

LAVENHAM PARISH COUNCIL:

Report to Council: 28th September 2023

SUBMISSION DRAFT REVISION OF THE LAVENHAM NEIGHBOURHOOD PLAN

Purpose of Report

To invite the Council to endorse the appointment of Janet Cheesley as Independent Examiner, and to approve the Responses to Reg 16 Consultation Representations proposed in **Attachment B** to this report.

Background

At its 27th April 2023 meeting, the Council approved 'Regulation 15' Submission of the above Plan (sometimes referred to as LNP2), and its accompanying submission documents, to the Local Planning Authority (Babergh District Council). The Council is the 'Qualifying Body' for Lavenham's neighbourhood plans.

Since then, Babergh District Council (BDC) has undertaken 'Regulation 16' Public Consultation on LNP2, starting on 3rd July and ending on 18th August 2023. BDC received representations from 23 organisations and residents, which it has collated into **Attachment A** to this report.

The next stage in the consideration of LNP2 is examination of it by an Independent Examiner. BDC has liaised with the Council about this appointment, following which it has selected Janet Cheesley for this role. Ms Cheesley was the independent examiner for our current Lavenham Neighbourhood Plan (LNP1), which was adopted in 2016.

In preparation for LNP2's examination, the Council has set up a Qualifying Body (QB) Group (open to all parish councillors and currently chaired by Councillor Ranzetta). Its roles are:

- a. To oversee the preparation of proposed responses to communications from the examiner; and
- b. If the Plan is approved to go to a local referendum, to oversee preparations for that referendum.

BDC, on behalf of the examiner, has invited the Council to respond to the representations from organisations and residents recorded in **Attachment A**. The QB Group has agreed that these representations should be divided into two groups: (1) those that have only very minor or no concerns about LNP2; and (2) those that have more than very minor concerns.

The organisations and residents whose representations are in Group (2) above are listed below, together with their reference numbers from **Attachment A**:

- (1) Suffolk County Council
- (2) Babergh District Council
- (10) The Lavenham Press Ltd
- (11) Lavenham Community Land Trust
- (12) Brooks Leney
- (13) to (22) Residents

Attachment B to this report lists in its left-hand column (summaries of) all the concerns raised. Many individual concerns were raised in several representations, and these are identified in the left-hand column. Each row in the right-hand column gives (in blue text) the proposed response, to be sent to the examiner, to an individual concern raised in one or several representations.

For reference, the matrix in **Attachment C** to this report shows the organisations and residents whose representations are in Group (2) above (the columns), and the (summarised) concerns raised in these representations (the rows). An 'X' inside the matrix shows that a particular representation raised a specific concern.

The Examination

Examination once started could take two to three months. It will be conducted in public, which means all communications will be published on a dedicated web page on the BDC website. And the examiner is likely to run it through written representations only – but, in the unlikely event that issues crop up which the examiner does not quite understand, hearings may be called.

The examiner is likely to ask a series of questions to BDC and the Parish Council at the start of the examination, and then a second lot towards the end. The purpose of these will be to help the examiner clear up queries, when working through all the documentation and the representations.

If minded to make a significant change, the examiner will normally run a scenario with the Parish Council as to how this can best be done.

Before the end of examination, there will be a FACT Check report. This is a draft report issued by the examiner inviting BDC and the Parish Council to correct FACTUAL errors only. This will be followed by the actual FINAL report.

The FINAL report will include a set of REQUIRED modifications, which the examiner considers will need to be made to ensure the LNP2 meets the basic conditions. The examiner is only allowed to require modifications if these are necessary to ensure a neighbourhood plan meets the basic conditions.

Following the close of the examination, the Parish Council and BDC are expected to work together to prepare a Neighbourhood Plan Referendum. This is for local voters to decide whether LNP2 should be adopted in place of the (current) 2016 Plan.

Although, if the Parish Council does not wish to accept the REQUIRED modifications, but BDC consider they are required for LNP2 to meet the basic conditions, then the Parish Council has the option of withdrawing LNP2, and not proceeding to a referendum.

Councillor Jane Ranzetta

QB Group Chair

Roy Mawford

LNP Revision Group Chair

22 September 2023

Attachment A: Lavenham NP2 R16 Reps (BDC report)

Attachment B: Responses to Reg 16 Consultation Representations

Attachment C: Matrix of Reg 16 Consultation Representations

Motion:

The Council endorses the appointment of Janet Cheesley as Independent Examiner, and approves the Responses to Reg 16 Consultation Representations as proposed in **Attachment B** to this report.

Proposer:

Seconder:

Babergh DC Note:

Attachment A (as presented to Lavenham Parish Council on 28 Sept. 2023) was a repeat copy of our LNP2 Reg 16 Representations document. To make this Reps Response document more manageable, we only reproduce the cover section here (the table listing all 23 respondents).

To view the representations document in its entirety, please use the link below:

<https://prod-babergh.baberghmidsuffolk.dp.placecube.com/documents/d/babergh/lavenham-np2-r16-reps>

Babergh District Council**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

REG 16 CONSULTATION REPRESENTATIONS

CONCERNS: <ul style="list-style-type: none"> • Organisation or Resident (Reference Number) 	LAVENHAM PARISH COUNCIL RESPONSE:
GENERAL CONCERNS ABOUT LNP2	
G1. Include a Policies Map: <ul style="list-style-type: none"> • Suffolk CC (1) 	<p>This is something Lavenham Parish Council (LPC) could produce in collaboration with Babergh District Council (BDC).</p>
G2. LNP2 too complex and inaccessible: <ul style="list-style-type: none"> • Resident (16) • Resident (18) 	<p>This was an understandable criticism, but the LNP2 documents reflect an eventual target audience of planners, developers, architects, etc. But the initial readership includes residents, local businesses, landowners, etc., some of whom find LNP2 indigestible.</p> <p>In response to this concern (and if the Plan is approved to go to a local Referendum) a brief 'plain English executive summary' should be produced ahead of the Referendum notice period, to promote a better understanding of LNP2. And LPC will commission such a document.</p>
G3. LNP2 policies based on insufficient community engagement: <ul style="list-style-type: none"> • Lavenham Community Land Trust (11) • Resident (13) • Resident (15) • Resident (16) • Resident (18) 	<p>We accept that our level of community engagement was less than that undertaken when LNP1 was being prepared in its early stages. But our Reg 15 Consultation Statement shows the extensive level of engagement we achieved, notwithstanding the constraints imposed by the Covid19 pandemic. And, in the more advanced plan preparation stage, the level of engagement achieved as part of LNP2 cannot be said to have been less than that achieved at the same stage on LNP1.</p> <p>The Consultation Statements supporting both neighbourhood plans demonstrate the above (see https://www.babergh.gov.uk/planning/neighbourhood-planning/neighbourhood-planning-in-babergh/lavenham-neighbourhood-plan/).</p> <p>For example, the Consultation Statement supporting LNP2 tells us (see Section 8, paragraph 14) that 42 residents and 12 statutory consultees prepared written responses to the Regulation 14 LNP2, whereas the Consultation Statement supporting LNP1 tells us (see paragraph 6.5) that 23 residents and seven statutory consultees prepared written responses to the Regulation 14 LNP1.</p>

<p>G4. LNP2 policies based on insufficient evidence:</p> <ul style="list-style-type: none"> • Lavenham Community Land Trust (11) • Resident (16) • Resident (18) • Resident (19) • Resident (20) • Resident (21) • Resident (22) 	<p>This concern is contradicted by the fact that LNP2 policies were formulated based on information obtained from various sources, including:</p> <ul style="list-style-type: none"> • Historic England, • Natural England, • Office of National Statistics, • Citizens Advice, • Suffolk County Council (several sources), • Suffolk Biodiversity Information Service, • Babergh District Council (several sources) • Lavenham Community Land Trust (Local Housing Survey).
<p>G5. Failure to include 2022 Local Housing Survey (LHS) evidence:</p> <ul style="list-style-type: none"> • Lavenham Community Land Trust (11) • Resident (21) • Resident (22) 	<p>Lavenham Community Land Trust (LCLT) made available to us the 2022 LHS report in early November 2022, four weeks before the date on which the Reg 14 draft LNP2 consultation documents were published, which was too late for the report’s findings to be incorporated in those documents. But the relevant LHS findings were incorporated into the LNP2 Reg 15 submission version. (Reg 15 Consultation Statement Appx 10, Schedule of Changes to Reg 14 LNP2, number 36, LNP2 reference: Paragraph 7.5.5)</p>
<p>G6. 2021 Census evidence not included:</p> <ul style="list-style-type: none"> • Lavenham Community Land Trust (11) • Resident (19) • Resident (21) • Resident (22) 	<p>The Reg 14 draft LNP2 consultation documents included parish-level 2011 Census information, which was the most up to date in autumn 2022. Parish-level 2021 Census information became available in early 2023 and was incorporated into the LNP2 Reg 15 submission version. (Reg 15 Consultation Statement Appx 10, Schedule of Changes to Reg 14 LNP2, number 6, LNP2 references: Paragraphs 4.3, 4.4, 4.5, 4.6)</p>
<p>G7. Unreliable evidence from 2021 LNP2 Questionnaire:</p> <ul style="list-style-type: none"> • Lavenham Community Land Trust (11) • Resident (15) • Resident (16) • Resident (19) • Resident (20) • Resident (21) • Resident (22) 	<p>The 2021 LNP2 Questionnaire return rate was not as high as we would have hoped, although this may well have been affected by the Covid19 pandemic. But the Questionnaire is still a reliable information source. We note that some neighbourhood plans have been developed from on-line surveys conducted on commercial platforms. For guidance, Smart Survey says: ‘typical survey response rates can lie anywhere between 5% and 30%’, and our rate fell well within that range. Perceptions of unreliability could simply reflect disagreement by some respondents with the majority views of those who returned questionnaires.</p> <p>A residents’ survey was also undertaken in 2013, 68% of respondents to which, considered that more housing was needed in Lavenham, although 82% of respondents would not support more than 100 new dwellings. And LNP1’s strong preference for a maximum of 24 dwellings in a housing development was accepted by its Examiner, and by the community at the parish-wide referendum. Between 2016 and 2021, 120 new dwellings were built in Lavenham (Source: LNP2 Pre-submission version, Appendix 2). So, it is perhaps unsurprising that attitudes towards further housing development were different in 2021 to those expressed in 2013. 120 dwellings are 20% more than most survey respondents in 2013 were prepared to support.</p>

SPECIFIC HOUSING CONCERNS	
<p>H1. Failure to address need for affordable housing:</p> <ul style="list-style-type: none"> • Lavenham Community Land Trust (11) • Resident (15) • Resident (19) • Resident (21) • Resident (22) 	<p>LCLT carried out a Local Housing Survey (LHS) in summer 2022. 248 Lavenham households participated, including 99 whose housing requirements were not being met. LCLT says in its representation that all 99 households need affordable housing. But recent further analysis of the (confidential) LHS Report identifies some households saying they were unable to move because open market homes were unavailable, and not because these homes were unaffordable.</p> <p>Indeed, the publicly available executive summary to the LHS report, available to view here http://lavenhamclt.onesuffolk.net/home/housing-needs/ refers to 99 households, representing 105 people, needing additional housing but not additional <i>affordable</i> housing. Instead it refers to the “majority of respondents” indicating that “they were prevented from moving due to a financial reason”.</p> <p>Our analysis indicates that 52 of these households needed affordable homes, while the other 47 wanted market housing. It also indicates that the combined waiting list (Gateway to Home Choice and other lists) at the time the survey was undertaken was between 27 and 38 people.</p> <p>We now request that the second paragraph of 7.5.5 is redrafted in full, to read as follows: The Lavenham Community Land Trust carried out a Local Housing Survey in June 2022. Survey forms went to each of the 950 households in Lavenham. 248 forms were returned from households comprising a total of 500 residents. The survey identified 99 households seeking alternative accommodation, of which 52 needed affordable homes and 47 wanted market homes.</p> <p>The Local Planning Authority (LPA) has told us that its indicative minimum additional housing requirement for the period 2018 to 2037 is 118 dwellings. To date, 113 dwellings are either already built or in the development pipeline (Source: LNP2 Submission version, Appendix 2).</p> <p>So, LNP2 is not being asked by the LPA to deliver a significant additional number of new dwellings. In this very different context to LNP1 in 2016, LNP2 puts forward the strong community preference for a maximum of 12 dwellings in any housing development.</p> <p>Two pieces of work were commissioned (referred to in LNP2 Submission Version, Chapter Seven, alongside the LHS) that complement and reinforce the LHS’s findings:</p> <ul style="list-style-type: none"> • An informal survey of local estate agents confirmed the unmet demand for market housing. • An economic analyst examined house prices, and the relationship between earnings and market housing costs, in Lavenham – her report showed the extent to which market housing was out of reach to those on local incomes.

The LNP2 Submission Version recognises the unmet demand for housing, and the specific need for affordable homes:

- LNP2 includes specific policies for Affordable Homes (LAV 15), First Homes (LAV 16), Rural Exception Sites (LAV 17), and Specific Housing for Older People (LAV18) – the supporting text to these policies recognising LCLT’s role in the provision of affordable homes.
- LNP2 also includes general policies on Spatial Strategy (LAV 13) and Housing Mix (LAV 14) – these policies take account of the LPA’s indicative minimum additional housing requirement and the views of residents.
- Policy LAV 13 has a specific role in facilitating the delivery of affordable housing schemes focused on meeting village needs in coming forward. The up-to-date Settlement Boundary that supports this policy establishes where the principle of development applies (within the settlement boundary) and where it does not.
- As well as providing clarity for applicants, the LAV 13 settlement boundary also increases the likelihood of affordable housing schemes coming forward (where they comply with Policy LAV 17) outside the boundary. Without an up-to-date settlement boundary in place, the status of land can fall into question, leading to edge of village locations becoming at risk from market-led mixed development, which fails to deliver affordable housing that meets Lavenham’s needs.

The 2021 Census shows that Social Rented (21%) is the second largest type of housing by tenure (up from 20% in the 2011 Census). This percentage is substantially higher than the figure for England, and even more substantially higher than that for Babergh District as a whole. LCLT has made a positive contribution to achieving this significant figure.

But, in a 21/03 email to the Chair of LPC’s LNP Revision Group, the LCLT Board’s Chair (Resident 21) confirmed that it wanted to continue with LNP1’s strong preference for a maximum of 24 dwellings in a housing development. (Resident 15 and Resident 22 are LCLT Board Directors.) The 21/03 LCLT email asserted that, if this number were to be reduced, then the delivery of affordable housing would fall to nothing – or, at best, the odd isolated unit.

This assertion (in the 21/03 LCLT email) was not supported with evidence, and it ignores the Hastoe Homes extensive portfolio of up to 12-unit schemes. Hastoe has developed in the recent past or is currently developing 16 schemes ranging from two to 12 dwellings, of which five are in Babergh District. It is also currently proposing such schemes, locally and elsewhere in England. (Hastoe worked with LCLT to develop the recent Peek Close affordable homes scheme in Lavenham.)

	<p>LPC feels the unmet demand for housing, and the specific need for affordable homes, has been properly and adequately recognised in the LNP2 Submission Version. (As a footnote, it is incorrect to say that developments of 10 DWELLINGS OR LESS do not require an affordable housing component. It is developments of LESS THAN 10 DWELLINGS that do not require this component.)</p>
<p>H2. Build affordable homes on Sudbury Rd or Melford Rd:</p> <ul style="list-style-type: none"> Resident (13) 	<p>A site allocation exercise has not been undertaken as part of formulating LNP2. This is because we are not being asked by the LPA to deliver a significant additional number of new dwellings (Policy LAV 13). But Policy LAV 17 supports the delivery of affordable homes on rural exception sites, to meet Lavenham’s needs. Developments inside the proposed settlement boundary could also be partly or wholly of affordable homes.</p>
<p>SPECIFIC POLICY CONCERNS</p>	
<p>LAV 13 – P1. Amend text of Clause 2a (exception sites location):</p> <ul style="list-style-type: none"> BDC (2) <p>P2. Amend text of Clause 4 (strong preference for 12 units):</p> <ul style="list-style-type: none"> BDC (2) Lavenham Community Land Trust (11) Brooks Leney (12) Resident (19) Resident (20) Resident (21) Resident (22) <p>P3. Revise Map 7 (map ignores emerging JLP proposals which include additional residential allocations):</p> <ul style="list-style-type: none"> Brooks Leney (12) 	<ul style="list-style-type: none"> ➤ We agree both that the effectiveness of Clause 2a could be modestly increased by allowing sites that are a very short distance away from the settlement boundary, and that LNP2 must be in general conformity with JLP Part 1 (see comments below about Map 7). But BDC’s proposed amendment is too loose (no mention of very short distance). So, our suggested amendment is – Rural exception sites on the edge of the settlement boundary that are adjacent to the settlement boundary and well-connected to key services, and that accord with Policy LAV 17 of this Plan. ➤ The Local Planning Authority (LPA) has told us that its indicative minimum additional housing requirement for the period 2018 to 2037 is 118 dwellings. To date, 113 dwellings are either already built or in the development pipeline (Source: LNP2 Submission version, Appendix 2). So, LNP2 is not being asked by the LPA to deliver a significant additional number of new dwellings. And LPC feels the unmet demand for housing, and the specific need for affordable homes, have been properly and adequately recognised in the LNP2 Submission Version – which includes the a strong community preference (this wording is carried forward from LNP1, and is NOT a cap) for developments of up to 12 dwellings. Please also see LNP2 paragraphs 7.1.2 & 7.1.3, and LNP2 supporting document ‘Maximum Size of Residential Schemes’. ➤ Map 7 does not ignore the proposals in the emerging Babergh & Mid Suffolk Joint Local Plan (JLP), which was submitted for examination in spring 2021. But, by the end of 2021, the examination had been paused. And, in response to issues raised by the JLP Examiners, the two Councils had decided to split their draft JLP into two parts – <ul style="list-style-type: none"> ○ JLP Part 1 has since been progressed and the Examiners’ Report on its examination was published very recently on 20 September 2023. JLP Part 1 does not include either updated settlement boundaries or site allocations. But it is supported by evidence that each of the District’s housing

<p>P4. Remove Clause 2e: <ul style="list-style-type: none"> Resident (13) </p> <p>P5. No development on the west side of Park Road: <ul style="list-style-type: none"> Resident (13) Resident (14) Resident (17) </p>	<p>requirements is met through its housing supply. Map 7 in LNP2 provides a more up to date Settlement Boundary than that referred to in JLP Part 1; on this point it is intended that LNP2 will supersede this aspect of JLP Part 1, subject to LNP2 succeeding at both examination and referendum.</p> <ul style="list-style-type: none"> JLP Part 2 is expected to include, inter alia, a settlement hierarchy, a spatial distribution for any housing allocations insofar as necessary to provide flexibility to ensure plan period housing requirements can be met, housing requirements figures for Neighbourhood Plan areas, settlement boundaries and open space designations. <p>➤ We cannot override Paragraph 80 of the National Planning Policy Framework (NPPF)</p> <p>➤ This concern has no basis. LNP2 is categorically NOT proposing developments on the west side of Park Road, and perceptions that such developments are being promoted are based on misinformation.</p>
<p>LAV 14 – P6. Amend text of Clause 1: <ul style="list-style-type: none"> BDC (2) </p> <p>P7. Support larger scale developments, to allow both local people to downsize and young people to acquire housing: <ul style="list-style-type: none"> Resident (12) </p>	<p>➤ We are happy to amend LAV 14 Clause 1 to read as follows: Residential schemes must contribute to meeting the existing and future needs of the village. A mix in the size and type of housing will be required taking into account: the existing population profile (see Chapter Four); the needs of young people looking for 2 and 3 bedroom properties, and the needs of an ageing population looking to downsize into homes suitable for lifetime occupation, and the latest evidence on housing needs.</p> <p>➤ LPC will not advocate for larger scale developments, when both they are not required to meet indicative minimum housing requirements, and they fly in the face of a strong community preference for developments to be of up to 12 dwellings.</p>
<p>LAV 16 – P8. Amend wording of Clause 1 (rented/shared owners): <ul style="list-style-type: none"> BDC (2) </p>	<p>We agree that changes to wording of the policy, proposed by BDC, should be made</p>

<p>LAV 17 – P9. Amend text of Clause 1 (strong preference for up to 12 units):</p> <ul style="list-style-type: none"> • BDC (2) • Lavenham Community Land Trust (11) • Brooks Leney (12) • Resident (15) • Resident (19) • Resident (20) • Resident (21) • Resident (22) <p>P10. Remove ‘strong’ from Clause 2:</p> <ul style="list-style-type: none"> • BDC (2) 	<p>➤ BDC asked us to reflect on how the 12-dwelling ‘cap’ relates to the assessed need for affordable homes. Please see our response above to Concern H1 above (failure to address need for affordable housing). LNP2’s proposed strong community preference is not a ‘cap’. (It is a reassessment in changed circumstances of LNP1 Policy H1, last paragraph.) So, it may be helpful if Clause 1 is reworded to clarify this point, as follows:</p> <p>Proposals for small scale (up to 12 units) affordable housing schemes on rural exception sites on the edge of the village that are adjacent to the settlement boundary and well connected to key services, where housing would not normally be permitted by other policies, will be supported provided that:</p> <ol style="list-style-type: none"> a. The proposal by virtue of its size, scale and type will not exceed the identified local need; b. The types of dwellings to be provided are consistent with the needs identified in local housing surveys undertaken for Lavenham parish; c. They are not significantly damaging to the Defined Views into and out of Lavenham and are not detrimental to the wider Parish landscape; d. The proposal is appropriate to the size/scale and character of the village – consistent with LAV 13, the community strongly prefers schemes of no more than 12 dwellings; e. The proposal is also acceptable in terms of detailed considerations such as site location and circumstances, design, layout, materials, landscaping, biodiversity, impacts on the countryside, amenity and access, flood risk, etc; f. The affordable housing is provided in perpetuity. <p>➤ We agree that the word ‘strong’ in Clause 2 of LAV 17 should be deleted.</p>
<p>LAV 18 – P11. Amend text of Clause 2 (strong preference for 12 units):</p> <ul style="list-style-type: none"> • BDC (2) <p>P12. Clarify text of Clause 2 (over 60 age restriction) and whether housing is also restricted to those with connection to Lavenham/neighbouring parishes:</p> <ul style="list-style-type: none"> • BDC (2) 	<p>➤ Please see our response above to Concern P2 above (LAV 13, Clause 4)</p> <p>➤ We accept BDC’s advice that our policy intentions were not clearly expressed. Our intentions were for this policy to apply to older people who are residents of Lavenham Core Village and its hinterland parishes. We suggest the following redraft to Clause 1:</p> <p>Policy LAV 18: Supported Housing for Older People Proposals for housing, with care (extra care housing, assisted living, sheltered living) which meet the needs of Lavenham residents or those of neighbouring parishes specifically suitable for older people who are residents of Lavenham Core Village or its hinterland parishes, will be supported where they are:</p> <ol style="list-style-type: none"> a. sensitively and environmentally designed, and in accordance with other policies in the Plan

	<p>b. designed to accommodate visitor, staff, and resident parking off-street c. located within the Settlement Boundary (see Map 7)</p> <p>The above change also clarifies the text of Clause 2, to which we are not suggesting changes. (But other references in LNP2 to the title of LAV 18 would need to be changed.)</p>
<p>LAV 19 – P13. Remove LGS 19 (Railway Walk, Public Right of Way):</p> <ul style="list-style-type: none"> • Suffolk CC (1) 	<p>The Railway Walk should be a Lavenham Local Green Space, and it should be given as much ‘green space’ protection as possible, particularly from inappropriate intrusion by motor vehicles/cycles.</p>
<p>LAV 27 – P14. Amalgamate village schools in modern buildings:</p> <ul style="list-style-type: none"> • Resident (13) 	<p>LAV 27 indicates support for Lavenham Primary School, subject to other policy constraints, and amalgamations based in Lavenham would be supported in principle, but removal of primary school education from Lavenham would be resisted.</p>
<p>LAV 28 & 29 – P15. Make marketing periods 12 months:</p> <ul style="list-style-type: none"> • BDC (2) 	<p>LAV 29 is directly derived from LNP1 Policy C9, which includes a 12-month marketing period that we wish to retain and extend to LAV 28 – justified by our special circumstances of having many historic buildings in Lavenham, the market for which tends to be ponderous.</p>
<p>LAV 31 – P16. Lav Press site singled out (no other single locations)</p> <ul style="list-style-type: none"> • The Lavenham Press Ltd (10) <p>P17. Policy not compliant with NPPF guidelines:</p> <ul style="list-style-type: none"> • The Lavenham Press Ltd (10) <p>P18. Policy was a late addition to earlier LNP2 drafts, which had been available for public scrutiny:</p> <ul style="list-style-type: none"> • The Lavenham Press Ltd (10) 	<ul style="list-style-type: none"> ➤ Land at 47 to 48 Water Street (the Lavenham Press premises) is a very important site within the village, and so merits special attention. But it is not the only such location – two others with specific policies are the school site (LAV 27) and Market Place (LAV 22). The Lavenham Press site has not been singled out. ➤ The NPPF guidelines with which this policy is alleged not to be compliant are not specified – so we are unable to comment. ➤ This statement is incorrect. LAV 31 was not drafted until October 2022, because we waited until then for the outcome (rejection) of a planning application to redevelop the site as a McCarthy Stone residential facility. The first public draft LNP2 (the Reg 14 consultation version) was published in late November 2022, and included this policy.

<p>P19. Unfair, disproportionate, no evidence of public support:</p> <ul style="list-style-type: none"> • The Lavenham Press Ltd (10) <p>P20. Policy should be removed completely from LNP2:</p> <ul style="list-style-type: none"> • The Lavenham Press Ltd (10) 	<p>Lavenham Press was one of the businesses that received on 3 September 2021 emailed invitations (to ‘Terence’, and to ‘Bill’, at the Lavenham Group’s email address) to participate in our (online) 2021 questionnaire exercise. Follow-up emails were sent on 17 September. We received no responses.</p> <p>But the owner did engage with our Reg 14 consultation, including attendance at our LNP2 community engagement event in January 2023. Discussions were subsequently held, which led to a partial redraft of LAV 31 being included in the Reg 15 LNP2 submission version.</p> <ul style="list-style-type: none"> ➤ Two planning applications have been made in recent years for this site’s change of use from employment to residential. LPC spent time and resources (together with around 50 Lavenham residents for the second application) opposing these applications (which were both rejected). LPC would prefer not to have to deploy scarce resources to do so again. We also note that no organisation or resident, other than the site’s owner, is opposing this policy or seeking its amendment. ➤ This policy sets out the types of redevelopments LPC would support and should be retained.
<p>LAV 33 –</p> <p>P.21 Include a Listed Buildings map:</p> <ul style="list-style-type: none"> • BDC (2) 	<p>We agree, and the Map offered to us by BDC would be suitable. Alternatively, it might be possible to identify listed buildings in Map 7, which shows the settlement boundary.</p>
<p>LAV 35 & 37 –</p> <p>P22. Extend ALLS to include west side of Park Road Village Gateway:</p> <ul style="list-style-type: none"> • Resident (13) • Resident (14) <p>P23. Extend ALLS also to include Bridge Street Road Gateway, and west side of Bears Lane Gateway:</p> <ul style="list-style-type: none"> • Resident (13) 	<p>The ALLS has been proposed because the 2006 Babergh Local Plan contained a Special Landscape Area (SLA) covering the Lavenham Brook (River Brett) valley from close to the northeast corner of Lavenham Parish down the east side of the village to near the southern-most Parish Boundary. The SLA did not include any part of Lavenham Parish west of Bury Road, High Street, Church Street or Sudbury Road.</p> <p>The emerging Babergh and Mid Suffolk District Councils’ Joint Local Plan did not include the SLA or a similar designation, and so our consultant Chartered Landscape Architect considered the best way to update the SLA designation that is referred to in Policy ENV1 of LNP1. Our consultant architect has used her professional expertise to propose an ALLS covering Lavenham Rural Character Areas LR1, LR7, LR6 and LR4. The reasons for her choice of character areas are set out in the Lavenham Landscape Character & Sensitivity Assessment 2023 (LCSA – a supporting document to the Reg 15 draft LNP2). The proposed ALLS includes landscapes to the east, north and west of the village, although its emphasis is towards the east and north.</p>

	<p>The Character Area boundaries were created for LNP1 and were subject to further scrutiny before they were retained for LNP2. Changing the ALLS boundaries would require some of the character areas to be redefined. Our consultant architect cannot find good landscape reasons for doing so, to accommodate the changes proposed by respondents.</p> <p>The small meadows on the west side of Park Road (south of the Railway Walk) are included in the ALLS. But other land to the west side is part of very large fields, where features and historic patterns have been lost. The Bridge Street Gateway abounds these fields to the southwest. This other land should not be included in the ALLS.</p> <p>Bears Lane marks a quite sudden change in topography, landscape scale and pattern. To the west, the plateau flattens out and field sizes increase. Historic features are lacking, and the modern village edge dominates. Whereas to the east, the sensitive valley sides have a quite different feel and different sensitivities. The ALLS should not extend to the west as proposed by respondents.</p> <p>LPC adopted our consultant architect's LCSA, when it approved the Reg 15 draft LNP2 for submission to the Local Planning Authority (Babergh District Council). This means LPC agreed with her reasons for the ALLS boundaries. It shares her view that these boundaries should not be changed.</p>
<p>SPECIFIC TRANSPORT CONCERN</p>	
<p>T1. Lavenham should plan for the near future when autonomous vehicles will be the norm:</p> <ul style="list-style-type: none"> • Resident (13) 	<p>The matter of autonomous vehicles was not considered in the Reg 15 draft LNP2 Submission Version (or in any earlier draft of LNP2). We have responded to Resident 13's other concerns, which relate to topics in the Reg 15 draft LNP2 Submission Version. But we have no response to make on the topic of autonomous vehicles.</p>

MATRIX OF REG 16 CONSULTATION REPRESENTATIONS (continued)

LAV 17 – P9. Amend text of Clause 1 (strong preference for up to 12 units) P10. Remove ‘strong’ from Clause 2		X		X	X			X				X	X	X	X
LAV 18 – P11. Amend text of Clause 2 (strong preference for 12 units) P12. Clarify text of Clause 2 (over 60 age restriction) and whether housing is also restricted to those with connection to Lavenham/neighbouring parishes		X													
LAV 19 – P13. Remove LGS 19 (Railway Walk, Public Right of Way)	X														
LAV 27 – P.14 Amalgamate village schools in modern buildings						X									
LAV 28 & 29 – P.15 Make marketing periods 12 months		X													
LAV 31 – P16. Lav Press site singled out (no other single locations) P17. Policy not compliant with NPPF guidelines P.18 Policy was a late addition to earlier LNP2 drafts (which had been available for public scrutiny) P.19 Unfair, disproportionate, no evidence of public support P.20 Policy should be removed completely from LNP2			X												
LAV 33 – P.21 include a Listed Buildings map		X													
LAV 35 & 37 – P22. Extend ALLS to include west side of Park Road Village Gateway P.23 Extend ALLS also to include Bridge Street Road Gateway, and west side of Bears Lane Gateway						X	X								
SPECIFIC TRANSPORT CONCERN															
T1. Lavenham should plan for the near future when autonomous vehicles will be the norm						X									
Organisation or Resident >	1	2	10	11	12	13	14	15	16	17	18	19	20	21	22