

Consultation Report

Barrow-cum-Denham Neighbourhood Plan

October 2024

Turley

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Please note that all of the appendices listed above have been published on the Barrow-cum-Denham Neighbourhood Plan website, along with this final consultation report. The website address is www.barrowsuffolknpc.co.uk

1. Introduction

- 1.1 This consultation report has been prepared by Turley Strategic Communications on behalf of Barrow-cum-Denham Parish Council.
- 1.2 This report summarises the activities undertaken in relation to the consultation on the Regulation 14 Pre-Consultation Draft of the Barrow cum Denham Neighbourhood Plan.

Consultation overview

- 1.3 The engagement undertaken has enabled the project team to gather feedback on the draft plan to inform the scope of the next stage of the Neighbourhood Plan before it is formally submitted to West Suffolk for further public consultation and examination.
- 1.4 To ensure all groups had the opportunity to view and comment on the plans, several engagement methods were used.
- 1.5 Engagement activities included: distribution of an information leaflet in the village newsletter; hosting a Neighbourhood Plan website and holding a drop-in community event.
- 1.6 The Neighbourhood Plan consultation period took place between 12 September and 24 October 2023.
- 1.7 A total of 197 forms of feedback have been received including 97 online feedback forms, 30 hard copy forms and 70 emails/letters.
- 1.8 All of the feedback received as part of the consultation has been considered and will help inform the scope of the next stage of the plan.

Statutory Bodies Consulted

- 1.9 The following statutory bodies were consulted:
 - West Suffolk Council
 - Suffolk County Council
 - Historic England
 - Natural England
 - The Environment Agency
 - The Homes and Communities Agency - no response received.
 - Guildhall & Barrow Surgery

2. Community Engagement

- 2.1 The consultation period was held between 12 September and 24 October 2023.
- 2.2 Engaging with the community was focused on the distribution of a newsletter, hosting a project website, and holding a drop-in exhibition. Further details on these activities are summarised below.

Consultation leaflet

- 2.3 A leaflet was included in the September 2023 edition of the Barrow village NewsLink newsletter.
- 2.4 The leaflet provided an overview of the Neighbourhood Plan consultation, information about the drop-in event, key contacts and a feedback form.
- 2.5 The leaflet was also included on the Barrow-cum-Denham parish council [website](#).
- 2.6 A copy of the leaflet is included at **Appendix 1**.

Neighbourhood Plan website

- 2.7 A project website was launched at www.barrowsuffolkNP.co.uk on 12 September 2023.
- 2.8 The website included:
- An introduction to the Neighbourhood Plan
 - A downloadable copy of the draft plan
 - Information about the drop-in event and where copies of the plan could be viewed in-person
 - A downloadable copy of the exhibition boards
 - Interactive feedback form

- 2.9 Throughout the consultation period, the website received over 617 page views by 337 unique users.
- 2.10 Screenshots of the website are included at **Appendix 2**.

Drop-in event

- 2.11 A drop-in event was held on Saturday 16 September between 11:00 am and 4:00 pm at Barrow Village Hall.
- 2.12 During the event, a number of information boards were made available for local residents to view and members of the project team were available to answer questions.
- 2.13 A total of 58 individuals attended the event.

3. Consultation Feedback

- 3.1 Feedback has been received via the project website, hardcopy feedback forms and during the consultation events. Original copies of this feedback can be found at Appendices 3, 4 and 5 accompanying this report.
- 3.2 All the feedback has been reviewed and analysed by the project team.
- 3.3 A total of 197 forms of feedback have been received as illustrated in Table 3.1 below. However, we have omitted some responses from this report’s analysis in two scenarios – where an individual or organisation has submitted more than one response, and where an outside body has submitted a response. A breakdown of responses can be found below.

Feedback Method	Total number
Online form	97
Hardcopy form	30
Email/Letters	70
Overall Total	197
Excluding individuals/organisations who submitted more than one response	182
Excluding responses from outside bodies + above	176

Table 3.1 - Summary of total responses received via each feedback method

- 3.4 Of the 197, there were seven individuals or organisations who submitted more than one response. We have only included one response for each individual or organisation in this report’s analysis.
- 3.5 Additionally, we received six responses from several outside bodies which have been omitted from this report’s analysis.
- 3.6 All qualitative forms of feedback can be viewed in full Appendix 1, including those omitted from this report’s analysis.

Feedback analysis

Question 1: Having read the draft and associated documents, do you agree with the vision set out for Barrow-cum-Denham in the draft Neighbourhood Plan?

- 3.7 Respondents were presented with a Likert scale with options ranging from strongly agree to strongly disagree.
- 3.8 A total of 124 responses have been recorded to this question, submitted via the online or hardcopy feedback form.

3.9 In addition, we analysed 52 pieces of email and letter correspondence from residents and have categorised their sentiment. This does not include representations from outside bodies and individuals or organisations who submitted more than one response.

3.10 The results are illustrated in Figure 3.1 below.

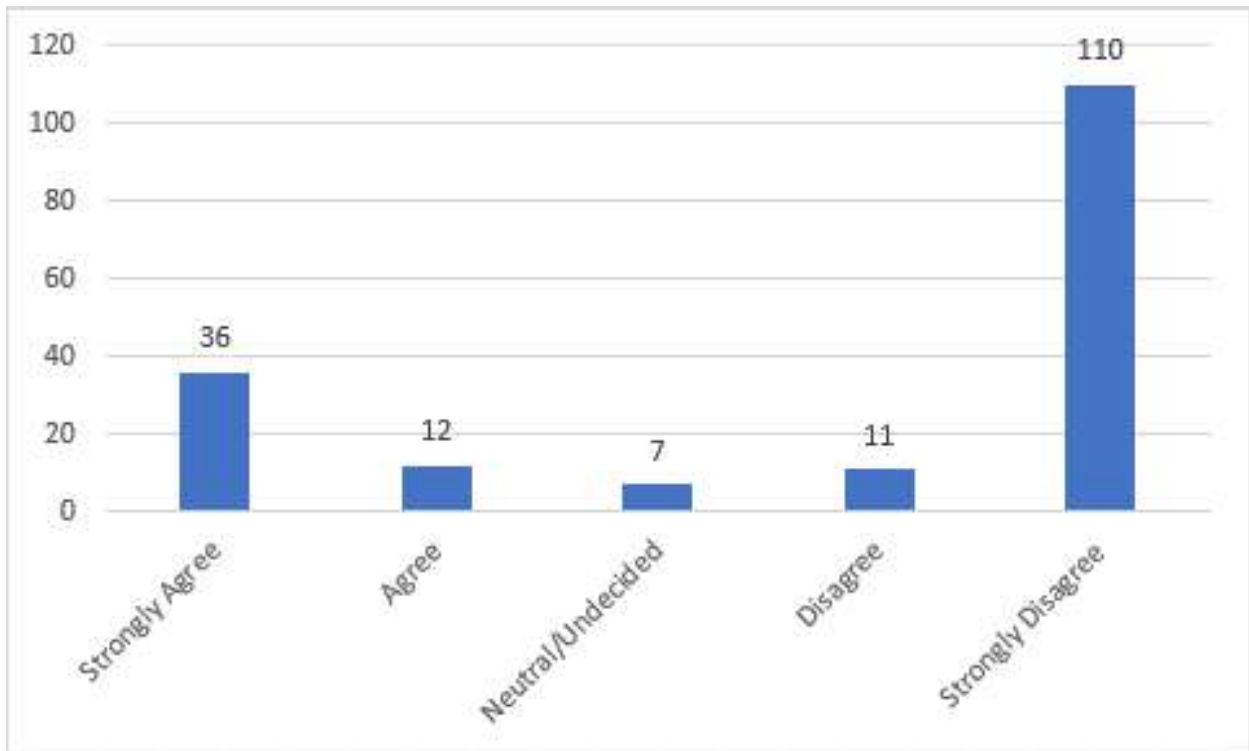


Figure 3.1 – Responses to Question 1

Question 2: Having read the draft Barrow-cum-Denham Neighbourhood Plan and associated documents, do you have any comments, feedback or questions to raise with us?

3.11 The responses received to question 2 via all feedback methods have been outlined by theme in Table 3.1 below.

3.12 Themes are organised alphabetically and not in order of importance.


3.13 A total of 161 responses were recorded to this question. This excludes responses submitted by outside bodies and individuals or organisations who submitted more than one response.

3.14 A number of consultees participated in the submission of identical responses (32 in total).

3.15 A full breakdown of responses can be viewed in **Appendix 3** including identical responses.

Table 3.1 – Summary of feedback

Theme	Summary of feedback
Affordability	It was felt that the rising property prices in the local area required new local housing to be affordable.
Allotments	<p>It was felt that additional allotments were not required.</p> <p>Respondents suggested a community garden could be delivered as an alternative use to allotments.</p>
Antisocial behaviour	One respondent believed that additional development would lead to an increase in antisocial behaviour.
Care Home	<p>It was suggested that the distance between the proposed care home and current shops could be an issue.</p> <p>Clarity was sought regarding the provision of Care Home facilities and where the care home would be located.</p>
Commercial	<p>The need for the provision of commercial premises was questioned.</p> <p>It was felt that Barrow has enough business premises presently.</p>
Conflict of interest	<p>It was suggested that there is a conflict of interest with one of the Barrow Hill landowners, who is also a member of the parish council, as they were privy to information that was available only to the parish council during the site selection process and not other landowners.</p> <p>It was felt that there was a conflict of interest in appointing Turley, who represents one of the landowners for the Barrow Hill site.</p>
Construction	It was stated that construction would have a detrimental impact on existing residents.
Consultation	It was suggested that the consultation was poorly publicised.
Design	Some felt it was important that any new homes were designed to reflect the uniqueness and character of the village.
Environment	It was felt that the new developments would damage the village's biodiversity and that ecological matters had not been fully considered.

Theme	Summary of feedback
	<p>It was felt that some improvements to the town's infrastructure could provide improvements for local wildlife.</p>
Flooding	<p>It was stated that flooding issues would need to be addressed, with the current drainage being inadequate.</p>
Housing density and mix	<p>The proposed number of homes was queried, as was whether developers could be prevented from building more than 170 homes. It was felt that the proposed site was too large.</p> <p>It was questioned whether it could be stipulated that retirement living be delivered prior to other housing.</p> <p>Respondents felt that provision for elderly members of the community should be prioritised.</p>
Infrastructure	<p>It was questioned whether existing infrastructure, including the road network, schools, and health services, would have the capacity to cope with additional demand from further housing.</p> <p>It was suggested that financial contributions should benefit the whole village and not be limited to health amenities and education.</p>
Landscaping	<p>Further landscaping around the edge of the proposed site, such as tree planting, was requested to increase biodiversity and prevent coalescence.</p>
Location	<p>The proposed location for further development was questioned.</p> <p>It was suggested by several respondents that further development should be centred around the school or Bury Road.</p> <p>Respondents highlighted that the proposed site disregards responses received to the 2021 Neighbourhood Plan Consultation questionnaire which concluded that most residents would prefer to see future development located in the north west of the village.</p> <p>Several respondents highlighted that the report produced by AECOM concluded that the Denham Lane and Bury Road sites were more sustainable than the parish council's preferred site.</p>
	<p>Bury Road </p>

Theme	Summary of feedback
	<p>Respondents believed the proposed Bury Road development would create a division between new and existing residents.</p> <p>Barrow Hill</p> <p>It was questioned why Barrow Hill was the preferred option for development when the Strategic Environmental Assessment concluded other options were of higher ranking.</p> <p>One respondent suggested that there was a preference for development east of Barrow Hill as identified in the draft allocation of the Local Plan.</p>
Need for new homes	The need for new homes was acknowledged.
Noise	Some felt the increase in traffic and construction could create more noise in the village.
Pollution	Some felt the increase in traffic could generate more pollution in the village.
Public footpath	<p>It was highlighted that there are limited pedestrian footpaths linking the proposed site to the village centre.</p> <p>One respondent suggested that the verges adjoining footpaths could become overburdened by further development.</p> <p>It was suggested that existing footpaths were inadequate, and a circular walk should be created.</p>
Public realm	It was felt that improvements to the public realm were required, and to meet the needs of all demographics.
Public transport	<p>It was suggested that public transport provision should be improved prior to further development taking place.</p> <p>It was felt that sites closer to the main road network or those better served by public transport should be prioritised.</p>
Highways	<p>It was highlighted that further development off Barrow Hill will increase traffic.</p> <p>Respondents believed that the proposed extension would elongate the village and distance new homes away from centralised village amenities, thereby increasing car use.</p>

Theme	Summary of feedback
	<p>Existing traffic pinch points, such as outside Matt's stores, were highlighted.</p> <p>Respondents stated that development should be focused on the A14 side of the village, where residents could access the road network and keep traffic out of the village centre.</p>
Neighbourhood Plan document	<p>It was felt that the Neighbourhood Plan was subjective and uninformative.</p> <p>Some respondents felt that the content was complex and biased.</p>
Parking	<p>It was suggested that new homes would require a minimum of two parking spaces.</p>
Road safety	<p>Concerns were expressed regarding the safety of young children and wildlife in relation to an increase in traffic.</p>
Size	<p>It was felt that the village was losing its character through housing growth, and that the transformation away from a village would damage social cohesion and harmony.</p>
Sporting facilities	<p>Respondents suggested that the requirement for additional sport and recreational provision is misguided and unnecessary.</p>
Support	<p>There was support for the Neighbourhood Plan as the best way to help protect infrastructure and prevent unsustainable development.</p>
Visual impact	<p>Respondents felt that development on Barrow Hill would have a detrimental impact on views of the surrounding countryside.</p>
Wildlife	<p>Respondents felt that further development would be detrimental to existing habitats.</p>

How the Neighbourhood Plan has responded to the Consultation

- 3.16 The Parish Council has considered the responses received and where possible has incorporated relevant comments into the Neighbourhood Plan, provided that they are in conformity with the prevailing Development Plan and National Policies (see Section 2 of the Neighbourhood Plan).
- 3.17 We have noted a number of objections to the site selection made by the Parish stating that development should be on an alternative site to the North of the village, but which does not currently factor in any emerging Plans. However this site location was deferred and sieved from consideration by West Suffolk Council at an early stage, on technical grounds, and so was not considered further by the Parish Council as part of its emerging Neighbourhood Plan.
- 3.18 Comments were received stating that there should be no further development in the village.
- 3.19 However, as a designated Key Service Centre, this is not a viable option over the longer term for the viability of the village and so has not influenced our Plan. We have however emphasised the need to restrict development to 165 dwellings, during the Plan period, being the sum total of our selected site allocation.
- 3.20 We have considered the comments relating to a variety of issues which are relevant to our preferred Site as well as the Site proposed by West Suffolk. For example: flooding, parking, traffic through the village and wider environmental impact. The latter is dealt with specifically in the updated Habitats Regulation Assessment (HRA - July 2024) for the growth proposed in the Neighbourhood Plan.
- 3.21 There were comments received suggesting that the Sports facilities and additional allotments were not required, so these elements have been removed from the Neighbourhood Plan. Other comments included the need for additional landscaping around the perimeter of the Site and improved public transport links, which have been incorporated into the submission version of the Neighbourhood Plan.
- 3.22 Whilst all responses have been duly considered, a number of the public responses were either contrary to other responses received or ran counter to the main principles and objectives of the Plan.
- 3.23 Following the Regulation 14 consultation, a significant number of amendments were however made to the Draft pre-submission Neighbourhood Plan. These included further clarifications in the explanatory text and amendments / additions to the wording of the policies.
- 3.24 A detailed schedule of these changes and the stated reasons why these changes were made following the Regulation 14 consultation can be found overleaf.

Barrow cum Denham Neighbourhood Plan: Regulation 16 Submission - Schedule of Main Modifications

Page and Paragraph Ref	Change made from Regulation 14 Draft	Reason
Front Cover	Text change to 'Regulation 16 Submission Draft'	Updated R16 Submission Stage document
Front Cover	New Main image	Updated R16 Submission Stage document
Page 3 – First Paragraph	Text change to 'Regulation 16 Submission Draft'	Updated R16 Submission Stage document
Page 3 – Fourth Paragraph	Replacement updated 4 th Paragraph	Need to refer to Reg 14 in past tense
Page 6 – Policy BCD5	Change title to ' <i>New Development and High Quality Design</i> '	Responds to consultation comments: Design standards should apply to all forms of development.
Page 9 – First Blue Paragraph	Text change to 'Regulation 16 Submission Draft'	Updated R16 Submission Stage document
Page 11 – New Paragraph 1.4	<i>'The Regulation 14 Public Consultation was undertaken in September and October of 2023'.</i>	General updating
Page 12 - Paragraph 1.4 on	Paragraphs renumbered from insertion above.	Original R14 version numbering out of sequence on p12
Page 16 – Paragraph 2.10	Replacement Paragraph 2.10	Changes made in response to comments made by Parish Council and SCC as Minerals Authority.
Page 23 – First Blue Paragraph	Hamlet of Denham changed to ' <i>separate village and parish</i> '	Responds to consultation comments, re status of Denham.
Page 23 – New Paragraph 3.1	Additional new Paragraph 3.1 inserted re Denham	Responds to consultation comments, re status of Denham.
Page 23 – Paragraph 3.3	Additional text added to start of Paragraph 3.3: <i>'There are also two Roadside Nature Reserves (RNR's) in the village of Denham'.</i>	Responds to consultation comments, re character of Denham

Page 23 – Paragraph 3.4	Additional text added at end of Paragraph 3.4: <i>‘There are two Scheduled Ancient Monuments in Denham: Denham Hall is a Grade II Manor Farmhouse (C16-C17) complete with encircling medieval moat and Denham Castle, which was a C12 Normal Castle, built to a Motte and Bailey design.’</i>	Responds to consultation comments, re character of Denham
Page 26 - Facilities Map	Updates to Infographic	Made in response to comments from Parish Council
Page 28 – Paragraph 3.15	Compass changed to <i>‘Companies House’</i>	Noted from consultation comments
Page 32 – Paragraph 3.32	Replacement Paragraph – references to Barrow cum Denham changed to <i>‘Barrow (including Burthorpe) and the ‘Parishes of Barrow and Denham’.</i>	Made in response to comments from Parish Council
Page 35 – Paragraph 3.58	New Paragraph inserted to follow and read: <i>‘Denham Castle was a C12 Norman castle, built to a Motte and Bailey design with the Motte (man-made hill) now 3 metres high, located in the north-east corner of the Site. The Motte and Bailey (courtyard) are contained within a wide ditch, approximately 132 metres by 122 metres’.</i>	Made in response to comments from Parish Council
Page 36 – Paragraph 3.60	Paragraph edited to clarify that Green Belt is not a landscape designation.	Made in response to comments from West Suffolk Council
Page 39 – Paragraph 3.68	Replacement Paragraph – references to Barrow cum Denham changed to <i>‘the Parishes of Barrow and Denham’.</i>	Made in response to comments from the Parish Council
Page 39 – Paragraph 3.70	As above	As above

Page 39 – Paragraph 3.71	Paragraph rewritten to add within: <i>‘Whilst the majority of adult respondents were content that sufficient facilities were available, the quarter of the population that disagreed, indicates that there are identified sports and recreational deficiencies in the Neighbourhood Plan Area.’</i>	Clarified in response to comments from the Parish Council
Page 40 – Paragraph 3.73	Additional sentence added: <i>‘The population of Denham is around 170 persons’.</i>	Made in response to comments from the Parish Council
Page 40 – Paragraph 3.75	Replacement Paragraph – references to Barrow cum Denham changed to <i>‘the Parishes of Barrow and Denham’</i>	Made in response to comments from the Parish Council
Page 43	Edited Paragraphs (all) – references to Barrow cum Denham changed to <i>‘the Parishes of Barrow and Denham’</i>	Made in response to comments from the Parish Council
Page 45	Edited Text Boxes (all) – references to Barrow cum Denham changed to <i>‘the Parishes of Barrow and Denham’</i>	Made in response to comments from the Parish Council
Page 46 – Paragraph 4.9	‘Site’ changed to ‘Allocation Site’ and additional sentence added re composition: <i>‘The selected Allocation Site comprises an amalgam of separate land parcels located east and west of Barrow Hill, as indicated at Figure 4 of this Neighbourhood Plan.’</i>	Made in response to comments from the Parish Council

Page 46 – Paragraph 4.10	Paragraph edited to better explain the spatial strategy of the Neighbourhood Plan.	Made in response to comments from the Parish Council
Page 46 – Paragraph 4.11	Additional sentence added: <i>‘Also that the village of Denham as a whole is protected from large-scale development’.</i>	Made in response to comments from the Parish Council
Page 49 – The Spatial Strategy	Older BD Policy references corrected to correct BCD references throughout.	Noted from consultation comments
Page 51 – First Blue Paragraph	Text changed to: <i>‘for employment, around 165 additional new homes, other ancillary uses and green infrastructure to the west and east t of Barrow Hill, as set out in Neighbourhood Plan Policy, BCD2’.</i>	Made at the request of the Parish Council
Page 51 – BCD2.3	Updated text and additional last sentence added to read: <i>‘In addition, the development of the Allocation Site will also need to ensure that the existing residential amenities of neighbouring residents in Beale Road, Macdonald Way, Dale Tree Road and Lion Green are suitably protected, though the use of sensitive design and the careful location of new buildings. In addition, the Parish Council will seek input and consultation in the approval of the submitted Construction and Environmental Management Plan (CEMP) as part of any future development proposals for the Site’.</i>	Made in response to public consultation event comments

Page 51 – BCD 2.4	Paragraph edited to change ‘assisted living’ to: <i>and/or other forms of specialist accommodation</i>	Made in response to public consultation comments
Page 51 – BCD 2.6	Paragraph edited to: <i>‘Other requirements of the Allocation Site include employment provision, which would comprise a mix of uses, including a Care Home and other business space, to provide sustainable working opportunities within the Neighbourhood Plan Area’.</i>	Made in response to public consultation comments
Page 51 – BCD 2.7	First sentence changed to: <i>‘The Parish Council will ensure the delivery of future sustainable employment opportunities on the Allocation Site’.</i>	Made in response to Parish Council comments
Page 53 – BCD 2.8	Sentence added: <i>‘The provision of a circular walk providing access to the PROW network outside of the village will also be encouraged’.</i>	Made in response to Parish Council and public comments
Page 53 – BCD 2.9	Text added: <i>‘such as allotments and/or a community orchard’</i> Text added: <i>‘Development proposals will be required to submit schemes appropriate to their scale, detailing how on-site surface water drainage and water resources will be managed’.</i>	Made in response to Parish Council and public comments Made in response to Local Lead Flood Authority Comments

Page 53 – BCD 2.9	<p><i>Text added:</i></p> <p><i>‘All planning applications should be supported by the results of a programme of archaeological evaluation with proposals for managing any impacts’.</i></p>	Made in response to SCC comments
Page 53 – BCD2 Policy Box	<p>Criterion i changed to <i>‘A maximum of 165 new homes’</i></p> <p>Criterion iv changed to include caveat re employment land <i>‘Where such uses do not come forward, the land will not be available for any additional future residential use’.</i></p> <p>Criterion vi – footpath linkages changed to <i>‘public rights of way’</i></p> <p>Additional new Criterion xi to read:</p> <p><i>‘Contributions to the Parish Council for improved community facilities serving the Parishes of Barrow and Denham’.</i></p>	<p>Made at the request of the Parish Council</p> <p>Made at the request of the Parish Council</p> <p>Made at the request of SCC as Highways Authority</p> <p>Made at the request of the Parish Council</p>
Page 55 – BCD3.1	<p>170 new homes reduced to <i>165 new homes</i></p> <p>Windfall allowance to be - <i>‘in conformity with the adopted Development Plan’.</i></p>	Made at the request of the Parish Council and comments by West Suffolk Council

Page 55 – BCD3.2	Text added: <i>‘including the redevelopment of existing brownfield sites’</i>	Made in response to comments by West Suffolk Council
Page 56 – BCD3 Policy Box	After criterion vi new text added : <i>‘Where in conformity with the adopted Development Plan, proposals.....’</i>	Made in response to consultation comments
Page 62/63	Title change - <i>‘New development and High Quality Design’</i>	In response to public consultation comments (see above)
Page 63 – BCD5 Policy Box	Second paragraph to include additional text: <i>‘The layout of new housing should not be road or parking dominated and should reflect the settlement pattern of the area, with high levels of pedestrian permeability in accordance with the Suffolk Guidance for Parking 2023 and the Suffolk Design for Streets Guide 2022 (or any successor documents)’.</i>	Made at the request of SCC as Highways Authority
Page 65 – BCD6 Policy Box	New Criterion vi added: <i>‘All new buildings should include integral Nest Boxes to British Standard BS42021:2022 ‘Integral Nest Boxes, Selection and Installation for New Developments.’</i>	Made at the request of the Parish Council
Page 69 – BCD7 Policy Box	Criterion vi replaced by new paragraph which considers all forms of other employment use if main use envisaged does not come forward but excludes residential use.	Made at the request of the Parish Council

Page 79 – BCD10 Policy Box	Criterion iii amended to 10 units or more before contributing to local wildlife improvements or habitats, adding: <i>‘where any adverse impacts arising from the proposals have been identified’</i>	Made in response to comments received from the Parish Council and the public consultation.
Page 81 – BCD11.1	Text added: <i>‘Wolfe Hall, Denham St Mary’s Church, Denham Hall and Denham Castle’;</i>	Made at the request of the Parish Council
Page 81 – BCD11.2	Minor edits to paragraph	Edits to reflect heritage language used in the NPPF
Page 82 – BCD11 Policy Box	Additional text added to last paragraph: <i>‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use, in accordance with Paragraph 208 of the NPPF.’</i>	Made in response to public consultation comments and to bring policy into conformity with the NPPF which enables a public benefits test, against low levels of harm.
Page 86 – BCD12 Policy Box	Additional sentence at end of first paragraph: <i>‘The Parish Council will secure community funding for the delivery of walking, cycling and other non-car modes, including public transport, through contributions to improved facilities serving the Parishes of Barrow and Denham’.</i>	Made at the request of the Parish Council
Page 96 – Denham Hall Moat	Additional explanatory text	Made in response to comments from Parish Council and the public consultation.

4. Conclusion

- 4.1 The engagement undertaken has enabled the project team to build an understanding of the local context and gather feedback on the draft plan to inform the scope of the next stage of the Neighbourhood Plan.
- 4.2 The community has been engaged through a range of methods and techniques including distribution of a leaflet, hosting a project website, and holding a drop-in event.
- 4.3 All of the feedback received as part of the consultation has been considered and will help inform the scope of the next stage of the plan.
- 4.4 A total of 197 forms of feedback have been received including 97 online feedback forms, 30 hard copy forms and 70 emails/letters.
- 4.5 A full breakdown of qualitative responses can be viewed in **Appendices 3, 4 and 5** including identical responses, individuals and organisations who submitted more than one response, and outside body responses.

Appendix 1: Leaflet

Have Your Say

Your views are important to us and we invite you to have your say on the draft Barrow-Cum-Denham Neighbourhood Plan. Please use this form to provide your feedback if you are not able to submit feedback on the website nor attend the community planning day on Saturday, 16 September, and are instead viewing hard copy materials.

Q1: Having read the draft and associated documents, do you agree with the vision set out for Barrow-cum-Denham in the draft Neighbourhood Plan?

Strongly Agree Agree Undecided Disagree Strongly Disagree

.....

Q1: Having read the draft Barrow-cum-Denham Neighbourhood Plan and associated documents, do you have any comments, feedback or questions to raise with us?

Comment Box

Optional: If you would like your comments to be attributable to you, please leave your name below.

Name:

NEWSLINK

Keeping you in touch with
Barrow-cum-Denham Parish Council

Special Edition: Public consultation on the Barrow-cum-Denham Neighbourhood Plan

Dear Resident of Barrow/Denham,

As you may be aware, Barrow-cum-Denham Parish Council has been preparing its draft Neighbourhood Plan for formal submission to West Suffolk District Council later this year. We are writing to you to give you advance notice of our consultation period which will commence on Tuesday 12 September 2023.

Barrow-cum-Denham has a strong sense of its own local identity and community values, and through the production of a Neighbourhood Plan, seeks to set out a clear pathway into the future to strengthen and secure the long-term integrity of the Neighbourhood Plan Area. The Neighbourhood Plan Area covers the settlements of Barrow, Burthorpe and Denham, and the rural hinterland around these settlements.

Consultation dates
Tuesday 12 September to Tuesday 24 October 2023

www.barrowsuffolkNP.co.uk

What is a Neighbourhood Plan?

Neighbourhood planning was introduced in the Localism Act 2011. It is an important and powerful tool that gives communities statutory powers to shape how their communities develop.

In very simple terms, a neighbourhood plan is:

- A document that sets out planning policies for the neighbourhood area - planning policies are used to decide whether to approve planning applications
- Written by the local community, the people who know and love the area, rather than the local planning authority

How can I view the Neighbourhood Plan and have my say?

Online: When the consultation launches on Tuesday 12 September, a website will go live, containing information on the draft plan and a digital feedback form. You can access this website by scanning the QR code on the next page, or typing in www.barrowsuffolkNP.co.uk. **Please note that you will not be able to access the website until 12 September when this consultation launches, so keep this leaflet handy until then.**

In Person: We will also be hosting a community planning day on **Saturday, 16 September at the Village Hall from 11am to 4pm**. All residents are invited to attend, and feedback forms will be provided.

If you are not able to access the website nor attend the community planning day, draft plan documents will be available to be view at the Post Office at Matts Store. A hard copy can be requested for viewing by arrangement - please contact Cllr Ralph Rawlings (details across the page). You can then use the feedback area on the back of this leaflet to provide your comments, cut and drop off at the Post Office.

www.barrowsuffolkNP.co.uk

COUNCILLORS FOR BARROW

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PRIEST IN CHARGE OF THE BARROW BENEFICE

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PARISH CLERK

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Turley Strategic Communications
on behalf of Barrow-cum-Denham
Parish Council

www.barrowsuffolkNP.co.uk



Appendix 2: Website

Welcome to the Barrow-cum-Denham Neighbourhood Plan page

This website provides you with further information about the Neighbourhood Plan and invites you to be involved in shaping the future of your local area.

You can find out further information by:



Joining our community planning day on **Saturday 16 September** at Barrow Village Hall. Drop in any time between **11am and 4pm** where members of the team will be available to answer any questions and you can provide your feedback on the day.



Viewing the Exhibition Boards displayed at the community planning day

[Click here to download](#)



Downloading a copy of the Neighbourhood Plan

[Click here to download](#)



Downloading a copy of the Environmental Report

[Click here to download](#)



What is a Neighbourhood Plan?

Neighbourhood planning was introduced in the Localism Act 2011. It is an important and powerful tool that gives communities statutory powers to shape how their communities develop.

In very simple terms, a neighbourhood plan is:

- A document that sets out planning policies for the neighbourhood area - planning policies are used to decide whether to approve planning applications
- Written by the local community, the people who know and love the area, rather than the local planning authority

About the Neighbourhood Plan

The Barrow-cum-Denham Neighbourhood Plan area covers the settlements of Barrow, Burthorpe and Denham and the rural hinterland around these settlements.

This Plan has been prepared by Barrow-cum-Denham Parish Council, for the community to help protect the local identity of the area and community values. The Plan sets out a clear pathway into the future to strengthen and secure the long-term integrity of the Neighbourhood Plan Area.



Find out more and provide your feedback

We are keen to hear your feedback the draft plan before we submit it to West Suffolk District Council.

You can find out more and have your say by:



Joining our community planning day on **Saturday 16 September** at Barrow Village Hall. Drop in any time between **11am and 4pm** where members of the team will be available to answer any questions and you can provide your feedback on the day.



Downloading a copy of the Neighbourhood Plan and completing the feedback form.

[Click here to download](#)



Viewing a **hardcopy of the Neighbourhood Plan** at the Post Office at Matts Store

We encourage you to spread the word and help as many members of the community as possible to help share the future of the local community.

A hard copy of the Neighbourhood Plan can be requested for viewing by arrangement - please contact Cllr Ralph Rawlings ralph.rawlings@barrowcumdenhampc.com

Please ensure that all feedback reaches us by Tuesday 24 October 2023.

We would be grateful if you could provide any comments you have in the box below.

Q1. Having read the draft and associated documents, do you agree with the vision set out for Barrow-cum-Denham in the draft Neighbourhood Plan?

Strongly Disagree Disagree Neutral Agree Strongly Agree

Q2. Having read the draft Barrow-cum-Denham Neighbourhood Plan and associated documents, do you have any comments, feedback or questions to raise with us?

Name

First Name

Last Name

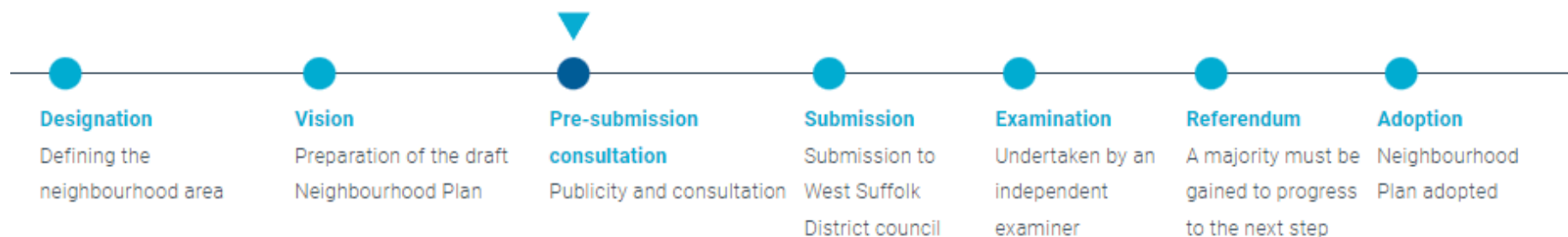
Email

[Send](#)

The information you provide will be used only for the purposes of keeping you informed about this project and for understanding public opinion on the project. It will be stored securely until completion of the project, after which this information will be deleted. Your information will only be shared with third parties for the express purpose of keeping you informed of the proposals, and with Barrow cum Denham Parish Council and/or the relevant local authority where there is a legal obligation to do so. It will not be forwarded on to any other third parties. You can contact us at any time to request the deletion of your information.

What happens next?

The Process



Following the consultation deadline, we will collate all feedback received. Once we have finalised the Neighbourhood Plan we will submit it to West Suffolk District Council who will undertake their own consultation on the application.

Appendix 3: Feedback Comments - Letters and Emails

Due to the size of the files containing the letters and emails received by the Parish Council, these have not been able to be merged into this document – however they have been uploaded to the Barrow Neighbourhood Plan website (www.barrowsuffolknp.co.uk) and are labelled Appendix 3 (Parts 1-6).

Appendix 4: Feedback Comments – online forms

All qualitative responses received via the online feedback form, hardcopy feedback form, email and letter have been included verbatim for transparency below. Consultee names and contact details have been removed for privacy purposes.

Responses from external organisations, individuals who submitted more than one response, and identical responses are all included.

It should be noted that of the 97 online feedback forms received, 82 respondents provided responses to the qualitative questions.

Online feedback forms 82

66

The location of the proposed developments continues to 'stretch the village, resulting in more car journeys throughout. Clearly there is a need for more homes, but the locations proposed don't add character nor value, purely extend an area on the opposite side of the village from the most likely commutable routes (A14 and bury st edmunds). Furthermore, the infrastructure and road network are already in a poor state, with roads failing, flooding frequently and power cuts being experienced. A village needs a centre and by elongation the village it becomes a commuting highway, not somewhere people can walk. Not to mention the increase in vehicle travels.

67

There is no traffic flow analysis - this plan will force traffic from all proposed employment and residential areas to drive through the centre of the village, increase noise, pollution and increasing risk of accidents to the wildlife and people of Barrow. School amenities are at the opposite end of the village, again likely to increase traffic and risks to children travelling to and from school. The development on Barrow Hill would have negative impact on distinctive views of surrounding countryside from the recently enhanced public footpaths used for recreation to the north of Barrow Hill looking across open country side to ancient woodland Wilsummer Wood https://heritage.suffolk.gov.uk/Monument/MSF15588_c1597

68

This makes some sense to ensure the village doesn't become overly large , However there are still issues that need to be addressed such as the road flooding and overburdened verges adjoining some footpaths plus the upkeep of the current roads due to increased expected traffic volume

69

My objections/comments to the draft Neighbourhood Plan and its preference for the development of land at Barrow Hill are as follows:

1. You have not detailed why you have opted for the Barrow Hill development when compared to the other options detailed in your own Strategic Environmental Assessment for Barrow cum Denham Neighbourhood Plan, a plan that concludes that other options are of higher ranking than the Barrow Hill option. This suggests that you are in favour of the old and established parts of the village remaining separate and remote from the new development locations.
2. The proposed Barrow Rd development will add to the risk of creating a division between old and new within the village. Grouping the majority of new building to one side of the village could create a them and us situation (old and established village occupants v 'newbys')
3. I consider it unfair that families, having moved to the existing new developments along Barrow Rd, for a 'country side' experience, will again have to suffer living amongst a construction site and have their view of countryside, which they rightly could have assumed would be available to them for the foreseeable future, taken away from them.
4. The proposed development will extend the village envelope, elongating the village and distancing new housing from the centralised village amenities and the school to the North of the village. This will result in increased use of personal vehicles by property owners to access amenities and the school, especially in wet weather, when walking is not an option due to inadequate footpaths and extremely poorly drained roads (significant splash risk from passing vehicles)
5. During construction of the Barrow Hill development there will be a significant increase in vehicular activity along the entire length of the village main road (Colethorpe Rd, The Street, The Green and Barrow Hill) as vehicles access the site from the A14. As previously mentioned, pedestrians are at risk from this increased activity, which the adoption of alternative development options, would reduce.
6. I assume that one of your arguments for not adopting a Bury Road option is that it would result in coalescence with Burthorpe. I do not agree. Burthorpe is essentially Barrow, there is already housing running eastwards on the north side of Bury Road.
7. My location preference for further development in Barrow would be around the School, my second preference would be the West Suffolk Council proposal for Bury Road.

70

Build Barrow Hill not Bury Road. It's pretty simple. Barrow can't cope with Bury Road building. It will mean greater traffic and won't cope. Barrow Hill, different routes available. Not rocket science.

71

Since moving to Barrow (Barrow Hill) some nine years ago, we have noticed a significant increase in traffic and noise. The road itself is rapidly falling apart, and the drainage on the road is completely inadequate - probably due to the drains collapsing due to the heavy traffic. There is also

a significant traffic hotspot outside Matt's Stores, which is getting worse as Barrow Hill is developed. Surely anyone with any sense should see that future development for Barrow would be better focussed on the A14 side of the village, so the residents of the new development would be close to the road that most of them would use to commute to work? This would keep the traffic away from the centre of the village. If more development of Barrow Hill has to happen (its probably already a done deal) then we really do need to improve the road (Barrow Hill), and add significant traffic calming measures. Trying to stipulate things about car parking for the new development wont work - people want cars, and in reality any new house needs at least two designated parking spaces - four for bigger houses. Even if we had a railway station in Barrow people will still want cars.

72

Why has the site size grown from those provided when sites were put forward?

What stops the developers from building more than 170 houses?

Is the potential retirement facility numbers in addition to housing numbers or does that help reduce housing numbers?

Can there be a stipulation that housing can not be developed unless the retirement facility is actually being built?

Why is more land needed for business commercial, when land has been allocated for this for many years but has not been developed?

Why are you showing allotments? There are already two allotments in the village! This land area will just be used for more housing.

Can the neighbourhood plan ask for more planting around the edge of the site such as more trees and hedgerows to increase biodiversity and discourage further land creep in years to come?

I accept that the village has to have further housing development. I still do not understand why the site adjacent the school could not be taken forward as an option alongside a smaller site elsewhere in the village. It may not be adjacent the settlement boundary but logistically makes an awful lot more sense and this could have been argued. I feel consultants took the easy option when advising the parish council!

This site is my next preferred site, however it does seem to have grown in area and I feel a developer will try and squeeze housing on to all of it including the commercial area ect and so the village will have more than 170 additional houses.

- school capacity, are you confident that the school will be able to accommodate the increase of children? It's already nearly at capacity and as a popular school in the area I have concerns my child will struggle to get a space when due to start school. I would like her to attend the village school. With 170 homes even if just 1/4 of the homes had school age kids our current school will not cope with that increase unless there are plans to increase capacity?

- value of my property, being near the proposed development I feel this will affect my houses value

- roads, with only one main road in and out of the village which is already a busy road where drivers speed with little care I have concerns the road network will get even busier and won't be able to cope with the increase in traffic. Most households have 2 cars so we are potentially looking at another 300+ cars driving through the village. To get from the south of the village out you will typically go through the village to the a14 - these roads aren't built for that level of traffic

The increase in traffic concerns me and makes me worried about the safety of my child walking up and down the main road as well as the poor ducks who are frequently getting injured or killed - an increase is going to just make this an even bigger issue. The ducks in Barrow are a real asset to the village and this will not be a positive for them.

- I appreciate building needs to happen but the proposed developments aren't going to be very in keeping with the style of the overall village. Big developments that cram houses in doesn't feel like Barrow to me and I think it'd be a real shame to the whole village to have such big housing developments. The more recent housing developments that have been completed in Barrow are much smaller in size and therefore fit with the village lifestyle much more than huge developments. Can you not find pockets of land for smaller developments that are spread through the village so it doesn't take away the sense of village? At this rate it will become a mini town which brings other issues including anti-social behaviour

- the above concerns focus on once the development has been completed, during the construction the issues with roads, traffic, wildlife all apply. In addition the environment whilst they are building will not be very enjoyable to live next to.

73

Before any more development is approved for Barrow, the flooding at Britton's Pond in The Street needs to be addressed as well as parking on The Street at Matt's Stores and Post Office and on Church Road/The Street for the primary school.

Instead of back filling and extending the village boundary on Barrow Hill, another more obvious option is to develop land south of Bury Road,

from Dale Tree Road to Burthorpe.

The development contributions should be for the whole village and not limited to health amenities and education.

74

The Neighbourhood Plan has to reinforce implementation of Services for Barrow as a Key Service Centre.

No more building of housing should go ahead until the provision of services (Health/Education/Recreation, etc has 'caught up' with the present housing stock, then increased as necessary when the next housing development is incorporated in the Barrow Development area.

I agree the Barrow Hill site should be proposed as the allocation for new housing, but many additional services will be required before and during any building - improved highway and pedestrian areas (drainage & lighting etc) and transport (eg bus provision into and out of Barrow) etc.

Some necessary consideration for parking around vital services, eg school, playing fields.

Increased presence of Health Services eg Doctors in attendance for more hours.

Provision for the elderly population should also be a huge consideration

75

Question 1

In 2019, the Parish Council put forward a plan to further develop land south of Barrow Hill. This provoked a furious reaction within the village, and led to a campaign 'STOP BARROW NEW TOWN'. This current proposal is to build even more houses south of the village, but without the new recreational facilities provided for in the 2019 plan. How much has it cost to arrive at the same conclusion (to develop south of Barrow Hill) that the Parish Council reached in 2019?

Question 2

Page 55 of the NP document which deals with 'Non Strategic Housing Delivery' makes reference to "policy BD4 of this plan". I cannot find details of this policy in the document, and it is not referenced in the index on page 6.

Question 3.

Why is the data on the socio economic profile (page 27) of the area based on 2019 figures. Since then we have seen the latest new development on Barrow Hill, together with significant changes to employment/unemployment as a consequence of the pandemic.

76

I believe the Barrow Hill development plan is unsuitable for many reasons and alternative sites are better suited to the neighbourhood plan.

77

There is a lack of pedestrian paths to the preferred site, with many getting soaked by passing traffic after rainfall, and actually having to stand in the road to pass one another. Which with increased traffic from the development will be dangerous. Traffic will have to travel from A14 all through the village on village roads which are not suitable for increased traffic. Cars leaving the village at the south end along Barrow Hill already exceed the speed limit way before clearing housing and make it difficult and dangerous exiting from Beale Road on to Barrow Hill where there is restricted view due to poorly maintained hedging. Increased traffic to new proposed development increases the risk of a serious accident along Barrow Hill.

78

First of all thank you for the time given on the 16th to answer queries.

1. I do think it is essential that purpose built flats for the elderly are included in any scheme, preferably in sufficient numbers to enable carers to be employed on the premises 24 hrs per day. If you have always lived in the country why would you want to move into a large town in your declining years?. Don't forget if you have 40 flats you need at least one parking space per flat, even the elderly have visitors! I suggest you look at Green Square Housing in particular at Milton under Wychwood as an excellent example of combined privately owned and rented accommodation in the countryside' for the over 60's.

2. Beale Rd is currently a cul-de- sac and should be kept that way in order to keep the traffic leaving this road to a minimum as visibility can be a problem. Also current residents would not want their road to be used as a rat run, (and it seems unreasonable for this to happen).

Provided the above two points are adhered to I would agree with the current plans, I may not like them but accept houses need to be built somewhere.

I do not wish my comments to be made public knowledge.

79

I believe any new development should be on Barrow Hill.

80

I have read the Neighbourhood Plan to the end and have some contributions of my own that I would like you to consider. My preferred options would be C or D.

Option E would be unsuitable because the land slopes towards Bury Road and we already experience flooding at Sharpes Hill corner during heavy rain. This threatens the bungalows at the bottom and, with rainfall likely to increase, could negatively impact on existing properties. I am also aware that houses at the Bury end of Bury Road have experienced sewage coming up into their homes as a result of the drains being unable to cope with the quantity of water.

Of major concern is the already unsuitable roads which allow access to the village. In adverse weather Coalpit Lane frequently floods, and has historically been blocked by snow. The country lane from Barrow to Westley lacks essential cycleways, it is used a lot by cyclists. Maybe that could have been addressed when the road was closed for the recent pipeline? The road from Sharpes Hill to Risby is another problem area, a nightmare when the A14 has emergency closures and lorries come through that single file lane!

Transport links for those in need of lifts are already addressed by the local Good Neighbours Scheme, established since 2006, supplying a door to door car service at a modest price. My husband continues to offer help since its inception.

The post office, now located centrally in the village store, is more accessible to all parts of the village.

The Parish Councillors, all of whom have the interests of the village at their heart, prefer the Barrow Hill option and I would respectfully suggest that their unique village knowledge would guide them to the best option.

It seems we are obliged to have more homes here, despite the fact that we are used as a commuter town for Cambridge, and there are few examples of the new residents contributing much to village life.

I came to work in Barrow in 1965 and have lived in the village since 1990. I welcomed the recent new housing because it is important to keep the village 'alive', however we must not allow the drive for more homes to swamp us, but can we honestly say any are truly 'affordable' in middle class W Suffolk'?

Thank you for taking the time to read my views.

81

This plan places the proposed development in the most logical place for the village and offers the right mix of housing needs. But I'm not sure how the West Suffolk Council can be persuaded to accept the views of the local Parish Council and residents

82

I do not understand why the plan is focused on the Barrow Hill site. I understand that this goes against what West Suffolk Council want and also what the villagers want when asked a few years ago.

If Barrow hill is the selected site, then something has to happen to the road size of Barrow Hill and also the pavement size. If you are walking into Barrow and a lorry or tractor goes past it is rather tight and you do fear something is going to mount the pavement and hit you.

Also it seems strange to build something as far away as it can be from the school, A14 and other facilities.

I also think it that having someone on the parish council who has declared interests in the land off Bury road could have been another reason

why this land has been selected.

But if it does go ahead, as i have said the road needs to be improved and widened for traffic and pedestrians.

83

Barrow has recently had several new housing estates built - there is no need for further housing. The village itself does not need to become a town.

Walking through the village at 6.00 am frequently it is shocking the number of cars, vans, lorries all speeding through. There is no respect shown for the residents nor the wildlife (ducks, cats) within the village by such drivers. The additional noise and pollution caused is unwanted.

Additional building for more houses would increase the volume of traffic, the number of people using the area, the noise pollution not to mention the demands for services within the village such as the school and medical facility.

Constructing further such facilities to accommodate a "town" housing Barrow residents is not the answer.

The current residents of Barrow do not want more people living around them, disrespecting the harmony of what a village should be.

Nobody does anything about the speeding vehicles through the village nor curb the volume of traffic from 6.00 am through til midnight every day.

Barrow needs to remain a village with historical properties, wildlife, countryside walking areas and the sense of a village community.

NO NEW BUILDING SITES IN OR AROUND BARROW.

84

The Neighbourhood Plan proposes that new housing development should take place to the south of Barrow off Barrow Hill yet in the reply to the questionnaire sent out prior to the Neighbourhood plan being prepared, 81.9% of the residents thought that this was the least appropriate place for any future development. 54.7% thought that the area between Colethorpe Lane and Church Road was the best area for more houses. The Neighbourhood Plan would have been the best opportunity to put forward the wishes of the residents but instead the Parish Council have chosen to put forward the 2nd least popular area as chosen by the residents.

The reason put forward by the Parish Council to discount the land between Colethorpe Lane and Church Lane does not hold up to scrutiny and should be retracted from the Neighbourhood Plan. Instead the Parish Council should include this area in the plan and use the opportunity to question why the County Council have totally ignored this area on the grounds that 'it is outside the settlement boundary' (a totally meaningless statement to my mind as everything is outside the settlement boundary until it is built) and yet the County Council seem quite prepared to consider land 'north of Mill Lane'.

85

Land between Colethorpe Lane and Church Road would surely meet all the requirements for sustainability that the Neighbourhood Plan purports to achieve whereas all the other sites fall short.

I think the Parish Council should seriously consider the wishes of the parishioners that they have chosen to represent.

86

Much is made of environmental/landscape/biodiversity impact and Wilsummer Wood is highlighted for its qualities as a County Wildlife Site and inclusion as a rare wooded chalk slope etc. The Strategic Environmental Assessment highlights Options B and E as the preferable solutions and then Option C is pretty much chosen! What? How? It increases car use, disrupts views across to an ancient woodland and is the one option that encroaches closer and closer to this ancient woodland/CWS/wooded chalk slope. If this is the preferred option, then it is obviously for the expedience of doing everything, all 170 properties in one site, at one time regardless of impact. This will also distend the village even further beyond Simpsons Way, disrupting the idea of the nucleic village and creating a functional strip along the main road. This proposal was rejected a few years ago, but as ever they/you/whoever will try try again until they get their way. Public consultation, local power, my arse (if you'll pardon the phrase.)

87

I feel strongly that the distinction between the different areas of the parish- Barrow, Denham End , Burthorpe and Denham are maintained.

88

Not happy about further large housing development but if the only way to stop West Suffolk Council forcing even larger housing developments onto Barrow then I see no alternative but to agree to the proposed 170 new homes being built outlined in your Plan. However we do not currently have the necessary road and general infrastructure to cope now, let alone with this further influx of people. Are the Council really going to take any notice of this Neighbourhood Plan anyway?

89

I think it would be good to have a piece of land adjacent to the recreation ground with trees, bushes, benches and paths for the elderly and young families to walk in with pushchairs, wheelchairs etc and picnic or just enjoy the peace and quiet away from the road, ball sports and dogs. The many footpaths are not appropriate for this group.

A cycle path to Bury St Edmunds would be well used as the road will get busier with the many new houses being built.

More busses to BSE including more through Denham are needed. Chevington has a bus every hour. This would cut the number of cars going into BSE.

90

The selected 13.6-hectare site is disproportionately extensive for fulfilling the housing demand of 170 residences in Barrow. This area has the capacity to accommodate more than 400 houses at a rate of 30 dwellings per hectare. Regrettably, the Parish Council has not adequately taken into account the preservation of green spaces and environmental concerns, in opposition to the viewpoints expressed by parishioners as outlined in the Parish Council's own report on the Parish Questionnaire.

The Parish Council's rejection of the location situated between Colethorpe Lane and Church Road was primarily due to the perceived lack of consideration for important material factors concerning an existing site allocation and the settlement boundary. The rationale behind the rejection centered on the site's lack of adjacency to the settlement boundary. This perspective, however, may be too limited in assessing the three crucial material considerations. Firstly, a portion of the site has already been designated for commercial and light industrial use under policy RV4 of the current Local Plan, potentially leading to a modification of the current settlement boundary within the Neighbourhood Plan's timeframe. Consequently, at least a portion of the site proposed in the Neighbourhood Plan could fall within a new settlement boundary. Secondly, this location holds substantial appeal, as evidenced by its designation as the most preferred area in the parish consultation due to its proximity to the A14. Thirdly, the site is either within or closely bordering the physical bounds of the existing settlement.

91

I object to the Parish Council's proposed Neighbourhood Plan for extra housing at Barrow Hill on the following grounds:

It will create an increase in traffic, around an extra 300 vehicle movements per day through the entire length of the village, whereas the Bury Road and Colethorpe Lane sites will not have the same impact. (Bury Road site - traffic heading to Bury St Edmunds will go through Saxham and traffic going to the A14 or Mildenhall will only go through half the village. Colethorpe Lane housing - would likely go directly to the A14 for the majority of journeys , completely avoiding the centre of the village.)

Barrow Hill is a country road and not wide enough to be used as a main road and it has one pavement on one side only which is very narrow resulting in vehicles being dangerously close to pedestrians.

The results of the Parish Council's own 2020 Neighbourhood Plan Questionnaire, shows that there was a village majority of 54.7% who voted for development in the part of Barrow by the school. In fact, 81.9% of respondees voted for sites other than Barrow Hill. The Parish Council's Neighbourhood Plan is therefore taking no notice of the wish of the Parishioners as indicated in the Parish Council's own 2020 Neighbourhood Plan Questionnaire.

The Colethorpe Lane site is closer to the A14 and will not bring traffic through the village. It provides homes nearer to the school enabling pedestrian access rather than driving through all the way through the village and the developers style of housing is much more in keeping with a village.

The proposed development is again to the south-east of the village, which has seen a disproportionate amount of new housing.

The proposed site at Barrow Hill is particularly visible at the southern entrance to the village all the way from Hargrave and is in fact highly visible from as far away as Chevington Lodge Farm, some 3 miles from the site.

There is a risk of Barrow Hill becoming one large urban area of new houses which will spoil the village and create a satellite area.

The proposed site is on a beautiful area of countryside which is enjoyed daily by so many village residents for walking and enjoying the open countryside. The proposed change of use will result in the permanent loss of these facilities.

The ducks help make Barrow special and this increase in traffic will have a devastating impact on our local wildfowl.

I understand that the draft proposal for development in the Neighbourhood Plan is expected to propose a further extension south of village development and also to the east on the very southern fringe of the village. Thinking about national objectives, I have grave concerns about this site in terms of meeting the national requirements. I believe there are other possible reasons for objecting to this proposal but here will concentrate only on Sustainability.

The national government has, I believe, entered willingly into a legal undertaking to make the UK a "Net Zero" location by 2050 or thereabouts. To do this it must depend on the delegated powers that Planning Authorities have and the Planning Inspectorate, to ensure that developments are located and designed to at least minimise the impact of development in relation to this need, to achieve a Net Zero future for the UK. The proposal as it appears for Barrow singularly fails to consider this need and hence to address it in defining an appropriate development scheme. Indeed, the proposal as I understand it on the southern and eastern fringe of the village would act directly contrary to the wishes of Central

Government to seek to maximise sustainability and minimise private transport needs.

If I might start for an ideal “blank page” development. A circular village of 1 mile radius would provide 3.14 square miles of development with all of it within 1 mile distance of the centre. However, if the development were linear and only half a mile wide then it would need to be over 6 miles long from end to end and much of the development would be between 1 and 3 miles from the centre. Clearly in this situation, the linear village is much less sustainable with many, longer intra-village journeys. This simply demonstrates the advantages in Sustainability terms of a round form of development.

The Council, it appears are not seeking such a form of growth of Barrow and instead look to extend southerly and just with a half mile or so of width to lengthen the linear nature of Barrow with many more vehicle journeys as a result of the greater distances to be travelled. Two examples of this impact of more or longer vehicle trips are:-

1. The distance from the school for almost all those resident in the new development would be comfortably more than a mile each way for trips to and from the school, a parent taking a child walking would with a young 7 or 8-year-old need 45 minutes or so to complete the return trip of taking a child and returning home. To do this twice a day to take and collect a child would take 1.5 hours and almost nobody would have that amount of spare time, so it would introduce many more vehicle trips each of over two miles (there and back) twice a day on all school days. This cannot be considered to be a sustainable solution.
2. Looking at the location in terms of trips to or from outside the village; most journeys come from or go to the A14 and this location is the most remote from that road, requiring all movements to or from the A14 to pass the whole length of the village, passing the school, village hall and shops. This is both an unsustainable solution and adds to the noise and reduces the quality of the local environment for those living on the main street or just using it to walk between their home and one of the village destinations.
3. There is no bus service at the southern end of the village and as the obvious route for bus services is, as at present, to link villages to either Bury or Newmarket, or both, giving village residents the option to visit either main centre, there is almost no chance of a usefully frequent bus service on Barrow Hill running north - south when the main towns are to east or west. Thus, further housing would generate even more traffic, acting against the needs of sustainability and increase traffic to and through the centre of the village.

P T O

Quite clearly either of the other options presented to the residents would have a lower sustainability impact. The northern one would avoid anyone having to use a car to take a child or children to school, it would minimise traffic increases through the village and shorten many journeys

and most certainly the majority, some entering or leaving via the A14 as it is some ¾ mile, or more, closer to the A14 than is any further development to the southern end either adjacent to Barrow Hill or to the east of Barrow Hill, but accessed via Barrow Hill.

The central option, as I believe is favoured by the District Council, would reduce vehicle movements by putting residents closer to the centre of the village, the shops, the village hall and/or village pubs, etc. Whilst it would put residents close to the present bus service route and might even offer the potential, with more passengers, for a more frequent service, thereby helping all in the village to consider more use of the bus services. This would also be helpful to the younger generation travelling to and from secondary education in Bury St Edmunds, as they would be located close to the bus service they require to and from schooling. This option also moves towards broadening the very narrow linear north - south arrangement of the village, making it marginally better and closer to a circular village development, thereby putting more residents close to the village centre and less inclined to require car transport for intra-village movements.

I believe there are strong nationally important reasons for objecting to the idea of lengthening the already long north – south axis of the village on the southern end, given it requires most movements to travel the whole length of the village with significant impacts in sustainability and in village ambience and local environmental terms. Whilst sending this to you I am also sending it to our District Council member and to the District Council as the Planning Authority, as I feel the District Council should carefully consider these points. Apart from anything else, the southern option does appear to me to be entirely contrary to Government policy and just make achieving “Net Zero” marginally more difficult as a nation.

Please can I ask that all those receiving this Email kindly acknowledge safe receipt to save me sending it again, and so I know all the parties included are aware of these reasonable sustainability concerns.

Sustainability is also not considered in this proposal. The school will need to be driven to, additional cars through the village, which is already too many, proposal is the wrong side of the village if you want the plan to be a sustainable proposal.

92

Whilst I would prefer no development, I appreciate that housing is required. I would like to see priority being given to the local residents for affordable housing, particularly for the young people. I support the idea for a Community Home.

93

We are in favour of the plan put forward by Barrow-cum-Denham and support the vision for the project to keep the villages as country villages with benefits for the villagers. To stay a country village and not a town suburb.

94

I don't understand why the heart of the village is being moved. Talk initially of moving the village hall, now it's staying but with the site being out of the village, people will just drive through and not become part of this community the site on Bury Road, at least it is easy walking distance for the post office, etc for the older generation.

95

Please consider including horse riders in multi user paths around any development. There is a large riding school in Barrow and a livery yard between Barrow and Saxham so many horse riders using the roads. New developments will make these roads busier so allowing horse riders to avoid stretches of road is a sensible safety measure for both riders and motorists.

96

Stretching the village further down Barrow Hill will weaken the community structure and further endanger pedestrians as the narrow pathway from the Hopkins homes to village green is already very dangerous with speeding cars.

97

I support the Neighbourhood Plan. However, anticipating new housing development and therefore a considerable increase in local population, I have concerns: the primary school is already at full capacity; early morning parking for the school and at home time causes significant traffic issues in The Street; the surgery has considerable waiting times for an appointment (and the car park is too small); there will be an increased volume of traffic in the village affecting the quality of the roads; will the flooding on Bury Road caused by heavy rain be addressed? Speeding is a major concern – more traffic calming initiatives, especially on Bury Road, would be most welcome. I would also hope that in the future, any potential 'infill' building of a few houses on a particular piece of land within the village will be actively discouraged.

Hopefully the NP will proceed, but whichever developer brings new homes into the village they always say that they will support the village with a financial benefit, be it for the school, local amenities or other, but how can they be held to this when by all accounts, previous financial benefits from previous development meant for the village has been absorbed by the District Council?

98

I support the Neighbourhood Plan and it would be good to know what proposals are being made by any prospective developer for Barrow with this proposed increase in population as a result of building 170 new houses?

There are concerns about creating more places at the primary school which is already running at capacity, with parking and traffic at the school, especially during drop-off and pick-up times already causing traffic congestion.

The doctor's surgery has long waiting times for appointments at the moment, so this will only increase with an extra village population. The whole infrastructure in the village will be affected, with roads hard-pressed to cope as a result of more people with their cars. The flooding down Bury Road caused by heavy rain needs to be addressed too and should this site be considered, the developers will need to consider traffic calming measures on this road into Bury?

It is hoped that the Neighbourhood Plan will proceed, which has the full support of the Parish Council which does try to address these issues by offering an alternative view.

So to summarise, it is hoped that any developer chosen, will bring plans together that support the village with financial benefits to use on these amenities, the school, the doctors surgery and the village hall, all of which are central to Barrow's needs and not pass any financial benefit meant for the village back to the District Council.

99

I feel in supporting the neighbourhood plan this will ensure the best possible outcomes for Barrow going forward.

100

Important that the future of Barrow is determined by those within the village

101

Why can the land allocated as site RV4 not be used as the Strategic Site Allocation for housing development, since the plan recommends business use to be included in that development? The plan has identified that a new housing development will include 'out commuters' so it would make sense for it to be to the north of the main village with simple access to the A14 and avoiding having vehicles go through the village centre and causing even more congestion at the current bottleneck outside the village shop (and now also Post Office) and also for dropping children off at the school. All of these potential problems would be minimised if the housing development was put at RV4, next to the school. Why can the constraints of the archeological sites north of the village not be overcome by excavation/preservation so that this land can be incorporated into the plan?

102

I think that the land allocated as site RV4 should be used as the Strategic Site Allocation for housing development, since the plan recommends business use to be included in that development. The plan has identified that a new housing development will include 'out commuters' so it would make sense for it to be to the north of the main village with simple access to the A14 and avoiding having vehicles go through the village centre and so causing even more congestion at the current bottleneck outside the village shop (and now also Post Office). Also, parents will want

to drop children off at the school, which will mean even more vehicles having to go through the centre of the village. All of these potential problems would be minimised if the housing development was put at RV4, right next to the school.

103

The 170 proposed houses appear to be inevitable as part of the West Suffolk plan and the hope is that this neighbourhood plan will give more say over location I am sure it would not stop at 170 houses without it either, so it can only be a good thing. I'm not sure if the necessity of employment areas or care facilities given our close access to both but that may be a requirement within the West Suffolk plan. The concept plan for new builds looks to be an improvement on what Bloor is attempting. It makes more sense to add on to the existing new development than to start a new one ,particularly a development so close to older existing houses and the potential then for them then to be linked with yet more houses. I personally think it's mad to build on good agricultural land.

104

There seems to be a disconnect between the 'Key Objectives' and the 'Strategy':-

As currently (seemingly) proposed, no amendments to the existing, historic Settlement Boundaries, themselves dating from 30+ years ago, appear to be proposed. Without amending these and making further small-scale allocations for residential development, there appears to be insufficient ability to deliver housing growth, with sole reliance upon a single, large, strategic development site.

In addition to the stated requirement to support new and existing community facilities, there also needs to be a Policy requirement to similarly ensure that suitable physical infrastructure is in place to deliver further large-scale housing growth, notably in respect of Education, Water Supply and Foul Drainage capacity.

105

1. It will create an increase in traffic, around an extra 300 vehicle movements per day through the entire length of the village, whereas the Bury Road and Colethorpe Lane sites will not have the same impact. Traffic from the Bury Road site when heading to Bury St Edmunds will go through Saxham and when going to the A14 or Mildenhall will only go through half the village. Colethorpe Lane housing would likely go directly to the A14 for the majority of journeys, completely avoiding the centre of the village.

2. Barrow Hill is a country road and not wide enough to be used as a main road and it has one pavement on one side only which is very narrow resulting in vehicles being dangerously close to pedestrians.

3. The results of the Parish Council's own 2020 Neighbourhood Plan Questionnaire, shows there was a village majority of 54.7% who voted for development in the part of Barrow by the school.

4. In fact, 81.9% of responders voted for sites other than Barrow Hill. The Parish Council's Neighbourhood Plan is therefore taking no notice of the wishes of the Parishioners, again as indicated in the Parish Council's own 2020 Neighbourhood Plan Questionnaire.

5. The Colethorpe Lane site provides homes nearer to the school enabling pedestrian access rather than driving all the way through the village and the developers' style of housing is much more in keeping with a village.

6. The proposed development is again to the south-east of the village, which has seen a disproportionate amount of new housing.

7. At 13.6 Ha, the preferred site is unnecessarily large to accommodate the housing requirement of 170 houses for Barrow. 13.6 Ha could house 400+ houses at 30 dwelling per Ha. This puts us at risk of overdevelopment. The Parish Council has failed to give due consideration to the protection of green space and the environment, contrary to parishioners' views shown in the Parish Council's own Report on Responses to Parish Questionnaire.

8. The Parish Council failed to give due regard to the parish's preferred area for development. The Report on Responses to Questionnaire is a supporting document for the Neighbourhood Plan. Question 32 of the Questionnaire asked 'if more homes had to be built in the parish, in which sector of the parish would you prefer that they were built?'. A map of the parish showed 4 sectors – north east, south east, south west & north west. The north west sector (4) was, by far, the most preferred sector, because of its situation near the A14.

9. The Parish Council rejected the site between Colethorpe Lane and Church Road because due regard was not given to material considerations regarding an existing site allocation and the settlement boundary. The Parish Council rejected the site on the grounds that it does not adjoin the settlement boundary. This is an overly narrow view of three material considerations. First, part of the site has already been allocated under policy Rural Vision 2031 of the current Local Plan for commercial/light industrial use and is therefore likely to alter the current settlement boundary within the timeframe of the Neighbourhood Plan. Accordingly, at least part of the site submitted in the Neighbourhood Plan would lie within a new settlement boundary. Second, it is in an area shown to be, by far, the most preferred in the parish consultation because of its situation near the A14. Third, the site is within or adjacent to the bounds of the actual, physical settlement.

10. There are no firm or legally binding commitments for provision of sports & recreation facilities, etc. It is therefore irrational for the Parish

Council to select a site which is less sustainable than others based on non-binding indications from landowners to provide such facilities.

11. The ranking of the Bury Road site on impact to the Historic Environment is based on factual errors in AECOM's Strategic Environmental Assessment. Contrary to this report, the Bury Road site has no impact on The Weeping Willow Public House or Barrow House. New lodges have recently been built right beside The Weeping Willow at a much greater proximity than the proposed Bury Road housing site.

12. The Neighbourhood Plan site selection has failed to consider the Bury Road Site properly. The Neighbourhood Plan contains multiple references to the issue of coalescence. The Bury Road site plan shows that the threat to coalescence is minimised by the inclusion of a substantial green, open space incorporating ponds for a sustainable drainage system at the north east of the site.

13. The Parish Council have ignored the results of AECOM's site appraisal to assess the identified sites to understand which, if any, are appropriate for allocation in the Neighbourhood Plan. The assessment looks at whether site locations and development proposals comply with the strategic policies of the adopted Development Plan. The report is also intended to help ensure that the basic conditions considered by the Independent Examiner are met, as well as preventing any potential legal challenges by developers and other interested parties (ref. AECOM's site options and assessment report 2021).

14. The provision of a care home in the Neighbourhood Plan is not evidence based.

106

The proposed residential plots will cause unsustainable strain on the village road networks which are already struggling to support the current village size. The side of the village where the residential plots are proposed is predominantly families with young children. Increased traffic will

only increase the safety risks on the roads for these families. The main access to that part of the village is from the A14, meaning the whole village will be impacted by circa 300 extra vehicles travelling through.

107

I write as a resident of Barrow in response to the draft Neighbourhood Plan presented to the parish in September and October 2023. I am a Parish Councillor but had no part in the preparation of the plan. These are my personal views of the Plan and of the briefing given in the Village Hall.

Summary

The draft Neighbourhood Plan presented to the Parish for comment 12th Sept – 24th Oct 2023 was an opportunity to inform the residents of the choices facing the Parish and to seek residents' views on the issues to be considered in the next version of the plan. It contains some good ideas and proposals. Sadly, overall, it is not fit for purpose and needs to be rewritten from scratch.

It is verbose.

It uses complex semi-legal language.

It contains many errors.

It is biased.

It omits important information thus compromising the readers' ability to comment accurately and in full.

It ignores independent objective evidence.

The planning adviser has a conflict of interest with Pigeon and with Bloor Homes. This has not been declared.

The document is awash with 'get out clauses' to excuse non-delivery of many desirable benefits.

A casual reader of the draft Neighbourhood Plan could be forgiven for thinking all the benefits described will come if they vote in favour of the plan.

I have numerous questions arising from the document. It is a very long document so you must expect a long list of questions. I list below the questions to be answered. Subsequent appendices give detailed analysis of the many defects in the Plan.

Questions

1. Do you really have a mandate for all these proposals ?
 2. Have you checked the reading age of the document ?
 3. Why do the Briefing notes propose up to three times as many four/five bedroom houses than suggested in AECOM's advice ?
 4. Why did you ignore the objective advice from AECOM and the Parish Council's own objective scoring when you made the site selection ?
 5. What was the reason for leaving the other sites out of the document ?
 6. Can you explain why the AECOM reports of June 2022 and September 2023 reach very different conclusions when there has been no change
-

in the objective evidence ?

7. Have you explained why West Suffolk Council's preferred site has been ignored in the Plan ?
8. What were the four parish councillors' reasons for voting for the Barrow Hill site ?
9. Why does the briefing note offer only 9 houses being suitable for home working while policy BCD2.7 wishes to facilitate remote working ?
10. Have you got references for the demographic data used in the document ?
11. Have you allowed for the opinions of new occupants of the 137 homes sold in Barrow since the original Parish consultation exercise ?
12. Did you or your Planning Consultants do a site visit on foot or bicycle when considering how and where to build the Pedestrian/cycle link ?
13. Precisely where will the Pedestrian/cycle link be built ?
14. Will any of the existing village facilities be directly served by the Pedestrian/cycle link ?
15. How will cycle ways mitigate the short car journeys and commuter traffic ?
16. What are your views on pollution from private cars and its impact on climate change ?
17. Why have the bus stops on Bury Road and the bus routes through the village been omitted ?
18. Where is the plan to sort out the chaotic bus routes and timetables ?
19. Have you or your agents tried to take a bus journey from Barrow to Bury ?
20. Has the Care Home proposal been subjected to a test of financial viability ?
21. Do you understand that Bungalows cannot be a substitute for a Care Home ?
22. Have you consulted local GPs about their capacity to service the needs of a Care Home ?
23. Please explain why we need BCD11. How does it add to existing regulations ?
24. Can you explain how new houses on the Bury Road or on the Barrow Hill sites will have an adverse effect on listed buildings ?
25. Will views of listed buildings, from public land be impaired by any of the sites considered ?
26. Have you done a site visit on foot of the Bury Road site to check views of listed buildings ?
27. Have you checked each new benefit to the village for viability ?
28. Pigeon's most recent presentation in the Village Hall showed sports pitches on the side of a hill. Is this wise ?
29. Can you explain how the new sporting facilities etc will be managed and funded in the long term ?
30. How many parishioners requested BCD3.3 on page 55 ?
31. How many landowners will benefit from BCD3.3 ?
32. Is BCD3.3 a vehicle for bypassing planning checks at a future date ?
33. How many parish residents are affected by BCD3.3 ?

I strongly prefer the barrow-cum-denham neighborhood plan over the "Bloor" plan (homes built south of Bury Road). I think it makes far more sense to extend the village south. Please keep up your good work!

109

Having read the Barrow cum Denham NP in detail, I disagree with the suitability of the development of the proposed site at Barrow Hill for a number of reasons.

The information I read under 'Active transport and Accessibility' caused me the greatest concern. A bullet point read the following,

- To help minimise the impact of future development on the existing local highway network.

Further development on Barrow Hill will without doubt bring additional traffic through the village, notably from the A14 exit, down The Street in the centre of the village and on to Barrow Hill. Traffic calming measures would not reduce this number. Further development on Barrow Hill would likely increase the already significant problem of HGVs using Barrow Hill. It should be noted too that a great number of HGVs and commercial vehicles use Barrow Hill as a 'cut-through' from the A14 to the A143. The majority of these do not adhere to the speed limit. It would not be possible to introduce a width restriction on the road as this would preclude farm vehicles who necessarily have to pass through the village.

The Parish Council have thus far been unable to successfully tackle the issues of speeding from all types of vehicles. They have also been unsuccessful in addressing the issues of HGVs and the danger that now exists for residents on a daily basis as a result of their speed and regularity through the village. Based on this it seems unlikely that the inevitable increase in traffic from a development of 170 houses would be successfully managed within the village.

Any such development on Barrow Hill would not 'improve the wider safety of the roads' which are already extremely busy for this size of village. Further development on Barrow Hill which is a narrow country village road would jeopardise the safety of those using that road and impact on the quality of life of those already resident there. Given this has changed significantly since the previous two developments either side of Barrow Hill in 2012 and 2016 a further development in this same area would seem a poor choice.

'Support for Business and Employment'

Several references are made to facilitating the development of new businesses and encouraging business growth. It is important that Barrow retains its village identity and atmosphere. As the document points out, Barrow-cum-Denham is already well served and there is little genuine need for additional business growth in this village or on Barrow Hill. Any such growth would risk attracting yet more traffic into the village and to Barrow Hill to make use of the businesses and this is contrary to the traffic management comments throughout the plan.

The phrase 'delivery of a new infrastructure that supports business growth and helps to facilitate sustainable new business creation' would seem more appropriate for a town than a village. The additional development of 170 homes on Barrow Hill plus the suggested businesses and care home are out of place for a village of this size. A point has been made in the NP document about the southern end of Barrow being already characterised by newer development. This in itself is a valid reason not to develop further on that side of the village. To do so would effectively create a village of 'two halves' which seems wrong and is certainly against the community spirit of Barrow. Whilst this may not be an economic argument and not one that influences any developer's decision, it is a moral one and one that effects all the residents of Barrow and one, I feel, should be given due consideration by planners. We value our village, the cohesion of it and the support within it. We should be looking to unite the village, not segregate a section of it through over-development.

Housing Supply and Sustainable New Homes

'To ensure that all new homes are well designed regarding their specific location and are well integrated with the existing scale, density and character of adjacent built development in the immediate area'.

This speaks to my point above. I appreciate the point being made here is that any new designs should blend in with properties already in situ, wherever they are in the village. However, if considered holistically, it can be appreciated that the density of new build properties at the southern end of Barrow is already considerable and to add another 170 on Barrow Hill would without doubt result in an unbalanced village. The southern end would become a modern sprawl, and this is not in the interests of the village as a whole long term. A more balanced approach should be sought which manages to retain the character of the village throughout the village. This would be more responsible and more ethical in terms of serving the village as a whole.

Active Transport and Accessibility

Reading the 'Active Transport and Accessibility' section of the NP carefully, there are clear contradictions within it which will impact current residents and those on the proposed new development.

It is stated that "provision' of parking spaces will be limited/minimised with a 'reduction in car parking standards over time.'

BCD12.4 Proposals for new development will be generally expected to minimise the provision of on plot car parking where achievable, for example by providing shared use parking as part of the Travel Plan.

ii. All new development proposals should seek to minimise on plot car parking provision in relation to adopted Local Plan standards and make allowance for possible reductions in car parking standards over time.

Yet earlier in the same section it is stated,

BCD2.3 In addition, through sensitive, detailed design, the development of the Site will also need to ensure that the existing residential amenities of residents in Beale Road, Bury Road, Dale Tree Road and Lion Green are suitably protected.

If there are inadequate parking facilities on any proposed development it will inevitably impact negatively on those who live adjacent to that new development, wherever that may be. If residents on a new development do not have enough space to park their vehicles on their own plots they will park on the roads and there will not be enough road space within the new development alone to accommodate all the vehicles. That is clear. They will therefore park on the nearest neighbouring public roads which will be Beale Road, Bury Road, Dale Tree Road and Lion Green as well as all the other surrounding roads. So the amenities of the residents are not being 'suitably protected' in these named roads, or other surrounding roads.

However much the developers and planners want to push the use of cycle tracks and the limited bus service, it is naïve to think that occupants in a development of 170 houses will be able to make such a lifestyle switch as this. People need to travel for work, health and social reasons and will use their cars. In a rural village, 59% of dwellings will have 2 or more cars (<https://www.gov.uk/government/collections/national-travel-survey-statistics>)

Roughly therefore, a development of 170 houses in Barrow could bring in excess of 340 cars. Adequate parking provision needs to be made for this number if it is not to negatively impact on the existing residents and they are indeed to be 'suitably protected' as stated in the NP.

Inadequate parking provision, both on new development and within village for increased number of cars

Over-development of southern end of village

Any additional development should be adjacent to A14 where the majority of traffic approach the village. Main street in the village already under strain from increased traffic - further increase not sustainable.

Barrow Hill already extremely busy, lots of traffic. Already feels overdeveloped. Further development here will ruin this part of the village.

111

I support the need to provide housing but so much has been built off Barrow Hill in recent years that it feels inappropriate that more should be developed in this area. It would change the feel of this end of the village in a negative way, by effectively making all the affordable housing in the south side of the village. This seems wrong. It should be spread throughout the village, to keep Barrow a balanced place.

Also, there is very much more traffic running through the main street and on to Barrow Hill than is safe at the moment. Very few drivers stick to the speed limit and the proximity of the large lorries is frightening when you are walking on the pavements on Barrow Hill. The road is not suitable for them, especially when they drive at such speeds. Another development on Barrow Hill would just bring more of the same.

Parking by the school would become even more of a problem with the addition of 170 more houses and any primary school aged child would be walking or more likely be driven up Barrow Hill twice a day, increasing traffic.

There are a number of sites in Barrow which are more suitable for development at this time, for example the site off Bury Rd or the area up by the school near to the A14 and these should be given proper consideration.

112

Separate written response sent with key supporting reasons.

113

The proposed housing is all planned for the Hargrave Road area and I think new housing should be distributed more evenly around the village. The site in Church Road would involve less traffic through the centre of the village with better access to the A14.

114

I object to the Parish Council's proposed Neighbourhood Plan for extra housing at Barrow Hill as outlined in the following representations:

Site selection - Barrow Hill

The Parish Council choice of site at Barrow Hill is NOT evidence-based. Site summary evaluation scoring taken from the Parish Council's own commissioned report from Aecom, was minuted in the Parish Council meeting dated 25/8/22 and shows site B (Bury Road) to have the highest score at 28.5 and site C (East & West of Barrow Hill & South of Barrow Forge) in 3rd place, with a score of 23. Following an exchange of Councillors' views, minuted in the same meeting, and also in the 'Extraordinary Meeting' dated 18/10/22, the Parish Council voted in favour of site C, a vote which was not evidence-based. (Colethorpe Lane, parishioners' preferred area for development, was excluded completely from the short-list of sites.)

The 5 sites selected by the Parish Council at the time of voting
(table shows Aecom's site assessment scoring for these sites) Scores Position

A West of Barrow Hill BD 12 22.5 4

B South of Bury Road BD 13 28.5 1

C East & West Barrow Hill & South of Barrow Forge BD 6, 8, 12 23 3

D East & West Barrow Hill & South of Barrow Forge & South of Denham Lane BD 6, 8, 12, 9 20 5

E South of Bury Road & South of Denham Lane BD 9 & 13 26 2

The Bury Road site (B), seems to have been reduced in size to include the western part only, in the 'Strategic Environment Assessment, September 2023 (Reg 14)', but has still been referred to as BD13 (the reference for the site as a whole). The effect is that it changes the evaluation of the site and presents it in a more negative manner, which better supports the Neighbourhood Plan site preference. Site size and evaluation criteria cannot be changed after site selection has taken place.

West Suffolk's housing allocation for Barrow is for 170 dwellings, nothing else. The provision of a care home, commercial and all other extra buildings at Barrow Hill, included in the Neighbourhood Plan, are not evidence-based. Parishioners did not express a desire for any of these in the Parish Council's own 2020 Neighbourhood Plan Questionnaire (a supporting document for the neighbourhood plan). So why would the Parish Council want to cover much more of Barrow's countryside with concrete than is necessary.

As the neighbourhood plan preferred site at Barrow Hill, is unnecessarily large to accommodate the West Suffolk allocation of 170 houses for Barrow, there is a risk of additional housing (or other buildings), as 13.6 Hectares at 30 dwellings per Hectare (national minimum density target) would accommodate 400+ houses, if the care home, commercial and other extra buildings are not taken up.

By selecting a site that is different to that in the West Suffolk emerging Local Plan, there is a risk that the dwellings at Barrow Hill will be built in addition to those in the West Suffolk emerging Local Plan, resulting in 340 houses instead of the requirement of 170.

An extra circa 300 vehicle movements per day which affect the entire length of the village and impact heavily on Barrow Hill, will be created from the housing allocation of 170 dwellings alone. If the Neighbourhood Plan proposed care home, commercial buildings and other facilities are taken into account, this will create many more daily vehicle movements. Whereas Colethorpe Lane is easily accessible from the A14 and the Bury Road site from Bury St Edmunds.

Construction traffic will likewise have to ply backwards and forwards along Barrow Hill and The Street to build a development at Barrow Hill. Barrow Hill is a country road and not wide enough to be used as a main road. It has one narrow pavement, on one side only resulting in vehicles being dangerously close to pedestrians. The proposed increase in traffic will exacerbate this further.

Cycle paths identified in the plan don't go anywhere, and there is no opportunity for future expansion along Barrow Hill as the road isn't wide enough.

The Street and Barrow Hill are prone to flooding, causing cars to drive extremely slowly through very deep water and creating high water movement at the sides of the road, drenching pedestrians. The village, like most other villages, has ancient drainage systems of gullies at the side of the road, which were not intended to support the increase in development currently asked of them.

There has been a disproportionate amount of new housing in the south-east of the village, and the proposed development, is again at Barrow Hill.

There is a risk of Barrow Hill becoming one large urban area of new houses which will spoil the village and create a satellite area.

When driving into the village from Hargrave, the southern gateway to the village, the proposed site at Barrow Hill will be particularly visible for some distance, and likewise when driving in from the east along Bury Road, causing the natural view of the village and its distinctiveness as a rural area to be compromised.

The ancient woods, 'Wilsummer Woods' and County Wildlife Site would be in very close proximity to the proposed development and the building of new houses will permanently affect the surroundings in which this heritage asset is experienced, and as the site is on a hill, will pose an increased risk to flooding which could affect this heritage area.

The process

A misleading statement, minuted from the Parish Council meeting of 5/9/22, records that the Parish Council Chair "reminded residents ... that if the Neighbourhood Plan is voted down the village will be totally exposed." This statement is misleading since it gives parishioners the impression

that if they vote against the Neighbourhood Plan, the parish might be subject to large scale over-development.

Contrary to this, the actual situation is that at the same time, up until September 2022, West Suffolk Council had published modest site allocations in their emerging Local Plan for preferred housing sites at Denham Lane & Bury Road.

The consultants, Turley, that have been engaged to draft the Neighbourhood Plan and supporting Regulation 14 information are the same consultants as used by Barrow Hill landowners/Pigeon. It would be irrational to believe that Turley do not feel some commercial pressure to serve the interests of a large customer such as Pigeon rather than serving the interests of the Barrow parishioners, and a certain conflict of interests exists.

Site selection – land between Colethorpe Lane and Church Road (by the school)

Parishioners' preferred area for development, was excluded from the short-list of sites, when the Parish Council voted on site selection in October 2022. The results of the Parish Council's own 2020 Neighbourhood Plan Questionnaire, a leading document for the neighbourhood plan, shows a village majority of 54.7% voted for development in the part of Barrow to the North of the village, between Colethorpe Lane and Church Road. (In fact, 81.9% of responders voted for areas of the village other than Barrow Hill.)

Some of the advantages of developing in the Colethorpe Lane/Church Road area are that the developer has offered to gift one hectare of land, to the school, to use if they require it and as they see fit. The increase of 170 dwellings in the village, will put extra pressure on the school to support those children in the catchment area. The Colethorpe Lane/Church Road site is in a sustainable location and will have less of an impact on traffic movements through the village as vehicles are likely to travel towards the A14. The site is adjacent to the school so reducing the number of cars through the village at the time of school runs, and yet still within a 10 minute, walk of other local amenities. There is potential for additional traffic calming to be introduced along Colethorpe Lane as part of the proposals, subject to agreement with the County Council. The purpose of a Neighbourhood Plan is to represent parishioners' views, aspirations, and preferences. Parishioners have queried why the Colethorpe Lane/Church Road site, hasn't been included in the Neighbourhood Plan many times, in Parish Council meetings and through correspondence.

The site between Colethorpe Lane and Church Road was rejected by the Parish Council on the grounds that it doesn't adjoin the settlement boundary. However, it seems that the site is within or adjacent to the bounds of the actual, physical settlement. And it would also seem that part of the site has already been allocated under the current Local Plan and is therefore likely to change the current settlement boundary within the timeframe of the Neighbourhood Plan. It would seem, that the school itself, doesn't sit within the settlement boundary either, an anomaly that has existed for some time and which at some point will need to be addressed, and could have been done at the same time as this site. A letter sent to the Parish Council and read out during the meeting dated 17/7/23, questioned a Parish Council response in the previous meeting, which referred to West Suffolk Council's allocation of sites in their emerging Local Plan for Barrow, when again the question was raised as to why

the Colethorpe Lane/Church Road site wasn't being considered as part of the Neighbourhood Plan. The letter stated that, 'According to the relevant sections of the National Planning Policy Guidance: "Plan Making" and "Neighbourhood Planning" ... can allocate ... alternative sites to those in an emerging local plan where it is supported by evidence to demonstrate need/local circumstances which differ from those identified in an emerging local plan.'

Site selection – Bury Road

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- It required just one new access road, as opposed to two for Barrow Hill, on opposite sides of the road
- It did not extend the village envelope, as would the Barrow Hill option
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Site selection – Denham Lane

The Parish Council rejection of the Denham Lane site, on the grounds that it would 'close the gap between Barrow and Denham' is irrational. The Denham Lane site being a small site (0.66Ha), suitable for around 20 dwellings, its shape means that erosion of any green space between Denham and Barrow is minimal. Notably, the site was selected by West Suffolk Council, along with Bury Road, a site selection which is evidence-based and established on the highest evaluation ranking site.

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The 5 sites selected by the Parish Council at the time of voting
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D East & West Barrow Hill & South of Barrow Forge & South of Denham Lane BD 6, 8, 12, 9 20 5

E South of Bury Road & South of Denham Lane BD 9 & 13 26 2

The Bury Road site (B), seems to have been reduced in size to include the western part only, in the 'Strategic Environment Assessment, September 2023 (Reg 14)', but has still been referred to as BD13 (the reference for the site as a whole). The effect is that it changes the

evaluation of the site and presents it in a more negative manner, which better supports the Neighbourhood Plan site preference. Site size and evaluation criteria cannot be changed after site selection has taken place.

West Suffolk's housing allocation for Barrow is for 170 dwellings, nothing else. The provision of a care home, commercial and all other extra buildings at Barrow Hill, included in the Neighbourhood Plan, are not evidence-based. Parishioners did not express a desire for any of these in the Parish Council's own 2020 Neighbourhood Plan Questionnaire (a supporting document for the neighbourhood plan). So why would the Parish Council want to cover much more of Barrow's countryside with concrete than is necessary.

As the neighbourhood plan preferred site at Barrow Hill, is unnecessarily large to accommodate the West Suffolk allocation of 170 houses for Barrow, there is a risk of additional housing (or other buildings), as 13.6 Hectares at 30 dwellings per Hectare (national minimum density target) would accommodate 400+ houses, if the care home, commercial and other extra buildings are not taken up.

By selecting a site that is different to that in the West Suffolk emerging Local Plan, there is a risk that the dwellings at Barrow Hill will be built in addition to those in the West Suffolk emerging Local Plan, resulting in 340 houses instead of the requirement of 170.

An extra circa 300 vehicle movements per day which affect the entire length of the village and impact heavily on Barrow Hill, will be created from the housing allocation of 170 dwellings alone. If the Neighbourhood Plan proposed care home, commercial buildings and other facilities are taken into account, this will create many more daily vehicle movements. Whereas Colethorpe Lane is easily accessible from the A14 and the Bury Road site from Bury St Edmunds.

Construction traffic will likewise have to ply backwards and forwards along Barrow Hill and The Street to build a development at Barrow Hill.

Barrow Hill is a country road and not wide enough to be used as a main road. It has one narrow pavement, on one side only resulting in vehicles being dangerously close to pedestrians. The proposed increase in traffic will exacerbate this further.

Cycle paths identified in the plan don't go anywhere, and there is no opportunity for future expansion along Barrow Hill as the road isn't wide enough.

The Street and Barrow Hill are prone to flooding, causing cars to drive extremely slowly through very deep water and creating high water movement at the sides of the road, drenching pedestrians. The village, like most other villages, has ancient drainage systems of gullies at the side of the road, which were not intended to support the increase in development currently asked of them.

There has been a disproportionate amount of new housing in the south-east of the village, and the proposed development, is again at Barrow Hill.

There is a risk of Barrow Hill becoming one large urban area of new houses which will spoil the village and create a satellite area.

When driving into the village from Hargrave, the southern gateway to the village, the proposed site at Barrow Hill will be particularly visible for some distance, and likewise when driving in from the east along Bury Road, causing the natural view of the village and its distinctiveness as a

rural area to be compromised.

The ancient woods, 'Wilsummer Woods' and County Wildlife Site would be in very close proximity to the proposed development and the building of new houses will permanently affect the surroundings in which this heritage asset is experienced, and as the site is on a hill, will pose an increased risk to flooding which could affect this heritage area.

The process

A misleading statement, minuted from the Parish Council meeting of 5/9/22, records that the Parish Council Chair "reminded residents ... that if the Neighbourhood Plan is voted down the village will be totally exposed." This statement is misleading since it gives parishioners the impression that if they vote against the Neighbourhood Plan, the parish might be subject to large scale over-development.

Contrary to this, the actual situation is that at the same time, up until September 2022, West Suffolk Council had published modest site allocations in their emerging Local Plan for preferred housing sites at Denham Lane & Bury Road.

The consultants, Turley, that have been engaged to draft the Neighbourhood Plan and supporting Regulation 14 information are the same consultants as used by Barrow Hill landowners/Pigeon. It would be irrational to believe that Turley do not feel some commercial pressure to serve the interests of a large customer such as Pigeon rather than serving the interests of the Barrow parishioners, and a certain conflict of interests exists.

Site selection – land between Colethorpe Lane and Church Road (by the school)

Parishioners' preferred area for development, was excluded from the short-list of sites, when the Parish Council voted on site selection in October 2022. The results of the Parish Council's own 2020 Neighbourhood Plan Questionnaire, a leading document for the neighbourhood plan, shows a village majority of 54.7% voted for development in the part of Barrow to the North of the village, between Colethorpe Lane and Church Road. (In fact, 81.9% of responders voted for areas of the village other than Barrow Hill.)

Some of the advantages of developing in the Colethorpe Lane/Church Road area are that the developer has offered to gift one hectare of land, to the school, to use if they require it and as they see fit. The increase of 170 dwellings in the village, will put extra pressure on the school to support those children in the catchment area. The Colethorpe Lane/Church Road site is in a sustainable location and will have less of an impact on traffic movements through the village as vehicles are likely to travel towards the A14. The site is adjacent to the school so reducing the number of cars through the village at the time of school runs, and yet still within a 10 minute, walk of other local amenities. There is potential for additional traffic calming to be introduced along Colethorpe Lane as part of the proposals, subject to agreement with the County Council. The purpose of a Neighbourhood Plan is to represent parishioners' views, aspirations, and preferences. Parishioners have queried why the Colethorpe Lane/Church Road site, hasn't been included in the Neighbourhood Plan many times, in Parish Council meetings and through

correspondence.

The site between Colethorpe Lane and Church Road was rejected by the Parish Council on the grounds that it doesn't adjoin the settlement boundary. However, it seems that the site is within or adjacent to the bounds of the actual, physical settlement. And it would also seem that part of the site has already been allocated under the current Local Plan and is therefore likely to change the current settlement boundary within the timeframe of the Neighbourhood Plan. It would seem, that the school itself, doesn't sit within the settlement boundary either, an anomaly that has existed for some time and which at some point will need to be addressed, and could have been done at the same time as this site.

A letter sent to the Parish Council and read out during the meeting dated 17/7/23, questioned a Parish Council response in the previous meeting, which referred to West Suffolk Council's allocation of sites in their emerging Local Plan for Barrow, when again the question was raised as to why the Colethorpe Lane/Church Road site wasn't being considered as part of the Neighbourhood Plan. The letter stated that, 'According to the relevant sections of the National Planning Policy Guidance: "Plan Making" and "Neighbourhood Planning" ... can allocate ... alternative sites to those in an emerging local plan where it is supported by evidence to demonstrate need/local circumstances which differ from those identified in an emerging local plan.'

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I am against the proposed site for development (Barrow Hill) in the Neighbourhood Plan on the following grounds:

1. It will create an increase in traffic, around an extra 300 vehicle movements per day through the entire length of the village, whereas the Bury Road and Colethorpe Lane sites will not have the same impact. Traffic from the Bury Road site when heading to Bury St Edmunds will go through Saxham and when going to the A14 or Mildenhall will only go through half the village. Colethorpe Lane housing would likely go directly to the A14 for the majority of journeys, completely avoiding the centre of the village.
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2. Barrow Hill is a country road and not wide enough to be used as a main road and it has one pavement on one side only which is very narrow resulting in vehicles being dangerously close to pedestrians.

3. The results of the Parish Council's own 2020 Neighbourhood Plan Questionnaire, shows there was a village majority of 54.7% who voted for development in the part of Barrow by the school.

4. In fact, 81.9% of responders voted for sites other than Barrow Hill. The Parish Council's Neighbourhood Plan is therefore taking no notice of the wishes of the Parishioners, again as indicated in the Parish Council's own 2020 Neighbourhood Plan Questionnaire.

5. The Colethorpe Lane site provides homes nearer to the school enabling pedestrian access rather than driving all the way through the village and the developers' style of housing is much more in keeping with a village.

6. The proposed development is again to the south-east of the village, which has seen a disproportionate amount of new housing.

7. At 13.6 ha, the preferred site is unnecessarily large to accommodate the housing requirement of 170 houses for Barrow. 13.6 ha could house 400+ houses at 30 dwelling per ha. This puts us at risk of overdevelopment. The Parish Council has failed to give due consideration to the protection of green space and the environment, contrary to parishioners' views shown in the Parish Council's own Report on Responses to Parish Questionnaire.

8. The Parish Council failed to give due regard to the parish's preferred area for development. The Report on Responses to Questionnaire is a supporting document for the Neighbourhood Plan. Question 32 of the Questionnaire asked 'if more homes had to be built in the parish, in which sector of the parish would you prefer that they were built?'. A map of the parish showed 4 sectors – north east, south east, south west & north west. The north west sector (4) was, by far, the most preferred sector, because of its situation near the A14.

9. The Parish Council rejected the site between Colethorpe Lane and Church Road because due regard was not given to material considerations regarding an existing site allocation and the settlement boundary. The Parish Council rejected the site on the grounds that it does not adjoin the settlement boundary. This is an overly narrow view of three material considerations. First, part of the site has already been allocated under policy Rural Vision 2031 of the current Local Plan for commercial/light industrial use and is therefore likely to alter the current settlement boundary within the timeframe of the Neighbourhood Plan. Accordingly, at least part of the site submitted in the Neighbourhood Plan would lie within a new settlement boundary. Second, it is in an area shown to be, by far, the most preferred in the parish consultation because of its

location near the A14. Third, the site is within or adjacent to the bounds of the actual, physical settlement.

10. There are no firm or legally-binding commitments for provision of sports & recreation facilities, etc. It is therefore irrational for the Parish Council to select a site which is less sustainable than others based on non-binding indications from landowners to provide such facilities.

11. The provision of a care home in the Neighbourhood Plan is not evidence-based.

12. The ranking of the Bury Road site on impact to the Historic Environment is based on factual errors in AECOM's Strategic Environmental Assessment. Contrary to this report, the Bury Road site has no impact on The Weeping Willow Public House or Barrow House. New lodges have recently been built right beside The Weeping Willow at a much greater proximity than the proposed Bury Road housing site.

13. The Neighbourhood Plan site selection has failed to consider the Bury Road Site properly. The Neighbourhood Plan contains multiple references to the issue of coalescence. The Bury Road site plan shows that the threat to coalescence is minimised by the inclusion of a substantial green, open space incorporating ponds for a sustainable drainage system at the north east of the site.

14. The Parish Council have ignored the results of AECOM's site appraisal to assess the identified sites to understand which, if any, are appropriate for allocation in the Neighbourhood Plan. The assessment looks at whether site locations and development proposals comply with the strategic policies of the adopted Development Plan. The report is also intended to help ensure that the basic conditions considered by the Independent Examiner are met, as well as preventing any potential legal challenges by developers and other interested parties (ref. AECOM's site options and assessment report 2021).

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Although I am relatively new to Barrow, in the last 2 years I have found it to be a lovely village both for walks and the people who have been most welcoming. I therefore can only comment on a few things concerning me as I have got to know the layout of the village. I walk regularly on some of the proposed sites relating to Barrow Hill. During these walks I have come across a great deal of wildlife including deer, hare, voles and this summer have seen birds returning to the area including gold finches, tits, red kite and owls. These had not been present in my first year in Beale Road due I suspect to the development. I implore you to try to avoid the designated areas BD6, 8 and 12 and not to drive these creatures out of their homes.

I am also extremely worried about the surface water on these sites and pity people moving into homes which have obviously been built on sodden ground. I have first hand experience of poor drainage and no wonder the Council are reluctant to adopt the already badly built roads due

to poor drainage.

I appreciate the need for houses to be built to accommodate our ever growing population and indeed would welcome new people into the village as I have been but I feel the area around the school end of the village would be more appropriate.

119

I am against the proposed site for development in the Neighbourhood Plan (Barrow Hill) on the following grounds:

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 2. Barrow Hill is a country road not wide enough to be used as a main road and it has one very narrow pavement on one side only resulting in vehicles being dangerously close to pedestrians.
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 5. The Colethorpe Lane site provides homes nearer to the school enabling pedestrian access rather than driving all the way through the village and the developers' style of housing is much more in keeping with a village.
 6. The proposed development is again to the south-east of the village, which has received a disproportionate amount of new housing.
 7. At 13.6 hectares, the preferred site is unnecessarily large to accommodate the housing requirement of 170 houses for Barrow. This puts us at risk of overdevelopment.
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11. The ranking of the Bury Road site on impact to the Historic Environment is based on factual errors in AECOM's Strategic Environmental Assessment. Contrary to this report, the Bury Road site has no impact on The Weeping Willow Public House or Barrow House. New lodges have recently been built right beside The Weeping Willow at a much greater proximity than the proposed Bury Road housing site.

12. The Neighbourhood Plan site selection has failed to consider the Bury Road Site properly. The Neighbourhood Plan contains multiple references to the concept of coalescence. The Bury Road site plan shows that the threat of coalescence is minimised by the inclusion of a substantial green, open space incorporating ponds for a sustainable drainage system at the north-east of the site.

13. The Parish Council have ignored the results of AECOM's site appraisal to assess the identified sites to understand which, if any, are appropriate for allocation in the Neighbourhood Plan. The assessment looks at whether site locations and development proposals comply with the strategic policies of the adopted Development Plan. The report is also intended to help ensure that the basic conditions considered by the Independent Examiner are met, as well as preventing any potential legal challenges by developers and other interested parties (ref. AECOM's site options and assessment report 2021).

120

1. It will create an increase in traffic, around an extra 300 vehicle movements per day through the entire length of the village, whereas the Bury Road and Colethorpe Lane sites will not have the same impact.

2. Barrow Hill is a country road not wide enough to be used as a main road and it has one very narrow pavement on one side only resulting in

vehicles being dangerously close to pedestrians.

3. The results of the Parish Council's own 2020 Neighbourhood Plan Questionnaire, shows there was a village majority of 54.7% who voted for development in the area of Barrow by the school.

4. In fact, 81.9% of responders voted for sites other than Barrow Hill. The Parish Council's Neighbourhood Plan is therefore taking no notice of the Parishioners' wishes, again as indicated in the Parish Council's own 2020 Neighbourhood Plan Questionnaire.

5. The Colethorpe Lane site provides homes closer to the school enabling pedestrian access rather than driving all the way through the village and the developers' style of housing is much more in keeping with a village.

6. The proposed development is again to the south-east of the village, which has received a disproportionate amount of new housing.

7. At 13.6 hectares, the preferred site is unnecessarily large to accommodate the housing requirement of 170 houses for Barrow. This puts us at risk of overdevelopment.

8. The Parish Council rejected the site between Colethorpe Lane and Church Road because due regard was not given to material considerations relating to an existing site allocation and the settlement boundary. The Parish Council rejected the site on the grounds that it does not adjoin the settlement boundary. This is an overly narrow view of three material considerations. First, part of the site has already been allocated under policy Rural Vision 2031 of the current Local Plan for commercial/light industrial use and is therefore likely to alter the current settlement boundary within the timeframe of the Neighbourhood Plan. Accordingly, at least part of the site submitted in the Neighbourhood Plan would lie within a new settlement boundary. Second, it is in an area shown to be, by far, the most preferred in the parish consultation because of its location near the A14. Third, the site is within or adjacent to the bounds of the actual, physical settlement.

9. There are no firm or legally-binding commitments for provision of sports and recreation facilities, etc. It is therefore irrational for the Parish Council to choose a site which is less sustainable than the others based on non-binding indications from landowners to provide these facilities.

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121

1. It will create an increase in traffic, around an additional 300 vehicle movements per day through the entire length of the village, whereas the Bury Road and Colethorpe Lane sites will not have the same impact.

2. Barrow Hill is a country road not wide enough to be used as a main road and it has one very narrow pavement on one side only resulting in vehicles being dangerously close to pedestrians.

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13. The provision of a care home in the Neighbourhood Plan is not evidence-based.

122

Comments on behalf of The Saxhams Parish Council

The Barrow Neighbourhood Plan must stress that expansion of this Key Service Centre is supported by appropriate upgrades to facilities and infrastructure so that neighbouring villages such as Little Saxham and Great Saxham are not unfairly impacted. Specifically the Primary Healthcare Centre and Barrow CEVC Primary School capacity must increase in line with the proposed developments.

The Neighbourhood Plan focuses residential development to the South of the village thereby requiring negotiation of a traffic-calmed and congested route through the centre of Barrow to access the A14 J40 to travel East or West. Further consideration should be given to expanding the settlement boundary to the North of the village to allow housing allocation adjacent to the School to overcome this problem and reduce traffic flows that will impact on other local villages.

123

The Parish Council choice of site at Barrow Hill is not evidence-based. Site summary scores taken from the Parish Council's own Aecom report, were minuted in the Parish Council meeting dated 25.8.2022 and shows site B (Bury Road) to have the highest score at 28.5 and site C (East & West of Barrow Hill & South of Barrow Forge) in 3rd place, with a score of 23.

After an exchange of views, the Parish Council voted in favour of site C, a vote which was not evidence-based but based on personal opinions and preferences. (Colethorpe Lane, parishioners' preferred area, was excluded completely from the Parish Council short-list of sites.)

~300 extra vehicle movements per day which affect the entire length of the village and impact heavily on Barrow Hill, new residents to Barrow

will more than likely be needing to access the A14 and so will have to drive through the whole village to get back out to that side.

This increase in traffic will impact on road safety and noise pollution, as it is a country road intended for low-level traffic. Locating the new development at Site C will lead to road collisions towards the centre of the village as there are already issues in the morning/evening with the number of vehicles passing each other.

The Barrow ducks and other wildlife that reside in the centre of our village will very much be adversely affected should the new development be placed in Site C.

The proposed site between Colethorpe Lane and Church Road seems to be the most suitable due to it providing direct access out of the village towards the A14 which will be where the vast majority of new residents will be driving each day. It would provide new housing which is desperately needed, without the adverse affects to the village centre that would come with the other two proposed sites.

124

very concerned about increased traffic through village and pressure on electricity supply and other services

125

In principle this is not my preferred site, which would be on Coalthorpe Road. I feel the Parish council gave in on fighting for that site. But if the two that are open for discussion this is my preference rather than Bury Road

The NP should be referencing a max house build number rather than approx as dependent on site layout and property sizes more houses could fit on the site.

Based on the above and maximum property numbers should the number of affordable houses be proposed. Barrow is a very middle class village and more larger properties encourages this trend further.

Is there really a demand for care home/ assisted living in rural Barrow? If so the development of the houses should be made dependent on the development of the care home/ assisted living

There is already land allocated within Barrow for employment, this has never been utilised and should be before further land is made available.

The proposals show allotments? Why when there are already two sites available in the village.

The shape of the proposed site does not follow the natural landscape of failed boundaries? Why? This will decrease the natural biodiversity of the site and require additional compensation. There should be stringent biodiversity Gains set out, such as substantial tree and hedge planting to site boundary to soften the impact on the field and create a hard stop line to the village development boundary to reduce further growth.

126

I don't feel the infrastructure will sustain that amount of additional houses, the school is already full, my grandchildren whom are already living in barrow couldn't even get into the pre school/nursery as the waiting list was told 'still needed to be pregnant when applying'
The doctors surgery are already running at full capacity, the added traffic will turn our tranquil little village into a place like Thurston!
The cycle route goes to no where, the roads can't take an extra 300 approx cars, the village is always flooded, roads too narrow, foot path too narrow, cars drive very close to pedestrians, I don't agree with this at all

127

BCD2 new site off Barrow Hill. I currently live on Beale Road which is my declared interest, however my objection to building in this area is as follows:-

Drainage- The New Hopkin homes estate completion December 21. This estate has major problems with both foul water and surface water - the attenuation basins appear to work on and off but the water is released down into the field where drainage work was untaken early in 2023 but to little effect and there had been a pool of stagnant water (in BEc2) during summer 23. Therefore with evidence of a current poor drainage system in this area which could have been regenerated with the woodland rise developers but simply digging and installing or updating with mole drains but clearly have chosen not too due to costs? There is now logged water in this area due to the heavy rains over the pass week but again the drainage problems are great in this area and would therefore not be the best area to build/on due to the future water flooding.

If the foul water uses the same pump system that is currently in use on the woodland rise site again this would not be fit for purpose to pump up to the main Barrow Hill main drain. Better infrastructure and water treatment needs to be fully addressed sadly on what is a 2 year old building project before any new development should take place in this area.

In terms of the "Rural Vision" mentioned in 2.15 the area has a large herd of native deer that take shelter in this area along with some great wildlife habitat. Again, I can only comment as a Beale Resident as we were promised both wildflowers areas (currently used as a stating post for the recent new pathway) - this area is now a mud bath. New Bat and Bird boxes that were promised but the developers have never appeared.

I think the developers should be held accountable against original plans and therefore any "promises" of them fixing big problems like drainage

that have a negative impact on the environment should be investigated before any more box houses are built. As part of Suffolk County Council's wish to be the greenest county in England more sensitive reports should be made into the effect of both drainage management and wildlife conservation before construction companies are allowed to tender plans just based on number of house that could fit into this area.

128

I believe the proposed site will heavily increase traffic and journeys throughout the village, especially to the school which would easily be a 30-40 minute walk from the proposed site.

This is not supportive of the governments vision of reducing carbon footprint and with another more central site clearly viable I fail to see why the proposed site is being putting forward when I believe it'll be worse for the village and it's residents!

129

Please find below my reasons for opposing the vision;

There is a risk of Barrow Hill becoming one large urban area of new houses which will spoil an already large village and create a satellite area.

The results go the Parish Councils own 2020 Neighbourhood Plan questionnaire shows that there was a village majority of 54.7% who voted for the development in the part of Barrow by the school _ the Colethorpe Lane site.

The Colethorpe Lane site is nearer to the A14 and will not bring traffic through the village. It provides homes nearer to the school enabling pedestrian access rather than vehicles driving through the village.

At 13.6 ha the preferred site is unnecessarily large to accommodate the housing requirement of 170 houses for Barrow. 13.6ha could accommodate 400+ houses at 30 dwellings/ha. This puts this site at risk of over development.

The Parish Council has failed to give due consideration to the green space and the environment, contrary to parishioners views shown in the Parish Councils own report on responses to Parish Questionnaire.

The Parish Council failed to give due regard to the parish's preferred area for development. The report on Responses to Questionnaire is a supporting document for the Neighbourhood Plan. Question 32 of said questionnaire asked "if more homes had to be built in the Parish, in which sector of the Parish would you prefer that they were built?" A map of the Parish showed 4 areas - north east, south east, south west and north west. The North west (4) sector was, by far, the most preferred sector because of its position near the A14.

The Parish Council rejected the site between colethorpe lane and Church Road because due regard was not given to material considerations regarding an existing site allocation and the settlement boundary. The Parish council rejected the site on the grounds it does not adjoin the settlement boundary. This is an overly narrow view of three material considerations - a) part of the site has already been allocated under Policy Rural Vision 2031 of the current Local Plan for commercial/light industrial use and is therefore more likely to alter the current settlement boundary within the timeframe of the Neighbourhood Plan. accordingly at least part of the site submitted in the Neighbourhood Plan would lie

within a new settlement boundary. b) it is in an area shown to be by far the most preferred because of its proximity to the A14, c) the site is within or adjacent to the bounds of the actual physical settlement.

there are no firm or legally binding commitments for the provision of sports and recreation facilities etc. It is therefore irrational for the Parish Council to select a site which is which is less sustainable than others based on non binding indications from landowners to provide such facilities. The ranking of the Bury Road site impact to the Historic Environment is based on factual errors in AECOM's Strategic Environmental Assessment. Contrary to this report the Bury Road site has no impact on the Weeping Willow Public House or Barrow House. new lodges have been recently built behind the Weeping Willow at a much greater proximity than the proposed Bury Road site. The Neighbourhood Plan site selection has failed to consider the Bury Road site properly. the Neighbourhood Plan contains multiple references to the issue of coalescence. the Bury Road site plan shows the threat to coalescence is minimised by the inclusion of a substantial green open space, incorporating ponds for a sustainable drainage system at the north east of the site.

the Parish Council have ignored the results of AECOM's site appraisal to assess the identified sites to understand which, if any, are appropriate for the allocation in the Neighbourhood Plan. The assessment looks at whether the site locations and development proposals comply with the strategic policies of the adopted development plan. The report is also intended to help ensure that the basic conditions considered by the independent examiner are met, as well as preventing any potential legal challenges by developers and other interested parties (ref. AECOM's site options and assessment report 2021)

The provision of a Care Home in the Neighbourhood Plan is not evidence based.

The impact on the local wildlife will be massive.

130

I object to the Neighbourhood Plan to build 170 homes on the Barrow Hill site as proposed. There is already too much traffic through the village on Barrow Hill and users do not adhere to the 30mph speed limit at all hours. In addition, increased traffic along Barrow Hill would be detrimental to the water fowl population. Many of the ducks walk up to the Woodlands Rise development off Barrow Hill and sadly quite a few were killed by careless drivers. Any new development sites would benefit from roundabouts at the entrance/exits of the development because traffic at peak times makes it difficult to access the main road safely.

The preferred development site is off Church Road and Colethorpe Lane (by the school). Traffic through the village would not be impacted and it would allow parents to walk their children to school. Even the proposed site off of Bury Road would be less of an impact through the village.

I recommend that the Parish Council reconsider the Church Road site as it was preferred by more than 50% of the village residents. I object to

the Barrow Hill site as it shows no regard for the accessibility or preserving the aesthetics of the village and is just merely an extension of Hopkins Homes recently built development.

131

I object to the Parish Council's proposed Neighbourhood Plan for extra housing at Barrow Hill as outlined in the following representations:

Site selection - Barrow Hill

The Parish Council choice of site at Barrow Hill is NOT evidence-based. Site summary scores taken from the Parish Council's own Aecom report, were minuted in the Parish Council meeting dated 25/8/22 and shows site B (Bury Road) to have the highest score at 28.5 and site C (East & West of Barrow Hill & South of Barrow Forge) in 3rd place, with a score of 23.

After an exchange of views, the Parish Council voted in favour of site C, a vote which was not evidence-based but based on personal opinions and preferences.

(Colethorpe Lane, parishioners' preferred area, was excluded completely from the Parish Council short-list of sites.)

Barrow Hill is a country road and not wide enough to be used as a main road. It has one narrow pavement, on one side only resulting in vehicles being dangerously close to pedestrians. The proposed increase in traffic will exacerbate this further.

Cycle paths identified in the plan don't go anywhere, and there is no opportunity for future expansion along Barrow Hill as the road isn't wide enough.

For any site which is chosen, I believe there should be a greater need for speed calming measures on the main road.

Any new development would need to make implement an effective speed calming scheme.

The village of Westley just outside Bury St Edmunds has successfully introduced chicanes as a speed-calming measure. Potentially this could be used with great effect in Barrow.

Furthermore, by implementing another in-direct speed control, by using a roundabout, creates a natural slowdown of vehicles at any new entrance . This would create a much safer environment for people to be able to cross safer.

The Street and Barrow Hill are prone to flooding, causing cars to drive extremely slowly through very deep water and creating high water movement at the sides of the road, drenching pedestrians. The village, like most other villages, has ancient drainage systems of gullies at the side of the road, which were not intended to support the increase in development currently asked of them. (Bloor Homes for the Bury Road site, have included new drainage for a part of Bury road that floods.)

There has been a disproportionate amount of new housing around the south of the village, and the proposed development, is again at Barrow Hill.

There is a risk of Barrow Hill becoming one large urban area of new houses which will spoil the village and create a satellite area.

When driving into the village from Hargrave, the proposed site at Barrow Hill will be particularly visible for some distance, causing the natural view of the village and its distinctiveness as a rural area to be compromised.

Site selection – land between Colethorpe Lane and Church Road (by the school)

Parishioners' preferred area for development, was excluded from the short-list of sites, when the Parish Council voted on site selection in October 2022. The results of the Parish Council's own 2020 Neighbourhood Plan Questionnaire, shows a village majority of 54.7% voted for development in the part of Barrow between Colethorpe Lane and Church Road. (In fact, 81.9% of responders voted for areas of the village other than Barrow Hill.)

Some of the advantages of developing in the Colethorpe Lane/Church Road area are that the developer has offered to gift one hectare of land, to the school, to use if they require it and as they see fit. (170 extra homes will put pressure on the school to support children in the catchment area.) The site will have less of an impact on traffic movements through the village as vehicles are likely to travel towards the A14 and the site is adjacent to the school so reducing the number of cars through the village at the time of school runs.

Site selection – Bury Road

The ranking of the Bury Road site in AECOM's Strategic Environmental Assessment, with reference to the Historic Environment is based on errors. Contrary to this report, the Bury Road site has no impact on The Weeping Willow Public House or Barrow House and in fact, a new build has recently received planning approval and is currently under construction, right next door to the Weeping Willow pub.

The Neighbourhood Plan contains multiple references to the issue of coalescence between Barrow and Burthorpe, when they are already in close proximity, In addition, the Bury Road site plan shows that there is a substantial green, open space incorporating ponds for a sustainable drainage system at the north-east of the site.

In the Parish council meeting dated 18/10/22, the minutes recorded that, "Cllr Kronbergs spoke in favour of the Bury Road option. He gave the following reasons:

- In the assessment carried out by the Parish Council's own independent consultants, AECOM, this option had come out first, ... Judged against the five criteria of biodiversity and geodiversity; climate change; landscape; historic environment; and land, soil and water resources, it scored 28.5 points ... The Barrow Hill option had come third, some way behind, on 23.0 points.
 - It did not extend the village envelope, as would the Barrow Hill option
-

- It had been said that it threatened coalescence with Burthorpe, but he did not agree, as the easternmost edge of the site fell just west of Sharpes Hill, whereas there was already housing running further eastwards on the north side of Bury Road.”

I urge the Parish Council to reconsider its Neighbourhood Plan with a more evidence-based regarding site and community-focused approach, taking into account the concerns raised above to preserve the integrity and safety of our village.

132

1. The increase in traffic through the village. With 170 homes being built at the other end of the village to all the main routes in and out (the a14). Other suggested sites would have a much smaller impact on traffic in the village. The road is already struggling to cope.

2. The Parish Council council 2020 neighbourhood plan questionnaire had a majority vote of building the other end of the village. And the majority voted for other sites to the one you are continuing with. Why have you ignored that vote? And why are you ignoring residents views?

133

To Barrow Parish Council

The Parish Council is one part of our form of Government in England. It has certain responsibilities within the limits of its powers and the area it has partial control over. These principally include security for its community, ensuring safety where it is within its control, promoting a healthy and active lifestyle for its community, safeguarding and improving where possible the environment and seeking to improve the quality of life for its community. All these are in part limited by the powers the Parish has and the limitations on the area it has any governance over.

The Barrow cum Denham PC is failing in these regards. National government seeks to, and further has a legal obligation to, achieve Net Zero Carbon emissions by 2050, whilst Barrow Cum Denham happily seeks to promote the most carbon emissions for any development scheme by promoting one furthest from the main point of access to and egress from the village. The scheme it favours is the furthest of all proposed schemes from the Village School and would thereby promote the most vehicle movements to and from the village school. We have petrol and diesel cars being produced and sold new until 2035 and many families will run older cars for short local journeys so such vehicles will be around in reasonable measure until probably 2060 or thereabouts. Even when all cars are electric other vehicles will not all be and even electric cars can give rise to CO2 and other pollutants although probably not so much at the location of use but for electricity generation and/or for items of maintenance (such as brake linings, tyres etc).

To seek to minimise the negative aspects on the environment and on Global Warming due to essential development the Parish should not just sit back and react to incoming proposals by greedy land owners but should have assessed the least damaging locations for such development and approached land owners where the impacts on the village and on the wider environment and globally on global warming are minimised.

Many villagers in earlier considerations of where development should go have expressed the view it should be to the north of the Village. This would place development closer to the main point of entry and exit (the A14), place development near to the school to enable short walking trips to and from school and avoid a significant increase in traffic through the main village street.

It is time for the PC to think again. For its Consultants either they were given the wrong brief or they have been irresponsible and negligent in not looking seriously at the extra Global Warming and transport related issues and deteriorating environment on and along the main street from the development as proposed.

Barrow Hill is relatively narrow facility and suffers from only having one equally very narrow footway. It certainly does not meet current standards of pedestrian provision and cannot accommodate a dual child's buggy or a normal pram and someone walking in the opposite direction. Thus, pedestrians are forced to step into the road, an entirely unreasonable position in which to seek to add significantly to the pedestrian traffic and add further traffic due to a major development. In its NP report the Parish refers to "encourage measures to improve the wider safety of the roads and footways" (Page 85 of the NP Report), yet the plan goes forward with proposals for a further 170 homes that will require this unsatisfactory footway with out any requirement on anyone to fund the necessary improvements, which would alter the highway and footway to provide the safe pedestrian movements essential for another major development of family housing.

The proposals would add significantly to traffic on the main village street which is not suitable for more traffic and frequently has serious flooding causing large puddles (sometimes extending right across the road – side to side). These result in pedestrians being soaked by passing traffic, including large 6 axle lorries that like cars, but more so, spray dirty water everywhere across the adjacent footway.

Page 89 of the same Report refers clearly to the NP reflecting the "vision and aspirations of the local community". This is far from the truth (81.9% of responders in the Parish Council's own 2020 Neighbourhood Plan Questionnaire voted for sites other than Barrow Hill) and as the most recent previous surveys showed that the majority of those responding favoured development on the northern edge of the village. This is probably for the fairly obvious reason that such development is closer to the main point of entry, from the A14, thus reducing traffic journey distances and CO2 emissions as well as avoiding that extra traffic going right through the village on the main village street, which the community know has its own problems.

So how is it that you appear to completely ignore the earlier consultation surveys, that you choose to completely ignore the Policy laid down in law by your National Government , and choose instead to load traffic through an unsuitable main village street and decide on a solution that just adds tons of CO2 to the atmosphere when other less polluting options have been preferred by your pretty intelligent Parish Community?

134

Are you sure you've got this right ?

135

The plan is very much aligned to a typical local plan produced by the district council lead by national planning policy. What is really important is specific policies that are set that meet the uniqueness of the parish with the aim of shaping future development and ensuring that the infrastructure is aligned (and planned for) to the neighbourhood plan.

The overall key objectives are fairly typical and the majority will support as there is nothing really contentious. There does need to be a sense of realism when it comes to Active Transport, the village will never have an adequate public transport network to support it and Higham station is never likely to be re-opened, so car movements will continue to rise (even with the increase in home working). Many set up home in the village as its much cheaper than Cambridge (and nicer) but having the benefit of a good road network and you can be in Cambridge City within 30 minutes. Therefore, the only real impact the neighbourhood plan can have is more emphasis on real improvement to local road (widths, junctions, footpath and cycleways). Developers will do the bare minimum as this can be seen by the recent cycle path to nowhere on latest Hopkins Homes site on Barrow Hill. Stronger words than encouragement to invest is needed and there needs to a long term strategic plan as the village grows rather the piecemeal approach to date.

After the 50+ pages of introduction and scene setting you get to the policies.

These are generally very woolly with weak words like "may", "does not restrict" "carefully designed" and enough loopholes for shrewd developers to bend, twist and use their PR machines to bamboozle many with glossy brochures, tick box consultations, and promises of infrastructure to support. Lets not kid the residents that the NP will not make one iota of difference. Many residents do not want development and if they do support it, it will be a case of NIMBY but its ok down the road! I do support measured development but the recent history of the last 5 years seem to has not seen the infrastructure developed - where has all the S106 money and developers contributions been spent?

I am amazed that BCD2 has been put forward based on the previous consultations - a low turn out and probably a low turn out on this consultation just shows how apathetic people are when it comes to local democracy. No doubt many will put forward other sites due to transport matters, loss of views etc. Generally Land at Barrow Hill proposal is not a bad one given the emphasis on community facilities. It does not address the infrastructure around roads/safety. If a smaller number of sites are put forward like Bury Road or Colethorpe Lane - ultimately the opportunity for enhanced community provision and facilities will be lost - the only real benefit of those sites is the spreading of vehicle movements through the centre of the village.

If Barrow wanted to have a stronger focus on affordable homes you would push for an increase on the 30% minimum. The mix of fewer 4 bedroom homes would support this, but I recognise its all about creating a cohesive balanced neighbourhood.

BCD5 - Quality Housing design is very subjective. I do support the housing mix with the slant towards increasing 2 and 3 bedroom homes, Flats/maisonettes should also be considered. Homes for the older generation and assisted living should also feature.

Barrow could do more about protecting the aesthetics of the street scene, the development on The Green in 2013 (does this) but the large 3 storey houses opposite the war memorial do not. Many of the styles in Grove Park with mock pillars of grandeur mini mansions do not. It is a shame that there is no conservation area in the village but this opportunity has passed years ago.

BCD7 - we are fortunate to have many local businesses and trades (many of which are home based). The plan does not really address retail space, this has organically grown and these are not located in the best places for a growing village, e.g. Matts Stores - well documented issues around accessibility standards and parking and the Doctors was once a landmark building but despite many extensions its current location is not sustainable. It is a real challenge to locate these important community facilities - need to well place for walking (but in real life many drive to/on the way to somewhere else).

BC12 - Have already mentioned the reliance on the car and this is not going away. Developers will always conform to bare minimum and national policies and standards. The NP could be stronger around the impact on the street scene by not supporting the stance of minimum on plot parking, as this just leads to parking on pavements and the frustration this causes for residents walking, pushchairs and mobility scooters. Nothing in the plan around EV charging infrastructure beyond the requirement for new developments.

Overall its a pretty document, lots of words and for many this will be incomprehensible to understand. Fair play to all the work that has gone into it, I do hope that it does help to shape Barrow as a key service centre, with additional houses that are a bit more in keeping and that the infrastructure does develop too.

Development cannot be stopped all we can do is try and shape it, but be realistic and honest about it too.

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I am against the proposed development site in the Neighbourhood Plan (Barrow Hill) for the following reasons, which are in common with the majority of residence in Barrow.

1. It has been estimated that it will create an increase in traffic, around an extra 300 vehicle movements per day through the entire length of the village which could have a significant impact on the local traffic flow and the overall quality of life for residents in the area. This could lead to issues such as increased congestion, noise and potential safety concerns. The Bury Road and Calthorpe Lane sites would not have the same impact. Calthorpe Lane housing would likely go directly to the A14 for the majority of journeys, completely avoiding the centre of the village and children could be dropped off to school on foot.

2. Barrow Hill is a country road with limited width and a narrow pavement. It is not designed to accommodate heavy traffic flows. The safety of pedestrians is a significant concern in such situations.
i should add that it is already in poor condition.

3. There is a discrepancy between the results of the 2020 Neighbourhood Plan Questionnaire conducted by the Parish Council and the decisions made in the Parish Council's Neighbourhood Plan. The results of the Parish Council's own 2020 Neighbourhood Plan Questionnaire, shows there was a majority of 54.7% of village residents who voted for development in the part of Barrow by the school. In fact, 81.9% of responders preferred sites other than Barrow Hill for development. The Parish Council's Neighbourhood Plan is therefore taking no notice of the wishes of the Parishioners that were indicated in the Parish Council's 2020 Neighbourhood Plan Questionnaire.

4. At 13.6 Ha, the preferred site is unnecessarily large to accommodate the housing requirement of 170 houses for Barrow. 13.6 hectares could house 400+ houses at 30 dwellings per hectare. In choosing a different site to West Suffolk council, the Parish Council has also put the village at risk of receiving 170 additional houses on a different site. This puts us at risk of overdevelopment. Overdevelopment can lead to various issues, including strain on infrastructure, traffic congestion, noise and pollution. The Parish Council has failed to give due consideration to the protection of green space and the environment, contrary to parishioners' views shown in the Parish Council's own Report on Responses to the 2020 Parish Questionnaire (an appendix to the Neighbourhood Plan).

5. The Parish Council have not followed due process in that they have ignored the results of AECOM's site appraisal, which is designed to assess the suitability of identified sites to understand which, if any, are appropriate for allocation in the Neighbourhood Plan. The site appraisal process is an essential step in the development of a Neighbourhood Plan to ensure that sites selected for development align with broader planning policies and regulations. The site summary evaluation scoring taken from the Parish Council's own commissioned report from Aecom, was minuted in the Parish Council meeting dated 25/8/22 and shows site B (Bury Road) to have the highest score and site C (East & West of Barrow Hill & South of Barrow Forge) in 3rd place. Following an exchange of Councillors' views, minuted in the same meeting, and in the 'Extraordinary

Meeting' dated 18/10/22, the Parish Council voted in favour of site C, a vote which doesn't seem to be evidence-based but follows a discussion of personal opinions and preferences.

6. There are no firm or legally-binding commitments for provision of sports and recreation facilities, etc. It is therefore irrational for the Parish Council to select a site which is less sustainable than others based on non-binding indications from landowners to provide such facilities.

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I object to the Parish Council's proposed Neighbourhood Plan for the following reasons:

Sustainability

- The Barrow Hill site in the Neighbourhood Plan (NP) will lead to an unbalanced elongated village shape. There is no public transport running from the southern end of the village to the north.
- This choice of site would therefore result in an increase of approximately 300 plus car journeys per day running from the site through the whole length of the village for people to access the school or services in Newmarket or Bury via the A14. This will cause increased carbon emissions resulting in increased air and noise pollution, detracting from the amenity of village life. This would be directly in conflict with the national strategy to maximise sustainability and minimise private transport.

Community integration

- The disproportionate amount of new housing to the south of the village will cause polarisation, isolation, and lack of integration of the new residents with the rest of the village, resulting in a divisive 'new' and 'old' Barrow social dynamic. A more centralised site such as Bury Road would allow easy integration of new residents into village community life and events with pedestrian access to the shops, pubs and school.
 - The Barrow Hill site is much larger than required to accommodate the West Suffolk allocation of 170 houses for Barrow, so there is a significant risk of additional housing as 13.6 Hectares at 30 dwellings per Hectare (national minimum density target) would accommodate 400+ houses, if the care home, commercial and other extra buildings are not taken up. There has been no uptake for the commercial site in the Woodland Rise development since 2019, and care homes all over the country are closing because of difficulty in recruiting staff, so this is a very real possibility.
-

Safety and Biodiversity

- Barrow Hill is narrow with a pavement only on one side, causing cars to be driven dangerously close to pedestrians and cyclists. A huge increase in the number of cars travelling through the village, inevitable with an increase of 170 houses at Barrow Hill, would decrease both pedestrian and wildlife safety. The Barrow ducks are an important part of village life, and there are far too many killed on the road currently. This is directly in conflict with a biodiversity and safety policy.
- The ancient Wilsummer Woods and County Wildlife Site would be in close proximity to the new housing. This will affect the amenity of the walk towards the wood which currently is a very popular one with all in the village. There would also be loss of biodiversity with disturbance to the natural environment.

Surface and Foul Drainage

- Residents on the Woodland Rise development and Barrow Hill continue to experience recurrent problems with the foul drainage. The infrastructure is not adequate for the current housing demands and would not practically support further development of 170 houses.
- The surface water drainage along Barrow Hill is an old system of gullies which are proving to be inadequate, as the road regularly has large areas of standing water after moderate rainfall. There is no provision within the NP to correct the surface and foul drainage issues before increasing demand on the systems with increased housing.

Potential Environmental Pollution

- The outbuildings on the land south of Beale Road which are earmarked for development in the proposed NP, have the appearance of large asbestos curved concrete roofs. If this is the case, demolition may cause potential airborne asbestos fibres and environmental contamination to the soil for extended periods. These may cause health risks to village residents and wildlife. Mitigations may allow safe working for the demolition crew, but the toxic environmental pollution may still pose an ongoing risk for residents. Has this been considered when selecting a site to build 170 new homes?

The process

- In the assessment carried out by the Parish Council's independent consultants, AECOM, the Bury Rd site came out first. Judged against the five criteria of biodiversity and geodiversity; climate change; landscape; historic environment; and land, soil, and water resources, it scored 28.5
-

points. The Barrow Hill option came third with 23.0 points. The parishioners, in an early questionnaire, voted for a more northerly site. The Parish Council then voted in favour of the Barrow Hill site. The choice of the Barrow Hill site may not be supported by evidence.

- It is important to have transparency in the due process to ensure no conflict of interest. I understand that the consultants that have been engaged to draft the Neighbourhood Plan by the PC are the same consultants as used by Barrow Hill landowners/Pigeon. Could there be potential for a conflict of interest here?

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I strongly object to the proposed Neighbourhood Plan for the following reasons:

1. Environmental Sustainability:

The intended development at Barrow Hill will lead to an unbalanced elongated village shape, causing an approximate increase of over 300 car journeys per day. This surge in traffic will result in heightened carbon emissions, amplified air and noise pollution, and an overall decline in the village's quality of life, directly conflicting with the national strategy to promote sustainability and reduce private transport.

2. Social Cohesion:

The disproportionate concentration of new housing in the southern part of the village is anticipated to create a divisive 'new' and 'old' Barrow social dynamic, inhibiting the integration of new residents into the existing community. A more centralised site would allow for easier integration of new residents into village life and facilitate pedestrian access to key amenities, fostering a more cohesive community.

3. Safety:

The narrow structure of Barrow Hill with a single-sided pavement, if exacerbated by the potential influx of traffic resulting from the proposed 170 houses, would pose a danger to pedestrian and cyclist safety. This is particularly relevant to those with disabilities and parents with young children.

4. Ecological Diversity:

The proximity of the ancient Wilsummer Woods and County Wildlife Site to the new housing poses a threat to the amenity and biodiversity of the area, potentially disturbing the natural environment and its inhabitants. Many walkers enjoy the walk towards the wood which would become a route through a housing development.

5. Surface and Sewage Drainage:

The persisting issues with the foul drainage system in the Woodland Rise development and Barrow Hill raise concerns about the infrastructure's ability to support the existing housing demands, let alone any additional strain that 170 new houses would bring. Furthermore, the inadequacy of the current surface water drainage system along Barrow Hill points to the need for necessary provisions before considering further housing development.

6. Potential Environmental Pollution:

The potential presence of asbestos in the outbuildings south of Beale Road, identified for development in the proposed Neighbourhood Plan, could pose a significant risk of environmental contamination during the demolition process, which may have severe health implications for residents and wildlife. The long-term effects of such pollution on the community and ecosystem must be carefully considered.

7. The Procedure:

It is imperative that the planning process maintains transparency and integrity to serve the best interests of the community while upholding environmental sustainability and safety standards.

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1. I am concerned re the provision of SUDS only being applied to the areas of new development. I think that the village plan should also incorporate new thinking on SUDS along the Street and the Bury Road as a minimum.
 2. I strongly disagree with the Active transport and access BCD12.4 that the plan should minimise provision of on plot parking etc. I think that Walking and Cycling within the village should be actively encouraged with the provision of joined up well maintained cycle and footpaths plus a crossing by the new postoffice location at Matts stores. However the plan should be realistic that the majority of people will use their cars to leave the village and therefore off street parking with electric charging points should be incorporated for each new dwelling to avoid roads just becoming a car park.
 3. I agree that there should be provision of 2, and 3 bedroom homes and one story homes in keeping with a village feel of mixed occupancy. care should be given as to how they are finished ie a mix of roofing types, walls in brick, or timber or render to replicate an evolving village not all the same 3 or 4 styles replicated again and again with just a different colour brick as a lot of new developments are. it seems that time is spent deciding where to build but not enough time spent on what to build and what finish should be used to blend in with the existing area and its traditions.
 4. all the 'extras' ie landscaping, paths, recreation areas etc should be constructed at the same time as the housing not left until months or years later when the money has run out and the developers have moved on.
-

Environment and carbon emissions:

The NP development at Barrow Hill will create a long, narrow village with more traffic through the village, leading to increased carbon emissions, air and noise pollution, and a lower quality of life for everyone. This goes against the national strategy to reduce our reliance on cars.

As a person with a disability that prevents me from driving I have experienced difficulty in accessing village amenities because of a lack of public transport from the south end of the village. Reluctantly, as I do not wish to be adding to the carbon footprint, this makes me reliant on other people to drive me which restricts my independence. The proposed development site is not served by public transport, which would make it difficult for people with disabilities to get around without a car.

Social cohesion:

The concentration of new housing in the southern part of the village will create a divide between "new" and "old" Barrow, making it harder for new residents to integrate into the community. Please consider a more central site so that those who are disabled, elderly, or parents with young children can easily access village life and integrate into the current established community.

Safety:

The narrow road with a single-sided pavement at Barrow Hill will become a danger for pedestrians and cyclists, especially those with disabilities, and also parents with young children pushing buggies. More traffic from the new development will make this threat even worse.

Ecological diversity:

The ancient Wilsummer Woods and County Wildlife Site are close to the proposed housing development. Walking to these woods and seeing the wildlife gives me and many others peace of mind and is important for mental health and well being. If this development goes ahead I would be walking through a housing estate.

Ducks

The Barrow Ducks and their ponds are a really unique feature of the village. Many Ducks die on the road already. More cars will make visiting the ponds more dangerous for myself, young adults, and children. And of course, more Barrow Ducks will die!

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I have just emailed the below to the Parish Council. Please refer to the email. Copied here to record that it is going through the portal.
Response to Regulation 14 Public Consultation Barrow-cum-Denham Parish Council Neighbourhood Plan:

Thank you for the opportunity to comment on the above. Please accept the below as a strong objection to the proposed Barrow-cum-Denham Parish Council's Neighbourhood Plan. It may be subject to amendments or further additions at any future consultations held by West Suffolk Council and the Inspectorate.

Site selection - Barrow Hill

1. The Parish Council (PC) choice of site at Barrow Hill doesn't appear to be evidence-based. Site summary evaluation scoring taken from the PC's own commissioned report from Aecom, was recorded in the minutes from the PC meeting dated 25/8/22 and shows site B (Bury Road) to have the highest score at 28.5 and site C (East & West of Barrow Hill & South of Barrow Forge) in 3rd place, with a score of 23. Following an exchange of Councillors' views, in the same meeting, and in the 'Extraordinary Meeting' dated 18/10/22, the PC voted in favour of site C, a vote which I believe doesn't seem to be evidence-based but follows a discussion of personal opinions and preferences.
2. Colethorpe Lane, parishioners' preferred area, by a vote of 54.7% in the PC's own 2020 Parishioners' Questionnaire, a leading document for the Neighbourhood Plan (NP), seems to have been excluded completely from the PC short-list of sites.
3. West Suffolk Council's (WSC) housing allocation for Barrow is for 170 dwellings, nothing more. The provision of a care home, commercial and sports facilities at Barrow Hill, included in the NP, do not appear to be evidence-based. Parishioners did not express a desire for any of these in the PC's own 2020 Parishioners' Questionnaire (a supporting document for the NP). So why cover much more of Barrow's countryside with concrete than is necessary.
4. As the NP site of preference at Barrow Hill, is unnecessarily large to accommodate the WSC allocation of 170 houses for Barrow, I believe that there is a risk of additional housing (or other buildings, or being left as wasteland), as 13.6 Hectares at 30 dwellings per Hectare (national minimum density target) would accommodate 400+ houses, if the care home, commercial and sports facilities are not taken up. There has been no uptake for the commercial site in the Woodland Rise development since 2019, and care homes all over the country are closing because of difficulty in recruiting staff, so this is a very real possibility.
5. By selecting a site that is different to that in the WSC emerging Local Plan (LP), there seems to be a risk that the dwellings at Barrow Hill will be built in addition to those in the WSC emerging LP, doubling the quantity of houses ($170 \times 2 = 340$), plus a care home, commercial and extensive sporting facilities, which if not taken up (as above) will mean $408 + 170$ houses = 578.
6. Around an extra 300 vehicle movements per day which affect the entire length of the village and impact heavily on Barrow Hill, will be created

from the housing allocation of 170 dwellings alone. If the NP proposed care home, commercial buildings and other facilities are taken into consideration, this will create many more daily vehicle movements. This would be directly in conflict with the national strategy to maximise sustainability and minimise private transport. Whereas Colethorpe Lane is easily accessible from the A14 and the Bury Road site from Bury St Edmunds.

7. Construction traffic will likewise have to ply backwards and forwards along Barrow Hill and The Street to build a development at Barrow Hill.

8. Barrow Hill is a country road and not wide enough to be used as a main road. It has one narrow pavement, on one side only resulting in vehicles being dangerously close to pedestrians. The proposed increase in traffic will exacerbate this further.

9. Cycle paths identified in the plan don't go anywhere, and there is no opportunity for future expansion along Barrow Hill as the road isn't wide enough.

10. The Street, in Barrow and Barrow Hill are prone to large areas of standing water, causing cars to drive extremely slowly through very deep water and creating high water movement at the sides of the road, drenching pedestrians. The village, like most other villages, has ancient drainage systems of gullies at the side of the road, which were not intended to support the increase in development currently asked of them. (Described more fully in the 2 objections sent separately 23/10/23, for which more photos and videos are available to evidence this.)

11. Many residents on the Woodland Rise development and Barrow Hill seem to be experiencing problems with the foul drainage system. It seems that the system was installed years ago and not intended for the number of houses it is being asked to support nowadays. Again, no provision has been put in place to update these systems and correct this prior to further building and increasing demand on it. (Described more fully in the 2 objections sent separately 23/10/23.)

12. There has been a disproportionate amount of new housing in the south of the village, and the proposed development, is again at Barrow Hill, causing polarisation, isolation, and lack of integration of the new residents with the rest of the village, resulting in a divisive 'new' and 'old' Barrow social dynamic, and Barrow Hill becoming a satellite area which would spoil the integrity of the village.

13. When driving into the village from Hargrave, the southern gateway to the village, I believe the proposed site at Barrow Hill will be particularly visible for some distance, and likewise when driving in from the east along Bury Road, causing the natural view of the village and its distinctiveness as a rural area to be compromised.

14. The outbuildings on the land south of Beale Road which are earmarked for development in the proposed NP, have the appearance of large asbestos curved concrete roofs. If this is the case, demolition may cause potential airborne asbestos fibres and environmental contamination to the soil for extended periods. These may cause health risks to village residents and wildlife. Mitigations may allow safe working for the demolition crew, but the toxic environmental pollution may still pose an ongoing risk for residents. Has this been considered when selecting a site to build 170 new homes?

15. The ancient woods, 'Wilsummer Woods' and County Wildlife Site would be in much closer proximity to the proposed development and the building of new houses would permanently affect the surroundings in which this heritage asset is experienced, and as the proposed site is on a hill, sloping towards this area, will pose an increased risk to standing water and flooding, as it is already boggy in that area, this could affect this heritage area and the ancient trees and a loss of biodiversity and disturbance to the natural environment.

16. The Barrow ducks are an important part of village life, and there are far too many killed on the road currently. This is directly in conflict with a biodiversity and safety policy.

The process

17. The main purpose of the NP is so that any further development in the village is based on parishioners' preferences and views. The PC's own 2020 Parishioners' Questionnaire, a leading document for the NP, shows a village majority of 54.7% who voted in favour of development in the part of Barrow to the North of the village. However, the decision for the site choice was made after a discussion amongst Parish Councillors and based on their own views, (as referenced in the PC meeting minutes dated 25/8/22 and 18/10/22).

18. Barrow Hill is not the highest scoring site, as shown in the PC's own commissioned, AECOM report.

19. As such, the site choice is not evidence based (items 17 and 18 refer).

20. Some residents were surprised to find that only the Barrow Hill site has been included in the NP. It also seems to have created the impression that it is a 'fait accompli', especially with the amount of work that has been carried out so far, and the display at the public exhibition, and some feel that therefore, there is little point in raising objections.

21. A statement, from the PC meeting of 5/9/22, records that residents are “reminded that if the NP is voted down the village will be totally exposed”, which seems to give parishioners the impression that if they vote against the NP, the parish might be subject to large scale over-development.

22. The actual situation in September 2022 was that WSC had published a modest site allocation in their emerging LP for preferred housing sites at Denham Lane & Bury Road.

23. The planning consultants, Turley, who have been engaged to draft the NP and supporting Regulation 14 information, were also engaged by the Barrow Hill landowners and Pigeon for the land at Barrow Hill. It is important to have transparency and for due process to be followed, by engaging the same planning consultants, it isn't possible to have a separation of duties and could present a conflict of interests.

Site selection – land between Colethorpe Lane and Church Road (by the school)

24. Parishioners' preferred area for development, was excluded from the short-list of sites, when the PC voted on site selection in October 2022, as detailed in point 18 and 2.

25. The site between Colethorpe Lane and Church Road seems to have been rejected by the PC on the grounds that it doesn't adjoin the settlement boundary. However, it seems that it is within or adjacent to the bounds of the actual, physical settlement and that part of the site has already been allocated under the current LP and is therefore likely to change the current settlement boundary within the timeframe of the NP. It would seem, that the school itself, doesn't sit within the settlement boundary either, an anomaly that has existed for some years and which at some point will need to be addressed, and could have been done at the same time as this site.

26. In the PC meeting minutes dated 18/10/22, Cllr Holmes “stated that the impact from traffic movement would be less from the Bury Road site. However, he did not agree with either site [Barrow Hill or Bury Road] and had always backed the site at Church Road as it would reduce the traffic through the village and provide the school an opportunity for expansion. As this site was not being considered, Cllr Holmes stated he would abstain from voting on the site selection.”

27. A letter sent to the PC and read out during the meeting dated 17/7/23, questioned a PC response in the previous meeting, which referred to WSC's allocation of sites in their emerging LP for Barrow, when again the question was raised as to why the Colethorpe Lane/Church Road site wasn't being considered as part of the NP. The letter stated that, 'According to the relevant sections of the National Planning Policy Guidance: "Plan Making" and "Neighbourhood Planning" ... can allocate ... alternative sites to those in an emerging LP where it is supported by evidence to demonstrate need/local circumstances which differ from those identified in an emerging LP.'

28. In the PC meeting dated 4/9/23, it was said that WSC could not legally consider the Colethorpe Lane site, and that the local council have been approached many times, but it would seem, it is a matter for the PC to consider whether deferred in the LP or not.

29. Some of the advantages of developing in the Colethorpe Lane/Church Road area are:

I. The developer has offered to gift one hectare of land, to the school, to use if they require it and as they see fit. (The increase of 170 dwellings in the village, will put extra pressure on the school to support those children in the catchment area.)

II. The Colethorpe Lane/Church Road site is in a much more sustainable location and will have less of an impact on traffic movements through the village as vehicles are likely to travel towards the A14.

III. The site is adjacent to the school so reducing the number of cars through the village at the time of school runs, and yet still within a 10 minute, walk of other local amenities.

IV. There is potential for additional traffic calming to be introduced along Colethorpe Lane as part of the proposals, subject to agreement with the County Council.

Site selection – Bury Road

30. AECOM's Strategic Environmental Assessment, with reference to the Historic Environment at Bury Road seems to be based on errors which affects the site's ranking. Contrary to this report, the Bury Road site has no impact on The Weeping Willow Public House or Barrow House. In fact, a new build has recently received planning approval and is currently under construction, right next door to the Weeping Willow pub. In addition, the nature of Bury Road is already changed, as there are many newer builds all along Bury Road and adjoining the 2 above properties.

31. The NP contains multiple references to the issue of coalescence between Barrow and Burthorpe, when they are already in very close

proximity, and in the PC meeting minutes dated 25/8/22, it was recorded that, 'Cllr Kronbergs disagreed that coalescence with Burthorpe would be an issue as there are houses further down Bury Road already, past Burthorpe.' In addition, the Bury Road site plan shows that there is a substantial green, open space incorporating ponds for a sustainable drainage system at the north-east of the site.

32. In the PC meeting dated 18/10/22, the minutes recorded that, "Cllr Kronbergs spoke in favour of the Bury Road option and gave the following reasons:

"In the assessment carried out by the PC's own independent consultants, AECOM, this option had come out first, ... Judged against the five criteria of biodiversity and geodiversity; climate change; landscape; historic environment; and land, soil and water resources, it scored 28.5 points ... The Barrow Hill option had come third, some way behind, on 23.0 points.

It had the advantage of accommodating all the new homes on just one site, as opposed to spreading them over three, as the Barrow Hill option would. This would better concentrate amenities.

It required just one new access road, as opposed to two for Barrow Hill, on opposite sides of the road.

It did not extend the village envelope, as would the Barrow Hill option.

It had been said that it threatened coalescence with Burthorpe, but he did not agree, as the easternmost edge of the site fell just west of Sharpes Hill, whereas there was already housing running further eastwards on the north side of Bury Road."

Site selection – Denham Lane

33. The PC rejection of the Denham Lane site, on the grounds that it would 'close the gap between Barrow and Denham' is irrational. The Denham Lane site being a small site (0.66Ha), suitable for around 20 dwellings, its shape means that erosion of any green space between Denham and Barrow is minimal. And the site was selected by WSC, along with Bury Road, a site selection which is evidence-based and established on the highest evaluation ranking site.

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Dear Sir/Madam,

Please note that we have submitted a PDF version of this representation which contains relevant images and Appendices via email to the parish Clerk, Rachel Chilton at barrowcumdenhampc@gmail.com and Cllr Ralph Rawlings at ralph.rawlings@barrowcumdenhampc.com

Cover email:

Please find below our written representation prepared by Stantec on behalf of Bloor Homes in respect of the Regulation 14 Pre-Consultation of the draft Barrow-cum-Denham Neighbourhood Plan.

This representation is intended to assist the Neighbourhood Plan team in the production of the Neighbourhood Plan and reflects discussions that have been undertaken between Bloor Homes and the Parish Council as well as the outcomes of Public Engagement undertaken by Bloor Homes with residents of Barrow.

Bloor Homes site, Land off Bury Road, Barrow is located to the north-eastern edge of the village, adjacent to the existing settlement boundary for Barrow and to the west of Burthorpe. Bloor Homes would like to emphasise that Land off Bury Road forms part of the allocation in the emerging West Suffolk Local Plan, (3.1. Barrow) and the settlement boundary is due to be extended to encompass the Bury Road site, and therefore the Neighbourhood Plan is inconsistent with the emerging Local Plan and does not allocate the Bury Road site.

The attached representation establishes that the evidence base clearly demonstrates that the Bury Road site is the preferred option for an allocation and development as opposed to the Barrow Hill site. Secondly, it demonstrates the risks with the Neighbourhood Plan preparation process. The representation also draws attention on how the Barrow Hill site proposal has changed and how this impacts on its assessment and allocation. Finally, the representation sets out Bloor Homes continued engagement process with the local residents and that the feedback received from this identifies the Bury Road site as the preferred option for allocation.

In conclusion:

- Bloor Homes object to the Neighbourhood Plan based on insufficient evidence as well as inconsistency with the Neighbourhood Plans own evidence base and emerging Local Plan in terms of site allocation.
 - Bloor Homes emphasise that the Neighbourhood Plan making process is flawed and lacks credibility, viability and transparency; and the selection of an allocation of the Barrow Hill site does not reflect the evidence base.
 - Bloor Homes object to the allocation of Barrow Hill and note that the stated capacity of 170 dwellings on site is much lower than the actual capacity, 217.8 dwellings, calculated with the location appropriate density (30d/ha) provided by SOAR; therefore the representation of the Barrow Hill site is misleading.
 - Bloor Homes emphasise the fact that the amendments to the Barrow Hill site allocation has removed the significant public benefit which was the main reason why the Parish Council considered it to be the preferred site for allocation.
 - Bloor Homes demonstrated continuous and transparent engagement with the local residents and addressed their concerns, comments and
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suggestions.

- Bloor Homes would be happy to discuss any of the content of this response with the Neighbourhood Plan team in order to allow the Plan to move forward in a coherent and effective manner.

Submission document (TEXT ONLY)

1 Introduction

1.1.1 This representation has been prepared by Stantec on behalf of Bloor Homes in respect of the Regulation 14 Pre-Consultation of the draft Barrow-cum-Denham Neighbourhood Plan. This representation is intended to assist the Neighbourhood Plan team in the production of the Neighbourhood Plan and reflects discussions that have been undertaken between Bloor Homes and the Parish Council as well as the outcomes of Public Engagement undertaken by Bloor Homes with residents of Barrow.

1.1.2 Barrow is located approximately 7 miles west of Bury St Edmunds, and south of the A14. Within the emerging West Suffolk Local Plan (WSLP) (Reg 18) the village is categorised as a Key Service Centre, which is designated to take 170 dwellings over the plan period to 2036 on two sites: Land off Bury Road (Site 3.01a) for 150 dwellings, and land south of Denham Lane (Site 3.01b) for 20 dwellings.

1.1.3 Bloor Homes site, Land off Bury Road, Barrow is located to the north-eastern edge of the village, adjacent to the existing settlement boundary for Barrow and to the west of Burthorpe. It should be noted that as part of the allocation in the emerging WSLP, (3.1. Barrow) the settlement boundary is due to be extended to encompass the Bury Road site. Please see draft site allocation in Appendix 1.

1.1.4 In light of the above it should be noted that the Neighbourhood Plan is inconsistent with the emerging Local Plan and does not allocate the Bury Road site.

1.1.5 Bloor Homes object to the Neighbourhood Plan based on the inadequacies of the evidence base, the Neighbourhood Plan process and inconsistency with the evidence base and emerging Local Plan in terms of site allocation. Furthermore, Bloor Homes object to the allocation of Barrow Hill. Bloor Homes would be happy to discuss any of the content of this response with the Neighbourhood Plan team in order to allow the Plan to move forward in a coherent and effective manner.

1.1.6 This representation is structured as follows:

- Section 2: Will establish that the evidence base clearly demonstrates that the Bury Road site is the preferred option for allocation and development as opposed to the Barrow Hill site.
 - Section 3: Demonstrates the flawed nature of the Neighbourhood Plan preparation process. The representation also draws attention on how the Barrow Hill site proposal has changed and the flawed judgment of its assessment and allocation, as well as its inaccurate representation in
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terms of capacity.

- Section 4: Finally, the representation sets out Bloor Homes continued engagement process with the local residents and that the feedback received from this identifies the Bury Road site as the preferred option for allocation.

2 Evidence Base

2.1.1 In this section each of the Neighbourhood Plan evidence base documents have been assessed. Based on this assessment it is demonstrated that the Land off Bury Road is considered to be a more sustainable, deliverable and appropriate allocation compared to the Barrow Hill site currently allocated by draft Policy BCD2 in the Neighbourhood Plan.

2.1.2 For ease of reference the table summarises the different Site references throughout the evidence base documents.

Site Name Neighbourhood Plan Call for Sites West Suffolk Issues and Options Site Submission Review 2021

Land east of Barrow Hill BD6 WS010 (A)

Land south of Barrow Forge BD8 Part of WS228A

Land west of Barrow Hill BD12 WS1078 & part of WS228(A)

Land south of Bury Road BD13 WS011

(Land either side of Barrow Hill) BD11 WS228(A)

2.1.3 For completeness we note that the allocated Barrow Hill site is formed of the combination of sites BD6, BD8 and BD12.

2.2 Site Options and Assessment Report (September 2021 - AECOM)

2.2.1 A Neighbourhood Plan Call for Sites was undertaken in October 2020 which identified thirteen sites for development consideration in the Neighbourhood Plan to meet housing need. The Site Options and Assessment Report ('SOAR') was prepared by AECOM in 2021 and provides an assessment of all sites for development, taking into account Local Plan policy and national planning criteria to establish which, if any, of the sites are suitable for development. The assessment of sites was informed by a review of their policy constraints, the evidence base and site visits. The key findings of the assessment is summarised below.

Accessibility

2.2.2 The SOAR concluded that the Bury Road site (BD13) is 'favourably' located to village services and facilities, whilst each parcel of the Barrow Hill site (BD6, BD8 and BD12) were considered to be only 'moderately' located.

Barrow Hill site (Bd6, BD8 and BD12)

2.2.3 From BD8 there is currently no footpath linking the site to the village and its facilities. Similarly, BD12 is not connected to the village by footpath and consultation with the Highways Authority is required to assess potential to link the site by footpath to the village. BD6 also not connected to the village by existing footpath.

Bury Road site (BD13)

2.2.4 In comparison our client's site, Bury Road site (BD13), has the benefit of an existing footpath along the northern side of Bury Road which the development can easily connect with and has the potential to link the site through multiple access points to the village centre including by footpath to The Weeping Willow Pub which backs onto the site and Lion Green.

Summary

2.2.5 In conclusion, in terms of accessibility the Bury Road site (BD13) performs much better than the draft allocated Barrow Hill site, as it already has existing footpath to the village centre along Bury Road as well as the potential for multiple points where it could connect to the village via Lion Green and the Weeping Willow Pub.

Relation to the village

Barrow Hill site (BD6, BD8 and BD12)

2.2.6 BD6 was considered to be well related to the built form and settlement pattern of the village, however, development of the site would require a defensible boundary to the east, and further assessment would be required to understand other environmental issues such as archaeological finding and recreational pressure.

2.2.7 With regards to site BD8 the SOAR concluded that development of the site has potential to place recreational pressures on the County Wildlife Site, and due to the existing small size of the settlement 'major growth has the potential to create a ribbon of development away from the existing centre'. It should be also noted that the St. Edmundsbury LDF Opportunities and Constraints (2012) document identifies approximately the whole extent of the site (BD8) as part of a landscape buffer to prevent further growth to the south of Barrow.

2.2.8 Furthermore, development of the site (BD8) would elongate the village to the south, and it would require open space and screening to the east to mitigate against recreational pressures on the nearby County Wildlife Site.

2.2.9 Although development of the BD12 site has potential to continue the built form and settlement pattern, the development would elongate the village to the south 'potentially creating ribbon development away from the centre, whereby development should be sited as close as possible to the existing facilities within the settlement' (as identified in the Opportunities and Constraints Rural Vision 2031 supporting document (St. Edmundsbury LDF Opportunities and Constraints (2012))). Whilst the site is potentially suitable for allocation it should only be considered if no other more sustainable sites be found suitable.

Bury Road site (BD13)

2.2.10 It is acknowledged that growth of Barrow 'is restricted by the potential threat from coalescence with Burthorpe' and therefore a distinctive break in development should be retained. To avoid further coalescence between Barrow and Burnthorpe, the SOAR notes that there is potential to reduce the BD13 site area to the western half of the site in line with the built form of the Dale Tree Road residential area to the north, and the site is potentially suitable for allocation consideration on a reduced site area. Furthermore, Cllr Kronbergs 'disagreed that

coalescence with Burthorpe would be an issue as there are houses further down Bury Road already, past Burthorpe.’ during the Parish meeting held on 25 August 2022 (Appendix 3).

2.2.11 Bloor Homes design team has taken this on board and prepared a masterplan layout which sets back proposed development from the eastern part of the boundary with Bury Road and provide a Community Nature Park with multi-purpose landscaped SuDS. As such, the proposed layout retains the visual separation between Barrow and Burnthorpe and avoids any coalescence between the two settlements.

Summary

2.2.12 In summary, BD8 and BD12 has the potential to elongate the settlement and ‘create a ribbon of development away from the existing centre’; and BD6 requires further assessment to understand environmental issues such as archaeological findings and recreational pressure.

2.2.13 Whilst the close vicinity of Burnthorpe to the Bury Road site (BD13) is potentially restricting, the proposed layout addresses the concerns raised and with not proposing built up from in the northeast part of the site, sufficient separation is achieved.

SOAR Summary

2.2.14 The SOAR summary shows that Sites BD6, BD8, BD12 and part of BD13 were found to be potentially suitable for allocation in the Neighbourhood Plan subject to issues such as access, landscape buffer, open space mitigation, screening and risk of coalescence being addressed.

2.2.15 Bloor Homes have demonstrated that the masterplan for BD13 has addressed the coalescence risk and therefore the site is clearly suitable for allocation, and presents a better, more logical, well located and deliverable site than BD6, BD8, or BD12.

2.3 Strategic Environmental Assessment for the Barrow cum Denham Neighbourhood Plan (June 2022 - AECOM)

2.3.1 The Strategic Environmental Assessment for the Barrow cum Denham Neighbourhood Plan (June 2022) (SEA22) was prepared by AECOM reflecting that the housing requirement for Barrow cum Denham as 170 new dwellings to support the choice of a development strategy for the Neighbourhood Plan.

2.3.2 SEA22 has assessed a number of spatial strategy options as reasonable alternatives. These spatial strategy options comprise packages of the sites identified in SOAR, which are summarised below:

(We note that B13 in the SEA22 considered the reduced area, however as demonstrated above this is not required, as appropriate measures were included in the Bloor Homes proposed masterplan; and sufficient separation from Burnthorpe is achieved.)

i Option A: Delivery of new housing through an allocation at Site BD12.

i Option B: Delivery of new housing through an allocation at Site BD13. (Bury Road Site)

i Option C: Delivery of new housing through allocations at Site BD6, Site BD8 and Site BD12. Specifically, the sections of the sites which, when combined, create a neat edge to the southern part of the village. (Barrow Hill Site – as allocated in the Reg. 14 Neighbourhood Plan)

i Option D: Delivery of new housing through allocations at Site BD6, Site BD8, Site BD9 and Site BD12. All four sites are identified as having direct access to the existing road network.

i Option E: Delivery of new housing through allocations at Site BD9 and Site BD13. These sites are identified as the preferred site options within the West Suffolk Local Plan Preferred Options consultation document.

2.3.3 The table below summarises the rankings of the options with regards to their relative performance in the SEA22 in relation to each SEA Theme. As it is evident Option B (BD13) and Option E (BD9 and BD13) clearly outperform the other alternative options. For completeness, we provide review and response to theme areas where Option B and Option E were not the best options.

Landscape

2.3.4 Whilst SEA22 considers Option C to perform most favourably in relation to the landscape, the argument for Option B was that the development of the site would be less in keeping with the existing built form and development patterns, but the design of the new development could link with the existing housing to the north and west.

2.3.5 It is our position that Bloor Homes proposed masterplan has addressed the above point and would link the new development well with the existing housing in the adjacent sites. The proposal resembles the street line and built character of Barrow cum Denham. It is proposed that the development would provide a broad mix of new homes and tenures, providing high quality accommodation for both families and smaller households. It would also deliver a high-quality landscaped scheme to integrate and reflect the landscape setting of the site. The proposed masterplan of the Site ensures that the existing residential amenities of residents to the north and west are suitably protected.

2.3.6 It is therefore our opinion that the masterplan addresses the minor concerns raised by the SEA22 and therefore would be an appropriate option in terms of Landscape.

Historic Environment

2.3.7 SEA22 notes that consultation with Historic England is encouraged to ensure that development proposals at Site BD13 seek to implement sensitive design which respects and enhances the setting of nearby heritage assets (Barrow House and Carriage Gateway; and The Weeping Willow Public House).

2.3.8 We consider that the proposed development can appropriately address the historic surrounding of the site. We would also note that views from the mentioned 'Barrow House and Carriage Gateway' to the east are partially obscured by existing mature and tall tree lines along the site boundary as well as within the garden of the 'Barrow House'.

2.3.9 With regard to impact on 'The Weeping Willow Public House', the proposed masterplan includes extensive tree planting along the site boundary and especially to the northwest corner. This will minimise any visual impact on the heritage asset. Furthermore, it is considered that any detailed design work will address the location of the heritage asset and will protect its setting.

Land, Soil, and Water Resources

2.3.10 SEA22 notes that all the proposed site allocations comprise areas of greenfield land, all options have the potential to result in the permanent loss of productive agricultural land which cannot be mitigated. The only reason why Option C and Option D (Site BD6) are slightly more favourable in this respect, is that a small area in the northeastern section of the site is previously developed land. It should be noted that the developed area within BD6 is approximately 1.02ha.

2.3.11 We would like to highlight that the cumulative site area for Barrow Hill site (BD6, BD8, BD12) is equates to 13.51ha (based on site areas included in the SOAR); in comparison Bury Road site (BD13) only 10ha in area.

2.3.12 Following the logic of the SEA22 assessment the loss of overall agricultural land (even with the already developed land discounted of 1.02ha from Barrow Hill site) would be less if the Bury Road site (BD13) is allocated, rather than the Barrow Hill site which would result in a loss of 12.49ha of agricultural land; opposed to the 10ha loss from developing Bury Road site (BD13).

2.3.13 In terms of water resources and soil conditions all sites are considered to have the same characteristics.

2.3.14 Based on the above we consider that in terms of Land, Soil, and Water Resources the Option B, Bury Road site (BD13) would have the least impact and as such should be considered as favourable.

SEA22 Summary

2.3.15 As it is evident from the summary table from SEA22 above; Option B (Bury Road site - BD13) is the most favourable option for allocation with scoring best in 5 (out of 8) categories; opposed to Option C (Barrow Hill site - BD6, BD8, BD12) with scoring best in only 3 (out of 8) categories.

2.4 Strategic Environmental Assessment for the Barrow cum Denham Neighbourhood Plan (September 2023) AECOM

2.4.1 Along with the Neighbourhood Plan Reg 14 consultation an alternative Strategic Environmental Assessment ('SEA23') was published.

2.4.2 We note that the SEA23 is significantly less detailed or informative than the SEA22.

2.4.3 SEA23 after summarising the SEA22 goes on to briefly notes that:

"Since the completion of the reasonable alternatives assessment (June 2022) (SEA22), further discussions between the neighbourhood group, the Parish Council, and site promoters have taken place with respect to the design of the preferred site allocation."

2.4.4 We emphasise that no further information, evidence base, or meeting minutes of the extraordinary meeting on 17th October 2022 (where Barrow Hill site was allocated) are available which would demonstrate that the Barrow Hill site is a better, more sustainable, preferred or appropriate location for allocation.

2.4.5 The lack of evidence provided for concluding and allocating the Barrow Hill site over the Bury Road site, which is supported by sufficient evidence base, is considered to be untransparent and flawed in legibility. This is particularly the case given the fact that the Barrow Hill proposals that were presented to the Parish are now fundamentally different to those that are now being proposed through the Neighbourhood Plan with the community and sports benefits substantially reduced (see Section 4 below).

2.4.6 Therefore, we are of the opinion that the SEA23 lacks any credible evidence and does not provide any significant or concrete information

on how the previous evidence base was disregarded and a site which ranked as the 3rd option out of 5 gained allocation.

2.4.7 The site has been ranked third best in both the WSLP and AECOM research for the Neighbourhood Plan; however, the Parish felt that to allocate the alternative site, and their local connection with the landowners would better their chances of receiving the community benefits. This is not an evidence based, planning reason to allocate the site and does not bear scrutiny, especially given the substantial changes to the Barrow Hill proposals (see Section 4).

3 Neighbourhood Plan Process

3.1.1 The Parish Council have reluctantly accepted the figure of 170 homes, and based on the evidence base there are two potential sites for meeting this need, these being the Bury Road site and the Land off Barrow Hill.

3.1.2 Bloor Homes have continued communication with the Parish Council, to present a draft scheme to the Parish Council as part of a 'site comparison exercise' run by the Neighbourhood Planning Group. Bloor Homes was offered a 20-minute slot at short notice to present the scheme in an open public meeting, including details of potential community benefits (meeting minutes included in Appendix 4). The alternative scheme at land off Barrow Hill was also presented. It is emphasised that this site on Barrow Hill, is unfavourably ranked in the emerging evidence base for the both the Local and Neighbourhood Plan when compared to the Bloor site at Bury Road.

3.1.3 A further meeting was held with three members of the Neighbourhood Planning Group, of whom all sit on the Parish Council. Both Bloor Homes site and opposing sites were offered private meetings. The meeting sought to understand the proposed community benefits of the schemes, and to discuss issues and questions held by the Neighbourhood Plan Group.

3.1.4 Subsequent emails were exchanged regarding a proposed list of community benefits. This was accompanied with an offer by Bloor Homes to maintain communication and engagement with the Local Parish/Parishioners, to develop a sustainable community 'led' scheme.

3.1.5 A further meeting with both sites was requested by the Parish Council to 'iron out' final issues, and gather further clarity on the community benefits. Bloor Homes would have been very happy to engage in this discussion and indeed would have welcomed the opportunity, however, these meetings were called off at short notice with limited explanation.

3.1.6 A public, extraordinary meeting was called for the 17th October 2022, where the Parish explored the benefits of both sites. The Parish resolved to allocate the alternative site on Land off Barrow Hill. We like to draw attention to the fact that the Minutes of the Extraordinary Meeting called 17th October 2022 have not been made available as shown on the extract in Appendix 2.

3.1.7 The Barrow Hill site has been ranked third best in both the WSLP and AECOM research for the Neighbourhood Plan. The Parish felt that to allocate the alternative site, and their local connection with the landowners would better their chances of receiving the community benefits. This is an entirely inappropriate and flawed approach as any contribution would be secured by a S106 agreement which is a legal contract and therefore any personal relationship/connection would be irrelevant.

3.1.8 Bloor Homes have carried out public engagement with the residents of Barrow to understand what community benefits would be sought by residents. Bloor Homes can confirm that having reviewed the results of the public consultation the following community benefits could form

part of the Bury Road proposals: enhancing the current village hall, subsidies for bus services for 20 years, expansion of the school, expansion of the doctors/larger site, upgrading sports facilities or upgrading footpaths. Bloor Homes offered that the S106 agreement would be drawn up after consultation with the Parish Council. This position is as evidenced in the Parish Meeting Minutes from 05.09.2023 in Appendix 4.

3.1.9 Therefore, we would like to reiterate that any contribution would be subject to S106 agreement and there is no difference between having an agreement with someone whom with the parish council has a connection with (e.g Barrow Hill) or not (e.g. Bury Road).

3.1.10 Most importantly, as demonstrated in detail in the following section, the initial proposal of Barrow Hill site has significantly changed, and the proposed public benefits and facilities have been removed from the scheme.

3.1.11 The main reasons for the Barrow Hill site being favoured were the provision of such facilities and benefits. Given that these have been omitted over time/evolution of the masterplan it is questionable why the Parish still included it as allocation in the Reg 14 draft Neighbourhood Plan.

3.1.12 Furthermore, the allocation of the site is for 170 dwellings; however, we would like to draw attention to the fact that by simply calculating the site capacity with the location appropriate density (30d/ha), the Barrow Hill site has approximately 217.8 dwellings capacity, which is 47.8 more than the presented 170 dwellings capacity.

3.1.13 This figure is calculated as below:

I. Based on the SOAR data the Barrow Hill allocation site is 13.51ha (8.6+1.41+3.5). BD8 area is indicated as 'Employment' on the Barrow Hill allocation masterplan.

II. The remaining area for residential development is 12.1ha (13.51-1.41). Following the SOAR data calculation approach (Paragraph 4.4 SOAR) and applying 40% of site area for infrastructure and landscaping the remaining developable area of Barrow Hill site is 7.26ha (12.1*0.6).

III. Using the SOAR approach (Paragraph 4.4 SOAR) of 30 dwellings/ha the yield for the Barrow Hill site is 217.8 dwellings (7.26*30).

In comparison the Bury Road site has the following capacity: (following the same calculation as above):

1) Full area: 10ha

2) Remaining area after 40% set aside for infrastructure and landscaping: 6ha (10*0.6)

3) Yield for the Bury Road site is 180 dwellings (0.6*30)

3.1.14 Based on the above it is evident that the capacity of the Barrow Hill site is significantly greater, (48 units more) than 170 dwelling. Whilst the Bury Road site sits much closer to the 170 dwellings requirement.

3.1.15 Therefore, we are of the view that the representation of the allocated Barrow Hill site capacity is misrepresented and misleading.

3.1.16 Moreover, the Barrow Hill allocation only provides for 30% affordable housing, whilst the Bury Road development will be proposing 40% affordable which is in line with the WSLP draft Policy NSP29 requirements.

3.1.17 Therefore, we are of the opinion that the Parish Council, despite all the evidence and feedback has allocated the Barrow Hill site based on

community benefits that no longer exist and because of a connection to the land and landowners; not taking into account the professional evidence base or the local residents preferences.

4 Barrow Hill Allocation Proposal Changes

4.1.1 We would like to draw attention to the fact that the Barrow Hill site proposals have significantly changed since its initial master plan proposal as presented to the Parish Council and residents. These stages are set out below, demonstrating that the public benefits that the site promoters have promised and on which the Parish Councillors made the decision that the Barrow Hill site was preferable to the Bury Road proposal have fallen away over time.

4.2 First Version

4.2.1 The original Barrow Hill proposal promised extensive community benefits such as new community building, playing and sports pitches, formal recreation ground of 5 hectares, and the protection and expansion of Willsummer Wood (shown below).

4.2.2 We would note that, even though the initial proposal included good public benefits it would still relocate those facilities to the south of the village away from the centre which is a more unsustainable location. It is also evident that the facilities would not be conveniently and equally accessible for locals around the village, and mainly would benefit the people who would have moved into the new development. From the public engagement events undertaken by Bloor Homes this was also a view shared by the residents of Barrow.

4.3 Revised Version

4.3.1 The scheme has now changed substantially and been reduced in size, removing the playing fields, reducing the open space and community grounds and benefits; only retaining the indicative for community building and assisted living.

4.3.2 We would note that, even though the revised version has retained the indicative community building, it would result in the location of such facility away from the village centre in a more unsustainable location; which is in our opinion would not be utilised as much as the existing Village Hall which is preferred by residents and which Bloor Homes are proposing to commit funds to for its restoration through S106 contributions in consultation with the Parish Council.

4.4 Allocated Version

4.4.1 Lastly, as it is visible in the Reg 14. Draft Neighbourhood Plan, the Barrow Hill allocation by draft policy BCD2 was further reduced, and public benefits, such as new Community Facility and sports facilities/ open space, have been fully omitted.

4.4.2 Whilst draft Policy BCD2 point (iv) notes that provision of a suitably located new Care Home should be provided by the proposal the

wording of point (iv) allows instead of a Care Home to deliver ‘other identified forms of assisted living accommodation and/or general provision for later living needs, including new bungalows.’

4.4.3 Given the wording of draft Policy BCD2 provides flexibility to potentially not provide the Care Home and only provide general bungalows we are of the view that even the minimal remaining public benefit of the site has the potential to fall away. Meaning that the development would not provide any public benefits and would extend the village to the south with very limited sustainability/accessibility credentials as it stands.

4.4.4 Furthermore, the draft Policy BCD2 (i) only requires 30% affordable homes provision, whilst the WSLP draft Policy NSP29 requires 40% affordable provision on greenfield sites of 10 or more dwellings or 0.5 hectares or more. Therefore, it is clear that the allocation of Barrow Hill site would not comply with WSLP.

4.5 Summary

4.5.1 Over time the Barrow Hill site proposals have significantly changed and the public benefits that were originally proposed and on which the Parish Councillors decided that the Barrow Hill site was preferred to the Bury Road proposal has fallen away, leaving an allocation proposal which provides close-to-none public benefits. Therefore, its allocation has no clear logic, evidence or benefits that might outweigh the clearly evidenced preference and suitability of the Bury Road site.

5 Bury Road Public Consultations

5.1.1 Bloor Homes have maintained continued communication with the local residents of Barrow alongside discussions with Parish Council and the Neighbourhood Planning Group since 2021.

5.2 Summary of Public Consultation

February 2023

5.2.1 Initially, a community workshop session was held at the Barrow Village Hall, The Street, Barrow, on Wednesday 7 February 2023, between 4pm and 8pm. To inform locals a flyer was sent to 1,002 addresses in Barrow and Denham End, to notify them of the community workshop; as well as the Parish Council was notified before the flyer was sent, out of courtesy, and members of the team visited the Parish Council meeting the Monday before the session to field questions and provide further information.

5.2.2 The community workshop session followed a consistent and focussed engagement with the Parish Council, local residents and District Council through presentations, representations to the plan making process and individual enquiries since 2021.

5.2.3 A total of 120 stakeholders attended the workshop,

these have already been emailed to the Parish Council together with photos, please refer to the email version, sent here also for the purposes of recording the objections on the NP portal.

Two objections to the Parish Council's Neighbourhood Plan 2023 with reference to surface water drainage and the foul drainage system

1 Inadequate and out-dated surface water drainage systems causing large areas of standing water on roads and pavements

Barrow Hill and The Street, in Barrow are prone to several large areas of standing water, causing cars to have to drive down the centre of the road or very slowly through deep water, creating high water movement at the sides of the road, drenching pedestrians, who are also unable to walk on many parts of the pavement at these times. The village, like most other villages, has ancient and inadequate drainage systems of gullies at the side of the road, that are long overdue an update. This is a situation that is only likely to worsen with climate change. And if the additional housing at Barrow Hill does go ahead, the subsequent increase in traffic on Barrow Hill and through the entire length of the village, will further exacerbate this.

Conversely, there is a length of road on Bury Road, which is prone to an area of surface water, and Bloor Homes, (proposed developers at the Bury Road site), have listened to residents affected by this, and have currently proposed to include new surface water drainage systems for the affected area, through the installation of Beany curbs, the possibility of altering the camber on the road and the clearing out of the ditch, to aid dispersal of the water drained from the road.

In the April Parish Council meeting, when standing water on the roads in Barrow was discussed, the parish council said they had approached the County Council, many times, but they will not do anything to rectify this. And that with the promise for improved drainage from Bloor on Bury Road, this is the only chance the village has of addressing this issue, and that future developments should include improvements to roads, as part of the agreement.

But no such provision for addressing the surface water drainage issues along Barrow Hill and The Street, has been put in place within the Neighbourhood Plan, prior to any further construction at Barrow Hill. Provisions which, given the amounts of surface water in these areas, need to be clear, effective and binding.

2 Out-dated foul drainage systems (sewerage)

Many residents on the Woodland Rise development and Barrow Hill are experiencing problems with the foul drainage system. The system was installed years ago and not intended for the number of houses it is being asked to support nowadays. Again, no provision or agreements have been put in place to up

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The various sites that have been suggested for additional housing are unbalanced in that they show no provision for the additional services\utilities which would be required for an increased population. Existing roads, schools, storm water disposal, sewage are only some

facilities that are already at full or near full capacity. Adoption of any expansion without associated upgrading of services will lead to non compliance with JOINT DEV. MAN. POLICIES DOCUMENT 2031, policy DM13, PARA 2.25,2.26,2.29.

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I object to the parish councils neighbour hood plan for 170 new houses.

I think the traffic and extra vehicles driving through barrow hill will make an already dangerous road even worse especially at the speed vehicles drive through there, even more so with construction traffic for approximately two years.

The site at colthorpe lane would be much better suited for use of traffic for the A14 and better and safer access to the school.

Also the location at Barrow hill would likely destroy the wildlife and forest.

Barrow hill is does not have suitable drainage roads or walkways for 170 new homes

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Hi

Comments as follows:1) There isnt a great deal of detail to support the proposal and this is essentially non binding with suggestions that can be changed at a later date in accordance with planning policy 2) Turleys have previously represented Pigeon developments on similar schemes involving part of the land in question (with submissions to the LA in 2020) which raises questions regarding impartiality and conflict of interest given the number of planning consultants in the area that could have undertaken this work 3) the land in question to the south of lylleyesfield drive was rejected under the Rural Plan as introducing coalescence with Denham by the LA which undermines planning policy 4) drawing additional traffic from the south of the village creates a significant amount of movements that adds pedestrian risk with no firm proposals to mitigate against this, particularly given the nature of the road and hedgeways. This simply adds to the issue of traffic coming from Chedburgh and vice versa, particularly with HGV's seeking a route to the A14. 5) I suspect that the likely market for these properties would possibly come from those working in Cambridge (in part) given the cost of accommodation there and therefore a more logical site would be to the north/east of the village which would make sense as traffic movements to the south would be reduced on an already busy road. Further, it would also mean that those travelling to Bury would not need to go entirely through the village.

Thanks.

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The Parish Council have failed to give due regard to the parish's preferred area for development. The Report on Responses to Questionnaire is a supporting document for the Neighbourhood Plan. Question 32 of the Questionnaire asked 'if more homes had to be built in the parish, in which sector of the parish would you prefer that they were built?'. A map of the parish showed 4 sectors – north east, south east, south west & north

west. The north west sector (4) was, by far, the most preferred sector, because of its situation near the A14.

By selecting a site south of the village, the Parish Council has failed to give due consideration to traffic which would have to travel through all the village to the main access routes.

81.9% of responders voted for sites other than Barrow Hill. The Parish Council's Neighbourhood Plan is therefore taking no notice of the wish of the Parishioners, again as indicated in the Parish Council's own 2020 Neighbourhood Plan Questionnaire.

The Colethorpe Lane site is closer to the A14 and will not bring traffic through the village. It provides homes nearer to the school enabling pedestrian access rather than driving through all the way through the village and the developers' style of housing is much more in keeping with a village.

It will create an increase in traffic, around an extra 300 vehicle movements per day through the entire length of the village, whereas the Bury Road and Colethorpe Lane sites will not have the same impact. Traffic from the Bury Road site when heading to Bury St Edmunds will go through Saxham and when going to the A14 or Mildenhall will only go through half the village. Colethorpe Lane housing would likely go directly to the A14 for the majority of journeys, completely avoiding the centre of the village.

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The proposed plans clearly take no account of general village opinion or of clear future traffic issues.

The Barrow Hill Road going out of the village is becoming more and more of a road that drivers simply ignore speed limits. How there has not been a serious accident on the junction of Beale Road really is a miracle. The junction is on a slight bend on the road making it difficult to see for drivers entering Barrow Hill from Beale Road. The speed that the majority of drivers exit the village is in excess on 30mph. And by the time they have come to the Simpson Way junction they have possibly added an extra 10mph on their speed.

Therefore the proposal to build even more homes at this end of the village is certainly not logical in any sense of the imagination. More houses bring families. And in these days of everyone having cars...the number of short journeys from one end of the village to the other end of the village in a car, so children can be dropped off at school, is set to vastly increase.

Building new homes nearer the school is not only more sensible for a number of reasons, but certainly won't increase traffic as much as having

new homes being built at the Beale Road / Simpson Way end.

I believe the following questions need to be asked.

- 1) are the council happy to increase traffic volume by allowing new homes to be built at the Beale Road end of the village instead of nearer the school..?
- 2) are the council prepared to take responsibility for the increase in environmental damage by the increase in traffic that will be caused by having more homes built at the Beale Road end rather than the school end which will clearly result in more traffic in the village as families take their children to school by car?
- 3) are the council prepared to take responsibility for the added risk to families and young children who might walk to school by the increase in traffic?
- 4) are the council prepared to disrupt the wildlife in the woods by the building of homes at the Beale Way end of the village?
- 5) are the council prepared to take responsibility for going against the wishes of the vast majority of the village that don't want any new homes built at all?

It does seem that the council needs to address these issues most urgently and either come up with valid reasons for the current draft plan or simply make a sensible and correct decision by re-thinking and submitting a new draft.

Appendix 5: Feedback Comments - Hardcopy Forms

Hardcopy feedback forms (22)

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The state of the roads is important - especially to A14 E already crowded and will be more so with this development

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Current allotments are not currently all utilised - instead of more allotments, why not create a community garden

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Footpaths to make a circular walk. Proximity of care home from current shops could be an issue

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As someone who has lived along Bury Rd my whole life - and opposite to the proposed BR site - I see the proposed housing development here as being detrimental to the functioning of the village, with two leading reasons being habitat damage and the lack of infrastructure in the village to meet the demands of the village and new residents of the estate.

152

Only to say thank you to all on the Parish Council team for all your hard work.

153

Whilst appreciating the need for growth and the provision of a balanced housing stock, this must always be achieved by seeking to minimise the environmental impact upon the human community and nature of the area. In addition, there must be a great consideration given to the development of the infrastructure of the settlement in its broadest sense. Provision and sustainability of amenities and facilities are also vital as is the overall socio-economic and cultural impact of any such planning. To this end there can be absolutely no argument that the vision in this Neighbourhood Plan is by far and away the most logical and beneficial for the present and future lives of our residents.

154

I support the neighbourhood plan for Barrow because it's the best way forward for the village amenities, like the school, the surgery and help protect the infrastructure. It has the full backing of the Parish Council and it will help to prevent further building in the village of even more houses, which cannot be sustained or supported.

155

If the NP does go ahead, it states it will protect 'existing community facilities' but how would it 'support further growth' especially of the school and the young people of the village? School parking, increased demands on the surgery, increased traffic flow throughout the village, solutions to reduce speeding, improvement to drainage to counteract flooding in the village - it would be great if all of these could be addressed

156

In backing the Neighbourhood Plan I very much hope that there will be more scope for input by local residents in the shaping of new development in Barrow. A suggestion concerning the development off Barrow Hill. Could allotments or a community garden be incorporated into the plans? I think this would help nurture a sense of community. This could also be open to other residents of Barrow Hill.

157

This would keep the impact to a minimum and allow the village feel to be maintained.

158

I believe the village will lose its identity if they proceed on the Bury Road. They should carry on where there are already new houses it continues the overall look. More building at the heart of the village will take away its beauty.

159

I totally agree with the parish councils recommendation.

160

Response to Public Consultation Barrow-cum-Denham Neighbourhood Plan

Regulation •14 Pre-Consultation Draft 12th September 2023

I wish to object strongly to the visions set out in the draft Neighbourhood Plan (NP) prepared by Turley Strategic Communication on behalf of Barrow-cum-Denham Parish Council (PC).

Below are several key reasons to support my objections which is certainly not a comprehensive list and may be subject to amendments or further additions at future consultations, meetings etc prior to formal submission to West Suffolk District Council (WSC) later this year.

1 . Neighbourhood Plan

The NP is a lengthy document, 106 pages and generally, uninformative, repetitive, dull, does not particularly actively engage the reader, extremely subjective in several instances, many facts are either misleading or misguided and certain areas are totally irrelevant to the village. This undoubtedly detracts Parishioners from comprehensively reading the NP and fully digesting its content and could be made much leaner, it is not until approximately Policy BCD2, halfway through the NP, that constructive factual statements start appearing.

In total the 106 page NP comprises, less than two thirds facts and more than one third fiction:

Facts 67 pages 63%

- Front / back 2 pages 2%

Pictures 13 pages 12%

Index pages 4 pages 4%

Headers 17 pages 16%

- Blank 3 pages 3%

2. Conflict of Interest

There is very strong evidence to suggest that there are major conflict of interest issues with regards to the recent appointment of Turley Strategic Communications to finalise the production of the NP after the resignation of previous planning consultants and this immediately raises several concerns.

Turley were appointed after a weak and rushed tender process by the PC where few consultants were approached or considered. The PC has provided little if any evidence to facilitate a thorough independent audit exercise to support or deny any possible conflict of interest, this is even after numerous requests through the PC meeting public forums and correspondence.

It is very clear that Turley work extremely closely with their client Pigeon, for which Mr William Stanton, Founding Director and one of the landowners for Barrow Hill site and are extremely active on numerous local projects together, most recently proposals for the relief road and housing development at Westley on the fringes of Bury St Edmunds.

Involvement by Turley on the NP clearly compromises the integrity of the NP, Turley feeling a strong obligation to favour the objectives of their major paying stakeholders and client rather than serving the prime interest of Parishioners for which the NP is sacrosanct.

There is also very strong evidence to suggest conflict of interest towards Cllr Jane Steer, with a very strong association with landowners for Barrow Hill.

A document produced by Turley in December 2020 entitled "Land of Barrow Hill, Barrow (SHELAA Ref: WS012a and WS228)" quotes within the executive summary, page 2, the following:

This Delivery Statement (the 'Statement') has been prepared by Hopkins Homes and Pigeon Investment Management Ltd ('Pigeon') on behalf of 'William & Sophie Stanton' and Nigel & Jane Steer ('the Landowners'), who are promoting Land off Barrow Hill (SHELAA Ref: WS012a and WS228) (the 'Site'). The land has the potential to deliver a mixed-use scheme comprising new market, affordable and self-build homes, community use,

outdoor sports pitches, and new high-quality landscape and public open space.

Cllr Jane Steer has taken the minutes for several PC meetings, as recent as 1 5th May 2023 and 05th June 2023, even although NP matters and site selection proposals have been discussed on the agenda, which is totally unethical placing the impartiality and factuality of these minutes in complete jeopardy. The latter minutes are available on the PC website clearly initialled, however, many minutes become sporadic from the end of 2022 to present with many missing and not available for viewing, could this please be rectified and missing minutes uploaded to the PC website immediately.

Similarly, to a lesser extent Cllr Peter Wesley, as an employee of landowner Mr William Staton, is also in a very favourable position to possibly influence PC and NP decisions and issues.

I have attended numerous PC meetings and I can confidently state that I have never witnessed either Cllr Jane Steer or Cllr Peter Wesley been asked to leave the room when matters relating to the NP or site selection have been discussed, which I would suggest places these individuals in a favourable position and at an advantage with regards to sensitive information available only to the PC and not afforded to other landowners and members of the public.

The NP also refers on many instances to independently examined, checked, analysed yet Turley are far from being an independent body with their strong association with Pigeon, Mr Willam Stanton and Cllr Jane Steer.

On principle Turley, or any other independent consultant for that matter, must be seen to be totally unbiased, transparent and fully accountable and any professional judgement must not be seen to be compromised, difficult to ascertain when Turley are acting with multiple interests for more than one client, namely the PC on NP matters, Pigeon, as well as multiple landowners.

3. NP Site Selection

Firstly, the NP appears not to have taken into consideration the fact that according to responses received by Parishioners to Question 32 of the Questionnaire 03 rd February 2021 , revision 1.0, sector 4 clearly proves to be the most popular sector gaining an overwhelming 55%, roughly three times that of other sectors at 12%, 18% and 15%, the main factor influencing this decision, as stated in Question 33, is unanimously at 54% attributed to 'traffic / transport' concerns.

Furthermore, the proposed site allocation in the NP, is certainly contrary to the preferred site identified by the Planning Consultants at the site selection stage using the ranking criteria process adopted by the PC and identified in minutes 25th August 2022, tested against five criteria — biodiversity and geodiversity; climate change; landscape; historic environment and land, soil and water resources.

NP page 46, 4.9 'the location of which, has been carefully chosen on the basis of an independent, comparative site analysis using an appropriate and objective site selection methodology'.

Subsequently in the minutes from the extraordinary PC meeting on 18th October 2022, confirms that under assessment by the PC's independent

consultants AECOM, of the sites proposed the site at Barrow Hill site came last on the scoring system, item 6208, "some way behind, on 23.0 points", with many extremely convincing reasons minuted as to why this poor score was the case and these do not seem to have been presented at all in the NP.

The NP also fails to refer or take cognisance to the fact that West Suffolk Council (WSC) have for some time considered the site south of Bury Road by Bloor Homes as the preferred location for new homes in Barrow. This is a fact well recognised and accepted by the PC.

This preference by WSC is clearly demonstrated in the emerging WSC draft Local Plan, Part Three — Site Allocation, open for consultation 26th May 2022 to 26th July 2022 and which is currently at Issues and Options stage.

- 3.01a — Land South off Bury Road (BD13) — 10 Ha / 150 dwellings
- 3.01b — Land South of Denham Lane (BD9) — 0.66 Ha / 20 dwellings

West Suffolk Local Plan Preferred Options consultation - Appendix A Part Three - Site Allocations .pdf(Review) - AdQbe cloud storage

Worth noting, the original number of dwellings proposed by previous Planning Consultants suggested a figure of 77 dwellings, yet under continued duress by the WSC, the PC were made to concede and accept the current figure of 170 dwellings.

With regards to preference by WSC towards the Bury Road site, there has been no guarantee received to date from either the PC or WSC that should a different site be selected in the NP, that the number of dwellings could then be in addition to those identified for Bury Road, therefore, potentially this may double up to 340 dwellings to also include allocation at Barrow Hill also combining with allocation at Bury Road.

PC meeting minutes 06th June 2022 clearly minuted under item 6111 and 25th August 2022 item 6152:

'WSC wamed if the Parish Council persist with their own housing figure, Barrow could end up with both the 77 (now 170) and the 170".

'There is a real possibility that Barrow will receive a further 170 houses".

"Concerns were raised that if a site/s different from WSC's preferred sites is/are put forward, there could be a danger that all sites would be developed"

"Cllr Kronbergs closed the public forum by stating that if the Parish Council persevered with the number of 77 houses (now 170) WSC have said that could leave the village open to the 77 (now 170) plus the 170"

Surely the omission of this key important fact is total misguidance towards Parishioners, a point expressed on page 9, under 1.5, should WSC wish to go down this route.

'However, Neighbourhood Plans cannot prevent or restrict developments which have already been allocated in an adopted Local Plan"

4. Proposed Site Allocation — Barrow Hill

Development of this site elongates the village to the south further away from key services and facilities and exacerbates the inevitable increase in volume of traffic expected to traverse the full length of the village, adding further to the concerns by Parishioners to traffic issues that already exist.

At the Extraordinary PC meeting 18th October 2022, a decision was surprisingly taken to include Barrow Hill site within the NP by 4 votes (Cllrs Ford, R Rawlings, Bragg, K Rawlings) and 1 vote for Bury Road (Cllr Kronbergs). This seems contrary to expert advice and opinions indicated by Planning Consultants, the NP Subcommittee and responses received through the Questionnaire, regarding proposed site selection.

It would be extremely interesting to understand what impartial criteria Councillors took to arrive at this final decision and to have this clearly expressed since little evidence has been reported.

Page 46 of the NP under 4.10, suggests Barrow Hill to be "single site" yet this is clearly inaccurate and incorrect, the development forming a partnership between three sites scattered east, south and west of Barrow Hill (AECOM definition June 2022) and three separate landowners, namely:

- BD6 Land East of Barrow Hill 860 hectares e BD8 Land South of Barrow Forge 1 A1 hectares
- BD12 Land West of Barrow Hill 3,50 hectares

At a total of 13.51 hectares, based on typical norms of 30 dwellings per hectare, this could potentially be scope for approximately 405 dwellings, not 170 as stated in the NP. There is no formal or legal obligation given in the NP by either the landowners or the PC to commit or guarantee to the figure of 170 dwellings, potentially turning the land allocated to the sporting facilities, care home and employment areas into further housing should little or no interest be received for these insupportable ventures.

A huge risk and comparison which can be easily made with the recent threat at nearby housing development at Marham Park, Bury St Edmunds, where it received much outcry when the proposed retail / shop development was in extreme danger of being descoped in favour of additional housing due to poor interest from businesses in these ventures because of extortionate rate and land prices. An issue which still largely exists and is yet to go away.

To further exacerbate traffic issues, these three sites, being on opposite sides of Barrow Hill, would create a substantial number of additional road junctions within a very short distance to facilitate ingress and egress to the new proposed sites:

- New housing developments e New employment areas
- New sports facilities I Amenity space
- New care home
- etc

This would be in addition to existing junctions:

- Johnson Road
 - Beale Road, Woodland Rise
 - Simpson Way, Grove Park
 - The Forge
 - Pigs in the Woods
-

Concerns have already been raised and identified by residents of Woodland Rise at PC meetings as "an accident waiting to happen" with regards to poorly designed junctions creating poor visibility and speeding traffic through the village.

I attended the PC meeting 07th November 2022 and during the Public Forum, a resident of Woodland Rise raised major safety concerns with regards to the junction off Beale Road onto Barrow Hill. There are no minutes available on the PC website so I am unable to state what was exactly minuted, yet I managed to make some notes:

"Concerns were raised over poor visibility which at 2.4m back, should be 43m and vegetation should be no greater than 80cm tall. The clerk was handed a section from a design document for Highways from the resident and agreed to contact Hopkin Homes since the road was yet to be adopted at that point"

5. Proposed Site Allocation Land South of Bury Road

As previously noted above, Bury Road site still remains the preferred site by WSC in their emerging Local Plan, favourably located to key village services and facilities and departing from the current ribbon development pattern.

The developer Bloor Homes have undertaken several resident focused consultations and presentations on 08th February 2023 and more recently 17th October 2023, where they have carefully listened and considered comments from the local community and stakeholders and evolved and delivered an improved masterplan based on that constructive feedback.

Bury Road current proposals identify many detailed community benefits, particularly with flooding and drainage improvements along the entire site frontage of Bury Road. There are also proposals mentioned offering changing room facilities for the local football club as well as refurbishment of Barrow Village Hall.

The NP makes several references to proposed sites possibly causing coalescence with either Denham or Burthorpe, suggestions that the Bury Road site may coalesce with Burthorpe is irrational, considering the positioning of the large, wooded wetland area to the North East of the site, this being the closest extremity to Burthorpe and forming a 'soft' landscape buffer on the approach to Barrow from Saxham direction.

The NP also fails to recognise the fact that in closer proximity to Burthorpe is Papeley Meadow, yet this has never been deemed to be an issue with coalescence, simply classed as Barrow. What is the difference?

Location of this site at Bury Road also offers fewer traffic through the full length and heart of the village expecting most movement to be away from Barrow towards Saxham and Bury St Edmunds or along Colethorpe Lane towards the A14, Newmarket, Cambridge and beyond.

6. Sporting Facilities | Community

The facts in the NP relating to the requirements for additional sport and recreational provisions are absolutely misguided and misleading.

Page 39, item 3.79 of the NP suggests that:

'Whilst 59% of the 370 respondents to Q15 considered that Barrow-cum-Denham had sufficient sports and leisure facilities, a total of 25% of the adult population either disagreed or strongly disagreed with this sentiment. This indicates that a quarter of the Neighbourhood Plan Area population considered that their sporting and recreational needs were not being met'.

The real figure is in fact 59%, but 75% (15.7% strongly agree and 59.2% agree) of residents agreeing that Barrow cum Denham has sufficient sports and leisure facilities. It is absurd that the NP should focus on the figure of 25% that disagree, it appears as though the NP is totally misleading Parishioners over the true findings of the questionnaire.

The village already has many active sporting facilities, to include the village field regularly used for football matches, 442 Football Academy coaching sessions, tennis courts, skate park, comprehensive children's playground as well as Suffolk Academy offering an assault course, 24 hour gym, martial arts, archery, mini golf and the village also actively promotes regular road runs and marathons, therefore, there is already a real, strong sense of good health and wellbeing within the village.

I am led to believe that Barrow many years ago had a cricket pitch off Colethorpe Lane, by the "butterfly farm", yet due to lack of interest the club fell into neglect and disrepair and it should be noted that adequate facilities already exist at Ickworth for the few that wish to participate and it is only a short distance away, only 6 miles away.

Page 85 of the NP "seeks to minimise the impact of future new development on the existing local highway network, by encouraging walking, cycling" yet the proposed new sporting facilities shall not solely be used by locals, encouraging for financial reasons people from Bury St Edmunds, Newmarket, Cambridge and nearby surrounding areas, will the cycle routes, enhanced transport measures etc extend to these areas to encourage these peoples to walk or cycle to avoid impacting the existing highways network, I suspect not they shall drive for convenience. On the same page of the NP, item DCD12.1 clearly contradicts its own vision above suggesting more cars:

"Given the current level of accessibility to public transport, in Barrow cum Denham, the private car therefore remains the primary mode of transport for journeys outside of the Neighbourhood Plan Area".

7. Care Home

The NP does not appear to clearly demonstrate whether it includes for provision of Care Home facilities and are certainly not shown on any outline plans produced indicating likely locations. Neither does location of the Sporting amenities clearly feature in any plans.

Many vague statements appear in the NP which certainly does not give the impression that Care Home facilities shall be delivered, yet this is supposed to be one of the major community factors supporting the Barrow Hill site selection. It is even not clear whether this shall be a Care Home or bungalows.

"To support the delivery of a new Care Home, or other forms of assisted living accommodation, to cater for later living needs, such as new bungalows".

"provision of an appropriately located and scaled Care Home or other form of assisted later living"

"Which could comprise a Care Home, and/or affordable modern bespoke business space provision for new employment start-ups and other forms of agile remote working"

"The provision of a suitable/v located new Care Home or other identified forms of assisted living accommodation and/or general provision for later living needs, including new bungalows"

8. Conversion Farm Buildings

The NR in numerous instances implies that development in addition to the 170 dwellings may be considered, particularly relating to agricultural buildings. This appears to open the floodgates and give a 'carte blanche' in favour of current landowners associated with this document.

"Conversion and expansion of farmsteads for residential uses"

"conversion of existing agricultural buildings to other appropriate development uses"

'Proposals for the conversion of redundant or disused rural buildings"

"In addition to the strategic site allocation for up to 170 new homes"

"This Plan therefore allows for small infill, or other brownfield redevelopments, to come forward for additional new homes, on suitable sites"

"In addition, proposals for the conversion of redundant or disused rural buildings, including agricultural barns for residential use outside of the defined Settlement Boundaries"

161

This NP does not take any account of what the parishioners expressed on the questionnaire of 2021. The proposed plan will elongate the village bringing through unwanted vehicles that the current infrastructure can barely support now. The sporting and leisure activities are totally unwarranted we have more than adequate facilities in the centre of the village which is accessible to everyone at present. Therefore I totally and completely am against the NP as it is. The Bury Rd site remains the favoured site. It will keep the village more nuclear, avoid potentially more vehicles trying to navigate through the village and inclusion of Barrow Hill could potentially create 170 + 170 houses equals 340. Why would you think the parishioners would be accepting and happy about this?

162

The PC Neighbourhood Plan is fundamentally flawed. Why anyone would prefer to build a housing estate next to a historic wood (Wilsomme wood) I don't know! The councils preferred plan to build on the site off Bury Road is much more preferable, more central more amenities causing less traffic journeys, closer to school in the village too.

163

A stunning village will be ruined. The nature walks, bridle paths and wildlife impeded. Barrow has a campsite, large riding school with a modern "Estate" that will affect tourism lose the quaintness of village, increase traffic for the horses and safety of the public. A very realistic alternative has been put forward but the remit is clearly "cheap" housing despite the heritage, environmental surveys, etc if building an extension but they can get away with not doing this.

164

All future housing development should be along Calthorpe and towards the A14 to ease the traffic in the centre of the village

165

Thoroughly disagree with this! We do NOT need to expand, we are a village - not a town and expanding will cause us to lose everything Barrow is. Don't do this!

166

It is absolutely absurd - we do not have the infrastructure as it is, the doctors are not adequate as it is, we need more. It is taking away everything that this place is about. No schooling, social places, shops and on and on. NO WAY.

167

Narrow road and footpath unsuitable for increased traffic flows. Existing footpaths are poorly maintained and unsafe. Existing drainage is inadequate as roads and footpaths are flooded with minimal rainfall. Pedestrians are soaked with existing traffic. Reduction in productive farmland not conducive to sustainability. Removal of green spaces enjoyed in safety by families and pets. Preference for housing development to the north of the village as there is better access to A14 what would minimise the additional traffic passing through including all large construction vehicles for plant, materials and equipment.

168

My preference is Barrow Hill. To reach the A14 the traffic from both sites has to go through the street and the junction with Bury Rd is very busy making it difficult to turn right at certain times of day, so more vehicles from Bury Road would only make it more difficult.

169

Undecided about benefit to village. Preference Barrow Hill site. I am truly concerned that the development - Bury Road - will affect my personal life. Not least the noise. Having experienced the constant beeping of fork lift trucks for 2 years on a development to the rear of my property (no sound barrier!) I live in Dale Tree Road. My retirement bungalow. Beautiful quiet area undisturbed by traffic or building works now. My view is that the Barrow Hill site is the most suitable as it does not impose on an area that is of this nature. The traffic is far less at that site, access is easy so no disruption on Bury Road (which gets a lot of traffic already). It does not make sense to cut down long standing trees and hedgerows - what about conservation, pollution, quality of life for older residents?

Appendix 6: Statutory Responses



Cllr Ralph Rawlings
Barrow cum denham parish council

Our ref: AE/2024/129206/01-L01
Your ref: BCD reg14
Date: 05 February 2024

Dear Sir

BARROW CUM DENHAM NEIGHBOURHOOD PLAN - REGULATION 14 PRE-CONSULTATION DRAFT

BARROW CUM DENHAM NEIGHBOURHOOD PLAN AREA

Thank you for consulting us on the Draft Neighbourhood Plan for Barrow cum Denham.

We have had to prioritise our limited resources and must focus on influencing plans where the environmental risks and opportunities are highest.

For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

We note the West Suffolk Local Plan is currently in Consultation with aim to be adopted soon. We have also identified important environmental constraints, within our matrix for currently screening neighbourhood plans, that affect this Neighbourhood Plan Area. We are, therefore, providing you with the following advice which identifies opportunities for you to strengthen the Plan and enhance the scope of environmental Objectives considered.

We have identified that the neighbourhood plan area will be affected by the following environmental constraints within our remit:

Flood Risk

The Neighbourhood Plan includes areas of Flood Zones 2 and 3 within the Neighbourhood Plan Area. The Local Authority’s Strategic Flood Risk Assessment

and Surface Water Management Plans forms the evidence base to determine the level of flood risk in this area.

Water Quality

We note that the current Draft Plan does not include any objectives or policies to manage foul water drainage. We consider that the Plan could be improved by adding a section regarding this.

We would still expect to see consideration for any windfall developments captured in a relevant policy for Water Quality in the catchment of the Plan Area and serving WRC.

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the [Building Regulations &c. \(Amendment\) Regulations 2015](#). However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in [Part G of the Building Regulations](#) enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the [BREEAM](#) 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at [Abstraction licencing strategies \(CAMS process\) - GOV.UK \(www.gov.uk\)](#).

SPZs/Aquifers

The plan area includes areas of sensitivity for groundwater contamination. The area is covered by a principal aquifer and parts of area is also covered by SPZ 1, 2 &3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

We trust this advice is useful.

Yours sincerely

Mr Giles Ward
Planning Officer

Direct e-mail planning.eastanglia@environment-agency.gov.uk



Historic England

By e-mail to:
Cllr Ralph Rawlings
Barrow cum Denham Parish Council

Our ref: PL00794886

Your ref:

Date: 16/02/2024

Direct Dial: 01223 582709

Mobile: 07766 206210

Dear Cllr Rawlings,

Ref: Barrow cum Denham Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of this Neighbourhood Plan.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.

At this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below, which may be of assistance. The conservation officer at your local planning authority will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.

Site Allocation Land at Barrow Hill (BCD 02)

We welcome that this policy is supported by a concept design for the proposed mixed-use site, and the Strategic Environment Assessment suggests mitigation through careful design, screening and pro-active engagement from potential developers with Historic England to avoid impacting upon the setting of the listed buildings situated in the village core. We would recommend reference to the design guidance and code document is also made here to ensure potential developers understand the character and need for good design in Barrow cum Denham.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU

Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Historic Environment Policy (BCD 11)

We also welcome the inclusion of policies which seek to protect, enhance and celebrate Barrow cum Denham's historic environment. We note, however, that the focus of this policy is the area's designated heritage assets.

The government's National Planning Practice Guidance on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale.

Your Neighbourhood Plan is an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character.

Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

The neighbourhood plan is also an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance.

An historic environment section of your plan could include policies to achieve this, for example; identifying potential Conservation Areas. Historic England's guidance notes for this process can be found here: [HE Advice Note 1 - conservation area designation, appraisal and management](https://www.historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments), and here: <https://www.historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments>

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Suffolk County Council.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 [HistoricEngland.org.uk](https://www.HistoricEngland.org.uk)

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result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Ross McGivern
Historic Places Advisor, East of England
Ross.mcgivern@HistoricEngland.org.uk



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Date: 06 February 2024
Our ref: 462352
Your ref: Barrow cum Denham Neighbourhood Plan



Cllr Ralph Rawlings
Barrow Cum Denham Parish Council

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Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

ralph.rawlings@barrowcumdenhampc.com

T 0300 060 3900

Dear Cllr Rawlings

Barrow cum Denham Neighbourhood Plan - Draft Regulation 14 Consultation

Thank you for your consultation on the above dated 21 December 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

Date: 19 January 2024

Enquiries to: Georgia Teague

Planning Officer

Tel: 01473 265054

Email:

neighbourhoodplanning@suffolk.gov.uk

Dear Mr. Rawlings, on behalf of Barrow parish council,

Pre-Submission version of the Barrow cum Denham Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Pre-Submission version of the Barrow cum Denham Neighbourhood Plan.

It is noted that SCC was initially missed off the official Regulation 14 consultation of this plan. It is assumed that other statutory consultees have also been notified of the consultation of this draft plan, as identified in the Neighbourhood Planning Regulations 2012,¹ and been given the opportunity to provide their comments.

SCC is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Health and Wellbeing
- Libraries
- Minerals and Waste
- Natural Environment
- Public Rights of Way
- Transport

This response, as with all those comments which SCC makes on emerging planning policies and allocations, will focus on matters relating to those services.

In this letter, we aim to highlight potential issues and opportunities in the plan and are happy to discuss anything that is raised.

Where amendments to the plan are suggested, added text will be in *italics* and deleted text will be in ~~strikethrough~~.

¹ <https://www.legislation.gov.uk/ukxi/2012/637/schedule/1/made>

Housing Strategy

SCC notes that the neighbourhood plan does not make reference to the site allocations of the emerging West Suffolk Local Plan.

SCC note the proposed site allocation as set out in Policy BCD2.

Policy BCD1 Patial Strategy states: “accommodate new strategic development in accordance with the designation of Barrow as a Key Service Centre in the Local Plan settlement hierarchy”.

SCC has made the assumption that this allocation is proposed in addition to the proposed site allocations of the emerging West Suffolk Local Plan, which includes two site allocations as part of the Preferred Options consultation, which was held in 2022.

It is believed that our colleagues at West Suffolk Council have made the same assumption.

SCC notes that Policy BCD1 Spatial Strategy also states: “all additional new windfall development will be primarily focused within the defined Village Settlement Boundary of Barrow.”

Policy BCD3 Non Strategic Housing Delivery also states: “[...] this Plan provides for small infill, or other brownfield redevelopments, to come forward for new homes, on suitable sites, within the defined village Settlement Boundaries of Barrow and Burthorpe.”

However, the neighbourhood plan does not include a map that clearly displays the Settlement Boundary. This could lead to ambiguity for planning decisions, about where the settlement boundaries lie. Therefore, it is strongly recommended to add a Settlement Boundary Map.

Whilst Figure 2 does include a settlement boundary, SCC notes that is from the 2015 Local Plan, and does not include the emerging proposed allocations (either from the Emerging West Suffolk Local Plan nor the draft Neighbourhood Plan), and therefore should be updated accordingly.

Archaeology

SCC welcomes that heritage has been given thought and consideration in the plan.

The plan includes a good historic background for Barrow in paragraph 3.45 - 5.52, and SCC particularly welcomes the inclusion of prehistoric activity in the area referencing the early origins of settlement here. This could be enhanced by a search of the Suffolk HER². The inclusion of an HER search in map format within this chapter would be a useful addition to show all heritage assets (above and below ground) in the area.

SCC welcomes that significant Listed Buildings in the area have been highlighted in paragraph 3.53-3.59 with signposting for more information.

² <https://heritage.suffolk.gov.uk/>

In Policy BCD3, SCC welcomes that the conversion of rural buildings for residential use has been included. It is recommended that adding that proposals for these conversions should be accompanied by a heritage statement.

Policy BCD11 - Protection of Local Heritage Assets

In Policy BCD11, part ii., it is recommended that the list of features should also include archaeological interest, as well as historic and architectural.

It is also suggested that Policy BCD11 would benefit from adding a section regarding below-ground heritage assets.

SCC would recommend the inclusion of the following additional text, in the supporting text of Policy BCD11:

“Suffolk County Council Archaeological Service (SCCAS) would advise that there should be early consultations of the Historic Environment Record (HER) and assessment of the archaeological potential of any potential development site at an appropriate stage in the design stage, in order that the requirements of NPPF and West Suffolk Local Plan are met. SCCAS as advisors to West Suffolk Council would be happy to advise on the level of archaeological assessment and appropriate stages to be undertaken.”

Inclusion of the above text would provide clarity to developers for any future development sites.

In addition to this, the plan could also highlight any level of public outreach and public engagement that might be aspired from archaeology undertaken as part of a development project, as increased public understanding of heritage sites is an aspiration of the NPPF. It would also be beneficial to include non-designated heritage assets which the Neighbourhood Planning Group may have identified (see below).

It is good to see an inclusion of a list of Listed Buildings and Scheduled Monuments in Appendix 1 within the area. In addition, it would be beneficial to include a list of any structures considered to be non-designated heritage assets which have been identified and to also identify any which could be suitable for listing. SCC Archaeological Service have been reviewing Farmsteads throughout Suffolk, as part of an ongoing project funded by Historic England. The Neighbourhood Planning Group may wish to consider whether the information from the Suffolk Farmsteads Project would add any details or information to the Non-Designated Heritage Assets within the area, entries from the project can be seen via the Suffolk Heritage Explorer.³ This could also help with Policy BCD3 concerning conversion of rural buildings some of which could be non-designated heritage assets.

Site Allocations

Land East and West of Barrow Hill - Any planning application should be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts. Geophysical survey in the first instance would inform on the scope and timing of intrusive trial trenched evaluation.

³ <https://heritage.suffolk.gov.uk/farmsteads>

Land at Bury Road - The proposed development area has been subject to geophysical survey and desk-based assessment. There is a need for a condition to secure a programme of archaeological work, commencing with trenched evaluation, to ground-truth the results of non-invasive survey and enable a mitigation strategy for any identified remains to be developed.

Land Off Denham Lane - Conditions may be required to secure a programme of archaeological work.

Education

SCC, as the Education Authority, has the responsibility for ensuring there is sufficient provision of school places for children to be educated in the area local to them. This is achieved by accounting for existing demand and new developments. SCC, therefore, produces and annually updates a five-year forecast on school capacity. The forecast aims to reserve 5% capacity for additional demand thus the forecasting below may refer to 95% capacity. The information below is to inform the Neighbourhood Planning Group's understanding of educational provision in the Plan Area and does not need to be included in the Plan.

Primary Education

The development proposed in Barrow has been challenging to plan for in terms of primary provision, there are three possible scenarios that could happen:

- Scenario 1 – The neighbourhood plan development comes forward, but the emerging local plan development does not
- Scenario 2 – The emerging local plan development comes forward, but the neighbourhood plan development does not
- Scenario 3 – The neighbourhood plan development and the emerging local plan development comes forward.

In our response to the emerging West Suffolk Local Plan, SCC have responded on the basis that the development proposed in the emerging West Suffolk Local Plan only does not provide a quantum of growth that will support a viable expansion of the primary school. SCC would normally expand primary schools based on a requirement at least an additional 105 places, but the proposed development in the emerging Local Plan would only result in around 55% of that need, thus leaving the expansion unsustainable for the school to manage going forward.

Similarly, if SCC consider the development proposed in the neighbourhood plan alone, this also does not provide a quantum of growth that will support a viable expansion of the primary school.

However, if both the neighbourhood plan and the emerging local plan development came forward, then SCC would then be in a stronger position to support expansion of the primary school. In the tables below you will find information that sets out the different scenarios to illustrate the situation.

Scenario 1 – Barrow Neighbourhood Plan Development Only

Location	West Suffolk Local Plan Policy Ref	Barrow Neighbourhood Plan Policy Ref	No. of dwellings	Estimated Primary Pupil Yield
Land at Barrow Hill		BCD2	170	43

	95% Capacity	Forecast 2027	Estimated Primary Pupil Yield from Proposed Development	Total Places Required (Forecast plus Pupil Yield)	Forecast Surplus / Deficit (95% Capacity less Total Places Required)
Barrow CEVCP School	196	210	43	253	-57

Scenario 2 – Emerging West Suffolk Local Plan Development Only

Location	West Suffolk Local Plan Policy Ref	Barrow Neighbourhood Plan Policy Ref	No. of dwellings	Estimated Primary Pupil Yield
Land off Bury Lane	3.01a		150	38
Land off Denham Lane	3.01b		15	4

	95% Capacity	Forecast 2027	Estimated Primary Pupil Yield from Proposed Development	Total Places Required (Forecast plus Pupil Yield)	Forecast Surplus / Deficit (95% Capacity less Total Places Required)
Barrow CEVCP School	196	210	42	252	-56

Scenario 3 – Barrow Neighbourhood Plan and Emerging West Suffolk Local Plan Development

Location	West Suffolk Local Plan Policy Ref	Barrow Neighbourhood Plan Policy Ref	No. of dwellings	Estimated Primary Pupil Yield
Land off Bury Lane	3.01a		150	38
Land off Denham Lane	3.01b		15	4
Land at Barrow Hill		BCD2	170	43

	95% Capacity	Forecast 2027	Estimated Primary Pupil Yield from Proposed Development	Total Places Required (Forecast plus Pupil Yield)	Forecast Surplus / Deficit (95% Capacity less Total Places Required)
Barrow CEVCP School	196	210	85	295	-99

In any case, as part of the emerging West Suffolk Local Plan, SCC are requesting a land reservation in an employment allocation adjacent to the school site (3.01d).

Secondary Education

The Neighbourhood Plan growth and West Suffolk Local Plan growth, individually or collectively, would be accommodated via the expansion of local secondary school provision.

Policy BCD8 – Support for new and existing community facilities

SCC notes that Policy BCD8 refers to the community support for an expansion of the primary school facilities. Please note that, as stated above, any expansion of the primary school is likely to only be feasible if the level of growth and housing is large enough to justify an expansion.

Flooding

SCC, as the Lead Local Flood Authority, has the responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. The Environment Agency has the responsibility for managing flood risk from main rivers and the coast.

SCC would suggest a small amendment to Policy BCD2 – Strategic Site Allocation: Land at Barrow Hill, as follows:

“vii. All surface water from the site to be drained via Sustainable Urban Drainage (SuDS) facilities located within the allocated area. Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site surface water drainage and water resources will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere.”

Health and Wellbeing

SCC welcomes the Health and Wellbeing, and Active Transport and Accessibility Objectives.

Adaptable homes and an ageing population

SCC welcomes the health and wellbeing data detailed in paragraph 3.30 and recommend this could

be enhanced by adding population data. The Suffolk Observatory⁴ website provides 2021 Census population data for Barrow of 2,592. Of these, 21.9% of residents are aged 65+ which is variably higher than the England average at 18.4%, tying in with paragraph 3.37. The data indicates a need for developments to be inclusive to the needs of an ageing population, with homes being adaptable and outdoor spaces being well lit, safe, easily navigable, and neurodiversity and dementia friendly.

It is important to ensure the needs of all residents are catered for, recognising the likely increase of co-morbidities as people get older.

SCC welcomes part iv) of Policy BCD5 Development and High Quality Design, stating the support for adaptable and accessible homes. This can help meet the needs of elderly and frail residents, allowing them to maintain independence for longer, but also allowing for younger occupants and families and SCC is supportive of this.

Chapter 12 Active Transport and Accessibility

SCC welcomes Chapter 12 and Policy BCD12 Active Transport and Accessibility.

SCC would suggest including the following additional wording into the first paragraph of Policy BCD12:

“[...] will be suitably mitigated by encouraging walking, cycling and other non-car modes, including public transport. Encouraging and facilitating active and sustainable travel can reduce vehicles on the road and therefore pollution and poor air quality, as well as improve mental and physical health. Proportionate investment in new footpath connections, [...]”

Access to open space, sports, recreation and community facilities

SCC notes paragraph 3.68 of the plan, which encourages improvements to health and wellbeing that can be achieved from access to sport and recreational facilities.

This paragraph is welcome, however the following minor amendment is suggested:

3.68 [...] The Parish Council however also wishes to encourage sustainable access to enhanced outdoor sport and recreation, where achievable, for the benefit of all the community, as set out in Policy BCD 9 of this Neighbourhood Plan. Access to open spaces can provide benefits to mental and physical health and wellbeing, giving opportunities for social interaction, space for recreation and habitat for wildlife

Libraries

SCC notes that the neighbourhood plan does not mention libraries. The mobile library service visits Barrow every four weeks and calls at three stops. The catchment library is Bury St Edmunds library which is currently 83% of the modal size for the population of 59,660 people. Investment is required from any development to reconfigure the library to increase usable floorspace, to add accessible toilets, and to enable library services to be delivered to meet the needs of the growing community.

⁴ <https://www.suffolkobservatory.info/population/reports/#/view-report/0e80000fe3664109b42bc3010a02ab7c/E05012766/G7>

SCC would therefore suggest that the importance of the library service is added to the plan, perhaps in Policy BCD8, with specific reference to there being a requirement for contributions to be made for library services from any development that takes place.

Minerals and Waste

Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means that SCC makes planning policies and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan,⁵ adopted in July 2020, which forms part of the Local Development Plan.

SCC welcomes the references in paragraphs 2.9 and 2.10 to the Suffolk Minerals and Waste Local Plan 2020.

Safeguarded Sites

For information, while safeguarded water treatment facilities are listed in paragraph 2.10 as safeguarded sites, there is one further safeguarded site within the parish boundary. The safeguarded site is outlined in the table below:

IWER2	Incinerator Without Energy Recovery	Suffolk Pet Crematorium
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In the case of the mentioned safeguarded sites and IWER2, Policy WP18 (Safeguarding of Waste Management Sites) of the Suffolk Minerals and Waste Local Plan 2020 will apply, a note in paragraph 2.10 stating this would provide clarity.

A partial segment to the north-west of the Denham parish boundary (although, none of the Barrow parish boundary) sits within the minerals safeguarding area as defined by Policy MP10 (Minerals Consultation and Safeguarding Areas) and as outlined on the Safeguarding and Proposals Map.⁶ This area can also be viewed on the Interactive Map of Waste Locations of Interest⁷ by enabling the “consultation area” overlay (this can be activated via the tab in the lower right corner). The above-mentioned site can also be viewed on this interactive map.

Natural Environment

Objectives

SCC welcomes the Built and Natural Environment Objectives.

Biodiversity

SCC welcomes Policy BCD10, in particular part i) which is supportive of proposals that

⁵ <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

⁶ <https://www.suffolk.gov.uk/asset-library/imported/minerals-and-waste-safeguarding-and-proposals-map-reduced.pdf>

⁷ <https://scc-planning.github.io/minerals-waste-map/>

provide a level of Biodiversity Net Gain above the minimum requirements.

SCC welcomes part vi) of policy BCD3.

It is suggested that more recommendations made in the Design Code for the parish with regards to trees, landscaping and biodiversity detail could have been incorporated into policy.

Open Space

SCC welcome Policy BCD2 part viii, which sets out the expectation for formal and informal public open spaces as part of a development. As noted in the blue text above BCD9.1, new housing development is covered in Policy BCD2, BCD3 and BCD4.

SCC would suggest that that the text from part viii) from Policy BCD2 is also incorporated into Policy BCD3 and BCD4, to ensure that there is the provision of new open spaces are of new developments.

Landscape Character

The Section about Local Landscape Context and Areas of Sensitivity does refer to the Suffolk Landscape Character Assessment and the Brecks Special Qualities report (pp.36-38), which is welcome.

Part v. and part vii. of Policy BCD4 – Special Needs and Local Affordable Housing as well as part ii. of Policy BCD5 – Development and High Quality Design aim to retain the rural landscape character around Barrow, Burthorpe and Denham, which is welcome.

Important Views

Key views are mentioned in part iv. of Policy BCD1 – The Spatial Planning Strategy and part vii. of Policy BCD4 – Special Needs and Local Affordable Housing.

Objective bullet-point 6 of the Built and Natural Environment states: “To maintain existing distinctive views and visual connectivity”, and paragraph BCD3.5 states: “The landscape setting of Barrow cum Denham and Burthorpe and any key views will also need to be carefully considered where proposals are located close to the settlement edges.”

SCC notes that the Design Guidance and Code which recommends the retention of views into the surrounding countryside (p.31). It does not appear that a Key View assessment was carried out; no important views have been identified or protected by policy, despite views being referred to frequently.

Therefore, there should be a clear assessment of Key Views, showing evidence and justification of each view that is deemed important.

These important views would also need to be clearly displayed on map and a Policies Map, to indicate where they are located and how they interact with the other features and services of the parish and the plan.

Without this information and a clear assessment of the views, it is not clear how the objective to protect views is supposed to be achieved, nor how a planning officer is supposed to make a decision

on whether a proposed development would have any impact on the “key views”, if they are not clearly displayed and evidenced.

Public Rights of Way

SCC notes that that policy BCD2 and BCD12 refer to “footpath linkages” and “footpath connections”, however, SCC would recommend that these are amended to read as “public rights of way” instead.

The classifications of Public Rights of Way are as follows:

- (1) Footpath;
- (2) Bridleway;
- (3) Restricted Byway; and
- (4) Byway Open to All Traffic.

There could be reference to other strategies that support this Neighbourhood Plan. This includes Suffolk County Council’s Green Access Strategy (2020-2030).⁸ 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.

Transport

SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe as well as providing and managing flood risk for highway drainage and roadside ditches.

SCC notes paragraph 2.28, to inform the LHA would not object to development that fronted private land if it were in accordance with planning policy.

SCC notes paragraph 2.29, to inform the LHA will not support any development which would have an adverse impact on highway safety within planning policy.

SCC welcomes the references to supporting and promoting Active Travel to help minimise the impact of development on the highway network.

SCC supports the chapter Policy BCD12 Active Transport and Accessibility.

SCC notes paragraph BCD12.4, to inform the LHA will consider and review all new development’s car and cycle parking in accordance with Suffolk Guidance for Parking 2023.⁹ Minimum car and cycle parking standards are required to ensure that the level of on-street parking demand is managed and to ensure that residents will be able to conveniently and securely store cycles.

⁸ <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/green-access-strategy>

⁹ <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>

SCC would recommend that Policy BCD5 – Development and High Quality Design should be amended as follows:

“The layout of new housing should not be road or parking dominated and should reflect the settlement pattern of the area, with high levels of pedestrian permeability, in accordance with the Suffolk Guidance for Parking 2023 and the Suffolk Design Streets Guide 2022 (or any successor documents). Proposals [...]”

Paragraph BCD12.4 should also make specific reference to the Suffolk Guidance for Parking 2023 (or any successor document).

SCC welcomes the measures to promote Travel Plans and the emphasis on improving public transport.

General

SCC would note that although the well-designed nature of this plan is supported, it does tend to follow form before function. SCC would raise that when Development Management officers are deciding whether to grant or refuse planning permission, with consideration of this Neighbourhood Plan, the lack of paragraph numbers in some instances (for example) may result in unnecessary delays or misinterpretations of references which could lead to negative outcomes.

There is a typographical error on page 51, within the introductory text for Policy BCD2:

“[...] including employment, to the west and east t of Barrow Hill, as set out in Neighbourhood Plan Policy, BDC2”.

Regarding the Glossary, County Councils are not local planning authorities, however, SCC has responsibilities including: minerals and waste planning authority, lead local flood authority, local highway authority, and education authority.

Paragraph 2.20 states Policy RV4 designates land at Barrow Business Park and "This employment site has not yet come forward and so is protected for its allocated purpose by relevant policies contained within this Neighbourhood Plan."

However, SCC notes that there is no specific mention of the business park in any policies of this neighbourhood plan, and as such the business park has not been protected for its allocated purpose, as stated.

Policies Map

The Barrow neighbourhood plan does not have a Policies Map. Whilst Figure 2 does display some of the relevant components of a policy map, it is not sufficiently detailed to be classified as the Policy Map for the plan.

It is strongly recommended that the plan creates a Policies Map, which clearly displays the important features mentioned within the plan policies in once clear and consolidated image.

This map should display the following: parish boundary, Settlement Boundaries, all allocated housing or development sites, open spaces, Listed buildings and/or heritage assets, important views, Public Rights of Way, and any other important features or facilities of the parish.

Inset maps may be used to show closer detailed parts of the parish, where identified features would be lost and/or hard to read on the overall Policies Map.

SCC also notes that Policy BCD4 states “as shown on the Proposals Map” in part ii), however there is not a Proposals Map included as part of the plan.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the SCC’s Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources.

The guidance can be accessed here: [Suffolk County Council Neighbourhood Planning Guidance](#).

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

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