

CONSULTATION STATEMENT APPENDIX T

HALESWORTH NEIGHBOURHOOD PLAN 2021 - 2036 REG 14 PRE-SUBMISSION COMMENTS – LOCAL ORGANISATIONS AND STATUTORY STAKEHOLDERS

STAKEHOLDER	PAGE / POLICY NUMBER	NATURE OF REPRESENTATION	COMMENTS OF RESPONSIBLE BODY	ACTIONS TAKEN OR AMENDMENTS TO PLAN
<p><b>Cross &amp; Ram Solicitors Halesworth 18 Thoroughfare</b></p>		<p>I thank you for your email of 5 November inviting representations to be made in respect of the above Plan.</p> <p>As a long time resident of the town, employer in the town and owner of property in the town there are two major points that I would like to make:</p> <p>Supermarket development. There have been many attempts over the years to bring a second supermarket into Halesworth - obviously retailers believe there is a substantial market and, with existing Planning Consents indicating a substantial growth in the population of the town, this situation can only get more acute. It is the positioning of any such second supermarket that is crucial to the future of the town. Over the years there have been various attempts to obtain permission to construct a supermarket in the land between The Thoroughfare and Saxon Way (basically to the rear of No. 18 The Thoroughfare) which would take advantage of the associated parking and access to other shops. It is fundamentally important to the future of the town that any second supermarket development should take place within the centre of town and easy walking distance of The Thoroughfare. My nightmare scenario is that a second supermarket could be developed on the outskirts of the town (perhaps to the north on Norwich Road) and the patrons of that</p>	<p>Your comment on the supermarket is noted. A NP cannot determine whether a supermarket will be built or not. A NP deals with land use and therefore it includes suggestions as to what the long-term car park site could potentially provide for the town. Our conclusion in paragraph 6.21 was that the site should <i>not only provide a supermarket and parking. It provides an opportunity, through good design, to deliver a wider range of uses (including further retail space, workshops,</i></p>	

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		<p>supermarket would obviously park without charge in the supermarket car park. It is highly unlikely that such patrons would then drive into town and have to pay a parking fee to be able to visit other shops in the town. I feel that this would reduce the footfall of shoppers in The Thoroughfare dramatically and endanger the future of many businesses as a consequence. In other words, I feel that the second supermarket development needs to happen within the confines of the existing shopping area.</p> <p>The use of The Thoroughfare for vehicular traffic. While this is much improved by the partial pedestrianisation, there are various premises on The Thoroughfare that need to receive deliveries and also those that have their own parking facilities accessed from The Thoroughfare alone. Previous Highway Orders have facilitated the use of The Thoroughfare by vehicles for the benefit of properties that are able to provide parking facilities accessed from The Thoroughfare. It is obviously important for the benefit of such premises that The Thoroughfare should never be totally pedestrianised since this will prevent access to properties for all purposes - even time restrictions are a significant disadvantage to them.</p> <p>I would be grateful if these comments were included among the representations considered in connection with the proposed Plan.</p>	<p><i>housing and community uses), improved connectivity to the town centre and a high quality public open space.</i></p> <p>What is eventually provided will of course be determined through the planning process</p> <p>The Town Council has set up a working group to look further into making the Thoroughfare a safer and pleasanter place to shop. Residents and businesses are members. It is recognised that full pedestrianisation is not the aim because of the needs of those living and working there.</p>	

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<b>East Suffolk Travel Association</b>		<p>As the independent local association for train and bus users, we welcome the opportunity to comment on the Halesworth Neighbourhood Plan.</p> <p>We welcome the general aspirations of the Plan, including a reduction on car dependence. and making the town centre “a place where more people want to come and spend their time and support the local economy”.</p> <p>Policy HAL.ED2 :The tourism offer should indeed exploit the fact that Halesworth is “close to the coast but not on the coast”. Links along the Blyth Valley are key to encouraging tourism, as well as to the lives of local people. A bus service, in whatever form, has an important role here.</p> <p>Policy HALTM1 : Millennium Green is a key component of the tourism offer and its proximity on foot to the town centre and also to the railway station and Saxons Way bus stops are advantages. Indeed, there is scope for bus service improvements and the majority of bus services use Saxon Way.</p> <p>To suggest that it is “cut off from the town by Saxons Way” is in our view an over-statement . Even the main car park is only a short walk away. There can, however, be a problem at certain times with flooding in the underpass, and we are pleased that the Plan recognises this.</p> <p>There may be a case for an additional pedestrian crossing and better signage however, pointing out that Millennium Green is not just an open space but also part of the towns heritage, with New Reach and the Halesworth to Southwold Narrow Gauge Railway.</p>	Thank you, your comments are noted.	The redrafted Plan will identify the New Reach and the Narrow Gauge Railway within the Millennium Green as Non-Designated Heritage Assets

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		<p>We find the section on the walking route from the station to the town centre thoughtful and interesting. The station is both a gateway to the town and, with the soon to be expanded museum, a significant tourist attraction in its own right. Certainly, new hard landscaping , seating and planting on the town side of the station would be welcome, provided that it does not lead to a reduction in parking space for rail users &amp; cars. Better pedestrian access from the station to the New Cut and around the roundabout would also be welcome.</p> <p>We welcome the Plans comment that “The proposed through train to London will support the flexible home working economy” Furthermore, the possibility of resurrecting the proposal of a bus hub at Angel Link could be advantageous.</p> <p>Reference is also made to the need to improve Halesworth’s bus links with Norwich. We have suggested a two- hourly through service (and a separate Halesworth - Southwold link) It is disappointing that Suffolk CountyCouncil, in its recently published Bus Service Improvement Plan, does not apparently regard this as a priority; but we note that Plans suggestions that “it could be time for Halesworth to take a strategic look gain at its wider transport needs”.</p> <p>We hope that our comments are helpful.</p>		

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		Trevor Garrod Chairman		
<b>Hopkins Homes (local builder / developer)</b>		<p>Hopkins Homes note the content of the Draft Neighbourhood Plan and the considerable level of work and research which has formed the basis for the proposed Policies contained within it.</p> <p>Hopkins Homes are pleased to note the desire for increased levels of new, larger family housing detailed within the content of Paragraph 5.13 and the wording of proposed Policy HAL.HSG1. As the preceding paragraphs indicate, whilst Policy WLP8.1 of the Adopted Waveney Local Plan focuses upon a District-wide desire for smaller houses, by definition, this effectively discourages the development of larger family houses. It is therefore pleasing to note that this Policy seeks to actively rectify this.</p> <p>Whilst Hopkins Homes notes and generally supports the ethos of Policy HAL.DH1 in respect of 'Design', it is important the stated 'principles' are applied flexibly and not sought to limit the</p>	<p>Noted</p> <p>Noted. The Plan expresses support for</p>	

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		<p>use of alternative or innovative design approaches. As inferred, the key will be to ensure that all proposals exhibit a high standard of design quality.</p> <p>As the prospective developers of Waveney Local Plan Site WLP4.2 – Land South of Chediston Street, Hopkins Homes are seeking to create a high-quality, landscape-led residential development, with significant open space and tree planting to the west. Hopkins Homes therefore support the ethos of Policy HAL.DH2, with the requirement for development proposals of Site WLP4.2 to provide for a gradual transition from the rural countryside to the west, through to the more urban settlement form to the east, with suitable boundary planting and soft landscaping utilised to achieve this requirement.</p>	<p>contemporary design</p> <p>Noted</p>	
<p><b>Halesworth Business Group</b></p>		<p>We would like to thank the Neighbourhood Plan Group for the considerable work that has been undertaken in compiling the draft Neighbourhood Plan for Halesworth.</p> <p><i>(N.B. The following are the representations on the NP. The submission also included responses to the Connectivity Report prepared for the Town Council by We Made That architectural practice. These helpful and detailed comments were sent to WMT when received at the beginning of June 2021 prior to the closing of the consultation period on the proposals in that report. These were taken into consideration along with all other responses by WMT prior to finishing their report. The latter's high level proposals form part of the Town Centre chapter in the NP. The Business groups detailed comments will be most useful for when any of the proposals in the WMT report are given further consideration by the town council)</i></p>	<p>Noted thank you</p>	

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	<p>Page 4: Intro</p> <p>Page 11: Local context</p> <p>Page 12: 2.15</p>	<p>Plan Area - do the businesses have the opportunity for voting if they live outside the plan area? If not, why not if they have a long term lease on a property?</p> <p>was there structured consultation with the town centre businesses or ad hoc visits to them? Is the latter “consultation”?</p> <p>Empty shops were rare and this continues to be the case (at Dec 21). What is the basis of the comment?</p> <p>It should be noted that national multiples do not find Halesworth an attractive economically viable location owing to lower local resident and visitor footfall. The properties are attractive to independents which is much of the charm and attractiveness. As more choose to shop online for getting the best price, independents are reliant on those that don't and visitor footfall who support the local economies. Do you have data to suggest anything different? Unless it is a new development, can the local government really influence the balance of businesses, prices of products?</p> <p>Retail and services are not deemed low skilled in the current</p>	<p>The regulations governing neighbourhood planning is set by Government. Only those on Halesworth's electoral role will be able to vote in the referendum</p> <p>The Consultation Statement sets out the range of consultations undertaken.</p> <p>Observation</p> <p>A neighbourhood plan cannot determine what shops do and don't locate to Halesworth. Objective 7 of the plan is aimed at supporting the local economy.</p> <p>National occupational</p>	<p>Text in Plan will be updated.</p> <p>Reference to</p>

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	<p>Page 15: 2.17</p> <p>Page 18</p> <p>Page 21, 3.1: Chapter 3 Visions &amp; Objectives</p> <p>Page 60, 6.21:</p>	<p>times - this comment is offensive to the many skilled people in these industries. Most businesses in these sectors in Halesworth are independent run businesses which require a breadth of skills, knowledge and experience. There is perhaps confusion between low skilled and low paid?</p> <p>Perhaps the data is influenced by those that live in the defined area versus many of those employed in these sectors travel from further afield? As indicated on page 19 / travel to work (See also page 56 6.14)</p> <p>What is the evidence of a thriving creative industries? The Cut is a venue run as a charitable industry reliant on grant funding? Likewise the Gallery? There is not an arts infrastructure. The data comes under the heading Arts and recreation.</p> <p>See above comment about retail - this is badly worded implying that retail = low skill, low qualifications. Can you amend?</p> <p>Start-ups and micro businesses will not resolve jobs for low educational attainment residents. These businesses by their nature are small and require high levels of entrepreneurial skills. Do you have any different data?</p> <p>What was the evidence of consulting process for “a majority of the town centre businesses supported” a second supermarket</p>	<p>categorisations are used. These occupations do not require recognised qualifications. Halesworth’s business owners would be categorised as Directors or business owners</p> <p>Set out in the Evidence Paper. The Local Enterprise Partnership, ESC economic development. The charity run arts venue count as art infrastructure</p> <p>The text says, ‘in part’.</p>	<p>low skill to be reworded.</p> <p>These</p>

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	<p>Economic Development</p> <p>Page 88, 9.12 Movement &amp; transport</p> <p>Page 89, 9.15</p>	<p>in town?</p> <p>Is the old long term car park a suitable location to provide a 126m2 superstore and associated parking along with additional retail units, workshops, housing, community space and high quality open space? Is it also intended to include a bus terminus here too (9.9)? And cycle parking (9.43)? Will this be a safe site for all of the users?</p> <p>Additional and better signage would even out usage across parking areas - all traffic is currently directed to the central car parks. Visitors are not aware of the proximity of unsigned sites to the centre ie less than 5 minutes walk.</p> <p>The siting of a supermarket in the town centre will encourage more car usage as people will not walk or cycle with groceries. This contradicts other sections. Can you comment?</p>	<p>All these issues would be determined through the planning process.</p> <p>People have to buy their groceries somewhere. Many people commented that the present supermarket was too expensive and therefore they went to another town which creates more vehicle miles. A new supermarket in the town would create the potential for trips for</p>	<p>paragraphs to be updated and reworded.</p>

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	Page 104: Town Centre	See later comments on connectivity report which are relevant to this section. <i>(these comments refer to details in the Connectivity Report not the NP)</i> What were the concerns / evidence raised about the economic sustainability of the town centre?	shopping/community to be linked.  This is a national issue for small towns. See Evidence Paper.	
	Page 107	The New Cut - have the directors now been consulted for their input to the proposal as operators of the site?	Consultations on details will be held when appropriate which will be when there is the possibility of changes being made.	
	Page 108, 10.8	Development of the car park site (and the Market Place) will result in the reduction of car parking and access point to town centre businesses which opposes the objective to strengthen the economic sustainability of the centre? Isn't this contradictory? Can you comment?	Any new development would have to demonstrate that economic sustainability could be achieved. A supermarket would have to provide more parking.	
	Page 108, 10.9	The drawing indicates a pedestrian link to Angel Link???? Why has this been included?	This proposal would be a way of opening the other car parks to better usage.	
	Page 109	There were three options in the connectivity report - is the one presented agreed - is this misleading when there were other	The supermarket option was used as there was an	Text will be

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	<p>options?</p> <p>Page 110</p> <p>Page 111, 10.2</p> <p>Page 112, 10.16</p> <p>Page 116, 10.23</p>	<p>Limited Successful businesses. Narrow footways - see comments on connectivity report</p> <p>This is the junction Market Place / Thoroughfare. London Road starts further along. Can you amend?</p> <p>This is a dangerous junction with vehicles - is it appropriate for leisure / dwell seating? Where will the cafe(s) be located?</p> <p>See comments on connectivity report</p> <p>The data is now 5 years old and consumer and retailer habits have changed significantly. Do you have updated insights?</p>	<p>outstanding planning application and people had expressed interest in such a development. It is indicative only.</p> <p>Any changes would need the approval of Highways.</p> <p>This is valid background information for if and when any actions are taken to change traffic in the Thoroughfare. Prior to the publication of the Plan HTC had agreed to set up a working group to look</p>	<p>amended to make clear this was indicative.</p> <p>Name of roads amended. Text amended to make clear that any detailed scheme would have to address the issue of danger to pedestrians.</p>

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	<p>Page 117, 10.26</p> <p>10.27</p> <p>Page 118, 10.30</p> <p>General comments :</p>	<p>What is the evidence that the increase on online purchasing has driven the increase to the number of parcel deliveries? Surely these are dominated by deliveries to businesses?</p> <p>“The map creates more confusion” - the point of a map is to minimise confusion and positive comments have been received. Is it the location of the board which in itself provides some small scale attempt at connectivity from the thoroughfare?</p> <p>It talked to the need for Employment 3.1, Page 22 Provision of High Quality business spaces. Then we have Infrastructure Page 21 even stating that currently ‘poorly maintained outdoor play facilities &amp; open spaces’ which lends to my main concern as to the ongoing management of all these ‘Dwell areas’ , ‘Spaces’ etc</p> <p>Within the Neighbourhood Plan I was particularly interested in understanding further;  1.9 Retail Development  3.1 Employment – startups / micro businesses/provision of high quality business spaces</p>	<p>further into this issue. If further data is deemed necessary, then it will be undertaken.</p> <p>There are residents in the Town Centre and there is no reason to suggest that their levels of online shopping are less than other residents of the town.</p> <p>The map is in the wrong place as it does not connect to the Market Place</p> <p>Maintenance is not a planning issue but would need to be addressed if any changes come about.</p> <p>It is unclear what is being asked. The NPSG is more than happy to receive any specific queries on things in the Plan.</p>	

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	<p>General comments :</p> <p>General</p>	<p>Page 38 Businesses – recyclable/reusable products  Page 51 Economic growth plan supporting entrepreneurs, encouraging growth of existing businesses  Page 98 Leaflets- 2 walks</p> <p>I am perplexed about the proposed changes. Personally I like the town the way it is, and have lost count of the number of customers to my shop from outside Halesworth who tell me how much they enjoy visiting, and how lovely it is, and what a well-kept secret. However, there is one aspect of the town that really does need work, in my view, and that is the Town River. When I came to Halesworth 18 years ago the river flowed freely and both it and the Thoroughfare were home to many ducks. They were a common and delightful sight. Alas, the ducks have long gone - whilst we still have menacing signs about rats, which are now completely superfluous. The river has been neglected (on purpose) for some years, is nigh-on silted-up in parts and desperately overgrown in others, and looks a mess, apart from being a flood risk. I understand that people want to protect wildlife, as I do, but there is a limit. And it could be such an asset to the town! Picnics in the park, a punt on the river, a walk up to the Folly and, who knows, maybe at last a restored heritage steam railway. Now that would bring visitors into Halesworth — forget a massive supermarket.</p> <p>I have read the document (Town Centre Response) and am</p>	<p>Paragraphs 2.10 and 2.11 recognise the dilemma of some people wanting the opportunities that change will bring and some wanting the town to stay as it is. However, change is going to happen and the NP cannot stop that but it attempts to make those changes more sympathetic to the town as it is.</p> <p>The HNPSG met with the Environment Agency with regard to the river and their maintenance schedule is contained in their new Halesworth flooding factsheet online at HTC.</p> <p>If or when the proposals</p>	



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<b>Suffolk Preservation Society</b>	Para 8.25	Reference to Local Plan policy and Halesworth Conservation Area Appraisal	Noted. Reference to be added.	Text amended.
<b>East Suffolk Council</b>	Sect 4	Local Green Spaces: Assessment against NPPF criteria	Agreed. Updated in Environment Evidence Paper	
	Sect 4	HAL.ENV2 - Protection of open spaces: Evidence for process of identifying and justifying protection of these spaces	Noted. Further evidence will be drawn from Waveney Green Infrastructure strategy to justify designation	Text added
	Sect 4	HAL.ENV3 - Nature reserve: Process of identifying this area and ensuring that this is identified as an aspiration.	Noted. Updated in Plan	Text added
	Sect 4	HAL.ENV4 - Verges: Whether walking and cycling infrastructure is considered to represent necessary highway improvements	Agreed that this infrastructure would represent necessary highway improvements.	Policy HAL.EV4 to be amended to clarify.
	Sect 4	HAL.ENV5 - Heritage trees: Reference to para 180b of the NPPF and assessment of each tree. More information needed on each tree so it can be clearly identified.	Heritage trees are not the same as ancient woodlands or veteran trees; it is a local designation. The reference to para 180b of the NPPF	Amend reference to NPPF.

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			<p>is therefore confusing and an assessment against criteria that would be used to identify a veteran tree is not required.</p> <p>Further evidence in Environment Evidence Paper</p>	
	Sect 5	<p>HAL.HSG3: Low energy and energy efficient design: uncertainty over how renovation and enlargement is defined and how the policy is applied.</p>	Noted and agreed	<p>Policy HAL.HSG3 to be amended to exclude extensions and renovations.</p>
	Sect 5	<p>HAL.HSG1 - Provision of larger family housing: Provision of large family housing: justification of requirement for 15% 4-beds is not clear.</p>	<p>The figure reflects an appropriate balance and the words 'at least' provides flexibility. It is borne out of the market evidence as presented in the Housing Evidence Paper. Further justification will be provided in the Plan and Housing Evidence Paper.</p>	

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	Sect 6	HAL.ED1 – Small-scale commercial workspaces and micro employment areas: Para 6.9: threshold for micro-scale employment spaces	The point is acknowledged and it is recognised that the use of the word ‘micro’ is misleading. These are <u>small scale</u> employment areas, as evidenced by the 3 areas identified. The threshold for such sites is considered reasonable when it will potentially be occupied by some business that are larger than ‘micro’.	Amendments to Policy HAL.ED1 and supporting text.  References on Policies Map to be updated accordingly.
	Sect 6	Policy HAL.ED1A: Threshold for housing provision and protection of employment amenity.	Point is noted and a threshold will be included along with a requirement to protect amenity.	Amendment to Policy HAL.ED1A
	Sect 6	Policy HAL.ED1B: Move on space and loss of existing businesses.	Noted. This will be clarified and reference to loss of existing businesses will be removed as this could limit opportunities to provide move on space.	Amendment to Policy HAL.ED1B and supporting text
	Sect 6	Policy HAL.ED1D:	Noted and agreed. Clause	Amendment to

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		Various comments relating to the applicability of the policy as worded	to be amended and D3 to be removed.	Policy HAL.ED1
	Sect 6	Policy HAL.ED2 – Tourism and creative industries: Various comments relating to the practical application of the policy.	Noted and agreed. Policy to be amended.	Amendment to Policy HAL.ED2
	Sect 6	Policy HAL.ED3 – Major development opportunities: Various comments relating to tightening up the definition of major development and ensuring consistency in the policy wording.	Noted and agreed. Policy to be amended.	Amendment to Policy HAL.ED3
	Sect 7	Policy HAL.COM1 – Play facilities: Concern regarding downgrading Chediston Street NEAP to a LEAP and re-directing CIL funding.	Noted and agreed. Policy and supporting test to be amended	Amendment to Policy HAL.COM1
	Sect 8	Policy HAL.DH1 - Design: Various minor design comments	Noted and agreed. Policy to be amended.	Amendment to Policy HAL.DH1
	Sect 8	Policy HAL.DH2 – Views and gateways into and out of Halesworth town: Minor amendments	Noted and agreed. Policy to be amended.	Amendment to Policy HAL.DH2
	Sect 8	Policy HAL.DH3 - NDHAs: Various comments including questioning justification for including the Library as an NDHA.	Whilst the Library is 26 years old, the 30-year threshold is not an arbitrary one. Further evidence will be included in the plan to explain how the design of what is a landmark building directly	Further text added

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			intended to showcase the heritage of Halesworth, making it an important heritage asset.	
	Sect 9	Policy HAL.TM2 – Cycle parking: Comment relating to parking of non-standard bikes.	Noted and agreed. Policy to be amended.	Amendment to Policy HAL.TM2
<b>Suffolk County Council</b>	Sect 4	Page 2, para 2: Policy HAL.ENV3: historic considerations relating to nature reserve.	Noted and agreed. Text to be added.	Text added to Nature reserve section.
	Sect 8	Page 2, para 5: Para 8.24 – additional text on archaeology.	It is not clear how this information assists the plan and policy matters relating to heritage.	
	Sect 7	Page 2, para 9: Para 7.10 – reference to waiting list at Bungay High School.	Noted. Reference to be amended	Text amended.
	Sect 4	Page 3, section entitled 'Flooding': Flooding and Policy HAL.ENV4/HAL.DH1 – reference to SuDS	This is not considered necessary and is already addressed through the Waveney Local Plan/national planning policy.	
	Sect 2	Page 4, para 3: Health and wellbeing – amendment to text regarding roles of CCG and SCC	Noted. Reference to be amended	Text amended.

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	Sect 3	Page 4, para 5: Vision and objectives re. health	To amend the objectives at this stage would undermine the plan and no evidence has been presented that this is necessary for the plan to meet the Basic Conditions.	
	Sect 7	Page 4, para 9: Policy HAL.COM1 – suggested addition to restrict loss of play areas	This is supported but is already addressed by Local Plan Policy WLP8.23.	
	Sect 4	Page 5, para 3: Nature reserve access for walkers	Genuinely 'good quality pathways' would be a good asset but what such provision would entail could be open to interpretation. At this stage the focus is on securing the nature reserve and maximising its ability to thrive as such.	
	Sect 4	Page 5, para 11: Justification for Local Green Spaces only addresses special local significance.	Agreed. Updated in Environment Evidence Paper	
	Sect 4	Page 6, para 1: Sites in HAL.ENV2 meet criteria to be considered as Local	Disagree. Whilst they are important spaces to the	

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		Green Spaces.	community around them, it is considered that they do not meet the test of being demonstrably special to the community as a whole.	
	Sect 4	Page 6, para 3: Heritage trees – need for individual evidence for each tree	Noted. Further evidence provided in Environment Evidence Paper	
	Sect 4	Page 6, para 6: Biodiversity net gain	This is not considered necessary and is already addressed through the Waveney Local Plan/national planning policy.	
	Sect 9	Page 6, para 8: Policy HAL.TM1 – reference to PROWs.	The policy identifies Key Movement Routes. These are not PROWs. There is no reason why the policy should divert into addressing PROWs when they are already addressed through Local Plan/ national planning policy.	
	Sect 11	Policies Maps: - 'Amenity Green Space' should read 'Open Green Space'	Noted and agreed	Policies Map amended

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		- Primary Shopping Area displayed twice on key		