

# Elmswell Neighbourhood Plan

Consultation Statement  
January 2023



**Elmswell Parish Council**



Prepared for Elmswell Parish Council by  
Places4People Planning Consultancy  
January 2023



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# 1. Introduction

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Elmswell Neighbourhood Plan.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted; and
  - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

## **2. Background to the preparation of the Neighbourhood Plan**

- 2.1 In 2013 Elmswell Parish Council took the decision to prepare a Neighbourhood Plan to cover the whole parish and in January 2014 the whole parish was designated as the Neighbourhood Area, as illustrated in Map 1. Over the following years the preparation of the Plan was stalled, primarily due to the volume of planning applications for major housing development that redirected the focus of the Parish Council into responding to the proposals. In 2015 Mid Suffolk District Council announced the commencement of the preparation of a new Joint Local Plan for Babergh and Mid Suffolk. The likely impact of the Joint Local Plan on Elmswell was a further matter that caused some slowing down of the Neighbourhood Plan production.
- 2.2 Given the stage at which the Joint Local Plan had reached in 2021 it was considered appropriate to complete the Neighbourhood Plan and put an additional layer of locally based planning policies and designations in place. Although a lot of work took place in the early days of preparing the Plan, having reviewed the situation with the Joint Local Plan, it was decided to limit the content of the Plan to that which would provide a layer of local detail to supplement the higher-level planning policies.

## **3. Regulation 14 Pre-Submission Consultation**

- 3.1 On 21 February 2022 the formal Pre-submission Draft Plan was approved for publication by the Parish Council. Consultation commenced on 11 May 2022 for a period of just over 7 weeks, ending on Thursday 1 July 2022.
- 3.2 A summary leaflet and comments form was prepared, as reproduced in Appendix 1 of this Statement, and distributed to every household and business on the parish. Paper copies of the Plan and comments form were made available at Parish Clerk's Office, Blackbourne and Wesley, Elmswell Library and the Elmswell Tavern. The Plan and supporting documents were also placed on the Neighbourhood Plan pages of the Parish Council website, where there was a link to an online consultation response form. For those unable to complete an online form, the leaflet identified where people could drop off their comments.
- 3.3 The consultation was also widely publicised in the May 2022 edition of the Elmswell Newsletter. The editorial referred to the Plan and Page 27, reproduced in Appendix 2 of this Statement, provided more detail. A copy of the article is reproduced in Appendix 2 of this statement.
- 3.4 The District Council provided a list of statutory consultees to be informed of the consultation, as listed in Appendix 3, and these were notified of the consultation by an email from the Clerk to the Parish Council on 11 May 2022. A copy of the consultation email content is included as Appendix 4.
- 3.5 Details of the responses received during the pre-submission consultation period are detailed later in this Consultation Statement.

## 4. Pre-Submission Consultation Responses

4.1 A total of 76 people or organisations responded to the Pre-Submission Consultation as listed below.

R Arnold	P Goodridge	D Redit
D Austen	S & J Govier	L Reeves
C Balcombe	P Hancock	S Ridgeon
D Barker	S Hancock	J Rogers
J Barker	H Handyside	S Roots
J Barker	D Harris & U Sousa	J Seaborne
B Begg	K Harvey	A Seabourne
G Brett	A Hollings	P Shaw
D Brown	D Hollings	D Shaw
R Brown	J Ibbetson	R Sindell
D Coe	B Instrall	J Spencer
D Collins	S Mansel	H Spencer
S Cooke	D Marsden	J Tooke-Marchant
L Cooke	D McCarthy	L Waspe
K & J Craven	A McGee	J Welford
C Curtis	P Miller	S Welford
P Dow	S Millyard	B Whiddington
P Edmonds	D Overman	A Whiddington
D Forde	J Pursglove	C White
S Fuller	B Pyle	B Yeates

Evolution Town Planning on behalf of Robert Dyball  
Evolution Planning on behalf of Willow Walk Homes  
James Bailey Planning on behalf of JD and RJ Baker Farms Ltd.  
James Bailey Planning on behalf of Bloor Homes  
James Bailey Planning on behalf of Taylor Wimpey Strategic  
Pegasus Group on behalf of Endurance Estates Strategic Land Ltd.  
Richard Brown Planning on behalf of Christchurch Land & Estates (Elmswell South) Limited

M Feeney, ElmsWild  
C Osborne, The Art Society West Suffolk  
T Garner, Elmswell Cricket Club  
Great Ashfield Parish Council  
Historic England  
Avison Young on behalf of National Grid  
Suffolk Wildlife Trust  
Suffolk County Council  
Mid Suffolk District Council

4.2 Appendix 5 of this Statement provides a summary of responses to the consultation questions while the schedule of comments and the responses of the Parish Council are set out in Appendix 6. As a result, the Submission version of the Neighbourhood Plan has been appropriately amended as identified in the “changes made to Plan” rows of the Appendix. Further amendments were made to the Plan to bring it up-to-

date. Appendix 7 provides a comprehensive list of all the modifications to the Pre-Submission Plan following consultation.



## Appendix 1 – Consultation Leaflet

Elmswell Neighbourhood Plan

**Public Consultation Spring 2022**





A Neighbourhood Plan is a way of helping local communities to positively influence the planning of the area in which they live and work. It means you can:

- have a say where new developments should be built and what they should look like
- make sure there are enough community facilities for current and future residents
- protect the local character and landscape, including important green spaces

Neighbourhood Plans form part of the statutory development plan, and this means that, when complete, the District Council must take the Plan into account when deciding planning applications.

#### Background to the Neighbourhood Plan

In 2013 Elmswell Parish Council took the decision to prepare a Neighbourhood Plan to cover the whole parish. Since then, the preparation of the Plan has stalled, primarily due to the volume of planning applications for major housing development in the parish that redirected the focus of the Parish Council into responding to the proposals. In 2015 Mid Suffolk District Council announced the commencement of the preparation of a new Joint Local Plan for Babergh and Mid Suffolk. The likely impact of the Joint Local Plan on Elmswell was a further matter that caused some slowing down of the Neighbourhood Plan production. Consequently, the decision has been taken to limit the content of the Plan to that which would provide a layer of local detail to supplement the higher-level national and local plan policies.

#### The Draft Neighbourhood Plan

We've now reached a major milestone with the consultation on the Draft Plan. Consultation runs for **8 weeks until Friday 1 July**. It's your chance to say whether or not you support the content of the Plan or would like to see some changes. The leaflet contains the details of all the policies and the final page of this leaflet provides a comments form and details of how you can submit your comments.

**It is important that you use this opportunity to have your say, even if you're fully supportive of the Plan content.**

The Neighbourhood Plan itself can be viewed on the Parish Council website at <http://elmswell.suffolk.cloud/> and paper copies of the Plan can be viewed at the Parish Clerk's Office, Blackbourne, The Wesley, Elmswell Library and the Elmswell Tavern.

## PLAN CONTENT

The Neighbourhood Plan covers the following policy matters:

1. **Planning Strategy and Settlement Boundaries**
2. Landscape Character and Views
3. **Local Green Spaces**
4. Sport and Recreation Facilities
5. Employment Sites

### Planning Strategy and Settlement Boundaries

Local plan documents generally define 'settlement boundaries' around the main built-up area of a village such as Elmswell. In general terms, new development will be supported within a settlement boundary whereas outside them, development is only allowed in certain circumstances. The delayed progression of the Joint Local Plan means that the Settlement Boundary for Elmswell will be that defined in the 1998 Mid Suffolk Local Plan until such a time as it is superseded by a new local plan or this Neighbourhood Plan.



We've decided to bring the Settlement Boundary up-to-date and reflect the situation on the ground, rather than wait for the Mid Suffolk Local Plan to be complete. Redefining the Settlement Boundary will not be opening the way for further extensive development in the village, but it will help to provide certainty when any planning applications for come forward. A new Settlement Boundary for Elmswell is defined on **map 1**. It follows that defined in the emerging Joint Local Plan but also takes account of recent planning permissions, which the Neighbourhood Plan can't overturn.



**Policy ELM 1 - Planning Strategy**

The Neighbourhood Area will accommodate development commensurate with its designation as a Key Service Centre in the Mid Suffolk Core Strategy and Core Village in the Joint Babergh Mid Suffolk Local Plan.

The focus for new development will be within the Settlement Boundaries, as defined on the Policies Map [and map 1 of this leaflet], where the principle of development is accepted.

Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and district level strategic policies.

**Landscape Character and Views**

Given the landscape setting of the village, sitting as it does on high ground above the A14 and Black Bourn river, there is a real danger that the further expansion of the village could have significant detrimental impacts on the surrounding landscape and views towards the settlement.

A separate Appraisal of Important Views has been prepared to identify key views from public places (roads or public rights of way) into the built-up area of the village. These key views are identified on **map 2**. Inconsiderate development could have a significant and unwanted detrimental impact on the landscape setting of Elmswell and will not be supported. When proposals for development are being prepared, it will be necessary to take account of the impact on views and demonstrate how proposed new buildings can be satisfactorily accommodated within the landscape.



**Policy ELM 2 - Protection of Important Views**

Important views from public vantage points either within the built-up area or into or out of the surrounding countryside are identified on the Policies Map [and map 2 of this leaflet]. Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Views.

## Green Spaces

There are a number of important open areas within the village that make important contributions to the character and setting of the built environment. The Neighbourhood Plan is able to protect these as Local Green Spaces where they are:

- in reasonably close proximity to the community it serves;
- demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

A separate Local Green Space Appraisal has been undertaken as part of the preparation of the Neighbourhood Plan, which demonstrates how certain local spaces meet the criteria. The spaces that meet the criteria are identified in Policy ELM3. The identification of these spaces as Local Green Space means that development is restricted to that which must be demonstrated as being essential for the site. The sports pitches are covered by a separate policy.



### Policy ELM 3 – Local Green Spaces

The following Local Green Spaces are designated in this Plan and identified on the Policies Map [and map 3 of this leaflet].

1. open space south and west of Hanover Court
2. allotments, Church Hill
3. Cemetery, Church Hill
4. Lukeswood, Church Road
5. amenity open spaces, Pightle Close
6. Crown Mill play area
7. Hall Lane play area
8. playing field off Thedwaste Close





### Sports and Recreation Facilities

Elmswell is especially fortunate to have high quality sports and recreation facilities focused, primarily, at the Blackbourne which is managed on behalf of the Parish Council by the Blackbourne & Wesley Management Association.

It is therefore essential that these facilities are maintained and, when necessary, improved to support healthy lifestyles in future years. The Neighbourhood Plan seeks to protect sport and recreation facilities from being lost, unless an equally good or better recreational facility is provided in an equally accessible location in the village or where it can satisfactorily be demonstrated that the facility is surplus to requirement when assessed against the District Council's adopted standards for that type of facility / pitch and the loss would not result in a shortfall.

#### Policy ELM 4 – Open Space, Sport and Recreation Facilities

Proposals for the provision, enhancement and/or expansion of sport or recreation open space or facilities will be permitted subject to compliance with other Policies in the Development Plan.

Development which will result in the loss of existing sport or recreation open space or facilities, as identified on the Policies Map, will not be allowed unless:

- i. it can be demonstrated that the space or facility is surplus to requirement against the local planning authority's standards for that location, and the proposed loss will not result in a shortfall during the plan period; or
- ii. replacement for the space or facilities lost is made available, of at least equivalent quantity and quality, and in a suitable location to meet the needs of users of the existing space or facility.

Any replacement provision should take account of the needs of the settlement where the development is taking place and the current standards of open space and sports facility provision adopted by the local planning authority.

Where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate. These facilities will be secured through the use of conditions and/or planning obligations.

Clubhouses, pavilions, car parking and ancillary facilities must be of a high standard of design and internal layout. The location of such facilities must be well related and sensitive to the topography, character and uses of the surrounding area, particularly when located in or close to residential areas.

Proposals which give rise to intrusive floodlighting will not be permitted.



### Employment and Business Sites

Elmswell plays an important role in providing employment opportunities for residents and the local area. While a number of individual businesses operate across the parish, the main concentration of business premises can be found at the Station Road Industrial Estate and at Grove Lane Industrial Estate. Changes at these and other employment locations will generally be acceptable provided that such proposals do not result in a detrimental impact on the local landscape (including identified important views), designated heritage assets, residential amenity (including resulting from noise, light and air pollution, loss of privacy and overlooking) and existing highways.

#### Policy ELM 5 - Employment Sites

The retention and development of existing employment and other business uses, including those identified on the Policies Map, will be supported providing such proposals do not have a detrimental impact on the local landscape character (including important views identified on the Policies Map), designated heritage assets, residential amenity (including noise, light and air pollution, loss of privacy and overlooking) and the existing highway network.

Proposals for non-employment or business uses which require planning consent and that are expected to have an adverse impact on employment generation will only be permitted where one or more of the following criteria has been met:

- i. evidence can be provided that genuine attempts have been made to sell/let the site/premises in its current use, and that it can be demonstrated that no suitable and viable alternative employment / business uses can be found or are likely to be found in the foreseeable future;
- ii. the existing use has created over-riding environmental problems (e.g. noise, odours or traffic) and

permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment / business site;

- iii. an alternative use or mix of uses would assist in regeneration and offer greater benefits to the community in meeting local business and employment needs;
- iv. it is for an employment related support facility, such as employment training/education or workplace crèche;
- v. an alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment / business site.

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### **How to view the full Neighbourhood Plan and comment**

The full version of the Plan is available to download from the Parish Council website <http://elmswell.suffolk.cloud/> where an online comments form will also be available to complete. If you don't have access to the internet, paper copies can be viewed at the Parish Clerk's Office, Blackbourne and Wesley, Elmswell Library and the Elmswell Tavern.

### **How to comment**

During the consultation period the Neighbourhood Plan website will have an online survey form which you can complete.

The above venues and contacts will also have printed response forms which you can complete and leave in the post boxes provided or post back to the Parish Council. We want your comments, even if you support everything in the Plan.

### **COMMENTS MUST BE RECEIVED BY 1 JULY - WE CANNOT ACCEPT COMMENTS AFTER THIS TIME**

### **CONSULTATION RESPONSE FORM**

We would prefer receiving responses via the online feedback form at <https://www.smartsurvey.co.uk/s/ElmswellNP/> as it will make the task of collating views much easier. However, if this is not possible, please complete this form.

Further copies of this form can be downloaded from the Parish Council website <http://elmswell.suffolk.cloud/> or you can request one to be delivered to your house by emailing [clerk@elmswellpc.co.uk](mailto:clerk@elmswellpc.co.uk) or phoning **01359 244134** and leaving a message.

If you can't complete the form online, you can drop off your completed form at the Parish Council office at The Council Office, Blackbourne, or in the comments boxes at the Library, or The Wesley.

**Data Protection Notice:** All information collected and processed by the Parish Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended).

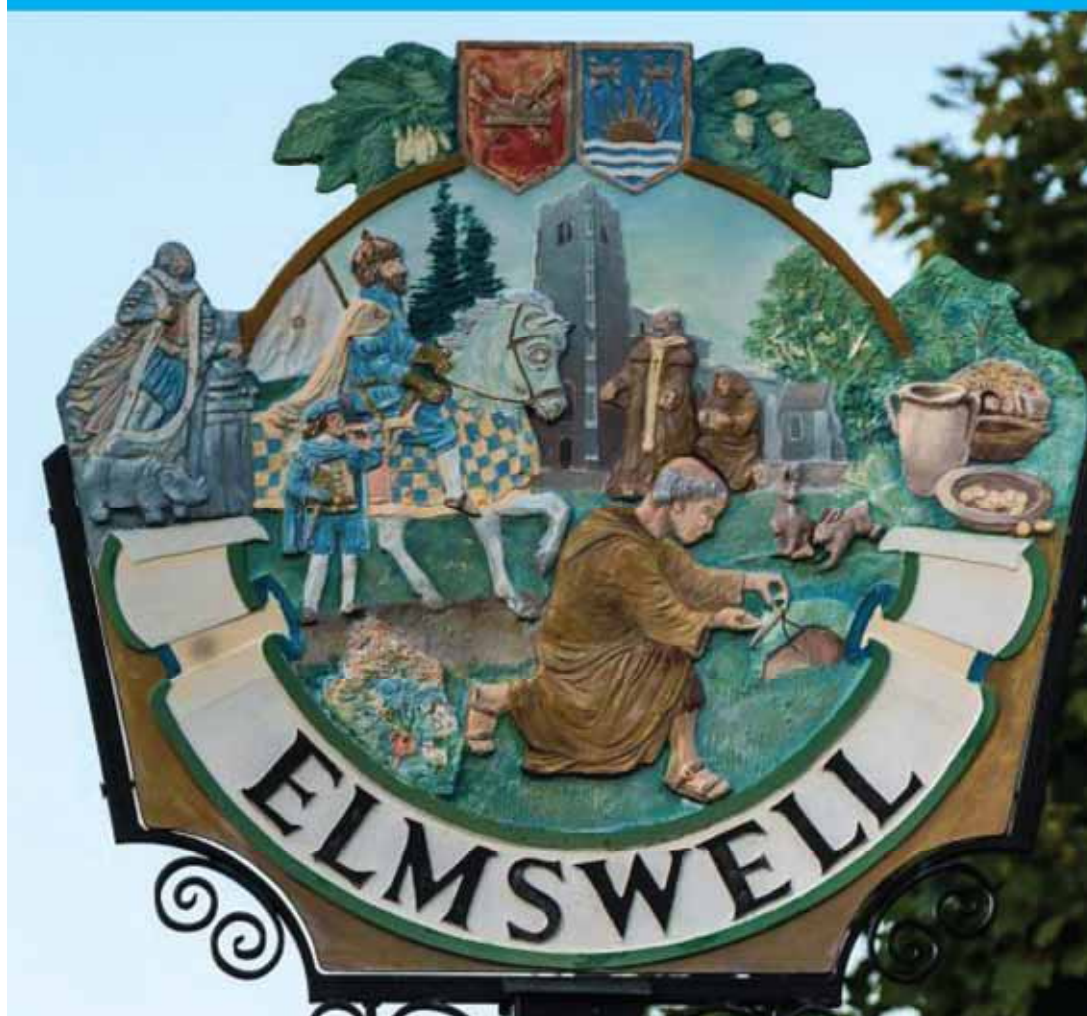
**Please note:** All comments received will be made publicly available and will be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018.

1. Do you support Policy ELM 1 – Spatial Strategy?	YES		NO		No opinion	
If No, please state what changes you would like						
2. Do you support Policy ELM 2 - Protection of Important Views?	YES		NO		No opinion	
If No, please state what changes you would like						
3. Do you support Policy ELM 3 – Local Green Spaces?	YES		NO		No opinion	
If No, please state what changes you would like						
4. Do you support Policy ELM 4 – Open Space, Sport and Recreation Facilities?	YES		NO		No opinion	
If No, please state what changes you would like						
5. Do you support Policy ELM 5 - Employment Sites	YES		NO		No opinion	
If No, please state what changes you would like						
6. Do you have any additional comments on the Draft Neighbourhood Plan?	YES		NO			
Comments						
Name						
Address (optional)						
Organisation you're officially representing (where applicable)						
Email (optional)						
<p>Would you like to be notified when the Parish Council submits the Plan to Mid Suffolk District Council?          (If yes, please provide either address or email address above)</p> <p>YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>Would you be willing to have your contact details shared with Mid Suffolk District Council for the sole purpose of enabling that Council to keep you informed of further consultations on the Plan?</p> <p>YES <input type="checkbox"/> NO <input type="checkbox"/></p> <p>Data will be processed by Mid Suffolk District Council in accordance with their information security policies and Privacy Notice (available on their website).</p>						



# Elmswell Neighbourhood Plan

**Your chance to shape our future**



## Appendix 2 – Elmswell News Article May 2022

### AROUND & ABOUT



## Elmswell Neighbourhood Plan

### Public Consultation Spring 2022



### NEIGHBOURHOOD PLAN

Neighbourhood Plans were introduced in 2011 as part of the Government's Localism Act designed, amongst other things, to give more control to local communities over Planning matters. It has proved to have very mixed results with the Planning Authorities often ignoring the community view regardless of the fact that the Plans are, when finally approved, supposed to be enforceable under Planning Law. Elmswell was one of the first Suffolk parish councils to engage with Mid Suffolk to begin the process as we had already begun the task of updating our Village Plan – a much less formal document and with no power in law at all. However, in those very early days there was a lack of experience and, therefore, guidance as to how to proceed. The process started slowly and has dragged on until now. The size and speed of development in recent years has made the formulation of policies problematic – the goalposts keep changing!

With this edition of the Newsletter is the first public consultation on the proposed Plan. It is, clearly, far from perfect, but it draws a line in the sand and is open to review every 2 years – in fact it has to be reviewed every 2 years to retain its status and thus offers the chance to refine and adjust.

One very important additional consideration is that, once the Plan is officially recognised it attracts a 5% uplift in the financial contribution from every house built in the village. This 'Community Infrastructure Levy' is well worth enhancing in a village where so many houses are under development. The money goes towards the facilities that help retain our thriving community as we welcome so many new households. For this reason alone a response to this initial consultation is important.

## Appendix 3 – Statutory Consultees Notified of Regulation 14 Consultation

Ms Jo Churchill MP, MP for Bury St Edmunds  
Cllr Andy Mellen, County Cllr to Thedwastre North. Suffolk County Council  
Cllr Andrew Stringer, County Cllr to Upper Gipping, Suffolk County Council  
Cllr Sarah Mansel. Ward Cllr to Elmswell & Woolpit  
Dr Helen Geake, Ward Cllr to Elmswell & Woolpit  
Cllr Richard Meyer, Ward Cllr to Walsham-le-Willows  
Cllr Rachel Eburne, Ward Cllr to Haughley, Stowupland & Wetherden  
Cllr Keith Welham, Ward Cllr to Haughley, Stowupland & Wetherden  
Cllr Austin Davies, Ward Cllr to Thurston  
Cllr Harry Richardson, Ward Cllr to Thurston  
Ms C Mason, Clerk to **Wetherden Parish Council**  
Mrs P Fuller, Clerk to **Woolpit Parish Council**  
Mrs J Rowland, Clerk to **Norton Parish Council**  
Ms C White, Clerk to **Great Ashfield Parish Council**  
Ms J Hill. Clerk to **Drinkstone Parish Council**  
Clerk to **Tostock Parish Council**  
Community Planning, **Babergh & Mid Suffolk District Councils**  
SCC Neighbourhood Planning, **Suffolk County Council**  
Land Use Operations, **Natural England**  
Essex, Norfolk & Suffolk Sustainable Places Team, **Environment Agency**  
East of England Office, **Historic England**  
East of England Office, **National Trust**  
Planning Team, **Network Rail Infrastructure Limited**  
**Highways England**  
Stakeholders & Networks Officer, **Marine Management Organisation**  
**Vodafone and O2** - EMF Enquiries  
**Three**  
Estates Planning Support Officer, **Ipswich & East Suffolk CCG & West Suffolk CCG**  
**Transco - National Grid**  
Stakeholder Engagement Team, **UK Power Networks**  
Strategic and Spatial Planning Manager, **Anglian Water**  
**Essex & Suffolk Water**  
**National Federation of Gypsy Liaison Groups**  
**Norfolk & Suffolk Gypsy Roma & Traveller Service**  
**Diocese of St Edmundsbury & Ipswich**  
Chief Executive, **Suffolk Chamber of Commerce**  
Senior Growing Places Fund Co-ordinator, **New Anglia LEP**  
Strategy Manager, **New Anglia LEP**  
Conservation Officer, **RSPB**  
Conservation Officer (Essex, Beds & Herts), **RSPB**  
Senior Planning Manager, **Sport England (East)**  
**Suffolk Constabulary**  
**Suffolk Wildlife Trust**  
Director, **Suffolk Preservation Society**  
Community Development Officer – Rural Affordable Housing, **Community Action Suffolk**  
Senior Manager Community Engagement, **Community Action Suffolk**  
**Dedham Vale Society**

AONB Officer (Joint AONBs Team), **Suffolk Coast & Heath AONB**  
**Theatres Trust**  
**East Suffolk Internal Drainage Board**  
Director       **James Lawson Planning Ltd**  
**Pegasus Planning**  
**James Bailey Planniing**  
**A R Planning**  
**Evolution Town Planning Ltd**  
**Phil Cobbold Planning Ltd**  
**Thrive Architects**

## Appendix 4 – Statutory Consultee Consultation Notice

Dear

ELMSWELL (MID SUFFOLK) NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION  
(REGULATION 14)

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended), Elmswell Parish Council is undertaking a Pre-Submission Consultation on the Draft Neighbourhood Plan for the Parish. Mid Suffolk District Council has provided details of bodies/individuals we are required to consult. We have added to that list developers or their agents of sites currently being developed/proposed for large housing sites in the Parish.

The full plan and supporting documents can be viewed [here](#) together with information on how to send us your comments.




This Pre-Submission Consultation runs until **Friday 1 July 2022**



We look forward to receiving your comments. If possible, please submit them online at <https://www.smartsurvey.co.uk/s/ElmswellNP/> or, if that is not possible, please send them in a reply to this email.



Peter Dow, Clerk



**Elmswell Parish Council**


## Appendix 5 – Summary of Responses

1. Do you support Policy ELM 1 – Planning Strategy?			
Answer Choices		Response Percent	Response Total
1	Yes		84.38% 54
2	No		10.94% 7
3	No opinion		4.69% 3

2. Do you support Policy ELM 2 - Protection of Important Views?			
Answer Choices		Response Percent	Response Total
1	Yes		89.06% 57
2	No		10.94% 7
3	No opinion		0.00% 0

3. Do you support Policy ELM 3 – Local Green Spaces?			
Answer Choices		Response Percent	Response Total
1	Yes		83.08% 54
2	No		16.92% 11
3	No opinion		0.00% 0

4. Do you support ELM 4 – Open Space, Sport and Recreation Facilities?			
Answer Choices		Response Percent	Response Total
1	Yes		95.24% 60
2	No		4.76% 3
3	No opinion		0.00% 0

5. Do you support Policy ELM 5 - Employment Sites?			
Answer Choices		Response Percent	Response Total
1	Yes		88.71% 55
2	No		8.06% 5
3	No opinion		3.23% 2



## 6. Do you have any other comments on the Draft Neighbourhood Plan?

Answer Choices		Response Percent	Response Total
1	Yes	53.13%	34
2	No	46.88%	30

## Appendix 6 - Comments received to Pre-Submission Consultation, Responses to Comments and Proposed Changes


The tables in this appendix set out the comments that were received during the Pre-Submission Consultation Stage and the responses and changes made to the Plan as a result of the comments. The table is laid out in Plan order with the general comments following the comments on the policies. Where proposed changes to the Plan are identified, they relate to the Pre-Submission Draft Plan. Due to deletions and additions to the Plan, they may not correlate to the paragraph or policy numbers in the Submission version of the Plan.

Name	Organisation	Comments
<b>Policy ELM 1 – Planning Strategy</b>		
S Millyard	-	I understand there is planning consent for housing to the East of Warren Lane and the field has not been cultivated recently which is usually a precursor to building; this is not on the MAP1 for development. This area is also one of the stated Views in ELM2 and I think this should be retained as arable land.
B Whiddington	-	Adopting the 1998 plan allows for no further expansion to that which is already underway in the village. There is no scope for any further expansion.
D Overman	N/A	We do need one but even this is stretching the boundary too far for the local infrastructure can cater with.
B Pyle	-	Remove field to west of Pightle Close from settlement boundary as any housing development would spoil Important View identified in ELM 2, destroy richness of wildlife (including Long eared brown bats and barn owls) and remove popular walking and dog walking space.
D Collins	Resident	Elmswell should not be designated as a Key Service area as it does not have the infrastructure or support services to support additional development within the proposed settlement boundary or outside. Without Government or SCC capital expenditure to develop the infrastructure, no further development should proceed, this includes land that has been allocated for further housing ie West and North of Old Bacon Factory and the land adjacent to Parnell Lane.
H Spencer		This policy is already breached by the Hawk End development. As a policy it is weak and fails to be specific allowing it to be undermined by the fact that it is not specific enough and allows lawyers to side step any objections. Designating what sort of development is acceptable in each specific space would mean the village has a say in how the development progresses.
K&J Craven		No more expansion, to big already

Name	Organisation	Comments
R Arnold	-	please see comments below
	Pegasus Group on behalf of Endurance Estates Strategic Land Ltd.	<p>3.3. It is acknowledged that the settlement boundary outlined incorporates the land parcels proposed for allocation through the JLP and the majority of sites which have extant planning permissions, however, our client considers that Policy ELM1 in its current form would preclude development coming forward in otherwise sustainable locations adjacent to Elmswell's urban area. Whilst the settlement boundary proposed may cater for the current needs of the village, the tightly drawn boundary will arbitrarily restrict growth opportunities and limit scope for addressing the requirements of the future.</p> <p>3.4. In addition, "Land to the East of Oak Lane" for which outline planning permission was granted on 29.01.21 (LPA Ref: DC/20/05053) for 9 dwellings has not been included within the boundary shown on the Policies Map proposed. Similarly, whilst "Land East of Warren Lane and West of Cresmedow Way" (LPA ref: 4909/16) which has planning permission for 38 dwellings lies within the settlement boundary outlined, the extended area currently being considered under application LPA ref: DC/21/02956 for 44 dwellings does not fall within the proposed boundary in its entirety. The latter application was recommended for approval at Planning Committee on 09.03.22 but deferred to allow for further work to be undertaken. Nonetheless, it is suggested that the settlement boundary be amended to reflect the permissions/applications referenced above.</p> <p>3.5. Given Elmswell's position in the settlement hierarchy (Core Village) and its inherent sustainability as a location to accommodate growth, the Parish Council should explore the opportunity to positively direct development in sustainable locations within the village through Policy ELM1 and the NP more broadly. This would, ensure the vitality and viability of Elmswell through the delivery of new market/affordable homes and opportunities for the expansion/enhancement of business and community facilities/infrastructure through the plan period and beyond.</p> <p>3.6. As such, it is contended that the policy at present is contrary to the Framework's overarching aim and approach to growth demonstrated by its presumption in favour of sustainable development and, therefore, does not meet with the conditions of Schedule 4b of the Town and Country Planning Act 1990 (as amended). It is recommended that the proposed settlement boundary and wording of Policy ELM1 be reviewed to ensure flexibility across the plan period and align with the Framework's positive stance to development.</p>
	James Bailey Planning Ltd. On behalf of JD and RJ Baker Farms Ltd	We request that the Neighbourhood Plan settlement boundary should be slightly amended to incorporate the entire site off Warren Lane / Cresmedow Way (ref: DC/21/02956) as per the benefits and justification identified within the supporting letter sent along with this form. See extent of site boundary in Appendix 1.

Name	Organisation	Comments
	James Bailey Planning Ltd. on behalf of Bloor Homes	<p>We are pleased to see that the Neighbourhood Plan has sought to redraw the settlement boundary to now include “Development Sites with planning permission or recently constructed”. This seems to be a highly sensible way forward, by embracing decisions that have already been taken, and for providing certainty for all over the next few years.</p> <p>This identified growth areas in the Neighbourhood Plan will deliver a variety of homes to the village, along with necessary infrastructure. At the same time, it will also ensure that the community are rewarded with the increased CIL receipts that only comes with proactive communities that have a ‘Made’ Neighbourhood Plan in place.</p> <p>The policy ELM1 identifies the new settlement boundary for Elmswell, which will include the Bloor Homes site off School Road. This will be delivering 86 new dwellings, including 30 affordable units, along with: an early years school; landscaping and open space; and a series of highways improvements. These highways improvements have been seen as critical by the local community, and include junction improvements to Church Road and School Road; road widening; and increased safety markings. The site will also be contributing towards the physical provision of a significant proportion of the footpath and cycleway link between the villages of Elmswell and Woolpit.</p> <p><b>Comments Form Comments</b></p> <p>The proactive direction the Elmswell Neighbourhood Plan steering group and Parish Council have taken by redrawing the settlement boundary to include “Development Sites with planning permission or recently constructed” is to be commended. Not only is this sensible to incorporate the planning consents that Elmswell has already received over the last few years which is fixed, it helpfully shows the community how their village will change in the future. This growth will deliver much needed housing, including affordable homes, to the village, as well as increasing CIL receipts to 25% (instead of 15%) once the Neighbourhood Plan is ‘Made’, which will be passed to the Parish Council to spend locally.</p> <p>The ELM1 Settlement Boundary includes the Bloor Homes Eastern site for Reserved Matters planning application (DC/22/01615) for 86 dwellings (30 affordable units), including landscaping, early years provision, open space and highways improvements such as road widening and the provision of some of the cycle/footpath link between the villages of Elmswell and Woolpit.</p> <p>A suggested modification is for the route of the proposed Elmswell and Woolpit cycle/footpath to be identified within the draft Neighbourhood Plan on the Policies Map, which the above planning application is delivering a significant part of.</p>

Name	Organisation	Comments
	James Bailey Planning on behalf of Taylor Wimpey Strategic	<p>I am writing on behalf of our clients Taylor Wimpey Strategic Land, who are the landowners for the site off St. Edmunds Drive / Station Road, Elmswell. (See Appendix One for Site Location Plan)</p> <p>Taylor Wimpey are pleased to see their site included within the Neighbourhood Plan, and would like to offer their support for the draft Elmswell Neighbourhood Plan and the approach that has been taken.</p> <p>Accordingly, we would like the following to be considered as part of our submission to this Regulation 14 consultation period:</p> <ul style="list-style-type: none"> <li>• This Covering Letter;</li> <li>• Site Location Plan (Appendix One); [reproduce below]</li> <li>• Site Constraints and Opportunities Plan (Appendix Two); and</li> <li>• Comments Form.</li> </ul>

Name	Organisation	Comments
		 <p>The map displays a site boundary in red, situated between St Edmund's Drive and Station Road. The surrounding area includes residential buildings and a school area near School Road. A legend in the top right corner identifies the red boundary as 4.30ha. A scale bar indicates 0 to 10 meters. The map is part of a document from CSA Environmental, dated Dec 2019.</p>






Name	Organisation	Comments
		<p>The approach taken towards the streamlined Elmswell Neighbourhood Plan is a positive one and is fully supported by Taylor Wimpey. It is felt that the document it is very much in keeping with the intentions of how a Neighbourhood Plan should be prepared - short and concise, whilst importantly identifying areas for growth and areas to protect.</p> <p>We have noted that the site off St. Edmunds Drive / Station Road is included within the proposed Settlement Boundary (ELM1) for Elmswell. Taylor Wimpey endorses this approach, and their sites inclusion within the future settlement boundary, as they very much see their site as being part of the village, given its location within Elmswell and its proximity to their existing adjacent Kingsbrook site.</p> <p>Taylor Wimpey therefore support the future Settlement Boundary and policy ELM1.</p> <p>The site off St. Edmunds Drive / Station Road has been identified and assessed through the Babergh and Mid Suffolk emerging Joint Local Plan process to-date. It features as the allocation 'land west of Station Road (LA066)', and is included as an important site for the continued sustainable growth of Elmswell during the extended Plan period.</p> <p>The site is identified for the delivery of approximately 100 new dwellings, and is also required to consider the following:</p> <ul style="list-style-type: none"> <li>• existing rights of way across the site;</li> <li>• traffic matters at Elmswell;</li> <li>• contributions towards the pedestrian and cycle link between Elmswell and Woolpit;</li> <li>• education contributions; and</li> <li>• healthcare contributions.</li> </ul> <p>Opportunities &amp; Constraints Plan (See Appendix Two) [reproduced below]</p>

Name	Organisation	Comments
		 <p>The attached Opportunities &amp; Constraints Plan that accompanies this submission has been prepared by CSA on behalf of Taylor Wimpey, and identifies the areas that need to be addressed when bringing this scheme forward.</p>

Name	Organisation	Comments
		<p>This identified site has the ability to deliver a variety of homes to the village, that will meet local and District needs. At the same time, it will also look to bring forward the necessary infrastructure to create a sustainable development that will enhance the village of Elmswell.</p> <p>Public Rights of Way A key element for this site is the importance of maintaining and enhancing the footpaths and connections across the site. These have been identified on the Elmswell Neighbourhood Plan Policies Map, and feature on the Opportunities &amp; Constraints Plan.</p> <p>There is the opportunity to enhance these connections with defined routes, markings, and appropriate landscaping, so that these public rights of way are integrated into Taylor Wimpey's proposals for the site.</p>
	<p>Evolution Town Planning on behalf of Robert Dyball</p>	<p>PLEASE SEE CHAPTER 3 OF THE ATTACHED REPORT. [Appended at the end of this Appendix]</p> <p>We have concerns about policy ELM 1 as currently drafted. It states: 'The Neighbourhood Area will accommodate development commensurate with its designation as a Key Service Centre in the Mid Suffolk Core Strategy and Core Village in the Joint Babergh Mid Suffolk Local Plan. The focus for new development will be within the Settlement Boundaries, as defined on the Policies Map, where the principle of development is accepted. Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and district level strategic policies.'</p> <p>This policy cross refers to a plan appended to the Neighbourhood Plan which seeks to provide a Settlement Boundary based on the Joint Local Plan, and recent planning permissions, as paragraph 3.3 states: 'Given the level of development that's taken place in Elmswell since 1998, the Settlement Boundary bears little resemblance to what is on the ground. The preparation of the Neighbourhood Plan therefore provides as opportunity to bring the Settlement Boundary up to-date and reflect the situation on the ground. At the same time, redefining the Settlement Boundary will not be opening the way for further extensive development in the village. In order to provide clarity to the planning process, a new Settlement Boundary for Elmswell is defined on the Policies Map at the rear of this document. It follows that defined in the emerging Joint Local Plan but also takes account of recent planning permissions.'</p>

Name	Organisation	Comments
		<p>However, in reviewing this proposed Settlement Boundary, we consider that this map is incorrect and needs amending to ensure that all residential properties on the edge of the settlement have been included, including all of those with planning permission.</p> <p>Errors in proposed Settlement Boundary Sites currently excluded in error, but which ought to have been included, are set out in the table below:</p>


Site	Map
<p><b>Willow Farm</b></p> <p>Willow Farm contains an existing residential development and has Prior Approval for the development of 4 new dwellings (DC21/02551).</p> <p>As such, this site should be included within the development boundary as a site with planning permission.</p>	 <p>The map shows a residential area with several farms. Willow Farm is highlighted with a purple outline, indicating it is within the development boundary. Other labeled areas include Mulberry Farm, House Farm, and Berost. A red line traces the development boundary through the area.</p>
<p><b>Bennetts Farm</b></p> <p>To the north of the former Dagwood Farm (which has been extensively developed for housing), Bennetts Farm has recently had a new residential dwelling approved. This has been excluded from the Neighbourhood Plan proposals map (DC/20/01999).</p> <p>As such, this site should be included within the development boundary as a site with planning permission.</p>	 <p>The map shows an area with Dagwood Farm and Oak Farm. Bennetts Farm is highlighted with a purple outline, indicating it is within the development boundary. A red line traces the development boundary, which includes Ashfield Road. The area is bounded by a red line and a dashed line.</p>
<p><b>Oak Lane</b></p> <p>To the east of Oak Lane, planning permission has been granted for the development of 9 homes (DC/20/05053) and this scheme has been omitted from inclusion within the development boundary.</p>	 <p>The map shows a residential area with Oak Lane. A site to the east of Oak Lane is highlighted with a purple outline, indicating it is within the development boundary. A red line traces the development boundary, which includes Oak Lane. The area is bounded by a red line and a dashed line.</p>

Name	Organisation	Comments
		<p>All of the above sites have planning permission for residential development, and therefore, in accordance with paragraph 3.3 of the Neighborhood Plan, these sites ought to have been included within the proposed development boundary. As well as sites already in the planning system awaiting approval such as DC/21/06379 for 19 homes on the Grove Lane, Ashfield rd. corner if it is approved.</p> <p><b>Missed Opportunity to Positively Plan for Growth</b>  Our client also objects to this statement contained within the Neighbourhood Plan, at paragraph 3.3: 'redefining the Settlement Boundary will not be opening the way for further extensive development in the village'. We consider that not supporting future growth within Elmswell is short sighted and not an example of the plan being 'positively prepared'. The NPPF anticipates that Neighbourhood Plans should look to allocate some sites for housing to meet a local need – and in not doing so, the Neighborhood Plan will instead be subject to allocations made at the Development Plan level, via the Joint Local Plan.</p> <p>As set out above, the village of Elmswell is identified as a 'Key Service Centre' by the Core Strategy Policy CS1 'Settlement Hierarchy' and, as such, is identified as the main focus for growth outside of towns. In the emerging Joint Local Plan, the LPA has identified the village as a 'Core Village', continuing to ensure that the settlement is a focus for growth. The Joint Local Plan states at policy SP03:  'Ipswich Fringe settlements, Market Towns/Urban Areas and <b>Core Villages will act as a focus for development, which will be delivered through site allocations in the Plan and/ or in Neighbourhood Plans</b>, and windfall development in accordance with the relevant policies.'</p> <p>It is clear, therefore, that where Neighbourhood Plans exist, the JLP envisages that allocations should be made. By failing to allocate any sites, the Neighbourhood Plan cannot be said to be in 'general conformity' with the emerging development plan.</p> <p>As such, we consider that as well as not reflecting all of the sites which currently have planning permission, this Neighbourhood Plan has missed an opportunity to plan positively for growth in Elmswell in accordance with the development plan, by not allocating sites for future housing growth.</p> <p><b>Oak Lane – Opportunity for Growth</b>  Our client would be willing to support the proposed policy ELM1 and the development boundary, if the policy were amended to support new allocations within the development boundary, and if the development boundary were</p>

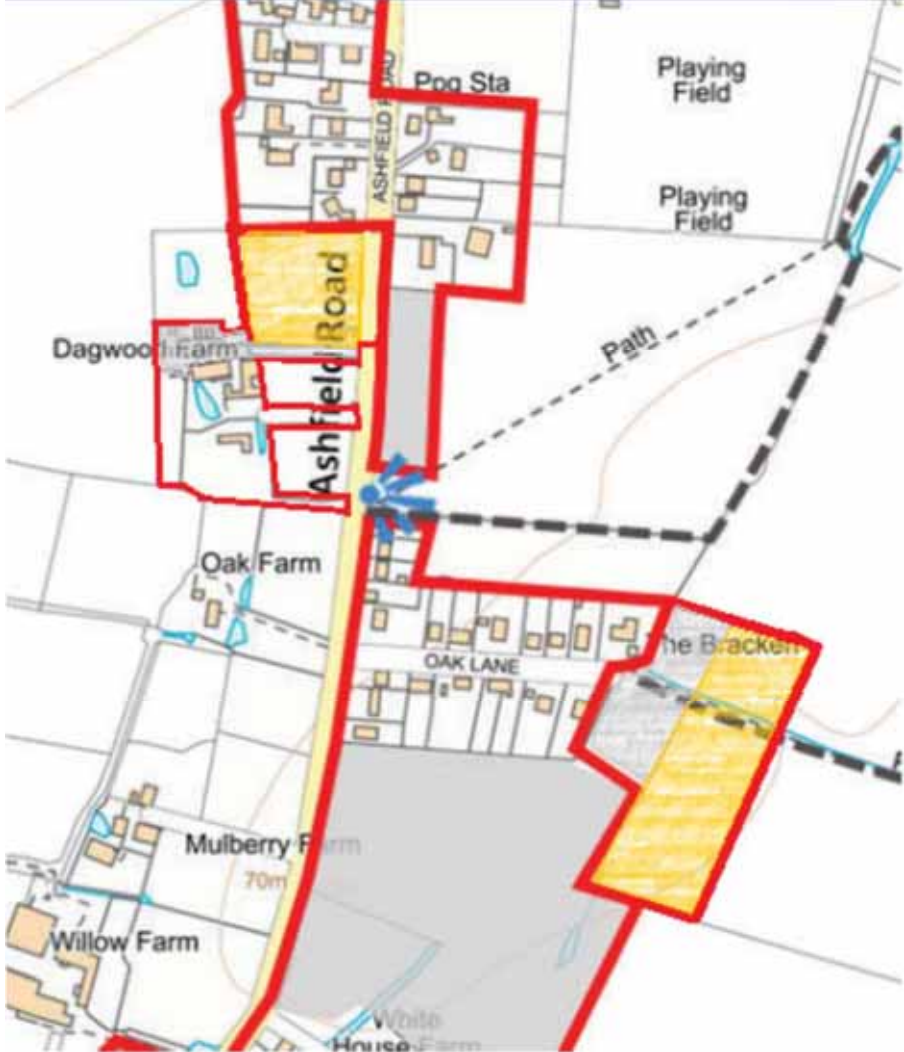


Name	Organisation	Comments
		<p data-bbox="685 236 2018 339">expanded to include appropriate opportunities. In particular, our client would support the inclusion of a potential 'phase 2' at Oak Lane, which provides an ideal development opportunity to come forward at early stages of the plan, off an existing highways access.</p>  <p data-bbox="685 1209 1491 1238">Oak Lane Approved Scheme (Red) and Possible New Allocation (Yellow)</p> <p data-bbox="685 1281 2018 1347">The approved scheme at Oak Lane has allowed for an access to be provided onto the proposed allocation site, so that a new phase could very easily be accessed and serviced:</p>



Name	Organisation	Comments
		 <p data-bbox="685 791 1055 818">Access to Possible Allocation Site</p> <p data-bbox="685 935 1238 962"><b>Ashfield Road Paddock – Opportunity for Growth</b></p> <p data-bbox="685 970 2018 1070">In addition, our client owns a paddock which fronts Ashfield Road and is free from development constraints which could hinder development. The site is approximately 0.5ha in size, and is therefore a small-scale development opportunity which the NPPF supports.</p> <p data-bbox="685 1114 2007 1214">This site would provide a natural extension / infilling of the settlement boundary and offers a development opportunity for 10-15 dwellings. We consider that this site could easily be included within the settlement boundary, in order to provide for the natural growth of the settlement.</p> <p data-bbox="685 1257 2018 1321">This is a location which has been accepted as sustainable and well connected to public services, and as such, it could be delivered very easily.</p> <p data-bbox="685 1364 842 1391">Amendments</p>

Name	Organisation	Comments
		<p>Our client would be willing to support Policy EML1 if the development boundary was expanded to include new sites for development and if the following amendment to paragraph 3.3 were made:</p> <p>'Given the level of development that's taken place in Elmswell since 1998, the Settlement Boundary bears little resemblance to what is on the ground. The preparation of the Neighbourhood Plan therefore provides as opportunity to bring the Settlement Boundary upto-date and reflect the situation on the ground. At the same time, redefining the Settlement Boundary will not be opening the way for further extensive development in the village, <b>but the Settlement Boundary will be redefined for an appropriate level of continued growth in accordance with the settlement's status as a 'Core Village' in the development plan.</b> In order to provide clarity to the planning process, a new Settlement Boundary for Elmswell is defined on the Policies Map at the rear of this document. It follows that defined in the emerging Joint Local Plan but also takes account of recent planning permissions.'</p> <p>Our client would support the following amendment to the settlement boundary:</p>

Name	Organisation	Comments
		 <p data-bbox="685 1294 1272 1329">Supported Amended to the Development Boundary</p> <p data-bbox="685 1366 1518 1396">Were these amendments made, our client would fully support policy ELM1.</p>

Name	Organisation	Comments
	Evolution Planning on behalf of Willow Walk Homes	<p data-bbox="685 309 1733 336">PLEASE SEE CHAPTER 3 OF THE ATTACHED REPORT. [Appended at the end of this Appendix]</p> <p data-bbox="685 379 1435 406">We have concerns about policy ELM 1 as currently drafted. It states:</p> <p data-bbox="685 416 2029 480">'The Neighbourhood Area will accommodate development commensurate with its designation as a Key Service Centre in the Mid Suffolk Core Strategy and Core Village in the Joint Babergh Mid Suffolk Local Plan.</p> <p data-bbox="685 488 1968 552">The focus for new development will be within the Settlement Boundaries, as defined on the Policies Map, where the principle of development is accepted.</p> <p data-bbox="685 560 2029 624">Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and district level strategic policies.'</p> <p data-bbox="685 667 2000 730">This policy cross refers to a plan appended to the Neighbourhood Plan which seeks to provide a Settlement Boundary based on the Joint Local Plan, and recent planning permissions, as paragraph 3.3 states:</p> <p data-bbox="685 738 2029 946">'Given the level of development that's taken place in Elmswell since 1998, the Settlement Boundary bears little resemblance to what is on the ground. The preparation of the Neighbourhood Plan therefore provides as opportunity to bring the Settlement Boundary up-to-date and reflect the situation on the ground. At the same time, redefining the Settlement Boundary will not be opening the way for further extensive development in the village. In order to provide clarity to the planning process, a new Settlement Boundary for Elmswell is defined on the Policies Map at the rear of this document. It follows that defined in the emerging Joint Local Plan but also takes account of recent planning permissions.'</p> <p data-bbox="685 989 2000 1085">However, in reviewing this proposed Settlement Boundary, we consider that this map is incorrect and needs amending to ensure that all residential properties on the edge of the settlement have been included, including all of those with planning permission.</p> <p data-bbox="685 1128 1137 1155"><b>Errors in proposed Settlement Boundary</b></p> <p data-bbox="685 1165 2013 1367">If the aim of the new settlement boundary is to 'take account of recent planning permissions', then the current settlement boundary fails to do this. We are aware that a number of sites with planning permission have been excluded from the settlement boundary, which leads to the settlement boundary not accurately reflecting the current context of development in the area. Of particular concern to our client is the exclusion of their development site on Oak Lane, which is due to commence development soon. As such, our client objects to the settlement boundary as currently drafted.</p>


Name	Organisation	Comments
		<p data-bbox="685 272 2029 336">To the east of Oak Lane, planning permission has been granted for the development of 9 homes (DC/20/05053) and this scheme has been omitted from inclusion within the development boundary.</p>  <p data-bbox="685 1225 1576 1257">Site with Planning Permission, Wrongly Excluded from The Settlement Boundary</p> <p data-bbox="685 1297 1944 1361">This scheme has passed through outline stage and a scheme will shortly be submitted to the LPA for full reserved matters approval for the development of 9 homes as shown below (ref: DC/22/01189):</p>



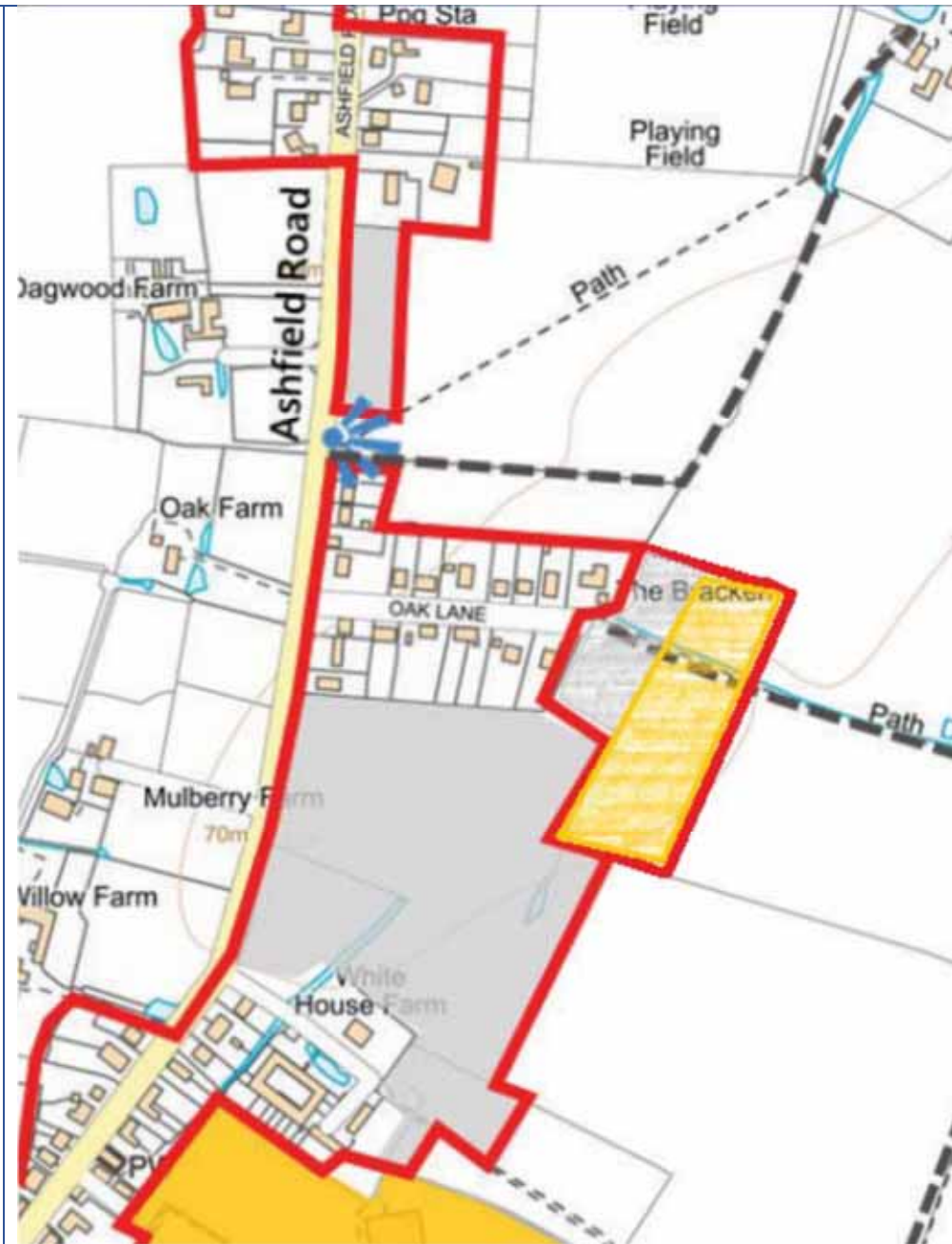


Name	Organisation	Comments
		<p>Figure.1 Reserved Matters Layout, Oak Lane</p> <p>Since this site has been granted outline planning permission, and the reserved matters stage will shortly be underway, in accordance with paragraph 3.3 of the Neighborhood Plan, this site ought to have been included within the proposed development boundary. Willow Walk Homes, therefore, object to the exclusion of this site from the settlement boundary.</p> <p><b>Missed Opportunity to Positively Plan for Growth</b></p> <p>Willow Walk Homes also object to this statement contained within the Neighbourhood Plan, at paragraph 3.3: 'redefining the Settlement Boundary will not be opening the way for further extensive development in the village'.</p> <p>We consider that not supporting future growth within Elmswell is short sighted and not an example of the plan being 'positively prepared'. The NPPF anticipates that Neighbourhood Plans should look to allocate some sites for housing to meet a local need – and in not doing so, the Neighborhood Plan will instead be subject to allocations made at the Development Plan level, via the Joint Local Plan.</p> <p>As set out above, the village of Elmswell is identified as a 'Key Service Centre' by the Core Strategy Policy CS1 'Settlement Hierarchy' and, as such, is identified as the main focus for growth outside of towns. In the emerging Joint Local Plan, the LPA has identified the village as a 'Core Village', continuing to ensure that the settlement is a focus for growth. The Joint Local Plan states at policy SP03:</p> <p>'Ipswich Fringe settlements, Market Towns/Urban Areas and <b>Core Villages will act as a focus for development, which will be delivered through site allocations in the Plan and/ or in Neighbourhood Plans</b>, and windfall development in accordance with the relevant policies.'</p> <p>It is clear, therefore, that where Neighbourhood Plans exist, the JLP envisages that allocations should be made. By failing to allocate any sites, the Neighbourhood Plan cannot be said to be in 'general conformity' with the emerging development plan.</p> <p>As such, we consider that as well as not reflecting all of the sites which currently have planning permission, this Neighbourhood Plan has missed an opportunity to plan positively for growth in Elmswell in accordance with the development plan, by not allocating sites for future housing growth.</p>

Name	Organisation	Comments
		<p data-bbox="685 236 2029 411">Willow Walk Homes would be willing to support the proposed policy ELM1 and the development boundary, if the policy were amended to support new allocations within the development boundary, and if the development boundary were expanded to include appropriate opportunities. In particular, Willow Walk Homes would support the inclusion of a potential 'phase 2' at Oak Lane, which provides an ideal development opportunity to come forward at early stages of the plan, off an existing highways access.</p>  <p data-bbox="685 1262 1491 1289">Oak Lane Approved Scheme (Red) and Possible New Allocation (Yellow)</p> <p data-bbox="685 1331 2029 1394">The approved scheme at Oak Lane has allowed for an access to be provided onto the proposed allocation site, so that a new phase could very easily be accessed and serviced:</p>

Name	Organisation	Comments
		 <p data-bbox="685 826 1057 855">Access to Possible Allocation Site</p> <p data-bbox="685 898 2027 1249">Our client would be willing to support Policy EML1 if the development boundary was expanded to include new sites for development and if the following amendment to paragraph 3.3 were made:  'Given the level of development that's taken place in Elmswell since 1998, the Settlement Boundary bears little resemblance to what is on the ground. The preparation of the Neighbourhood Plan therefore provides as opportunity to bring the Settlement Boundary up-to-date and reflect the situation on the ground. At the same time, redefining the Settlement Boundary will not be opening the way for further extensive development in the village, <b>but the Settlement Boundary will be redefined for an appropriate level of continued growth in accordance with the settlement's status as a 'Core Village' in the development plan.</b> In order to provide clarity to the planning process, a new Settlement Boundary for Elmswell is defined on the Policies Map at the rear of this document. It follows that defined in the emerging Joint Local Plan but also takes account of recent planning permissions.'</p> <p data-bbox="685 1289 1576 1318">Our client would support the following amendment to the settlement boundary:</p>








Name	Organisation	Comments
		Supported Amended to the Development Boundary  Were these amendments made, our client would fully support policy ELM1.
	Richard Brown Planning on behalf of Christchurch Land & Estates (Elmswell South) Limited	It is considered that the policy is too restrictive and should be amended to allow development on an “exception” type basis. The policy should acknowledge that development outside the settlement boundary may be the only way of responding to the need, for example, for Care Home bedspaces and care or retirement accommodation.
	Mid Suffolk District Council	We have no specific comment to make on this Policy but please see our general comment above about referring to the Joint Local Plan.
<p><b>Parish Council response:</b></p> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• The site east of Warren Lane is shown in grey on Inset South as a development site with planning permission.</li> <li>• The Neighbourhood Plan has to conform with the Local Plan, which designates Elmswell as a Key Service Centre.</li> <li>• The 1998 Local Plan will eventually be superseded by the Babergh Mid Suffolk Joint Local Plan. The proposed Part 2 of that Local Plan, which will allocate sites for development, is expected to commence preparation later in 2023.</li> <li>• The policy is tried and tested in other neighbourhood plans and has been successful in resisting development outside the Settlement Boundary.</li> <li>• The Neighbourhood Plan does not allocate additional housing sites and, given the current uncertainties with the Joint Babergh Mid Suffolk Local Plan, there is no need to pre-empt the outcome of the preparation of Part 2 of that Plan and allocate sites given that the District Council is required to review the spatial distribution of housing across the district and the suitability of sites to meet the housing need.</li> <li>• The indication of the site north of St Edmunds Drive and its inclusion within the Settlement Boundary was included in error as the site has not got the benefit of planning permission but was identified as an allocation in the Joint Local Plan prior to the Planning Inspectors requiring that, through modifications, all new allocations are deleted from that Plan and reassessed. The Policies Map will be amended accordingly.</li> <li>• The current adopted Local Plan does not specify the minimum requirement for additional housing in the village and the figures in the Submission Joint Local Plan now have no weight given the Local Plan Inspectors’ requirements to deal with the housing distribution and site allocations in a new Part 2 Local Plan.</li> <li>• The site east of Warren Lane the subject of planning application DC/21/02956 has not been granted planning consent and therefore it is not appropriate to adjust the Settlement Boundary to include the extent of the site.</li> <li>• The Settlement Boundary will be amended to include the extent of the planning permission (DC/20/05053)</li> <li>• It is not considered necessary to include the areas suggested at Willow Farm and Bennetts Farm within the Settlement Boundary.</li> </ul>		
<p><b>Proposed changes:</b></p>		

Name	Organisation	Comments
		<ul style="list-style-type: none"> <li>Amend the Settlement Boundary Inset North of the Policies Map to include land granted planning consent under application DC/20/05053.</li> <li>Amend Inset North and Inset South of the Policies Map to delete the land indicated with planning permission north of St Edmunds Drive and realign the Settlement Boundary accordingly.</li> </ul>
<b>Policy ELM 2 - Protection of Important Views</b>		
-	-	Extra vantage point should be included from the footpath that leads up the hill away from Elmswell Hall.
D Overman	N/A	There are other views especially near the church looking across the fields towards Elmswell Hall. Also Blackbourne towards Lords Bridge.
B Pyle	-	Move Important View west of Pightle Close up to housing so that the view, protected oak tree and field between Pight Close and School Road are included. It is a popular picnic, playing and walking area for all ages that doesn't mean crossing a busy and dangerous School Road.
A McGee	-	The viewpoints already noted are appreciated but the proposal could go further. The open area off Church Road towards the site of the old school is a much valued open area which is used by the community. This has an important viewpoint over the surrounding villages and should also be formally recognised on the map.
K Harvey	-	Whilst supporting these important views in principal it is unfortunate that View 7 (East of Ashfield Rd.) is already being built on. In fact the photograph shows one of the builders marker stakes! N.B. This document includes views 11 to 19 which are of the Ipswich area. Did no one proof read this before publication? There is also reference to a View 10 which does not exist.
J Tooke-Marchant	-	The view from Warren Lane has already been ruined by industrialisation. Can the negative impacts be limited through reducing the height of lighting? Can we prevent further creeping industrialisation?
D Collins	Resident	the notion is excellent but given the land that has already been allocated for development this policy seems impossible to implement, unless action to stop further development is made
M Feeney	ElmsWild	Pages 8-12 (Views 11-19) do not apply to Elmswell.
H Spencer	-	Be more specific, e.g. all the sight-lines where you can see the parish church cannot be blocked. If its good enough for St. Paul's in London, it is good enough for Elmswell. Be more specific in your approach.
J Ibbetson	private and none official view of vice chair Elmswild	There are several views that are missing in particular the views from Lukeswood southward. The general presentation of views is poor.
K&J Craven	-	The village has gradually expanded & views have been eroded so sad
Anonymous		Pages 8-12 (views 11-19) of the Appraisal of Important Views do not apply to Elmswell
	Pegasus Group on behalf of Endurance	3.7. The draft NP identifies two public vantage points on the Policies Map either within the built-up area or into or out of the surrounding countryside which are to be protected under Policy ELM 2. In addition to the Suffolk Landscape

Name	Organisation	Comments
	Estates Strategic Land Ltd.	Character Assessment, a separate assessment has been used to identify the views selected. Our client agrees with the principle of ensuring that development does not have a detrimental visual impact on these important views, recognising the role of Landscape and Visual Impact Assessments in decision making, and, therefore, supports Policy ELM 2.
	James Bailey Planning Ltd. On behalf of JD and RJ Baker Farms Ltd	On the basis of the previously consented development and evidence base documents that underpin the emerging Joint Local Plan, it is our opinion that the application proposal (DC/21/02956) has been carefully designed on a landscape and visually led basis, and will not, in overall terms to generate an unacceptable landscape and visual impact (as evidenced in the submitted LVIA and with due regard to the evidence base supporting the emerging Joint Local Plan). However, the wording of the policy is currently subjective, and the NP evidence to be relied upon does not meet the basic conditions by contributing to sustainable development as there is not sufficient and proportionate evidence presented to guide development to sustainable solutions (i.e. what would and wouldn't be acceptable).
	Evolution Town Planning on behalf of Robert Dyball	<p>We have concerns about policy ELM 2, and more precisely the supporting documentation, upon which it is based. It states:</p> <p>'Important views from public vantage points either within the built-up area or into or out of the surrounding countryside are identified on the Policies Map. Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Important Views.'</p> <p>This policy is accompanied by the identification of 9 'important views', including 6 on land to the rear of our client's development sites.</p> <p>We have concerns about the soundness of the supporting document which seeks to provide supporting evidence for this policy and justification as to why the views are considered as important.</p> <p>We are concerned that this supporting document provides an assessment which is flawed, since the document simply sets out the first 9 views which are identified as 'protected important views' and no methodology is set out as to why these views were selected. No rationale is provided for which views were assessed and other potential views which were not assessed.</p> <p>Moreover, 9 additional views were assessed and are included in the assessment at views 11 to 19, but there is no evidence submitted as to why views 1-9 were considered as important and why views 11-19 were not considered worthy of protection. No information is supplied as to who 'the receptors' of the views might be; how heavily footpaths are used,</p>

Name	Organisation	Comments
		<p>and what the sensitivity to change would be likely to be in these locations; and whether there would be opportunities for improvements in these views. There was no logic provided for which assessed views were then included and which assessed views were excluded. Overall, the background evidence is confusing and lacks any independent rational.</p> <p><b>Error at 'View 6'</b></p> <p>We have particular concerns about the selection of view 6. We note that the text states that the importance of this view is that it shows 'how new development in the village sits within its countryside setting' and 'any additional development must be sympathetic to its countryside setting'.</p> <p>However, when we compare the location of the 'protected view' with what the image shows and the description of the view, we consider that the protected view has actually been marked on the wrong footpath and that this point is shown in error.</p> <p>In reality, view 6 should be marked at the point marked by the red dot below, as that is where the photograph was taken and that matches the description provided.</p>

Name	Organisation	Comments
		<div data-bbox="725 252 1742 951" data-label="Image"> </div> <div data-bbox="1272 256 1742 707" data-label="Text"> <p><b>View 6</b> View south west from public footpath.</p> <p>The view demonstrates how new development in the village sits within its countryside setting. Any additional development must be sympathetic to its countryside setting.</p> </div> <p data-bbox="685 959 927 986">Incorrect Viewpoint 6</p> <p data-bbox="685 1031 2033 1238">In actual fact, view 6, as marked on the map, is not a view which has any special characteristics. This view is dominated by the mid 20th century barn at Willow Farm, which has an asbestos roof and dominates the view of the Listed Farmhouse behind. This view has actually been separately identified by the LPA as one which would be improved with the removal of the barn, and therefore requires improvements. If this view were identified for 'protection', this could harm opportunities to deliver enhancements to the site of Willow Farm which would have the benefit of improving the view of the site.</p> <p data-bbox="685 1281 2020 1343">The photograph below shows the actual viewpoint from point 6, and we set out below aspects of this view which should be improved, rather than protected.</p>

Name	Organisation	Comments
		 <p data-bbox="689 831 1288 858">Correct View from Viewpoint 6, as Currently Identified</p> <p data-bbox="689 903 1339 930">Elements of this viewpoint which require improvement are:</p> <ul data-bbox="734 943 1417 1046" style="list-style-type: none"> <li data-bbox="734 943 1330 970">• Removal of the dominant twentieth century barn.</li> <li data-bbox="734 978 1417 1005">• Better revealing of the Listed Building, Willow Farmhouse</li> <li data-bbox="734 1013 1391 1040">• Restoration of the historic setting of the Listed Building</li> </ul> <p data-bbox="689 1054 2018 1190">Since there are elements of this view which require improvement, we would oppose any attempt to include this wrongly identified 'viewpoint 6' as a protected view. Rather we consider that the map provided at View 6 of the 'Appraisal of Views, April 2022' needs to be corrected as shown below, to correctly identify the location shown in the photograph supplied in the document:</p>




Name	Organisation	Comments
		<div data-bbox="689 233 1249 711" data-label="Image"> </div> <div data-bbox="1256 233 1760 280" data-label="Section-Header"> <p><b>View 6</b></p> </div> <div data-bbox="1256 280 1760 320" data-label="Text"> <p>View south west from public footpath.</p> </div> <div data-bbox="1256 320 1760 440" data-label="Text"> <p>The view demonstrates how new development in the village sits within its countryside setting. Any additional development must be sympathetic to its countryside setting.</p> </div> <div data-bbox="689 711 1760 967" data-label="Image"> </div> <div data-bbox="689 967 1043 999" data-label="Caption"> <p>Corrected Map for Viewpoint 6</p> </div> <div data-bbox="689 1078 864 1110" data-label="Section-Header"> <p><b>Error at 'View 7'</b></p> </div> <div data-bbox="689 1110 1872 1142" data-label="Text"> <p>As with View 6, likewise Views 7 needs to be reappraised in view of the recent building out of as indicated.</p> </div> <div data-bbox="689 1182 954 1214" data-label="Text"> <p>View 7 is shown below:</p> </div>

Name	Organisation	Comments
		<div data-bbox="689 233 1240 699"> </div> <div data-bbox="1240 233 1742 699"> <p><b>View 7</b></p> <p>View east from Ashfield Road through the remaining undeveloped gap towards the open countryside.</p> <p>Development within this gap would result in the loss of this view to the open countryside setting of the village.</p> </div> <div data-bbox="689 699 1742 954"> </div> <p><b>View 7</b></p> <p>View 7 is no longer as is shown or ever will be such a view as is shown in the Appraisal of views document, as there is currently building work underway on that site under DC/18/04264, so the appraisal is out of date already. The current view from that viewpoint is shown below, as at June 2022, and therefore the text in relation to view 7 needs to be reconsidered or the view needs removing, since the view is not as important as suggested.</p>

Name	Organisation	Comments
		 <p data-bbox="689 986 969 1015">Viewpoint 7 at June 2022</p> <p data-bbox="689 1054 853 1083"><b>Error at View 9</b></p> <p data-bbox="689 1091 2002 1227">We also have concerns about the selection of view 9. When we compare the location of the 'protected view' with what the image shows and the description of the view, we concluded that the image provided is not taken from the point marked on the map. Rather, it has been taken from a more westerly point along Grove Lane. An accurate photo from the 'View 9' shown on the plan is shown below:</p>



Name	Organisation	Comments
		<div data-bbox="689 233 1653 579" data-label="Image"> </div> <p data-bbox="689 587 1594 651">           Accurate image for View 9            This is clearly a different view to the one provided in the accompanying appraisal:         </p> <div data-bbox="689 683 1164 1118" data-label="Image"> </div> <div data-bbox="1218 687 1675 724" data-label="Section-Header"> <p><b>View 9</b></p> </div> <div data-bbox="1218 724 1675 751" data-label="Text"> <p>View south-from Grove Lane towards village.</p> </div> <div data-bbox="1218 772 1675 890" data-label="Text"> <p>An extensive view south with Haughley Park on the horizon. Existing hedgerows help top screen the village from the countryside but additional development in the foreground or that breached the tree canopy would have a significant detrimental impact on the view.</p> </div> <div data-bbox="689 1118 1675 1342" data-label="Image"> </div> <p data-bbox="689 1347 1066 1372">View 9, as set out in the Appraisal</p>

Name	Organisation	Comments
		<p>It seems that the photograph is actually taken from the point shown on the image below, with a red dot:</p>  <p><b>View 9</b> View south from Grove Lane towards village. An extensive view south with Haughley Park on the horizon. Existing hedgerows help top screen the village from the countryside but additional development in the foreground or that breached the tree canopy would have a significant detrimental impact on the view.</p> <p>View 9 – location of view shown in photograph</p> <p>We consider that this view needs reassessing and amending.</p>
	Evolution Planning on behalf of Willow Walk Homes	<p>PLEASE SEE CHAPTER 4 OF THE ATTACHED REPORT. [Appended at the end of this Appendix]</p> <p>We have concerns about policy ELM 2, and more precisely, the supporting documentation, upon which it is based. It states:</p>

Name	Organisation	Comments
		<p>'Important views from public vantage points either within the built-up area or into or out of the surrounding countryside are identified on the Policies Map. Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Important Views.'</p> <p>This policy is accompanied by the identification of 9 'important views', including view 9 which looks toward our client's development site.</p> <p>We have concerns about the soundness of the supporting document which seeks to provide supporting evidence for this policy and justification as to why the views are considered as important.</p> <p>We are concerned that this supporting document provides an assessment which is flawed, since the document simply sets out the first 9 views which are identified as 'protected important views' and no methodology is set out as to why these views were selected. No rationale is provided for which views were assessed and other potential views which were not assessed.</p> <p>Moreover, 9 additional views were assessed and are included in the assessment at views 11 to 19, but there is no evidence submitted as to why views 1-9 were considered as important and why views 11-19 were not considered worthy of protection. No information is supplied as to who 'the receptors' of the views might be; how heavily footpaths are used, and what the sensitivity to change would be likely to be in these locations; and whether there would be opportunities for improvements in these views. There was no logic provided for which assessed views were then included and which assessed views were excluded. Overall, the background evidence is confusing and lacks any independent rationale.</p> <p><b>Error at View 9</b></p> <p>We also have concerns about the selection of view 9. When we compare the location of the 'protected view' with what the image shows and the description of the view, we concluded that the image provided is not taken from the point marked on the map. Rather, it has been taken from a more westerly point along Grove Lane. An accurate photo from the 'View 9' shown on the plan is shown below:</p>



Name	Organisation	Comments
		 <p data-bbox="689 608 963 639"><b>Accurate image for View 9</b></p> <p data-bbox="689 679 1951 746">This is clearly a different view to the one provided in the accompanying appraisal. It seems that the photograph is actually taken from the point shown on the image below, with a red dot:</p>

Name	Organisation	Comments
		<div data-bbox="696 236 1704 906" style="border: 1px solid black; padding: 5px;">  <div data-bbox="1234 236 1704 683" style="border: 1px solid black; padding: 5px;"> <p><b>View 9</b></p> <p>View south-from Grove Lane towards village.</p> <p>An extensive view south with Haughley Park on the horizon. Existing hedgerows help top screen the village from the countryside but additional development in the foreground or that breached the tree canopy would have a significant detrimental impact on the view.</p> </div>  </div> <p data-bbox="685 919 1211 951">View 9 – location of view shown in photograph</p> <p data-bbox="685 991 1357 1023">We consider that this view needs reassessing and amending.</p> <p data-bbox="685 1062 2018 1198">Either way, we have particular concerns about the description of view 9, which fails to take account of an approved scheme and the opportunity for mitigation. This view is described as ‘An extensive view south with Haughley Park on the horizon. Existing hedgerows help top screen the village from the countryside but additional development in the foreground or that breached the tree canopy would have a significant detrimental impact on the view.</p> <p data-bbox="685 1238 2018 1374">This assessment fails to take account of development which has been approved and the opportunities available to expand the screening to mitigate any future developments. We consider that the evidence base in respect of view 9 should be amended to reflect the fact that this view will be subject to change, and that opportunities exist for mitigation to continue to protect the view.</p>

Name	Organisation	Comments
		<p>We consider that the text should instead state:            'An extensive view south with Haughley Park on the horizon. Existing hedgerows help top screen the village from the countryside. <b>Additional development in the distance has been approved, and this can be successfully mitigated through the extension of existing screening.</b> Additional development in the foreground or that breached the tree canopy, <b>without mitigation</b>, could have a significant detrimental impact on the view.</p> <p>Summary            We consider that additional justification were provided to the evidence base. We also consider that view 9 needs to be checked for accuracy, since we consider that the view presented in the supporting documentation is not the same view as is identified on the Proposals Map. If the view put forward in the supporting documentation is the view which the Council wish to protect, then the text in relation to view 9 would need to be revised before this policy could be supported.</p> <p>We also consider that the policy ELM 2 should be amended to support the possibility of mitigation on visual impacts as follows:            'Important views from public vantage points either within the built-up area or into or out of the surrounding countryside are identified on the Policies Map. Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Important Views. <b>Opportunities to mitigation visual impact should be considered.</b>'</p> <p>Were these amendments incorporated, our client could support the policy.</p>
	James Bailey Planning on behalf of Taylor Wimpey Strategic	<p>Protection of Important Views            Taylor Wimpey have noted that there appears to be a slight inconsistency in terms of evidence and maps relating to one of the views in Policy ELM 2 - Protection of Important Views.</p> <p>View 6 in the Neighbourhood Plan Assessment of Important Views appears to be identified incorrectly. The vista icon is located on Elmswell FP 1, but the photo showing the view appears to be taken closer to the north-western boundary of Taylor Wimpey's land site off St. Edmunds Drive. It is also our opinion that the current wording of the policy is open to interpretation and does not provide the reader with clear and defined guidance. Therefore it is our opinion that the NP evidence currently being relied upon does not meet the basic conditions by contributing to sustainable development.</p>

Name	Organisation	Comments
		<p>There is not sufficient and proportionate evidence presented to guide development to sustainable solutions and assist a decision taker on what would or wouldn't be acceptable at this location, and what would be needed to avoid a detrimental visual impact as per the policy wording.</p>
	<p>James Bailey Planning on behalf of Taylor Wimpey Strategic</p>	<p>View 6 in the Neighbourhood Plan Assessment of Important Views appears to be identified incorrectly. The vista icon is located on Elmswell FP 1, but the photo showing the view appears to be taken closer to the north-western boundary of Taylor Wimpey's land site off St. Edmunds Drive. It is also our opinion that the wording of the policy is quite subjective, and the NP evidence currently being relied upon does not meet the basic conditions by contributing to sustainable development. There is not sufficient and proportionate evidence presented to guide development to sustainable solutions and assist a decision taker on what would or wouldn't be acceptable at this location, and what would be needed to avoid a detrimental visual impact as per the policy wording.</p> <p>Upon revision of view 6 and further provision of clear and proportionate evidence, TW would be willing to support the proposal.</p>
	<p>Richard Brown Planning on behalf of Christchurch Land &amp; Estates (Elmswell South) Limited</p>	<p>In relation to potential visual impact and with reference to the Elmswell Neighbourhood Plan: Appraisal of Important Views (April 2022), the proposed development area has taken into account and will respond to those identified views relevant to the site and its context (Views 1, 2 and 5). As such, it is considered that proposed development in the area indicated is capable of being accommodated within the landscape and will not have a significant or detrimental impact on the landscape setting of Elmswell.</p>
	<p>Suffolk County Council</p>	<p>Minerals and Waste Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means the County Council makes planning policy and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan (SMWLP), adopted in July 2020.</p> <p>The County Council has assessed the Elmswell neighbourhood plan regarding the safeguarding of potential minerals resources and operating minerals and waste facilities. SCC is concerned that the protected views policy is likely to have an impact on the allocated quarry extension in the Suffolk Minerals and Waste Local Plan, Policy MS8 Wetherden.</p> <p>It is thought that the protected views outlined in Policy ELM 2 may prejudice the quarry extension coming forward. Views 3 and 4 appears to overlook the existing quarry and the allocated extension to the quarry. This extension forms part of</p>

Name	Organisation	Comments
		<p>the strategy in Suffolk to provide sufficient supply of minerals for building materials, as required in paragraph 209 of the NPPF.</p> <p>Neighbourhood plans are examined against a set of basic conditions<sup>6</sup>, one of which is:  “e. the making of the order (or 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).”</p> <p>It is SCCs view that Policy ELM2 in its current form could prejudice the allocation in the adopted development plan for minerals and waste. Further comments from SCC’s landscape officer regarding this are as follows.</p> <p>View 3  The northern extension to Lawn Farm Quarry, Wetherden, as shown in the SMWLP, 2020, would potentially be perceptible at the periphery of the view (if not within the image itself, then, when travelling towards Elmswell from the south).</p> <p>However, the main concern for this view is that ‘unscreened development in the foreground or tall development above the tree canopy would have a significant detrimental impact on this view.’  The quarry extension would not interfere with the view to the edge of the village, which is the focus here.</p> <p>View 4  The recent industrial development towards the background of the view is insufficiently screened and a significant detracting element in this view.</p> <p>The current bunds of Lawn Farm Quarry are also visible to the left side of the image, but, in comparison, blend in better with the landscape and are therefore less detracting.</p> <p>The northern extension of the Lawn Farm Quarry, as shown in the SMWLP, would likely be outside the image of the view, but possibly perceptible, when travelling through the landscape. It is unlikely to detrimentally impact on the long-distance views, which are the focus for this view.</p> <p><i>Policy ELM 2 - Protection of Important Views</i>  The wording of the second sentence of this policy could be amended as follows to overcome the potential conflict with the SMWLP:</p>

Name	Organisation	Comments
		<p><del>Any</del> Proposed development which could affect these important views should provide a Landscape and Visual Impact Assessment and should not result in significant adverse visual impacts on the key elements of <del>should not have a</del> detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Important Views.</p> <p><i>Any land restored as a result of minerals development should be restored with respect to the identified qualities of the Important Views.</i></p> <p><i>Potential effects of Lawn Farm Quarry extension on Important views identified in Elmswell Neighbourhood Plan</i></p> <p>Whether or not both views and Policy ELM 2 remain unchanged, the effects of a potential extension to Lawn Farm Quarry on surrounding views should be assessed within the LVIA required for the extension application. It would be expected that LVIA viewpoints would assess views 3 and 4, if adopted, or select similar viewpoints to assess the potential visual effects of the proposal.</p> <p>Appropriate mitigation should form part of any extension to Lawn Farm Quarry in accordance with the SMWLP, 2020, which requires as part b) of its Policy MS8: Wetherden, which states:</p> <p><i>"Mitigation of landscape and visual impacts through a scheme of planting along the western flank of the existing quarry and proposed extension"</i></p> <p>The policy would be more robust if there was evidence showing how and why the views were identified, and why they are being protected. The assessment does contain numbers, titles, and descriptions for the views, as well as a brief explanation for the listing as an Important View. The numbers are not shown on the overall maps or the Policy Map and inserts.</p> <p>Views 11-19 contained in the appraisal document are remnants of an assessment of views for a different parish (appears to Kesgrave or Rushmere St Andrew) and should be deleted.</p> <p>In the context of important views, paragraph 3.8 recognises Landscape and Visual Impact Assessments (LVIA) as a recognised tool which would be considered in decision-making. This is however not anchored in any of the neighbourhood plan policies.</p> <p>The following wording is proposed to be added to Policy ELM2, to make the policy more robust:</p> <p><i>"A proportionate Landscape and Visual Impact Assessment (LVIA) will be required for any application."</i></p>



Name	Organisation	Comments
		For accuracy, the ' <i>and</i> ' should be included in "Landscape <i>and</i> visual Assessment (LVIA)" in paragraph 3.8.
	Mid Suffolk District Council	<p>View(s) on the east side of Ashfield Road?</p> <p>The Councils Heritage Team have put forward a number of suggestion. Some, for example, the idea of a 'local heritage list' are perhaps best left to a future modification of this plan, but the following may be worth considering now:</p> <ul style="list-style-type: none"> <li>• Boten Haugh Green (see: <a href="https://heritage.suffolk.gov.uk/Monument/MSF42828">https://heritage.suffolk.gov.uk/Monument/MSF42828</a> ) is a thin strip of the village common green that runs along the west edge of Ashfield Road, between the main road and a set of listed farmhouses (Willow Farmhouse, Green Farmhouse, Oak Farmhouse and Dagwood Farmhouse). This is a principal feature of the village, adding to its character. Perhaps including a viewpoint that takes in the road and the land would be suitable and would help raise awareness of this important historic landscape feature.</li> </ul> <p>Linked to the above, they also note and comment as follows:</p> <ul style="list-style-type: none"> <li>• Most of the identified protected views look out onto open countryside and do not take in any historic buildings or settings, therefore it would be inappropriate to comment on these. Our only take is that the viewpoint on Ashfield Road, looking towards the footpath running alongside the field south of Grove Lane [View 7] could be increased to 360° degrees to take in the green on the other side of the road.</li> </ul> <p>Any change would also require the Views Appraisal document to be updated accordingly.</p> <p><b>Appraisal of Views (April 2022)</b></p> <p>Others may comment on this too. The last five pages of this supporting document (pgs. 8 to 12) need deleting as the views shown are not relevant to Elmswell. <a href="http://elmswell.suffolk.cloud/assets/Neighbourhood-Plan/Elmswell-NP-Appraisal-of-Views-April-2022.pdf">http://elmswell.suffolk.cloud/assets/Neighbourhood-Plan/Elmswell-NP-Appraisal-of-Views-April-2022.pdf</a></p>
<p><b>Parish Council response:</b></p> <ul style="list-style-type: none"> <li>• The comments are noted.</li> <li>• The Appraisal of Views will be amended to delete pages 8 to 12.</li> <li>• It is believed that the view "up the hill away from Elmswell Hall" is not in Elmswell parish and cannot be covered in the Plan.</li> <li>• The evidence that supports the policy is considered proportionate and appropriate and has been used to support numerous made Neighbourhood Plans across the region.</li> <li>• Viewpoint 6 will be amended on the Policies Map to that identified by Evolution Planning</li> <li>• Viewpoint 9 will be amended on the Policies Map to a point further west on Grove Lane to correlate with the photograph in the Views Appraisal.</li> </ul>		

Name	Organisation	Comments
		<ul style="list-style-type: none"> <li>It is not considered that the policy would restrict the development of the Lawn Farm Quarry. The impact of the proposal on the surrounding landscape would have to be taken into account in any planning application and the identification of this view helps in such a consideration.</li> <li>In respect of the MSDC suggestion concerning Boten Haugh Green, it is important not to confuse the identification of views in respect of the landscape and the designation of heritage assets. The area referred to is generally screened by high hedges and, where these are not in place, the view is not extensive or worthy of identification.</li> <li>In respect of the suggestion by MSDC concerning View 7, there is no 360 degrees view at this point.</li> <li></li> </ul>
<b>Proposed changes</b>		
		<ul style="list-style-type: none"> <li>Delete pages 8-12 of Appraisal of Views document</li> <li>Amend the location of viewpoints 6 and 9.</li> </ul>
<b>Policy ELM 3 – Local Green Spaces</b>		
S Millyard	-	<p>I agree with all the green spaces shown but wish to add one more; the field to the South East of the bend in School Road. This is a popular and safe area for walking and exercise and makes a nice extension to the Maze area to the North of Church Road for dog walking and general exercise.</p> <p>I understand that Elmswell has acquired some land to the North &amp; East of The Blackbourne but no reference to this is on the plan under either Green Spaces or Sports &amp; Recreation. Can this space be added to show the full picture of village land for public use?</p>
B Whiddington	-	These are all existing green spaces. Be more creative in bringing more green spaces into the policy.
D Overman	N/A	Very important for these to be protected and increase some of these, eg from Luke's wood back towards Warren Lane.
S Mansel	-	I do support this policy, but it needs to include the large open space to the South of the Crest Nicholson site on Wetherden Road. This large parcel of open space was cited as one of the benefits of the development as it had good links with the public right of way network.
B Pyle	-	<p>Add fields between Pightle Close and School Road for all of the reasons identified in the draft neighbour plan ie:</p> <ol style="list-style-type: none"> <li>1. Close proximity to community it serves</li> <li>2. Special to local community - beautiful, high recreational value with walkers and families playing/picnicing, tranquillity, richness of wildlife - barn owls, bats, monkjack deer, woodpeckers</li> <li>3. Local in character</li> </ol>
A McGee	-	The policy is generally supported but please also include the open area off Church Road towards the site of the old school.

Name	Organisation	Comments
K Harvey	-	<p>The maps of Area 3 and 4 are incorrect. The Ecological Significance of various areas is given only a cursory comment or dismissed.</p> <p>e.g. The Green Cemetery (3) has a number of different Orchids growing there and has been planted with ornamental fruit trees.</p> <p>Lukeswood (4) contains a very large number of wild flowers including different orchid species and is the site of two regionally rare fungi species. There is a large orchard of different native fruit trees plus a pond area adjacent to nationally scarce Black Poplar trees.</p> <p>Hanover Court area (1) includes the recently recovered brickwork Maze now maintained after many years neglect.</p> <p>There are a number of other significant Green Spaces that are not mentioned. Kiln Meadow was one of the original areas managed by the Elmswild team and is home for a wide variety of plant species, contains a pond and has an area of established woodland.</p> <p>No mention is made of the Memorial Garden which is regarded by many as a small oasis of calm.</p>
J Tooke-Marchant	-	<p>Green spaces along Eastern Way should also be protected, as well as the land between School Lane and Hanover Court.</p> <p>Trees and areas on longer grass would enhance existing green areas further and limit temperatures during heat waves.</p>
J Spencer	-	<p>Several areas of value to the village have not been included: Town Field, Kiln Meadow, the church yard, Memorial Garden and other area at the library, St John's Mead, the open space between Pightle Close and School Road. If they are not included, they may not be protected in future.</p> <p>Under site details there should be more information, especially under Ecological Significance. There is much ecological information about Lukeswood, and also the site is used by the Forest School.</p> <p>Sites number 3 and 4 are erroneously mapped - a part of Lukeswood is put under 3. Cemetery, so the areas are wrong</p>
D Collins	Resident	<p>The Policy ELM 3 identifies a number of green spaces ie 2,3,5,6,7,8 that would not under any circumstances be considered for developing. Green space area 1 must be clarified as being the entire present green space up to School Lane. The policy is not bold enough to promote additional land be made available as green space for example the land opposite the Cooperative store at junction between School Lane and New Road. The Land to north of Old Bacon Factory and School Lane/Parnell Lane should also remain a green space.</p>
M Feeney	ElmsWild	<p>(1) Policy ELM3 excludes the important green/wildlife spaces Kiln Meadow, Town Field and the Memorial Garden for no good reason that we can see. All three sites meet the criteria for inclusion and should be included in the list.</p> <p>(2) These three sites are also missing from the Local Green Spaces Assessment despite the fact that the required information about all three is readily available. Inclusion would not require any major alteration or addition to the NP.</p> <p>(3)The Assessment contains serious inaccuracies in relation to sites 3 and 4, the Cemetery and Lukeswood. The maps and areas given for both sites are wrong: the southern part of Lukeswood is missing from its associated map and appears instead tacked on to the Green Cemetery. This also makes the areas wrong – it should be 2.63 Ha for Lukeswood and</p>

Name	Organisation	Comments
		<p>1.53 Ha for the Cemetery. These mistakes undermine the overall credibility and reliability of the NP and need urgent correction.</p> <p>(4) The information presented in the Assessment has been pared back to the extent that it lacks sufficient detail to establish a strong case for the designations, particularly in relation to the sections on Public access (no mention of PROWs, for instance), Ecological significance (no mention of important BAP and other species and habitats), and Historical significance (which applies notably to the missing sites of Town Field and the Memorial Garden as well as to Lukeswood).</p> <p>(5) Further general comments are made in section 6 below.</p>
H Spencer	-	<p>Policy ELM3 excludes the important green wildlife spaces Kiln Meadow, Town Field and the Memorial Garden for no good reason that I can see. All three sites meet the criteria for inclusion and should be included in the list.</p> <p>These three sites are also missing from the Local Green Spaces Assessment despite the fact that the required information about all three is readily available. Inclusion would not require any major iteration or addition to the NP.</p> <p>The Assessment contains serious inaccuracies in relation to sites 3 and 4, the Cemetery and Lukeswood. The maps and areas given for both sites are wrong: the southern part of Lukeswood is missing from its associated map and appears instead part of the Green Cemetery. This also makes the areas wrong - it should be 2.63 Ha for Lukeswood and 1.53 Ha for the Cemetery. These mistakes undermine the overall credibility and reliability of the NP and need urgent correction.</p> <p>The information presented in the Assessment has been pared back to the extent that it lacks sufficient detail to establish a strong case for the designations, particularly in relation to the sections on Public access, ecological significance and historical significance (which also applies notably to the missing sites of Town Field and the Memorial Garden as well as to Lukeswood).</p>
J Ibbetson	private and none official view of vice chair Elmswild	<p>Firstly, on the detailed plan the boundary between Lukeswood and the Green Cemetery are incorrect being several yards to far north of their true location. Further there are at least 2 major sites missing completely, that is Town Field and Kiln Meadow. There are also several minor sites, on the scale of the site labelled 5 on the the ELM3 map, at for instance Rowan Green, William Armstrong Close and Gardeners Walk.</p>
S&J Govier	-	<p>The fields behind School Road are also areas of recreation and flora fauna</p>
A Seabourne	-	<p>Yes but No. As house building invades the perimeter of that shown in the plan the distance the community has to walk to enjoy the benefits of a rural village becomes very restrictive - more land within the boundary should be purchased by the PC to replace that cost.</p>
K&J Craven	-	<p>Cannot have enough green spaces</p>

Name	Organisation	Comments
Anonymous		<p>(1) Policy ELM3 should include the important sites of Kiln Meadow, Town Field and the Memorial Garden. These sites meet all of the criteria for inclusion and we can see no good reason for their being excluded.</p> <p>(2) Kiln Meadow, Town Field and the Memorial Garden have also been left out of the Local Green Spaces Assessment. Restoring these sites would not entail a major alteration to the Plan and the information required is readily available. They must be included.</p> <p>(3) There are serious inaccuracies in the Assessment in relation to sites 3 and 4 (Green Cemetery and Lukeswood). Both the maps and the areas are wrong - the southern area of Lukeswood is shown as part of the green cemetery. This must be corrected if the NP is to have any credibility and reliability.</p> <p>(4) The Assessment has been pared down to the extent that it lacks sufficient detail to establish a strong case for making the designations, particularly in relation to the sections on public access (no mention of PROWs), ecological significance and historical significance.</p> <p>(5) We make further comments in section 6 below.</p>
Anonymous		Insufficient. What is the situation with the land opposite the Co-Op!
R Barber	Pegasus Group on behalf of Endurance Estates Strategic Land Ltd.	<p>3.8. Our client supports the approach detailed in Policy ELM 3 for the designation of Local Green Spaces (LGS) within Elmswell. The Framework sets out at Paragraph 101 that designation of land as LGS should be consistent with the sustainable development of the local area. Paragraph 102 goes on to set out the three tests that must be aligned with to enable designation of LGS, as follows:</p> <ul style="list-style-type: none"> <li>• In reasonably close proximity to the community it serves;</li> <li>• Demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</li> <li>• Local in character and is not an extensive tract of land.</li> </ul> <p>3.9. As evidenced within the NP a LGS Appraisal has been completed and only those green spaces which meet with the above criteria have been designated under Policy ELM3. The Policy is, therefore, consistent with the requirements of the Framework and meets with the conditions of Schedule 4b of the Town and Country Planning Act 1990 (as amended).</p>
	James Bailey Planning on behalf of Taylor Wimpey Strategic	<p>Open Spaces</p> <p>It can be seen from the Opportunities &amp; Constraints Plan that there are several green spaces identified across the site. These notably consist of tree lined avenues; new hedgerows; additional trees to be planted; or wildflower meadows. Much of these green spaces seek to enhance the existing rights of way across the site. However, there is also a large area of public open space to the western boundary of the site.</p>

Name	Organisation	Comments
		<p>The public open space to the west of the site serves a numbers of functions, including becoming a home to new: hedgerow and tree planting; wildflower meadow; attenuation features; and the Local Equipped Area of Play (LEAP). This green space will be an important part of the new development, and could also benefit the wider community given its links to the existing footpath connections.</p> <p>On this basis, there might be an opportunity for the Elmswell Neighbourhood Plan to identify the open space on the land off St. Edmunds Drive / Station Road as a new 'Local Green Space' on the Policies Map. This is something that Taylor Wimpey would be willing to consider and offer to the Neighbourhood Plan.</p>
	Suffolk County Council	<p>SCC welcomes the designated Local Green Space in Policy ELM 3 Local Green Spaces, shown on the Policies Map and in Appendix 1, as this supports the ongoing work to make Suffolk the Greenest County<sup>7</sup>.</p> <p>The Local Green Spaces Assessment document, April 2022, which can be found on the parish website, provides robust evidence, and is welcomed by SCC. Photos of the Local Green Spaces next to the location maps would have been a further benefit, to provide context to the reader.</p>
	Mid Suffolk District Council	<ul style="list-style-type: none"> <li>• Suggest also including a cross-reference to the maps in Appendix 1</li> <li>• Suggest a more consistent use of capital letters (Allotments, Church Hill, Amenity Open Spaces, Pightle Close, etc.)</li> </ul> <p>LG Space Assessment</p> <p>The 'Playing field off Thedwastre Close' entry states that the site is "<i>Accessible at all times to allotment holders</i>". Presumably, this should read "Accessible at all times."</p>
<p><b>Parish Council response:</b></p> <ul style="list-style-type: none"> <li>• The comments are noted.</li> <li>• The Local Green Space protection can only protect existing spaces that meet the criteria set out in the National Planning Policy Framework. This would exclude future spaces that have yet to be established.</li> <li>• It is not considered that the land opposite the Co-op meets the NPPF criteria.</li> <li>• It is not considered that Kiln Meadow meets the NPPF criteria.</li> <li>• The boundary between Lukes Wood and the Green Cemetery will be corrected.</li> </ul>		



Name	Organisation	Comments
<ul style="list-style-type: none"> <li>The land between The Pightle and School Road was recently subject to a petition in the village, supported by the Parish Council, to seek to establish a primary school. Until this is resolved it is not appropriate to designate the site as Local Green Space.</li> <li>Town Field is considered to meet the NPPF criteria and will be added to the Plan.</li> <li>It is not considered necessary to include photos of the LGS in the Assessment document.</li> <li>The Assessment is considered to contain sufficient information to support the designation of the proposed sites in the Plan.</li> <li>The grammatical corrections raised by MSDC will be made</li> <li>The policy will be amended to refer to the maps in Appendix 1.</li> </ul>		
<p><b>Proposed changes:</b></p> <ul style="list-style-type: none"> <li>Amend the boundary between Lukes Wood and the Green Cemetery</li> <li>Add Town Field to the Plan as Local Green Space and supporting Local Green Space Assessment</li> <li>The grammatical corrections raised by MSDC will be made</li> </ul>		
<p><b>Policy ELM 4 – Open Space, Sport and Recreation Facilities</b></p>		
S Mansel	-	I do support this policy. It mentions the quality of car parking facilities, but there is no mention of cycle storage or facilities for cyclists. These need to be included in this policy.
B Pyle	-	Please add the importance of open green space to all ages such as the fields in between Pightle Close and School Road. Since lock down, we have seen more and more walkers and dog owners using the fields to the point that there are now tracks worn into it. This is a popular exercise recreational area away from Blackbourne.
A Seabourne	-	Yes but No. But more should be done to link individual sites to support my point in 3 above
K&J Craven	-	Need as much space as possible for sports etc for people to exercise
	Pegasus Group on behalf of Endurance Estates Strategic Land Ltd.	<p>3.10. Our client supports the principles outlined in Policy ELM 4 for the provision, enhancement and/or expansion of sports/recreation open space and facilities for Elmswell. However, as contended in response to Question 1, the settlement boundary proposed at present does not provide sufficient land for the delivery of any new facilities or the expansion of those existing in the future.</p> <p>3.11. The text which accompanies Policy ELM 4 recognises the importance of sport and recreation provision for residents of all ages, yet the spatial strategy outlined in Policy ELM 1 does not provide sufficient flexibility for future delivery should</p>

Name	Organisation	Comments
		<p>it be required across the plan period. As such it is recommended that Policy ELM 1 is subject to further review, in order to better support the objectives of Policy ELM 4.</p> <p>3.12. Furthermore, it is queried as to why the Playing Fields located to the south of Grove Lane, have not been identified on the Policies Map? These fields are an important recreational facility used by the local community and should, therefore, be afforded the protection that Policy ELM4 provides. As such, it is recommended that the Policies Map be amended to incorporate these fields alongside those at Blackbourne Community Centre which have already been identified on the Map.</p>
	<p>Evolution Planning on behalf of Robert Dyball</p>	<p>PLEASE SEE CHAPTER 5 OF THE ATTACHED REPORT. [Appended at the end of this Appendix]</p> <p>This policy protects existing sport and recreation and supports the provision of new facilities. It includes strong support for the provision of new facilities as follows:</p> <p>'Where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate. These facilities will be secured through the use of conditions and/or planning obligations.'</p> <p>Since the Neighbourhood Plan is not allocating any sites for development, and instead is relying on the Local Plan, we are not clear as to why this policy is included.</p> <p>We consider that a policy supporting the provision of new community facilities should be paired with a positive development allocation able to generate the funds for the delivery of these required facilities. If the Neighbourhood Plan group consider that financial contributions are required towards the delivery of community facilities, then in order for this policy to be deliverable, the Neighbourhood Plan should provide allocations for new development. Without any allocations, this policy will be undeliverable and will rely on the development plan or windfall developments for delivery.</p> <p>Our client owns land which could provide a development opportunity and provide contributions towards community facilities. Suggested sites have been included at section 3 above. He recommends that these sites are included within the development boundary to enable delivery.</p>

Name	Organisation	Comments
	Evolution Planning on behalf of Willow Walk Homes	<p>PLEASE SEE CHAPTER 5 OF THE ATTACHED REPORT. [Appended at the end of this Appendix]</p> <p>This policy protects existing sport and recreation and supports the provision of new facilities. It includes strong support for the provision of new facilities as follows:</p> <p>'Where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate. These facilities will be secured through the use of conditions and/or planning obligations.'</p> <p>Since the Neighbourhood Plan is not allocating any sites for development, and instead is relying on the Local Plan, we are not clear as to why this policy is included.</p> <p>We consider that a policy supporting the provision of new community facilities should be paired with a positive development allocation able to generate the funds for the delivery of these required facilities. If the Neighbourhood Plan Group consider that financial contributions are required towards the delivery of community facilities, then in order for this policy to be deliverable, the Neighbourhood Plan should provide allocations for new development. Without any allocations, this policy will be undeliverable and will rely on the development plan or windfall developments for delivery.</p>
	Suffolk County Council	<p>Environment and recreation</p> <p>We suggest the inclusion to make open spaces and facilities accessible to residents with limited mobility (inclusion of benches, including Chatty Benches<sup>4</sup> and well-maintained paths etc), into Policy ELM4. This could help to make an elderly population feel more included as part of the community and reduce isolation of vulnerable groups.</p> <p>Public Health welcome the provision of designated Local Green Spaces, and the Open Space, Sport and Recreation Facilities in the Neighbourhood Plan. There are proven links<sup>5</sup> between access to green outdoor spaces and the improvements to physical wellbeing for the population as a whole, including better quality of life for the elderly, working age adults, and for children, through physical activity and increased opportunities of social engagement.</p> <p>Policy ELM4 Open Space, Sport and Recreation is a robust policy to support future and protect existing recreational and sports facilities in the village.</p>

Name	Organisation	Comments
		<p>The plan states that the focus is at the Blackbourne, which is assumed is the recreation ground shown on the Policies Map. Any other existing, smaller recreational or sports facilities are not mentioned in the plan or shown on the Policies Map. This is surprising, given the emphasis within Policy ELM4.</p> <p>Active Travel and Air Quality Public Health proposes to add text on Active Travel Plans to encourage walking and cycling on safe routes and well connected to amenities, and links to Elmswell Railway Station to reduce car usage. Active travel can have considerable health benefits on a population as well as reducing the burdens on the health service from conditions such as obesity. This should be considered and use of other modes of travel such as the importance of public transport and the needs of all users (i.e., older persons, disabled persons). We have made more comment on transport in the transport section below.</p> <p>The following addition is proposed to Policy ELM4 Open Space, Sport and Recreation: <i>Clubhouses, pavilions, car parking and ancillary facilities must be of a high standard of design and internal layout. The location of such facilities must be well related and sensitive to the topography, character and uses of the surrounding area, particularly when located in or close to residential areas, and should be easily accessible by pedestrians and cyclists, and include secure cycle storage space."</i></p> <p>Libraries SCC would suggest expanding the reference to community facilities in the village beyond sports and recreation. There is a need to relocate Elmswell Library which should be mentioned in the plan. Options for this are being explored. SCC is currently discussing options with the Friends of Elmswell Library. It is recommended that the Elmswell Neighbourhood Plan should state that there is support for provision of a new library facility in policy. The policy should also state that any new library should be in an accessible location.</p>
	Mid Suffolk District Council	We have no comment to make on this Policy.
<p><b>Parish Council response:</b></p> <ul style="list-style-type: none"> <li>• The Neighbourhood Plan does not need to allocate the additional sites suggested.</li> <li>• The fields in between Pightle Close and School Road are not formal recreational open space</li> <li>• The suggestions proposed by the County Council are not necessary in order to make the policy meet the Basic Conditions.</li> </ul>		
<p><b>Proposed changes:</b></p> <ul style="list-style-type: none"> <li>• None</li> </ul>		

Name	Organisation	Comments
<b>Policy ELM 5 - Employment Sites</b>		
-	-	More emphasis needs putting back on to building owners to ensure there use/actively trying or change in to residential rather than being left empty.
D Overman	N/A	Yes and we need more employment as we are increasing traffic flows out of the village.
C Curtis	-	As long as there are not too many of those huge warehouse developments as at the end of Warren Lane. It seem that as Felixstowe and Harwich expand there is a land grab for large warehouse facilities with their huge lorry traffic.
S Marsden	-	Already there are traffic problems with the industrial units on Grove lane. The flat be lorries are getting bigger and with more housing development and more industrial units outside the village boundary at the end of Warren lane. The traffic situation is little short of highly dangerous. Would support both of these sites if we had a relief road. Nothing mention in this document.
K&J Craven	-	Enough employment. Too many big lorries through the village, roads not suitable
R Arnold	-	please see comments below
R Barber	Pegasus Group on behalf of Endurance Estates Strategic Land Ltd.	3.13. Our client supports Policy ELM 5's objective to encourage the retention and development of existing and other business uses provided that they do not have a detrimental impact upon the surrounding area. However, as referenced throughout these representations Policy ELM 1 should be reviewed for the aforementioned reasons to ensure that the spatial strategy is flexible enough to support the aims of Policy ELM 5.
	Evolution Planning on behalf of Robert Dyball	<p>PLEASE SEE CHAPTER 6 OF THE ATTACHED REPORT.</p> <p>We support this policy which states that the 'retention and development of existing employment and other business uses, including those identified on the Policies Map, will be supported providing such proposals do not have a detrimental impact on the local landscape character (including important views identified on the Policies Map), designated heritage assets, residential amenity (including noise, light and air pollution, loss of privacy and overlooking) and the existing highway network.'</p> <p>We support the identification of both recognized employment areas, and consider that, in view of the level of housing development in and around Elmswell, the policy should be reworded to allow for the option to expand these employment sites, should the need arise. However on the inset North plan the area adjacent to East Wood should also be shown in blue as ELM 5, where K &amp; M tyres , Elm Valley Foods ,Natural Dog food Direct and Medallion Nets provide valuable employment.</p> <p>Section 6 of the NPPF encourages LPAs to build strong and competitive economies, which includes providing for employment opportunities in rural areas. Since Elmswell has been subject to growth, with recent housing development, it</p>

Name	Organisation	Comments
		<p>follows that the existing employment land uses identified in the Neighborhood Plan should also be permitted to expand if needed.</p> <p>As such, we consider that this policy would be strengthened, if it were revised to state:  'retention, development and expansion of existing employment and other business uses, including those identified on the Policies Map, will be supported providing such proposals do not have a detrimental impact on the local landscape character (including important views identified on the Policies Map), designated heritage assets, residential amenity (including noise, light and air pollution, loss of privacy and overlooking) and the existing highway network.'</p> <p>Allowing the existing employment areas to expand, subject to the conditions set out above, would be in accordance with the NPPF, which encourages planning policies to enable the development of diversification of rural businesses, and encourages sustainable economic development. By providing for new and expanded employment opportunities' in Elmswell, which is a Core Village, the Neighbourhood Plan will reduce the need to travel for residents seeking employment. As such, this would be in line with the presumption in favour of sustainable development and would demonstrate that the plan is 'positively prepared'.</p> <p>We support the clauses included in this policy which seek to protect landscape character, designated heritage assets, residential amenity (including noise, light and air pollution, loss of privacy and overlooking) and the existing highway network. By including these clauses, the Neighbourhood Plan could also expressly allow for the expansion, where appropriate, of the existing employment sites in the settlement. Since the economy is currently heading into a recession, it is considered that opportunities to support existing business and welcome inward investment to the settlement will be welcomed locally.</p>
	Mid Suffolk District Council	<p>ELM 5 - Employment Sites (criterion i)</p> <p>We previously stated that we had no comment to make on this policy other than to query why the small cluster of business premises to the north of Grove Lane had been excluded.</p> <p>It has now noted that ELM5(i) requires applicants to demonstrate that they have made 'genuine attempts' to sell / let the site or premises in its current use, and there is concern that the phrase will leave the policy open to wide interpretation and cause issues with its implementation. We are conscious too that the same wording has appeared in other neighbourhood plans, including some that have now been adopted. Our preference going forward is that such a requirement is more specific.</p>



Name	Organisation	Comments
		<p>While it has yet to be adopted, Joint Local Plan Policy LP31(3.a.) refers to a sustained marketing period of six months. There is also wording in, for example the first criteria in THN17 of the adopted Thorndon NP, that can be referred to.</p> <p>Taking all these factors into account we recommend that ELM5(i) should read as follows:  i. financial evidence can be provided that the site/premises has been marketed for sale/let for a minimum period of six months, and that it can be demonstrated that no suitable or viable alternative employment/business uses can be found or are likely to be found in the foreseeable future,</p> <p>Qstn: Was there a specific reason why the small cluster of business premises to the north of Grove Lane have been excluded?</p>
<p><b>Parish Council response:</b></p> <ul style="list-style-type: none"> <li>• The policy is explicit in the requirement that any employment development should not have a detrimental impact on the local landscape character, designated heritage assets, residential amenity and the existing highway network.</li> <li>• It is not considered that Policy ELM1 needs to be more flexible to support the aims of Policy ELM5.</li> <li>• It is not considered that the word “expansion” needs to be inserted into the policy in relation to existing employment sites as this would suggest that expansion into the countryside would be supported, which would not necessarily be in accordance with Policy ELM1 or the NPPF in terms of the sustainable location of development.</li> <li>• Criterion i. will be amended as suggested by Mid Suffolk DC but it is considered that marketing should be based on the current/last use</li> <li>• The policy applies to all employment premises but the Policies Map, in accordance with para 3.13, only identifies the concentration of employment uses.</li> </ul>		
<p><b>Proposed changes:</b></p> <ul style="list-style-type: none"> <li>• Amend criterion i. to take account of comments made by MSDC.</li> </ul>		
<p><b>General Comments</b></p>		
D Brown	-	It would be helpful if the higher tier authorities such as MSDC & SCC would actually take notice of the views of the village.
S Millyard	-	1 No mention of Footpaths in the plan. We enjoy the many interlinking footpaths around the village which offer a range of exercise and viewing options for able bodied and the not so agile. I assume these are protected rights of way but it would be sad to see them downgraded to pavements.

Name	Organisation	Comments
		<p>One particular footpath that is falling into disrepair is the path leading to Woolpit from the South end of Warren Lane, alongside the new blue warehouse, across the river and then over the A14. It is still signposted but the bridge over the river is unsafe. Crossing the A14 may not be ideal but it is quite safe if you wait for a lull in the traffic and I would say safer than walking over the bridge to Woolpit on the A1088 junction where there is no pavement.</p> <p>2 I am pleased to see a plan for the village development, I recognise why Elmswell is being developed with its rail links and infrastructure but lament the rapid pace and lack of school provision and doctors which are all under stress for longer term residents. I hope the plan will provide a framework within which development can be managed and not be overridden by Local Council or National dictates.</p>
J Welford	-	<p>No further developments of domestic housing stock EXCEPT "affordable housing for rent by local people only" until and unless infrastructure is improved within the village should be permitted either within or immediately outside the development area. Samples of this include the railway crossing, the junction between Church Road and School Road near the church. Improvement to the four-way junction at Church Road, Cross Street, Warren Lane, and New Road is urgently needed. A strictly applied and enforced speed limit of 30MPH should be set for Warren Lane. Proper well sited passing places should be set in place and the Road edges should be made good along this road which is used as a speedy entrance into the village</p>
T Garner	Elmswell cricket club	<p>Having served on the neighbourhood plan committee it's disappointing that the council has had to spend a lot of time, effort and money on a scheme that was never going to be allowed.</p>
B Whiddington	-	<ol style="list-style-type: none"> <li>1. No mention of a by-pass for the village.</li> <li>2. Insufficient school places for a village of this size.</li> <li>3. Why not plan for a pedestrian crossing at the railway level crossing?</li> <li>4. Why no mention of a walkway/cycle path between Elmswell and Woolpit? It is not possible to get to Woolpit without a car/bus. Not a very green policy in these current times!</li> <li>5. Create a plan for vehicle exhaust pollution at the level crossing - more signage to switch off engines. It is not healthy for pedestrians waiting to cross the line.</li> </ol>
A Whiddington	-	<p>There is no mention/provision for development, particularly housing and industrial, to be conditional on the building of a by-pass to the village. Traffic congestion, particularly at the level crossing, is already an issue without further development in the village.</p> <p>I understand that the local school is already full in terms of intake at the early years stage. How is the village meant to cope and create a "community" if children born or moving into the area cannot attend school here? There must be a plan to build another school or somehow extend the existing one.</p>

Name	Organisation	Comments
		<p>How will Woolpit Health Centre cope with an even larger population being within it's catchment area?</p> <p>As with any development, infrastructure, schools, shops and open spaces must be recognised as important and considered essential with any plans approved.</p>
D Overman	N/A	Need the bypass to get away from the railway crossing. This is becoming congested most days and it is only a matter of time when frustration will lead to an accident.
C Curtis	-	I am aware Elmswell is an access village but not enough consideration is given to the quality of life within the village for children and villagers - the pollution seems worse than in urban areas. There are huge numbers of lorries with no restrictions on their movements or speeds causing dangerous situations to arise. If we are an access village then surely there should be some mention of provision of a ring road especially with the expansion of the port areas.
C White	Great Ashfield Parish Council	<p>Very disappointed that there is no mention of infrastructure/road improvements, in particular at the level crossing, this is already a significant bottleneck and with additional development there will be more traffic through the village. There needs to be either a bypass or a flyover somewhere?</p> <p>There is also a problem with cars parked along the road leading up to the level crossing, the location of the nursery school etc.</p> <p>The crossroads at the Co-op is a problem at busy times, and School Road is dangerous given the size of some of the traffic using this road. This does not appear to be addressed anywhere in the plan?</p>
P Edmonds	-	We all recognise the need for further housing but infrastructure must be improved to keep pace with levels of population.
D Coe	-	<p>In respect of employment sites. It would (I feel) make sense for the more heavy and transport industries not to be permitted any further expansion to the NORTH of our level crossing, in an ideal world they, particularly the heavy transport companies, should be located to the SOUTH as is the case of those at Lawn Farm.</p> <p>It seems unlikely at this time with the current Housing expansion programme that any form of bye pass or relief road is in the offing and the voluntary one way circuit via School Road and New Road / Church Road could and should be formalised and properly signed as such.</p>
C Balcombe	-	i fully support the proposals for the draft neighbourhood plan, well thought out, let's hope it is passed in it's entirety
S Marsden	-	<p>No mention of a relief road. I fear the current development of the village is detrimental to the provision of this road. Infrastructure such as Schools Doctors surgeries are still required. The amount of HGV traffic in the village with its narrow footpaths is a hazard i have had to resort to climbing into a hedge on Station Road to allow a Wilson's HGV to pass as they had to mount the pavement! To accommodate all this development in the village a major scheme of footpath widening needs to be undertaken.</p>

Name	Organisation	Comments
B Pyle	-	Thank you for all of the hard work that has gone into drafting the plan. We would really appreciate it if our feedback can be incorporated into the plan for the reasons identified so as to protect this beautiful and popular part of the village. We see all ages enjoying the many benefits of the green space in between Pightle Close and School Road. Thank you.
P Shaw	-	Much overdue, and desperately needed. Absolute full, unequivocal support.
S Shaw	-	Total support for a much needed NP.
S Welford	-	I do NOT want to see any more further developments of domestic housing anywhere! I would like to see improvements re: the level crossing and also at the junction of Warren Lane, Church Road and Cross Street. Also improvements to School Lane which is far too narrow! Plus a 30 mph speed limit along Warren Lane.
J Rogers	-	This draft contains no policy that would require any development that takes place to have full regard for environmental consideration. Should there be an expectation that any development will require electric vehicle charging, although this will be covered in the Mid Suffolk Planning Policy. But also sustainable heating such as air or ground source heat pumps. Tee inclusion of PV cells in all new development should also be a priority. It should be written into the policy that there will be a presumption for these and that any development must show clear and justifiable reason for not having them included.
A McGee	-	Thank you for the work that has gone into this document. A concern is that the document does not say anything about the density of housing that will undoubtedly be put up in the coming years on agricultural land or in back gardens. Or of the consequent impact of increased numbers of adults and children who require local services, or of cars and vans that drive through the village. Is the Neighbourhood Plan a place where these issues might also be flagged up?
C Osborne	The Art Society West Suffolk	Please do not allow any more building of residential or business properties within the Parish of Elmswell . To do so would not only ruin the Core Village for old and new inhabitants, and make all public amenities in short supply, but it would become a town.
K Harvey	-	The map errors for the Cemetery and Lukeswood are repeated on the 'Inset South' map on P15 and also Appendix 1 of the Elmswell NP Public Consultation document.
J Spencer	-	It seems to rather scant on details, a lost opportunity to produce a longer, comprehensive document to do some real good. Please take the time to fill out the details and add the missing sites. Elmswild can supply ecological information.
D Collins	Resident	The plan does not mention proposals for schools/Dentist/Healthcare for a growing community. Woolpit is also seeing a huge housing expansion so this services are in need of expansion. The increase in vehicle and rail traffic and the consequential affect on railway crossing. There should also be some indication of encouraging additional retail outlets ie Tesco/Sainsbury express
M Feeney	ElmsWild	(1) None of the existing green spaces or wildlife conservation sites in Elmswell currently has any kind of official status or designation, leaving them vulnerable to encroachment, damage or even complete loss. (2) Listing and description in the NP offers a unique opportunity to provide official recognition and some protection for

Name	Organisation	Comments
		<p>green spaces that are valued by the community and which volunteers have worked hard to develop over many years. This is crucially important both locally and in the wider context of the biodiversity crisis that we are all now living through.</p> <p>(3) Access to nature is increasingly important for the growing local population. Suitable sites are next to impossible to secure – should we not do everything in our power to protect those sites that we do have?</p> <p>(4) Leaving out the three sites already referred to could be construed by outside parties as their not being valued by the community, which is far from the case, and will make it very difficult to argue for their protection in the future should the need arise. Trying to introduce them into a later iteration of the NP begs the question of why well-established existing sites were not included in the first place.</p> <p>(5) Relying on national or regional policies for protection of these sites is not an adequate or reliable alternative to inclusion in the NP and as an organisation we have no confidence in this suggestion. The three sites in question do not feature in the JLP. Biodiversity Net Gain does not offer a reliable means of protection while it contains so many loop-holes such as off-setting. For example, it can be argued that achieving BNG on a particular site is not possible and therefore that requirement can be fulfilled by the alternative means of making a contribution to a different site or project, which may be remote, inaccessible and completely unconnected to the community where the original site is located – small comfort to the community which may be losing its precious green space.</p> <p>(6) If as a community we do not take every opportunity to protect our valued wildlife and green spaces, we are sending out the message that we do not care about them and they are fair game.</p>
H Spencer	-	<p>Firstly, this neighbourhood plan is a pathetic effort. If you want an example of a strong neighbourhood plan I suggest you take a look at Godmanchester Neighbourhood Plan. See It is so well written that Huntingdon Town Council used it as a template for their effort.</p> <p>None of the existing green spaces or wildlife conservation sites in Elmswell currently has any kind of official status or designation, leaving them vulnerable to encroachment, damage or even complete loss.</p> <p>Listing and description in the plan offers a unique opportunity to provide official recognition and some protection for green spaces that are valued by the community and which volunteers have worked hard to develop over many years. This is crucially important both locally and in the wider context of the biodiversity crisis that we are all now living through.</p> <p>Access to nature is increasingly important for the growing local population, suitable sites are next to impossible to secure. We should do everything in our power to protect those sites that we do have. Leaving out the three sites already referred to would be construed by outside parties as their not being valued by the community, which is far from the case, and will make it very difficult to argue for their protection in the</p>

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		<p>future should the need arise. Trying to introduce them into a later iteration of the plan begs the question of why well established existing sites were not included in the first place.</p> <p>Relying on national or regional policies for protection of these sites is not an adequate or reliable alternative to inclusion in the plan.</p>
J Ibbetson	private and none official view of vice chair Elmswild	The plan is minimalist, and not fit for purpose.
A Hollings	-	There is no mention of cycle/footpaths for ease and safe access to Woolpit - Wetherden and Haughley Also no mention of much needed for 11 - 17yrs free facilities such as skate park - climbing walls etc,
D Hollings	-	Would like to have some mention of providing a pedestrian/cycle path between Elmswell and Woolpit to make pedestrian access safer at the cemetery
S&J Govier	-	Any further developments must take in consideration that infrastructure Roads (electric, gas) lighting. Noise levels will have an impact on the village. Traffic calming measures need to be adopted when improving School Road and other busy roads in the village. Noise and light pollution also comes from the railway line and A14 more screening would hep along with improving replacing the concrete road surface. Infrastructure needs to be considered for Schools. Surgeries and the Post Office needs to be open every day. As the population has increased this will/should encourage commercial growth/business premise, but schools, surgeries and other infrastructure should be in place before further building work commences / at the planning stage
A Seabourne	-	there is nothing that demonstrates an improvement above existing facilities to support the increase in housing in particular relief roads, medical facilities or the condition of current resources. 2,3, 4 & 5 do not appear to be improved to maintain the existing balance to village occupancy.
K&J Craven	-	The village has grown & still growing. We have lived here for 25 years and it has changed beyond recognition - too many houses. No supporting facilities like Doctors & Schools for the size of growth. Enough is enough.
R Arnold	-	I am a member of the Campaign to Protect Rural England, and feel strongly that all developments should cease. First, we must preserve our beautiful Suffolk landscape; and secondly, we must think very seriously about our future food security. All green spaces must be preserved, and used by farmers market gardens and allotments, apart from wildlife areas. We should be growing more food, not less. Perhaps ponds and wetland areas might be established, to provide a habitat for amphibians and other forms of biodiversity. (perhaps this has already been done. I am a member of the Suffolk Wildlife Trust.



Name	Organisation	Comments
D Harris & U Sousa		<p>As owners of Honeysuckle Farm house on Ashfield Road we are relatively unscathed except for the caveat "development is only allowed in certain circumstances".</p> <p>Caveats are onerous. Caveats permitted the destruction of a listed Milking Shed within our curtilage and the listed Piggery at Mulberry Farm, both initially illegal acts, pardoned later. The perpetrator of these acts owns the two fields forming the setting of our Listed property. On Appeal, The Secretary of State refused permission for more development here citing the effect building would have on the setting of ours and the three other farmhouses. However the owner of the land still insists he will build a house there.</p> <p>I have recently been in correspondence with Councillor Suzie Morley at Mid-Suffolk about more recognition of the historic importance of these farmhouses to Elmswell and Suffolk. It seems that in future the Parish will have more say about listed properties and thus this letter to you.</p> <p>You are in fact very supporting, its usually Mid-Suffolk who over ride local decisions! Is this to change? And how do you see the future for these four historic properties - two Medieval, two 12th century. They seem to be, apart from the Church and Bank House Elmswell's only reminder of an interesting past. Can we be protected from further development? Caveats are very troubling.</p> <p>Thank you for your support up to now.</p>
Anonymous		<p>(1) None of the green spaces/wildlife sites in Elmswell currently has any official status or designation and they are therefore vulnerable to encroachment or even complete loss.</p> <p>(2) The NP offers a unique opportunity to provide official designation and some protection to sites that are valued by the community and that volunteers have worked hard to develop over many years.</p> <p>(3) Excluding the 3 sites already referred to could be construed by outside parties as their not being valued by the community or containing anything worth protecting. It will be difficult to argue for their retention or protection as green spaces in the future if they do not feature in the NP. Trying to add them in a later iteration of the NP begs the question as to why well-established sites were not included in the first place and may be difficult to justify.</p> <p>(4) The sites in question do not feature in the JLP so there is no protection provided there.</p>

Name	Organisation	Comments
		<p>(5) National policies such as Biodiversity Net Gain do not offer a reliable means of protection while they allow loop-holes such as off-setting. For example, where it can be argued that BNG would be difficult to achieve on a site, it is possible to fulfil that obligation by contributing to another project or scheme which may be remote from and completely unconnected with the site in question - of little comfort to the community that may lose its precious green space.</p> <p>(6) If, as a community, we do not take every opportunity to protect our valued wildlife sites, we are sending a message that we do not care about them and they are fair game.</p>
	<p>Pegasus Group on behalf of Endurance Estates Strategic Land Ltd.</p>	<p>1. Introduction</p> <p>1.1. These representations to the submission Elmswell Neighbourhood Plan (Regulation 14) (hereafter referred to as 'the NP') are made by Pegasus Group on behalf of Endurance Estates Strategic Land Ltd. (EESL). EESL has been in discussions with Elmswell Parish Council in respect of "Land East of Eastern Way" (hereafter referred to as 'the Site') and its potential for delivering residential development and land for a primary school; please refer to the Promoter Document included at Appendix 1 for full details of the Site.</p> <p>1.2. The Site presented covers an area of approximately 12.5ha and is suitable for a range of uses, those proposed include:</p> <ul style="list-style-type: none"> <li>• Residential development of up to 170 dwellings (developable area of 5.6ha), of different sizes, types and tenures, including affordable housing;</li> <li>• 2.4ha of land capable of delivering a two-form entry primary school (with an additional 0.6ha of land set aside for future expansion should it be necessary);</li> <li>• Public open space including dedicated play spaces, informal landscaped areas, landscape buffers around the edges of the Site, and Sustainable Drainage Systems;</li> <li>• Associated vehicular and pedestrian accesses and other infrastructure.</li> </ul> <p>1.3. The Site promoted by our client offers a sustainable and deliverable solution to increasing primary education infrastructure in the village to support the housing growth identified in the Babergh and Mid Suffolk Joint Local Plan. It would also future proof the ability of the village to support any further growth within and beyond the plan period.</p> <p>1.4. EESL welcomes this formal consultation on the submission version of Elmswell Neighbourhood Plan and would like to commend the Parish Council for their work on the NP. We would like to confirm our client's support for the emerging</p>

Name	Organisation	Comments
		<p>NP, but also take the opportunity to comment where it is considered that changes are required to ensure a more robust document that covers the plan period.</p> <p>2. Legal Requirements and Planning Policy</p> <p>Legal Requirements</p> <p>2.1. These representations are framed in the context of the Basic Conditions relevant to the preparation of a Neighbourhood Plan as set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended), as follows:</p> <ul style="list-style-type: none"> <li>• Having regard to national policies and advice contained in guidance issued by the Secretary of State;</li> <li>• Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses;</li> <li>• Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;</li> <li>• Contributing to the achievement of sustainable development;</li> <li>• General conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);</li> <li>• Does not breach, and is otherwise compatible with retained EU obligations; and</li> <li>• Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.</li> </ul> <p>National Planning Policy Framework</p> <p>2.2. The National Planning Policy Framework (the Framework) sets out the Government's expectations of plan-making and decision-taking in a way that achieves sustainable development and delivers positive growth (see Ministerial forewords).</p> <p>2.3. It emphasises the need to secure economic, social and environmental benefits, and at its core is the presumption in favour of sustainable development. It details the requirements for the preparation of neighbourhood plans to be in alignment with the strategic objectives of the wider area and the role which they play in the achievement of sustainable development.</p> <p>Adopted Development Plan</p>


Name	Organisation	Comments
		<p>2.4. In order to meet the aforementioned Basic Conditions and criteria set out within the Framework, neighbourhood plans should be prepared in alignment with the overarching strategic policies detailed within the Adopted Development Plan.</p> <p>2.5. The Adopted Development Plan relevant to the preparation of the Elmswell NP includes the following documents:</p> <ul style="list-style-type: none"> <li>• Mid Suffolk Core Strategy (adopted 2008) and subsequent Focused Review (adopted 2012);</li> <li>• Mid Suffolk Local Plan (adopted 1998) – strategic policies are superseded by the Core Strategy, but development management policies remain in force.</li> </ul> <p>Emerging Development Plan</p> <p>2.6. Mid Suffolk District Council and Babergh District Council (BMSDC) are preparing a joint Local Plan (JLP). The emerging JLP proposes to designate Elmswell as a Core Village. Following the suspension of the JLP examination hearings in October 2021, the Inspectors wrote to the Council outlining their concerns regarding the soundness of the Plan and its associated evidence base. The Inspectors expressed concerns over several matters which included the site appraisal and selection process, the spatial strategy for the distribution of development and the Sustainability Appraisal process. To remedy the significant flaws in the JLP the Inspectors recommended that this be converted into a Part 1 Plan, which contains strategic policies only and to prepare a Part 2 which would then come forward to allocate development sites and distribute development across the two districts.</p> <p>2.7. An exploratory meeting between the Planning Inspectors and Council Officers was held on the 16th December 2021. At this meeting the Council agreed, in principle, to take onboard the recommendations of the Inspectors and will now proceed with work to modify the JLP so that it becomes a Part 1 Plan only.</p> <p>2.8. An updated Local Development Scheme is yet to published and an anticipated date for adoption of either part of the JLP is, therefore, not yet confirmed.</p> <p>3. Review of the Elmswell Neighbourhood Plan</p> <p>3.1. These representations are made to the current consultation (11th May - 1st July 2022) on the pre-submission version of the Elmswell NP under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.</p>

Name	Organisation	Comments
		<p>3.2. This section highlights the key issues that EESL wishes to raise and seeks to provide recommendations for ensuring that the NP fully complies with the requirements of national policy. For ease of reference, the following reflects the structure of the accompanying Consultation Response Form.</p> <p>3.14. Whilst Policy ELM 4 covers proposals for the protection and enhancement of open space, sports and recreation facilities, there is limited reference to other necessary community facilities/services which are required to ensure that growth within the village remains sustainable or that these facilities/services should be maintained and/or enhanced for the benefit of residents in the longer term.</p> <p>3.15. In addition, there is a recognised lack of primary school capacity in Elmswell at present and the NP does not seek to address this. Work is currently underway to expand the existing primary school from 315 to 420 pupil places, providing two-form entry from September 2022. Nonetheless, whilst this expansion will assist in the short term, it will accommodate growth from just four of the five proposed residential allocations identified within the JLP. As the school site measures only 1.85ha in area and is constrained by existing development on all sides, there is no potential for further growth beyond that which has already been committed. Suffolk County Council and BMSDC propose that the remaining growth be accommodated at the new primary school in Woolpit. It is, however, understood that securing provision outside of Elmswell is not supported by local residents. BMSDC's Infrastructure Delivery Plan (IDP) states that a new A14 bridge/link will be delivered to provide safe access to this new school from Elmswell. The IDP, however, confirms that there is an unknown funding shortfall for this project and therefore its delivery must remain in doubt. In the absence of a safe pedestrian/cycle route and the journey distance, it is likely that car use will dominate. Hence, it is considered that the Councils' solution as proposed, would promote unsustainable travel patterns contrary to the objectives of national policy.</p> <p>3.16. The most sustainable solution to increasing primary education capacity in Elmswell is to deliver a new primary school within the village. Land East of Eastern Way provides this opportunity with sufficient space for the allocation of land for the delivery of a school. Initial layout testing shows that the Site would be able to accommodate a two-form entry primary school (circa 2.4ha), with a further 0.6ha of land available to allow for any future expansion. In addition, there would be sufficient space to deliver dedicated areas for parking within the Site, which the existing primary school is not able to provide, resulting in unsafe on road parking during drop-off and pick-up times.</p>

Name	Organisation	Comments
		<p>3.17. The western boundary of the Site is approximately 1km (or a ten-minute walk) from the majority of key services within the village including the existing school, shop, post office and railway station. The proposed location of the school would mean that the facility would be well located for existing residents with easy access for both pedestrians and cyclists; thereby integrating the school into the community and aiding social cohesion within the village, in alignment with the Framework's objective of promoting healthy and safe communities (Chapter 8). Furthermore, the provision of these safe pedestrian and cycle routes would reduce any potential traffic impact. In addition, the location of the Site to the south of the railway line would limit the impact upon the level crossing and possible congestion in the centre of the village. It is, therefore, considered that the Site would offer an easily accessible, deliverable and positive solution to school provision in Elmswell.</p> <p>3.18. The capacity of education infrastructure is a vital consideration for any growing community and the NP provides the opportunity to allocate land for the delivery of such a facility. As such, the Parish Council should consider either amending the settlement boundary to incorporate additional land within the village envelope or to adjust the wording of Policy ELM 1 such that there is the potential for development to come forward outside of the defined boundary, adjacent to the settlement where new community facilities could be delivered. Our client would be happy to discuss further this issue with the Parish Council, to ascertain whether they can assist in ensuring Elmswell has the necessary education infrastructure across the plan period.</p> <p>4. Summary and Conclusion</p> <p>4.1. Whilst EESL supports many of the aims of the policies in principle, it is considered that modifications to the NP should be incorporated to ensure that the plan is fit for purpose and flexible enough to react positively to changes that may occur over the plan period. The settlement boundary is drawn tightly around the village envelope and the current wording of Policy ELM 1 does not allow for development beyond the defined boundary, other than where national and district level strategic policies permit. Yet as detailed in these representations there is an identified need for additional education infrastructure and the NP in its current form does not facilitate this by providing space for the delivery of this use or, indeed, other community facilities, which may be required to ensure the sustainable growth of the village. As contended above, inclusion of 'Land East of Eastern Way' within the settlement boundary would safeguard a site in a highly sustainable location, offering a positive and future proofed solution to primary education capacity issues within the village.</p>



Name	Organisation	Comments
		<p>4.2. Whilst in general conformity with the objectives of national policy the NP arguably at present does not meet with the Framework's overarching aim to ensure sustainable development. As such, it is considered that the NP does not meet all the Basic Conditions of Schedule 4B of the Town and Country Planning Act 1990. It is, therefore, recommended that the Parish Council review the proposed spatial/planning strategy to provide greater flexibility and scope for development to come forward in the plan period which meets with local community needs, addressing the social, economic and environmental elements of sustainable development detailed at paragraph 8 of the Framework.</p>
	<p>James Bailey Planning Ltd. On behalf of JD and RJ Baker Farms Ltd</p>	<p>I am writing on behalf of JD and RJ Baker Farms Ltd. as the landowner of the current Outline planning application on land to the east of Warren Lane and west of Cresmedow Way (ref: DC/21/02956).</p> <p>We are writing to register our support for the draft Elmswell Neighbourhood Plan, and we would like this letter to be considered alongside the Comments Form we have also submitted to this Regulation 14 consultation period.</p> <p>It is considered that the Steering Group and the Parish Council have taken a very positive and proactive approach in the preparation of this stage of their Neighbourhood Plan. The overall document is of a manageable size, being based around five clear and direct policies.</p> <p>This streamlined approach is in line with national planning advice, and will provide clear guidance to local residents, Mid Suffolk District Council, Suffolk County Council, and any future developers.</p> <p>We are pleased to see that the Neighbourhood Plan has sought to redraw the settlement boundary for Elmswell. Including acknowledged sites with a positive planning history, is a very sensible way forward, and provides certainty for all over the next few years.</p> <p>The areas the Neighbourhood Plan has identified for growth, will deliver a variety of homes and infrastructure to the village. At the same time, having a 'Made' Neighbourhood Plan will also ensure that the community receives increased CIL monies from future developments, which will continue to benefit the village and its residents.</p> <p>The policy ELM1 identifies the new Settlement Boundary for Elmswell, which includes the JD and RJ Baker Farms Ltd. land off Warren Lane and Cresmedow Way. This approach follows the Joint Local Plan policy LA063, which proposed to allocate the site and also proposed to redraw the settlement boundary for Elmswell. This site had the benefit of Outline planning permission for 38 dwellings on a 1.86ha site, and included 35% affordable homes, with associated vehicular and pedestrian accesses and links (ref: 4909/16). It should be noted that the site also proposed and would bring forward improvements to highway safety at the Warren Lane/Church Road crossroads and passing bays on Warren Lane that required land within the control of the applicant. Permissive rights of way under a legal obligation would also be provided to connect to the existing PROW network on the south side of Elmswell, linking different housing parcels and areas of public open space. Such creation of recreation routes would benefit residents of the village and is shown below.</p>

Name	Organisation	Comments
		 <p data-bbox="685 874 2002 938">Map showing proposed footpath connections being offered should the settlement boundary be revised to include the 44 dwelling scheme.</p> <p data-bbox="685 979 1966 1082">A further improved Outline planning application has since been submitted to the Mid Suffolk District Council for consideration (ref: DC/21/02956). This is for 44 dwellings on a 2.88ha site, and now includes: bungalows; affordable housing; open space; landscaping; highways improvements; permissive rights of way and associated infrastructure.</p> <p data-bbox="685 1123 2033 1225">The proposed area for the current application on land to the east of Warren Lane and west of Cresmedow Way is slightly larger than the previously approved development and that shown in the Policies Map of the draft Neighbourhood Plan. See plans below:</p>

Name	Organisation	Comments
		<div data-bbox="689 236 1424 614" data-label="Image"> <p>The image contains three side-by-side site plan diagrams. The first diagram on the left is titled 'Previous Approval 4909/16 Granted 21/06/2018 (outline with access)' and shows a site boundary in red. The middle diagram is titled 'Current Application DC/21/02956 (outline with access)' and shows a larger site boundary in red, with the area between the two boundaries highlighted in green. The third diagram on the right is titled 'Allocation JLP (Reg 19 Latest under review)' and shows a site boundary in red with a yellow star in the center and the label 'LA063' below it.</p> </div> <p data-bbox="689 624 1003 647">Different site area proposals</p> <p data-bbox="689 655 1995 719">The current application (ref: DC/21/02956), shown highlighted green in the centre above, has many benefits which are summarised as below:</p> <ul data-bbox="689 727 2029 1370" style="list-style-type: none"> <li data-bbox="689 727 2007 831">• It provides a more rural and organic layout due to the larger site area for only 6 additional dwellings. This gives a much lower dwelling per hectare ratio of 15.28, rather than 20.43 in the previous scheme or that proposed through the JLP allocation.</li> <li data-bbox="689 839 1989 903">• The sustainable drainage scheme being proposed for the current 44 dwelling application has also been improved upon.</li> <li data-bbox="689 911 1989 975">• The scheme generates 15 affordable houses, which is two more than the previous proposal / allocation, which is a benefit to meet local housing need.</li> <li data-bbox="689 983 2029 1054">• A series of passing places along Warren Lane are proposed, which will alleviate existing highway concerns, along with other highways improvements proposed.</li> <li data-bbox="689 1062 2029 1214">• This scheme continues to offer the opportunity to provide more formalised connections to the wider footpath network to the south of Elmswell as highlighted above. This would include connections into FP20, areas of public open space within existing and new developments to the south of the village, as well as connections to Warren Lane and Cresmedow Way.</li> <li data-bbox="689 1222 2029 1326">• The additional land compared to the previous permitted scheme allows for a better layout and design. Importantly, it moves the proposed buildings further away from the existing housing that adjoins the site, which reduces any impact on amenity space, whilst also increasing open space provision within the site.</li> <li data-bbox="689 1334 1771 1370">• The proposal for 44 units does not extend past the woodland copse on the eastern boundary.</li> </ul>

Name	Organisation	Comments
		<ul style="list-style-type: none"> <li>There will be an improved landscape setting as evidenced within the submitted LVIA. It should also be noted this is consistent with landscape advice set out in the evidence base supporting the emerging Joint Local Plan and is not disputed by any new evidence to the contrary.</li> </ul> <p>The previously approved development for 38 dwellings extended into the countryside and was considered to have an acceptable landscape impact to those existing properties visible along Warren Close. It is acknowledged that the revised scheme does extend slightly further, but as explained, there is a far greater opportunity for landscaping with this additional land, with the proposed 44 dwellings being set back by a significant landscape buffer.</p> <p>Due to these planning considerations, which will deliver an improved scheme, it is therefore requested that the revised site area matches the planning application red line boundary and is incorporated into the Neighbourhood Plan proposed Settlement Boundary for ELM1.</p> <p>In conclusion, JD and RJ Baker Farms Ltd wish to support the Elmswell Neighbourhood Plan, but request the settlement boundary is amended slightly to incorporate application DC/21/02956. Associated with this revision, the landowner is willing to formalise footpaths and connections, such as the current permissive path from FP20 to Cresmedow Way and Warren Lane, that could otherwise be a missed opportunity. We would suggest that in addition to amending the settlement boundary, these links could also be added to the Policies Map to show the future position with respect to connectivity and access.</p> <p>If the Parish Council or Steering Group should require any further information on our submissions, then we will be more than happy to assist.</p> <p>We look forward to seeing the Submission version (Stage 16) in due course and ultimately being 'made' as part of the Development Plan for the area.</p> <p><b>Comments From comments on behalf of JD and RJ Baker Farms Ltd:</b></p> <p>The proactive direction of the Elmswell Neighbourhood Plan by the Parish Council in redrawing the settlement boundary to include "Development Sites with planning permission or recently constructed" is to be commended. Not only is this a sensible approach but by incorporate planning consents that Elmswell has already received over the last few years, which are fixed, it helpfully shows the community how their village will change in the future. This growth will deliver much needed housing locally and for the area, including affordable homes, to the village, as well as increasing CIL receipts to</p>


Name	Organisation	Comments
		<p>25% (instead of 15%) once the Neighbourhood Plan is 'Made', which will be passed to the Parish Council to spend locally.</p> <p>The policy ELM1 identifies the new settlement boundary for Elmswell, which includes land within the ownership of JD and RJ Baker Farms Ltd, east of Warren Lane and west of Cresmedow Way and reflects a recent planning permission and a site that is subject of new application which offers improvement. The approach in the Neighbourhood Plan follows the Joint Local Plan policy LA063 which proposed to allocate the site and redraw the settlement boundary as per the previous permission. This differs slightly to the new proposal and it is therefore requested that the revised site area matches the red line boundary for planning application ref: DC/21/02956, and is incorporated into the Neighbourhood Plan settlement boundary.</p> <p>The previous planning permission included an obligation on the development to bring forward permissive rights of way that will allow connections to be made between Warren Lane and existing PROW linking and forming circular walks to the south of the village. This allows residents to make more use of the open countryside to the south and connects public open space within the proposed allocations. The revised planning application continues this approach alongside other benefits the site brings forward including passing bays on Warren Lane, improvements to safety at the Warren Lane/Church Road crossroads.</p> <p>The amendments to the Settlement Boundary would also enable footpaths links and connections to be formalised, including the current permissive path that runs from FP20 to Cresmedow Way and Warren Lane as shown on the plan attached to the covering letter, which could otherwise represent a missed opportunity for the improvements to the south of the village. The Policies Map could also be revised to show these links if the larger site was included with the settlement boundary. It is considered that updating the Settlement Boundary and revising the Policies Map will further strengthen the Elmswell Neighbourhood Plan.</p> <p>We consider the Policies Map could also be revised to show these links to represent the future position if the larger site was included with the settlement boundary. It is considered that updating the Settlement Boundary and revising the Policies Map will further strengthen the Elmswell Neighbourhood Plan.</p>
	James Bailey Planning Ltd. on behalf of Bloor Homes	I am writing on behalf of Bloor Homes Eastern, as the developer of the current Reserved Matters application relating to land to the north and west of School Road, Elmswell (ref: DC/22/01615).

Name	Organisation	Comments
		<p>We are writing to register our support for the draft Elmswell Neighbourhood Plan, and we would like this letter to be considered along side the Comments Form we have also submitted to this Regulation 14 consultation period.</p> <p>It is considered that the Steering Group and the Parish Council have taken a positive and proactive approach in the preparation of this stage of their Neighbourhood Plan. This is highlighted by the short and concise nature of the overall document, with the five policies being direct and 'to the point'. As professional planners, this is seen as being an exceedingly helpful approach, which will provide developers, the District Council, and above all the local community, with certainty for the planned growth of the village, as well as identifying green spaces for protection and areas of importance.</p> <p>All involved are commended for the preparation of such a streamlined document, which is felt to be in accordance with the NPPF and Government advice.</p> <p>It may be worth incorporating important infrastructure, such as the Elmswell-Woolpit footpath and cycleway, within the Neighbourhood Plan. Although it is referenced in the site specific policies, and is also mentioned in the supporting Infrastructure Delivery Plan evidence, it does not currently feature within the emerging Babergh Mid Suffolk Joint Local Plan as an individual, specific policy. This would certainly be considered a localised issue, and therefore worthy of being included in a Neighbourhood Plan, and may assist in providing certainty for its delivery.</p> <p>In conclusion, Bloor Homes Eastern wish to support the Elmswell Neighbourhood Plan, and we look forward to it being submitted to the District Council and ultimately being made part of the Development Plan for the area.</p> <p>If the Parish Council or Steering Group should require any further information on our submissions, then we will be more than happy to assist.</p> <p>We look forward to seeing the Submission version (Stage 16) in due course.</p> <p><b>Comments Form Comments</b></p> <p>The proactive direction the Elmswell Neighbourhood Plan steering group and Parish Council have taken by redrawing the settlement boundary to include "Development Sites with planning permission or recently constructed" is to be commended. Not only is this sensible to incorporate the planning consents that Elmswell has already received over the</p>



Name	Organisation	Comments
		<p>last few years which is fixed, it helpfully shows the community how their village will change in the future. This growth will deliver much needed housing, including affordable homes, to the village, as well as increasing CIL receipts to 25% (instead of 15%) once the Neighbourhood Plan is 'Made', which will be passed to the Parish Council to spend locally.</p> <p>The ELM1 Settlement Boundary includes the Bloor Homes Eastern site for Reserved Matters planning application (DC/22/01615) for 86 dwellings (30 affordable units), including landscaping, early years provision, open space and highways improvements such as road widening and the provision of some of the cycle/footpath link between the villages of Elmswell and Woolpit.</p> <p>A suggested modification is for the route of the proposed Elmswell and Woolpit cycle/footpath to be identified within the draft Neighbourhood Plan on the Policies Map, which the above planning application is delivering a significant part of.</p> <p>Finally, Bloor Homes Eastern supports the Neighbourhood Plan and we look forward to it being submitted to the District Council and ultimately being made part of the Development Plan.</p>
	James Bailey Planning on behalf of Taylor Wimpey Strategic	<p>Comments Form General Comments</p> <p>The proactive direction the Elmswell Neighbourhood Plan steering group and Parish Council have taken by redrawing the settlement boundary to include "Development Sites with planning permission or recently constructed" is to be commended. Not only is this sensible to incorporate the planning consents that Elmswell has already received over the last few years which is fixed, it helpfully shows the community how their village will change in the future. This growth will deliver much needed housing, including affordable homes, to the village, as well as increasing CIL receipts to 25% (instead of 15%) once the Neighbourhood Plan is 'Made', which will be passed to the Parish Council to spend locally.</p> <p>The ELM1 Settlement Boundary includes the Taylor Wimpey Strategic Land site off St. Edmunds Drive / Station Road for 100 dwellings. Taylor Wimpey endorses this approach, and their sites inclusion within the future settlement boundary, as they very much see their site as being part of the village, given its location within Elmswell and its proximity to their existing adjacent Kingsbrook site.</p>

Name	Organisation	Comments
		<p>View 6 in the Neighbourhood Plan Assessment of Important Views seems to be identified incorrectly, and further clarity is necessary to guide development to sustainable solutions (i.e. what would or wouldn't be acceptable at this location to avoid a detrimental visual impact as per the policy wording).</p> <p>It can be seen from the Opportunities &amp; Constraints Plan that there are several green spaces identified across the site. These notably consist of tree lined avenues; new hedgerows; additional trees to be planted; or wildflower meadows. The public open space to the west of the site serves a number of functions, including becoming a home to new: hedgerow and tree planting; wildflower meadow; attenuation features; and the Local Equipped Area of Play (LEAP). On this basis, there might be an opportunity for the Elmswell Neighbourhood Plan to identify the open space on the land off St. Edmunds Drive / Station Road as a new 'Local Green Space' on the Policies Map.</p> <p>Finally, Taylor Wimpey Strategic Land supports the Neighbourhood Plan and we look forward to it being submitted to the District Council and ultimately being made part of the Development Plan.</p>
	James Bailey Planning on behalf of Taylor Wimpey Strategic	<p>Taylor Wimpey is keen to extend their support for the Elmswell Neighbourhood Plan, and for ELM1. Taylor Wimpey request further consideration is given to the Assessment of Important Views supporting Policy ELM 2 - Protection of Important Views. Upon revision of view 6 and further provision of clear and proportionate evidence, TW would be willing to support the proposal. Lastly, Taylor Wimpey would like to offer the green space on the western boundary of their site for consideration of a further potential new 'Local Green Space' under Policy ELM3.</p> <p>Please let us know if any further information should be required at this stage. In the meantime, we look forward to continuing to work with the local community towards the next stage of the Neighbourhood Plan, and we look forward to seeing the Submission version (Stage 16) in due course.</p>
	Richard Brown Planning on behalf of Christchurch Land & Estates (Elmswell South) Limited	Please see attached representations [Appended to the end of this Appendix] and drawing confirming the potential allocation at School Road Elmswell (the land adjoins the settlement boundary).

Name	Organisation	Comments				
		 <p data-bbox="712 1114 763 1129"><b>LEGEND</b></p> <table border="0" data-bbox="712 1134 1086 1193"> <tr> <td data-bbox="712 1134 869 1155">Application boundary (TBC) 0.00 hectares / 0.00 acres</td> <td data-bbox="913 1134 1086 1155">Potential development envelope 0.00 hectares / 0.00 acres</td> </tr> <tr> <td data-bbox="712 1166 869 1187">Other land in applicants control (TBC) 0.00 hectares / 0.00 acres</td> <td data-bbox="913 1166 1025 1187">Potential access</td> </tr> </table> <p data-bbox="712 1254 797 1270">Expertly Done.</p> <p data-bbox="1021 1254 1417 1270">LAND OFF SCHOOL ROAD, ELMSWELL   POTENTIAL DEVELOPMENT ENVELOPE</p> <p data-bbox="1346 1222 1417 1254"><b>PEGASUS GROUP</b></p>	Application boundary (TBC) 0.00 hectares / 0.00 acres	Potential development envelope 0.00 hectares / 0.00 acres	Other land in applicants control (TBC) 0.00 hectares / 0.00 acres	Potential access
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Name	Organisation	Comments
	Avison Young on behalf of National Grid	<p>Representations on behalf of National Grid</p> <p>National Grid 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.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) 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.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></li> </ul> <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks</p> <p>Information regarding the electricity distribution network is available at the website below:  <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p>Information regarding the gas distribution network is available by contacting:</p>

Name	Organisation	Comments
		<p>plantprotection@cadentgas.com</p> <p>Further Advice</p> <p>Please remember to consult National Grid 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:</p>
	Historic England	<p>Thank you for consulting us on your neighbourhood plan. Having reviewed it, at this point we don't wish to make specific comments but please find Historic England's formal response to this consultation attached [set out below] for your records. It contains links to our advice on incorporating the historic environment into neighbourhood plans, found on our website. Please contact me if you have any queries.</p> <p>Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Elmswell Neighbourhood Plan.</p> <p>We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>.</p> <p>For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Suffolk County Council.</p> <p>To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p> <p>Please do contact me, either via email or the number above, if you have any queries</p>
	Suffolk Wildlife Trust	<p>Thank you for sending us details of the Elmswell DRAFT Neighbourhood Plan, please see our comments below:</p> <p>We have reviewed the policies and plan text of the Elmswell Draft Neighbourhood Plan and we are concerned that there is limited reference to how the Neighbourhood Plan will protect and enhance the natural environment and biodiversity within the parish, in accordance with the National Planning Policy Framework (NPPF, 2021) (section 179). The plan should</p>

Name	Organisation	Comments
		<p>be expanded to include a new policy detailing how the natural environment and biodiversity will be considered with the parish.</p> <p>Species recorded in the parish of Elmswell include hedgehogs, swifts, reptiles including common lizard and slow worm, and declining garden birds such as song thrush, dunnock and house sparrow (Suffolk Biodiversity Information Service (SBIS)). Species recorded for the parish can be requested from SBIS. Although the parish is largely made up of agricultural land and urban development, priority habitats recorded in the parish include ancient woodland, wood pasture and parkland, lowland deciduous woodland<sup>1</sup> and species-rich hedgerows<sup>2</sup>. Ancient woodland is present at East Wood County Wildlife Site (CWS) to the north of the parish, which is enclosed by a ditch and bank typical of ancient woodland and thought to be of medieval origin. This CWS is also home to scarce woodland plants including yellow archangel and oxlip.</p> <p>A new policy focusing on protecting and enhancing the natural environment and biodiversity in Elmswell should reference biodiversity net gain and safeguarding protected and Priority Species (as listed within The Natural Environment and Rural Communities (NERC) Act 2006) from future development. We also recommend naming the key species and habitats for the parish to ensure strengthened protection, as well as targeting biodiversity net gain in the parish towards these key species. For example, good populations of hedgehog, swift and house sparrow have been recorded in the parish and biodiversity net gain could be targeted to help conserve these species, with knock on benefits for other species. East Wood County Wildlife Site should be referenced in the plan text and the protection of County Wildlife Sites should be included within any new policy.</p> <p>Additionally, the plan text and policies should seek to outline how development could contribute to enhancing the natural environment within the parish through habitat creation and the linking and buffering of existing habitats. Some parishes have included specific policies within their neighbourhood plans which focus on the creation of wildlife corridors within the parish. Wildlife corridor creation should focus on linking and buffering the existing ecological assets of the parish including priority habitats, CWSs and local green spaces, which should be highlighted within the plan text or policies. For example, future development could help to improve links between local greenspace in the south of the parish such as Lukeswood and green space associated with St John's Church, to the Norton Wood Site of Special Scientific Interest (SSSI) just to the west of Elmswell parish. This could be achieved by targeting wildlife enhancements and biodiversity net gain required from developers towards local farmer groups to enable them to improve hedgerows, wildlife friendly arable margins and ponds. Elmswell neighbourhood plan is a chance to shape wildlife enhancement and</p>

Name	Organisation	Comments
		<p>biodiversity net gain within the parish to best benefit people and wildlife, making the parish a better place to live and improving access to nature for everyone.</p> <p>The new Environment Act 2021 requires development proposals to achieve a 10% net gain in biodiversity; whilst not yet required in law, this level is already being implemented as good practice across the country. Therefore, we recommend that the Elmswell Neighbourhood Plan should require a minimum of 10% biodiversity net gain. The Wildlife Trusts are advocating for 20% biodiversity net gain where this is possible and pushing for more significant net gain is particularly important for a parish like Elmswell, which has a significant number of strategic allocations within the local plan. Setting an aspiration for achieving a higher percentage of net gain could help to ensure that wildlife and the rural character of the parish are conserved for future generations. Suffolk County Council's recent commitment to 'deliver twice the biodiversity net gain required'<sup>3</sup>, suggests that is reasonable to include this aspiration within the Elmswell Neighbourhood Plan.</p> <p>We hope that you find our comments useful, and that they enable you to consider the natural environment and biodiversity within your Neighbourhood Plan. Please do not hesitate to contact us should you require anything further.</p>
	Suffolk County Council	<p>Thank you for consulting Suffolk County Council (SCC) on the Pre-Submission version of the Elmswell Neighbourhood Plan.</p> <p>SCC is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:</p> <ul style="list-style-type: none"> <li>- Archaeology</li> <li>- Education</li> <li>- Fire and Rescue</li> <li>- Flooding</li> <li>- Health and Wellbeing</li> <li>- Libraries</li> <li>- Minerals and Waste</li> <li>- Natural Environment</li> <li>- Public Rights of Way</li> <li>- Transport</li> </ul> <p>This response, as with all those comments which SCC makes on emerging planning policies and allocations, will focus on matters relating to those services.</p>



Name	Organisation	Comments
		<p>Suffolk County Council is supportive of the vision for the Parish. In this letter we aim to highlight potential issues and opportunities in the plan and are happy to discuss anything that is raised.</p> <p>Where amendments to the plan are suggested added text will be in italics and deleted text will be in strikethrough.</p> <p><u>Archaeology</u></p> <p>Although the plan does not allocate sites, we would encourage a short section on the history of the parish and the archaeology/historic environment. The plan could also highlight listed buildings and non-designated heritage assets (the HER could serve as a basis, although is not comprehensive), to set context and also complement the work done on views.</p> <p>For below ground archaeology, there are a number of Saxon and Roman sites and finds within the plan area for the settlement core, and there are other sites within the wider plan area. More background information can be found on the Suffolk Heritage Explorer, which is the online version of the Historic Environment Record<sup>1</sup> maintained by Suffolk County Council.</p> <p>The following text is recommended to be included in the plan:  <i>"Suffolk County Council Archaeological Service advise that they are consulted early on development proposals so that they can advise on archaeological considerations for development and appropriate levels of assessment."</i></p> <p>The parish council may wish to highlight expectations they may have for outreach about archaeological work from development (for example, talks, open days, online resources or pamphlets, as appropriate to the scale of the work and its findings).</p> <p>For Policy ELM5, paragraph 3.13 refers to designated heritage assets, but we would also advise that non-designated heritage assets should be assessed and considered in development proposals where appropriate. The Grove Lane Industrial estate is part of the former RAF Ashfield airfield (EWL 026), which operation from WWI to the Cold War, and although there are modern buildings on the site, there is a possibility that there may be structures surviving. <a href="#">EWL 026 - RAF Great Ashfield, Airfield - Suffolk Heritage Explorer</a></p> <p>Education  <i>Early Years</i></p>

Name	Organisation	Comments
		<p>As there are no housing sites allocated in this plan, this is likely to be a minimal impact on Early Years Care providers, and their capacity to take on additional children. The strategy for this ward is to expand Woolpit pre-school to meet the needs arising from planned growth.</p> <p><i>Primary and Secondary Education</i>  Elmswell Community Primary school is being expanded from 315 to 420 places, which is due for completion for the new school year from September onwards. In addition to this expansion the current education strategy for Elmswell is to provide places at the planned new primary school in Woolpit, with a pedestrian and cycle link providing a safe route to school and connectivity between the two villages.</p> <p>SCC are planning to expand the 11-16 accommodation at Thurston Community College, from 1500 to 1650 (with a masterplan to 1800). The expansion from 1500 to 1650 is currently scheduled to be completed for September 2023.</p> <p>Fire and Rescue  The neighbourhood plan does not have a negative impact on the Suffolk Fire and Rescue Service or present any cause for concern</p> <p>Flooding  SCC would suggest reference to water management in the plan, including flood risk management, water reuse and resource management.</p> <p>It is recommended that flooding and surface water management is acknowledged in the plan, in a new policy. The following text is proposed:  <i>"Policy ELM6 - Flooding and Sustainable Drainage</i>  <i>Proposals for all new development will be required to submit schemes, appropriate to the scale of the proposal, detailing how on-site drainage will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere. Examples include rainwater harvesting and greywater recycling, and run-off and water management such as Sustainable Drainage Systems (SDS) or other natural drainage systems where easily accessible maintenance can be achieved."</i></p> <p>Health and Wellbeing  We welcome the reference to the physical health benefits that can be gained from access to pleasant outdoor areas.</p>

Name	Organisation	Comments
		<p>We welcome the reference to the physical health and wellbeing benefits that can be gained from access to pleasant outdoor. There is no mention of "healthy lifestyles", although the Plan does state "health and welfare" which are somewhat different so may need more clarity.</p> <p>There is no mention of existing health issues in Elmswell. We suggest that Policy ELM3 can link with reference from the Office of Health Improvement and Disparities; for Mid-Suffolk Area Profile<sup>2</sup></p> <p>Meeting the needs of an ageing population The neighbourhood plan does not provide any demographic information for older residents. The Suffolk Observatory states 22.6% of the residents are aged 65 or older in Elmswell. We suggest that Policy ELM1 refers to an ageing population with provisions to meet the needs of this group with adaptable homes and specialist accommodation.</p> <p>Building homes that are accessible and adaptable means that these homes can be changed with the needs of their occupants, for example if their mobility worsens with age, as these homes are built to a standard that can meet the needs of a lifetime. While it is understandable that each housing type may not be suitably accommodated on every site, efforts should be made where possible to ensure that each site contains a mixture of housing types. This can help prevent segregation by age group and possible resulting isolation.</p> <p>Therefore, the following wording is recommended for Policy ELM1, or in the supporting text paragraph 3.4: <i>"Support will be given for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2) standards), in order to meet the needs of the aging population, without excluding the needs of the younger buyers and families."</i></p> <p>We suggest there could be a paragraph in the Policy ELM1 section which clarify exact type of buildings in this Neighbourhood Plan criteria, for example does any development consist of houses only, or care homes, schools, commercial buildings. This will assist with clarity of development in Elmswell.</p> <p>We suggest that there could also be further considerations for the needs of residents who are living with dementia in the community, and the potential for making Elmswell a "Dementia-Friendly" village. Woolpit Health Centre currently confirms 105 dementia cases and is on the increase. The Royal Town Planning Institute has guidance on Town Planning and Dementia<sup>3</sup>, which may be helpful in informing policies.</p> <p>We suggest adding to Policy ELM1 that there could also be further considerations for the needs of residents to live in affordable family sized homes providing positive impacts on the physical and mental health of those living in</p>

Name	Organisation	Comments
		<p>overcrowded, unsuitable, or temporary accommodation. Affordable housing should be designed to a high standard ('tenure blind').</p> <p><u>Natural Environment</u> The plan does not contain any strategies or policies for the natural environment, biodiversity, or climate change.</p> <p>Biodiversity is not mentioned in the plan. This omission is unusual within neighbourhood plans and surprising, given the challenges the world faces.</p> <p><u>Public Rights of Way</u> There is currently no specific mention that the Plan Area includes a significant public rights of way (PROW) network. The NPPF states at paragraph 100 that planning policies and decisions should protect and enhance PROW and access, including taking opportunities to provide better facilities for users, for example by adding links to existing PROW networks.</p> <p>We would like to see specific mention of the local PROW network, its importance, and how it enables effective links with neighbouring parishes and beyond. This would ideally be included as an individual policy, with a corresponding map showing the PROW in the vicinity. The definitive map for Elmswell can be found at <a href="https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Elmswell.pdf">https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Elmswell.pdf</a> and a copy with more up to date background mapping can be obtained from my colleagues in the Definitive Map Team via <a href="mailto:DefinitiveMaps@suffolk.gov.uk">DefinitiveMaps@suffolk.gov.uk</a> Please note there may be a fee for this service.</p> <p>The Neighbourhood Plan should recognise that some rights of way provide routes for commuting, provide access to services and facilities, provide leisure routes, and also improve access for people with mobility issues. They also encourage people to be fit and healthy by providing convenient, free and low-cost, and attractive opportunities for being active.</p> <p>We would also like to see a commitment along the lines that development which would adversely affect the character or result in the loss of existing or proposed PROW will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to PROW for pedestrian, cyclist, or horse rider use. Improvements and additions to such PROW shall be delivered as an integral part of new</p>

Name	Organisation	Comments
		<p>development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate.</p> <p>The following wording is suggested to be included in a new policy regarding PROW and sustainable travel:  <i>“Development which would adversely affect the character or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use”</i></p> <p>PROW networks should be comprehensive and provide not only for recreational routes but also for meaningful routes that can realistically be used for commuting to work or school. In addition, new routes should connect to the existing network and be suitable for use by people with disabilities and reduced mobility. As part of this, a commitment to working with landowners to remove structures such as stiles which can restrict access and replacing with more accessible structures such as self-closing gates or kissing gates would be welcomed. This would help to improve connectivity and make the network more accessible.</p> <p>All new housing developments should have, where reasonably possible, new footpath and/or bridleway connections created, linking to the existing right of way network surrounding the village</p> <p>There could be reference to other strategies that support this Neighbourhood Plan. This includes Suffolk County Council's Green Access Strategy (2020-2030)<sup>8</sup>. This strategy sets out the council's commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.</p> <p><b>Transport</b></p> <p>It is noted that there are no transport related policies, nor any mention of traffic or travel in the plan. We note that the plan does not mention the railway station at Elmswell, or any other methods of public transportation.</p> <p><i>Parking</i></p> <p>It is recommended that the plan refers to and accords with Suffolk Guidance for Parking (2019)<sup>9</sup> in the proposed policies (such as Policy ELM4 Sport and Recreation, ELM5 Employment) or in an additional highway/transport related policy. The plan should also include cycle storage and EV charging requirements at new developments.</p>

Name	Organisation	Comments
		<p><i>Sustainable travel</i></p> <p>We note that there is no mention of any forms of sustainable travel such as walking and cycling, nor of the Elmswell/Woolpit cycle link. Funding for the Elmswell/Woolpit pedestrian/cycle route is being provided by developments in the settlement and it is envisaged that it can be provided well before the end of the plan period. Therefore, it would seem appropriate to include it in the plan.</p> <p>SCC recommends a sustainable transport policy is added, setting out the requirements and aspirations for sustainable travel in the village - this could include PROWs, as stated in the section above. In particular SCC would recommend that the policy supports the objectives of the Ipswich Strategic Planning Area Transport Mitigation Strategy, which includes Mid-Suffolk. The Neighbourhood plan has the potential to contribute to this strategy, by including policies which improve connectivity to surrounding villages and the railway station, which would help to enable transport mode shift.</p> <p>As such, the following wording is suggested for a new Transport/Sustainable Travel Policy:</p> <p><i>“Development proposals should seek to maximise sustainable modes of transport as a priority, ensuring that the site is connected to existing services and facilities, and is accessible via active travel such as walking and cycling, as well as public transport.</i></p> <p><i>All new developments will be required to include car parking (including EV charging points) and secure cycle storage standards in accordance with Suffolk Guidance for Parking.</i></p> <p><i>Development will be expected to contribute to The Ipswich Strategic Planning Area Transport Mitigation Strategy by providing or contributing to improved walking and cycling connections to the surrounding settlements (for example the Elmswell-Woolpit cycle and pedestrian link) and improved connectivity to the railway station.</i></p> <p><i>Improvements to facilities at the railway station will also be supported.”</i></p> <p>General</p> <p>The diagram displayed in paragraph 1.8 indicates the timescale for the Elmswell neighbourhood plan. However, the second box should read “<i>Submission Draft</i>” not “<i>Pre-Submission Draft</i>”, as this is indicated in the first box.</p> <p><i>Settlement Boundary</i></p> <p>There appears to be variations between the settlement boundary displayed on Map 2 and on the Inset Policies Maps. The settlement boundary is indicated on the Key on the overall Policies Map, but does not appear on the map itself. It is recommended that the settlement boundary is displayed on the overall Policies Map on page 13, as its is on the inset maps.</p>

Name	Organisation	Comments
		<p>We note paragraph 3.2, stating that the most current settlement boundary is from the 1998 Mid Suffolk Local Plan, until the Emerging Joint Local Plan makes any further progress.</p> <p>It is recommended that the neighbourhood plan should also include a map displaying the new settlement boundary, as displayed from Map 1 from the "Summary Leaflet", as found on the parish council's consultation page (screenshot below) [not reproduced in this appendix]. This map should be labelled as "<i>Map 3 Neighbourhood Plan Settlement Boundary</i>". By only having a map displaying the old settlement boundary in the plan, this could lead to ambiguity over where the new settlement boundary lines are.</p> <p>I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the SCC's Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources.</p> <p>The guidance can be accessed here: <a href="#">Suffolk County Council Neighbourhood Planning Guidance</a>.</p> <p>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.</p>
	Mid Suffolk District Council	<p>Thank you for consulting Mid Suffolk District Council on the Regulation 14 Pre-submission draft Elmswell Neighbourhood Plan. This letter represents our formal response.</p> <p>As has been explained in the introductory chapter, we note that a combination of factors delayed the preparation of this draft plan, which is now presented with just five key policies. We note also that there are two background studies. As neither run to many pages, the parish council might want to consider incorporating these as appendices to the Plan rather than continue to publish them as separate documents.</p> <p>Turning back to the Plan itself, none of the policies raise any specific concerns. We do however have some observations which are mostly presentational matters. These are set out in the appended table.</p> <p>Although unlikely, we also remind you that should you feel it necessary to make substantive changes to the Plan following this round of consultation, it will be appropriate and necessary to repeat this exercise prior to formally submitting the Plan and other required documents to the District Council.</p> <p>General Comment</p>



Name	Organisation	Comments
		<p>When referring to district level plans throughout, please use 'the Babergh &amp; Mid Suffolk Joint Local Plan' and/or 'the Joint Local Plan' (see for example Policy ELM1).</p> <p><b>Front Cover</b> In future iterations, include the plan 'stage' on the front cover, i.e., 'Submission Draft' etc. You should also consider adding the plan period. Paragraph 1.5 gives an end date of 2037, to coincide with the current end date of our emerging Joint Local Plan so, presumably, the Elmswell NP has a start date of c.2022 (to give a 15 year plan period).</p> <p><b>Para 1.6</b> This refers to a list of the prep work undertaken in the early days of the plan. The list appears to be missing.</p> <p><b>Para 1.8</b> In the stages flowchart, the first two entries repeat one another. Some natural updating will also be necessary as this Plan progresses.</p> <p><b>Para 2.5</b> Insert the word 'Plan' as follows: "... Joint Local Plan ahead of ..."</p> <p><b>Para 2.6</b> Our current standing advice to NP Groups is that the minimum housing requirement figures in Table 4 of the JLP (Nov 2020) should continue to be treated as the indicative number until such time as the work that will inform the Part 2 JLP has been completed.</p> <p><b>Para 3.3</b> We note and welcome the approach taken to defining a new / relevant settlement boundary for Elmswell. In the first line, we suggest '...that has taken place ....</p> <p><b>Para 3.5</b> For consistency, consider deleting '(2021)' after NPPF. All other references to the NPPF after para 2.2 are undated except for this one.</p> <p><b>Policies Map</b> Consider changing the shade of colour used to identify the ELM 5 employment sites, especially given that blue is also used to identify all areas that fall outside of the designated NP area.</p>
<p><b>Parish Council response:</b></p> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• The maintenance of public rights of way is not a matter that can be covered by planning policies.</li> <li>• The neighbourhood plan is not proposing further housing development and is not required to identify additional sites to be in accordance with the strategic policies of the Local Plan.</li> </ul>		

Name	Organisation	Comments
		<ul style="list-style-type: none"> <li>• The indication of the site north of St Edmunds Drive and its inclusion within the Settlement Boundary was included in error as the site has not got the benefit of planning permission but was identified as an allocation in the Joint Local Plan prior to the Planning Inspectors requiring that, through modifications, all new allocations are deleted from that Plan and reassessed. The Policies Map will be amended accordingly.</li> <li>• The neighbourhood plan needs to be deliverable in the period to 2037. A bypass proposal could not be sufficiently demonstrated that it could be delivered.</li> <li>• Highway improvements do not generally need planning consent and the issues relating to parked cars is a matter for the County Highways Department to address rather than the Neighbourhood Plan.</li> <li>• The Parish Council is working with the authorities to deliver a path between Elmswell and Woolpit outside of the context of the Neighbourhood Plan.</li> <li>• The NPPF provides specific criteria for the designation of Local Green Space, which is not the same as, for example, their designation as a County Wildlife Site as they serve different purposes.</li> <li>• It is not necessary for the Plan to include a policy focusing on protecting and enhancing the natural environment and biodiversity. This will be addressed in the new Joint Local Plan that should be adopted in 2023.</li> <li>• The Plan notes that it has been necessarily limited on what it covers due to the ever-changing situation with the Local Plan.</li> <li>• It is not considered necessary, in order that the Plan meets the Basic Conditions, to include a short section on the history of the parish and the archaeology/historic environment.</li> <li>• The Parish Council is not required to assess non-designated heritage assets as part of the preparation of the Plan.</li> <li>• The Parish Council is not required to include a policy on flooding in order that the Plan meets the Basic Conditions.</li> <li>• Policy ELM1 addresses the location of new development and is not intended to support particular types of additional housing, especially given that no new sites are proposed.</li> <li>• As noted above, the position of View 6 will be corrected.</li> <li>• Matters relating to housing design including vehicle charging points and sustainable heating will be addressed in the new Local Plan when adopted.</li> <li>• The amendments suggested by Mid Suffolk DC will be taken on board, with the exception of the reference to the minimum housing requirements, which have no standing since the Local Plan Inspector's ruled that these should be dealt with in a new Part 2 Local Plan.</li> </ul>
		<p><b>Proposed changes:</b></p> <ul style="list-style-type: none"> <li>• Amend Inset North and Inset South of the Policies Map to delete the land indicated with planning permission north of St Edmunds Drive and realign the Settlement Boundary accordingly.</li> <li>• Incorporate the corrections identified by Mid Suffolk DC</li> </ul>

## Appendix 7 - Schedule of Post Pre-Submission Consultation Modifications

The table below sets out the changes made to the Neighbourhood Plan following the Regulation 14 Pre-Submission Consultation and the reasons for the modifications. Changes subsequent to the deletion of paragraphs or policies are not identified in this schedule.

Deletions are struck through eg deletion      Additions are underlined eg addition

Page	Paragraph or policy number	Proposed modification	Reason
Cover		Amend titles as follows: Elmswell Neighbourhood Plan <u>2022-2037</u>  <del>Public Consultation-Submission Plan Spring 2022 January 2023</del>	To bring the Plan up-to-date
Contents page		Amend as necessary as a result of modifications in this schedule	To bring the Plan up-to-date
5	1.6	Amend as follows: A lot of work took place in the early days of preparing the Plan <del>as set out in the list below</del> . However, having reviewed the situation with the Joint Local Plan, it was decided to limit the content of the Plan to that which would provide a layer of local detail to supplement the higher-level planning policies.	To correct error.
5	1.7	Amend as follows: <u>The Neighbourhood Plan contains planning policies that, when the Plan is complete, will be used alongside the Joint Local Plan as a starting point for consideration of planning applications. This is the first draft of the Neighbourhood Plan, known as the "Pre-submission Plan", was consulted on for six weeks in Spring 2022 which is being consulted on for six weeks. The Neighbourhood Plan contains planning policies that, when the Plan is complete, will be used alongside the Joint Local Plan as a starting point for consideration of planning applications.</u> <del>At the end of the consultation, comments will</del>	To bring the Plan up-to-date

Page	Paragraph or policy number	Proposed modification	Reason
		<p><del>be</del> <u>were</u> reviewed and any necessary amendments to the Plan made ahead of submission to Mid Suffolk District Council for further consultation and then scrutiny by an Independent Examiner. Following the examination, and subject to the Examiner's response and Mid Suffolk's approval, a referendum of residents on the Electoral Roll will be held to vote on whether the Plan should be used by the District Council when deciding planning applications.</p>	
5	1.8	<p>Amend flow chart as follows:  Pre-Submission Draft Neighbourhood Plan  SPRING 2022</p> <p><del>Pre-Submission Draft Neighbourhood Plan</del>  <del>SPRING 2022</del> <u>WINTER 2022/23</u></p> <p>Consultation by Mid Suffolk District Council  <del>SUMMER 2022</del> <u>WINTER 2022/23</u></p> <p>Independent Examination  <del>LATE SUMMER 2022</del> <u>SPRING 2023</u></p> <p>Parish Referendum  <del>AUTUMN 2022</del> <u>SUMMER 2023</u></p>	To bring the Plan up-to-date
6	2.2	<p>Amend second sentence as follows:  In July 2021 the Government published a Revised NPPF, <u>while in December 2022 a consultation was launched on proposed changes to the NPPF. Those proposed changes have not been taken account of in the Neighbourhood Plan as it was submitted to Mid Suffolk District Council prior to the end of the consultation.</u></p>	To bring the Plan up-to-date
7	2.5	Amend first sentence as follows:	To correct error

Page	Paragraph or policy number	Proposed modification	Reason
		In November 2020 the District Council consulted on the final draft of the Joint Local <u>Plan</u> ahead of its submission to the Secretary of State and the subsequent examination by the Planning Inspectorate.	
7	2.7	Amend paragraph as follows:  It is <u>unlikely</u> that Part 1 of the Joint Local Plan will be adopted <u>until sometime in 2023, after the Neighbourhood Plan has been examined, towards the end of 2022</u> , while Part 2 is likely to take a further 2-3 years to complete. The Neighbourhood Plan has been prepared to have regard to what is expected to be in Part 1 of the Plan.	To bring the Plan up-to-date
9	3.3	Amend first sentence as follows:  Given the level of development <del>that's that has</del> taken place in Elmswell since 1998, the Settlement Boundary bears little resemblance to what is on the ground.	In response to comments
9	3.5	Amend third sentence as follows: Proposals of this nature are referred to in paragraph 84 of the NPPF ( <del>2021</del> ) and may be supported where the impact on the landscape can be minimised and where it can be demonstrated that adequate road and infrastructure exists or is capable of being provided in a timely manner.	In response to comments
10	ELM3	Amend policy as follows: Policy ELM 3 – Local Green Spaces The following Local Green Spaces are designated in this Plan and identified on the Policies Map <u>and in Appendix 1</u> : 1. <del>o</del> <u>O</u> pen space south and west of Hanover Court 2. <del>a</del> <u>A</u> llotments, Church Hill 3. Cemetery, Church Hill 4. Lukeswood, Church Road 5. <del>a</del> <u>A</u> menity open spaces, Pightle Close 6. Crown Mill play area	In response to comments

Page	Paragraph or policy number	Proposed modification	Reason
		<p>7. Hall Lane play area</p> <p>8. <del>p</del> Playing field off Thedwastre Close</p> <p>9. <u>Town Field, off Spong Lane</u></p>	
12	ELM5	<p>Amend criterion i. as follows:</p> <p>i. <u>financial</u> evidence can be provided that <del>genuine attempts have been made to sell/let the site/premises for a minimum of six months,</del> in its current use, and that it can be demonstrated that no suitable and viable alternative employment /business uses can be found or are likely to be found in the foreseeable future; or</p>	In response to comments
14	Inset North	<p>Amend Inset North of the Policies Map to:</p> <p>i. delete the land indicated with planning permission north of St Edmunds Drive and realign the Settlement Boundary accordingly.</p> <p>ii. amend the Settlement Boundary Inset North of the Policies Map to include land granted planning consent under application DC/20/05053.</p> <p>iii. Amend locations of viewpoint 6 and 9</p>	To correct errors and in response to comments
15	Inset South	<p>Amend Inset South of the Policies Map to:</p> <p>i. delete the land indicated with planning permission north of St Edmunds Drive and realign the Settlement Boundary accordingly.</p> <p>ii. amend the boundaries of the Cemetery and Lukes Wood Local Green Space to illustrate correct boundaries</p> <p>iii. add additional Local Green Space at Town Field.</p>	To correct errors and in response to comments