

Hoxne Neighbourhood Development Plan

Supporting Document 2A

Regulation 14 Consultation – comments by chapter and policy and proposed response

Summary of On-line Responses

32 people completed at least some of the on line survey. The table below summarises the responses by Policy and also reports specific suggestions with responses and proposed amendments.

Plan Policy	Suggested Response	Proposed Amendment
Policy 1 – Settlement Boundary - 80% of respondents supported the settlement boundaries. Most specific comments wanted no development outside the settlement boundaries.	No change – the policy must allow for development outside of the settlement boundary to be considered to conform to national planning policy.	No amendment
Policy 2 – Heritage Assets – all respondents supported this policy. One respondent is concerned about the lack of reference to Green Street.	It would be consistent with the use of Cross Street/Heckfield Green to refer to Low Street/Green Street throughout.	Amend plan throughout to refer to Low Street/Green Street.
Policy 3 – Design – this was supported by 96% of respondents. Some concerns were expressed about car parking and traffic but no specific suggestions about changes were made.	Noted	No amendment
Policy 5 – Local Green Spaces – 92% supported this policy. There were some specific suggestions about new LGS:		
Why no LGS for Green Street – eg Watermill Lane, the Church Yard	All possible LGS were assessed. No areas that meet the definition or aren't otherwise protected in the Green Street area	No amendment
Open Space Areas which segregate Abbey Hill/Cross Street and Low Street should be protected	This area does not meet the definition of LGS but is protected in other ways – settlement boundary, key views, special landscape area	No amendment

Open space between Abbey Hill and Goldbrook should be included	As above	No amendment
Watermill Lane, the area around the Mill and River should be protected because of its beauty and wildlife	This area does not meet the definition of LGS	No amendment
There was no specific question about Key views but one comments was made::		
Misses Key view from Green Street towards the church.	View number 1 is from Green Street towards the church: '1) View towards the Church and Vicarage (formerly a moated hall complex) which being sited on a ridge are visible from a significant distance.'	No amendment
Policy 6 – Landscape – this was supported by 92%. Comments supported the separation between the two parts of the village others were concerned about the effect of the development proposals on the landscape	No specific suggestions for changes	No amendment
Policy 9 – Sustainable Construction – 83% supported this policy.	No specific suggestions were made for change.	No amendment
Policies 10, 11 and 12 – Housing - 58% supported the proposals for housing development while 33% disagreed and 8% were undecided. Specific concerns were the quantity of development proposed, the concentration of sites in one area, their distance from amenities, the need for the number of homes suitable for older people and the increase in traffic through the village.	The number of homes proposed has been guided by the support for housing needs to be met and the sites were selected following an assessment of all promoted sites looking at the balance of benefits and disbenefits. The allocation of housing sites cannot be made on the basis of fair shares. While it is important that the need for affordable homes is met locally it is acknowledged that the need for homes suitable for older people is more difficult to judge because much of the requirement would be more suitable in nearby towns. The draft plan	The requirement of about 10 homes suitable for older people on each site should be reduced to 7 such homes on each site.

	proposed that 10 homes suitable for older people should be provided on each site against a requirement of up to 38 homes. Given the lack of facilities in Hoxne 20 homes might be excessive so this element of the allocation will be reduced.	
Policy 13 – Shreeves Farm – 65% of respondents supported the allocation of this site. The comments were similar to those summarised above. Denham Parish Council wanted access to the site to come from Denham Low Road	See above Denham Low Road is not suitable to serve Shreeves Farm as well as Denham Low Road sites	See above No amendment
Policy 14 – Denham Low Road – 67% supported this allocation. Similar comments were made to those summarised above.	See above	See above
Policy 15 – Abbey Farm - There was support for the Abbey Farm business policy (15), including from the owner, with 74% supporting it.	Noted	No amendment.
Community Policy A – Traffic Management - was strongly supported with 96% in favour.	Noted	No amendment
Community Policy B Quiet Lanes had only 62% in favour (21% were undecided) with the main concern being traffic displacement as a result of introduction of quiet lanes.	Designation as a quiet land does not mean traffic cannot use the highway only that drivers should more be aware of other road users	No amendment

Other Comments on the Plan by Section/Policy

Plan Section/Policy	Response	Proposed Amendment
<u>General Comments</u>		
The Trust acknowledges that the Neighbourhood Development Plan (“the plan”) is a way for the local	Comment welcome	N/A

<p>community to decide where and what type of development should take place. It is in the school's interests for the village to thrive and to be a place where families with young children are able and willing to live. (School)</p>		
<p>We would suggest that the text in the key/Legend of Figure 4 (and any other map) is made large enough to read. (Historic England)</p>	<p>Accepted – maps will be made more legible</p>	<p>Amend maps to improve legibility</p>
<p>We welcome the consideration for archaeological heritage that is a thread in the plan. Document 6, Archaeology section - this is a nice summary, highlighting important aspects of the history of the village. It could also include a link to the Suffolk Heritage Explorer, if the author wants to add one. (SCC)</p>	<p>Comment welcome</p>	<p>Add link to Suffolk Heritage Explorer</p>
<p>(Re the Shreeves Farm site) This is an ambitious plan for the parish. Whilst the landowners are fully in support of this we should not lose sight of the need for development to be viable and deliverable. The plan could do more to recognise that the potential technical and physical constraints of the sites are as yet unknown, and should allow the flexibility for the developers to mitigate these as part of their delivery strategy. Not least, green space, open space, Sustainable Urban Drainage Systems, school playing fields and buffer zones will all need to be delivered in conjunction with each other and within the technical constraints of the site, the policy should not limit these elements from converging, limit the flexibility for these to be apportioned correctly through the plan, or seek to unnecessarily restrict opportunities to respond to market demand and, in doing so, maximises the benefits extracted from the site for the wider community. To progress the plan without addressing the matters raised in this email risks making development undeliverable which, in turn, delivers no wider benefits to the Parish.</p>	<p>The Plan properly sets out the requirements for the development of the site. When planning applications are considered other material considerations including viability will be taken into account. See also proposed amendment reducing the requirement for homes suitable for older people proposed above which will increase flexibility.</p>	<p>No amendment but see amendment to reduce requirement for homes suitable for older people on the Shreeves Farm site from 10 to 7.</p>

<p>I stress again that, in making this representation the intention of the Havers family is not to trying to reduce the level of benefit the Shreeves Farm site can deliver to the wider village, but to ensure that the aspirations of the plan are deliverable and realistic – something which can only happen if the policy recognises the importance of enabling viable market housing schemes. If the Neighbourhood Plan Team would find it helpful to discuss any of the issues raised in this email, I would be happy to meet and discuss further.</p>		
<p>It's an excellent piece of work and I think the Parish Council are to be congratulated.</p>	<p>Comments welcome</p>	<p>N/A</p>
<p>No comment (Highways England)</p>	<p>Noted</p>	<p>N/A</p>
<p>Natural England does not have any specific comments on this draft Regulation 14 Consultation.</p>	<p>Noted</p>	<p>N/A</p>
<p>Having reviewed the supporting documentation in respect of Hoxne Parish Council's Neighbourhood Development Plan 2022-2037 there is one area of interest for the MOD. The specific interest the MOD have in the plan area is a new technical asset known as the East 2 WAM Network which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Hoxne Parish Council's Neighbourhood Development Plan 2022-2037 area of interest. The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with</p>	<p>The map sent with this submission indicates a safeguarding line passing over the village. It is not clear what amendment to the Plan is being requested but in principle it is agreed that wording could be included in the plan to address the safeguarding requirement. Consultee contacted to establish the changes if any they want to the plan but no reply.</p>	<p>No amendment</p>

<p>them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern.</p> <p>Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.</p> <p>For your convenience, a copy of the safeguarding plan passed to DLUHC for formal issue has been attached to this email. (for MOD)</p>		
<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p>	Noted	N/A
<p>Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means the County Council makes planning policy and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan, adopted in July 2020. The County Council has assessed the neighbourhood plan regarding the safeguarding of potential minerals resources and operating minerals and waste facilities and has no concerns with the proposals in the plan.</p>	Noted	N/A
<p>Historic England have not yet been consulted on a Strategic Environmental Assessment for Hoxne Neighbourhood Plan, which we advised at Screening stage would need to be prepared owing to potential heritage impacts, and would also need to be supported by a heritage impact assessment.</p>	Noted – the SEA is underway. HE has been further consulted on amendments to Policy 15 and a revised policy agreed.	Hoxne NDP – revised policy 14 Abbey Farm Business Site The retention of the existing employment site at Abbey Farm (0.95hectares) identified in Figure N and on the Policies Map will be supported. Uses should be restricted to

		<p>those that can be carried out in a residential area without detriment to its amenity such as identified in Use Class E (c) and Use Class E(g).</p> <p>The site adjoins Scheduled Ancient Monuments to the east, south and north west. Any development proposals should safeguard these designations and be supported by a Heritage Impact Assessment. The site is also likely to have significant archaeological interest and planning applications should be supported by an archaeological assessment, including the results of fieldwork where appropriate. Proposals should be discussed with Historic England and with Suffolk County Council Archaeology Services at an early stage.</p>
<i>Policy Numbering</i>		
<p>Policy numbering: We had asked that the this be simplified (HOX 1, HOX 2, etc.). In addition to bringing the numbering system broadly into line with other neighbourhood plans, there is a practical reasoning behind our request, linked to character limits on our internal planning systems. Your compliance with the request would be appreciated. (MSDC)</p>	Agreed.	Amend policy numbering as requested
<p>The plan could benefit from the inclusion of a short glossary of key terms such as ‘affordable homes’, ‘brownfield sites’, and ‘heritage assets’ etc. (MSDC)</p>	Agreed	Add glossary to the Plan
<i>Foreword</i>		
<p>The sentiment in the first sentence is understood but feels clunky. Try: “The planning system has become target led over the last few years, w with the lack of available land for housing leading to a perception of unpredictable and</p>	Suggestion noted	<p>The planning system has become target led over the last few years with the lack of available land for housing making the process unpredictable and uncontrolled</p>

uncontrolled development in areas that would not normally be considered suitable despite local concerns and objections.” (MSDC)

allowing development in areas that would not normally be considered suitable for development despite local concerns and objections. The neighbourhood development plan is one way for local residents to gain back some control over the planning process by setting local perimeters and areas appropriate for development through public consultation and consent.

A neighbourhood development plan (NDP) is a powerful tool backed and informed by local debate and support. It aims to shape the future development and growth of a village making a direct contribution to the planning decision making process.

Hoxne has a long and eventful history that has shaped the village’s character and created a unique environment that is important to preserve and enhance. The shaping of the NDP has been driven by a passion to preserve these qualities and the village’s historic fabric, and will give a voice to local residents to enable them to have a say in the shape of future developments.

Recent local debate has defined housing needs, highlighted important assets and characteristics and looked at a number of potential development sites.

A design brief has also been established that uses local distinctiveness which aims to

		<p>inform and shape the detailed design development of projects before they get to the formal planning process so that their impact on the village is respectful of those elements that make Hoxne the wonderful place it is.</p> <p>As residents I hope that you will be able to continue your support for this process and are able to give it its formal approval when it comes forward at the referendum.</p> <p>Finally I would also like to thank those residents, parish councillors and consultants who have given their time and come forward to help in drafting this document especially the parish clerk, and our expert consultant Andy Robinson who have expertly guided and controlled the process to shape this document.</p>
In the second para., should the acronym 'NDP' appear in brackets? (MSDC)	Agreed NDP should be in brackets	Amend to put NDP in brackets
In the fourth para., we suggest deleting the comma after 'defined' (MSDC)	Agreed comma should be deleted	Delete comma
<i>Contents</i>		
Section 5 of the contents page needs updating. The listed policies do not correlate with what is in the plan itself. No page number is given for the Policies Maps and you may also want to consider including page numbers for each of the policies. (MSDC)	Agreed – contents page will need updating. The Policies Map and Policies should be given page numbers	Amend contents page for submission draft

The Contents Page misses out Policy 10 Housing Allocations, which then mis-numbers the following policies. The plan also has two policies labelled as Policy 16 (Abbey Farm Business Site, and Infrastructure Requirements), however Abbey Farm business site should be labelled as Policy 15 on page 30. Community Policy B is titled as "Quiet Lands" on the Contents Page and should be "Quiet Lanes" (SCC)	Agreed – as above	As above
<i>Chapter 1</i>		
<i>Para 1.5</i>		
The first sentence should read: "The Hoxne Neighbourhood Development Plan will come into force as part of the statutory development plan for the designated area if it is approved at a Referendum." (MSDC)	Agreed	Amend para 1.5 as suggested
<i>Para 1.13</i>		
Replace the word 'Government' with 'Locality's' (MSDC)	Not agreed – technical support is Government funded. Specific technical projects are subject to Government approval	No amendment
<i>Chapter 2</i>		
<i>Para 2.14 and heading before 2.17</i>		
In both cases, delete the first use of the word 'Joint' so these both just read 'Babergh and Mid Suffolk Joint Local Plan' (MSDC)	Agreed	Amend as suggested
<i>Para 2.9</i>		
For paragraph 2.9, in addition to the three Scheduled Monuments in the parish – there are also non-designated archaeological remains recorded in the Suffolk Historic Environment Record maintained by Suffolk County Council, and the publicly accessible online version can be searched through via a map search, which may produce other information that could be included in the summary https://heritage.suffolk.gov.uk/ . (SCC)	Agreed that additional information about archaeology should be added but better in the Supporting Document.	Add the following to the Supporting Document: Banham Brickyard (Eye Road) Extensive archaeological excavations, directed by John Wymer on behalf of the University of Chicago, were carried out during 1971-1974 and 1978. Between 1992-1993 archaeological excavations were carried out on the site of

		<p>the medieval Chapel dedicated to St Edmund.</p> <p>Between 6-8 July 2014 the Hoxne Heritage Group organised a village wide test pit event which produced artifacts from the medieval to the modern periods.</p>
<i>Chapter 3</i>		
<p>Objectives The Natural Environment falls under Objective b. which aims to maintain and improve the parish green spaces and surrounding landscape. SCC is supportive of this objective. (SCC).</p>	Support welcome	N/A
<p>On page 10 we would like to see the following wording added to Objective b: "Maintain and improve its green spaces and surrounding landscape, including the public rights of way network." (SCC)</p>	<p>The objectives for the plan were set at the beginning of the Plan making process and provide a benchmark against which the effectiveness of plan policies can be assessed. It would not be appropriate to make changes at this stage.</p>	No amendment
<p>It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.</p> <p>We therefore welcome the production of this neighbourhood plan, and are pleased to see that the historic environment of your parish features throughout. In particular we would like to make the following comments.</p> <p>We are pleased to note that Objective a) under paragraph 3.1 aims to "retain and protect the heritage and historic character of the village". It is also helpful that Table 1 then clearly identifies which policies will seek to uphold the objectives. (Historic England)</p>	Support welcome	N/A

<i>Chapter 4</i>		
<p>To support a natural and sustainable environment we welcome Policy Hoxne 5 green spaces; Policy Hoxne 6 Managing change in the landscape and Policy Hoxne 9 Sustainable Construction. There are no references to health and wellbeing linked with these policies, and as such could be referenced in paragraph 4.15 to support Policy 5. Access to open space has a positive impact on health and wellbeing, and living close to areas of green space, parks, woodland, and other open space can improve physical and mental health⁴ regardless of social background. Open and green spaces are associated with increased physical activity, increased environmental cooling, and improved general physical health outcomes and reduce higher average summer temperatures resulting in discomfort and excess summer deaths amongst vulnerable people. (SCC)</p>	<p>Agreed that the importance of green spaces etc to general health and well being should be referenced in the plan and provides additional justification for the policies.</p>	<p>Add 'Green spaces are important to the quality of the built environment and because of their benefits to health and well-being' to LGS supporting text.</p>
<p>Public Rights of Way Neighbourhood Plan Generally, SCC is pleased to see mention of walking and cycling links within the plan itself, along with Supporting Document 10 – Traffic and Transport, however there is currently no specific mention that the designated area includes a significant public rights of way (PROW) network. PROW are legally protected highways, and the NPPF states at paragraph 100 that planning policies and decisions should protect and enhance PROW and access, including taking opportunities to provide better facilities for users, for example, by adding links to existing PROW networks (which in this case could notably include the Stour and Orwell Walk). We would like to see specific mention of the local PROW network, its importance, and how it enables effective links with neighbouring parishes and beyond. This would ideally be included as an individual policy, perhaps in section 6. All new development should be successfully integrated physically,</p>	<p>Agreed that PROW should be protected</p>	<p>Add a new policy in Chapter 6 Transport as follows “Development which would adversely affect the character or result in the loss of existing or proposed Public Rights of Way will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to Public Rights of Way for pedestrian, cyclist, or horse rider use. Improvements and additions to Public Rights of Way will be supported as an integral part of new development and too enable new or improved links to be created within the settlement, between settlements and/or</p>

<p>environmentally, and socially with the existing settlement and community. The following wording is recommended: “Development which would adversely affect the character or result in the loss of existing or proposed PROW will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to PROW for pedestrian, cyclist, or horse rider use. Improvements and additions to such PROW shall be delivered as an integral part of new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate.” (SCC)</p>		<p>providing access to the countryside or green infrastructure sites.’</p> <p>Add a map of PROW and text to support this policy.</p>
<p><i>Para 4.4</i></p>		
<p>Paragraph 4.4 on page 11 could be amended to include PROW as above (SCC)</p>	<p>See response above objectives should not be altered at this stage.</p>	<p>No amendment</p>
<p><i>Para 4.5</i></p>		
<p>In paragraph 4.5, where it says that Hoxne is ‘the place of execution of Anglo-Saxon King Edmund’, it could instead say that it is “one of the possible places suggested for the place of execution...” as there is some ambiguity over the precise location of his death.</p> <p>The final sentence of paragraph 4.5 does need to be clarified as ‘any development’ may not be appropriate on the one hand, and on the other there may be a need for investigation prior to planning consent, in accordance with the NPPF.</p> <p>As an amendment, the following is suggested, which would bring it closer to Policy 2 “Its exceptional archaeological importance necessitates means that archaeology should be considered at an early stage in planning proposals, so that sufficient information is available to inform planning</p>	<p>Agreed that the statement about King Edmund should be qualified.</p> <p>Agreed that final sentence of para 4.5 should be amended for clarity</p>	<p>Change the sentence ‘the place of execution of Anglo-Saxon King Edmund’, to “one of the possible places suggested for the place of execution...”</p> <p>Replace final sentence of para 4.5 as follows: “Its exceptional archaeological importance necessitates means that archaeology should be considered at an early stage in planning proposals, so that sufficient information is available to inform planning decisions, and so that appropriate investigation can be secured prior to development.”</p>

decisions, and so that appropriate investigation can be secured prior to development.” (SCC)		
The medieval scheduled sites could be worth mentioning in paragraph 4.5 (they are discussed on Supporting Document 6): Hoxne Priory, the moated site next to the church which may have been originally the site of the Bishop of Norwich’s Palace, and medieval fishponds at The Leys. There are also two medieval deer parks of the Bishops of Norwich at Oakley Park, and Old Park. (SCC)	Agreed	Amend para 4.5 by adding reference to medieval scheduled sites giving a couple of examples.
<i>Policy 1</i>		
The Joint Local Plan will now be split into two parts, with ‘up-to-date and robustly justified settlement boundaries reflecting commitments and allocations’ not now coming forward until Part 2. (See the letter from the JLP Inspectors dated 9 Dec. 2021 and listed by us as Core Document G06). At present, we cannot put a timescale on the Part 2 Local Plan, or when these new boundaries will be available for comment. The guidance for now is that settlement boundaries should revert back to the those in the last adopted Plan which, in this case, is the 1998 Mid Suffolk Local Plan. Through the Hoxne NP, there is now the opportunity to establish a new settlement boundary which is more reflective of the current position. It should be guided by the ‘draft’ boundary in the JLP, any extant planning permissions and any proposed allocations. As appropriate, it should be justified in the supporting text. A further conversation about this beyond this response may be needed. [See also the two maps reproduced at the end of this response where we highlight in blue differences between draft JLP and Hoxne NP boundaries.] (MSDC)	There is no reason why the HNDP should follow the settlement boundaries in the JLP especially as it has no status in this regard. Its not clear what further justification is required in the supporting text.	The settlement boundary has been checked against the withdrawn Joint Local Plan and some amendments made.
<i>Policy 2</i>		
We welcome Section 4, particularly the highlighting of the heritage assets in the parish in the supporting text and	Agreed that typo needs correcting	Change ‘and’ to ‘an’ in Chapter 4 heading.

<p>accompanying Figure 4. A suggestion for strengthening policy 2 still further might be to make explicit a requirement for a heritage statement to be submitted where any heritage asset is likely to be affected, and also incorporate a requirement for the results of any archaeological investigation to be disseminated locally to maximise the public benefit accrued from the investigation. Finally, we note that the heading for Section 4 may contain a typographical error. (Historic England)</p>	<p>Agreed that there should be a requirement for a heritage statement where any heritage asset could be affected.</p>	<p>Add after para 2 in Policy 2 'Where a proposed development is likely to affect any heritage asset a heritage statement will be required.'</p>
<p><i>Policy 2 and Figures 3 and 4</i></p>		
<p>Policy 2 is welcome, and the reference to SCCAS is acknowledged and welcomed. Figures 3 and 4 could instead be captioned as "Designated Heritage Assets". There is an entry in the legend for non-designated assets, but none appear to be displayed on the images. Or it is suggested that the maps include the list in Appendix 3 of Supporting Document 6, 'Non-Designated Heritage Assets', in which case the legend could say "Non-Designated Heritage Assets (buildings and structures)". The Heritage Explorer¹ has information on archaeological sites and finds in the parish. (Historic England)</p>	<p>The treatment of non designated assets needs to be consistent. As they have not been identified in Fig 3 and 4 they should not be included at this stage as people have not had the opportunity to comment. Therefore Policy 2 should be amended to say where non designated assets are identified and the Figures should have reference to non designated assets removed.</p>	<p>Amend Figures 3 and 4 by removing reference to non designated assets in the legend. Amend the first para of Policy 2 to read: 'All development should protect and enhance the appearance, character and setting of the heritage assets and protected trees shown on Figures 3 and 4 and on the Policies Map, and the non designated assets identified in Appendix 3 of Supporting Document 6 or its successor documents.'</p>
<p><i>Policy 2 and Figures 2 and 3 (3 and 4?)</i></p>		
<p>The requirement that 'All' development should protect and enhance the appearance, character etc. seems excessive. A reasonable compromise would be to say: 'Where necessary or appropriate, development proposals should ...' (MSDC)</p>	<p>Suggested revised wording leaves too much room for interpretation. Instead delete 'All'</p>	<p>Delete all</p>
<p>HOX 2 refers to Non-designated Heritage Assets (NdHAs). We commented informally in this before and refer you back to what was said. Essentially, if you are seeking to protect NdHAs, these should be clearly identified [there are no NdHAs visible on either Figure 2 or Figure 3, even though the key suggests otherwise] and justification put forward for their inclusion. Just having a list of buildings or architecture</p>	<p>See proposed amendment above. Additional justification for the list of non designated assets to be added to Appendix 3 of SD 6.</p>	<p>Add additional justification to Appendix 3 of SD6 and identify the locations on the relevant maps.</p>

<p>(your SD6 - Appendix 3) is not considered sufficient. See again the NdHAs published by Historic England: https://historicengland.org.uk/images-books/publications/localheritage-listing-advice-note-7/ (MSDC)</p>		
<p>The inclusion of a reference to protected trees [those covered by Tree Preservation Order] within the text seems at odds with the policy title and the other content. You could change the policy title to include a reference to trees or it may be better to mention these elsewhere - maybe in connection with policy HOX 3: Design [see comment below] or maybe HOX 7: Biodiversity Networks. (MSDC)</p>	<p>There is a reference to protected trees in Reg 14 Policy 2 which is retained in the Policy as proposed to be amended (see above). Reference should be added to para 4.10 and an Appendix added to SD6 listing the TPOs in the Parish. They also need to be shown for the whole parish on the Policies Map. OK Graham and Rob?</p>	<p>Refer to protect trees in para 4.10 clarifying that they are all subject to TPOs.</p> <p>Ensure all such trees are identified on the Policies Map including those on the whole parish map.</p> <p>Add an Appendix to SD6 listing the TPOs.</p>
<p><i>Policy 3</i></p>		
<p>Linked to our comment above on protected trees, and with reference to previously suggested wording, consider amending the second para. to read: “The rural setting of Hoxne should be reflected in appropriate levels of landscaping and boundary screening/planting, including through the retention of both protected trees and other trees, tree belts and hedgerows, and make a feature of them as part of the development.” This would reflect, for example, NPPF para 131, and also the perceived important that is attached to trees locally (MSDC)</p>	<p>This would strengthen the policy</p>	<p>Amend para 2 of Policy 3 to read: “The rural setting of Hoxne should be reflected in appropriate levels of landscaping and boundary screening/planting, including through the retention of both protected trees and other trees, tree belts and hedgerows, and make a feature of them as part of the development.”</p>
<p>On page 16, we would suggest adding reference to PROW in Policy Hoxne 3, as follows: “All development should accommodate existing PROW and consider opportunities to improve and increase the local network.” The Plan should include a map showing all of the PROW in and around the designated area. The definitive map (divided into parishes) can be found at https://www.suffolk.gov.uk/roads-andtransport/public-rights-of-way-in-suffolk/view-definitive-maps-of-public-</p>	<p>See above also – better to include a new policy as suggested above</p>	<p>Add a new policy in Section 6 Transport – see above.</p>

rights-of-way/ and further information can be obtained by contacting definitivemaps@suffolk.gov.uk (SCC)		
Policy 3 Design does include reference to Suffolk Guidance for Parking 2019, which is welcomed, however a parking-specific policy or greater detail in this policy may be beneficial. It is recommended that there is provision for a proportion of on-street parking considered for new developments. On-street parking will always be inevitable from visitors and deliveries or maintenance. Having well designed and integrated on-street parking can help to reduce inconsiderate parking, which can restrict access for emergency services and refuse collections, and parking on pavements that hinder pedestrian access and safety. As such, the following wording is proposed to Policy 3: "All parking should adhere to standards set out in Suffolk Guidance for Parking (2019), or any other successor documents, and should include a proportion of well-designed on-street parking provision within all new developments." (SCC)	Suggested amendment supported	Amend the 4 th para of Policy 3 to read: "All parking provision should adhere to standards set out in Suffolk Guidance for Parking (2019), or any other successor documents, and should include a proportion of well-designed on-street parking provision within all new developments."
We welcome the strong commitment the plan makes to good design, and the use of a local Design Code. (Historic England)	Comment welcome	N/A
<i>Policy 4</i>		
This would be better if it read: " ... impacts on the key views ..." (MSDC)	Better to read 'Protecting Key Views'	Amend the title of Policy 4 and Figure 5 to read 'Protecting Key Views'
The protection of 26 identified important views is anchored in Policy 4, in Figure 5 and on the Policies. Map. The plan refers to Supporting Document 6 - Settlement Structure, Heritage and Landscape Setting which provides brief descriptions and justifications for the 26 identified important views. Some views appear more important than others; however, this is not clear on the map showing the locations of the views. There are no photographs of the	Agreed Photos will be added to SD6.	Add photos to SD6 of each key view.

views. The policy would be more effective if photographs showing the views from their mapped location, as this would provide clarity as to exactly what the view is. It is therefore recommended that the plan should provide clear justification and images for each of the views, and clarify where each of the viewpoints are located, and to ensure that they are all publicly accessible. (SCC)		
Important views cannot be from residences, or private gardens or land. For example, SCC queries if Viewpoint 26 (View from White House Farm across agricultural land towards Chickering) is publicly accessible to gain entry to the viewpoint, and that White House Farm is not private land. (SCC)	Check all views are available to the public particularly VP26.	Checked
<i>Figure 5</i>		
The protection of key views is welcomed, but we would recommend that the map is updated to show more clearly where all the views are. The small red arrows are not sufficiently clear currently when viewing the whole page. View 11, for example, is barely visible. (Historic England).	Agreed	Amend maps to improve legibility
<i>Policy 5</i>		
It is suggested the neighbourhood plan instead safeguards the 0.12ha of land bordered in yellow on the map below for educational purposes. It should be noted that this safeguarding may not be compatible with the Local Green Space designation on this land in Policy Hoxne 5 and may restrict ability of the school to fully utilise the land. As such the Neighbourhood Plan Group should consider removing this designation. (SCC)	Agreed safeguarding and green space not compatible and it is essential that the school can be expanded if required.	Remove LGS designation from site adjoining school in Supporting Document 4, POLICY 5 and all maps.
SCC welcomes the eight designated Local Green Spaces in Policy 5, shown in Figure and on the Policies Map, as this supports the ongoing work to make Suffolk the Greenest County5 . The supporting text sets out the NPPF criteria for the designation of Local Green Spaces, which is supported	Typo need correcting	Amend enduing to enduring in para 4.14

by SCC, however there is a typo in paragraph 4.14 which should be “enduring”. Whilst SCC is supportive of designating local green spaces, please note our earlier comments regarding LGS4 The Green Adjoining the Primary School. (SCC)		
<i>Policy 6</i>		
For consistency with both policy content and Fig 7, rename this: ‘HOX 6: Area of Local Landscape Sensitivity’ [Nb: remember to amend the Contents page too].	The policy deals with enhancing the landscape generally as well.	No amendment
<i>Policy 7</i>		
Policy 7 - Biodiversity Networks This policy is based on Supporting Document 8 Landscape and Wildlife Evaluation, 2021. Given the detailed evidence base, Policy 7 appears somewhat generic. This policy could include the following statement: “Plans for mitigation and enhancement should directly reference supporting document 8 Landscape and Wildlife Evaluation, unless there is more up-to-date evidence.” (SCC).	Agreed	Amend policy by adding a new paragraph as follows: “Plans for mitigation and enhancement should directly reference supporting document 8 Landscape and Wildlife Evaluation, unless there is more up-to-date evidence.”
<i>Policy 8</i>		
<ul style="list-style-type: none"> • Check your wording in the second paragraph. Did you mean: “Development will not normally be supported in the “ • Edit the first sentence of the third paragraph to read: “Proposals should include the use of above-ground open Sustainable Drainage Systems (SuDS) where appropriate to the scale and nature of the development (MSDC) 	Agreed – should say should not be supported	Amend policy 8 by amending the second para to read ‘Development will not be supported in the....’
For Policy 8 Flood Risk, the wording in the second paragraph is in conflict to overall national and local policy and practice associated with development in flood risk areas. It is assumed to be a typo, and the following is proposed: “Development will not be supported in the areas of highest flood risk identified in Figure 8 and on the Policies Map.” We support the reference to inclusion of SuDS in proposals. (SCC)	As above	As above

<i>Figure 8</i>		
<p>Figure 8 appears to show only fluvial flood risk areas. For completeness and context, the areas at risk of pluvial flooding should also be shown. These can be found at https://check-long-term-floodrisk.service.gov.uk/map?easting=612367.77&northing=244997.19&map=SurfaceWater (SCC)</p>	Agreed.	Amend Figure 8 to show pluvial flood risk
<i>Policy 9</i>		
<p>This is a re-working of a draft policy you shared with us in 2021 and we now see similarities between this and other 'Sustainable Construction Practice' policies in, for example, the referendum versions of the Thorndon and Laxfield NPs. HOX 9 differs in that it also includes at criterion e., a requirement for EV charging points for all home[s] and in the lack of an opening statement that says, 'This policy only applies to non-residential development.' When we commented on the earlier draft we were careful to also draw your attention to the Written Ministerial Statement dated 25 March 2015. This makes it clear that is not appropriate for neighbourhood plans to impose additional local technical standards or requirements relating to the construction etc. of new dwellings and that remains the case for now. Left as it is, your NP Examiner is likely to refer to the WMS and require that the policy be modified by including the same opening statement about this only applying to non-residential development. Perhaps also consider rewording / moving the EV charging criteria to either the design policy (HOX 3) or to sit in both of the allocation policies. (MSDC)</p>	Policy amended	<p>Revised policy</p> <p>Sustainable Construction</p> <p>Proposals that incorporate current best practice in energy conservation will be supported where such measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings. Development proposals should demonstrate:</p> <p>a. how they maximise the benefits of solar gain in site layouts and orientation of buildings;</p> <p>b. incorporate best practice in energy conservation and be designed to achieve maximum</p>

		<p>achievable energy efficiency through a 'fabric first' approach;</p> <p>c. maximise the benefits of natural ventilation or utilising heat recovery mechanical ventilation in well sealed properties;</p> <p>d. avoid fossil fuel-based heating systems;</p> <p>e. encourage the inclusion of EV charging for all new homes with a the minimum provision of ducting necessary for future installation; and,</p> <p>f. incorporate sustainable design and construction measures and energy efficiency measures to new dwellings including, where feasible, ground/air source heat pumps, solar thermal, solar photovoltaic, rainwater and stormwater harvesting;</p>
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		g. Developments over 5 units should include the provision for a Sustainable Drainage System (SuDS) within the overall development plan.
In Policy 9, paragraph f, reference is made to rainwater and stormwater harvesting, which is welcomed by SCC as the Lead Local Flood Authority. The Policy would benefit from inclusion of references to the provision of SuDS within proposals to manage water in a holistic and sustainable way. (SCC)	Policy amended	See Above
Policy 9 Sustainable Construction refers to EV charging, which is supported by SCC, and specifications should be as detailed in SGP 2019. (SCC)	Policy amended	See Above
<i>Chapter 5</i>		
We welcome the evidence provided in the Neighbourhood Plan and acknowledge that Hoxne has a high proportion of older people. The Suffolk Observatory which suggests Hoxne Parish has an overall population of approximately 875 people, with the predominant age ranges of 55-74 years. This means that houses will need to be adaptable to meet their health needs. The prevalence of dementia in Hoxne Parish (3.94%) similar to England (3.97%) but is also likely to increase with ageing. We welcome the plan includes the desire for smaller homes that are adaptable and accessible, which meets the requirements for both older residents as well as younger people and families, in Policy 12. Building homes that are accessible and adaptable means that these homes can be changed with the needs of their occupants, for example if their mobility worsens with age, as these homes are built to a standard that can meet the needs of a	Comments welcome	N/A

<p>lifetime. While it is understandable that each housing type may not be suitably accommodated on every site, efforts should be made where possible to ensure that each site contains a mixture of housing types. This can help prevent segregation by age group and possible resulting isolation. We welcome the detail of adaptability on page 60 of the Design Code document. Consider shelter, landscaping, street lighting, making spaces attractive, inviting and feel safe. Seating such as “Happy to Chat Benches” are also encouraged to support people with social isolation and their wellbeing. Recognise the increasing need to create elderly, frailty, and dementia-friendly neighbourhoods that consider aspects such as: wheelchair/reduced mobility accessibility and distinctive signage. Considerations for the needs of residents who are living with dementia in the community, and the potential for making Hoxne “Dementia-Friendly”. The Royal Town Planning Institute³ has guidance on Town Planning and Dementia which may be helpful in informing policies. There is a high number of people currently living in private rented accommodation: 72 properties are socially rented compared to 91 houses with a mortgage or loan. This suggests that there is a need for affordable housing for families and workers to give people the opportunity to purchase their own homes. Policy 11 sets out a reasonable expectation for affordable homes in the parish and is supported by SCC (SCC)</p>		
<p><i>Policy 10</i></p>		
<p>The inclusion of this new policy, which provides the strategic overview of how many new homes this Plan provides for is welcomed (MSDC)</p>	<p>Comment welcomed</p>	<p>N/A</p>
<p>The Trust notes the proposal in the draft plan to allocate two areas for residential development near the school.</p>	<p>Comments welcome</p>	<p>N/A</p>

<p>These are identified as H13 (Shreeves Farm) and H14 (land between Denham Low Road and Hoxne Playing Field).</p> <p>A considerable number of the homes proposed for H13 can be expected to be inhabited by children of school age; the proportion is rather less for H14. Overall, this would contribute to demand for school places and the long-term viability of the school.</p> <p><i>The Trust has no objection in principle to the allocation of H13 and H14 in the draft plan.</i></p> <p><i>(Primary School)</i></p>		
<p><i>Policy 11</i></p>		
<p>Hoxne 11 – Affordable Housing Provision We have significant concerns that fixing the number of affordable housing units across the whole plan (Residential development sites allocated in this Plan should provide for about 18 affordable homes) is likely to prejudice the ability for the sites to be delivered independently. There are two principle areas of concern:</p> <p>1) Whilst the allocations on each site are a reasonable assessment of the likely housing numbers, thorough investigations have not been carried out to assess the physical constraints of the land. If, for example, Shreeves Farm can accommodate 3 or 4 fewer units than anticipated should the site continue to deliver the same number of AH units? Or will the additional AH need be pushed onto the next site? In either scenario the viability of one or the other scheme may be prejudiced by factors which are out of the control of the landowners, resulting in a development proposal which is either contrary to the provisions of the</p>	<p>The Plan properly sets out the requirements for the development of the site. When planning applications are considered other material considerations including viability will be taken into account. The requirement for homes suitable for older people have been reduced from 10 to 7 for the Shreeves Farm site</p>	<p>No amendment</p>

<p>Neighbourhood Plan or, alternatively, unviable and undeliverable. 2) These sites are in different ownerships and will not be delivered under one permission. If a proposal on either site is permitted for development under the minimum threshold for affordable housing in Mid Suffolk e.g. a proposal for 9 units) then, under the terms of policy Hoxne 11, it would fall to the other site to deliver all the affordable housing required by that policy. There is high risk that the other expectations on the neighbourhood plan are undeliverable if affordable housing is forcibly pushed above the district policy level. Furthermore, if either site is to face this requirement then a 'stalemate' scenario could occur, with neither site able to bring forward a viable scheme without commitment from the other to bring forward its 'fair share' of affordable housing. I can foresee this making any delivery very difficult. To address these concerns, we respectfully suggest that it would be more appropriate to seek affordable housing delivery on a percentage basis applied to each site, in line with the policy of the Emerging Local Plan (35%).</p>		
<p><i>Policy 12</i></p>		
<p>We welcome the changes made to this Housing Types & Sizes policy. The preferred mix is clear and there is now also recognition that this may change should circumstances dictate otherwise. (MSDC)</p>	<p>Comment welcome</p>	<p>N/A</p>
<p><i>Policies 13 and 14</i></p>		
<p>For Policy H13 and H14, we would advise a programme of archaeological work prior to development. (SCC)</p>	<p>Agreed</p>	<p>Add new para to Policy 13 and Policy 14 to state 'A programme of archaeological investigation is likely to be required prior to the development commencing'</p>
<p>Regarding Policies 13 and 14, crossing and footway improvements at the primary school are also required as part of the above highway improvement scheme. (SCC)</p>	<p>SCC were consulted for clarification: 1. School footway and crossing facilities are</p>	<p>Policies 13 and 14 to be amended as requested by SCC.</p>

necessary for both Policies 13 and 14 so it is felt that both should include wording such as:

This development should provide improved footway and crossing facilities at the primary school, either independently or in conjunction with Policy 13/14.

2. Similarly, both sites rely on Denham Low Road for footway links to the wider village, so both Policies 13 and 14 should include wording such as:

This development should provide a footway link and associated necessary highway improvements on Denham Low Road, either independently or in conjunction with Policy 13/14.

Neither development will be acceptable to the Highway Authority without these improvements.

<p><i>Policy 13</i></p>		
<p>Policy Hoxne 13 states that “provision of 0.4 hectares of safeguarding land should be made for an extension to the school to allow for future building extension, playing area and parking if required”.</p> <p>Even though the number of pupils on the school roll is not currently at its recorded maximum, the layout of the site means that the school faces certain constraints. Classrooms are short of room and the amount of outdoor space is insufficient for all the school’s needs.</p> <p><i>The Trust considers that the Neighbourhood Development Plan should secure sufficient extra land to meet the school’s future needs.</i></p>	<p>Agreed – ensure that land is safeguarded</p>	<p>Ensure the site area for Policy 13 is shown in the new Figure and on the Policies Map incorporates the land to be safeguarded for school use.</p>
<p>The school currently benefits from an arrangement with a neighbouring landowner under which the school has use of an area of green space to its immediate south. This space is identified as LGS4 in Figure 6 of the draft plan, although the space has no element of public access. While the school is very grateful to this landowner for this arrangement, it would be preferable for the school to have permanent and unrestricted access to a larger outdoor space.</p> <p><i>The Trust considers that the boundary of H13 should be extended to include the space identified as LGS4 to safeguard this area for unrestricted future school use.</i></p>	<p>Agreed</p>	<p>As above</p>

<p>Shreeves Farm (Design Code) Policy Hoxne 13 makes reference to the Design Code and Masterplan. It seems trivial but this wording is misleading and this plan should be named the 'Concept Plan', with clear reference to the fact that the plan sets out one possible way in which development could come forward at the site, rather than the prescribed way in which it must come forward. The parish emerging Neighbourhood Plan should recognise that a deliverable masterplan for the site will need to be informed by technical information and will need to respond to site specific constraints. There may be technical constraints on the site which make divergence from this concept layout unavoidable, quite apart from the fact that there may well be alternative – and equally acceptable – design approaches to developing the site. In order to avoid confusion, it is our view that the wording accompanying the Concept Plan/Design Code should be amended reflect the above.</p>	<p>Indicative master plan is appropriate – the word indicative is the opposite of prescriptive. Add some words in the supporting text to emphasise this.</p>	<p>No amendment to Policy. Amend text to emphasise that the masterplan is indicative.</p>
<p>For Policy 13, the Shreeves Farm site will rely on Policy 14 Denham Low Road highway improvements for pedestrian access, as it appears to be the only suitable route to the primary school/ village centre from that site. This will have to be linked to whichever site comes first unless there is a reliance on land from one of the sites, which may complicate matters. (SCC)</p>	<p>SCC were consulted for clarification: 1. School footway and crossing facilities are necessary for both Polices 13 and 14 so it is felt that both should include wording such as:</p> <p><i>This development should provide improved footway and crossing facilities at the primary school, either independently or in conjunction with Policy 13/14.</i></p>	<p>Policies 13 and 14 to be amended as requested by SCC.</p>

	<p>2. Similarly, both sites rely on Denham Low Road for footway links to the wider village, so both Policies 13 and 14 should include wording such as:</p> <p><i>This development should provide a footway link and associated necessary highway improvements on Denham Low Road, either independently or in conjunction with Policy 13/14.</i></p> <p>Neither development will be acceptable to the Highway Authority without these improvements.</p>	
<p><i>Policy 12/13</i></p>		
<p>This proposed policy seeks to dictate the size and types of the market dwellings. It is our view that the prescriptive nature of this policy is overly restrictive and would render other aims and policies of the Neighbourhood Plan undeliverable. To meet the specific policies of the Emerging Local Plan and the Hoxne Neighbourhood Plan, and the wider aspirations of the Neighbourhood Plan, the Shreeves Farm site is being asked to deliver a significant amount of associated benefits. These include 35% affordable housing (with a defined housing mix and tenure split) and 0.4ha of land for school expansion, new green space, as well as the</p>	<p>The Plan properly sets out the requirements for the development of the site. When planning applications are considered other material considerations including viability will be taken into account.</p>	<p>No amendment</p>

generally applicable requirement for a high standard of design, tenure blind affordable housing, CIL education contributions etc. Whilst it is quite correct that new development sites must deliver these wider benefits wherever possible, this can only be done if the site is deliverable, and the requirements asked of the developer viable. To give the best chance on delivering on these expectations, the market housing must be free to be to be market facing, maximising the ability for the development to deliver on the other expectations of the plan. There is no benefit to be secured from an unviable development. Unviable development cannot deliver return for the local authority, the parish, the landowner or the developer and therefore is likely to prevent any development from coming forward. In addition to this concern regarding significant impact on viability of the site, a further risk is that the assessment for housing needs changes over time. The policy seeks to secure the housing identified as being required by the most recent Housing Need Survey. However, this survey represents the situation at a particular point in time. To tie delivery to the need at that specific time risks being quickly outdated and not bringing any social benefit to the village – this is reflected in draft Policy Hone 12 (which allows the particular circumstances of the site, or the latest publicly available evidence of housing need information to supersede the target mix with the policy, based on current housing need), but not in the site specific Policy 13. For the Neighbourhood plan to deliver on its ambitions for the village this policy cannot be included. It must be stressed that this does not mean that the site will solely deliver large executive housing: it is likely in the current market that the site will be a mix of family housing and in line with the

<p>policies of the Emerging Local Plan. However, the market must have the freedom to determine this.</p>		
<p><i>Policy 14</i></p>		
<p>We support the allocation and consider that the development of the site can provide a range of benefits. These include: • Market and affordable housing; • Housing to meet a range of local needs such as housing for older people; • The existing vehicular access to the playing field is one car wide and the development can provide a wider access to the playing field for cars and pedestrians; • Improved footway links in Denham Low Road; • Pavements around the school and junction improvements between Denham Low Road and Cross Street; • Improvements to the playing field facilities; and • The development of the site will allow better pedestrian and cycle access between the Shreeves Farm NP allocation and the playing field.</p> <p>The development of the site is unconstrained as shown on the Constraints and Issues Plan on page 79 of the Hoxne Neighbourhood Plan Design Code. The site is well related to the built-up area of the village, the playing fields and the other NP housing allocation. The majority of the hedges around the site can be retained except where removal is required for access. Within the site boundaries, the site is grass having been grazed by horses for many years. The site is not productive agricultural land and has not been used for agriculture for a long time. To ensure that the site can be developed successfully, we have worked with a local firm of highways consultants known as BHA Consulting. Their advice has shown how Denham Low Road can be improved with a pedestrian footway. At present, the primary school entrance on Denham Low Road does not have a pavement outside so people step directly into the road. The road is wide at this point a new pavement outside the school and a wider</p>	<p>Comments welcome</p>	<p>N/A</p>

<p>pavement opposite the school would provide significant pedestrian improvements and would slow car traffic by narrowing the junction. A highway design has been carried prepared by BHA Consulting and shows that these improvements can be provided. This information has been given to the NP Group. We consider that the site can provide a high quality housing development that provides housing to meet local needs as well as a range of local community and highway developments. We support the allocation and would be happy to address any questions from the NP group or from the NP Examiner.</p>		
<p>Policy Hoxne 14 states that “a footpath from the site to the Denham Low Road / Cross Street junction and a new footpath in front of the school should be provided with a reduced carriage way width at the junction to improve school safety.”</p> <p>The development of H14 would increase traffic at this junction and steps would need to be taken to ensure that there is no adverse effect on the safety of school pupils and staff. At present, there is no footway outside the school and pupils and staff step straight out of the school gates onto the carriageway.</p> <p><i>The Trust considers that any development of H14 should incorporate appropriate road safety measures, including a footway in front of the school.</i></p>	<p>Agreed – wording added to policies 13 and 14 to ensure footpath provision is made</p>	<p>Amend policies 13 and 14 by adding an additional para as follows:</p> <p>The development should provide a footway link and associated necessary highway improvements on Denham Low Road including improved footway and crossing facilities at the Primary School, either independently or in conjunction with the (other) site (Policy 13or 14).</p>
<p>For Policy 14 Denham Low Road allocation, footpath provision and reduced carriageway at school, a generally acceptable footway scheme can be provided, but will</p>	<p>Consultants for the landowner have confirmed that this is consistent with their proposals.</p>	<p>No change required.</p>

<p>require a priority traffic system to enable a suitable width footway (SCC)</p>		
<p><i>Policy 12, 13, 14 and para 5.4</i></p>		
<p>All three policies and the supporting text refer to a proportion of the new dwellings being built to M4(2) Standards. Linking back to our comments above about the Written Ministerial Statement, your NP Examiner is likely to modify the Plan by removing any direct reference to developers having to meet this standard. You may want to try ‘dwellings built to M4(2) standard will be supported’ rather than make this a specific requirement but this approach has not, to the best of our knowledge, been tested at examination yet. (MSDC)</p>	<p>Para 5.4 and policy 12 amended</p>	<p>5.4 Regarding older people the need to locate specialist units in locations with good access to services means that the Plan does not seek to make any specific provision for such units as nearby towns such as Diss and Eye are more suitable. However, it does seek to ensure some new provision, about 20 homes, are suitable for older people as adaptable and accessible homes built to current standards recommending the use of the M4(2) (wheelchair accessible category) and through the allocation of smaller units and bungalows.</p> <p>POLICY HOXNE 12 AMENDED</p> <p>House Types and Sizes</p> <p>All new residential development proposals will be expected to deliver the mix of house types and</p>

		<p>sizes set out below, unless it can be suitably demonstrated that the particular circumstances of the site, or</p> <p>the latest publicly available evidence of housing need information for the Plan area suggests otherwise:</p> <ul style="list-style-type: none"> - 42%1or2bedroomhomes - 38%3bedroomhomes - 20%4bedroomhomes <p>Some homes suitable for older people should be provided in the form of bungalows or adaptable and accessible homes would be supported where built to current Approved Document standard M4(2).</p>
Policy 15 (16 in the Plan)		
We note the inclusion of the site allocation H15 in the plan. The site allocation identifies the site for the continuation	HE have been contacted about its comments on this site and a revised policy	Hoxne NDP – revised policy 14 Abbey Farm Business Site:

<p>and intensification of employment uses. It covers an area within and adjacent to the Scheduled Remains of Hoxne Priory, at Abbey Farm. Please see the map of the scheduled area on the List Entry: https://historicengland.org.uk/listing/the-list/list-entry/1020447?section=official-list-entry;</p> <p>In line with paragraphs 189 and 190 of the NPPF, we would recommend that the part of the allocated area of H15 that incorporates the scheduled area should be removed, as there is no apparent justification for including it. “Intensification” is not clearly defined, and it is not clear if this includes the construction of new buildings, services and other infrastructure. Depending on the scope for any development, this has the potential to harm the significance of the scheduled monument owing to development in its setting, and the allocation does not appear to be supported by a heritage impact assessment that justifies this. We note that the policy aims to safeguard the scheduled monument, which is welcome, but we recommend this is strengthened to include a requirement for any proposed development to be informed by pre-determination archaeological evaluation, owing to the proximity of the scheduled monument and the likelihood of significant archaeological remains. (Historic England)</p>	<p>agreed and wording for the supporting text.</p> <p>The site boundary should be amended to exclude any part of the Scheduled Monuments.</p>	<p>‘The retention of the existing employment site at Abbey Farm (0.95hectares) identified in Figure N and on the Policies Map will be supported. Uses should be restricted to those that can be carried out in a residential area without detriment to its amenity such as identified in Use Class E (c) and Use Class E(g).</p> <p>The site adjoins Scheduled Ancient Monuments to the east, south and north west. Any development proposals should safeguard these designations and be supported by a Heritage Impact Assessment.</p> <p>The site is also likely to have significant archaeological interest and planning applications should be supported by an archaeological assessment, including the results of fieldwork where appropriate. This assessment should cover the whole site not just that part adjoining Scheduled Ancient Monuments.</p> <p>Proposals should be discussed with Historic England and with Suffolk County Council Archaeology Services at an early stage.’</p> <p>Refer to footnote 68 of the NPPF re need to cover area outside of scheduled area in any archaeological assessment in the supporting text.</p>
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		Amend boundary to exclude any part of the ancient monuments.
This should be re-numbered to policy HOX 15. Turning the last sentence into a new paragraph would be a simple but effective tweak, and will help emphasise this requirement. (MSDC)	Agreed	Amendments set out above
They seem to say they will avoid affecting the SAM, but this would be much easier if the allocation site did not include any of the SAM. It may not be impossible as shown, but it would be several degrees more complicated bureaucratically. I was also trying to point out that the former Claret site probably hasn't been surveyed, and may be just as interesting as the SAM. It would only have been excluded because it had buildings on it. Most of it is just covered in concrete pad, so anything below ground may be well preserved. (MSDC Heritage)	MSDC consulted on revised policy	Amendments set out above
Although outside of the Scheduled Areas, the site of Abbey Farm is still within the area of Hoxne Priory, and applications for potential developments should be supported by archaeological assessment, including the results of fieldwork where appropriate to proposed impacts. Proposals should be discussed with Historic England and with SCCAS at an early opportunity.(SCC)	Agreed – add new wording to require archaeological assessment.	Amendments set out above
Chapter 6		
Policies A and B		
Having 'non-policy' objectives in your Plan is acceptable but, for clarity, these should be presented differently. • Change	Community Policy used in other plans. Agreed to show differently	Amend presentation of community policies

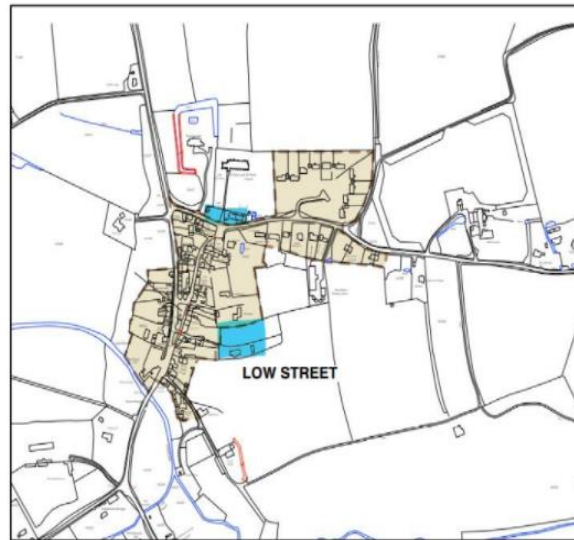
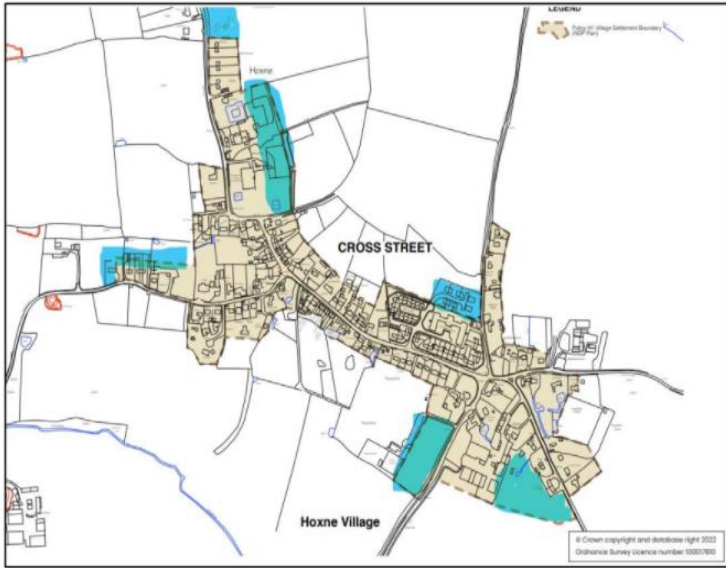
<p>the titles to read Community 'Action' rather than Community Policy. [Nb. remember to update the contents page]. • Present these boxes in a different colour (maybe blue or green). (MSDC)</p>		
<p>Active travel There are no specific requirements in the plan regarding encouraging sustainable and active transport. Community Policy B Quiet Lanes is welcomed, as a measure to encourage more active travel such as walking and cycling. There are environmental and health impacts of development by promoting sustainable transport and links to accessible public transport and encourage active travel. Please see the Transport section of this letter for further information on Quiet Lanes. We welcome Community Policy A Traffic Management reducing the impact of through traffic during construction and Quiet Lanes for cyclists and pedestrians. (SCC)</p>	<p>Specific opportunities to implement proposals for active travel have been examined but are not possible given the geography of the village.</p>	<p>No amendment</p>
<p>A sustainable transport policy should be included, setting out the requirements and aspirations for sustainable travel in the village - this could include PROWs. Would also be useful for SCC Highways to help secure any improvements. Other neighbourhood plans have used a 'Key Routes' policy approach to highlight the most important pedestrian and cycle routes and requiring that development connect to and enhance these. The policy could also list where the community feels improvements may be needed for improved pedestrian/cyclist access or safety. These seem to have been addressed in Supporting Document 10, however this document is not referenced in any planning policies, missing potential for development to address what is in this document. (SCC)</p>	<p>As above</p>	<p>No amendment</p>
<p><i>Community Policy A</i></p>		
<p>Please note that the County Council is currently undertaking a county-wide review of HGV movement routes. Community</p>	<p>Noted</p>	<p>N/A</p>

views are being sought and we would recommend the parish highlights any concern at the link in the footnote, so that it is captured in the review. (SCC)		
<i>Community Policy B</i>		
It is important to note that there is a criteria to follow for Quiet Lanes, where a speed and volume of traffic survey needs to show low speeds and little use. Quiet Lanes are not traffic calming or speed reducing measures – they are there to advise drivers of other road users such as pedestrians, cyclists, and equestrians. (SCC)	Noted	N/A
<i>Chapter 7</i>		
<i>Policy 16</i>		
Early Years Hoxne falls within the Hoxne and Worlingworth ward. In Hoxne there is a surplus of 16 Full Time Equivalent places, which reduces to 13 places with approved planning applications. Given the low number of dwellings proposed in the neighbourhood plan, these can be accommodated within our existing surplus, and no mitigation is required at present. (SCC)	Comment noted	N/A
Primary Education - At the moment, based on current forecasts and accounting for approved applications, St Edmund's Primary School is forecast to have surplus places at the end of the forecast period based on 95% capacity. Taking into account the local plan site allocation at 30 dwellings, the school is expected to reach 95% capacity. However, if the development at Shreeves Farm is brought forward at 38 dwellings, and if H14 is developed as well, we would expect the school to exceed 95% capacity. A representative from SCC Education department has met with the primary school and Academy Trust regarding proposals for additional land. SCC is content for specification of the size requirement of 0.4ha of land to be removed from Policy 13 and paragraph 5.9. It is suggested the	Agreed that LGS not compatible with school requirements. Agreed that the policy should refer to 0.12 hectares rather than 0.4 hectares Noted that this land needs to be safeguarded	Delete LGS on land adjacent to the school. Amend Policy 13 to refer to 0.12 hectares Include the safeguarding land in the Policy 13 policy area – see above.

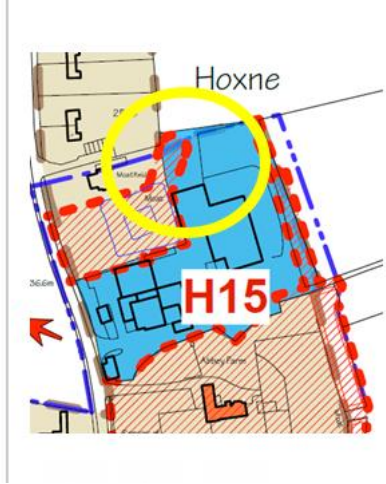
<p>neighbourhood plan instead safeguards the 0.12ha of land bordered in yellow on the map below for educational purposes. It should be noted that this safeguarding may not be compatible with the Local Green Space designation on this land in Policy Hoxne 5 and may restrict ability of the school to fully utilise the land. As such the Neighbourhood Plan Group should consider removing this designation. (SCC)</p>		
<p>Secondary Education Hartismere School is the catchment secondary school and is forecast to exceed 95% capacity during the forecast period. The proposed strategy for mitigating this growth is via future expansion of existing provision. (SCC)</p>	<p>Comment noted</p>	<p>N/A</p>
<p>We note that the plan recognises the benefits that accrue to Parish Councils via CIL, where those Councils that have a Made neighbourhood plan are able to receive 25% of the levy for developments in their area. We would recommend that the plan considers whether there are any elements of the historic environment that could be supported through this mechanism, especially where there is local heritage at risk or in poor condition. (Historic England)</p>	<p>Noted – HPC will consider how to use its increased CIL allocation in due course.</p>	<p>N/A</p>
<p><i>Policies Map</i></p>		
<p>The first Policies Map on page 34 is highly detailed and hard to read at this scale and has no key/legend. It also states “Insert Map” which we believe should say “Inset map” The second Policies Map is clearer to read, however the Legend on page 35 cuts off the end of the label of the green hatching, which is currently labelled as “Ploicy H6 Area of Local Landscape sensi’ which needs to be amended. (SCC)</p>	<p>Agreed – should be inset map Agreed that Policy H6 label needs correcting</p>	<p>Make amendments to the Policies map</p>
<p><i>Supporting Document 9</i></p>		
<p>Neighbourhood Plan Design Code In paragraph 2.3 on page 10 we would suggest referring to the significant network of PROW in and around Hoxne and part of the landscape and local green infrastructure. We are pleased to see reference</p>	<p>The Design Code was prepared by AECOM and cannot be amended</p>	<p>No amendment</p>

<p>to PROW feeding into the village from the surrounding countryside at paragraph 2.6 on page 12, and also the suggestion that PROW should be used to improve links between the village and the surrounding countryside and links between local space on page 32. We support the aim of encouraging walking and cycling by establishing routes on PROW, however we would have liked to have seen a map showing the local PROW network. (SCC)</p>		
<p>The Design Code supporting document should be compatible with existing SCC highways standards to ensure that the design code does not make new development unsuitable for adoption by the Highway Authority. It appears to generally accord with our forthcoming draft Suffolk Design: Streets Guide⁹ document but this document should state that road and footway layouts should also accord with Local Highways Authority requirements to ensure they are acceptable to the LHA with regard to road adoption. (SCC).</p>	<p>As above</p>	<p>No amendment</p>
<p>We also note that page 81 of the Design Code indicates a total of 50 dwellings over the two sites (15 at Denham Low Road and 35 at Shreeves Farm), however Shreeves Farm has been allocated for 38 dwellings according to Policy 13. (?Historic England?)</p>	<p>As above – the Design Codes was drafted while the HNDP was being prepared and is not therefore always consistent with the final plan which takes precedence.</p>	<p>No amendment</p>
<p><i>Supporting Document 10</i></p>		
<p>All new housing developments should have, where reasonably possible, new footpath and/or bridleway connections created, linking to the existing right of way network surrounding the village On page 1 paragraph 4, it is suggested to include the following: “Considering whether development could link up with the existing public rights of way network, or could be an opportunity to create new routes.” We are pleased to see reference to pedestrians and cyclists in this document and fully support the objective of increasing opportunities. There could be reference to other</p>	<p>To much detail to be included in the Plan but add some detail to Supporting Doc 10 – Transport. A new policy on PROW to be added – see above.</p>	<p>Amend SD 10 to include the references suggested.</p>

<p>strategies that support this Neighbourhood Plan. This includes Suffolk County Council's Green Access Strategy (2020-2030)⁶. This strategy sets out the council's commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working. (SCC)</p>		
<p>For Supporting Document 10 Traffic & Transport, SCC is fully supportive of the development related aspirations identified, including the pedestrian access improvements that SCC have previously commented on for Denham Low Road and the Primary School. (SCC)</p>	<p>Noted</p>	<p>N/A</p>



Provided with MSDC comments on settlement boundary



Provided with MoD comments on safeguarding routes