

Why on earth would the parish council think that Barrow residents would want to see such excessive development? One possible answer is that they have been advised by Turley.

The preferred location for any new housing would be near the school, towards the A14 so that traffic through the village is kept to a minimum. That site would seem ideally suited to allow expansion of the school and improve traffic safety problems at school drop off and pick up times. In other words, ideally north of the village NOT south as proposed by the neighbourhood plan.

Locating such a large site to the south of the village will mean that much of the traffic will come through the village, past the school to or from the A14. This is a bad idea.

At least the traffic from Bury Road will not be so bad because the site is much smaller, some traffic will naturally go down Bury Road (which is rarely busy) to Bury and there are 2 bus stops there.

I also see that the proposed site is close to Wilsummer Wood. I believe this is a protected habitat and so it seems a bad idea to build so close by. Bury Road is much more distant and I am not aware that there would be any impact on protected habitats. I note that Bloor Homes are planning a wetland nature area which seems like a very positive idea.

The use of Turley as consultants demonstrates poor judgement by the parish council. I suggest that Turley have deliberately presented a long winded and overly complicated document on the basis of 'bullsh*t baffles brains'. It will be beyond many of the old folk to read and understand a 100 page document written in such an unhelpful fashion. If Pigeon are a major client then common sense should tell the parish council that Turley will be influenced by commercial pressure. One aspect of this would be to discourage feedback. Parish funds should only have been spent on a wholly independent consultant.

In conclusion, I strongly disagree with the neighbourhood plan. It is plainly a bad plan, poorly publicised, poorly presented and biased towards the landowners not the parish.

Kind regards,



17 October 2023

Neighbourhood Plan

I wish to object strongly to the Neighbourhood Plan.

I had previously felt that development in the southern part of the village would be most preferable, but I am persuaded by the very thorough and professional reports from Aecom that this is not as sustainable as development in other, more central parts of the village.

I cannot see a good reason why the PC has ignored Aecom's reports and chosen a less sustainable site – it simply does not make sense.

I am informed that if the Barrow Hill site is developed, the landowners will provide a new sports field at Barrow Hill. If this is the case, why is it not included in the Neighbourhood Plan? How will they play football on a hill? Besides, I do not think we need a new sports field – we have one already and it is not used that often. It would be better to improve the sports field and village hall that we have rather than using more land to build a new one.

The Barrow Hill site will cause too much traffic through the village.

We do not need any more offices or industrial units. I believe there is already planning permission for an industrial park north of the school. Since this would be close to the A14 this is a sensible location, rather than having lorries and HGVs traffic pass through the village and past the school where there would be an obvious safety hazard.

I think it's a cruel idea to put old people's homes in such remote locations. It would more sensible to locate old people's homes near the centre of larger villages or towns where the elderly are less isolated and could enjoy easy access to shops etc.

The site is not served by public transport.

The site would be highly visible from a surprisingly long distance. I was near Chevington recently and the site is visible from there, spoiling a beautiful view. I think this may be missing from Aecom's environmental report because the lines of sight are not obvious.

I have seen information from Bloor Homes regarding their site at Bury Road and I think this is a much better site because it is smaller and closer to shops etc. in the centre of Barrow. It is also close to the A14 and closer to public transport.

The division between Barrow and Burthorpe is illusory. One has only to walk along Bury Road to see that there is already no discernible difference or gap between Burthorpe and Barrow. Besides, the Bury Road site is to have an open area along most of its boundary with Bury Road which means that any threat of coalescence is negated.

The Denham Lane site is only for about 20 houses and the location would not impact Denham (which I believe is classed as countryside rather than a settlement).

The PC's inexplicable decisions may have something to do with the appointment of Turley who I understand work for the landowners of the site at Barrow Hill. This seems highly irregular since they are unlikely to offer wholly independent advice to the PC.



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Neighbourhood plan

1 message

17 October 2023 at 20:31



Dear Sir or Madam

I write to express my strong objection to the Neighbourhood Plan due to a number of factors:

The Plan is not supported by the evidence but rather contradicts it.

The proposed site is excessively large because it could fit more than twice the housing requirement of 170 houses. 97% of respondents in the parish questionnaire wished to protect the natural environment & green spaces around Barrow. The preferred site would build on an unnecessarily large greenfield site.

The parish questionnaire shows that 83% of respondents wished to see a minimum amount of development. However, if there had to be development, 55% of respondents chose the north west quadrant of the parish, nearer the main transport links so as to minimise traffic through the village. The proposed site is in the south east quadrant of the village – diametrically opposite and furthest away from the transport links. Given there are no bus stops in the south east quadrant, this will increase traffic through the village.

The Plan also proposes further office/industrial development. 81% of respondents to the parish questionnaire thought that Barrow-cum-Denham had sufficient business premises. Additional business premises are unnecessary given the planning allocation for Barrow Business Park and planning permissions for large offices at Barrow Hall and Green Farm, Barrow Hill. Moreover, the rise in home working has reduced demand for office development.

Policy BCD7 is alarming as it would allow the site to be used solely for housing, which would equate to 400+ houses.

The consultation states that the preferred site ‘has been carefully selected on the basis of an independent, comparative site analysis’. This is highly misleading as the expert report actually states that other sites are more suitable.

The expert report on site assessment found that the Denham Lane site was highly suitable:- “Development of the site therefore has potential to round off the settlement to the west while providing a defensible boundary to further risk of coalescence.” It is a small site and its elongated shape would not alter Barrow’s settlement boundary materially. The PC’s decision to reject this site on grounds of coalescence is irrational.

The expert environmental report shows that the Denham Lane and Bury Road sites are more suitable than the proposed site. The PC’s decision to reject the Bury Road site on grounds of coalescence is irrational because its site plan shows its north east portion as an open/green area. This negates any risk of coalescence. Notably, the Bury Road site has good public transport links given the bus stops along Bury Road at Sharpe’s Hill & Papeley Meadow (which have been omitted from the Plan’s map of amenities on page 26).

A convincing argument as to why the PC has disregarded expert advice and the parish questionnaire is absent from the Plan.

The owners of the preferred site used Turley consultants to promote their land to West Suffolk Council in the emerging Local Plan. The PC’s decision to use public money for the same consultants to write the Neighbourhood Plan is regrettable. On a matter such as this, independence is important and perception of independence even more so.

Kind regards





Barrow Neighbourhood Plan

1 message

17 October 2023 at 08:53



Dear Parish Council,

Please accept this email as a strong objection to the Neighbourhood Plan.

The Plan is not supported by the evidence but rather contradicts it.

The proposed site is excessively large because it could fit more than twice the housing requirement of 170 houses. 97% of respondents in the parish questionnaire wished to protect the natural environment & green spaces around Barrow. The preferred site would build on an unnecessarily large greenfield site.

The parish questionnaire shows that 83% of respondents wished to see a minimum amount of development. However, if there had to be development, 55% of respondents chose the north west quadrant of the parish, nearer the main transport links so as to minimise traffic through the village. The proposed site is in the south east quadrant of the village – diametrically opposite and furthest away from the transport links. Given there are no bus stops in the south east quadrant, this will increase traffic through the village.

The Plan also proposes further office/industrial development. 81% of respondents to the parish questionnaire thought that Barrow-cum-Denham had sufficient business premises. Additional business premises are unnecessary given the planning allocation for Barrow Business Park and planning permissions for large offices at Barrow Hall and Green Farm, Barrow Hill. Moreover, the rise in home working has reduced demand for office development.

Policy BCD7 is alarming as it would allow the site to be used solely for housing, which would equate to 400+ houses.

The consultation states that the preferred site 'has been carefully selected on the basis of an independent, comparative site analysis'. This is highly misleading as the expert report actually states that other sites are more suitable.

The expert report on site assessment found that the Denham Lane site was highly suitable:- "Development of the site therefore has potential to round off the settlement to the west while providing a defensible boundary to further risk of coalescence." It is a small site and its elongated shape would not alter Barrow's settlement boundary materially. The PC's decision to reject this site on grounds of coalescence is irrational.

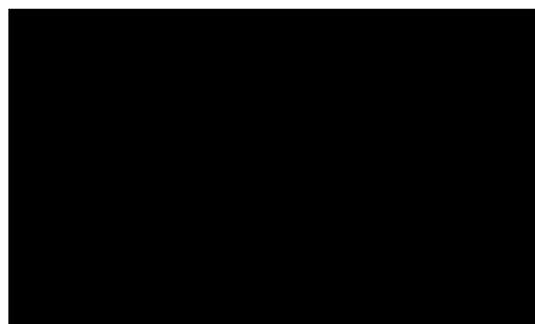
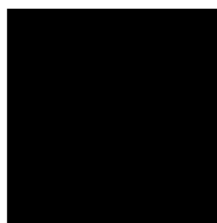
The expert environmental report shows that the Denham Lane and Bury Road sites are more suitable than the proposed site. The PC's decision to reject the Bury Road site on grounds of coalescence is irrational because its site plan shows its north east portion as an open/green area. This negates any risk of coalescence. Notably, the Bury Road site has good public transport links given the bus stops along Bury Road at Sharpe's Hill & Papeley Meadow (which have been omitted from the Plan's map of amenities on page 26).

A convincing argument as to why the PC has disregarded expert advice and the parish questionnaire is absent from the Plan.

The owners of the preferred site used Turley consultants to promote their land to West Suffolk Council in the emerging Local Plan. The PC's decision to use public money for the same consultants to write the Neighbourhood Plan is regrettable. On a matter such as this, independence is important and perception of independence even more so.

Kind regards







Neighbourhood Plan

1 message

19 October 2023 at 10:30

I disagree strongly with the Neighbourhood Plan.

Neighbourhood Plans are supposed to be community led and evidence based. Barrow-cum-Denham's Neighbourhood Plan is clearly neither.

The Plan is irrational, lacking in due process, contradicts the supporting evidence (for no good reason) and its policies have been drafted by a non-independent source without review by the PC prior to consultation.

The proposed site is excessively large. At 13.6Ha, it could fit more than twice the housing requirement of 170 houses. 97% of respondents in the parish questionnaire wished to protect the natural environment & green spaces around Barrow. The preferred site would build on an unnecessarily large greenfield site thus contradicting supporting evidence.

The report on the parish questionnaire is provided as supporting evidence. It shows that 83% of respondents want to see a minimum level of development. However, if there had to be development, 55% of respondents chose the north west quadrant of the parish, nearer the main transport links so as to minimise traffic through the village. The proposed site is in the south east quadrant of the village, diametrically opposite the parish's preferred location and furthest away from the transport links. Given there are no bus stops in the south east quadrant, this will increase traffic through the village. Accordingly, the Plan contradicts its own supporting evidence.

The Plan also proposes further office/industrial development. This is unnecessary and irrational given West Suffolk Council's allocation of Barrow Business Park and planning permissions for large offices at Barrow Hall and Green Farm, Barrow Hill. Moreover, the rise in home working has reduced demand for office development. Since 97% of respondents in the parish questionnaire wished to protect the natural environment & green spaces around Barrow, the preferred site would build on an unnecessarily large greenfield site thus contradicting supporting evidence.

Policy BCD7 is alarming as it would allow the site to be used solely for housing, which would equate to 400+ houses. Perhaps this has arisen as a result of having a non-independent source write the Plan's policies (see below) after site selection and for the Plan to be put to consultation without reviewing policies by the PC.

The consultation states that the preferred site 'has been carefully selected on the basis of an independent, comparative site analysis'. This is wholly misleading as the expert report actually states that other sites are more sustainable. This reflects poorly on the PC and is evidence of non-independence of the consultants appointed by the PC.

The expert report on site assessment found that the Denham Lane site was highly suitable:- "Development of the site therefore has potential to round off the settlement to the west while providing a defensible boundary to further risk of coalescence." It is a small site and its elongated shape would not alter Barrow's settlement boundary materially. The PC's decision to reject this site on grounds of coalescence is irrational.

The expert environmental report shows that the Denham Lane and Bury Road sites are more sustainable than the proposed site. The PC's decision to reject the Bury Road site on grounds of coalescence is irrational because its site plan shows its north east portion as an open/green area for a distance of roughly 150m along Bury Road. As well as providing valuable wildlife habitat for Barrow's protected great crested newts, this negates any risk of coalescence with Burthorpe. Notably, the Bury Road site has good public transport links given the bus stops along Bury Road at Sharpe's Hill & Papeley Meadow (which have been omitted from the Plan's map of amenities on page 26).

Other than spurious and unconvincing arguments on coalescence, a solid reason as to why the PC has disregarded expert advice and the parish questionnaire is absent from the Plan.

The PC Vice-Chair and the development company Pigeon used Turley consultants to promote their land to West Suffolk Council in the emerging Local Plan. The PC's decision to use public money for the same consultants to write the Neighbourhood Plan is regrettable. On a matter such as this, independence is important and perception of independence even more so.





Fwd: FW: Barrow cum Denham Parish Council Neighbourhood Plan

1 message



19 October 2023 at 13:37

Dear Barrow Cum Denham Parish Council,

Please accept this email as a strong objection to the Neighbourhood Plan.

The Plan contradicts the evidence and, in particular, the earlier parish questionnaire.

The proposed site is excessively large because it could fit more than twice the housing requirement of 170 houses. 97% of respondents in the parish questionnaire wished to protect the natural environment & green spaces around Barrow.

The questionnaire also shows that 83% of respondents wished to see a minimum amount of development. However, if there had to be development, 55% of respondents chose the north west quadrant of the parish, nearer the main transport links so as to minimise traffic through the village. The proposed site is in the south east quadrant of the village, furthest away from the transport links. Given there are no bus stops in the south east quadrant, this will increase traffic through the village.

The Plan also proposes further office/industrial development. This is unnecessary given the allocation of Barrow Business Park and planning permissions for large offices at Barrow Hall and Green Farm, Barrow Hill. Moreover, the rise in home working has reduced demand for office development.

Policy BCD7 is alarming as it allows the site to be used solely for housing, which would equate to 400+ houses.

The consultation states that the Plan is 'supported by an independent environmental report'. This is incorrect. The environmental report actually states that other sites are more sustainable.

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A convincing argument as to why the PC has disregarded expert advice and the parish questionnaire is absent from the Plan.

The owners of the preferred site used Turley consultants to promote their land to West Suffolk Council. The PC's decision to use Turley to write the Neighbourhood Plan is unfortunate. On a matter such as this, independence is important and perception of independence even more so.

Kind regards,



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Barrow cum Denham Parish Council Neighbourhood Plan

1 message

20 October 2023 at 21:19

Dear Barrow Cum Denham Parish Council,

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The questionnaire also shows that 83% of respondents wished to see a minimum amount of development. However, if there had to be development, 55% of respondents chose the north west quadrant of the parish, nearer the main transport links so as to minimise traffic through the village. The proposed site is in the south east quadrant of the village, furthest away from the transport links. Given there are no bus stops in the south east quadrant, this will increase traffic through the village.

The Plan also proposes further office/industrial development. This is unnecessary given the allocation of Barrow Business Park and planning permissions for large offices at Barrow Hall and Green Farm, Barrow Hill. Moreover, the rise in home working has reduced demand for office development.

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Kind regards,
[REDACTED]



Barrow cum Denham draft Neighbourhood Plan

1 message

20 October 2023 at 22:43



Dear [REDACTED]

I have spent some time reading through the draft NHP and have numerous questions on the content. I am commenting as a resident of the Parish. I attach a document which lists all my questions and, in appendices, gives further comment backed up by photographs in some sections.

I have also sent a text only version of the questions to the website feedback. I cannot attach photos to that website so I ask you to use the more detailed version, attached below, when you share feedback with the Parish Council.

Please confirm receipt before the deadline passes.

Best wishes



[REDACTED] - comments on NHP 19 Oct 2023.pdf

1402K

Introduction

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.

Questions

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 ?

Appendix 1 Errors and Omissions.

1. Pages 13 and 99. AECOM SEA publication date is June 2022 **not** September 2023. Some illustrations are in the wrong order. The illustration on page 13 is clearly June 2022 for AECOM.
2. Page 17 and others. The document is verbose and uses complex language. You should be aiming for a reading age of no more than 10 years.
3. Page 23. Typo in para 3.5. You mean *Bury Road* not *Barrow Road*.
4. Page 26. Map of services and facilities.
 - a. The bus stops on Bury Road/Papely Meadow have been left out. Why ?
 - b. The bus routes through Barrow are not shown. Why not ?
 - c. The Post Office has moved.
 - d. The café has closed.
 - e. The Garage opposite the Three Horseshoes is not shown.
5. Page 33. Para 3.41 "*Work undertaken by AECOM.....only 12% should have four or more bedrooms*" is immediately contradicted in the briefing notes "*25-35% of new homes will have four or five bedrooms*". Who are you trying to fool ? This is a hidden change of specification to permit up to three times as many large houses. Will this increase the profits for landowners and developers ?
6. Page 39. Para 3.70 is misleading. The true figure is 75% of respondents agreed or strongly agreed that Barrow-cum-Denham has sufficient sports & leisure facilities.
Page 39. Para 3.71 is unfounded speculation with no supporting evidence. Please remove this speculation unless you have sound supporting evidence.
7. Page 46. Site selection.
 - a. Para 4.9 "*on the basis of an independent, comparative site analysis, using an appropriate and objective site selection methodology*" is not true. The objective advice from AECOM and the Parish Council's own objective scoring was ignored. See appendix 4: Site Selection.
 - b. Para 4.10 Barrow Hill is not a "*Single Site*". It is hybrid of three separate sites on both sides of the road put together by three separate land owners. It will need at least two new road access points.
 - c. The draft plan makes no reference at all to the other sites considered for selection. What are you trying to hide ?
8. Page 51 Policy BCD2.7 "*.....to facilitate remote working*" is directly contradicted in the briefing notes "*....around 5% of 170 new homes to incorporate provision for home working*"
9. Page 52 Concept plan. The "*Pedestrian/Cycle link*" shown is the **current** cycle path. There is no plan for any new link visible on this map.
The "*PROW*" probably means *Public Rights of Way*. These are not suitable for cycles, pushchairs, wheelchairs or pedestrians without sturdy walking boots. You have presented an illustration which contradicts the very Policies you have written into the Plan.
10. Pages 46, 49, 51, 55 and 59 refer to Policies prefixed by '*BD*' not '*BCD*'. Please proof read the next version of the Plan.
11. Whole document.
The dates and sources of demographic data are missing.
At least 137 homes in Barrow have been sold since the July 2020 consultation. When will their occupants be consulted ?

Appendix 2 BCD12 and BCD8. Cycling, walking and buses. A fantasy project.

BCD12 is not focussed on linking the centre of Barrow to all the facilities.

2.1 The draft plan recognises the importance of cycling and walking for many reasons.

- Health and wellbeing.
- Encouraging public transport use.
- Safe walking and cycling.
- Improving access to services and facilities.
- Minimising motor vehicle contributions to climate change.

The draft plan makes 13 references to support these highly desirable objectives.

2.2 Climate change

The rapidly deteriorating climate change will soon force governments to introduce draconian changes to private transport. Driving a car for 10,000 miles burns 1135 litres of fuel (at 40 mpg). It's about the same amount as the oil burnt in your central heating boiler. The current BCD12 is all about linking only one new development to the village.

2.3 The cycling and walking project is a fantasy.

- NONE of the facilities and services, page 26, are accessible by the "*Pedestrian/cycle Link*".
- How did the Parish Council and a professional Planning Company fail to spot this oversight?
- BCD12 should start in the centre of the village and work outwards.
- Page 71. *Consideration will be given to how new facilities can complement and enhance the existing provision. New facilities should be located in a way that is able to maximise accessibility by foot or cycle and the co-location of facilities and adaptable buildings will be supported.* BCD8.5 Really ?
- Page 86. The cycleways will not reduce or mitigate the commuter traffic to Cambridge, Newmarket and Bury. Would anyone consider commuting to Cambridge by bicycle ?

2.4 What is the problem ?

Much of the centre of Barrow has public land ideally suited for cycle/pedestrian ways. But only The Street and Watsons Way are in direct contact with it.

The pavement on Barrow Hill is too narrow for pedestrians to pass without stepping into the road. It is too narrow for wheelchairs and cycles. See attached photos for detail.

New housing on Barrow Hill will add a large number of short car journeys into the village for school runs and shopping. This is why the Barrow Hill site has the worst impact on climate change.

See the 'Get out clause' on page 86 "*...pedestrian safety and local cycle routes will be expected.*" "Expected" is not the same as "Delivered".

2.5 What about bus service 312 ?

It has an infrequent and confusing schedule. It has three different routes through the village. These vary according to the day of the week, time of day and school holidays. It is so confusing that I am surprised anyone manages to take the bus to Bury or Newmarket. Have you ever used this bus ? Some bus stops are not even marked on page 29. This shows how low you prioritise bus travel.



2.6 Barrow Hill looking North showing how narrow the pavement and road are. The HGV has to cross the midline to avoid the pedestrian.



2.7 Pedestrian on Barrow Hill
Too narrow for wheelchairs or cycles.



2.8 The cycle way ends 20m short of Johnson Road. You must now cross the road.

Appendix 3 BCD2 BCD4 Is it a Care Home or a Bungalow ?

3.1 A previous Care Home proposal

On 2nd March 2020 the Parish Council Meeting learnt of 'Strawberry Care' a company wishing to build a care home in the vicinity of Ley Road. Weekly charge £1,250. Why did this plan come to nothing?

3.2 This new Care Home is an add on feature, over and above the 170 houses.

It is part of the additional benefits to the village included in the Barrow Hill site package. See *Policy BCD2 "an appropriately located and scaled Care Home.... "*

It all sounds very nice, but.....

3.3 Is it viable in Barrow ?

The Care Home proposal should not be included in the neighbourhood plan until we have seen a professional analysis of viability. It is misleading to imply it will be delivered on current evidence.

1. It will cost many millions of pounds to build.
2. Can you find 70 people who can afford over £1,000 per week each to reside in the Home?
3. Can you staff it ? This will be challenging in a rural setting with no public transport.
There are substantial staff vacancies in the care home industry.
4. Where is the specimen business plan and financial viability test ?
5. Have the local GPs agreed to service it ?
6. I do not think the authors of the draft plan have really grasped the challenges.

3.4 What is the catch ?

1. All mentions of the Care Home come with a "get out clause" to build some bungalows instead, not a care home.
2. Bungalows have, and never will be, a substitute for a Care Home.
3. Including the concept of a Care Home in this Neighbourhood Plan will allow a future planning application to claim it has support from the community thus bypassing an important planning step.

3.5 Another get out clause to torpedo the Care Home plan and its location

Page 59. Special Needs and Local Affordable Housing

BCD4.1 New development proposals to accommodate elderly and/or other vulnerable groups should demonstrate evidence of local need, primarily from within the Neighbourhood Plan area, that cannot be reasonably met on a suitable, alternative, non-rural, site. All special needs proposals, located outside of the Settlement Boundaries, will be considered on their own individual merits, and will be supported in principle, subject to meeting all of the relevant criteria of Policy BD4.

Who wrote this verbose confusing paragraph? This means that a care home can only be built on the Barrow Hill site if all other possible sites within Barrow have been deemed unsuitable. This can be interpreted in many ways. This needs to be rewritten in Plain English.

3.6 Further information

I can provide a detailed description of the facilities and services expected of a Care Home, if requested. It is too lengthy to include with this reply.

Appendix 4 BCD2 Site Selection.

4.1 Is it a policy or a proclamation ?

Surely the Policy should be to consider all options. Then select a suitable site, rather than a proclamation of a site chosen by only four people with no supporting objective evidence.

4.2 Objective evidence.

The site selection is justified on Page 46 by

BCD4.9 “.....has been carefully chosen on the basis of an independent, comparative site analysis, using an appropriate and objective site selection methodology. “ This is not true. The objective evidence favoured the Bury Road site.

No mention is made of any of the other four development site options.

West Suffolk Council’s preferred site is not included in the discussion.

There are two objective pieces of evidence.

1. AECOM’s Strategic Environmental Assessment, June 2022.

Bury Road came top in five of the eight domains examined. Barrow Hill came top in only three – *Landscape, Historic Environment and Land Soil & Water.*

2. The Parish Council’s own objective scoring.

At the PC meeting of 18th October 2022, Bury Road scored 28.5 points. Barrow Hill came third with 23 points.

4.3 Voting to over-rule objective evidence.

Four councillors voted for the Barrow Hill site and one for Bury Road. So we have ended up with the Barrow Hill site on the basis of only four out of 2,501 residents voting for it. Is this fair ?

To my knowledge, the councillors who voted for Barrow Hill have not provided any objective evidence to support their voting decision. The parish residents were not consulted on this selection.

4.4 Professional advice. Site financial viability appraisals not done.

In September 2021 AECOM advised as follows

Viability

6.11 The Parish Council should be able to demonstrate that the sites are viable for development, i.e. that they are financially profitable for the developer. It is recommended that the Parish Council discusses site viability with West Suffolk Council. It is further suggested that any landowner or developer promoting a site for development should be contacted to request evidence of viability, e.g. a site financial viability appraisal.

Has the Parish Council demonstrated financial viability for any of the sites and any of the ‘benefits to the village’?

Appendix 5 BCD11 Listed Buildings and local heritage assets. Policy not needed.

5.1 How are these assets currently protected ?

Existing Planning regulations already give Listed Buildings extensive protection.

The Parish Council already has a statutory requirement to comment on all planning applications in the Parish.

BCD11 could be seen as scaremongering. Raising the possibility of damage or destruction of listed buildings and blotting the landscape – but not a real risk.

5.2 The setting of listed buildings in Barrow. Two questions must be considered:

1. The view **OF** the listed buildings from public land or rights of way.

Will the new houses impair the view **OF** the listed buildings and their back drop ?

No. Existing views will be preserved.

Tall trees and hedges already restrict views of these buildings and surroundings.

2. The view **FROM** the listed buildings.

This applies only if the public have access to the listed building, e.g. The Weeping Willow.

Will the new houses impair the view **FROM** the listed building?

No. Existing views of The Green, the Truck Store, Telephone Exchange and Mobile Phone Mast will be preserved.

Tall trees, hedges and holiday lodges already restrict views from this building.

5.3 In conclusion.

I do not think we need a special policy on Local Heritage sites because they are already protected by statutory legislation.

None of the sites proposed for new houses will have any impact on the listed buildings of Barrow.

I attach relevant photographs of the terrain in question.

Listed building on Bury Road is screened from 'BD13 site' by tall trees and hedge



5.4 View East along Bury Road towards Burthorpe

Listed building on Bury Road is screened from 'BD13 site' by tall trees and hedge



5.5 View West along Bury Road towards Barrow



5.6 Telephone Exchange and Phone mast on East side of Weeping Willow



5.7 View from public footpath looking North towards Weeping Willow



5.8 Historic setting of Weeping Willow and Truck Store

Appendix 6 Viability test. Will the benefits really be delivered ?

Please come clean on these issues and demonstrate to the residents of the Parish which of these benefits are viable and will actually be delivered.

6.1 Is the draft Neighbourhood Plan realistic and viable?

The plan introduces many developments and excellent aspirations for the village. The only guarantee is the number of new houses: 170.

The add on benefits to the village are wishes, not cast iron promises.

6.2 Which benefits are we talking about ?

1. Cycle ways/paths	Undeliverable
2. Pavement improvements	Lacks detail
3. Footpath upgrades	Possible
4. Care Home	Unlikely
5. Sports Facilities	Insufficient detail
6. Play areas	Possible
7. Public transport	Needs more detail
8. Medical services	Not explored
9. School improvements	Possible

6.3 the detail in the draft neighbourhood plan exposes poor preparation.

I quote two examples of poor planning.

- a. The last presentation by Pigeon in the Village Hall showed sports pitches on the side of Barrow Hill. The OS contour map shows a gradient with a drop of more than 10 metres at this location. Is this really going to happen ?
- b. The management and funding arrangements for the sports and community facilities are very vague. If the landowners agree to take on these tasks, how long will it last ? What happens when they die or become unable to manage ? There is a real danger of adding substantial costs to the Parish Council.

6.4 Has the reader been misinformed ?

A casual reader of the draft Neighbourhood Plan could be forgiven for thinking all these benefits will come if they vote in favour of the plan. On present evidence, I disagree.

Appendix 7 BCD3 Non-strategic Housing delivery. An example of bias.

7.1 Where did this policy come from ?

I was not aware that this was a problem for the parishioners. Surely it will benefit only a small number of residents i.e. the owners of redundant or disused rural buildings. It will bypass the restriction on building new homes outside the village settlement boundary.

7.2 What are we talking about ?

Page 55 Non-Strategic Housing Delivery

BCD3.3 In addition, proposals for the conversion of redundant or disused rural buildings, including agricultural barns for residential use outside of the defined Settlement Boundaries of Barrow and Burthorpe, will also be supported in principle, where they meet all of the relevant criteria of Policy BD3, as set out below:

7.2 What does this mean ?

That's a green light for any farmer wanting to do a barn conversion or other housing project involving other redundant agricultural buildings. It would bypass some planning questions such as "Have you consulted local residents?".

Inclusion of this policy in the neighbourhood plan is giving the farming community a big advantage which is not being offered to other residents.

**Barrow cum Denham Parish Council Neighbourhood Plan**

1 message

21 October 2023 at 10:41

Dear Barrow Cum Denham Parish Council,

Please accept this email as a strong objection to the Neighbourhood Plan.

The Plan contradicts the evidence and, in particular, the earlier parish questionnaire.

The proposed site is excessively large because it could fit more than twice the housing requirement of 170 houses. 97% of respondents in the parish questionnaire wished to protect the natural environment & green spaces around Barrow.

The questionnaire also shows that 83% of respondents wished to see a minimum amount of development. However, if there had to be development, 55% of respondents chose the north west quadrant of the parish, nearer the main transport links so as to minimise traffic through the village. The proposed site is in the south east quadrant of the village, furthest away from the transport links. Given there are no bus stops in the south east quadrant, this will increase traffic through the village.

The Plan also proposes further office/industrial development. This is unnecessary given the allocation of Barrow Business Park and planning permissions for large offices at Barrow Hall and Green Farm, Barrow Hill. Moreover, the rise in home working has reduced demand for office development.

Policy BCD7 is alarming as it allows the site to be used solely for housing, which would equate to 400+ houses.

The consultation states that the Plan is 'supported by an independent environmental report'. This is incorrect. The environmental report actually states that other sites are more sustainable.

The expert report on site assessment found that the Denham Lane site was highly suitable:- "Development of the site therefore has potential to round off the settlement to the west while providing a defensible boundary to further risk of coalescence." It is a small site and its shape would not alter Barrow's settlement boundary materially. The PC's decision to reject this site on grounds of coalescence is irrational.

The expert environmental report shows that the Denham Lane and Bury Road site on grounds of coalescence is irrational because the plan for the Bury Road site shows its north east portion as an open/green area. This negates any risk of coalescence with Burthorpe. Notably, the Bury Road site has good public transport links given

the bus stops along Bury Road at Sharpe's Hill & Papeley Meadow (These have been omitted from the Plan's map of amenities on page 26).

A convincing argument as to why the PC has disregarded expert advice and the parish questionnaire is absent from the Plan.

The owners of the preferred site used Turley consultants to promote their land to West Suffolk Council. The PC's decision to use Turley to write the Neighbourhood Plan is unfortunate. On a matter such as this, independence is important and perception of independence even more so.

Kind regards,



Fwd: Barrow cum Denham Parish Council Neighbourhood Plan

1 message

21 October 2023 at 11:25

> Dear Barrow Cum Denham Parish Council,

>

> Please accept this email as a strong objection to the Neighbourhood Plan.

>

> The Plan contradicts the evidence and, in particular, the earlier parish questionnaire.

>

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>

> The expert environmental report shows that the Denham Lane and Bury Road sites are more sustainable than the proposed site. The PC's decision to reject this site on grounds of coalescence is irrational because the plan for the Bury Road site shows its north east portion as an open/green area. This negates any risk of coalescence with Burthorpe. Notably, the Bury Road site has good public transport links given the bus stops along Bury Road at Sharpe's Hill & Papeley Meadow (These have been omitted from the Plan's map of amenities on page 26).

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> Kind regards,

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Response Neighbourhood Plan -Strongly Disagree

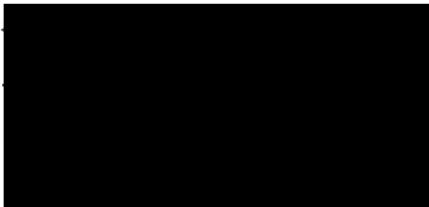
1 message

21 October 2023 at 11:31



Please find attached my response showing strong disagreement to the draft Neighbourhood Plan.

Regards



 **Barrow NP Response_Oct23.pdf**
349K

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 undoubtably 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.



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Cllr Jane Steer has taken the minutes for several PC meetings, as recent as 15th 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.

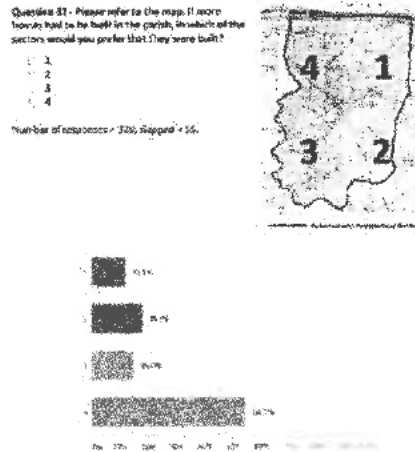
I have attended numerous PC meetings and I can confidently state that I have never witnessed either Cllr Jane Steer or Cllr Peter Wesley been asked to leave the room when matters relating to the NP or site selection have been discussed, which I would suggest places these individuals in a favourable position 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 William 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 03rd 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



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 minutes under item 6111 and 25th August 2022 item 6152:

"WSC warned 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 8.60 hectares
- BD8 Land South of Barrow Forge 1.41 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 descope'd 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
- New employment areas
- New sports facilities / 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 not 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 belief 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 suitably 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 NP, 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"

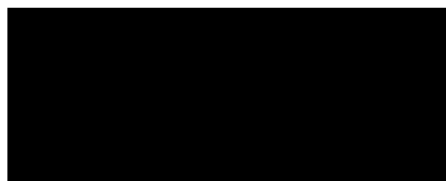
"conversion of existing agricultural buildings to other appropriate development uses"

"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 ~~be~~ 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"



Date: 21st October 2023

**OBJECTION to Barrow Hill Development**

1 message

21 October 2023 at 16:28

To all members of the Barrow Parish Council,

I strongly object to the development that is being considered along Barrow Hill, on the South of the village.

These are my concerns:

- 1. Neighbourhood Plan policies have not been agreed and considered before site selection.** This demonstrates both a lack of consideration to the neighbourhood as well as poor planning. A new development (housing with or without a Business Park) must be tailored to the village or town to ensure that it meets the specific requirements of that village / town. The policies therefore have to be agreed before the site is selected. This ensures that the policies, and therefore the neighbourhood, remain the priority. The policies have not been agreed in this case, indeed they have only recently been written, by a biased party.
- 2. The Plan is neither community led nor is it evidence based.** The results of the parish questionnaire and the expert reports from AECOM contradicts the Plan. The Plan is being led by a small group of Councillors with minimal engagement of the parish. It is clearly evident therefore that the Parish Council have made minimal efforts to engage and consider their community, their parishioners. The minutes of the Parish Council were published late, there has been minimal communication with the parishioners in the form of pamphlets (less than 100 flyers distributed) and social medial postings (one post).
- 3. The parish's preferred location is the North of the Village. The Parish Council have not fought for this.** They have also not made appropriate representations to West Suffolk Council regarding the settlement boundary or West Suffolk's policy DM29 regarding rural exception sites which might have enabled its development.
- 4. No clear or logical reason to contradict expert advice and the parish questionnaire is evident.** There is a spurious reference to coalescence (see below) but otherwise, the Plan makes no reference or justification on why the Parish Council has made the decision of the preferred site, over evidently more suitable sites (as evidenced by the export reports – see point below), that also are preferred by its parishioners.
- 5. The traffic has not been considered by the Parish Council.** Traffic is one of the parishioners' main concerns, as demonstrated by the Parish Council's questionnaire. The Barrow Hill site is at the far end of the village from the A14 and is further away from the school. Development of the Barrow Hill site would significantly increase the traffic load through the middle of the village, particularly at rush hour. The roads are narrow, with stretches of thin pavement where children and parents walk to and from school. This will increase the risk of accidents occurring. In addition, at this time, the road works that occur on a regular basis in order to maintain the road surface, already cause significant disruption. Increased traffic flow will make this untenable.

6. Expert opinion clearly shows that the Barrow Hill site is not as sustainable as other sites. The expert reports by AECOM show that the site is not considered as suitable as Denham Lane or Bury Road. Other than spurious reasons regarding coalescence (see below), there is no solid reason for ignoring expert advice and choosing a less sustainable site. Notably, the additional sporting facility promised by the landowners as part of their discussions with the PC is not included in the Plan and I believe there are no legal undertakings in place for them to be delivered. There is little confidence therefore that it will therefore be delivered. A hill side is unsuitable ground for football, rugby and cricket pitches. Major earthworks would be required for this to occur. The site proposed by the Plan is not supported over and above other sites by independent reports.

7. The Bury Road site was wrongly dismissed by the Parish Council. Bury Road site plans show a large open area at the north east of the site. The built portion of the site adjoins Bury Road for roughly 100m thus avoiding coalescence by roughly 150m. Parish Council Records show that the site was disregarded by the Parish Council because of coalescence. The historical impact assessment of the site contains errors which, once corrected, will further boost the site's sustainability ranking over Barrow Hill. Most importantly, the Bury Road site has good access to public transport with several bus stops nearby. Traffic would not nearly be as damaging as that from Barrow Hill since traffic to/from Bury would naturally use Bury Road.

8. Denham Lane site was wrongly dismissed by the Parish Council. The site is small and its elongated shape (with its long edge along the Barrow settlement boundary) means that it does not coalesce with Denham End. Notably, Denham End does not have a settlement boundary as it is classified as countryside by West Suffolk. The site was assessed as highly suitable by independent experts, AECOM.

9. The Barrow Hill site is excessively large. The site could accommodate 400+ houses which is more than double Barrow's housing requirement. In addition, the inclusion of a large employment area is unfounded given:

- a. a site for a light industrial/office area (Barrow Business Park) has already been allocated near the school
- b. planning permission is already granted for large offices at Barrow Hill (DC/18/0252/FUL)
- c. planning permission is already granted for substantial offices at Barrow Hill (DC/20/1396/FUL)
- d. demand for office space is much reduced due to home working
- e. the absence of any public transport to an employment area.

10. Development at Barrow Hill may be in addition to sites in West Suffolk's Local Plan but this was not included in the consultation material. West Suffolk Council have informed the Parish Council that the Neighbourhood Plan sites may be chosen in addition to those already chosen in West Suffolk's emerging Local Plan. Importantly, this key piece of information has been omitted from the consultation. This indicates a biased approach – particularly given the Plan's authors (see below).

11. Site selection process was unfair. The Parish Council provided important data about the Neighbourhood Plan to one landowner (the Parish Council Vice-Chair) and not others (see PC Minutes of Nov. 2021). Importantly, the Parish Council Vice-Chair did not declare her interest at various Parish Council Meetings. She also took part in meetings where she did declare an interest by taking the minutes. She did not withdraw from Parish Council Meetings when the agenda item relating to her interest was discussed and therefore did not comply with the Parish Council's Standing Orders on Code of

Conduct & Dispensations Section 13 dated March 2021. There is no record of the Parish Council Vice-Chair being granted a dispensation not to withdraw from relevant PC Meetings.

12. The Plan has been written by experts whose interests align with the landowners, not the Parish. The Parish Council chose Turley's Cambridge Office to write the Plan. They have carried out 30+ projects for one of the landowners who is also a founding director of the developers, Pigeon. It is naïve to think that the consultants will not be biased towards the commercial interests of a major client over the Parish. This bias is demonstrated by the inference that the employment areas could be converted to housing (the loophole evident in Policy 7), inaccuracy (missing the Bury Road bus stops on the amenities map), the misleading description of the Parish Council's sporting facilities.

13. Due process has not been followed: This is evidenced by:

- a. the declarations of councillors' interests;
- b. providing Neighbourhood Plan information to one landowner but not others;
- c. not agreeing policies before site selection;
- d. the use of personal preference (statement from Cllr. Ford at PC AGM) rather than evidence in voting and
- e. the use of non-independent experts to write policies.

Your sincerely,



Barrow Parish Council Neighbourhood Plan

1 message

21 October 2023 at 16:53

Dear PC,

I have serious objections to the Neighbourhood Plan as follows:-

1. The site appears to be very large, as it could accommodate 400+ houses, which is more than double Barrow's housing needs. Moreover, the inclusion of a large employment area does not make sense given:
 - a. a site for a light industrial/office area (Barrow Business Park) has already been allocated near the school
 - b. planning permission is already granted for large offices at Barrow Hill (DC/18/0252/FUL)
 - c. planning permission is already granted for substantial offices at Barrow Hall (DC/20/1396/FUL)
 - d. demand for office space is much reduced due to home working
 - e. the absence of any public transport to an employment area
2. The PC has not given due consideration to traffic. I am sure that the PC's questionnaire will show that traffic in Barrow is an important issue for parishioners. Compared to other possible sites, Barrow Hill's size & position (away from the A14) mean that it will generate most traffic through the village and past the school.
3. I understand that the PC have not fought for the parish's preferred location, north of the village, and have not made appropriate representations to West Suffolk Council regarding the settlement boundary or West Suffolk's policy DM29 regarding rural exception sites which might have enabled its development.
4. I am concerned that the Neighbourhood Plan is not community led or evidence based and I understand that it contradicts the results of the parish questionnaire and the independent expert reports from AECOM. Moreover, a clear reason to contradict expert advice and the parish questionnaire is not evident and the Neighbourhood Plan is silent on why the PC has made decisions of the preferred site over more suitable sites. Expert opinion clearly shows that site is not as sustainable as other sites and the reports by AECOM show that the site is not considered as suitable as Denham Lane or Bury Road. I believe that both of these sites have been wrongly dismissed:
 - a. The Denham Lane site does not coalesce with Denham End. Notably, Denham End does not have a settlement boundary as it is classified as countryside by West Suffolk. The site was assessed as highly suitable by independent experts, AECOM.
 - b. The Bury Road site plans show a large open area at the north east of the site and the built portion of the site adjoins Bury Road for roughly 100m thus avoiding coalescence by roughly 150m. PC Records show that the site was disregarded by the PC because of coalescence. I understand that AECOM's positive assessment of the site is not as positive as it should be and that changes to the historical impact assessment of the site will further boost the site's sustainability ranking over Barrow Hill.
5. I am concerned that the Neighbourhood Plan is being led by a small group of Councillors and engagement with the parish has been kept to a minimum. In addition, it appears that the site selection process was unfair, given that the PC provided important data about the Neighbourhood Plan to one landowner (the PC Vice-Chair) and not others, and that the PC Vice-Chair did not properly declare an interest at PC meetings. More seriously, the Neighbourhood Plan has been written by experts whose interests might appear to align with the landowners, not the Parish, given the connection between Turley's Cambridge office and one of the landowners (also a founding director of developers).
6. It is problematic that the development at Barrow Hill may be in addition to sites in West Suffolk's Local Plan, and I believe that this was not included in the consultation material. I understand that West Suffolk Council have informed the PC that the Neighbourhood Plan sites may be chosen in addition to those already chosen in West Suffolk's emerging Local Plan.
7. It is also problematic that the Neighbourhood Plan policies were not agreed prior to site selection. The implication is that policies could have been written to suit the site and I understand that the policies have only recently been written by Turley.

Best Regards,



Response to Public Consultation -Barrow-cum-Denham Neighbourhood Plan

1 message

22 October 2023 at 19:39

To whom it may concern,

I object strongly to the Barrow-cum-Denham Parish Council [PC] Neighbourhood Plan [NP]. The reasons are:-

1. The PC Vice-Chair did not declare her interest, as a landowner at Barrow Hill, at various PC Meetings including 14-10-2021, 1-11-2021, 7-3-2022 & 4-4-2022. The PC Vice-Chair attended these meetings but did not declare an interest.
2. The NP site selection process gave preferential treatment to one landowner - the PC Vice-Chair - over other landowners. Minutes of the PC Meeting from 1-11-2021 state "Cllr Steer has joined the NP Sub Committee. Cllr Kronbergs to forward all relevant documentation to her." The PC did not provide the same documentation to other landowners. This, and any other information she received relating to the NP that other landowners did not receive, gave the PC Vice-Chair an unfair advantage over other landowners.
3. The PC Vice-Chair took part in relevant aspects of PC Meetings (when she had declared an interest) such as the 2023 PC AGM, by taking minutes or proposing or seconding Minutes which related to her interests.
4. The PC Vice-Chair did not declare a relevant, commercial relationship with another landowner. In December 2020, Land off Barrow Hill was submitted as part of West Suffolk Council's [WSC] Call for Sites in the emerging Local Plan (LP). Notably, the submission is a Turley document and is available from WSC's web-site. The relationship is evident from page 2 of the submission:- "*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.*" The similarity and relevance to the NP is clear.
5. The NP has not selected the most sustainable site (according to supporting documentation) and the reasons for this are unclear, absent or irrational.
6. NP Policies were not developed & approved by the PC prior to site selection. This is an important procedural error. PC Meeting Minutes show no record of policies being approved before site selection. Rather, PC Minutes show that NP policies were drafted following site selection to suit the preferred site (see Turley Scope of Work in PC Minutes).
7. Rejection of the Denham Lane site is irrational. The PC rejected this site as it would 'close the gap between Barrow and Denham'. The Denham Lane site is a small site (0.66Ha), suitable for around 20 dwellings and its shape means that erosion of any green space between Denham and Barrow is minimal. Notably, the site has been selected by WSC.
8. At 13.6Ha (+ potentially 5Ha for sports & recreation grounds), the preferred site is unnecessarily large to accommodate the housing requirement of 170 houses for Barrow. 13.6Ha could house 400+ houses at 30 dwelling per Ha. The PC has failed to give due consideration to the protection of green space and the environment, contrary to parishioners' views shown in the PC's own Report on Parish Questionnaire.
9. By selecting a site south of the village, the PC has failed to give due consideration to traffic which would have to travel through all the village to the main access routes.
10. The provision of additional sports & recreation facilities to support the NP's selection of less sustainable site is irrational and contradicts supporting evidence. Question 15 of the Parish Questionnaire showed that 74.9% of respondents, agreed or agreed strongly that Barrow-cum-Denham had sufficient sports & leisure facilities. Question 25 of the Questionnaire showed that 77.7% of respondents agreed or agreed strongly that Barrow-cum-Denham had sufficient play areas for children.
11. Important information about WSC's emerging LP has been omitted from the Consultation. PC Minutes show that WSC has notified the PC that if the NP selected sites in addition to those already selected by WSC's emerging Local Plan, that these might be considered in addition to, rather than

instead of the NP's preferred sites. This important information has been omitted from the Consultation.

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 The Weeping Willow Public House or Barrow House.

13. The NP site selection has failed consider the Bury Road Site properly. The NP 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 NP and supporting Regulation 14 information has been drafted by a non-independent source and their selection by the PC indicates bias. It is remarkable that of the dozens of UK planning consultants able to carry out the NP work, that the same consultants as used by Barrow Hill landowners/Pigeon and PC Vice-Chair have been chosen by the PC. 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 interest of the Barrow parishioners.

15. Procedural propriety has not been observed in the use of public money to pay NP advisors. PC Meeting Minutes including those from 5 December 2022 indicate that quotes for professional services for advice on the NP were only received from 2 sources. Given the scale of expenditure of public money, a formal procurement process should be expected. PC documents do not show any such process and are absent of any reasonable level of analysis.

16. The provision of a care home in the NP is not evidence based.

17. The NP Concept Plan is misleading since the new development is presented in a camouflaged manner and omits important aspects of the proposal such as the new community building and 5Ha of formal recreation ground.

18. Policy BCD 7vi is not evidence based.

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

20. Decisions on site selection are based on personal choice rather than evidence. Cllr. Ford has stated at a PC Meeting that his vote for the Barrow Hill site was based on personal choice. Such decisions should be based on evidence.

21. The basis of the Strategic Environmental Assessment is 170 houses. Its comparison of sites is irrational because the NP's proposal is based on 170 houses, a care home, employment area and potentially a large sports & recreation area. Notably, the NP's preferred site is 13.6Ha which could potentially accommodate 408 houses (at 30 dpH).

22. Consultation material contains false and misleading information regarding independent environmental assessment. The NP Regulation 14 consultation material states that the site '*...has been carefully selected on the basis of an independent, comparative site analysis*'. This gives a misleading impression that the NP site was independently found to be the most sustainable when compared to other sites. It does not. AECOM's environmental assessment clearly shows that the NP's preferred option scores less well than other options.

23. Procedural propriety was not observed because Councillor Wesley has not consistently declared an interest at PC Meetings and has taken part in aspects of PC business such as proposing or seconding important PC Minutes that relate to his interest (by virtue of his employment by a landowner of the NP's preferred site).

24. Procedural propriety was not observed because the PC Chair has made false and misleading statements in relation to the NP. The PC Chair stated that it would be "illegal" for the PC to consider land at the north of the village. Consideration of the land is not illegal. Minutes from the PC Meeting of 5 September 2022 records that the PC Chair '*...reminded residents that the Neighbourhood Plan will not stop development. If the Neighbourhood Plan is voted down the village will be totally exposed*'. This statement is false and misleading since it gives parishioners the impression that if they vote against the NP the parish might be subject to large scale over-development. The actual situation is that prior to September 2022, WSC had published modest site allocations in their emerging LP for preferred housing sites at Denham Lane & Bury Road. The PC Chair has also stated that he would be unaffected by development because his home's central location. This is a false and misleading statement because the PC Chair's home is located on Denham Lane and the Denham Lane site begins roughly 100m from his home. Traffic from the site would pass his home.

25. AECOM's Strategic Environment Assessment has not given due regard to material considerations in its Landscape Assessment. The SEA states '*From a landscape perspective Option C (NP's preferred site) is likely to preform most favourably given the potential to create a neat edge to the south of the village*'. The SEA fails to consider that, due to the topology of the land, much of the NP's preferred site is on the slope of a hill and is highly visible from some distance. This is most noticeable from the southerly approaches to the village. Further, the term 'neat edge' is so nebulous and meaningless as to be nonsensical.

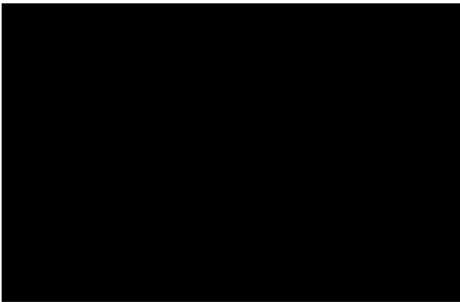
26. The NP does not present information in a fair and reasonable manner. The NP is a 106 page document and contains no summary. It does, however, contain numerous, irrelevant and potentially misleading stock images of non-Barrow locations and people.

27. The NP's site selection and development process has opened up the PC to legal challenge.

28. The PC 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 NP. 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, being three times more popular than the second most popular. PC Meeting Minutes indicate that this matter has not been given sufficient consideration and there has been no significant support by the PC for the NP to argue for the preferred area of the Parish. Following a complaint about lack of due consideration by the relevant landowner a review was carried out by planning experts Turley - but the results were somewhat predictable given Turley's other commercial pressures.

29. The PC 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 PC 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 RV4 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 NP. Accordingly, at least part of the site submitted in the NP 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.

With best wishes,





Neighbourhood Plan Barrow. Impact on General Practice Response

1 message

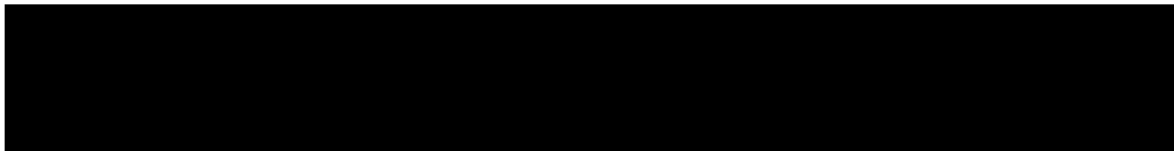
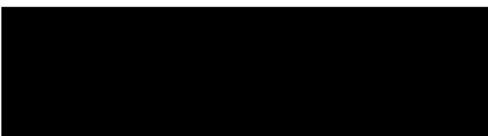


23 October 2023 at 09:03

Good Morning,

Following your email in regards to the neighbourhood plan for Barrow, please find attached a response letter prepared by [Redacted] whom is one of our GP Partners.

Many thanks,



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Neighbourhood Plan Response.docx
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Dear Parish Councillors,

I am taking the opportunity to respond to the consultation for the Barrow cum Denham Draft Neighbourhood Plan on behalf of the Guildhall and Barrow Surgery, as one of the GP Partners primarily based at Barrow Surgery. I would like to particularly thank Tony France for bringing the response deadline to our attention.

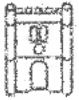
The Guildhall and Barrow Surgery currently has a list size of approximately 13,150 patients. We operate across our two sites in Bury St Edmunds and Barrow, and approximately 3,200 patients have Barrow listed as their preferred site and are allocated a GP based in the village. Although Wickhambrook Surgery and three of the other four Bury St Edmunds practices accept patients from Barrow cum Denham, we currently have over 1,800 patients registered from the parish which based on 2021 census data is 85% of the population of 2123', largely due to the convenience of having local access. This is particularly true for those who are unable to easily travel due to mobility or financial constraints.

The allocation of 170 houses similar to the number of houses which have already been added subsequent to Rural Vision 2031. The resulting population growth was a key factor leading to us extending Barrow Surgery and basing more staff there. The need for new housing is readily apparent and Barrow has the facilities, including the GP Surgery, to enable this to be done sustainably. Based on the current household size in the parish, we would anticipate almost 400 new residents which based on the proportions in the rest of the village would increase our list size by some 330 people. A proportion of GP funding is based on list size and so this should help us meet this demand, but does not provide for any necessary capital outlay and is dependent on being able to recruit to meet demand, an ongoing problem within primary care which we are already experiencing.

We understand that the Neighbourhood Plan is intended to provide a preferred location for housing growth compared to the Bloor Homes plan for the same number of houses off Bury Road, but if both developments were to happen this would of course double the additional impact. Across our practice area there are a number of other large scale developments planned or in progress which will result in further increases in demand for us.

We have no particular comments on the location of the housing allocation per BCD2, but note that its proximity to the surgery and the proposed prioritisation of footpath/cycleway links means that those who are able-bodied would readily be able to use active travel modes to attend the surgery.

Our particular concern relates to BCD2.4 "provision of a suitably located new Care Home or other identified forms of assisted living accommodation and/or general provision for later living needs". The need for provision for additional assisted living or additional care needs within the local area is not in dispute, particularly with the local age profile being significantly older than the national average as noted in the Draft Neighbourhood Plan. Older and multi-morbid patients have a higher demand on primary care than younger or fitter residents, and those in assisted living and particularly care or nursing homes will by definition have the greatest healthcare needs.

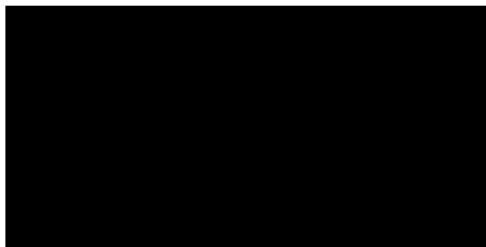


The present situation in the local area is that care homes are allocated to particular GP surgeries. Residents may choose to retain a previous GP but it is encouraged to register with the allocated GP as there is an NHS England requirement for a weekly "ward round" for routine care, usually undertaken in person and with the aim of pre-emptive care reducing hospital admissions and other

Although this figure is somewhat less than the 2019 estimated figure of 2501 contained in the Draft Neighbourhood Plan urgent care. We presently look after 59 residents in one care home (a mixture of nursing and care) which requires one session (0.11 GP FTE) for a ward round, and another 40 residents across our two other assigned care homes which require a further session of GP time. In addition, urgent or emergency care is provided for these residents throughout the rest of the week, the need for which will vary. We would typically allow a list size of 260 patients per GP clinical session so care home residents can be seen require a number (4-7) of times the GP time of our average patient. There is unfortunately no research in the last 20 years to formally evidence this. Sheltered accommodation would result in slightly less increased workload, but this would likely fall almost exclusively on our practice due to proximity, whereas the workload from a care home may result in a redistribution of the local care homes between surgeries.

In short, though, a care home of 60-80 beds as mentioned in the briefing notes is likely to have as much, if not more, impact on healthcare provision in Barrow as the other 170 houses combined. While there has been a proposal to make a one-off payment to General Practice per home, there has been no consideration of the additional impact of a care home or assisted living, and particularly the fact that this will generate an ongoing additional workload which by its nature, with residents being likely to be visited, will not benefit from any capital improvements to the surgery.

We thank you for this opportunity to comment on the Neighbourhood Plan and look forward to continuing to support the healthcare of the residents of Barrow cum Denham.
Yours faithfully,





Barrow Surgery response to draft Neighbourhood Plan

1 message

23 October 2023 at 12:15



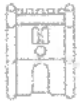
Hi 

I attach the local GPs' response to the draft plan. Please circulate it to the councillors and other interested parties.

Best wishes



 **GP Oct 2023 Neighbourhood Plan Response.docx**
53K



THE GUILDHALL & BARROW SURGERY

Dear Parish Councillors,

I am taking the opportunity to respond to the consultation for the Barrow cum Denham Draft Neighbourhood Plan on behalf of the Guildhall and Barrow Surgery, as one of the GP Partners primarily based at Barrow Surgery. I would like to particularly thank Tony France for bringing the response deadline to our attention.

The Guildhall and Barrow Surgery currently has a list size of approximately 13,150 patients. We operate across our two sites in Bury St Edmunds and Barrow, and approximately 3,200 patients have Barrow listed as their preferred site and are allocated a GP based in the village. Although Wickhambrook Surgery and three of the other four Bury St Edmunds practices accept patients from Barrow cum Denham, we currently have over 1,800 patients registered from the parish which based on 2021 census data is 85% of the population of 2123¹, largely due to the convenience of having local access. This is particularly true for those who are unable to easily travel due to mobility or financial constraints.

The allocation of 170 houses similar to the number of houses which have already been added subsequent to Rural Vision 2031. The resulting population growth was a key factor leading to us extending Barrow Surgery and basing more staff there. The need for new housing is readily apparent and Barrow has the facilities, including the GP Surgery, to enable this to be done sustainably. Based on the current household size in the parish, we would anticipate almost 400 new residents which based on the proportions in the rest of the village would increase our list size by some 330 people. A proportion of GP funding is based on list size and so this should help us meet this demand, but does not provide for any necessary capital outlay and is dependent on being able to recruit to meet demand, an ongoing problem within primary care which we are already experiencing.

We understand that the Neighbourhood Plan is intended to provide a preferred location for housing growth compared to the Bloor Homes plan for the same number of houses off Bury Road, but if both developments were to happen this would of course double the additional impact. Across our practice area there are a number of other large scale developments planned or in progress which will result in further increases in demand for us.

We have no particular comments on the location of the housing allocation per BCD2, but note that its proximity to the surgery and the proposed prioritisation of footpath/cycleway links means that those who are able-bodied would readily be able to use active travel modes to attend the surgery.

Our particular concern relates to BCD2.4 "provision of a suitably located new Care Home or other identified forms of assisted living accommodation and/or general provision for later living needs". The need for provision for additional assisted living or additional care needs within the local area is not in dispute, particularly with the local age profile being significantly older than the national average as noted in the Draft Neighbourhood Plan. Older and multi-morbid patients have a higher demand on primary care than younger or fitter residents, and those in assisted living and particularly care or nursing homes will by definition have the greatest healthcare needs.



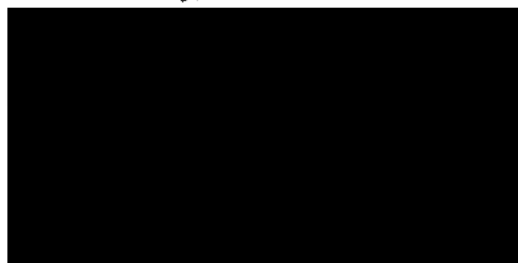
THE GUILDHALL & BARROW SURGERY

The present situation in the local area is that care homes are allocated to particular GP surgeries. Residents may choose to retain a previous GP but it is encouraged to register with the allocated GP as there is an NHS England requirement for a weekly "ward round" for routine care, usually undertaken in person and with the aim of pre-emptive care reducing hospital admissions and other

Although this figure is somewhat less than the 2019 estimated figure of 2501 contained in the Draft Neighbourhood Plan urgent care. We presently look after 59 residents in one care home (a mixture of nursing and care) which requires one session (0.11 GP FTE) for a ward round, and another 40 residents across our two other assigned care homes which require a further session of GP time. In addition, urgent or emergency care is provided for these residents throughout the rest of the week, the need for which will vary. We would typically allow a list size of 260 patients per GP clinical session so care home residents can be seen require a number (4-7) of times the GP time of our average patient. There is unfortunately no research in the last 20 years to formally evidence this. Sheltered accommodation would result in slightly less increased workload, but this would likely fall almost exclusively on our practice due to proximity, whereas the workload from a care home may result in a redistribution of the local care homes between surgeries.

In short, though, a care home of 60-80 beds as mentioned in the briefing notes is likely to have as much, if not more, impact on healthcare provision in Barrow as the other 170 houses combined. While there has been a proposal to make a one-off payment to General Practice per home, there has been no consideration of the additional impact of a care home or assisted living, and particularly the fact that this will generate an ongoing additional workload which by its nature, with residents being likely to be visited, will not benefit from any capital improvements to the surgery.

We thank you for this opportunity to comment on the Neighbourhood Plan and look forward to continuing to support the healthcare of the residents of Barrow cum Denham.
Yours faithfully,



**OBJECTION to Barrow Hill Development**

1 message

23 October 2023 at 11:42

To all members of the Barrow Parish Council,

I strongly object to the development that is being considered along Barrow Hill, on the South of the village.

These are my concerns:

1. Neighbourhood Plan policies have not been agreed and considered before site selection. This demonstrates both a lack of consideration to the neighbourhood as well as poor planning. A new development (housing with or without a Business Park) must be tailored to the village or town to ensure that it meets the specific requirements of that village / town. The policies therefore have to be agreed before the site is selected. This ensures that the policies, and therefore the neighbourhood, remain the priority. The policies have not been agreed in this case, indeed they have only recently been written, by a biased party.

2. The Plan is neither community led nor is it evidence based. The results of the parish questionnaire and the expert reports from AECOM contradicts the Plan. The Plan is being led by a small group of Councillors with minimal engagement of the parish. It is clearly evident therefore that the Parish Council have made minimal efforts to engage and consider their community, their parishioners. The minutes of the Parish Council were published late, there has been minimal communication with the parishioners in the form of pamphlets (less than 100 flyers distributed) and social medial postings (one post).

3. The parish's preferred location is the North of the Village. The Parish Council have not fought for this. They have also not made appropriate representations to West Suffolk Council regarding the settlement boundary or West Suffolk's policy DM29 regarding rural exception sites which might have enabled its development.

4. No clear or logical reason to contradict expert advice and the parish questionnaire is evident. There is a spurious reference to coalescence (see below) but otherwise, the Plan makes no reference or justification on why the Parish Council has made the decision of the preferred site, over evidently more suitable sites (as evidenced by the expert reports – see point below), that also are preferred by its parishioners.

5. The traffic has not been considered by the Parish Council. Traffic is one of the parishioners' main concerns, as demonstrated by the Parish Council's questionnaire. The Barrow Hill site is at the far end of the village from the A14 and is further away from the school. Development of the Barrow Hill site would significantly increase the traffic load through the middle of the village, particularly at rush hour. The roads are narrow, with stretches of thin pavement where children and parents walk to and from school. This will increase the risk of accidents occurring. In addition, at this time, the road works that occur on a regular basis in order to maintain the road surface, already cause significant disruption. Increased traffic flow will make this untenable.

6. Expert opinion clearly shows that the Barrow Hill site is not as sustainable as other sites. The expert reports by AECOM show that the site is not considered as

suitable as Denham Lane or Bury Road. Other than spurious reasons regarding coalescence (see below), there is no solid reason for ignoring expert advice and choosing a less sustainable site. Notably, the additional sporting facility promised by the landowners as part of their discussions with the PC is not included in the Plan and I believe there are no legal undertakings in place for them to be delivered. There is little confidence therefore that it will therefore be delivered. A hill side is unsuitable ground for football, rugby and cricket pitches. Major earthworks would be required for this to occur. The site proposed by the Plan is not supported over and above other sites by independent reports.

7. The Bury Road site was wrongly dismissed by the Parish Council. Bury Road site plans show a large open area at the north east of the site. The built portion of the site adjoins Bury Road for roughly 100m thus avoiding coalescence by roughly 150m. Parish Council Records show that the site was disregarded by the Parish Council because of coalescence. The historical impact assessment of the site contains errors which, once corrected, will further boost the site's sustainability ranking over Barrow Hill. Most importantly, the Bury Road site has good access to public transport with several bus stops nearby. Traffic would not nearly be as damaging as that from Barrow Hill since traffic to/from Bury would naturally use Bury Road.

8. Denham Lane site was wrongly dismissed by the Parish Council. The site is small and its elongated shape (with its long edge along the Barrow settlement boundary) means that it does not coalesce with Denham End. Notably, Denham End does not have a settlement boundary as it is classified as countryside by West Suffolk. The site was assessed as highly suitable by independent experts, AECOM.

9. The Barrow Hill site is excessively large. The site could accommodate 400+ houses which is more than double Barrow's housing requirement. In addition, the inclusion of a large employment area is unfounded given:

- a. a site for a light industrial/office area (Barrow Business Park) has already been allocated near the school
- b. planning permission is already granted for large offices at Barrow Hill (DC/18/0252/FUL)
- c. planning permission is already granted for substantial offices at Barrow Hall (DC/20/1396/FUL)
- d. demand for office space is much reduced due to home working
- e. the absence of any public transport to an employment area.

10. Development at Barrow Hill may be in addition to sites in West Suffolk's Local Plan but this was not included in the consultation material. West Suffolk Council have informed the Parish Council that the Neighbourhood Plan sites may be chosen in addition to those already chosen in West Suffolk's emerging Local Plan. Importantly, this key piece of information has been omitted from the consultation. This indicates a biased approach – particularly given the Plan's authors (see below).

11. Site selection process was unfair. The Parish Council provided important data about the Neighbourhood Plan to one landowner (the Parish Council Vice-Chair) and not others (see PC Minutes of Nov. 2021). Importantly, the Parish Council Vice-Chair did not declare her interest at various Parish Council Meetings. She also took part in meetings where she did declare an interest by taking the minutes. She did not withdraw from Parish Council Meetings when the agenda item relating to her interest was discussed and therefore did not comply with the Parish Council's Standing Orders on Code of Conduct & Dispensations Section 13 dated March 2021. There is no record of the Parish Council Vice-Chair being granted a dispensation not to withdraw from relevant PC Meetings.

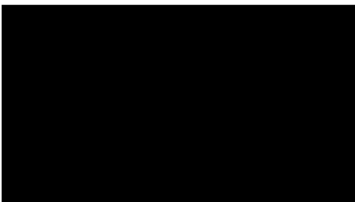
12. The Plan has been written by experts whose interests align with the landowners, not the Parish. The Parish Council chose Turley's Cambridge Office to

write the Plan. They have carried out 30+ projects for one of the landowners who is also a founding director of the developers, Pigeon. It is naïve to think that the consultants will not be biased towards the commercial interests of a major client over the Parish. This bias is demonstrated by the inference that the employment areas could be converted to housing (the loophole evident in Policy 7), inaccuracy (missing the Bury Road bus stops on the amenities map), the misleading description of the Parish Council's sporting facilities.

13. Due process has not been followed: This is evidenced by:

- a. the declarations of councillors' interests;
- b. providing Neighbourhood Plan information to one landowner but not others;
- c. not agreeing policies before site selection;
- d. the use of personal preference (statement from Cllr. Ford at PC AGM) rather than evidence in voting and
- e. the use of non-independent experts to write policies.

Your sincerely,





Response to Public Consultation - Barrow -cum-Denham Neighbourhood Plan

1 message

23 October 2023 at 13:09

To whom it may concern,

I object strongly to the Barrow-cum-Denham Parish Council [PC] Neighbourhood Plan [NP]. The reasons are:-

1. The PC Vice-Chair did not declare her interest, as a landowner at Barrow Hill, at various PC Meetings including 14-10-2021, 1-11-2021, 7-3-2022 & 4-4-2022. The PC Vice-Chair attended these meetings but did not declare an interest.
2. The NP site selection process gave preferential treatment to one landowner - the PC Vice-Chair - over other landowners. Minutes of the PC Meeting from 1-11-2021 state "*Cllr Steer has joined the NP Sub Committee. Cllr Kronbergs to forward all relevant documentation to her.*" The PC did not provide the same documentation to other landowners. This, and any other information she received relating to the NP that other landowners did not receive, gave the PC Vice-Chair an unfair advantage over other landowners.
3. The PC Vice-Chair took part in relevant aspects of PC Meetings (when she had declared an interest) such as the 2023 PC AGM, by taking minutes or proposing or seconding Minutes which related to her interests.
4. The PC Vice-Chair did not declare a relevant, commercial relationship with another landowner. In December 2020, Land off Barrow Hill was submitted as part of West Suffolk Council's [WSC] Call for Sites in the emerging Local Plan (LP). Notably, the submission is a Turley document and is available from WSC's web-site. The relationship is evident from page 2 of the submission:- "*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.*" The similarity and relevance to the NP is clear.
5. The NP has not selected the most sustainable site (according to supporting documentation) and the reasons for this are unclear, absent or irrational.
6. NP Policies were not developed & approved by the PC prior to site selection. This is an important procedural error. PC Meeting Minutes show no record of policies being approved before site selection. Rather, PC Minutes show that NP policies were drafted following site selection to suit the preferred site (see Turley Scope of Work in PC Minutes).
7. Rejection of the Denham Lane site is irrational. The PC rejected this site as it would 'close the gap between Barrow and Denham'. The Denham Lane site is a small site (0.66Ha), suitable for around 20 dwellings and its shape means that erosion of any green space between Denham and Barrow is minimal. Notably, the site has been selected by WSC.
8. At 13.6Ha (+ potentially 5Ha for sports & recreation grounds), the preferred site is unnecessarily large to accommodate the housing requirement of 170 houses for Barrow. 13.6Ha could house 400+ houses at 30 dwelling per Ha. The PC has failed to give due consideration to the protection of green space and the environment, contrary to parishioners' views shown in the PC's own Report on Parish Questionnaire.
9. By selecting a site south of the village, the PC has failed to give due consideration to traffic which would have to travel through all the village to the main access routes.
10. The provision of additional sports & recreation facilities to support the NP's selection of less sustainable site is irrational and contradicts supporting evidence. Question 15 of the Parish Questionnaire showed that 74.9% of respondents, agreed or agreed strongly that Barrow-cum-Denham had sufficient sports & leisure facilities. Question 25 of the Questionnaire showed that 77.7% of respondents agreed or agreed strongly that Barrow-cum-Denham had sufficient play areas for children.
11. Important information about WSC's emerging LP has been omitted from the Consultation. PC Minutes show that WSC has notified the PC that if the NP selected sites in addition to those already selected by WSC's emerging Local Plan, that these might be considered in addition to, rather than

instead of the NP's preferred sites. This important information has been omitted from the Consultation.

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 The Weeping Willow Public House or Barrow House.

13. The NP site selection has failed consider the Bury Road Site properly. The NP 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 NP and supporting Regulation 14 information has been drafted by a non-independent source and their selection by the PC indicates bias. It is remarkable that of the dozens of UK planning consultants able to carry out the NP work, that the same consultants as used by Barrow Hill landowners/Pigeon and PC Vice-Chair have been chosen by the PC. 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 interest of the Barrow parishioners.

15. Procedural propriety has not been observed in the use of public money to pay NP advisors. PC Meeting Minutes including those from 5 December 2022 indicate that quotes for professional services for advice on the NP were only received from 2 sources. Given the scale of expenditure of public money, a formal procurement process should be expected. PC documents do not show any such process and are absent of any reasonable level of analysis.

16. The provision of a care home in the NP is not evidence based.

17. The NP Concept Plan is misleading since the new development is presented in a camouflaged manner and omits important aspects of the proposal such as the new community building and 5Ha of formal recreation ground.

18. Policy BCD 7vi is not evidence based.

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

20. Decisions on site selection are based on personal choice rather than evidence. Cllr. Ford has stated at a PC Meeting that his vote for the Barrow Hill site was based on personal choice. Such decisions should be based on evidence.

21. The basis of the Strategic Environmental Assessment is 170 houses. Its comparison of sites is irrational because the NP's proposal is based on 170 houses, a care home, employment area and potentially a large sports & recreation area. Notably, the NP's preferred site is 13.6Ha which could potentially accommodate 408 houses (at 30 dpH).

22. Consultation material contains false and misleading information regarding independent environmental assessment. The NP Regulation 14 consultation material states that the site '*...has been carefully selected on the basis of an independent, comparative site analysis*'. This gives a misleading impression that the NP site was independently found to be the most sustainable when compared to other sites. It does not. AECOM's environmental assessment clearly shows that the NP's preferred option scores less well than other options.

23. Procedural propriety was not observed because Councillor Wesley has not consistently declared an interest at PC Meetings and has taken part in aspects of PC business such as proposing or seconding important PC Minutes that relate to his interest (by virtue of his employment by a landowner of the NP's preferred site).

24. Procedural propriety was not observed because the PC Chair has made false and misleading statements in relation to the NP. The PC Chair stated that it would be "illegal" for the PC to consider land at the north of the village. Consideration of the land is not illegal. Minutes from the PC Meeting of 5 September 2022 records that the PC Chair '*...reminded residents that the Neighbourhood Plan will not stop development. If the Neighbourhood Plan is voted down the village will be totally exposed*'. This statement is false and misleading since it gives parishioners the impression that if they vote against the NP the parish might be subject to large scale over-development. The actual situation is that prior to September 2022, WSC had published modest site allocations in their emerging LP for preferred housing sites at Denham Lane & Bury Road. The PC Chair has also stated that he would be unaffected by development because his home's central location. This is a false and misleading statement because the PC Chair's home is located on Denham Lane and the Denham Lane site begins roughly 100m from his home. Traffic from the site would pass his home.

25. AECOM's Strategic Environment Assessment has not given due regard to material considerations in its Landscape Assessment. The SEA states '*From a landscape perspective Option C (NP's preferred site) is likely to preform most favourably given the potential to create a neat edge to the south of the village*'. The SEA fails to consider that, due to the topology of the land, much of the NP's preferred site is on the slope of a hill and is highly visible from some distance. This is most noticeable from the southerly approaches to the village. Further, the term 'neat edge' is so nebulous and meaningless as to be nonsensical.

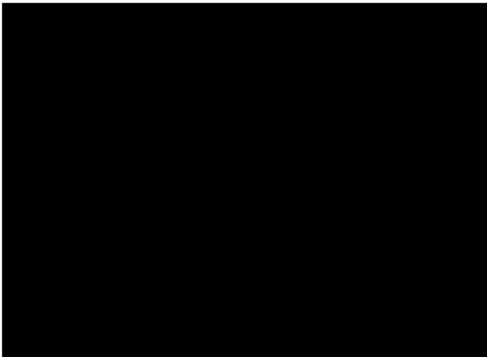
26. The NP does not present information in a fair and reasonable manner. The NP is a 106 page document and contains no summary. It does, however, contain numerous, irrelevant and potentially misleading stock images of non-Barrow locations and people.

27. The NP's site selection and development process has opened up the PC to legal challenge.

28. The PC 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 NP. 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, being three times more popular than the second most popular. PC Meeting Minutes indicate that this matter has not been given sufficient consideration and there has been no significant support by the PC for the NP to argue for the preferred area of the Parish. Following a complaint about lack of due consideration by the relevant landowner a review was carried out by planning experts Turley – but the results were somewhat predictable given Turley's other commercial pressures.

29. The PC 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 PC 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 RV4 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 NP. Accordingly, at least part of the site submitted in the NP 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.

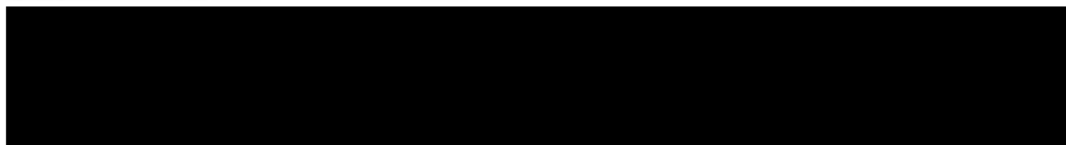
Regards,





Response to Reg 14 Barrow Neighbourhood Plan on behalf of Fleur-Hill

1 message



23 October 2023 at 17:26

Dear Sirs,

On behalf of our client, [redacted] please find attached our response to the Regulation 14 Local Plan. Also attached is our Vision Document for Land between [redacted] Barrow, and two notes on education provision at the primary school.

I would be grateful if you could acknowledge receipt of this email and its attachments and if you need any further information, please do let us know.

We would also welcome the opportunity to discuss the site and the benefits it can deliver with you if this would be of interest.

Kind regards







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4 attachments

-  **Barrow Reg 14 NP reps Oct23.pdf**
664K
-  **EFM report Barrow Primary School 27.09.23.pdf**
765K
-  **EFM Report - Barrow Primary School 19.07.22.pdf**
273K
-  **Barrow Vision Proposal_Neighbourhood Plan.pdf**
1649K



**BARROW CUM DENHAM DRAFT NEIGHBOURHOOD PLAN 2020-2033
REGULATION 14 CONSULTATION**



October 2023

Site Name:	Land between Colethorpe Lane and Church Road, Barrow
Client Name:	[REDACTED]
Type of Report:	Regulation 14 Consultation representations
Prepared by:	[REDACTED]
Checked by:	[REDACTED]
Date:	October 2023

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1. INTRODUCTION

- 1.1 This representation has been prepared on behalf of our client, [REDACTED] in response to the Barrow cum Denham Neighbourhood Plan Regulation 14 Consultation Draft. The draft document has been prepared by Turley on behalf of the Barrow cum Denham Neighbourhood Plan Steering Group and we understand there has been no input from the District Council.
- 1.2 Our client is promoting land between Colethorpe Lane and Church Road, Barrow, for residential development and includes land for the expansion of the village primary school with an option for the land to be employment-led development should the land not be required by the school.
- 1.3 In addition to this representation, the following reports are included:
- Vision Document including a draft Illustrative Masterplan; and
 - Notes on education by EFM (19th July 2022 and 27th September 2023)
- 1.4 The site has not been identified as a potential allocation within the draft Neighbourhood Plan, however, we consider it represents a more suitable alternative to land east of Barrow Hill which has been allocated in the draft Neighbourhood Plan for up to 170 dwellings. The Consultation Questionnaire (August 2020) for the draft Neighbourhood Plan identified the location of the site (in the north-western sector of the Parish) as the preferred location for any required new homes, suggesting this is where the local community would most like to see new development located.
- 2.1 Support for the development was also echoed at a public exhibition Fleur-Hill held in March 2023. The response from local residents, both verbally at the consultation and via written responses, was overwhelmingly positive and in favour of the proposed development.
- 90% of respondents considered the Colethorpe Lane Development as being within their preferred 'development zone' within the village;
 - 92% of respondents outlined their preference as the Colethorpe Lane site over the Barrow Hill and Bury Road site;
 - 81% of respondents considered that the extra land being offered to the school was important for the village.
- 1.5 A key benefit of the site is its proximity and easy access onto the A14. The majority of traffic movements to and from the village are to and from the A14, and the location of the site to the north-west of the village means that traffic will not have to travel through the village.
- 1.6 The draft proposals are illustrative and currently show a scheme for approximately 95 new homes (including 35% affordable housing), one hectare of land within the site boundary for employment, or to aid the expansion of the existing primary school, and public open space. However, these proposals are indicative only and we would welcome further views of the local community as to what they would like to see delivered as we progress the site.

- 1.7 The delivery of this site for housing can provide a significant community benefit through the provision of land for the primary school. Evidence suggests that the existing school site is woefully small and is already of a sub-standard size to accommodate a 1FE primary school. Furthermore, the addition of 170 new homes to the village on Land to the East of Barrow Hill (or elsewhere) would mean that unless the school expands, pupils that would have expected a place from further afield or within the edges of the catchment would no longer be able to secure a place. Discussions with the school and Suffolk County Council have confirmed that additional land would be welcomed to enable them to expand and improve the current educational offer.
- 1.8 It is considered that the offer of this land, along with the support expressed by the local community at our public exhibition and in the Consultation Questionnaire, suggests that this is by far the optimal site for growth in the village.
- 1.9 The site is being promoted by [REDACTED] which is a partnership between Fleur Homes and the Hill Group.
- 1.10 Fleur Homes was founded in 2007 by Joff Brooker and Juliette Hopkins. Fleur Homes is a design-led business that specialises in creating beautiful, new homes in some of Norfolk and Suffolk's most attractive locations. Fleur Homes combines prime locations with bespoke house and landscape design to create exceptional properties that complement and enrich their environment. In recognition of this, Fleur Homes won the Gold WhatHouse? Award, Best Small Housebuilder 2018.
- 1.11 The high quality of Fleur's developments and their success in reflecting the local vernacular has been praised by local councils. The development at Risby nearby Fisher's Field has been made an example for other developers to follow by St Edmundsbury Borough Council.
- 1.12 Celebrating 24 consecutive years of growth, Hill Group is a Top 20 UK Housebuilder and the second largest in private ownership. They are an award-winning 5-star housebuilder operating across London and southern England in an area stretching from Cambridge to Oxford and across to Bristol and down to the south and east coasts. Hill carry out a diverse range of developments, from joint venture projects and private sale developments to affordable new homes for housing associations and local authority clients. Their vision is to be the leading, most trusted provider of distinctive, quality homes in the UK and their commitment to quality and customer satisfaction has been widely acknowledged.
- 1.13 Hill has won over 480 industry awards in the past 24 years, including Best Medium Housebuilder at the Housebuilder Awards for the last three years. In addition, they have been awarded the 5-star status in the Home Builders Federation's annual Customer Satisfaction Survey for the past six years. As part of their landmark 20th anniversary celebrations in 2019, Hill launched Foundation 200, a £15m pledge to donate 200 fully equipped modular homes to local authorities and homeless charities in the communities in which they operate.

2. SITE BACKGROUND

Site and Surroundings

- 2.2 The site is located to the north-west of Barrow between Colethorpe Lane and Church Road. It extends to approximately 5.6 hectares and it is currently in agricultural use.
- 2.3 The site sits adjacent to Barrow CEVC Primary School, a 1FE primary school that is currently at capacity. This is discussed in further detail in Section 3. East of the site is Church Road, beyond which is residential development and a large paddock associated with a residential property. West of the site is Colethorpe Road which is interspersed with residential properties. North of the site is a public right of way (PROW) beyond which is agricultural land. The site is connected by footways to the centre of the village. We would look to enhance the key pedestrian routes surrounding the site, this would include both improvements to existing pedestrian infrastructure as well as creating new footways.
- 2.4 It is envisaged vehicular access will be taken from Colethorpe Road. Work has been undertaken to show that a safe and appropriate junction design can be provided. This road links the village with Junction 14 of the A14 providing strategic connections with Bury St Edmunds and Cambridge.
- 2.5 Further details of the site and its context are contained in the accompanying Vision Document.

Planning and Promotion History

- 2.6 The southern area of the site is allocated in the adopted Rural Vision 2031 (2014) for B1 employment (Site RV4 (a) Barrow Business Park). We have chosen not to bring this use forward yet as we believe (along with the majority of villagers) that the site should provide for residential development as set out in the Parish Council's Consultation Questionnaire and feedback from our public exhibition. Discussions with the school and Suffolk County Council have also confirmed that additional land would be welcomed to enable them to expand and improve the current educational offer. Notwithstanding this, we have not yet ruled out the possibility that the allocated land be developed for employment-led development.
- 2.7 This allocation does confirm that West Suffolk consider the principle of development in this location acceptable despite it not being within the defined settlement boundary.
- 2.8 As part of the preparation of the emerging Local Plan, the site (including the employment allocation) was promoted for residential development. It was initially submitted to the Council's Call for Sites consultations in November 2018 (and again in a further Call for Sites consultation in July 2022). The site was identified as a 'deferred site' (Site WS225) in the Strategic Housing and Economic Land Availability Assessment (SHELAA, February 2020).

- 2.9 The only reason provided for the site's deferral was that it is not adjacent to the settlement boundary. As a result, further representations were made in response to the SHELAA stakeholder consultation in July 2022 on the suitability, availability and achievability of both sites (residential and employment). Further representations were also submitted in September 2022, in objection to the methodology used in the SHELAA for scoping in and scoping out sites such as the arbitrary and historic line drawn around a settlement. Our representations on each of these consultation stages are available to view on the West Suffolk Council website.
- 2.10 Fleur-Hill have and will continue to promote the site through the emerging Local Plan and will be submitting further responses as the plan progresses.
- 2.11 On 29th March 2023 between 2:30pm and 9:00pm, Fleur-Hill held a public exhibition in the village hall to discuss the potential development of the site with local residents in more detail.
- 2.12 There were a number of Fleur-Hill employees in attendance at the exhibition to answer any queries from local residents. The count showed that 122 people attended throughout the course of the day. Local resident's responses to the public exhibition were recorded via an optional questionnaire, which was made available for all local residents who wished to express their views.
- 2.13 The response from local residents, both verbally at the consultation and via written responses were overwhelmingly positive and in favour of the proposed development at Colethorpe Lane.
- 90% of respondents considered the Colethorpe Lane Development as being within their preferred 'development zone' within the village;
 - 92% of respondents outlined their preference as the Colethorpe Lane site over the Barrow Hill and Bury Road site;
 - 81% of respondents considered that the extra land being offered to the school was important for the village.
- 2.14 Residents have been largely in favour of land being allocated for the school on site, as well as the site's location in relation to the centre of Barrow and the ease by which traffic will flow directly out to the A14, rather than through the village, as would be the case with the other proposed sites.
- 2.15 Responses also showed that residents were generally in favour of the proposed design and layout and were encouraged by the possibility of pedestrianised links to the school and the village.

Policy Context

- 2.16 In accordance with the Basic Conditions Neighbourhood Plans must comply with, they must be in 'general conformity with the strategic policies contained in the development plan' and have 'regard to national policies and advice contained in guidance issued by the Secretary of State' which includes the NPPF.
- 2.17 The Development Plan for West Suffolk of relevance to this site comprises the Core Strategy (2010), St Edmundsbury Rural Vision 2031 (2014) and the Joint Development Management Policies Document (2015). This is the Development Plan the Neighbourhood Plan should be in general conformity with, albeit key policies are now out of date.
- 2.18 The PPG provides guidance for Neighbourhood Plans which come forward before an up-to-date Local Plan is in place. The draft Neighbourhood Plan is not tested against the policies in an emerging plan, however, it notes the reasoning and evidence informing the local process is likely to be relevant. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. In this regard, we welcome the recognition in the Neighbourhood Plan that new sites need to be identified to meet local housing needs.
- 2.19 However, the West Suffolk Local Plan is still in its early stages and until it has been examined and the Inspector has provided comment, little weight can be attributed to the policies within, and its evidence base.
- 2.20 There is no legal requirement for the Neighbourhood Plan to comply with the emerging Local Plan, nor is there any requirement (legal or otherwise) for the Neighbourhood Plan to allocate Sites BE6 and BE8 because this has been identified as a potential allocation in the emerging West Suffolk Local Plan.
- 2.21 If the evidence collated in support of the Neighbourhood Plan suggests an alternative site should be allocated, then it is more than appropriate for the Plan to allocate what it considers to be the better site.
- 2.22 As discussed in Section 3 below, we are of the view that Land between Colethorpe Lane and Church Road makes for a more suitable allocation than Land east of Barrow Hill. The Neighbourhood Plan evidence base does not assess all sites equally, and the results of the resident's survey suggest more people would prefer to see land to the north-west of the village come forward for development than land to the south-east.

3. THE PROPOSALS

- 3.1 To inform the proposals on the site, Fleur-Hill have instructed professional consultants to advise on matters including highways, landscape, heritage, drainage and design. This technical information has then informed the illustrative proposals which are for approximately 95 new homes (including 35% affordable housing), one hectare of land for employment or for the expansion of the existing primary school, and public open space.

Land for Education

- 3.2 Two reports from EFM (who specialise in advice and guidance on educational establishments) have been submitted in support of this response (July 2022 and September 2023). The reports provide analysis of the current and future capacity of the school and its land area requirements.
- 3.3 The first report (19th July 2022) discusses the appropriate land take for primary and early years provision. The Department of Education (DfE) identify Barrow Primary School as a 1FE School. For a 210 place 1FE Primary School without a nursery, the DfE suggests a site area of 1.122 hectares. The DfE suggests a nursery should have 358m² plus access, drop off and staff parking (c.500m²). The recommended site area for a primary school and nursery is therefore approximately 1.6 hectares.
- 3.4 The existing school site (which includes a nursery) extends to approximately 0.86ha, well below DfE guidance.
- 3.5 The second report (27th September 2023) has been commissioned to consider the impact of additional development on the village. It advises a 1FE primary school should provide 210 pupil spaces (for reception through to year 6). As of January 2023, the school has 201 pupils with most year groups full. Recently published DfE assessment of pupil yield from new housing for West Suffolk suggest a yield of 28 pupils for 100 new homes. 170 new homes would indicate 48 new pupils, nearly 7 per year group.
- 3.6 The addition of 170 new homes to the village on Land to the East of Barrow Hill (or elsewhere) would mean that unless the school expands, pupils that would have expected a place from further afield or within the edges of the catchment would no longer be able to secure a place.
- 3.7 Therefore, in order for the school to continue to provide the quality of education (Ofsted rating 'Outstanding') in its current location to meet the current and future needs of Barrow, it is essential that realistic growth options are found.
- 3.8 In paragraph 15.10 of the Draft Infrastructure Delivery Plan (2022) prepared in support of the West Suffolk Plan, it states that one of the key pressures for finding suitable land for schools to grow is the cost and logistical difficulty to assemble sufficient land in settlements. Paragraph 15.11 also states that with growth, some primary schools are expected to exceed

capacity and developer contributions are not necessarily enough to achieve expansion capacity.

- 3.9 The allocation of land between Colethorpe Road and Church Road would overcome this major hurdle in land assembly to allow the primary school to grow for the benefit of local residents. The impact on primary school places from the housing development of the site would also be offset by providing the primary school with land to expand which would maintain its long term future for the benefit of the village and local residents. The housing development on the site could also provide a contribution towards expanding the school and/or facilitating highway improvements to access the school via walking and cycling. These are potentially very significant benefits for allocating the site.
- 3.10 The additional housing on the site would also reduce the need for future pupils and parents to travel by car to the school as the school would be within walking distance. The school is one of the main destination points in the village. The other proposed allocations in the village would require pupils to travel a considerable distance to access the school and cross roads. The proximity of the site to the primary school demonstrates that the site is in a sustainable location.
- 3.11 The land for a new school is something only this site can offer. Whilst other proposals in Parish will likely be required to provide a financial contribution to primary education as part of any S106 Agreement, this will not overcome the issue of capacity at Barrow School and the fact that it is too small to accommodate even its existing needs. Furthermore, if there is no capacity in the school, there is the possibility that any financial contributions made could go towards other schools in the District rather than Barrow Primary school itself.

Land for employment

- 3.12 The southern part of the site is allocated in the Rural Vision (2014) for B1 employment. As noted above, we have chosen not to bring this use forward yet as we believe that the site should provide for residential development. Notwithstanding this, we have not yet ruled out the possibility that the allocated land be developed for employment-led development.
- 3.13 The current masterplan indicates the land can be provided for the primary school or for employment uses. However, as noted above, this layout is indicative and we are open to exploring the opportunity of providing employment land alongside land for a school or housing should there be an identified need.

Transport and Access

- 3.14 A key benefit of the site is its proximity and easy access onto the A14. The majority of traffic movements to and from the village are to and from the A14, and the location of the site to the north-west of the village means that traffic will not have to travel through the village. This was also supported by the results of the Neighbourhood Plan Consultation Questionnaire.

- 3.15 Local residents have previously commented that traffic speed along Church Lane is an issue. Should this site be allocated, Fleur-Hill would be willing to investigate whether further speed restrictions or traffic calming could be applied on Colethorpe Lane and Church Road.
- 3.16 Fleur-Hill instructed WSP to determine the most appropriate location for access into the site, which they resolved would be from Colethorpe Road. However, a secondary pedestrian/cycle access can also be explored to allow for greater site permeability which would encourage sustainable modes of travel such as walking and cycling.

Landscape

- 3.17 The site is enclosed by built infrastructure to the south, east and west. As noted in the Vision Document, which was informed by a Landscape and Visual Impact Assessment undertaken in 2019, views from the site are predominantly contained by existing boundary vegetation.
- 3.18 A landscape-led development of the site enables significant opportunities to establish a development that provides a strong green urban edge to Barrow and to create a sensitive transition to the surrounding countryside of the Plateau Estate Farmlands. This includes, inter alia, the strengthening of the existing pattern of vegetation and creating a varied landscape structure with interlinked green infrastructure and open space to provide multipurpose benefits.

Heritage

- 3.19 There are a number of listed buildings within the vicinity of the site. However, the site is well-screened and it is not considered the proposals will have a significant impact upon the setting of these or the scheduled ancient monument to the north of the village. The masterplan layout shows that the site boundaries will be enhanced to further screen any new housing to mitigate the visual relationship with the heritage assets nearby. The design and layout of the site would also seek to sympathetically respond to the site context.

Open space

- 3.20 The Illustrative Masterplan contained in the Vision Document shows publicly accessible open space in the north-east of the site. Fleur-Hill would welcome the thoughts of the local community in terms of what type of open space or play provision they would like to see delivered on the site.

4. RESPONSE TO THE DRAFT NEIGHBOURHOOD PLAN

Evidence Base – Site Options Assessment Draft Report (September 2021)

4.1 This site was assessed in the Site Options Assessment Draft Report as a potential residential allocation plus one hectare for school extension (Site Reference BD5). It was concluded that the site is not suitable for allocation. The reasons can be summarised as follows and are discussed in further detail below:

1. Its development would be contrary to the General Employment Area designation set in Policy RV4 Rural Employment Areas in the Rural Vision 2031 planning framework.
2. Development of the site for housing would be contrary to Policy RV3: Housing Settlement Boundaries, Policy DM5: Development in the Countryside and Policy DM27: Housing in the Countryside.
3. Development of the site would elongate the village to the north and not be sympathetic to the 'form and character of the settlement' as required in clause b. of Policy DM29.
4. The West Suffolk Issues and Options Site Submission Review 2021 conclusions are justified in that the site is removed and not adjacent to the settlement boundary.
5. The site is not appropriate for allocation in the Neighbourhood Plan, but the northern part of the site may be acceptable as an exception site for affordable homes, subject to discussion with West Suffolk Council.

Its development would be contrary to the General Employment Area designation set in Policy RV4 Rural Employment Areas in the Rural Vision 2031 planning framework.

4.2 As noted throughout this report, Fleur-Hill have not ruled out bringing this site forward for employment. However, it is considered this site is more appropriate for residential development. This is a view which was supported by the majority of villagers who attended the public exhibition held on 29th March 2023 and in the Neighbourhood Plan Consultation Questionnaire.

4.3 Discussions with the school and County Council have also confirmed that additional land would be welcomed to enable them to expand and improve the current educational offer.

4.4 Through this Neighbourhood Plan process, the opportunity is presented to bring the site forward for something villagers would like to see and indeed the local community desperately needs in respect of land for a school.

Development of the site for housing would be contrary to Policy RV3: Housing Settlement Boundaries, Policy DM5: Development in the Countryside and Policy DM27: Housing in the Countryside.

4.5 The Development Plan for the former St Edmundsbury area is chronically out-of-date. The current Plan pre-dates the National Planning Policy Framework and, following the creation

of West Suffolk Council in 2019, the new Council needs to start afresh and plan positively for the new, larger area as noted by West Suffolk in its Issues and Options Plan (2020).

- 4.6 We welcome the Neighbourhood Plan's positive approach to the delivery of housing, and the recognition that new sites need to be delivered outside of the settlement boundary as defined in the adopted Local Plan.
- 4.7 In assessing potential sites for development, it is therefore inevitable that those outside of the settlement boundary will be contrary to Policies RV3, DM25 and DM27. Site BD5 is outside the existing settlement boundary and is concluded to be contrary to these policies.
- 4.8 However, despite preferred Sites BD6 (Land East of Barrow Hill) and BD8 (Land south of Barrow Forge) also being contrary to Policies RV3, DM25 and DM27, no such conclusions are drawn in their respective site assessments.
- 4.9 We do not consider a fair and proper process has been followed in preparing the Site Options Assessment Draft Report. The PPG notes proportionate and robust evidence should support the choices made and the approach taken in the Neighbourhood Plan. The Report appears to have assessed Sites BD6 and BD8 on proviso that they will be allocated, rather than assessing these sites against the same criteria as all other sites submitted, and then concluding they are the most appropriate for development.

Development of the site would elongate the village to the north and not be sympathetic to the 'form and character of the settlement' as required in clause b. of Policy DM29

- 4.10 Whilst the site would expand the village to the north, we strongly disagree that this would not be sympathetic to the form and character of the village. The site is contained by infrastructure to the south, east and west and an appropriate landscape buffer can be provided to the north to ensure the site does not give the feeling of encroaching into the countryside. It is noted in the Site Report that the site is contained from view by hedgerow and trees.
- 4.11 The illustrative masterplan has sought to work within the existing landscape parameters and the design enables significant opportunities to establish a development that provides a strong green urban edge to Barrow and to create a sensitive transition to the surrounding countryside of the Plateau Estate Farmlands.
- 4.12 The assessment of Site BD6 (Land east of Barrow Hill) notes that this site is open to the north and east but that contains limited features of value and could be considered of medium sensitivity in terms of visual amenity due to indivisibility with the surrounding landscape. No landscape evidence appears to have been submitted to support this assertion. Development of this site will elongate the village to the south and east, particularly as there are no existing defensible boundaries to the north, south and east.
- 4.13 As per our comments above, there does not appear to be any consistency with how sites have been assessed. Sites BD6 and BD8 do not have any defensible boundaries, yet this has been turned into a positive in their respective site assessments whereas a site with

existing defensible boundaries (i.e. BD5) is considered to have a negative impact despite evidence to the contrary.

The West Suffolk Issues and Options Site Submission Review 2021 conclusions are justified in that the site is removed and not adjacent to the settlement boundary.

- 4.14 In West Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) the site was assessed as two parcels (site references WS225 and WS229) even though they form one overall site in one ownership and it was submitted to the Call for Sites as a single site.
- 4.15 In the SHELAA, the sites were 'deferred' due to "significant policy constraints". The significant policy constraint being that the sites were "not adjacent to settlement boundary". On this basis, the site was not given any further consideration and other sites were taken forward instead. We strongly disagree with this assessment for the following reasons:
- Given that the southern part of the site is currently allocated in the adopted local plan for employment, rejecting the rest of the site on the basis that it is not adjacent to Barrow's settlement boundary is inappropriate. It also fails to recognise that the site was promoted as one parcel, not two. It may not immediately adjoin the current settlement boundary (which as noted above is out-of-date), but it is partially allocated for development and immediately abuts the existing built edge of the village.
 - Using proximity to the settlement boundary as a criterion for selection is fairly arbitrary and fails to take into account other considerations, such as the much needed expansion of a community facility.
 - The settlement boundary as defined in 2014 does not mark the edge of the settlement. The site is located adjacent to the primary school, an allocated employment site, and residential development along Colethorpe Lane and Church Road which are also situated outside the existing settlement boundary but clearly form part of the village. Indeed Policy BCD8 of the Neighbourhood Plan notes that the school is "...at the northern part of the main settlement".
- 4.16 Therefore, the methodology used to assess the site is unsuitable for selecting potential sites for growth. A more site specific process, which looks at more than just the proximity to the arbitrary settlement boundary line should be used, particularly in this instance.
- 4.17 The site is considered to be in a suitable location in terms of its proximity to the main settlement and local services which are all within walking distance of the site. Part of the site is also allocated as a Rural Employment Area (RV4) in the current Local Plan. Therefore development is accepted in principle in this location. The primary school is located to the south and is the only school in the village and so should be supported when possible/necessary.

4.18 The site is well related to Barrow, it is immediately related to its built form and is contained by built infrastructure to the south, east and west. The conclusions in the emerging West Suffolk Local Plan are not justified and should not be relied upon in the assessment of this for allocation in the Neighbourhood Plan.

The site is not appropriate for allocation in the Neighbourhood Plan, but the northern part of the site may be acceptable as an exception site for affordable homes, subject to discussion with West Suffolk Council.

4.19 As set out above, we disagree with the conclusions drawn in the Site Options Assessment Draft Report in its assessment of the site.

4.20 It is agreed that in the context of the adopted Development Plan, the site would be suitable as an exception site for affordable homes. However, as set out above, the adopted Development Plan is out-of-date and the Neighbourhood Plan needs to allocate additional homes to meet both its market and affordable housing needs. The site is considered suitable for both market and affordable housing, and there is also the opportunity to provide land to expand the primary school and/or provide local employment.

Existing Settlement Character

4.21 This Chapter of the Neighbourhood Plan provides a summary of the existing settlement, including its built heritage.

4.22 It notes at paragraph 3.4 that *“There is also a Scheduled Ancient Monument (SAM) to the north of the village (a moated site and associated fishpond) to the south east of Barrow Hall, which is a fundamental constraint to any further growth to the north of the village.”*

4.23 Whilst the historic importance of this site is and should be recognised, this should not be seen as a fundamental constraint to growth in the north of the village.

Policy BCD1 – The Spatial Planning Strategy

4.24 As noted throughout this response, we consider Site BD5 should be allocated for development and are of the view that it is a better strategic option than the mixed use site allocation at Barrow Hill which would result in increased traffic generation through the village. Policy BCD 1 should therefore be updated to reflect this.

Policy BCD2 – Strategic Allocation: Land at Barrow Hill

4.25 We do not consider that this site is the most suitable option for development and instead this policy should be replaced with a specific policy for Land between Colethorpe Lane and Church Road. The site is considered to be a more suitable location for additional growth which is also in a location that is preferred by villagers as evidenced in the results of the

Neighbourhood Questionnaire. The site is located to an existing facility which is important to the village and would avoid the need for vehicles to travel through the village as would be required by the existing allocation.

Policy BCD5 – Development and High Quality Design

- 4.26 This policy is supported in principle, however, it is suggested that criteria (i) is amended to better reflect local policy as follows:

“Provide a good mix of homes in accordance with the most up to date housing needs assessments.”

Policy BCD7 – Local Employment Strategy

- 4.27 The site is considered suitable, available and achievable for high quality housing including policy compliant affordable housing, open space and land for the extension of the primary school and/or employment uses.
- 4.28 The southern portion of the site is allocated for employment in the adopted Development Plan and the emerging Local Plan. If the site is not to be allocated for housing to include land for the extension of the primary school, we would expect the allocation for employment to be retained in accordance with adopted policy and in compliance with the Basic Condition (e) which requires general conformity with strategic policies contained in the development plan.

Policy BCD8 – Support for New and Existing Community Facilities

- 4.29 This policy notes that the expansion of the primary school and preschool facilities and the provision of enhanced school drop-off/pick-up facilities will be ‘particularly supported’. Land between Colethorpe Road and Church Road site can provide much needed land to support both of these objectives. Land assembly is a key constraint to future expansion of the school and so the allocation of the site could provide the land for this, which would future proof any development on the site.

Policy BCD10 - Ecology and the Natural Environment

- 4.30 Criteria iii of this policy requires all new housing development of five units or more to contribute towards the improvement of local wildlife sites.
- 4.31 If this criteria is to be included, more details need to be provided. For example, will developers be expected to provide a financial contribution and, if so, how will this be calculated? It is also worth noting that there are currently no designated local wildlife sites in the Neighbourhood Plan area and thus it is arguable that any contribution would be contrary to the CIL 122 Regulations.

Policy BCD11 – Protection of Local Heritage Assets

- 4.32 Whilst we recognise and support the desire to protect the village's heritage assets, this policy does not currently comply with the NPPF.
- 4.33 Policy BCD11 requires proposals which indirectly, but are proximate to, listed buildings or other heritage assets, to provide justification for the works, and should provide evidence that any impact of the proposed development is clearly outweighed by the public benefits.
- 4.34 In accordance with paragraph 201 of the NPPF, where a proposal will lead to substantial harm (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 4.35 Paragraph 202 of the NPPF notes 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.
- 4.36 It is considered that this policy should be amended to more clearly reflect the levels of harm and the assessment of the harm against public benefits in accordance with the NPPF.

Policy BCD12 – Active Transport and Accessibility

- 4.37 We welcome the objectives of the policy to improve active travel and encourage the use of public transport.
- 4.38 As part of any proposal, Fleur-Hill will look to provide sustainable transport measures by improving footpath connections to the village and encouraging the use of public transport for new residents. It is also possible that we will be requested to make a financial contribution towards bus services in the village.
- 4.39 However, it is important to recognise that the Parish is in a rural location and unless there is significant investment by West Suffolk, Suffolk County Council and the Government in public transport and active travel, then some residents are going to be reliant on the private car. We therefore question the effectiveness of criteria (ii) which seeks to minimise on plot parking provision in relation to adopted Local Plan standards and make allowance for possible reductions in car parking standards over time. Such an approach can lead to increased off-street parking giving the appearance of a car dominated development with vehicles scattered across streets.

5. CONCLUSION

- 5.1 Fleur-Hill would like to acknowledge the hard work and effort that the Steering Group and the local community have put into producing the Regulation 14 Draft Neighbourhood Plan and the accompanying supporting documents.
- 5.2 However, we are disappointed that despite Land between Colethorpe Road and Church Road being identified as the preferred location for new housing by the majority of residents in the Consultation Questionnaire, the site has not been allocated for development.
- 5.3 Our proposals have the potential to bring forward significant benefits.
- 5.4 The delivery of this site for housing can provide land for the primary school. Evidence suggests that the existing school site is woefully small and is already of a sub-standard size to accommodate a 1FE primary school. Furthermore, the addition of 170 new homes to the village on Land to the East of Barrow Hill (or elsewhere) would mean that unless the school expands, pupils that would have expected a place from further afield or within the edges of the catchment would no longer be able to secure a place. Discussions with the school and Suffolk County Council have confirmed that additional land would be welcomed to enable them to expand and improve the current educational offer.
- 5.5 Another key benefit of the site is its location to the north-west of the village close to the A14. This means there will be less traffic through the village at peak times, something residents welcomed during initial consultation.
- 5.6 Other benefits as outlined in the accompanying Vision Document include:
- Provision of around 95 new homes in a mix of sizes to help meet local need.
 - Mixed use modern rural employment land as part of mixed use development to meet current and future work patterns or school expansion land, if required.
 - 35% affordable home provision in line with the emerging Local Plan policy.
 - Sustainable location adjacent to the school and within a 10 minute walk of the Village Hall, Church, Village Green, and Premier Stores.
 - Opportunity to offer enhanced pedestrian and cycle links for the benefit of both existing and future residents.
 - Provision of additional publicly accessible open space for the community to enjoy.
 - Potential for additional traffic calming to be introduced along Colethorpe Lane as part of the proposals, subject to agreement with the County Council.
 - Potential s106 contributions for the Parish Council to help deliver additional cycle and pedestrian infrastructure around the village.
 - Development in a location that does not cause coalescence of Denham and Burthorpe.
 - High-quality and well-designed homes that are sympathetic to the existing village.
 - Opportunity to enhance gateway to Barrow with high quality designed houses and landscape.

- 5.7 The Neighbourhood Plan has allocated Land at Barrow Hill in preference to Fleur-Hill's site. However, although Land at Barrow Hill is allocated in the emerging Local Plan, this does not mean the Neighbourhood Plan is obliged to allocate this site if it is considered a more suitable alternative is available.
- 2.23 Support for this site's development was echoed at a public exhibition Fleur-Hill held in March 2023. The response from local residents, both verbally at the consultation and via written responses, was overwhelmingly positive and in favour of the proposed development.
- 90% of respondents considered the Colethorpe Lane Development as being within their preferred 'development zone' within the village;
 - 92% of respondents outlined their preference as the Colethorpe Lane site over the Barrow Hill and Bury Road site;
 - 81% of respondents considered that the extra land being offered to the school was important for the village.
- 5.8 Having reviewed the evidence base prepared in support of the Plan, we question the impartiality of the Site Options Assessment Draft Report. This does not assess the sites submitted against the same criteria and relies too heavily on the emerging Local Plan evidence base which is still in its early stages of preparation and has not been tested at examination.
- 5.9 We look forward to engaging on the next stage of the Neighbourhood Plan and would be pleased to discuss these matters directly with the Parish Council and the Steering Group should this be desired. Evidence collated by Fleur-Hill and the Neighbourhood Plan Group clearly shows a strong preference for the development of this site over others in the village. If the Neighbourhood Plan does not have the support of local residents, there is a strong chance the Plan may not be supported at the referendum stage.

**Barrow neighbourhood plan consultation**

1 message

23 October 2023 at 17:45



Dear Ms. Chilton,

Please accept this email as a strong objection to the proposed Barrow-cum-Denham Parish Council [PC] Neighbourhood Plan [NP].

I do not wish my comments to be publicly attributable to me.

The NP is irrational; has failed to have due regard for material considerations; is based on procedural impropriety and a biased approach.

The following list supports this statement. I believe:-

1. The PC gave NP information to the PC Vice-Chair (a landowner) thus providing her with an unfair advantage over other landowners.
2. The PC Vice-Chair did not declare her business interests or family connections with other owners of the NP's allocated site. The PC Vice-Chair partnered with other landowners to promote land at Barrow Hill in West Suffolk's recent LP process.
3. The PC Vice-Chair did not declare a relevant pecuniary interest at some PC Meetings.
4. The PC Vice-Chair took part in PC Meetings where she had a pecuniary interest by taking minutes.
5. The PC's Standing Orders on Code of Conduct & Dispensations (Section 13) has been breached by the PC Vice-Chair and another Councillor (who has previously but not consistently declared an interest in the land at Barrow Hill) on numerous occasions during the NP process.
6. The NP has not chosen the most sustainable/suitable site and the reasons are irrational and contrary to the evidence.
7. The PC's rejection of the Denham Lane site because of coalescence is irrational and contrary to the evidence. The small, elongated site is bounded on 3 of its 4 sides by Barrow's settlement boundary. AECOM's report suggests the site would form a 'defensible barrier' to the threat of coalescence.

8. The NP site is unnecessarily large compared to the area used by the emerging Local Plan (LP). By selecting an excessively large, greenfield site the PC has failed to have due regard to parishioners' views on the protection of green space and the environment from the parish questionnaire.
9. The inclusion of a substantial, new employment area in the preferred site is irrational, contrary to the evidence and fails to consider the current planning allocations & two permissions for substantial office buildings at Barrow Hill & Barrow Hall in Barrow. The NP refers to allocated employment sites in Barrow not coming forward. This is because of low demand and it is irrational to propose a further allocation.
10. The PC has failed to have due regard to material considerations regarding traffic and the site's relation to major transport links – most notably the A14.
11. The provision of a large (5Ha) sports & recreation facility to support site selection is absent from the NP. Contrary to misleading statements in the NP, the provision of additional sports & recreation facilities is not supported by the parish questionnaire.
12. Important information about the West Suffolk Council [WSC] emerging Local Plan [LP] has been omitted from the Consultation. PC Minutes show that the PC has been notified by WSC that if the NP selected sites other than those already selected by WSC's emerging LP that these might be considered in addition to, rather than instead of the LP sites. This important information has been omitted from the Consultation material which suggests a biased approach.
13. The poor ranking of the Bury Road site regarding impact on Historic Environment is based on factual errors. In person examination would clearly show that The Weeping Willow & Barrow House would not be adversely affected. Rather, there is the opportunity to improve the setting with sensitive design of the Bury Road development.
14. The NP site selection has failed to have due regard to material considerations of the Bury Road Site Plan regarding coalescence. The site contains a large open space in its north east sector – this avoiding any threat of coalescence.
15. The NP and supporting consultation information has been drafted by a biased source who would naturally be influenced by commercial pressure to an important client. Turley have previously acted for the landowners (one of whom is an important Turley customer) to promote the Barrow Hill site to West Suffolk.
16. The provision of a care home in the NP is not evidence based and poorly considered.
17. Decisions on site selection are based on personal choice rather than evidence as stated by Cllr. Ford.
18. AECOM's Strategic Environmental Assessment has failed to have due regard material considerations in its Landscape Assessment. During the emerging LP process, WSC discounted the land at Barrow Hill on grounds of *'Landscape impact – proximity to ancient woodland. An alternative site (Bury Road) is considered to be a more suitable and sustainable*

option' (Appendix B of Part 3 of WSC's Regulation 18 Preferred Options 20220). Clearly, the local planning authority found the harm to landscape to be significant enough to warrant omission from its list of preferred sites. Nothing has changed to alter this objective and recent finding. The NP's Strategic Environmental Assessment states that development of the NP's allocated site would perform most favourably from a landscape character perspective is clearly faulty and inconsistent with the emerging LP.

19. AECOM's Strategic Environmental Assessment has failed to have due regard to the damaging impact of the NP's allocated site on footpaths. The assessment is absent from the analysis. Impact on footpaths is considered important by parishioners as stated in the 2020 parish questionnaire.
20. The PC's grounds to reject the site between Colethorpe Lane and Church Road failed to have due regard to West Suffolk Policy DM29.

**Barrow Neighbourhood Plan Consultation**

1 message

23 October 2023 at 19:01

Dear Ms. Chilton,

Please accept this email as a strong objection to the proposed Barrow-cum-Denham Parish Council [PC] Neighbourhood Plan [NP].

I do not wish my comments to be publicly attributable to me.

The NP is irrational; has failed to have due regard for material considerations; is based on procedural impropriety and a biased approach.

The following list supports this statement. I believe:-

1. The PC gave NP information to the PC Vice-Chair (a landowner) thus providing her with an unfair advantage over other landowners.
2. The PC Vice-Chair did not declare her business interests or family connections with other owners of the NP's allocated site. The PC Vice-Chair partnered with other landowners to promote land at Barrow Hill in West Suffolk's recent Local Plan process.
3. The PC Vice-Chair did not declare a relevant pecuniary interest at some PC Meetings.
4. The PC Vice-Chair took part in PC Meetings where she had a pecuniary interest by taking minutes.
5. The PC's Standing Orders on Code of Conduct & Dispensations (Section 13) has been breached by the PC Vice-Chair and another Councillor (who has previously but not consistently declared an interest in the land at Barrow Hill) on numerous occasions during the NP process.
6. The NP has not chosen the most sustainable/suitable site and the reasons are irrational and contrary to the evidence.
7. The PC's rejection of the Denham Lane site because of coalescence is irrational and contrary to the evidence. The small, elongated site is bounded on 3 of its 4 sides by Barrow's settlement boundary. AECOM's report suggests the site would form a 'defensible barrier' to the threat of coalescence.
8. The NP site is unnecessarily large compared to the area used by the emerging Local Plan (LP). By selecting an excessively large, greenfield site the PC has failed to have due regard to parishioners' views on the protection of green space and the environment from the parish questionnaire.
9. The inclusion of a substantial, new employment area in the preferred site is irrational, contrary to the evidence and fails to consider the current planning allocations & two permissions for substantial office buildings at Barrow Hill & Barrow Hall in Barrow. The NP refers to allocated

employment sites in Barrow not coming forward. This is because of low demand and it is irrational to propose a further allocation.

10. The PC has failed to have due regard to material considerations regarding traffic and the site's relation to major transport links – most notably the A14.
11. The provision of a large (5Ha) sports & recreation facility to support site selection is absent from the NP. Contrary to misleading statements in the NP, the provision of additional sports & recreation facilities is not supported by the parish questionnaire.
12. Important information about the West Suffolk Council [WSC] emerging Local Plan [LP] has been omitted from the Consultation. PC Minutes show that the PC has been notified by WSC that if the NP selected sites other than those already selected by WSC's emerging LP that these might be considered in addition to, rather than instead of the LP sites. This important information has been omitted from the Consultation material which suggests a biased approach.
13. The poor ranking of the Bury Road site regarding impact on Historic Environment is based on factual errors. In person examination would clearly show that The Weeping Willow & Barrow House would not be adversely affected. Rather, there is the opportunity to improve the setting with sensitive design of the Bury Road development.
14. The NP site selection has failed to have due regard to material considerations of the Bury Road Site Plan regarding coalescence. The site contains a large open space in its north east sector – this avoiding any threat of coalescence.
15. The NP and supporting consultation information has been drafted by a biased source who would naturally be influenced by commercial pressure to an important client. Turley have previously acted for the landowners (one of whom is an important Turley customer) to promote the Barrow Hill site to West Suffolk.
16. The provision of a care home in the NP is not evidence based and poorly considered.
17. Decisions on site selection are based on personal choice rather than evidence as stated by Cllr. Ford.
18. AECOM's Strategic Environmental Assessment has failed to have due regard material considerations in its Landscape Assessment. During the emerging LP process, WSC discounted the land at Barrow Hill on grounds of *'Landscape impact – proximity to ancient woodland. An alternative site (Bury Road) is considered to be a more suitable and sustainable option'* (Appendix B of Part 3 of WSC's Regulation 18 Preferred Options 20220). Clearly, the local planning authority found the harm to landscape to be significant enough to warrant omission from its list of preferred sites. Nothing has changed to alter this objective and recent finding. The NP's Strategic Environmental Assessment states that development of the NP's allocated site would perform most favourably from a landscape character perspective is clearly faulty and inconsistent with the emerging LP.
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20. The PC's grounds to reject the site between Colethorpe Lane and Church Road failed to have due regard to West Suffolk Policy DM29.

36 pages
including this one

PC 54



[Redacted]

Neighbourhood Plan Consultation

1 message

[Redacted]

23 October 2023 at 20:57

Please see attached letter.

Yours sincerely,

[Redacted]



NEIGHBOURHOOD_PLAN_REG_14_CONSULTATION_REV_1.0.pdf

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DOC. REF. = NEIGHBOURHOOD_PLAN_REG_14_CONSULTATION_REV_1.0

Dear Ms. Chilton,

**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 this letter as a strong objection to the proposed Barrow-cum-Denham Parish Council [PC] Neighbourhood Plan [NP].

Generally, the NP contradicts the evidence in its supporting documents such as the PC's Report on Responses to Questionnaire, AECOM's Strategic Environmental Assessment and AECOM's Site Options & Assessment. More specifically, the NP is irrational; has failed to have due regard for material considerations; is based on procedural impropriety and a biased approach.

The following list supports this statement. The list is in no particular order and, given the time limitations of the Consultation, is not exhaustive. The list may be subject to amendment, addition or modification in any further consultations, hearings, actions or proceedings. I believe:-

1. **Procedural propriety was not observed in the site selection process because the PC gave preferential treatment to the PC Vice-Chair who owns part of the NP Site.**

Minutes of the PC Meeting from 1 November 2021 state “*Cllr Steer has joined the NHP Sub Committee. Cllr Kronbergs to forward all relevant documentation to her.*” The ‘relevant documentation’ would have provided Cllr. Steer with an unfair advantage over other landowners as it would have contained information about the NP and the PC did not make the same information available to other landowners. A large lever-arch folder of NP information was handed to Cllr. Steer by Cllr. Kronbergs and this was observed by a member of the public attending the PC Meeting. If Councillor Steer subsequently received further emails or information concerning the NP, which other landowners did not concurrently receive, this would have given her a further, unfair advantage. Notably, at the time of her joining the PC, Cllr. Steer’s site had been rejected by the PC but was subsequently selected after she volunteered to join the NP Steering Committee.

2. **Procedural propriety was not observed because the PC Vice-Chair did not declare their business interest with other landowners.** In December 2020, Land off Barrow Hill, Barrow (West Suffolk Council (WSC) SHELAA Ref: WS012a & WS228) was submitted as part of WSC’s Call for Sites in the emerging Local Plan (LP). Notably, the document is a Turley document and is available to view on WSC’s web-site. Cllr. Steer’s business interest with another landowner is evident from page 2 of the Delivery Statement which reads “*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.*” The similarity to the NP proposal is clear. Cllr. Steer volunteered to join the NP Steering Committee (see Minutes of the PC Meeting 1 November 2021) and the NP’s allocated site includes her land and land owned by Mr. & Mrs. Stanton.
3. **Procedural propriety was not observed because the PC Vice-Chair did not declare their family relationship with other landowners.** I understand that Mr. William Phizaklea is

Cllr. Steer's brother and that he owns the site east of Barrow Hill (BD6) which forms part of the NP's site. Given its high degree of relevance to the NP, it is regrettable that Cllr. Steer chose not to declare this familial relationship. Under UK Government's Guide on Openness & Transparency on personal interests *'Holders of public office ...should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.'* Notably, the three sites selected by the PC are classed as single site in the NP under a group of owners which include Cllr. Steer & Nigel Steer, William & Sophie Stanton and William Phizaklea.

4. **Procedural propriety was not observed because the PC Vice-Chair did not declare a relevant pecuniary interest at various PC Meetings.** Councillor Steer and her partner, Nigel Steer, own land east of Barrow Hill and public records show her registration of this pecuniary interest with WSC when she became a parish councillor. This site was submitted as part of the NP Call for Sites in 2020. Councillor Steer was co-opted on to the PC on 6 October 2021 and subsequently joined the NP Steering Committee (see Minutes of PC Meeting from 1 November 2021). PC Records show the NP as an agenda item for PC Meetings including 14 October 2021, 1 November 2021, 7 March 2022 and 4 April 2022. Councillor Steer attended these meetings but did not declare her interest. This is an important failure of procedural propriety because if she had declared her interest at the 14 October & 1 November 2021 PC Meetings, this would likely have prompted other councillors to speak out against her joining the NP Sub-committee and, as a consequence, she would not have received the NP documentation which gave her an unfair advantage.
5. **Procedural propriety was not observed because the PC Vice-Chair took part in relevant aspects of PC Meetings where she had an interest.** Given Cllr. Steer's pecuniary and other interests, it is notable that she volunteered to join the NP Steering Committee. She also took the minutes at the 25 April 2023 PC AGM (where the NP was discussed); took the minutes of 15 May 2023 PC Meeting (where she declared a pecuniary interest in the NP); took the minutes of the 5 June 2023 (where she declared a pecuniary interest in the NP) and at the 7 November 2022 Meeting she seconded the 3 October 2022 PC minutes (in which she had

declared a pecuniary interest in the NP). Notably, the 3 October 2022 Meeting is a key meeting in the PC's site selection process and the PC's adoption of those minutes is a significant step. Minutes taken by Cllr. Steer contain errors and omissions which are helpful to selection of her land. For example, her minutes for PC Meeting of 15 May 2023 state that Cllr. Kronberg (a well-respected and independently minded Councillor, who had voiced his opposition to Barrow Hill site selection) attended and took the minutes. He did not. He was not present at that meeting because he had resigned from the NP Steering Committee over the PC's selection of the Barrow Hill sites against the advice from independent experts and he did not re-apply to be a councillor in the newly formed Council. Further, PC Minutes of 5th June 2023 taken by Cllr. Steer omit an important NP report as an appendix.

6. **Procedural propriety was not observed because the PC's Standing Orders on Code of Conduct & Dispensations has been breached by the PC Vice-Chair on numerous occasions during the NP process.** Section 13 of the PC's Standing Orders dated March 2021 covers the procedure for councillors with an interest or pecuniary interest when attending PC Meetings. The PC's Standing Orders read:-

a. All councillors and non-councillors with voting rights shall observe the code of conduct adopted by the council.

b. Unless he has been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which he has a disclosable pecuniary interest. He may return to the meeting after it has considered the matter in which he had the interest.

c. Unless he has been granted a dispensation, a councillor or non-councillor with voting rights shall withdraw from a meeting when it is considering a matter in which he has another interest if so required by the council's code of conduct. He may return to the meeting after it has considered the matter in which he had the interest.

d. Dispensation requests shall be in writing and submitted to the Proper Officer as soon as possible before the meeting, or failing that, at the start of the meeting for which the dispensation is required.

e. A decision as to whether to grant a dispensation shall be made by a meeting of the council, or committee or sub-committee for which the dispensation is required and that decision is final.

Cllr. Steer did not declare an interest at some PC Meetings where the Neighbourhood Plan was an agenda item (as detailed above). Cllr. Steer did declare an interest at other PC Meetings where the Neighbourhood Plan was an agenda item but there is no record of her withdrawing from any PC Meeting (including those Meetings where she took the Minutes). Similarly, there is no record of her returning to the Meeting following the relevant agenda item. There is no record of a dispensation for Councillor Steer. Given the above, Section 14 of the Standing Orders should now be enacted.

- 7. Procedural propriety was not observed because Councillor Wesley has not consistently declared an interest at PC Meetings and has breached the PC's Standing Orders during the NP Process.** In making this statement, it is noted that Cllr. Wesley is a very active and highly valued councillor whose practical efforts do a great deal to support the local community in Barrow. I believe that he has been badly advised by the PC Chair and the Parish Clerk regarding declarations of interests and the PC's standing orders. Nevertheless, his employment by a landowner at Barrow Hill, means that he has an interest in matters relating to the NP, which was confirmed by Cllr. Wesley himself, when he declared his interest at the PC Meeting in April 2019. Since then Cllr. Wesley has attended numerous PC Meetings but has not declared an interest in NP agenda items. He does not withdraw from the meeting when NP matters are discussed – as required by PC Standing Orders Section 13. There is no record of a dispensation for Cllr. Wesley not to withdraw from PC Meetings following his declaration of an interest. Furthermore, he has taken part in PC proceedings which relate to his interest. For example, he has accepted or seconded the minutes of previous

PC Meetings which have recorded important NP decisions, including PC Minutes from 6 October 2021, 14 October 2021 (a key NP decision meeting) and 11 April 2023 (which includes the questionable decision to appoint Turley as planning consultants to the NP – see #20).

8. **Procedural propriety was not observed because the PC Chair has made false and misleading statements in relation to the NP.** PC Meeting Minutes show that the PC Chair stated that it would be “illegal” for the PC to consider land at the north of the village. Consideration of the land is not illegal and for the PC Chairman to claim such is false, misleading and indicates bias.

Minutes from the PC Meeting of 5 September 2022 records that the PC Chair ‘*reminded residents that the Neighbourhood Plan will not stop development. 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 were to vote against the NP, the parish might be subject to large scale over-development. Prior to September 2022, WSC had published and consulted on (modest) site allocations in their emerging LP for preferred sites at Denham Lane and Bury Road. Therefore, the actual situation is the opposite of the PC Chair’s statement:– should the NP (as currently drafted) go forward, the village will be ‘exposed’ to development under WSC’s LP plus development under the PC’s NP.

PC Meeting Minutes record the PC Chair stating that he would be unaffected by development because of his home’s central location. This is a false and misleading statement because the PC Chair’s home is located on Denham Lane. The Denham Lane site begins roughly 100m from his home and the traffic from the site would likely pass his home.

Rather than a fair and reasonable approach by the PC Chair, his statements indicate a biased approach.

9. **The NP has not chosen the most suitable/sustainable site and the reasons are irrational and contrary to the evidence.** AECOM’s Strategic Environment Assessment (SEA) is a supporting document for the NP. Table NTS2 clearly shows that the site selected in the NP performs significantly less well than other options. After correction of some factual errors

regarding the Bury Road site's impact to Historic Environment (see #17 in this document) the NP's preferred site will compare even more poorly to other, more suitable options than currently shown. The best performing options align with the findings and preferred sites in West Suffolk's emerging Local Plan [LP]. This is unsurprising because AECOM were the planning experts in both cases and have used a similar site selection process. Other than factually incorrect statements on coalescence (see #11 and #18 in this document), the NP contains no clear, logical or substantive statement as to why a less sustainable/suitable site selection has been made.

Comments recorded in PC Meeting Minutes suggest that some PC Councillors believe that potential developers of this site would bestow greater benefits for the community in the form of sports & recreation facilities and monetary contributions. However, the additional sports facilities are not included in the proposed Concept Plan and the nature, scope and location of the facilities are not described. The NP's policies are worded so that there is no requirement to provide any sports/recreation facility. Any facilities (play space & allotments) included in the NP concept plan are of a scale and location that they would only meet the needs of residents on the new site, not the existing residents and therefore they do not present a benefit to the existing community.

The PC's Report on Responses to Questionnaire and particularly Question 15 is relevant since it is evidence of only a small minority demand for sports/recreation facilities (in addition to those already in Barrow).

Any community facilities specified within the NP Concept Plan are comparable to those suggested by (the more sustainable) Bury Road site plans. There is no reason that additional community facilities would be substantially greater from the NP's proposed site than from other sites.

The PC does not have any contractual undertakings from the landowners about the provision of any such facilities.

During the emerging LP process, WSC discounted the land at Barrow Hill on grounds of *'Landscape impact – proximity to ancient woodland. An alternative site is considered to be*

a more suitable and sustainable option' (Appendix B of Part 3 of WSC's Regulation 18 Preferred Options 20220). Clearly, the local planning authority found the harm to landscape to be significant enough to warrant omission from its list of preferred sites and perhaps reflects concerns raised in its consultation regarding Barrow Hill's visibility from a distance, particularly from Barrow's southern approaches. Nothing has changed to alter this objective and recent finding. The subsequent and unsubstantiated view of the NP's Strategic Environmental Assessment that development of the NP's allocated site would perform most favourably from a landscape character perspective is clearly faulty and inconsistent with the emerging LP.

Accordingly, the reason for selecting a less sustainable site is both irrational and not based on evidence.

- 10. Procedural propriety was not observed because policies were not developed and approved by the PC prior to site selection.** PC Meeting Minutes show no record of policies being approved before site selection. Rather, the chronology and content of PC Minutes suggest that NP policies have been drafted following site selection to suit the preferred site. PC Minutes of 15 May 2023 state that Turley's scope of works include '*policy formulation and drafting of proposed NP site specific policies and other general planning policies*'. At the PC Meeting of 2 October 2023, in answer to my question, the PC Chairman clarified that policies had been written by Turley. Importantly, these activities postdate the PC's selection of the NP's preferred site.

Planning Direct had previously informed the PC that site selection must be policy and evidence based the evidence did not support the choice of the Barrow Hill site.

- 11. The PC's rejection of the Denham Lane site is irrational.** AECOM carried out a Site Options & Assessment study and the subsequent report, dated September 2021, is a supporting document for the NP. AECOM's Report states the Denham Lane site is clearly suitable for allocation. The PC called an extraordinary PC Meeting on 14 October 2021 to include discussion of AECOM's report. Minutes of the Meeting show that Denham Lane