



**NEEDHAM MARKET TOWN COUNCIL**

# **Needham Market Neighbourhood Plan**

***THE FUTURE OF OUR TOWN  
2020 to 2036***

***Consultation Statement  
October 2020***



**GET  
NEEDHAM  
MARKET  
NEIGHBOURHOOD  
PLAN  
DONE**

**Community Consultation  
Needham Market Community Centre  
17th and 18th January**



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## ◆ 1. INTRODUCTION

- 1.1 The Needham Market Neighbourhood Development Plan is a community-led document for guiding the future development of the town. It is the first of its kind for Needham Market and a part of the Government's current approach to planning. It has been undertaken with extensive community engagement, consultation, and communication.
- 1.2 The Consultation Statement is designed to meet the requirements set out in the Neighbourhood Planning (General) Regulations 2012 for Consultation Statements. This document sets out the consultation process employed in the production of the Needham Market Neighbourhood Plan. It also demonstrates how the requirements of Regulation 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 have been satisfied.
- 1.3 The Needham Market Town Council (NMTC) have endeavoured to ensure that the Neighbourhood Plan reflects the desires of the local community and key stakeholders, which have been engaged with from the outset of developing the Plan.
- 1.4 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012.
- 1.5 Section 15(2) of Part 5 of the Regulations sets out what a consultation statement should contain:
  - a) Details of the persons and bodies who were consulted about the proposed Joint Neighbourhood Plan;
  - b) Explains how they were consulted;
  - c) Summarises the main issues and concerns that were raised by the persons consulted;
  - d) Describes how these issues and concerns have been considered and where relevant, addressed in the proposed Neighbourhood Plan.
- 1.6 This consultation statement will also demonstrate that the process undertaken to produce the Needham Market Neighbourhood Plan has complied with Section 14 of the Neighbourhood Planning (General) Regulations 2012. This sets out that before submitting a Neighbourhood Plan to the Local Planning Authority (in this case Mid Suffolk District Council) a qualifying body (in this case the Town Council) must:
  - i. Publicise, in a manner that it is likely to bring it to the attention of people who live or work within Needham Market;
  - ii. Provide details of the proposals within the Neighbourhood Plan;
  - iii. Provide details of where, how and when the proposals within the Plan can be inspected;
  - iv. Set out how representations may be made; and
  - v. Set out the date for when those representations must be received, being not less than 6 weeks from the date from when the draft proposals are first publicised;
  - vi. Consult any consultation body referred to in Para 1 of Schedule 1 whose interests the qualifying body may be affected by the proposals for a Neighbourhood Plan;
  - vii Send a copy of the Neighbourhood Plan to the Local Planning Authority.
- 1.7 Furthermore the Planning Practice Guidance (PPG) at paragraph 15, requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan and to ensure that the wider community:
  - is kept fully informed of what is being proposed,
  - can make their views known throughout the process,
  - has opportunities to be actively involved in shaping the emerging Neighbourhood Plan
  - Is made aware of how their views have informed the draft Neighbourhood Plan or Order



### ◆ 2. CONTEXT FOR THE NEEDHAM MARKET NEIGHBOURHOOD PLAN

- 2.1 The idea of producing a Neighbourhood Plan for Needham Market formally began in 2013, when a discussion was held at the Open Annual Town Meeting which included the adjoining parishes. The public meeting was held to gauge support for the production of a Neighbourhood Plan and support for proceeding was expressed.
- 2.2 The Town Council endorsed the process and by doing so decided to use the new powers and processes available to it under the 2011 Localism Act and prepare a Neighbourhood Plan.
- 2.3 A Group to oversee and guide the Neighbourhood Plan was put in place that consisted of a sub-group of Town Councillors. The Group was keen to be as democratic and open as possible and sought volunteers to join the group from the local community. All Steering Group Members were local residents although some of the original members have now moved on.
- 2.4 A key driver for the Neighbourhood Plan was to give residents a voice in the sustainable development of the Town, by building a Plan that is inclusive, innovative and bespoke to the needs of the parish. The Plan is based on evidence from local people, preserving unique and positive features that residents value. It promotes community cohesion and develops a framework for economic, social, and environmental sustainability.
- 2.5 To spread the word about the emerging Neighbourhood Plan, the Town Council agreed engagement needed to be effective throughout the process if it were to result in a well-informed plan and a sense of local ownership. Communication is dealt with in **Section 5** of this report.



## ◆ 3. DESIGNATION OF THE NEIGHBOURHOOD PLAN AREA

- 3.1 In June 2013, the Town Council submitted an Area Designation Application to define the boundary of the Neighbourhood Plan area. The publication period began on 4 July 2013 and (following an extension) closed on 27 Sept 2013. Under the Neighbourhood Planning (General) Regulations 2012 (as amended), Mid Suffolk District Council confirmed the designated NDP Area on 30 Sept 2013. The plan area was the whole parish of Needham Market.
- 3.2 The Neighbourhood Plan Designated Area application and Map can be found in full at **Appendix A**.
- 3.3 The Neighbourhood Plan Designated Area Decision Notice can be found in full at **Appendix B**.



### ◆ 4. COMMUNITY ENGAGEMENT STAGES

- 4.1 The Needham Market Neighbourhood Plan Steering Group led on the preparation of the draft plan and it is hoped that the document reflects the community's vision and aspirations for the future of the Town. In order, to create a Plan that represents the needs and aspirations of residents, the Town Council has drawn upon a number of sources including evidence gathered through the various stages and as a result of stakeholder and community input.
- 4.2 The management of the Neighbourhood Plan process has been undertaken by the Steering Group Members themselves with support from the Town Clerk, the Town Council and other local residents as required. Three independent planning consultants have also provided professional and technical support at key points in the process.
- 4.3 There is a dedicated Neighbourhood Plan web page which contains details of the progress of the Neighbourhood Plan. The main Town Council website includes notes from relevant Town Council meetings including the updates from the Steering Group on Neighbourhood Plan progress. The website has been updated regularly to provide information to residents about the process and as well as advance notice of any consultations or events.  
<https://www.needhammarkettc.co.uk/neighbourhood-plan/>
- 4.4 Since work began on the Neighbourhood Plan in 2013, a programme of events has been used to help offer the Needham Market Neighbourhood Plan to the people and businesses of the town and the nearby Parishes
  - First discussion with adjoining parishes and Open Annual Town Meeting 2013.
  - Consultation with local groups including Bosmere school parents via Environment Week School Project.
  - Publicity through the monthly Needham Market newsletter.
  - Evidence base prepared for Town Council – initial findings circulated 4 April 2014.
  - First Consultation Open Day 22 June 2014.
  - Business Community Survey – High Street focus + industrial areas July 2014.
  - Non statutory invitation to allow other agencies involvement - letters sent August 2014.
  - Second Consultation Open Day 20 September 2014.
  - Popup High Street shop days October 2014.
  - Facebook/Twitter presence October 2014.
  - Third Consultation Open Day 21 March 2015.
  - Regulation 14 Public Consultation – 6 weeks – July to September 2015.
  - Work suspended 2016 (See paragraph 4.10 below).
  - Public Exhibition on AECOM Feasibility – March 2019.
  - Stakeholder Meetings with Mid Suffolk and Suffolk County Council – July 2019.
  - Stakeholder Meeting with Barking Parish Council – July 2019.
  - 2nd Regulation 14 Consultation - 6 weeks – January to March 2020 (including two-day Community Consultation Open Public Event)



## Summary of Key Issues Raised

4.5 The key issues raised by participants during the early consultation events were:

- Some new homes will be needed to maintain a healthy flow without swamping the town.
- There is strong opposition to the development of “greenfield” (currently in use for agriculture) land on the fringe of the town before development of “brownfield” sites are exhausted.
- It is anticipated several “brown field” sites (areas of land which have been used previously e.g. Needham Market Middle School site) will become available for redevelopment during the plan period NB: The downside of “brown field” redevelopment is it rarely delivers meaningful contribution to improvements in infrastructure and/or public service benefits as developers are often able to make a case for making no or reduced contributions as a result of viability. Additional costs regularly apply to redevelopment of “brown field” sites which don’t exist for development of “greenfield” sites (e.g. remediation of land).
- Needham Market Country Practice (GP Surgery and Pharmacy) would be far better located in the core of the town – the current location of the Practice demands the use of a vehicle for many patients causing pressure on grossly inadequate parking facilities.
- The High Street is already very busy and does it have capacity to cope with extra traffic?
- The High Street is subject to a vehicle weight restriction but, this is often ignored causing disruption and danger to people in the vicinity plus damage to heritage properties.
- The provision of adequate parking for visitors/ customers of High Street businesses is vital to those businesses’ prosperity.
- There are significant traffic related areas of concern, notably at Needham Market Country Practice, Barking Road and problems associated with the low railway bridge on Coddenham Road, which provides the only direct link from the town to the A14.
- The impact of ‘school’ traffic on Quinton Road has led to the rerouting of a bus service to the detriment of bus users (particularly older people and people with young children).
- Access to Needham Market Railway Station is restricted for people who have mobility problems.
- Business and employment opportunities are good provided the industrial/commercial/retail areas of the town remain vibrant and attractive.
- The loss of banking facilities in the town has undermined its offer to businesses, visitors and residents.
- The population is living longer – so there will be an increasing number of older people in the town.
- There is a significant growth in young people forecast in the plan period (to 2036) and additional development of new housing will bring young families to the town.
- Premises which provide facilities for children and young people (e.g. the Scout Hut at the Camping Land and the Internet Cafe in School Street) are at or nearing end of life.
- The general environment of the town is good, and it benefits considerably from the proximity of Needham Lake.

4.6 A Town Health Check was undertaken in 2004 and through the Neighbourhood Plan process the Town Council was able to reassess the issues raised as part of the Town Health check, in the context of the issues raised through the Neighbourhood Plan consultation events and an initial **SWOT** (Strengths, Weaknesses, Opportunities and Threats) analysis was undertaken.





## Strengths

- Distinctive buildings in the historic core of the town
- Attractive shopping area
- Good quality environment in the High Street e.g. improved pedestrian safety and public realm improvements
- Good footpath and cycle routes and access to countryside
- Lack of recent greenfield development
- Protection of open spaces
- Broad range of shops and reasonably high occupancy rate
- Low unemployment
- Training opportunities reflecting employers' needs
- Good tourism economy
- Range of cultural and sporting activities
- Low crime
- Ease of movement to and from the town by public transport

## Opportunities

- Management and value of the countryside
- Increased job opportunities and expansion of existing companies at Lion Barn Estate
- Better promotion of the town centre (particularly at the Lake)
- Scope for new safe walking and cycling routes; including secure cycle parking

## Weaknesses

- Limited range of quality tourism accommodation
- Poor national coach service and accessibility
- Conflict between pedestrians and cars at specific locations in the town centre
- Limited disabled parking
- Access to A14 impeded by Coddendam Railway Bridge

## Threats

- Loss of retail floorspace
- Limited range of tourism accommodation
- Inadequate signage to visitor attractions
- Housing affordability
- Frequency of rail services
- Condition of some sport and leisure facilities
- Congestion in the town centre increasing
- Poor public transport connections to surrounding villages



4.7 The issues outlined above provided Needham Market Town Council with some prompts to work towards the establishing of an overarching vision and a set of objectives to refine through debate at the consultation open days and workshops. The outcomes from these discussions produced an updated SWOT assessment which helped shape the vision and identified objectives to deliver that vision.

## Strengths

- Quality High Street environment as a Heritage Asset
- Good breadth of services available to the community
- Jobs available locally and low unemployment compared with national average
- Housing stock in generally good condition
- Attractive rural setting for the town
- Community spirit based on an activity of key community workers and participants

## Weaknesses

- Age of buildings housing community groups
- Disconnection between the town and Needham Lake
- Dependency on a few key community workers/participants
- Poor approach to the town from Coddendam Road

## Opportunities

- New housing to take place on largely brownfield sites
- Attraction of Needham Lake to tourists and other visitors
- High quality heritage assets in the town
- Opportunities afforded by Community Infrastructure Levy (CIL) to deliver community priorities
- Planning for the future through the Neighbourhood Plan process

## Threats

- Prospect of increased traffic in the town centre due to new development
- High Street environment eroded by increased traffic
- Ageing population placing increasing pressure on local health facilities
- Decline of key community workers
- Job losses/relocation of District Council offices away from the town
- Key development sites yielding low community benefits

4.8 Details of the consultation events were also published in the monthly Needham Market Newsletter. Posters and flyers were used to publicise events and banners were erected at the main road entrances and at the Community Centre. Feedback from consultation events indicated that flyers and regular updates in the newsletter were the most effective form of communicating progress on and promotion of Neighbourhood Plan events. Reports to the Town Council on Neighbourhood Plan progress was presented regularly.



### Pre-Submission Consultation (REG 14) – July/September 2015

4.9 In July 2015, the Town Council published the Pre-Submission Consultation Draft of the Needham Market Neighbourhood Plan for a 6 week period of consultation, which was extended to 7 weeks at the request of Mid Suffolk District Council. Members of the public and statutory consultees were invited to comment upon the draft plan. Responses were received from the following consultees:

- Historic England
- Suffolk County Council
- Natural England
- Barking Parish Council
- Mid Suffolk District Council
- Gladman Developments Ltd
- Hopkins Homes
- Coddenham Parish Council
- Suffolk Preservation Society

4.10 Following the conclusion of the consultation period, the Town Council concluded that there was considerable uncertainty in respect of the housing requirement that the Neighbourhood Plan should be adhering to. There had been significant delay in progress on the New Local Plan (which is due to replace the Mid Suffolk Local Plan 1998, the Core Strategy adopted in 2008 and the 2012 Core Strategy Focussed Review). Babergh and Mid Suffolk District Councils had agreed to work together to produce a single plan that would cover both Districts; however this decision meant that progress on the emerging Local Plan had slowed. Mid Suffolk District Council was experiencing shortfalls in its housing land supply leading to some appeal decision in the town that were unpopular locally. The Town Council therefore resolved in 2016, to suspend production of the Neighbourhood Plan until it felt there was sufficient clarity around the housing requirement for the town..

4.11 In 2017, following a successful application for Government Technical Support Grant, AECOM were engaged to add a Master Planning aspect to the development of the Neighbourhood Plan. Their work culminated in two outcomes, a Master Plan Feasibility Report based on the concept of creating a relief road taking traffic away from the historic core of the town and a Design Guidelines Report. The former was the subject of a two-day Public Engagement Event in late 2018.

### Pre-Submission Consultation (REG 14) – 17th January- 10th March 2020

4.12 In early 2019, the Town Council, having appraised feedback from the Public Engagement Event held late 2018, agreed a revised brief to complete its technical support package with AECOM (To produce a Design Guidelines Report to supplement the Master Plan Feasibility Report). In mid-2019, (following Local Council Elections) a new Planning Consultant was appointed. Work began on refreshing and re-examining the draft Neighbourhood Plan. In July 2019, Babergh and Mid Suffolk published the Preferred Options (REG18) Version of the Joint Local Plan, which set out the settlement hierarchy for the two Districts together with Housing Numbers for each Neighbourhood Plan Area. This provided a degree of certainty and clarity that had not been present and the Town Council were able to make progress on redrafting the Neighbourhood Plan.

4.13 In January 2020, the 2nd Pre-Submission (REG14) consultation was undertaken which was introduced by a two-day public 'drop-in exhibition held on the 17th and 18th January at the Community Centre. Members of the public were invited to view copies of the draft policies and leave their comments.



4.14 The exhibitions were attended by with over 110 visitors over the two day period. Those attending were asked also to indicate whether they would support the plan as drafted at a referendum. The results were as follows:

Support 92 (84%)

Not Sure 16 (14%)

Reject 2 (2%)

No Mark 2

(above % figures rounded)



4.16 The Pre-Submission Regulation 14 Consultation was undertaken between 27th January and 10th March 2020. The consultation lasted for just over 6 weeks.

4.17 The pre-submission consultation was publicised via the Town Council website and an article in the Needham Market Town Newsletter and via other prominent public notices. Copies of the draft Plan and response forms were available on the website plus hard copies were available from the Town Council Offices and Needham Market library. A copy was also sent to Mid Suffolk District Council who included details of the consultation on their Neighbourhood Plan website:

<https://www.midsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-planning-in-mid-suffolk/needham-market-neighbourhood-plan/>

<https://www.needhammarkettc.co.uk/>



4.18 Notifications of the consultation and details of how to view the draft plan and submit and return comments were sent to a wide range of consultees. The list of consultees is shown at **Appendix C**.

4.19 Following the closing date of the Pre-Submission Consultation, 83 comments had been received from members of the public and responses had been received from the following statutory consultees:

- Suffolk Preservation Society
- Anglian Water
- Environment Agency
- Mid Suffolk District Council
- Natural England
- Historic England
- Suffolk County Council
- Ipswich and East Suffolk CCG
- Gladman Developments Ltd

4.20 All responses were acknowledged, and respondents informed that their comments would be considered by the Town Council in due course. The Town Council examined all responses and each separate comment received consideration. This exercise involved all Councillors and was managed on a virtual basis, following the imposition of the COVID-19 Lockdown, when physical Council meetings were not possible. The responses from the Statutory Consultees are shown at **Appendix D** and from members of the local community at **Appendix E**. The tables show each individual comment made together with the response of the Town Council and any proposed changes to the Plan.

### Summary of key issues raised.

4.21 The key issues raised during the 2nd REG14 consultation exercise can be summarised as:

- General support for the plan
- Support for the fact that the plan does not make any additional housing allocations above that already permitted
- Requests for minor changes to aid clarity for text and policy wording
- Need to refer to SCC parking standards
- Need to refer to Public Rights of Way
- Need to refer to Floodrisk
- Clarity required around difference between designated and non-designated heritage assets
- Suggestion for new policy protecting non designated heritage assets
- Clarity over the Primary Shopping Area required
- Policy Map to be added



4.22 Following consideration of these representations the following key changes were made to the NDP policies:

- Factual updates and correction of errors
- Addition of Policy Map
- Addition of Map to show extent of Primary Shopping Area
- Additional wording to aid clarity for Design Policy NM2
- References to Public Rights of Way, Parking Standards have been added
- New section on Floodrisk
- Revised wording for Heritage Section to aid clarity
- Inclusion of Community Action Project to identify Non Designated Heritage Assets for future plan
- Other changes as a result of changes to the Use Classes Order introduced in September 2020.

### **REG 16 – Submission**

4.23 Following consideration of the revised Neighbourhood Plan documents at the Town Council Meeting of 16th September 2020 and approval by Needham Market Town Council on 21st October 2020, the Neighbourhood Plan and its supporting documents were submitted to Mid Suffolk District Council.

4.24 The documents together with this Consultation Statement and the Basic Conditions Statement can be viewed at:

<https://www.needhammarkettc.co.uk/>

and on Mid Suffolk's Neighbourhood Plan pages of their website:

<https://www.midsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-planning-in-mid-suffolk/needham-market-neighbourhood-plan/>



## ◆ 5. COMMUNICATION

- 5.1 Good communication is key to the local community feeling included and informed about the progress and content of the Needham Market Neighbourhood Plan.
- 5.2 Essential to this was the Neighbourhood Plan page on the Needham Market Town Council website. <https://www.needhammarkettc.co.uk/>. The website was updated regularly during the production of the Neighbourhood Plan and new information included to publicise upcoming consultations..
- 5.3 To spread news of the emerging Neighbourhood Plan, the Town Council used:
- Town Council website <https://www.needhammarkettc.co.uk/>.
  - Event posters and A Boards which were located throughout the Town
  - Neighbourhood Plan Banners erected to publicise the drop-in events
  - Regular articles and updates in the Town Council Magazine (The Needham)
  - Facebook groups
  - Mid Suffolk District Council's Website (Neighbourhood Plan pages)
  - Local Press (East Anglian Daily Times)



## ◆ CONCLUSION

- 6.1 The programme of community engagement and communications carried out during the production of the Needham Market Neighbourhood Plan was extensive and varied. It reached a wide range of the local population and provided opportunities for many parts of the local community to input to and comment upon the emerging policies.
- 6.2 The comments received throughout and specifically in response to the consultation on 2nd REG14 Pre-Submission draft (January 2020) of the Needham Market Neighbourhood Plan have been addressed, in so far as they are practical, and in conformity with the National Planning Policy Framework and the policies in the Adopted Development Plan for the Mid Suffolk District and the emerging Babergh-Mid Suffolk Joint Local Plan.





## Appendix A - Application for Neighbourhood Plan Area Designation

Reference: ANA40161

### Application to designate a Neighbourhood Area

Town and Country Planning Act 1990  
Neighbourhood Planning (General) Regulations 2012

#### Publication of applications on the Babergh/Mid Suffolk District Council websites

Please note that the information provided on this application form may be published on the Authority's website. If you require any further clarification, please contact the Communities team.

#### 1. Parish Clerk details

**Title:\*** Town Clerk  
**First name:\*** Kevin  
**Last name:\*** Hunter  
**Property name or no.:\*** Town Council Office  
**Address 1:\*** School Street  
**Address 2:**  
**Address 3:**  
**Town:\*** Needham Market  
**County:\*** Suffolk  
**Postcode:\*** IP6 8BB  
**Email address:** clerk@needhammarketcc.f9.co.uk

#### 2. Additional contact details (if different)

**Title:**  
**First name:**  
**Last name:**  
**Property name or no.:**  
**Address 1:**  
**Address 2:**  
**Address 3:**  
**Town:**  
**County:**  
**Postcode:**  
**Email address:**

#### 3. Relevant body:

Please confirm that you are the relevant body to undertake neighbourhood planning in your area in accordance with section 61G of the 1990 Act and section 5C of the 2012 Regulations.

- Yes  
 No

**District:\*** Mid Suffolk  
**Parish:\*** Needham Market

#### 4. Name of the Neighbourhood Area:

**Please give a name which your neighbourhood area will be formally known:\***  
Needham Market

#### 5. Extent of the area:

**Please indicate below and attach an OS plan showing the intended extent of the area:\***

- Whole parish boundary area:  
 Part of the parish:  
 Joint with neighbouring parish:

**Please describe below why you considered the extent of the neighbourhood area is appropriate:\***

The town of Needham Market has a traditional and annually marked boundary, celebrated in a "beating the bounds" ceremony. The Boundary Review of 2009 reassessed this boundary. It defines the plan area which contains the Conservation Area, the Shopping frontages and the towns' boundary as defined in the District Council's Core Strategy. This core area also includes the Visually Important Open Spaces (VIOS) that provide protection for the amenity of the town's play and park lands. It will be appropriate to consider the possibility of development and any specific proposals for development within or abutting the line identified.

A focussed approach within the identified boundary will allow careful examination of the town's economic, transport, environmental and social issues while providing a clear understanding of the relationship with the surrounding villages. The surrounding populations are closely related to the working and well being of the town of Needham Market and will become the subject of discussion through cross boundary discussion. The Town Council wishes to maintain the focus on its neighbourhood plan area but does not want this to stifle discussion between the Parishes whose life and activity is so closely shared with Needham Market.

#### 6. Intention of Neighbourhood Area:

**Please indicate which of the following you intend to undertake within your neighbourhood area:\***

- Neighbourhood Development Plan  
 Neighbourhood Development Order

#### 7. Additional joint parish details:

**If you are applying with an adjoining parish or parishes please give the clerk's details for each parish:**

#### 8. Declaration:

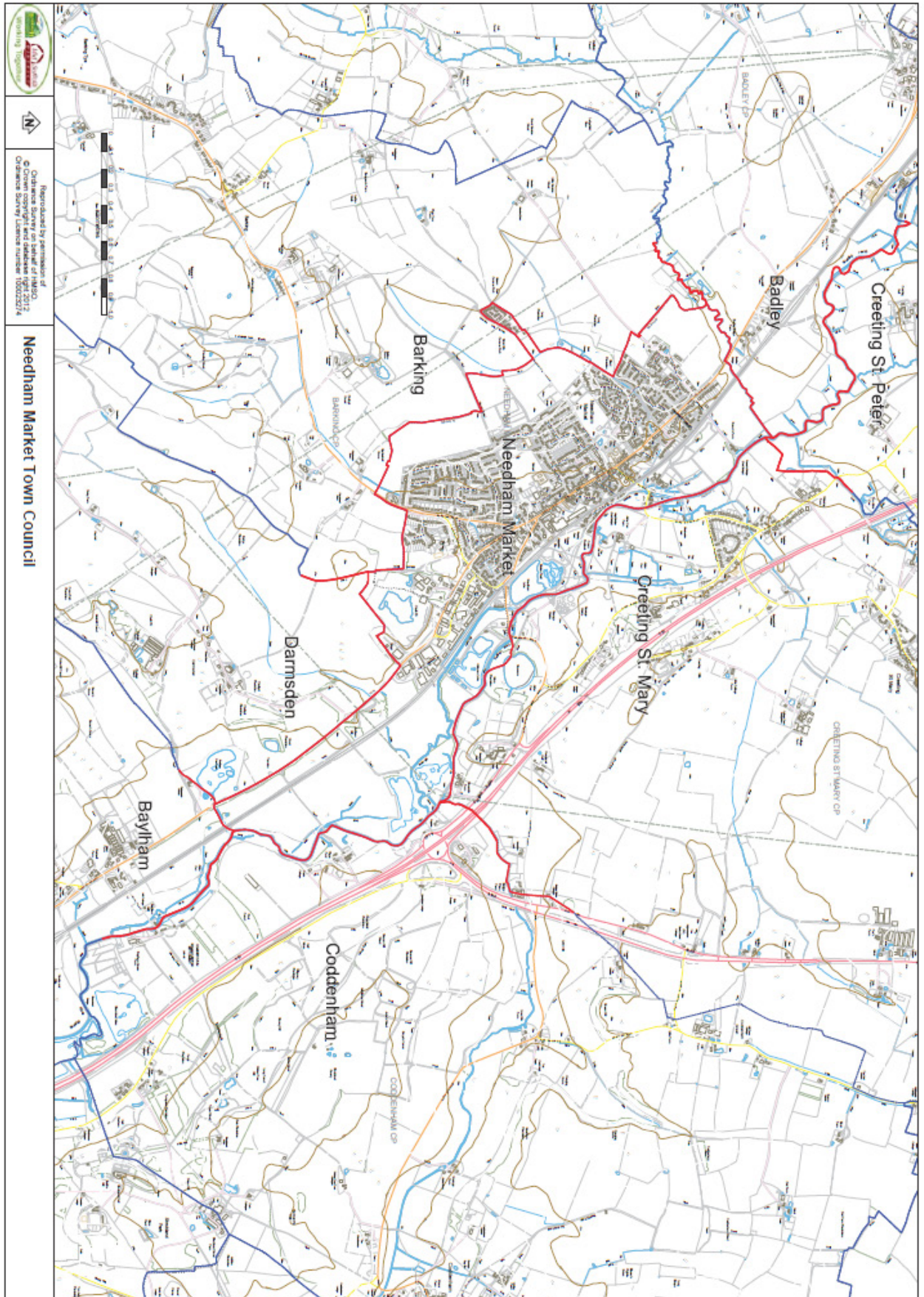
I/we hereby apply to designate a neighbourhood area as described on this form and the accompanying plan.

**Name(s)\*** Kevin Hunter, Town Clerk **Date (dd/mm/yy)\*** 05 Jun 2013

\* Indicates a mandatory field



## Map of Neighbourhood Area





## Appendix B – Decision Statement for Neighbourhood Plan Area Designation

### Place Directorate

Responsible for the Economy  
and the Environment



#### Town & Country Planning Act 1990 Neighbourhood Planning Regulations (General) Regulations 2012

Mid Suffolk District Council received from Needham Market Parish Town Council an application to designate the whole of the Parish as a Neighbourhood Area for preparing a Neighbourhood Plan.

A map identifying the designated area can be viewed at:

[www.midsuffolk.gov.uk/NeedhamMarketNP](http://www.midsuffolk.gov.uk/NeedhamMarketNP) [Nb: This link was updated in May 2019]

The submission was made under Regulation 5 of the above regulations. Comments were invited on the application between 4th July and 5pm on the 27th September 2013. As no material objections were received, the Head of Economy can designate the Neighbourhood Area through delegated powers awarded by Full Council.

Under Regulation 7 of the above regulations and following the statutory consultation period, the District Council has designated the application area as a Neighbourhood Area in preparation of a Neighbourhood Plan by Needham Market Town Council in order to facilitate the preparation of a Neighbourhood Plan by Needham Market Town Council.

Peter Burrows  
Head of Economy  
Babergh and Mid Suffolk District Council

30 September 2013

Babergh District Council  
Council Offices, Corks Lane, Hadleigh, Ipswich, IP7 6SJ  
Telephone (01473) 822801  
Facsimile (01473) 825742  
Minicom (01473) 825878  
[www.babergh.gov.uk](http://www.babergh.gov.uk)

Mid Suffolk District Council  
Council Offices, High Street, Needham Market, Ipswich, IP6 8DL  
Telephone (01449) 724500  
Facsimile (01449) 724627  
SMS Text Mobile (07827) 842833  
[www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Strategic Director (Place): Lindsay Barker  
Head of Economy: Peter Burrows Head of Environment: Chris Fry



## Appendix C - List of consultees for Pre-Submission (REG14) Consultation

MP for Central Suffolk & North Ipswich	
MP for Suffolk Coastal	
County Cllr to Bosmere Division	Suffolk County Council
Ward Cllr to Needham Market	MSDC
Ward Cllr to Needham Market	MSDC
Ward Cllr to Blakenham	MSDC
Ward Cllr to Claydon and Barham	MSDC
Ward Cllr to Combs Ford	MSDC
Parish Clerk to ...	Barking
Parish Clerk to ...	Creeting St Mary/St Peter
Parish Clerk to ...	Combs
Parish Clerk to ...	Battisford
BMSDC Community Planning	Babergh & Mid Suffolk DC
SCC Neighbourhood Planning	Suffolk County Council
Transport Policy	Suffolk County Council
Planning Obligations Manager	Suffolk County Council
HR Manager - SOR, Children and Young People	Suffolk County Council
Neighbourhood Planning Team/Planning Policy Team	West Suffolk Council
Planning Policy Team	East Suffolk Council
	The Coal Authority
Area Manager, Norfolk & Suffolk Team	Homes & Communities Agency (HCA)
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
Town Planning Team	Network Rail Infrastructure Limited
	Highways England
Stakeholders & Networks Officer	Marine Management Organisation
	Vodafone and O2 - EMF Enquiries
Corporate and Financial Affairs Department	EE
	Three
Estates Planning Support Officer	Ipswich & East Suffolk CCG & West Suffolk CCG
	Transco - National Grid
Consultant	Wood Plc (obo National Grid)
Infrastructure Planner	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
Senior Planning Manager	Sport England (East)
	Suffolk Constabulary
Senior Conservation Adviser	Suffolk Wildlife Trust
Director	Suffolk Preservation Society
	Suffolk Coalition of Disabled People
	Suffolk Preservation Society
	Landowners; owners of NDH and LGS
Community Development Officer – Rural Affordable Housing	Community Action Suffolk
Senior Manager Community Engagement	Community Action Suffolk



## Appendix D - NMNP 2nd REG14 – Response table

Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
1	General	Natural England	Natural England does not have any specific comments on this draft neighbourhood plan.	Comments noted.	No change to Plan
2	General	Historic England	<p>We welcome the production of this neighbourhood plan, but do not wish to make any comments at this time. We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: &lt;<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>&gt;.</p> <p>For further 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>	Comments noted.	No change to Plan
3	General	Suffolk Preservation Society	I am writing on behalf of the Suffolk Preservation Society (SPS), the only countywide amenity society dedicated to protecting and promoting the special historic and landscape qualities of Suffolk. We also represent the Campaign for the Protection of Rural England in Suffolk and work closely with parish and town councils and other bodies who share our objectives. As Neighbourhood Plans offer the opportunity for protecting or improving the heritage and landscape character of an area, SPS are supportive of plans being drawn up in Suffolk. We congratulate the Neighbourhood Plan team on the commitment and endeavour required to produce the draft document	Comments noted.	No change to Plan



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
4	General	Suffolk County Council	<p><b>Fire and Rescue</b></p> <p>The Suffolk Fire and Rescue Service has considered the plan and are of the opinion that, given the level of growth proposal, we do not envisage service provision will need to be made to mitigate the impact.</p> <p>It is requested that any new proposal regarding build for access or water for fire fighting provision is submitted to the Suffolk Fire and Rescue Service via the normal consultation process.</p>	Comments noted.	No change to Plan
5	General	MSDC	<p>It has been a while since this neighbourhood plan area was designated and we also acknowledge that the Town Council have continued to engage with us on various growth scenarios since then. We can also understand the Town Councils desire to have a plan in place which could always be updated and modified at a later date. We remain committed to working with the Town Council to bring forward a Neighbourhood Plan for Needham Market that works for us all.</p> <p>This Plan is well presented with a detailed introductory section, followed by topic based chapters with supporting text that leads to specific policies. We note in particular that this draft plan makes no site specific allocations. With reference to policy NM4 we suggest this may be something the Town Council wishes to address. We also provide feedback on other policies in this plan. In some cases, they are suggestions as to how policy wording could be strengthened. In other cases, we pose questions to the Town Council. We also identify some matters of factual inaccuracy.</p>	Comments noted.	Specific changes will be addressed as shown later.
6	General	MSDC	<p>This plan is well presented but opportunities exist to strengthen policy wording to ensure that they can be an effective tool in decision making. We also pose some question which seek to establish the intent of other policies as it is not immediately clear how they 'add value at the local level'.</p>	Comments noted.	Specific changes will be addressed as shown later.



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
7	Paragraph 2.25 Page 10	Suffolk County Council	The Public Transport and Access section on page 10 could include reference to Public Rights of Way and the access they provide for walking and cycling, including safe access east and west of the railway line.	Agree.	New text added to para 2.26.
8	Para 3.5 page 11	MSDC	In last sentence, figure should read 320, not 350.	Agree.	Amendment made
9	Para 3.7 Page 11	MSDC	A reminder. While there is no legal requirement to examine a Neighbourhood Plan (NP) against emerging policy, Planning Practice Guidance [Para' 009 Ref ID: 41-009-20190509] advises that the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which the Plan is tested and, that conformity with emerging plans can extend the life of neighbourhood plans, providing this does not result in conflict with adopted policies.	Noted. The policies have been drafted in the context of the emerging plan and this is referred to in the Basic Conditions Statement which accompanies the revised plan.	No change to Plan
10	Vision Page 16	Suffolk County Council	Health and Wellbeing There are four themes in relation to planning and health and wellbeing, and should be considered in the Neighbourhood Plan: - Healthy Neighbourhoods - Healthy Housing - Healthy Environment - Active Travel <i>Vision for Needham Market</i> This vision could be expanded to include an additional sentence about ' <i>promoting the health and wellbeing of local residents</i> ', given health and wellbeing are major themes referred to throughout the document.	Noted.	Wording of the vision has been amended accordingly.
11	Para 5.4 Page 17	MSDC	Add full stop after 'intent' and start news sentence with " <i>They are there ..</i> "	Agree.	Amendment made
12	Image Page 18	MSDC	Suggest label this image 'Hawks Mill' to be consistent with Historic England designation. Elsewhere in this NP, use 'Hawks Mill Street' for consistency	Noted.	Amendments to be made as appropriate
13	Para 6.1.1 Page 19	MSDC	A repeat of para 3.1. Qstn: Is this necessary?	Agree.	Paragraph 6.1.1 has been reworded.



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
14	Para 6.1.4 Page 19	MSDC	Second sentence. Should perhaps clarify that you are referring to the Babergh & Mid Suffolk Joint Local Plan (JLP) base date of 1st April 2018.	Agree.	Date added
15	Para 6.1.5 Page 20	MSDC	The 30% figure relates to Babergh. In <b>Mid Suffolk</b> , Market Towns & Urban areas will be expected to account for <b>25%</b> of the growth in the JLP period. The other figures quoted are correct. The references here to the infrastructure position do not affect Needham Markets position in the settlement hierarchy. It is identified as a Market Town in the settlement hierarchy due to the level of services and facilities which are well provided for in the town.	Agree figure needs correcting.  However the representation (and the emerging JLP) does not address why as a market town there are no additional allocations proposed for Needham Market.	Figure amended.
16	Para 6.1.7 Page 20	MSDC	Penultimate line: ? delete '10' between windfall and sites	This is a formatting/printing error relating to a footnote referred to below.	No change to Plan
17	Para 6.1.13 Page 21	MSDC	Should second sentence end "... <i>in the property open market.</i> "?	Yes agree	Amendment made





Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
18	Policy NM1 Page 22	MSDC	<p>This policy does not specify where such proposals apply. Qstn: Is it meant to apply to development proposals that come forward inside or outside of the defined settlement boundary .. or to both?</p> <p>The policy also:</p> <ul style="list-style-type: none"> <li>• concedes that not all requirements have to be met by the same site, i.e. it would be nice to have a mix, but you don't have to. If taken literally, it suggests that there is no need at all for 3-bed homes in Needham Market. Qstn: Is that really the case?</li> <li>• provides no guidance as to how it might be applied in the case of small sites (say of 5 units or less), and</li> <li>• does not explain how you would secure a 'first-time buyer'</li> </ul> <p>To strengthen the policy wording we offer alternate wording below. You may want to also address the 3-bed home issue:</p> <p><b>POLICY NM1 – Housing Mix – Size, Type and Tenure</b></p> <p><i>All new development proposals for more than 5 units shall provide for a wide range of housing types enabling a mixed and inclusive community and reflecting the local population. Unless any exceptional reason is demonstrated all housing proposals shall accord with the latest available evidence of need and the mix of housing shall include:-</i></p> <p><i>a) Housing for Older People (to include Retirement living housing, supported/ sheltered housing, bungalows and/or retirement complexes)</i></p> <p><i>b) Larger family housing (4-5 beds) - both private and affordable</i></p> <p><i>c) Smaller housing (1-2 bed homes) - both private and affordable</i></p> <p><i>d) Adaptable, 'life-time' homes</i></p> <p><i>e) Affordable housing 11</i></p> <p><i>f) Self-build<sup>12</sup></i></p> <p>In the Glossary it would be sensible that you define what is meant by (Larger) Family housing, Smaller housing (as opposed to Homes for first-time buyers) and, adaptable 'life-time' homes.</p>	<p>It should apply to all new proposed housing developments over 5 dwellings. A mix may not always be appropriate e.g. housing for older people may not be appropriate next to family housing. Sites of below 5 would not provide much of a mix in any event.</p> <p>Agree the policy requires clarification</p>	Policy wording amended



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
19	Policy NM1 Page 22	Suffolk County Council	<i>Policy NM1: Housing mix</i> – Size, Type and Tenure. The County Council supports inclusion of housing for older people and adaptable homes within this policy. This housing will be needed to address the needs of an ageing population in Needham Market.	Support noted.	No change to Plan
20	Para 6.1.7 Page 20	MSDC	Suggest deleting “ <i>of formulating their proposals</i> ” as adds little.	It is supporting text only not policy.	No change to Plan
21	Para 6.1.18	MSDC	Suggest including a date reference after mention of the Heritage & Sensitivity Assessment, i.e., ‘(March 2018)’.	Agree add date	Date added
22	Policy NM2	MSDC	<p>This is long and detailed policy. The sub-headings are helpful but Development Management Officers have commented that many of the criteria come across as generic in nature and lack clarity. For example, is there are minimum scale of development below which certain criteria do not apply? They also caution against use of the word ‘<i>should</i>’ which can also be read as ‘<i>doesn’t have to</i>’. Words like ‘<i>will</i>’ or ‘<i>shall</i>’ remove choice if that is what is intended but should also be used with care.</p> <p>The policy may benefit from a “<i>not all development proposals will need to meet all components</i>” clause which would allow flexibility to cover estate style development, flatted development and small infill development.</p> <p>Using the sub-headings for ease of reference, we make further comments below. Many are posed as questions to provoke further thinking about how these criteria might be applied in decision making.</p>	<p>‘Should’ is the past tense of ‘shall’ and therefore there is no difference in terms of their meaning. They are both auxiliary verbs. However given that planning policies are looking to the future and not the past it is agree to use ‘shall’.</p> <p>Agree that such a clause included which refers to the fact that it may not be appropriate for all proposals to meet all criteria could usefully be added.</p>	<p>Wording amended as appropriate</p> <p>Amend plan accordingly</p>



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
23	Policy NM2	MSDC	<p><b>Layout</b></p> <p>a) What is a compatible density? How far does “<i>immediate locality</i>” extend to? Perhaps better to use “<i>adjacent locality</i>”.</p> <p>b) What does ‘appropriate’ mean in this context?</p> <p>c) Maybe try: “<i>Proposals should avoid overdevelopment of a site by ensuring that a residential plot can accommodate the needs of modern dwellings including, where appropriate, a useable rear garden space that can be accessed without going through the house;</i>”</p> <p>d) How much is ‘enough’ external space?</p> <p>e) Reducing the fear of crime through good design is already a requirement of the NPPF. It might be better to say: “<i>All development proposals shall demonstrate how they have had regard to Secure by Design<sup>13</sup> in minimising the likelihood and fear of crime.</i>” The footnote should also include an URL address for any relevant website.</p>	<p>Immediate locality and appropriate – have been found to be acceptable for other plans previously examined.</p> <p>Use of ‘appropriate’ is seen as acceptable by MSDC here – contradicts advice earlier. However, agree to proposed wording.</p> <p>Agree clarity required.</p> <p>Agree.</p>	<p>Amendments to policy wording made.</p> <p>Replace ‘enough’ with ‘sufficient’</p> <p>Amend accordingly</p>
24	Policy NM2	MSDC	<p><b>Parking</b></p> <p>f) Adequate is a subjective. Why not simply say “<i>have regard to the ‘Suffolk Guidance for Parking (updated 2019)’ published by Suffolk County Council or any successor document.</i>”</p> <p>g) As above, this duplicates SCC parking standards. The criteria also fails to define what is meant here by an average sized car.</p> <p>h) How do we make a developer demonstrate that this has been considered?</p>	<p>Agree</p> <p>It is considered that the current wording is suitable.</p>	<p>Policy wording amended</p> <p>No change to Plan</p>



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
25	Policy NM2	Wildlife and Landscaping	<p>i) Where are the existing wildlife corridors? Have they been identified, assessed and mapped?</p> <p>j) A reasonable request but note that, in most cases, permission is not required for their removal.</p> <p>k) In this context, what does 'well' mean?</p> <p>l) What does significant mean in this context?</p> <p>m) How will we determine what is appropriate?, and, What 'adopted standards' are readers being referred to?</p>	<p>These are Mapped at district scale – by Suffolk County Council</p> <p>Not individually but this is to provide guidance to developers in putting together their schemes therefore you would wish them to retain as many existing trees on site as possible.</p> <p>Well done, well executed; properly done, properly implemented.</p> <p>Above the minimum requirements</p> <p>Those used by the District Council to determine applications</p>	<p>No change to Plan</p> <p>No change to Plan</p> <p>No change to Plan</p> <p>No change to Plan</p> <p>No change to Plan</p>
26	Policy NM2	Sustainability	<p>n) [no comment at this stage]</p> <p>o) Why not say: "Should a development site be located adjacent to any footway or cycle route, connections shall be secured and the design shall ensure integration with the new development."</p> <p>p) Suggest that you seek the advice of the Suffolk County Council Floods team on this. As appropriate, you may also need to clarify that this only applies to schemes of say 10 dwellings or more.</p> <p>q) Is this for every car / plot / property? What about provision of communal charging point(s)?</p> <p>r) We suggest: "include suitable infrastructure capable of allowing superfast broadband connection";</p>	<p>Agree</p> <p>Agree See SCC rep</p> <p>This allows for individual and community charging points</p> <p>Agree</p>	<p>Plan amended accordingly</p> <p>See SCC rep</p> <p>No change to Plan</p> <p>Plan amended accordingly</p>



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
27	Policy NM2 Page 23	Anglian Water	<p>The policy as drafted requires the incorporation of Sustainable Drainage Systems in new developments within the Parish.</p> <p>Anglian Water fully supports the incorporation of Sustainable Drainage Systems wherever possible to address the risk of surface water and sewer flooding and which have wider benefits including water quality.</p>	Comments noted.	No change to Plan
28	Policy NM2 Page 23	Suffolk Preservation Society	<p><b>Design</b></p> <p>We welcome policy NM2 on securing good design and layout but consider that a more comprehensive character assessment and design checklist that included detailed assessment of key features, characteristics, landscape/building character, local distinctiveness and special qualities would have made the policy more effective in delivering good design. We would recommend that this additional piece of work could be identified as a community action point that could be followed up after the adoption of the document.</p>	<p>MSDC produced a Conservation Area Appraisal for the town in 2011 which addresses a number of the points made.</p> <p>Agree that this can be identified as a project to inform next plan.</p>	Project list amended
29	Policy NM2 Page 23	Suffolk Preservation Society	<p>Policy NM2: Securing Good Design and Layout</p> <p>In order to provide further detail, the following alteration is recommended for the Sustainability section of Policy NM2:</p> <p>“p) Proposals shall include the use of above ground, open Sustainable Drainage Systems (SuDS), which could include wetland and other water features which can help reduce flood risk and whilst offering other benefits including water quality, amenity/recreational areas and biodiversity benefits;</p>	Yes agree	Plan amended accordingly



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
30	Policy NM2 Page 23	Suffolk County Council	<p><i>Policy NM2: Securing Good Design and Layout</i> It would be beneficial to add specific mention to health when considering designs. For example, provision of sufficient green spaces would promote good physical and mental health, as such it is welcome they are included in this policy. Large green spaces should be easily accessible via safe walking and cycling routes and include benches to promote accessibility to all, thereby increasing activity. The Policy could prioritise the movement of pedestrians and cyclists, which has multiple benefits including reducing congestion, reducing emissions and improving health.</p> <p>The following addition is recommended within Layout section of Policy NM2:</p> <p>“Development design and layout should prioritise the movement of pedestrians and cyclists, by providing safe, attractive and convenient links within the development and to existing pedestrian and cycle networks”</p> <p>This policy does not mention the need for appropriate facilities for young families in housing developments such as access to play areas and playing fields for children to be physically active.</p> <p>Therefore, suggested amendment to NM2 part m, is as follows;</p> <p><i>“Provision should be for an appropriate quantity and quality of green spaces, including children’s play and recreational areas, to serve the needs of the development in accordance with the latest adopted standards, particularly for young families to encourage physical activity”</i></p>	<p>Agree.</p> <p>It is considered that this would be better in the sustainability section under criterion (p).</p> <p>Agree</p>	<p>New wording has been added to paragraph 6.1.22</p> <p>Plan amended</p> <p>Plan amended accordingly</p>



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
31	Policy NM2 Page 23	Suffolk County Council	<p><i>Policy NM2: Securing Good Design and Layout:</i> SCC is in support of biodiversity policies, as part of the Greenest County Initiative<sup>4</sup>. Some amendments to Policy NM2 could make the policy more robust in terms of providing benefits to biodiversity. This would help result in an increased biodiversity network, and protection to important natural environments and green spaces.</p> <p>i) “Proposals should include features to encourage and attract wildlife <i>create net gains for biodiversity</i>, create new habitats and enhance and extend existing wildlife corridors;”</p> <p>k) “Proposals should include soft well landscaped boundary edges where adjacent to open countryside or edge of settlement, <i>which should connect to existing ecological networks;</i>”</p> <p>l) <i>Proposals should include significant landscaping areas that incorporate the use of native species in new planting which benefit pollinator species;</i>”</p>	<p>See also MSDC comments</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>	<p>Plan amended accordingly</p> <p>Plan amended accordingly</p> <p>Plan amended accordingly</p> <p>Plan amended accordingly</p>
32	Policy NM2 Page 23	Suffolk County Council	<p>The County Council supports the mention of electric vehicle charging provisions, as mentioned in Policy NM2. However, this statement could be expanded;</p> <p>“q) <i>Accessible</i> electric charging points should be provided <i>within all new development</i>”</p>	Agree.	Plan amended accordingly



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
33	Policy NM3 Page 27	Suffolk County Council	<p><b>Transport</b></p> <p><i>Policy NM3: Encouraging commercial activity and employment opportunities</i></p> <p>This policy to provide a cycleway between Lion Barn Estate and the centre of the town could be feasible, if there is sufficient highway land to widen the footway on the east side of B1113 Ipswich Road.</p> <p>There are constraints to improvements of highways, including;</p> <ul style="list-style-type: none"> <li>• insufficient carriageway width and on-street parking for cycle lane installation,</li> <li>• narrow footways that cannot be widened due to dwellings being adjacent to the back of footways,</li> <li>• insufficient carriageway width to allow footway widening etc.</li> </ul> <p>To improve any achievable cycle/footway improvements, developers would be required to provide contributions that are appropriate and proportionate to the development.</p>	Agree in part	This has been added to the text that precedes the policy as new paragraph 6.2.13
34	Policy NM3	MSDC	<p>This policy requires all news industrial / commercial development at Lion Barn to enter into a new 106 legal agreement to contribute to the construction and enhancement of the cycle path and footpath network but it <b>provides no guidance for applicants and decision makers as to how this contribution will be calculated.</b></p>	See SCC response above	No change to Plan





Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
35	Policy NM4	MSDC	<p>Policy NM4 and the preceding paragraphs refer to the Primary Shopping Area (PSA).</p> <p>A PSA was first identified in Needham Market through the 1998 Mid Suffolk Local Plan and remains in place courtesy of Saved Policy S2 (Uses Appropriate to Principal Shopping Areas). However, the Town Council should note that no such provision is made in the emerging JLP and, when that Plan is adopted, any reference to a PSA will be redundant. An opportunity therefore exists for the Town Council to establish its own PSA through this Neighbourhood Plan. Any such designation would need to be justified and should be based on the most recent understanding of property usage. The chosen area will also need to be illustrated on a suitable Ordnance Survey base map. That could be done now, or the Town Council may decide to until they undertake a review of their Neighbourhood Plan.</p> <p>Development Management colleagues have also suggested a rewording of the policy as follows:</p> <p><b><i>POLICY NM4 – Reinforcing the town centre vitality and viability</i></b></p> <p><i>In order to underpin the important function of Needham Market Town centre as a viable and attractive commercial centre, proposals for new retail A1 to A5, leisure and town centre uses will be supported within the identified Primary Shopping Area only.</i></p> <p>Development proposals that involve the change of use from Classes B1, B2 and B8 into any non-employment use outside of the identified Primary Shopping Areas will be refused.</p> <p>Finally, <b>a question:</b> Did the NP want to safeguard employment use inside the PSA? This policy does not prevent the loss of employment space in the PSA.</p>	<p>Agree to include a Map which defines the area that the policy applies to.</p> <p>The proposed wording does not take into account that conversion from offices to residential is allowed under permitted development rights and therefore permission is not required.</p> <p>The position has been overtaken by events with the changes to the Use Classes Order introduced in September 2020, which places offices and retail in the same use class (New Use Class E – Commercial Business and Services), which means that planning permission is not required to change from one to another.</p>	<p>New map included</p> <p>The policy has been updated to reflect this position and to focus on encouraging town centre uses such as commercial/business/retail uses whilst directing non-town centre uses (B2 and B8) to appropriate locations outside of the town centre.</p>



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
36	Policy NM5 Page 29	Suffolk County Council	<i>Policy NM5</i> "Proposals for the redevelopment of unused or unused underused brownfield sites"	Yes agree	Plan amended accordingly
37	Policy NM5	MSDC	<i>There is a typo in the first line. Should read "... unused or <b>underused</b> ..."</i> The requirement that " <i>parking provision should be sufficient to cater for the needs of the development .. etc.</i> " reads more as a statement than a specific policy requirement. Perhaps you may want to say: " <i>Parking provision must be sufficient to cater for the needs of the development in accordance with adopted parking guidance and should seek to avoid adverse highway impacts at peak times.</i> "	Yes agree	Plan amended accordingly
38	Paragraph 6.3.3 Page 30	Suffolk County Council	<b>Education</b> <i>Early Years Care</i> Needham Market has Early Years provisions at the Jigsaw Preschool. There is currently a deficit of -26 places, however with considerations of other pending applications, the deficit is -36 places. The County Council have asked for developer contributions towards improving early years provision in response to these applications. SCC owns the Jigsaw site, and therefore can monitor the demand for places and propose expansion if needed. The Council would expect new development to contribute to improving the provision of early years places in the town. <i>Primary Education</i> The local primary school, Bosmere CP School, had a total capacity of 315 places but a recent project has increased capacity to 360 places. When taking account of permitted development, once completed there is an expected slight surplus of capacity at the school. <i>Secondary Education</i> Stowmarket High School caters for pupils aged 11-18 and is currently being rebuilt via the Priority School Building Programme (PSBP) which is led by the Education and Skills Funding Agency. The County Council are expecting a need to expand the school to accommodate some of the expected pupils arising from existing permitted developments once they are complete	Agree.	Included in supporting text paragraphs 6.3.4 to 6.3.6.



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
39	6.3.6 page 31	Ipswich and East Suffolk CCG	<p>The CCG is aware that the service provided previously was insufficient with regards to planning ahead for growth but this is no longer the case as the CCG is now in control of all aspects of primary care health planning. The CCG consults with Babergh and Mid Suffolk District Council regularly and has created an infrastructure Delivery Plan as part of our consultation work on the Local Plan. We are aware of all of the developments proposed in the area of Needham Market and planning is underway as part of creating a primary care estates strategy. Although we are aware of the developments proposed and calculations have been done to project the number of patient increase we are anticipating, the recruitment of GPs and GP staff must coincide with any building work and this is currently a national issue. The CCG welcomes the chance to work with the Town Council on the topic of health in the town along with the district council and other healthcare providers.</p> <p>Health and wellbeing in design of communities is key to providing healthy environments in which residents have many opportunities for regular exercise. The CCG applauds the inclusion of this in the NP as it helps reinforce the preventative nature of NHS planning. It is important to also recognise that health is not just physical but mental as well and designing healthy environments should also consider this. If a community is healthier then it will put less stress on the health care facilities in the area.</p> <p>Having a slightly older population demographic does create higher pressures for healthcare providers in the area. The dementia friendly shops is a brilliant idea and we are in full support of projects that will help dementia sufferers to remain independent for as long as possible.</p>	Noted and welcomed	No change to Plan



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
40	6.3.7 page 31	Ipswich & East Suffolk CCG	Having a slightly older population demographic does create higher pressures for healthcare providers in the area. The dementia friendly shops is a brilliant idea and we are in full support of projects that will help dementia sufferers to remain independent for as long as possible.	Support noted.	No change to Plan
40	Para 6.3.17 page 33	Suffolk County Council	<i>Access to community infrastructure (section 6.3.17, p.33)</i> It is encouraging that the plan talks about the work of the Access for All group in relation to the train station, but it would be beneficial if the principle of widening access was extended to better incorporate accessibility of neighbourhoods, facilities and open spaces to all users across all ages	Agree.	New wording added to para 6.3.19 (formerly 6.3.17)
42	Policy NM6 Page 34	Suffolk County Council	<i>Policy NM6: Community Infrastructure</i> The emphasis on retaining and creating community facilities is welcome. Availability of such spaces is key to reducing social isolation and promoting mental and physical wellbeing, and the County Council agrees that it is vital any loss of existing facilities does not take place before alternative provision can be made. It is suggested that this policy could include reference to sport and recreation facilities in the first sentence alongside the list of other types of community infrastructure.	Agree.	Policy wording amended
43	Policy NM6	MSDC	Our Heritage Team note that the part of this policy which deals with the loss of existing community facilities makes no reference to buildings that may be heritage assets or, if the loss of a community building or facility would affect the setting of a heritage asset or the character and appearance of the Conservation Area. This does not appear to be an issue that has been specifically addressed in other adopted NPs which have a Community Facilities policy but is something the Town Council may want to consider	Agree.	Policy wording amended.



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
44	Natural Environment Section	MSDC	<p>There may be some overlap between paragraphs 6.4.6, 6.4.7 and Map 2 - which appear under the Natural Environment heading - and the references made in these to matters which might sit more naturally under the 'Historic Environment' heading. We are not suggesting that they should or must be moved to the Historic Environment section but this is something that the Town Council may want to consider.</p>	<p>The point is acknowledged. The text and policy here relate in the first instance to the landscape setting of the town and then considers important views which happen to be within the town and follow the themes in the Landscape and Heritage Sensitivity study which looks at transition from rural to urban. It is therefore difficult to identify the precise point at which natural environment moves into historic environment. It is proposed to retain the current structure.</p>	No change to Plan



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
45	Natural Environment Section Page 35 onwards	Suffolk County Council	<p><b>Flooding</b></p> <p>The County Council is the Lead Local Flood Authority in Suffolk (LLFA). The neighbourhood plan does not highlight all type of flood risk that affects the town and it does not reference the historical flooding that has affected the town either. The Neighbourhood Plan should mention the risks Needham Market have fluvial, pluvial and flooding from reservoir. The flood maps contained within the appendices will be out of date within the lifetime of the plan, so it is recommended that the plan states that developers should seek advice from the LLFA..</p> <p>It is suggested that the following statement is added within the Natural and Environment section:</p> <p><i>“Needham Market is predicted to be affected by a number of different flood risks and was subjected to a significant flood event in May 2012, which resulted in a detailed flood risk study by the Environment Agency which was published in 2015. Development should have regard to the Environment Agency study and any other relevant evidence. Any development within the town, should be directed away from the high flood risk areas and shall look to help reduce flood risk.”</i></p> <p>Needham Market is also within the East Suffolk Internal Drainage Board area and their role is to regulate, control and facilitate development to secure the efficient working of the drainage system, now and in the future, within their drainage district and watershed area. This is done by reasonable application of the Board’s Byelaws<sup>2</sup> and the Land Drainage Act 19913, and by working closely with Landowners, Developers, Local Planning Authorities, the Environment Agency and the Lead Local Flood Authority.</p>	Agree	New section on Floodrisk has been added to Chapter 2 at paragraph 2.2.7



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
46	Natural Environment Section Paragraph 6.4.3 Page 35	Suffolk County Council	<p>Natural Environment</p> <p>The Neighbourhood Plan for Needham Market mentions green spaces, but does not clearly state what the sites are, what makes them important, and where they are located. There is brief mention of “green spaces” and “green infrastructure” throughout the plan, and Needham Lakes and Crowley Park are mentioned only in a recreational capacity, however these sites also have a biodiversity factor.</p> <p>Therefore, within the section of Natural and Historic Environment, it is recommended that the Local Green Spaces are designated in a policy, and identified on a map, as per paragraphs 99 to 101 of the NPPF, which would therefore help to protect areas of local interest, biodiversity interest, and areas that contribute to the Health and Wellbeing of the community.</p>	<p>Crowley Park is already protected as open space in the existing Local Plan and in the emerging Local Plan. NPs should not repeat Local Plan policy or double designate. Needham Lake is already shown as a Local Nature Reserve and open space in the emerging BMSJLP. Therefore its biodiversity and recreational value to the community is already identified and protected.</p>	No change to Plan
47	Natural Environment Section Para 6.4.3 Page 35	Suffolk County Council	<p>In the environment section there could include reference to the Gipping Valley Path that provides leisure access to Alder Carr Farm and allows for river walks.</p>	Agree.	Text added to paragraph 6.4.5
48	Para 6.4.7 Page 37	MSDC	<p>On third line of opening paragraph, delete the number ‘17’ so text reads: “ ... in 2018 identifies four key views ....”</p>	<p>The number 17 is a footnote reference.</p>	No change
49	Policy NM7 Page 38 and Page 41	Suffolk County Council	<p><i>Policy NM7</i></p> <p>There are 2 policies listed as “NM7”: POLICY NM7 - Preserving the town’s setting and retention of important views. (p38) POLICY NM7 - The Historic Town Centre and Conservation Area (p41)</p>	<p>Agree this is an error and policies will be renumbered.</p>	<p>Policies renumbered accordingly</p>



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
50	Policy NM7 Page 38	Suffolk Preservation Society	<p><b>Landscape and Natural Environment</b></p> <p>We welcome policy NM7 which identifies four important views. However the policy would be further reinforced if it included an assessment of areas of local landscape sensitivity and local green spaces based upon a comprehensive landscape character assessment. The policy NM7 could be strengthened further by including management guidelines to give greater clarity and, for example, could include criteria on how urban edges are dealt with, where views could be opened up or enhanced, identification of new areas of planting, identification of landscape character which could be strengthened by the inclusion of boundaries and/or planting. The inclusion of a greater level of detail within the policy would add rigour to the policy.</p>	<p>Views are taken from the Heritage and Settlement Sensitivity Study undertaken by Place Services to support the emerging Local Plan.</p> <p>There is some further detail that could be added at 6.4.7 from the Heritage Study relating to value and key characteristics. BMSJLP already includes designated open spaces that are protected. NMNP does not need to repeat these.</p>	Additional Text added to Plan.
51	Policy NM7 Page 38	Gladman Developments	<p>This section highlights the key issues that Gladman would like to raise with regards to the content of the NMNP as currently proposed. It is considered that policy NM7 does not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend an alternative wording that should be explored prior to the Plan being submitted for Independent Examination.</p> <p><b>Policy NM7 – Preserving the town’s setting and retention of important views.</b></p> <p>This policy seeks to protect the visual scenic value of the landscape and countryside surrounding Needham Market. With the important views “into, from and within the town” protected from “inappropriate development”. The policy continues;</p> <p><b>“Development that significantly detracts from the following views (shown on Map 2), by failing to respect their distinctive characteristics, will not be supported.</b></p> <p>a) View looking north-west up the High Street.  b) View looking south-east up the High Street.  c) Short views along Hawkes Mill Street looking west towards the mill complex.</p>	Do not agree – inappropriate development would by definition be development that would not preserve the town’s setting and would detract from the views outlined.	No change to Plan





Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
51			<p><b>d) Short view along Coddendam Road looking north-west towards the mill complex.”</b></p> <p>The term ‘inappropriate development’ is not clearly defined within the policy or supporting text and therefore is overly restrictive for future otherwise acceptable development. The policy should be amended to make clear types of development acceptable and where the important views are located, if indeed they are additional to the 4 views indicated on Map 2. In its current form this policy sets out a restrictive approach towards new sustainable development opportunities rather than seeking to integrate new development within existing landscape character and setting of the area.</p> <p>Gladman consider this policy requires modification to ensure it is consistent with the provisions of the NPPF, which indicates that the planning system should recognise the character of the countryside to support thriving local communities within it. As such, this policy should therefore be modified so that applicants take account the character of the countryside within any proposals for development, rather than seeking to protect existing landscape features in order to maintain the current status quo. Such modification will help ensure regard is given towards the wider landscape, whilst ensuring new development also provides new vistas and views to the benefit of existing and future residents.</p> <p>This modification is considered necessary to ensure compliance with basic condition (a).</p> <p><b>Conclusions</b></p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the NMNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>		



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
52	Policy NM7 Page 38	Suffolk County Council	<p><i>Policy NM7: Preserving the town's setting and retention of important views.</i> The Neighbourhood Plan states in paragraph 2.2 the importance of the landscape and river valley, and that Policy NM7 recognises the value. However, this policy does not appear to do this justice, and as the only policy regarding the natural environment, it ought to be expanded.</p> <p>There is no evidence base provided to explain how the methodology for the key views are arrived at. The Neighbourhood Plan is also not clear on how the views have been designated, nor what characteristics of the town should be protected. In order to ensure the policy is effective, it should be based on clear evidence.</p>	<p>Agree.</p> <p>The views are included in the Heritage and Settlement Sensitivity Appraisals March 2018 carried out by Place Services and which supports the emerging Local Plan and which is referred to in paragraph 6.4.7</p>	Policy wording expanded to include the river valley landscape.
53	Para 6.4.10 Page 39	MSDC	<p>This section of the Plan list eleven buildings within the core of town that are described as significant. However, the list is not presented as being comprehensive and it is noted that it includes one unlisted building (Uvedale Hall), which stands outside the Conservation Area. Beyond the statement that the buildings have significance the NP is not explicit as to whether inclusion on the list is intended to enhance protection of heritage assets.</p> <p>We wonder if the NP should clarify whether it seeks enhanced protection for key buildings in the Conservation Area and/or undesignated buildings generally by giving criteria for identifying such buildings, or making a list or lists, or both.</p> <p>On a minor point, there is inconsistent use of bold font to identify individual properties.</p>	<p>Agree.</p> <p>The compilation of a List of non-designated heritage assets has been identified in the plan as a Community Action Project</p>	This section 6.4.7 to 6.4.14 has been amended. The policy will now refer to the Listed Buildings and the importance of the Conservation Area



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
54	Para 6.4.15 Page 41	MSDC	We remind you that the display of signage and advertisements is also controlled through Listed Building Consent where it would be attached to a listed building. In these cases, the impact of the signage on the significance of the listed building can also be taken into account. This paragraph does not make that clear.	Agree.	Paragraph 6.4.18 has been reworded to make this clear.
55	Policy NM7 (8) Page 41	MSDC	<p>This policy should be <b>re-numbered NM8</b> and all references to it be checked and updated accordingly.</p> <p>There are inconsistencies in use of capital letters for 'Conservation Area.' Also, references to the Conservation Area should refer to its "<i>character and appearance</i>," rather than "<i>fabric and appearance</i>," or just one of "character" or "appearance" to be in line with s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>In criteria a), by only stating "retention and maintenance", this would not cover potential harm caused to the Conservation Area through alterations, extensions etc. to these buildings.</p> <p>Criteria c) could be reworded to avoid a focus only on views</p> <p>The first paragraph after the three criteria is effectively a repeat of what is set out at the beginning.</p> <p>With regards to the penultimate paragraph, Suffolk County Council may also comment on what appears to be an overly specific requirement re archaeological assessments. With regards to approach roads, 'nature' is not defined. Do you mean character? Also, references to signage here need to be clear that this means advertising signage, as most road signage is done under Permitted Development / Deemed Advert Consent.</p> <p>Taking the above comments into consideration we suggest the following:</p>	<p>Agree to renumbering and capitalisation.</p> <p>Agree to reword.</p>	Plan amended accordingly



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
55			<p>NM8 The Historic Town Centre and Conservation Area</p> <p>Development proposals within the Historic Town Centre/Conservation Area will be supported where they respect the historic fabric and appearance of that area, its listed buildings, protected trees and other heritage assets. This will be achieved through:</p> <ul style="list-style-type: none"> <li>a) encouraging the preservation of buildings which contribute to the overall character and appearance of the Conservation Area,</li> <li>b) ensuring that new development is sympathetic to the special qualities and character of the Conservation Area through the use of appropriate, high quality materials;</li> <li>c) protecting the setting of the Conservation Area where it contributes to its character and appearance</li> </ul> <p>Furthermore:</p> <ul style="list-style-type: none"> <li>d) Proposals incorporating new below ground building works should be subject to consultation with Suffolk County Council Archaeological Service to determine whether archaeological investigation is required.</li> <li>e) Where new or reconfigured advertising signage is proposed, consideration should be given to its size, design and siting to ensure that it does not detract from the character and appearance of the Conservation Area.</li> <li>f) Proposals should seek to enhance the streetscape and public realm through appropriate use of street furniture which preserves and enhances the area will be supported.</li> </ul> <p>As appropriate, you may want to include a footnote re street furniture which could read: <i>"including, but not limited to, high quality lighting, railings, seating, litter bins, bollards, and cycle racks."</i></p> <p>Finally, <b>a question:</b> What about the protection of heritage assets that lie outside of the Conservation Area and/or town centre?</p>		



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
56	Policy NM7 Page 41	Suffolk Preservation Society	<p><b>Heritage</b></p> <p>The plan clearly identifies one of the key strengths is the surviving built heritage within a rural setting. The historic environment is important to the economic and social well-being of the town and is a defining characteristic that is well articulated in the plan. The Historic Environment Policy NM7 should ideally reflect the statutory weight that local planning authorities must give to the protection of designated and non-designated heritage assets and their setting when determining planning applications. We recommend that Policy NM7 should include reference to locally listed buildings, otherwise known as non-designated heritage assets (NDHAs) both within and outside the conservation area. We note that they are referred to in the glossary but are not referenced in the policy. These unlisted buildings, features and monument have a degree of significance meriting consideration in planning decisions.</p> <p>The National Planning Policy Framework sets out the protection given to NDHAs (para. 197) when determining planning applications that affect them. In this context it is important to note that Mid Suffolk District does not currently maintain a district-wide Local List, nor has it adopted criteria for their assessment. Therefore the production of a Neighbourhood Plan provides an ideal opportunity to assess potential list entries against the adopted criteria and create an up to date list for your towns. Historic England also advocates this approach and provides advice to local groups via its website, in particular its guidance notes <i>Neighbourhood Planning and the Historic Environment</i> and <a href="https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/">https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/</a></p> <p>We would strongly encourage your team to consider compiling such a list which will strengthen protection from demolition or harmful development within the assets' setting which may otherwise be limited. Alternatively, in view of the advanced state of the plan, a commitment to the compilation of a local list in the future, in conjunction with Mid Suffolk District Council, could be worth considering at this stage.</p>	<p>Compilation of a list of Non Designated Heritage Assets has been identified as a Community Action Project to inform the NP review.</p> <p>Addition of a new policy in respect of NDHA would require a repeat of REG14 consultation</p>	Project List amended



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
57	Policy NM7 Page 41	Suffolk County Council	<i>Policy NM7: The historic town centre and conservation area</i> The inclusion of the importance of improvements to streetscape and public realm in the Neighbourhood Plan is welcome. Lighting is important for personal safety and creating a safe environment will be key to promoting active travel. Provision of sufficient seating will be necessary when considering the needs of an ageing population.	Noted. The policy has been reworded as a consequence of MSDC representation which picks up this point.	Plan amended.
58	Policy NM7 Page 41	Suffolk County Council	Archaeology Highlighting the need for archaeological assessment in Policy NM7 is welcome. Planning applicants should seek advice from the Suffolk County Council Archaeological Service at the earliest opportunity. More information on the archaeological records within the town can be found on the Suffolk Heritage Explorer <sup>1</sup>	Noted. Policy has been reworded as a consequence of MSDC representation which picks up this point	Plan amended
59	Para 6.5.1 Page 42	MSDC	Is there a sub-heading missing before this paragraph?	Yes – it should read Transport	Amendment made
60	Paragraph 6.5.4 Page 42	Suffolk County Council	The desire to increase the attractiveness of rail and bus use in paragraph 6.5.4 is welcomed, however increasing car parking at the station does risk being counterproductive, by increasing the number of short trips into the town, contributing to congestion. The County Council would recommend the focus is placed on improving access to public transport though high-quality walking and cycling facilities and encouraging a shift towards sustainable modes of transport.	Noted. However if the intention is to encourage people to use the station for the longer part of their journey) then they will need to be able to park	No change
61	Paragraph 6.5.7 Page 43	Suffolk County Council	<i>Link Road</i> The desire for a link road across the Gipping Valley, related to concerns regarding the low rail bridge are noted. While we understand the local support for this, the County Council is not committed to this scheme at present	Agree. It is useful to put this in the supporting text so that the public are aware of the SCC position	Text added to 6.5.7



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
62	Paragraph 6.5.7 Page 44	Suffolk County Council	<p><i>Extending 20mph Limit within the Town</i></p> <p>The desire to extend the 20mph zone within the town is noted. The County Council has a set of criteria against which it assesses the suitability of roads to have a 20mph limit applied Unless in exceptional circumstances, locations will not be considered for 20mph schemes where any of the following apply:</p> <ul style="list-style-type: none"> <li>• they are on A or B class roads;</li> <li>• they have existing mean speeds above 30 mph;</li> <li>• there is no significant community support as assessed by the local County Councillor.</li> </ul> <p>Locations will then only be considered for 20 mph limits or zones if two out of three of the following criteria are met: current mean speeds are at or below 24 mph;</p> <ul style="list-style-type: none"> <li>• there is a depth of residential development and evidence of pedestrian and cyclist movements within the area;</li> <li>• there is a record of injury accidents (based on police accident data) within the area within the last five years.</li> </ul>	Agree..	Text has been added at Paragraph 6.5.8
63	Policy NM8 Page 44	MSDC	(Reducing & Managing the Impact of Traffic). <b>This is a statement, not a land-use planning policy.</b> By all means keep this within the NMNP but identify it clearly as a 'Community Action' (perhaps tied in with para 7.10 and remove all references to it as a NP Policy.	Agree.	Policy reworded to make it a land use policy.
64	Policy NM8 Page 44	Suffolk County Council	<p>Regarding Policy NM8, it is recommended that the policy should include to reference to cycle parking in the town centre and outside service locations such as the school, community centre and at the Business Park. Additionally, clear signage/marketing of cycle paths and appropriate segregation from pavements will be necessary to ensure the safety of elderly and frail pedestrians. Therefore, the following amendment is suggested;</p> <p><i>"b) the delivery of on clearly marked street cycling and walking facilities and the provision of cycle parking in the town centre, that favour young families and older people and that offers good access."</i></p>	Agree this point needs covering however it is considered it is more relevant for Policy NM9 in the Reg14 version of the Plan (now Policy NM10).	Plan amended accordingly.



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
65	Policies NM8 and NM9 Page 44-45	Suffolk County Council	<i>Sustainable transport</i> The transport Policies NM8 and NM9, with the efforts to increase modal shift away from car usage, and towards more sustainable modes of transport, such as walking and cycling, is welcome. The congestion and traffic issues highlighted throughout the neighbourhood plan in Needham Market are noted. With growth in Ipswich, Babergh, Mid Suffolk and Suffolk Coastal (collectively referred to as the Ipswich Strategic Planning Area) will continue to place pressure on the highway network if not appropriately mitigated	Comments Noted.	No change to Plan
66	Paragraph 6.59 page 45	Suffolk County Council	<b>Public Rights of Way</b> The Plan would benefit from some reference to the Public Right of Way (PRoW) network. PRoW provide access to the countryside, connects together communities and provides opportunities for exercise and benefits to health.  The commitment to improve access to the countryside from the town is supported. As the Highway Authority, Suffolk County Council has the powers to create new PRoW routes, including footpaths. The PRoW team is also engaged with the development management process to gain enhancements to the network where possible. As such, it is recommended that 6.5.9 is amended as below:  <i>“Additionally, the Town Council will strive to improve routes between the town centre and the countryside, whether through maintaining and expanding existing links or working in partnership with the District Council, developers and the Suffolk County Council Public Rights of Way and Access Team to create new ones.”</i>	Agree.  Agree.	Reference to PROW has already been added at paragraphs 2.26 and 6.4.5.  Amendments to new paragraph 6.5.11.





Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
67	Policy NM9 Page 45	Suffolk County Council	Policy NM9 could be amended to include Public Rights of Way in addition to the reference to footways and cycleways. This will contribute towards the objective of improving access to the countryside. The following amendment to policy NM9 is proposed: <i>“Development should preserve existing Public Rights of Way and where possible enhance Public Rights of Way through the improvement of existing routes, or the creation of new routes and connections.”</i>	Agree. (Policy is now NM10)	Plan amended accordingly
68	Policy NM9 Page 45	MSDC	This, in part, sort of repeats the requirement in Policy NM2 part o)	Agree	Both references have been reworded.
69	Page 46 Image	MSDC	Images often convey more than any text could and can be helpful in articulating aspects of any plan. They should therefore be used wisely. The image used on this page gives the impression that all of these people are waiting for a normal commuter train. On closer inspection, that is perhaps not the case. If so, it should be made clear that this image represent a special event, or, you use a more appropriate image.	New photograph of Station sought.	New photograph added



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
70	Other Issues	Environment Agency	See below	The majority of the representation repeats national standing advice.	Text relating to the issue of flood risk has been added in Chapter 2 at paragraph 2.27.

### Flood Risk

Although we note that there is a Flood Map contained within the appendices, it is disappointing that the flood risk to Needham Market is not referenced within the Neighbourhood Plan document. Needham market is at fluvial flood risk from the River Gipping.

The River Gipping is currently being re-modelled; modelling involves simulating the course of the river using computer software. The results of this modelling exercise will be released and is expected to be available later this year. There are also two ordinary watercourses; Orchardgate watercourse and Lion Barn drain. Both are classed as Main Rivers within the catchment. We have not modelled these watercourses and the flood risk from these sources currently remains unknown, this should be investigated during the development management process for any planned schemes within the flood zones of these rivers. In all cases, where possible, we would expect to see development sequential sited away from flood risk areas. This should consider the impacts of climate change to these watercourses. Should any new development be sited within the floodplain consideration should be given to our general flood risk guidance below.

**Flood risk Guidance** All development proposals within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment.

### Planning Practice Guidance (PPG)

The Neighbourhood Plan should apply the sequential test and use a risk based approach to determine the location of development. The plan should be supported by the local Strategic Flood risk Assessment (SFRA) and should use the NPPF Planning Practice Guidance (PPG). The PPG advises how planning can take account of the risks associated with flooding and coastal change in plan-making and the planning application process. The following advice could be considered when compiling the Neighbourhood Plan to ensure potential development is sequentially sited or if at flood risk it is designed to be safe and sustainable into the future.

### Sequential Approach

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it isn't possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Cont/d.. 3

Zone 3), an FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

### Finished Floor Levels

We strongly advise that Proposals for 'more vulnerable' development should include floor levels set no lower than 300 mm above the level of any flooding that would occur if defences were overtopped in a 1% / 0.5% flood event (including allowances for climate change). Safe refuge should also be provided above the 0.1% undefended/ breach flood level (including allowances for climate change). We are likely to raise an objection where these requirements are not achieved.

We recommend 'less vulnerable' development also meets this requirement to minimize disruption and costs in a flood event. If this is not achievable then it is recommended that a place of refuge is provided above the 0.1% flood level (including allowances for climate change). Where safety is reliant on refuge it is important that the building is structurally resilient to withstand the pressures and forces (hydrostatic & hydrodynamic) associated with flood water. The LPA may need to receive supporting information and calculations to provide certainty that the buildings will be constructed to withstand these water pressures.

### Safe Access

During a flood, the journey to safe, dry areas completely outside the 1% (1 in 100) / 0.5% (1 in 200) AEP flood event, including allowances for climate change, should not involve crossing areas of potentially fast flowing water. Those venturing out on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including, for example; unmarked drops, or access chambers where the cover has been swept away. Safe access and egress routes should be assessed in accordance with the guidance document 'FD2320 (Flood Risk Assessment Guidance for New Developments)'.

### Emergency Flood Plan

Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. As stated above refuge should ideally be located 300mm above the 0.1% AEP flood level including allowances for climate change. An emergency flood plan should be submitted as part of a FRA for any new development and it will be important to ensure emergency planning considerations and requirements are used to inform it.

### Flood Resilience / Resistance Measures

To minimise the disruption and cost implications of a flood event we encourage development to incorporate flood resilience/resistance measures up to the extreme 0.1% AEP climate change flood level. Information on preparing



property for flooding can be found in the documents 'Improving the Flood performance of new buildings' and 'Prepare your property for flooding'.

### **Increases in Built Footprint**

When developing in areas at risk of flooding consideration should be given to preventing the loss of floodplain storage. Any increase in built footprint within the 1% AEP, including allowances for climate change, flood extent will need to be directly compensated for to prevent a loss of floodplain storage. If there are no available areas for compensation above the design flood level and compensation will not be possible then a calculation of the offsite flood risk impacts will need to be undertaken. If this shows significant offsite impacts then no increases in built footprint will be allowed. Further guidance on the provision of compensatory flood storage is provided in section A3.3.10 of the CIRIA document C624.

### **Climate Change**

The Environment Agency guidance 'Flood risk assessments: climate change allowances' should be used to inform the spatial distribution of growth and the requirements of Flood Risk Assessments (FRA) for individual applications. The National Planning Practice Guidance provides advice on what is considered to be the lifetime of the development in the context of flood risk and coastal change. The 'Flood risk assessments: climate change allowances' guidance provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. For some development types and locations, it is important to assess a range of risk using more than one allowance.

Please refer to this guidance. <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. This advice updates previous climate change allowances to support NPPF and may result in flood extents being greater than they have been in the past. This does not mean out flood map for planning has changed, as these maps do not consider climate change, but fluvial flood maps that may have been produced as part of SFRA's and other flood risk studies may be out of date. FRA's submitted in support of new development will need to consider the latest climate change allowances. Environmental Permit for Flood Risk Activities An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

The Neighbourhood Plan should consider this when allocating development sites adjacent to a 'main river'. A permit may be required and restrictions imposed upon the work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk.

### **Water Quality**

The plan should consider impacts upon water quality brought about by development: consideration should be given to preserving and enhancing the water quality in the local area. Connecting all properties to the mains sewerage system as the preferred option will enhance water quality as this follows the drainage hierarchy. This seeks to treat foul water at a water recycling centre and to steer developers away from less environmentally beneficial forms of disposal such as septic tanks and cess pits. Further benefits to the water environment can be achieved by; reducing misconnections to the surface water system; reducing contaminated surface water run-off and reducing spills of pollutants. All of these approaches could all help to enhance the natural environment. End 5

### **Fisheries, Biodiversity and Geomorphology**

The sensitive and relevant natural habitats/features seem to be well summarised within section 6.4 of the plan. Policy objective 4 also aims to: protect and enhance Needham Market's environmental, natural and green assets. We welcome the efforts to; improve the natural environment, connect areas of woodland, improve green corridors and promote planting within new developments. We would encourage any planting is made up of UK grown native species to avoid the risk of the spread of disease. Also simple things like the provision of 'hedgehog holes' in garden fences enable wildlife to increase their range and access the garden green space.

### **Local Waste Facilities**

We note the references to waste facilities; Stowmarket HWRC operate from an area of land at Old Bury Road, Stowmarket, which is subject to the conditions specified in their Waste Management Licence. The licence specifies a maximum quantity of 7,500 Tonnes of waste per annum, exceeding this maximum limit would be a breach of the licence and therefore an offence. If the site is likely to run over capacity or change location they would need to amend their licence or apply for a new permit.

### **Informatives**

Please note that the view expressed in this letter is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications which may come forward. We reserve the right to change our position in relation to any such application. Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
71	Other issues	Suffolk County Council	<p><i>Minerals Resource Safeguarding</i></p> <p>Minerals resources in Suffolk consist primarily of sand and gravel, used for aggregates. Policies are in place in both the Minerals Core Strategy and SMWLP which protect minerals resources from been made unnecessarily made inaccessible (sterilised) by development. This is done through the Minerals Consultation Areas (MCA), which indicate locations of potential mineral resources, based on data from the British Geological Survey. Large areas of Needham Market are within the MCA of both the Minerals Core Strategy and SMWLP, including the site allocated through policy GB3.</p> <p>As a result, as part of future planning application on this site, SCC may request that the minerals resource on the site is assessed, to identify if the resource is of good quality and can be extracted prior to development of the site, or some of the material can be used within the construction of the development. Development proposals immediately adjacent to residential areas are less likely to be suitable for prior extraction, however it does depend on the circumstances of the site.</p> <p>Use of material within the development can bring benefits during construction, such as using the mineral on site means that less is required to be brought to the site, which could reduce construction traffic. This does not necessarily require any change to policies in the plan.</p>	The NMNP is not making any allocations – this site is in the BMSJLP. The wording might be better included in the BMSJLP	No change to Plan
72	Other issues	Suffolk County Council	<p><i>Waste Facility Safeguarding</i></p> <p>There are two waste facilities within the Neighbourhood Plan area. One is the Debrac Centre, a waste transfer station, at the southern end of the town on the south side of the B1113 and the other is an inert landfill site at Gallows Hill. Policies in the Waste Core Strategy and the SMWLP protect waste sites from being prejudiced by new development. Gallows Hill is some distance (over 500m) from the built-up area of the village and as such it is not expected to be prejudiced by proposals in the neighbourhood plan. The Debrac Centre is closer to an already permitted housing site (former chalk quarry), however should further development occur within 250m of this site, development will need to demonstrate that the operation of the site will not be prejudiced.</p>	The NMNP is not making any allocations – this site is in the BMSJLP. The wording might be better included in the BMSJLP	No change to Plan



Serial	Paragraph or Policy Number	Respondent	Response	Town Council Response to Comment/Action	Action
73	Appendix A – Policies Map	MSDC	<p>What is shown here is not a Policies Map. The Town &amp; Country Planning (Local Planning) (England) Regulations 2012 (Part 4, para 9) defines a policies map as:</p> <p><i>9.-(1) The adopted policies map must be comprised of or contain a map of the local planning authorities area which must:</i></p> <p><i>(a) be reproduced from or be based on an Ordnance Survey Map</i></p> <p><i>(b) include an explanation of any symbol or notation which it uses; and</i></p> <p><i>(c) illustrate geographically the application of the policies in the adopted development plan</i></p> <p><i>(2) Where the adopted policies map consists of text and maps, the text prevails if the map and text conflict</i></p> <p>By default, a Neighbourhood Plan Policies Map should show the whole of the designated area and identify all relevant properties, sites or areas which are subject to policies within that Plan, e.g., the Primary Shopping Area idea we discuss under NM4 above. There are plenty of good examples in other Neighbourhood Plans published on the B&amp;MSDC website.</p>	Agreed. This was an error. Policy map to be included.	Policy Map included
74	Policies Map	Suffolk County Council	<p><i>Policy Map</i> The existing diagram in Appendix A listed as the Policy Map is just a repeat of the Structure of Needham Market Neighbourhood Plan diagram from p16. A Policy Map is a map that spatially expresses the extent and effects of policy, rather than an outline of how the vision, objectives and policies are structured within the document.</p> <p>Therefore, the Neighbourhood Plan needs to create a Policy Map, which should display all of the proposed policies in one clear consolidated image, such as designated Local Green Spaces, important community facilities and services, significant views, and upcoming development sites that are all contained within the designated parish boundary. A number of adopted local plans within the district contain policies maps, which provide examples.</p>	Agreed. This was an error. Policy map to be included.	Policy Map included



## Appendix E – 2nd REG14 Consultation - Responses from the Local Community

Serial (Anonymised for Data Protection)	Paragraph or Policy Number	Response	Town Council Response to Comment/Action
1	General	I simply applaud the presentation of the information and the opportunity to be consulted rather than dictated to	Support noted. No change to Plan
2	General	A solution for an improved link between the B1113 and the A14 is required associated with a 'bypass' around the entire town – conversely the poor link to the A14 should be welcomed if it helps constrain housing growth	Comments noted.
3	General	Apart from references to their failures, where is Mid Suffolk District Council's presence?	The NDP is led by the Town Council not the District Council .
4	General	Can the information/detail in the study report be relied upon?	Noted
5	General	The suggested growth in population and social housing will introduce new residents from outside the local area and thereby destroy local identity.	Comments noted however, new housing provides opportunities for current residents to change their housing to meet their needs e.g. downsizing for older people, releasing housing for families. It also allows for those who wish to live closer to their relatives or have a local connection to the town to move back. New housing does not historically just attract new people to an area. There is a balance.
6	General	Overall positive and the most recent information in the Town Council Newsletters welcomed	Support welcomed
7	General	An instantly recognisable part of the Newsletter dedicated to the Neighbourhood Plan is needed.	Comments noted



Serial (Anonymised for Data Protection)	Paragraph or Policy Number	Response	Town Council Response to Comment/Action
8	General	A public presentation event would be helpful	The REG14 consultation was preceded by the two day drop in event which was open to the public.
9	General	Keeping the Town Council website up-to-date on this issue is vital.  Device further methods for encouraging community involvement.	Comments noted
10	General	Ipswich Road end of town needs more facilities including litter bins and pavement needs to be cleared of overgrowth	Comments noted. Issue for the TC to consider.
11	General	A simple overview of the benefits of the proposal would be helpful for those who cannot understand it in any depth.	Comments believed to relate to the Relief Road and not the NDP
12	General	Flood maps need to be up to date (can't rely on SCC for this when assessing development proposals	A new section on Flood risk has been included at the request of the Environment Agency.
13	General	No mention of allotments	Noted. There has been no need identified through the consultation to date however it can be kept under review.
14	General	Where will all the new residents in the town work?	See above, Not all new houses will necessarily be occupied by new residents. Some new residents may also already work in the town and the Plan makes provision for new business expansion
15	General	People have moved into Needham Market to live in the country but that future is now in doubt.	Noted
16	6.1 Housing	Why cannot growth of the town be managed on an incremental/organic approach?	The Town Council have taken the view not to allocate any additional housing sites during this plan period given the outstanding commitment and to allow for the town to manage its growth sustainably.



Serial (Anonymised for Data Protection)	Paragraph or Policy Number	Response	Town Council Response to Comment/Action
17	6.1 Housing	The proposal is focussed on new housing development dressed up as a Relief Road project.	Noted.
18	6.1 Housing	The project, even at this stage, creates a huge risk of immediately exposing the town to developers as a place to come and simply build new houses	Noted.
19	6.1 Housing	Housing numbers are out of date as Brexit will hugely reduce immigration	Noted. Housing calculations are those from MSDC, which will be annually monitored.
20	6.1 Housing	Housing growth numbers in plan need to be stated more clearly	Agree that the housing section could benefit from some clarification. Amendments have been made to paragraph 6.1.1
21	6.1 Housing	Can the Town Council be trusted to preserve the High Street when it did not object to the development proposed at the former Turners Showroom site	Noted.
22	6.1 Housing	Is the risk of flooding from new housing development mitigated?	A new section on Floodrisk has been added at 2.27. There are no new allocations in this plan and the sites referred to now all have permission.
23	NM1	Affordable housing should be integrated with other development and not developed on one cramped site – Policy NM1 ‘mixed and inclusive community’ should be articulated more robustly	Agree. The location of the affordable housing required on larger sites will largely be governed by the policy of the relevant housing association. Some prefer a ‘pepper potted’ approach and others prefer to manage their housing in groups.
24	Policy NM1	Housing development and property prices need together to be realistic to deliver affordability	Noted
25	Policy NM1	Can Affordable Housing in future development be prioritised for local young people?	Noted. This issue would need to be addressed by the Housing Team at MSDC





Serial (Anonymised for Data Protection)	Paragraph or Policy Number	Response	Town Council Response to Comment/Action
26	Policy NM1	What will be the balance within new housing development between affordable and market homes as the latter are needed to introduce more wealth into the town?	The emerging BMSJLP includes a figure of 35% affordable housing on qualifying sites.
27	Policy NM2	Doesn't include sustainability	The policy includes a section on Sustainability which has been amended as a consequence of other representations.
28	Policy NM2	New build homes oriented to maximise solar gain to replace traditional gas/oil and aim for zero CO2 emissions Will the Relief Road add to air pollution particularly for residents living closest to it?	This issue will need addressing when the relief road proposal comes forward.
29	Para 6.1.3	The proposal doesn't answer the many questions residents have regarding the District Council's proposals for their former office and former Middle School sites	Both sites have the benefit of planning permission. References: DC/18/04811 and DC/18/05104
30	Policy NM3	How will traffic movements created by Lion Barn Industrial Estate and its continued expansion be cohesively linked to the Relief Road?	This issue will need investigating as the relief road proposal comes forward.
31	6.2 Employment and Business	How can the proposal be used to enhance Needham Market and evolve it into a key 'destination' for visitors?	Noted.
32	6.2 Employment and Business	A high-tech centralised health facility is needed for the town.	Noted. There is an existing allocation for new employment development at Lion Barn which could include B1 uses if the need were identified.
33	Policy NM4 Town Centre	There should be a pharmacy on the High Street	Comments noted. The policy supports such uses in the town centre



Serial (Anonymised for Data Protection)	Paragraph or Policy Number	Response	Town Council Response to Comment/Action
34	6.3 Infrastructure	Will the proposal deliver much needed facilities for children and young people?	Policy NM6 specifically refers to the needs of young people.
35	6.3 Infrastructure	The level of additional healthcare resources shown in the study report is insufficient	Noted. Policy NM6 refers to support for expanding the existing health care provision
36	Policy NM6	The number of GP's at the Needham Market Country Practice needs increasing	Noted. Policy NM6 refers to support for expanding the existing health care provision
37	6.3 Infrastructure	Leisure facilities to encourage good health should be highlighted	Noted. Policy NM6 refers to support for a wide range of activities and facilities including for young people
38	Policy NM6	Policy NM6 c) – alternative provision timescale must not be left open-ended	This is an important point. Alternative provision will need to be secured first.
39	6.4 Natural Environment Section	Concerns relating to preservation of green space and inherent wildlife (specifically the land r/o Chainhouse Road)	Comments noted. The area is not currently protected by any formal designation relating to wildlife.
40	6.4 Natural Environment	Noise and light pollution should be minimised	Comments noted
41	6.4 Natural Environment	View SW from Burial Ground (Barretts Lane) is important Will the former NM Middle School playing field stay as green space?	The former Middle School Playing fields are not part of the allocation/permission as shown in the emerging Local Plan.
42	6.5 Transport	Will train services be enhanced as the town grows?	This will be a matter for the relevant train operator to determine.
43	6.5 Transport	Why is the old car showroom site in the High Street not referred to as a much needed potential additional parking area for shoppers/visitors?	This site has the benefit of planning permission for a residential dwelling and is therefore not available for public parking.
44	6.5 Transport	The car parking facility at the railway station will need to be expanded	The plan would support the expansion of the railway station car park.



Serial (Anonymised for Data Protection)	Paragraph or Policy Number	Response	Town Council Response to Comment/Action
45	Policy NM9	Safe cycling routes are essential	Agreed. The policy seeks to enhance the provision in the town
46	6.5 Transport	Junction of The Causeway with the High Street – angle of pavement causes problems for buggies, prams etc plus generally narrow pavements etc. in the vicinity	Noted. This issue can be kept under review by the Town Council.
47	6.5 Transport	Car parking provision needs to respond to loss of Hurstlea Road car park and imminent change to Parking Enforcement	Noted. Car parking provision in the town is kept under review.
48	6.5 Transport	Any additional car parking facilities in the town should be free – local businesses rely on it	Noted.
49	6.5 Transport	A policy to tackle the problem/issue of traffic in the High Street is needed	Noted. This was one of the key drivers for the Town Council investigating the potential for the relief road.
50	6.5 Transport	Car usage could be reduced by having a larger supermarket in the town	Noted. Town centre sites are currently limited but the NDP policies would support additional retail in the town centre
51	6.5 Transport	Around the town Bus routes need to be reintroduced	Noted. This may be an issue investigated as part of the relief road coming forward.
52	6.5 Transport	Access to Saxon Park by mobility scooter should be improved	Noted.
53	6.5 Transport	Traffic lights at the Coddendam Road railway bridge are needed particularly now there is to be a Visitor Centre at the Lake	Noted. The bridge is of particular concern to the Town Council who have keeping the position under review
54	Relief Road/ Master Plan	What will the Relief Road junctions with the B1078 and B1113 look like?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.



Serial (Anonymised for Data Protection)	Paragraph or Policy Number	Response	Town Council Response to Comment/Action
55	Relief Road/ Master Plan	Will there be a Vehicle Weight Limit on the Relief Road?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
56	Relief Road/ Transport	What will be the solution for controlling traffic speed on the B1078?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
57	Relief Road/ Transport	Where will public transport be routed and what will it consist of?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
58	Relief Road/ Transport	How will future congestion of the High Street be resolved?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
59	Relief Road/ Transport	When will relevant traffic surveys be carried out?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
60	Relief Road/ Transport	Will the Relief Road make the B1078 a more attractive 'through route' for traffic from the Sudbury/Lavenham direction?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
61	Relief Road/ Transport	Will there be traffic calming on the Relief Road?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
62	Relief Road/ Transport	Is there a risk existing roads in the town could be used as 'rat runs' (in particular Chainhouse Road which is inundated by cars parking)?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
63	Relief Road/ Transport	Due to undulation, will noise from heavy traffic using the Relief Road be a nuisance?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.



Serial (Anonymised for Data Protection)	Paragraph or Policy Number	Response	Town Council Response to Comment/Action
64	Relief Road	Might a Relief Road not damage High Street businesses by taking traffic away from the core of the town?	Noted. There will be a balance between relieving congestion in the town centre and the impact that re-routing traffic away from the town centre may have on town centre viability
65	Relief Road/ Transport	Might a Relief Road not damage High Street businesses by taking traffic away from the core of the town?	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
66	Relief Road	The proposal doesn't indicate an existing appraisal of all the land in scope of the feasibility study area.	Noted. Specific details such as this would need to be addressed in the future by detailed proposals for any relief road.
67	Relief Road /Master Plan	Is the Primary School in the proposal additional to Bosmere Primary School? Why is there no new High School in the proposal?	The school shown as part of the relief road/masterplan would be in addition to existing provision. The provision of a high school would be for SCC to identify the need.
68	Relief Road /Master Plan	The location and thereby accessibility of any new Health facility is crucial.	Noted. The NDP policies would support new facilities.
69	Relief Road/ Transport	The relief road proposal is based on a concept but when will it become the Town Plan?	The relief road concept will require further work and this will inform the next Neighbourhood Plan.
70	Relief Road/ Transport	Why does the relief road proposal not include the remaining South/East areas of the town?	The relief road concept will require further work and this will inform the next Neighbourhood Plan.
71	Relief Road/ Transport	Will the benefits from the Relief Road concept only be delivered when the entire road is complete?	Noted. Further detailed work on this issue will be required
72	Relief Road	Will the proposal not mean the loss of green space and through that have a major impact on established and varied wildlife?	Noted. Further detailed work on this issue will be required





**GET  
NEEDHAM  
MARKET  
NEIGHBOURHOOD  
PLAN  
DONE**

**Community Consultation  
Needham Market Community Centre  
17th and 18th January**

