

Informal Feedback from Babergh District Council on early draft Reg 15 Long Melford NP (v.P22) - 17 June 2021 and Responses to this from LMNP Steering Group.

NOTE: The comments below from Babergh DC were prepared jointly by Paul Bryant (N'hood Planning Officer) & Jen Candler (Senior Policy Planner). They comprise 'Thoughts / Comments' at that stage and, where appropriate, a list of further 'Actions needed' following an informal review of the version P22 Long Melford Neighbourhood Plan ('the LMNP of the Plan') carried out in early June 2021. Some replicated previous issues or concerns, while others were new given that both the LMNP and the emerging Babergh & Mid Suffolk Joint Local Plan (JLP) had both moved on since the LMNP had been published for Reg 14 Pre-submission consultation in early 2019. The comments also reflected other discussion that had taken place in the interim period.

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| General comment | <ul style="list-style-type: none"> • There are a many specific references to policies in the Reg 19 Pre-submission draft Joint Local Plan (JLP). We remind you that these policies are themselves still subject to change ... <i>although we hope not</i> ... so something to bear in mind. • In places, the use of semi-colons where a full-stop and new sentence seem more logical e.g., end of para 4.66 • When cross-referring in one NP Policy to other NP Policies, it may be easier to just use the reference numbers. • There is no Glossary. Is that intentional? | | <p>Noted.</p> <p>Yes, intentional, no need.</p> |
| Front Cover | Might be helpful to add a date stamp, e.g., 'Spring 2021' or 'May 2021' whichever you feel comfortable with. | For consideration. | Amendment made. |
| Policy numbering | You have already simplified policy numbering following our earlier request (thank-you) but, with regard to Policies LM2 to LM7 , still think you can go much further by ditching the 'Allocation of Sites for Development' wording. Suggest ... | <p>For action.</p> <p>NOTE: The change to LM7 would also remove the confusion as to whether this site is '<i>Land East of</i>' OR '<i>Land West of</i>' Rodbridge Hill because you have text that says one thing and a map (Map 4H) that says something different.</p> | Amendment made. Indigo Ross asked to amend map titles. |

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| | <ul style="list-style-type: none"> • LM2: Land at Spicers Lane (1 dwelling) • LM3: Land at Cordell Road (3 dwellings) • LM4: Land rear of Bull Hotel (3 dwellings) • LM5: Land in Borley Road (10 dwellings) • LM6: Land West of High Street (30 dwellings) • LM7: Land opposite Ropers Way (30 dwellings) <p><i>For clarity, any further references to these sites should preferably use their 'LM' policy number and not their site assessment reference number from Map 4A.</i></p> | | |
| Para 1.4 | Second sentence. Suggest: <i>"As well as shaping where development will go, this Plan can also influence the components of development and the associated infrastructure."</i> | For consideration. This is an important role for NPs. This would also be consistent with the text in para 3.16. | Amendment made. |
| Para 1.11 & Map 1A | <p>Advise using the NP Area Map on our website, and which you used in your Reg 14 Pre-submission draft NP.</p> <p>NB: The Needham Market NP Examiner recently commented that their NP needed to be modified as follows: <i>"Change the map of the Plan area to ensure the boundaries of the Plan area are clearly defined."</i></p> | Change the maps on pages 8 and 12 (both are labelled Map 1A). | Amendment made. |
| Para 3.17 - 3.18 | Not clear what the 'Vision' of this Plan is. <i>Qstn: Is it the second sentence in para 3.16, or is it the statement at the head of page 29?</i> | Consider doing what others do, i.e., put the vision into its own text box so that it is clear to all. | Amendment made. |
| Map 3A | There is no cross-reference to this map in the supporting text. | Include a suitable cross-reference. | Done. |

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| Para 3.27 | It is noted that there is no infrastructure specific objective. It may be helpful for referencing in future CIL bids to have an infrastructure objective or reference to infra in (j). | For consideration. | Amendment made. |
| Para 4.4 | Formatting ... | Insert line space before start of para 4.4 | Done. |
| Para 4.5 | This para states that the plan has allocated six sites for housing, one of which is for mixed employment and housing use. The LMNP also needs to acknowledge the housing numbers which are already committed, even if it is not allocating those sites. | Suggest: <i>"In pursuit of these objectives, and in addition to those sites that already benefit from planning permission and/or are allocated in the emerging Joint Local Plan, this Plan has allocated allocates five six sites for housing, and one site of which is for mixed employment and housing use whilst the rest are just for housing. All of these site allocations are identified in this chapter."</i> | Amendment made. |
| Para 4.10 | Second bullet: <i>'controls on the pace of housing delivery'</i> . This is not evidenced in policy. | | Amendment made. |
| Para 4.15 [Para 3.24] | A reminder that the 'functional cluster' concept is not carried forward into the JLP. The concept itself is not explained / defined anywhere in the NP and, therefore, the reference will cease to be clear or valid when the Babergh Core Strategy is superseded. The suggestion in the second sentence that JLP policy SP03 specifically relates to 'functional clusters' is misleading. | Consider re-wording the second sentence in para 4.15. | Amendment made to all references to 'functional cluster'. |
| Para 4.20 | Formatting ... | Place hyperlinks with relevant reference, and not at the end. | Done |

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| Map 4a | Map 4a appears on pg 34 but is not explained until para 4.25 on pg 36 | Move the map so that it relates better to supporting text. | Done. |
| Para 4.31 | Agree with position on Chilton Woods. However , this is then contradicted in policy LM15 (see comments below on LM15) | | Noted but paragraph 4.31 still viewed as accurate. Policy LM 15 amended. See below. |
| Para 4.33 | Grammar. | Suggest: “ K1 is owned by a charity which is who are working with a developer to have the site developed bring the site forward and to maximise the amount of affordable housing and the housing for local people.” | Amendment made. |
| Map 4B | For ease of reference etc., we would ideally want to see the Policies Map occupy a whole page. Standard practice is to also put the Policies Map at the back of the Plan. The built-up area boundary [we advise you to use the term ‘settlement boundary’ to be consistent with JLP terminology] also differs considerably from that set out in the emerging JLP, especially in the area around Westgate Street and north from here. <i>QSTN: Do you really want to include, for example, ‘The Green’ within the settlement boundary?</i> | A larger / relocated Policies Map. Further thought given to the Settlement Boundary. Our recommendation would be that you adopt the one used in the JLP, but redrawn by you to include, where appropriate, the sites you are allocating. That would put ‘Harefield’, ‘The Green’ and the area along the B1064 immediately adjacent to Melford Hall outside of the settlement boundary and thus offer them more protection. | Map 4B to become full page and ‘BUAB’ terminology changed to ‘Settlement Boundary’. New Map 4B (being) arranged, starting with JLP Settlement Boundary and then adapted to include allocated sites. |
| LM1 | We note that the policy wording follows our previous advice but, on reflection, it needs to be more specific about showing that this Plan has met the minimum housing requirement, thus avoiding any potential non-conformity issue at examination stage. A more ‘spatially relevant’ opening paragraph is also included | Recommend amending LM1 to read as follows: <i>“The Neighbourhood Plan area will accommodate development commensurate with Long Melford’s designation as a Core Village in the districts’ adopted settlement hierarchy.</i> | Amendment made but after telephone consultation with BDC, roman numerals iii) and iv) have been removed from Policy box as we do not wish NP Policy to invite windfall development or further applications from outside the Settlement Boundary (whilst accepting that both are almost certain to ensue). Site classification codes retained with |

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| | <p>given that you do not have a separate policy on this.</p> | <p><i>The focus for any new development will be within the settlement boundary as defined on the Policies Map</i></p> <p><i>This Plan itself provides for around 445 dwellings to be built over the period 2018 to 2037. This growth will be met through:</i></p> <p><i>i) the implementation of outstanding planning permission not completed at 1st April 2018 and the allocation at Station Road set out in the Joint Local Plan;</i></p> <p><i>ii) the site allocations identified in policies LM2 to LM7 of this Plan, and on the Policies Map (which will provide for around 77 new dwellings)</i></p> <table border="1" data-bbox="1032 751 1496 1241"> <tbody> <tr> <td data-bbox="1032 751 1263 900"> <ul style="list-style-type: none"> • <i>LM 2: Land at Spicers Lane (1 dwelling)</i> </td> <td data-bbox="1263 751 1496 900"> <ul style="list-style-type: none"> • <i>LM 5: Land at Borley Road (30 dwellings)</i> </td> </tr> <tr> <td data-bbox="1032 900 1263 1048"> <ul style="list-style-type: none"> • <i>LM 3: Land at Cordell Road (3 dwellings)</i> </td> <td data-bbox="1263 900 1496 1048"> <ul style="list-style-type: none"> • <i>LM 6: Land west of High Street (30 dwellings)</i> </td> </tr> <tr> <td data-bbox="1032 1048 1263 1197"> <ul style="list-style-type: none"> • <i>LM 4: Land rear of Bull Hotel (3 dwellings)</i> </td> <td data-bbox="1263 1048 1496 1197"> <ul style="list-style-type: none"> • <i>LM 7: Land opposite Ropers Way (30 dwellings)</i> </td> </tr> </tbody> </table> <p><i>iii) small windfall sites and infill plots of one or two dwellings within the settlement boundary that come forward during the Plan period and are not identified in this Plan;</i></p> | <ul style="list-style-type: none"> • <i>LM 2: Land at Spicers Lane (1 dwelling)</i> | <ul style="list-style-type: none"> • <i>LM 5: Land at Borley Road (30 dwellings)</i> | <ul style="list-style-type: none"> • <i>LM 3: Land at Cordell Road (3 dwellings)</i> | <ul style="list-style-type: none"> • <i>LM 6: Land west of High Street (30 dwellings)</i> | <ul style="list-style-type: none"> • <i>LM 4: Land rear of Bull Hotel (3 dwellings)</i> | <ul style="list-style-type: none"> • <i>LM 7: Land opposite Ropers Way (30 dwellings)</i> | <p>allocated site Policy titles for easy cross-reference to Call for Sites.</p> |
| <ul style="list-style-type: none"> • <i>LM 2: Land at Spicers Lane (1 dwelling)</i> | <ul style="list-style-type: none"> • <i>LM 5: Land at Borley Road (30 dwellings)</i> | | | | | | | | |
| <ul style="list-style-type: none"> • <i>LM 3: Land at Cordell Road (3 dwellings)</i> | <ul style="list-style-type: none"> • <i>LM 6: Land west of High Street (30 dwellings)</i> | | | | | | | | |
| <ul style="list-style-type: none"> • <i>LM 4: Land rear of Bull Hotel (3 dwellings)</i> | <ul style="list-style-type: none"> • <i>LM 7: Land opposite Ropers Way (30 dwellings)</i> | | | | | | | | |

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| | | iv) <i>conversions and new development opportunities outside the settlement boundary in accordance with National and District Level policies.</i> | |
| LM3 & LM4 | <p><i>'The housing is to be reserved for occupants over 55 years of age'</i></p> <p>We are still unclear how will this occupancy restriction will be managed on what are effectively commercial (open market) housing sites.</p> | Consider providing some explanation if not already set out in the NP or in any supporting evidence. | <p>Phrase in LM 3 "The housing is to be reserved for occupants over 55 years of age" has been amended as follows: "The housing is to be reserved, by a condition attached to the planning consent, for occupants over 55 years of age.</p> <p>Same change made in LM 4.</p> |
| LM3 & LM 4 | <p>Some thoughts / questions:</p> <ul style="list-style-type: none"> • Are the references in paragraphs 4.48 and 4.55 to these sites being '<i>unsuitable</i>' in terms of Policy LM25 contradictory? • How would the employment uses be safeguarded? Support for relocation does not necessarily equate to this. A non-conformity issue with 2006 Local Plan Policy EM24 & emerging JLP Policy LP13 – unless support is subject to these provisions being met (paras 4.49 & 4.56) | Consider and make amendments as necessary. | <p>Policy LM 25 amended by adding the following phrase to the end of the second bullet: "Such unsuitability may also be demonstrated by this Plan."</p> <p>On the basis of local evidence presented in the Justification for Policies LM 3 and LM 4, the case is made for the proposed changes of use. LP 13 in the JLP is a local, not strategic, policy; the NP is adopting a different approach in these cases on the basis of local evidence.</p> |
| LM5 | We note that this site is not expected to deliver any affordable housing | | Noted. This is deliberate. |
| Paras 4.64 & 6.22 Special Landscape Areas | <p>Both paragraphs refers to the Special Landscape Area (SLA) designated in the 2006 Babergh Local Plan.</p> <p>We are confident that this has been mentioned to you, at least verbally if not in</p> | <p>Reference to SLA will no longer be relevant as JLP progresses to adoption.</p> <p>Consider changing the reference OR provide your own justification for retaining the SLA by setting this out in a relevant policy. See links</p> | Paragraph 4.64 amended to read: " The site is within a Special Landscape Area, but The site is well screened by trees on the north and west boundaries, enabling the impact of any development on nearby countryside to be |

| Ref | Thoughts / Comments | Action needed | LMPC Response |
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| | <p>writing, and we are also mindful that there are no specific policy reference to SLAs, but we remind you that these designations are not being carried forward into the JLP and so will effectively be lost.</p> | <p>below for the recent examples of retaining the designation:</p> <p>Assington NP, Chapter 8 & Policy ASSN12 & Exam Report comments</p> <p>Lt Waldingfield NP, Chapter 7 & Policy LWD7 & Exam Report comments</p> | <p>minimised. Special Landscape Areas were designated in the Babergh Local Plan Alteration No.2, 2006.</p> <p>Paragraph 6.22 amended to read: The River Stour, its tributary the Chad Brook, and associated floodplains, provide natural green corridors through the village. and the basis for its Special Landscape Area classification. Long Melford accounts for a high proportion of the Special Landscape Areas designated in the Babergh Local Plan Alteration No.2, 2006, para 6.24 — this is reproduced below with Long Melford parts picked out in italics:</p> <ul style="list-style-type: none"> • <i>the Stour Valley from Long Melford to the Dedham Vale Area of Outstanding Natural Beauty;</i> • <i>an area south of Bury St Edmunds;</i> • <i>the valleys of the rivers Glem, Box, Brett and Chad Brook;</i> • <i>the Dodnash area;</i> • <i>parts of the Gipping Valley and areas to the west of it; and</i> • <i>the historic parklands of Melford Hall, Kentwell Hall and the former Tendring Hall.</i> |
| LM6 | <p>Third para: “<i>local people being as defined in the Hamilton Trust... [what]”?</i></p> | <p>Check wording in third paragraph and note the other points.</p> | <p>The default provision if the land is no longer in the hands of the Hamilton Trust is Policy LM 10. The provision will also be written into any planning consent, which will run with the land.</p> |

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| | <p>How robust is half of the affordable housing being for local in the unlikely event that the land changes hands?</p> <p>The re-worded policy appears to have addressed some of the earlier concerns raised by the Council's Heritage Officer, but they may choose to comment further if they feel it has not gone far enough?</p> | | Heritage – noted. |
| Para 4.67 | <p>Inconsistent statement. As you have drawn it, Map 4B on pg 39 (the Policies Map) and the implications of Policy LM1 clearly place this site within the settlement boundary being promoted through the LMNP.</p> <p>By stating here that the site is located beyond but adjacent to the settlement boundary implies that it is being treated as a rural exception site. As we said before, you cannot allocate a rural exception site.</p> | Amend wording to remove the ambiguity and comply with other policies/ maps in this Plan. | Paragraph 4.67 amended to read: “The constraints of the site are its distance from village facilities and heritage concerns, and its location beyond but adjacent to the Built Up Area Boundary. ” |
| Para 4.71 | This paragraph does not adequately address the planning balance when the extent of harm has not been assessed, rather it is assumed. | | The NP only says: “it is unlikely that this proposed development would cause even ‘less than substantial harm’ to the Kentwell heritage asset” which accepts that the harm has yet to be measured; no change. |
| LM7 (see also LM11) | <p>It is unclear how the requirement for ‘<i>less expensive house types</i>’ would work in reality. In this context, less expensive is a matter of perception. As worded, LM11 does not help either.</p> <p>Has there been any detailed viability appraisal of the proposals?</p> | Reconsider approach to what is meant by less expensive house types. | Second sentence of Policy LM 11 amended to read: “Access to housing is to be achieved not through a direct subsidy, but through the selection of house types to be developed in the scheme to include two- and three-bedroom and terraced houses and flats.” |

| Ref | Thoughts / Comments | Action needed | LMPC Response |
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| LM8 | <p>Qstn: How robust is the cap of 30 dwellings? It would not be reasonable to refuse applications if they came in above this unless there was harm.</p> <p>We note para 4.77 provides some justification but, if the policy requirement remains, this may come under scrutiny at Examination stage.</p> | | <p>Second sentence of paragraph 4.77 amended as follows: “The National Planning Policy Framework (NPPF) paras 68 and 69 and the Parish Council support smaller schemes which provide opportunities for smaller builders and developers who are more likely to build out their schemes within a reasonable time period.”</p> <p>New sentence added at the end of para 4.77: “The proposed cap on the scale of individual schemes does not compromise or limit the overall scale of housing development that can be accommodated in the parish; this Plan provides for 77 more dwellings than the identified need, so is consistent with NPPF 2019 (paragraphs 11 and 35 a).</p> |
| LM9 & Para 4.79 | <p>On face value, an overly complicated policy. What we think you are trying to say (and the Council’s Strategic Housing Team may wish to comment further on this) is:</p> <p><i>‘On all qualifying sites, the expectation is that 35% of the dwellings shall be affordable unless it is clearly demonstrated to the satisfaction of the local planning authority that this would make the scheme unviable. In such cases, alternative on-site provision and/or an off-site financial contribution may still be required.</i></p> <p><i>Subject to the latest evidence of need, the affordable homes should be split 50:25:25 between Affordable rented: Shared Ownership: Starter Homes’</i></p> | For noting and possible action. | <p>Proposed wording adopted, after changing “Shared Ownership” to “Shared Ownership and Other Affordable Routes to Homeownership.”</p> <p>Thus “On all qualifying sites, the expectation is that 35% of the dwellings shall be affordable unless it is clearly demonstrated to the satisfaction of the local planning authority that this would make the scheme unviable. In such cases, alternative on-site provision and/or an off-site financial contribution may still be required.</p> <p>Subject to the latest evidence of need, the affordable homes should be split 50:25:25 between Affordable rented: Shared</p> |

| Ref | Thoughts / Comments | Action needed | LMPC Response |
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| | | | Ownership and Other Affordable Routes to Homeownership: Starter Homes” |
| LM10 | Questions remain over the requirement that 50% of all affordable homes being made available exclusively for local people and the Council’s Strategic Housing Team may wish to review the policy and comment further at the submission consultation stage. | Note the concern. | Noted. |
| LM11 Para 4.86 | <p>We cannot support the policy as worded given that affordability is not the correct justification for this policy and that it would be more NPPF compliant to state what is expected based on actual need (i.e., a policy that requires developers to build more of a particular type of house based on the number of bedrooms).</p> <p>Your original Reg 14 LM H-13 Size & Types of House policy was better but our comment at the time was that, as it was worded, it read more like a statement than a plan policy.</p> <p>Presumably, you have the evidence to justify that there is a higher demand for, for example, 2-bed and 3-bed houses, so make that clear by doing what other NP groups have done and have a straightforward, easy to follow, appropriately justified ‘Housing Mix/ policy.</p> | Note the objection, look at your evidence and what other NP Groups have done and re-write the policy accordingly | Policy has been amended. (See section above on Policy LM 7). |
| LM13 | This policy could be strengthened substantively by requiring a 10% net gain but that may also require sufficient justification and questions around how the net gain will be measured. | As a minimum, suggest amending first sentence to read: <i>“Within development proposals, design features which provide net gains to in biodiversity will be encouraged.</i> | First and last sentences of Policy LM 13 amended as follows: “Within development proposals, design features which provide net gains in biodiversity will be encouraged.” |

| Ref | Thoughts / Comments | Action needed | LMPC Response |
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| | | <p>In the last paragraph, the very specific reference to the Reg 19 JLP is not needed. Why not simply state: <i>'The Parish Council also endorses the hierarchical approach set out in Policy LP18, para 1 of the BMSDC Joint Local Plan'</i> [Noting of course that this policy / policy number could itself change as a consequence of the JLP Examination]</p> <p>Remove duplication in the third sentence ('gardens etc.').</p> | <p>"The Parish Council also endorses the hierarchical approach set out in Policy LP18, para 1 of the BMSDC Joint Local Plan."</p> <p>Gardens comment noted but the NPSG considers this sentence is not a duplication.</p> |
| LM14 | <p>We have consistently said that we cannot support this policy. We do not believe it to be NPPF compliant, and it is contrary to para 4.94 because it represent an extensive tract of land. We have also expressed an opinion that this might come down to a ruling to made by your NP Examiner but it would be preferable if it did not get to that stage as it may reflect poorly on us both.</p> | <p>Strongly advise deleting the policy etc. An amendment to Policy Map 4B would also be required.</p> | <p>The phrase 'an extensive tract of land' is taken from para 100 c of NPPF 2019, which relates expressly to Local Green Spaces. We have expressly stated in para 4.94 that the PC is not relying on NPPF paras 99-100 to justify this policy; the quoted phrase is considered not relevant.</p> <p>Apart from repeating their objection, the Council have not given the PC good reasons why the policy should be deleted. The Council appear not to have considered the policy on the basis of the justification that is given in the NP.</p> |
| LM15 Para 4.95 | Non-conformity issue / Inappropriate request. | <p>Amend the policy, and do not to refer to the 2017 JLP document which has been superseded.</p> | <p>Policy wording amended to remove reference to 2017 JLP document.</p> <p>The present proposals for Chilton Woods are as stated; they have however changed many times in the past and may change again. The</p> |

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| | <p>There are legal requirements that relate to the collation and allocations on 106 and CL contributions.</p> <p>SS0811, SS0904, SS0297 & SS1028 all form part of the Chilton Woods development, which is CIL exempt. It would therefore be unlawful to seek contributions for impacts not proportionate to or related to the proposal.</p> | | <p>PC simply wants to be prepared for any contingency that may affect land within the parish or which may generate effects within the parish.</p> |
| Map 5A | <p>Not referenced anywhere in the supporting text.</p> | | <p>Reference now made in Chapter 5.</p> |
| LM17 | <p>Formatting: Do not include hyperlinks within policies as these can easily become redundant. The instruction to refer to the latest SCC Parking Standards should be sufficient.</p> | <p>Remove the hyperlink from the policy.</p> | <p>Hyperlink removed from Policy Box.</p> |
| LM19 Para 6.26 | <p>Policy wording needs amending. See Actions opposite ...</p> <p><i>QSTN: Why do you have ‘Designated Local Green Spaces’ and ‘Other Green Spaces’ [para 6.26]?</i> We can see why you might want to identify Kentwell Hall Grounds’ and ‘Melford Hall Grounds’ in the latter category BUT why not designate ‘The Green’, ‘Little Green’ and the allotments as ‘Local Green Spaces’?</p> | <p>Based on current best practice in other NPs ...</p> <ol style="list-style-type: none"> 1. amend the policy to read: “The following Local Green Spaces are designated in this Plan and are identified on the Policies Map. {list all of the designated local green spaces}” 2. Add a closing paragraph that reads: “<i>Development in the Local Green Spaces will be consistent with national policy for Green Belts.</i>” <p>You can retain the justification table where it is, or you may want to move this an appendix in the NP BUT re-think what you want to designate as LGS and what you are happy to leave out. Provide the justification for any additions as appropriate.</p> | <p>Open spaces omitted from designation have sufficient protection; the list of spaces for designation or non-designation has been extensively debated in the planning team and with interested parties – the PC is satisfied with those designated and those omitted.</p> <p>The first amendment is accepted and has been made :</p> <p>“The following Local Green Spaces are designated in this Plan and are identified on the Policies Map:</p> <p>Harefield, Roman Way, Southgate Gardens (Green Frontages)</p> <p>Cordell Place (Central Green Area)</p> <p>Melford Walk</p> |

| Ref | Thoughts / Comments | Action needed | LMPC Response |
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| | | | <p>Country Park Stour Meadows South of Liston Lane Stour Meadows North of Liston Lane Sports and Recreation Grounds.”</p> <p>The second amendment is also accepted, subject to an amendment and has been made as follows:</p> <p>“Control of development in the Local Green Spaces will be consistent with national policy for Green Belts.”</p> |
| <p>LMC01 etc.</p> | <p>Again, opportunity to simplify things (and relevant also to contents page listing). Para 1.8 already explains that the NP has identified Community Objectives and that these are shown in different coloured boxes so, suggest ditching the words ‘Community Objective’ in each blue box and just go with:</p> <p>LMCO 1: Traffic & Parking Initiatives LMCO 2: EV Charging in Public Places LMCO 3: Healthcare Services LMCO 4: Supporting the School LMCO 5: Old School Car Park LMCO 6: Promoting Biodiversity LMCO 7: Reducing Carbon Emissions LMCO 8: Outdoor Play Equipment LMCO 9: Land for Allotments LMCO 10: PRow and Tourism LMCO 11: Green Cemetery</p> | <p>(See left)</p> | <p>Amendments mostly made except where acronyms used or where NPSG considers change to be a backward step relative to ease of reference by residents.</p> |