies on this matter and ensure that the policy meets the required basic conditions. Turley do not however explain to which Local Plan Policies they refer to or how LM11 Conflicts with the Basic Conditions. The Parish Council cannot respond to Turley's assertions without this information and they are therefore confident that the Policy does not involve a conflict with the Basic Conditions.

LM14, Protection of Rural Gap

Not Compliant with NPPF; not Meeting Basic Conditions

LM14 does not designate a Local Green Space; therefore the test of "not an extensive tract of land" in NPPF para 102 does not apply. Turley's point about the scale of the designated area (89% of the land on the Sudbury side of the A134) is not relevant. A number of factors point to the non-strategic or local nature of the Rural Gap:

- The proposed Rural Gap (Turley's measurement of 368 acres) is only 6.8% of the area of Long Melford Parish (5420.8 acres); it is specific and local in a Parish context and insignificant in a District context.
- Turley make the point that the District Council have not proposed a policy in the JLP to prevent the coalescence of settlements, implying that the Parish Council have presumed to promote a strategic policy. However in the light of the role that Neighbourhood Plans are expected to play (NPPF para 29), the Parish Council see the proposed Rural Gap as quite properly addressing local and specific circumstances which the District Council have not seen the need to address elsewhere in the District.
- The Parish Council do not see any conflict between the proposed Rural Gap and the countryside policies of the JLP: SP03, as originally drafted referred to "isolated locations" which would not describe the proposed Rural Gap; the draft amendment states: "development will only be permitted in circumstances specified in national policy." The main reference in NPPF to development in the countryside is in para 80, but it only refers to a restriction on isolated homes. Policy LM14 is designed to address a wider range of development which might compromise the gap between Long Melford and Sudbury.
- The policy has no implications for development elsewhere in the District.
- The strategic policy set out in the Draft JLP to expand Sudbury on the north side of the Northern By-Pass is completely respected in the Rural Gap policy

Rural Gap: Supporting Evidence and Green Belt

Turley say the Rural Gap policy is not supported by adequate evidence, by which they mean landscape appraisals. This comment is wholly inappropriate, as the Rural Gap is not a landscape designation. Turley rightly remark that the Parish Council have used the concept of Green Belts as an analogy for the Rural Gap policy. Landscape quality is expressly not a criterion for the designation of Green Belts (NPPF para 138, the purposes of Green Belts). Para 137 defines the fundamental characteristics of Green Belts: "the essential characteristics of Green Belts are their openness and their permanence."

Para 139 of NPPF clearly envisages that non-Green Belt policies may be employed to achieve purposes that are analogous with those of Green Belts,

“Any proposals for new Green Belts should be set out in strategic policies, which should: a) demonstrate why normal planning and development management policies would not be adequate;” (para 139). NPPF draws a clear distinction between “normal planning and development management policies” and strategic policies. The Parish Council is confident that Policy LM14 is a normal planning and development management policy not a strategic policy.

The use of Green Belt provisions by analogy in other policies is expressly provided in NPPF para 103 in relation to Local Green Spaces.

Turley claim the support of Babergh DC in seeking the removal of the Rural Gap Policy; however the Council have not commented on the Policy in their response to LMNP Regulation 15 Draft.

In 2018, Babergh and Mid-Suffolk District Councils commissioned a ‘Heritage and Sensitivity Assessment’ from Place Services. Individual Sensitivity Assessments are included in the Appendix to that document linked here:

<https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Appendix-1-Babergh-settlement-assessments.pdf>

For Long Melford see pp 36-40, with the following on page 40 included within the ‘Recommendations’ (highlight added in regard to potential coalescence between Long Melford and Sudbury):

Recommendations: The landscape to the north of the settlement containing two country houses is of exceptional significance The development of Long Melford to the south and Sudbury to the north has the potential to create coalescence and it is recommended that this is strongly resisted.

Rural Gap: AECOM, Strategic Environmental Appraisal of LMNP

AECOM in their SEA of the LMNP concluded: “Policy LM 14 (Protection of Rural Gap) has positive implications for achieving the most effective use of land as it seeks to limit development in the existing gap between Long Melford and Sudbury. This could help embed a ‘brownfield first’ approach to the delivery of future development, though it is recognised that brownfield opportunities within Long Melford are likely to continue to be limited.

AECOM in their response to the consultation on the revised Rural Gap Policy concluded that “Policy LM14 is clearly spatial but ‘a spatial policy is not inherently strategic’. Feels key test of Policy is ‘general conformity with...strategic policies. in dev plan that covers area. E.g. JLP.’ And ‘Does not appear to be in conflict with JLP’. Policy does not apply to land within Sudbury Settlement Boundary and conforms with SP03 of JLP which says ‘outside the defined boundaries or in isolated locations, developments will only be permitted in exceptional circumstances.’ Says supporting text to Policy does reference landscape character in a general sense but protection it extends is not based on area’s landscape sensitivity per se.

Rather Policy is land use oriented seeking to prevent settlement coalescence and perceived erosion of settlement gap. Policy neither explicitly or implicitly seeks equivalence with Green Belt policy. Concludes principles behind objections to Policy are largely unaffected by proposal to alter area

covered by policy. Might be merit to extending area to abut LM Settlement boundary but this would not remedy other identified issues. This (objection by Turley) undermines planning value of objections and simply serves interests of the landowner.

Development on the Northern Edge of Sudbury

Turley propose (their options a and b) that the LMNP should include proposals that inform development on the northern edge of Sudbury. The LMNP already acknowledges the development proposals for the northern edge of Sudbury in the way that the relevant boundary of the Rural Gap is drawn. Furthermore it provides for further development in the future by acknowledging that exceptional circumstances (e.g. a further expansion of Sudbury justified by the consideration of alternatives and by the need for such development) may justify an exception to the Rural Gap policy. It is not the role of the LMNP to provide for the expansion of Sudbury beyond the present JLP proposals and Babergh DC have not asked the Parish Council to make any such provision. The LMNP does not conflict with any strategic policies for development on the northern edge of Sudbury.

Previous Versions of the Neighbourhood Plan and Comments

Turley ask for access to previous versions of the Neighbourhood Plan and comments made by others. To avoid confusion, the Regulation 14 draft of the Neighbourhood Plan is no longer published on the Long Melford Neighbourhood Plan website but it can be provided in response to a request. The comments and representations made at the Regulation 14 public consultation stage are available on the website within the tab 'Public Consultation Representations.'

Response to the Lanpro representation

Stafford Park

The Parish Council accept that this site should be considered in the site assessment (Appendix 3). This has now been carried out and the assessment is appended to this response. A published version of this spreadsheet is on the LMNP website and it can be similarly amended at the examination stage. The site scored poorly mainly because of its poor access to services and by sustainable transport.

The Parish Council also accept that the Development Plan should recognise the need to remediate the contaminated land lying within Babergh DC/LM Parish. However the Parish Council does not accept that the LMNP conflicts with NPPF or that it in other respects fails when tested against the Basic Conditions. Lanpro quote paras 183 and 184 of the NPPF ("Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner"), both of which put the onus on the developer to address contamination. Babergh DC's local plan likewise puts the onus on the developer: Core Strategy CS15 "Proposals for development must respect....." and JLP LP17 "All developments must....." The Parish Council concludes that the policy material quoted by Lanpro not only puts the responsibility for remediation clearly on the developer/owner but also demonstrates that the issue of remediation is covered by the Development Plan which includes both the Local Plan and the Neighbourhood Plan.

Policy LM8, Impact and Character of Developments

Lanpro assert that the limit on developments of 30 housing units is insufficiently supported by evidence and is contrary to NPPF. The Parish Council is satisfied that there is sufficient evidence in either LMNP or NPPF:

- Developments need to relate well to the existing pattern of development;
- Smaller schemes, which are capable of development by small and medium builders, are supported in paras 69 and 70 of NPPF.
- The context for this policy is that committed or built schemes covered by the LMNP and which are having or will have a significant effect on the character of the village include Orchard Brook (48 units), Weavers' Tye (71), Elms Croft (77) and Station Road (150).
- The historical and architectural quality and sensitivity of Long Melford and its sensitivity to additional development (LMNP para 4.78).
- NPPF para 78: "In rural areas, planning policies and decisions should be responsive to local circumstances" "

Lanpro say: "it (the policy limit of 30 units) will clearly place an arbitrary constraint on development proposals for which there is no policy basis or robust evidence. For example, there may be instances where windfall developments need to come forward outside of the Plan-making process." Lanpro say that they are contemplating a windfall development that would come forward outside the plan-making process. This suggests that a scheme would be outside the plan-making process in more than just respect to Policy LM8, it would be generally exceptional, but it would have to be judged on its merits. The Parish Council see no need to alter Policy LM8 for the sake of possible but unknown windfall proposals, but will consider any planning application on its merits; exceptions to policy can be entertained.

Babergh and Mid Suffolk Joint Local Plan

Lanpro say that the LMNP will be out of date as soon as the emerging JLP is adopted and should immediately be reviewed comprehensively. However Lanpro only present half the picture. Para 1.5 of the LMNP states clearly: they (the LMNP policies) conform with the strategic policies in BDC's Local Plan 2006 and its Core Strategy 2014. BDC are currently working on an updated Joint Local Plan.....The Neighbourhood Plan has been prepared in general conformity with the strategic policies in the Draft JLP. Furthermore, the Statement of Basic Conditions has tested the LMNP against the JLP as well as against the Core Strategy. Whilst minor amendments to LMNP may be justified in this consultation, none have been drawn to the attention of the Parish Council.

The Parish Council do not anticipate that there will be a need for a comprehensive review of the LMNP when the JLP is adopted.

Community Objectives

Lanpro ask for clarification of the weight to be attached to Community Objectives. The concept of Community Objectives is explained in para 1.8 of the Plan. In planning terms the Parish Council do not see the Community Objectives as carrying any weight. They provide context for the Plan and they represent activities that the Parish Council will undertake, sometimes in partnership with others, and which complement the provisions of the Plan.

Appendix 3, Call for Sites

The Call for Sites and their Assessment

Sites have been identified from several sources:

- BDC's SHELAA
- A public call for sites which was published in the parish magazine, which is delivered to 1650 households in the parish.
- An invitation to individual landowners to put forward sites for development.
- Third parties who were aware of sites that could be considered.
- NPT, who identified some sites.

In all cases landowners and third parties were made aware at this stage that all sites would be subject to detailed evaluation and that there was no commitment to any site being allocated for development.

33 sites were put forward and they were subject to three successive rounds of evaluation:

- A strategic assessment (Table 1 a-d below) against three criteria: greenfield vs brownfield; distance on foot to the centre of the village (the centre being taken as the Co-op or Budgens, whichever is the nearer) and heritage impact (based on the Heritage and Settlement Report, 2018, by Essex Place Services and commissioned by the joint councils).
- A detailed assessment (Table 2 a-d below) based on the Council's mapping of constraints (15 criteria) together with eight additional criteria specific to Long Melford and mainly related to the accessibility of village facilities.
- An assessment of the deliverability of sites, sometimes drawing on the advice of developers who had shown suitable experience and capability to work in Long Melford.

The Heritage and Settlement Report is particularly significant for Long Melford. The report assesses settlements with some heritage significance according to the value of their heritage features, to the susceptibility of those features to further development and to the combined effect of value and susceptibility. Long Melford is one of only two settlements in Babergh District to be scored "High" on all three counts, meaning that the heritage assets of the village are highly valuable, they are highly susceptible to detriment attributable to development and the combination of these factors makes Long Melford especially vulnerable. The report gives guidance on the location and significance of heritage assets and on areas of the village where assets are particularly at risk.

Results and Provisional Allocations

Scores were given to sites in the first and second rounds of evaluation, but they were not the only factors influencing whether a site was taken forward. Other issues were the balance of sites between different parts of the parish, the size of sites (given the NPPF policy to provide small sites suitable for smaller developers), the opportunity for affordable housing, the desirability of maintaining a Local Green Space between Sudbury and Long Melford and the potential for public benefits related to a site. Whilst most residents acknowledge the need for more housing, they are very aware of the scale of housing under construction and reluctant to see much more being developed. There has also been a strong and articulate reaction against the large (150 dwellings) development proposed on "Skylark Fields."

In order to assess the capacity of sites to accommodate additional housing, a standard density of 25 dwellings per hectare has been used, a figure derived from the BDC Core Strategy. Clearly in practice this will vary from site to site. It is considered to be a reasonable average for present purposes.

It is proposed that the plan will cover an eighteen-year period starting in 2019, matching the emerging Joint Local Plan.

It should be noted that four sites identified in the SHELAA relate more to Sudbury and the proposed Chilton extension than to Long Melford. These have been recorded, but, whilst they will inevitably make some contribution to meeting housing need in Long Melford, they have not so far been counted towards meeting that need.

The key findings of the assessment of sites are summarised here:

- The sites put forward include very few brownfield sites and very few sites within walking distance of the village centre; the latter has not been counted as a compelling constraint given the famous 'long' character of Long Melford. However we have looked for opportunities to provide additional amenities in the more distant parts of the village.
- Heritage constraints impose limits on development over large parts of the parish.
- Partly because of the shortage of brownfield sites, which often offer a ready-made access, access is a constraint on the development potential of many sites.
- This constraint together with heritage and other significant constraints mean that few sites are capable of being delivered within the first five years of the Plan.
- However in the context of the committed supply identified in the parish and of the desirability of meeting particular needs in the parish, the Neighbourhood Plan Steering Group (NPSG) have identified a number of sites to be allocated in the first five years:
 - Three brownfield sites in the centre of the village, which can be brought forward quite readily and which can provide housing for those needing to have easy access to village facilities; their capacity will flow from detailed designs; we have estimated that they can provide provisionally seven units.
 - An exception site at the north end of the village, which is owned by a charity and which could provide 100% affordable housing; this could accommodate 20-38 houses (possibly some being market housing if a larger scheme is brought forward). The developer will be encouraged to provide a public amenity for the northern end of the village, possibly a green linked to the adjacent public footpath.
 - An allocation for retail and/or leisure use on the site adjacent to Nethergate Brewery, which the Brewery is committed to buying; the brewery has already provided a focus for the southern end of the village and this could be enhanced on a modest scale provided it does not compete with the services of the village centre.

Table 1 shows the strategic assessment, the 33 sites being presented in Tables 1a - 1d.

Table 2 shows the detailed assessment, the 33 sites being presented in Tables 2a - 2d.

Strategic Assessment

Table 1a

Assessment Criteria/Sites	H1	H2	H3	H4	H5	H6	H7	H8	H9	F1	Stafford Park (part)
Brownfield 3/greenfield 1	1	1	1	1	1	1	1	3	3	1	3
Distance on foot to Coop/Budgens 1150m or less 3; more 1	1	1	1	1	1	3	3	1	3	1	1
Heritage Settlement Sensitivity Assessment: 1 = affected by report recommendations; 3 = not affected; 2 =	2	2	3	3	2	1	1	2	3	3	3
Totals: Top scores (7-9) yellow; score 6 b	4	4	5	5	4	5	5	6	9	5	7

Table 1b

Assessment Criteria/Sites	Q1	C1	D1	M1	A1	L1	N1	R1	J1	K1
Brownfield 3/greenfield 1	1	1	3	1	3	3	3	3	3	1
Distance on foot to Coop/Budgens 1150m or less 3; more 1	1	3	1	1	3	3	3	3	3	1
Heritage Settlement Sensitivity Assessment: 1 = affected by report recommendations; 3 = not affected; 2 =	2	2	3	3	3	3	3	3	3	2
Totals: Top scores (7-9) yellow; score 6 b	4	6	7	5	9	9	9	9	9	4

Impacts

For each impact occurring: 1 = direct; 2 = indirect/partial; 3 = none

Site extends beyond defensible boundary & offers no new defensible	2	1	3	3	3	3	1	3	3	2
Conservation Area	1	3	3	3	1	1	3	1	1	1
Special Landscape Area	1	3	1	1	3	3	1	3	3	1
Built Up Area Boundary	1	1	1	1	3	3	1	3	3	1
Ancient Woodland	3	3	3	3	3	3	3	3	3	3
County Wildlife Sites	3	2	3	3	3	3	3	3	3	3
Flood risk high, Zone 3	3	3	1	3	3	3	3	3	3	3
Local Nature Reserves	3	2	2	3	3	3	3	3	3	3
Protected Species*										
SSSI	3	3	3	3	3	3	3	3	3	3
Agric land quality: Grades 1 and 2 (out of	2	2	3	2	3	3	2	3	3	2
Historic Gardens	2	3	3	3	3	3	3	3	3	2
Listed Buildings	2	3	3	3	3	3	3	2	1	2
Sched Anc Monuments	3	3	3	3	3	3	3	3	3	3
Historic Environmental Record (not assessed)										
Open spaces, playing fields, greens, allot's (now NPPF)**	3	3	3	3	3	3	3	3	3	3
Transport capacity; no data available										
Neighbouring uses: compatible w res devt 3; incompatible 1	3	3	3	3	3	3	3	3	3	3
Utilities, pipeline, STW; to check with undertakings										
Total score	47	58	54	52	67	67	60	66	65	51
Rank	31	13	19=	23=	1=	1=	9	3=	5	26
	Q1	C1	D1	M1	A1	L1	N1	R1	J1	K1

Table 2c

Assessment Criteria/Sites	C2	P1	G1	W1	C3	SS0967	SS0811	SS0557	SS1028	H10
Brownfield 3/greenfield 1	3	3	3	1	1	1	1	1	1	1
Safe & satisfactory access:										
Cars: Yes 3; No 1	3	3	3	3	1	0	0	3	0	1
Pedestrians: Yes 3; No 1	3	3	1	3	3	0	0	3	0	3
Cycles: Yes 3; No -1	3	3	3	3	3	0	0	3	0	3
Distance on foot to bus stop										
580m or less 3; more 1	3	3	3	3	3	1	3	1	3	3
Distance on foot to LM primary school										
1150m or less 3; more 1	3	3	3	1	3	1	1	1	1	3
Distance on foot to surgery										
1150m or less 3; more 1	3	3	3	1	3	1	1	1	1	3
Distance on foot to Coop/Budgens										
1150m or less 3; more 1	3	3	3	1	3	1	1	1	1	3
Sufficient utilities capacity										
Yes 3; No 1										
Site affected by constraints: measured under impacts below										

Impacts

For each impact occurring: 1 = direct; 2 = indirect/partial; 3 = none

Site extends beyond defensible boundary & offers no new defensible	3	3	3	1	3	1	1	1	1	1
Conservation Area	2	1	1	2	3	3	3	3	3	3
Special Landscape Area	1	3	1	1	3	3	3	3	3	1
Built Up Area Boundary	1	3	3	1	1	3	3	3	3	1
Ancient Woodland	3	3	3	3	3	3	3	3	3	3
County Wildlife Sites	3	3	3	3	2	3	3	3	3	1
Flood risk high, Zone 3	3	3	3	3	3	3	3	3	3	2
Local Nature Reserves	3	3	3	3	2	3	3	3	3	3
Protected Species*										
SSSI	3	3	3	3	3	3	3	3	3	3
Agric land quality: Grades 1 and 2 (out of	3	3	3	2	3	3	2	3	3	3
Historic Gardens	3	3	3	3	3	3	3	3	3	3
Listed Buildings	2	2	2	2	3	3	2	3	3	3
Sched Anc Monuments	3	3	3	3	3	3	3	3	3	3
Historic Environmental Record (not assessed)										
Open spaces, playing fields, greens, allot's (now NPPF)**	3	3	3	3	3	3	3	3	3	3
Transport capacity; no data available										
Neighbouring uses: compatible w res devt 3; incompatible 1	3	3	3	3	3	3	3	3	3	3
Utilities, pipeline, STW; to check with undertakings										
Total score	63	66	62	52	61	48	49	56	50	56
Rank	6	3=	7	23=	8	30	29	15=	27=	15=
	C2	P1	G1	W1	C3	SS0967	SS0811	SS0557	SS1028	H10

Table 2d

Assessment Criteria/Sites	S1	F2	W2
Brownfield 3/greenfield 1	1	1	3
Safe & satisfactory access:			
Cars: Yes 3; No 1	1	1	3
Pedestrians: Yes 3; No 1	1	3	3
Cycles: Yes 3; No -1	1	3	3
Distance on foot to bus stop			
580m or less 3; more 1	3	3	3
Distance on foot to LM primary school			
1150m or less 3; more 1	1	1	1
Distance on foot to surgery			
1150m or less 3; more 1	1	1	1
Distance on foot to Coop/Budgens			
1150m or less 3; more 1	1	1	1
Sufficient utilities capacity			
Yes 3; No 1			
Site affected by constraints: measured under impacts below			

Impacts

For each impact occurring: 1 = direct; 2

= indirect/partial; 3 = none

Site extends beyond defensible

boundary & offers no new defensible	1	1	3
Conservation Area	3	3	2
Special Landscape Area	1	1	1
Built Up Area Boundary	1	1	1
Ancient Woodland	3	3	3
County Wildlife Sites	3	3	3
Flood risk high, Zone 3	3	3	3
Local Nature Reserves	2	3	3
Protected Species*			
SSSI	3	3	3
Agric land quality: Grades 1 and 2 (out of	3	3	3
Historic Gardens	3	3	2
Listed Buildings	3	3	2
Sched Anc Monuments	3	3	3
Historic Environmental Record (not assessed)			
Open spaces, playing fields, greens,	3	3	3
allot's (now NPPF)**			
Transport capacity; no data available			
Neighbouring uses: compatible w res	2	3	3
devt 3; incompatible 1			
Utilities, pipeline, STW; to check with			
undertakings			
Total score	47	53	56
Rank	31=	22	15=
	S1	F2	W2

The strategic evaluation identified ten sites which scored 7, 8 or 9 out of 9 possible points; all but one scored 9 points. However, in six of these cases the owner has not supported the site being brought forward. Three of the remaining four sites (A1, L1 and G1) scored 57 or more points against the detailed criteria (out of a potential total of 69 points). These sites are small brownfield sites well within the built-up area. The fourth site scored 54 points and is considered suitable for allocation. These sites add up to 25 dwellings.

In line with the approach of taking into account factors other than the evaluation by points, consideration has been given to a further site, which has a particular justification: K1 is owned by a charity which is working with a developer to have the site developed wholly for affordable housing. The site scores poorly on the strategic criteria (4 points), being greenfield and at some distance from the village facilities. Given that sites for affordable housing often have to be in cheaper, off-centre locations and given the purpose of the developer, it is considered a site to be supported for allocation, subject to conditions. The site is appropriate for designation as a Rural Exception Site. The potential capacity is about 30 dwellings, making a total of 55 dwellings with the four sites previously identified.

Three further sites come into play if the threshold on the strategic assessment is lowered to 6 points, but in two cases (H8 and C3) the owner has not supported the allocation of the site. The third site (C1) is a small part of the proposed Skylark Field development, where an appeal is pending, and the owner is unwilling to consider a scale and nature of development that might be acceptable in the Plan (see Policy H9). Finally in the quest for housing capacity within the parish the NPSG looked at sites that would maintain and reinforce the linear character of Long Melford. One site, F1 on the west side of Rodbridge Hill, has been considered suitable for allocation. This site, subject to detailed layout, could accommodate some 30 dwellings, which would make the total capacity of the sites to be allocated 85.

Response to the Suffolk Preservation Society representation

SPS make three suggestions for additional dimensions to the LMNP:

- A character assessment of the village of Long Melford.
- A landscape assessment of the Parish.
- Preparation of list of a Non-Designated Heritage Assets.

The Parish Council recognise the merits of each of these. They will be considered when the LMNP is reviewed.

Policy LM 8: Impact and Character of Developments

SPS suggest that the requirement for an impact assessment proposed in the third para of this Policy should be extended to all development proposals not only those of ten or more units. The Parish Council see merit in this suggestion especially as the smaller developments are more likely to be within the historic village. The Parish Council propose that the third paragraph of the Policy be amended by the deletion of the words “Major (more than ten residential units or more than 0.5 hectares)” and putting a capital letter on the next word ‘Development.’

Statutory and Government Policy Heritage Protection

SPS suggest that the LMNP be strengthened “to reflect the statutory duty on local planning authorities to pay special regard to the protection of heritage assets (both listed buildings and conservation areas) and their setting” and to the relevant NPPF policy provisions. The Parish Council see little merit in repeating quite lengthy statutory and policy provisions in the LMNP; developers are bound by those provisions in any event and the provisions should be read in their proper context. The Parish Council do not propose to make any changes under this heading.