

site (BD9) was rejected by the PC as it would ‘close the gap between Barrow and Denham’.

The Denham Lane site is shown below:-

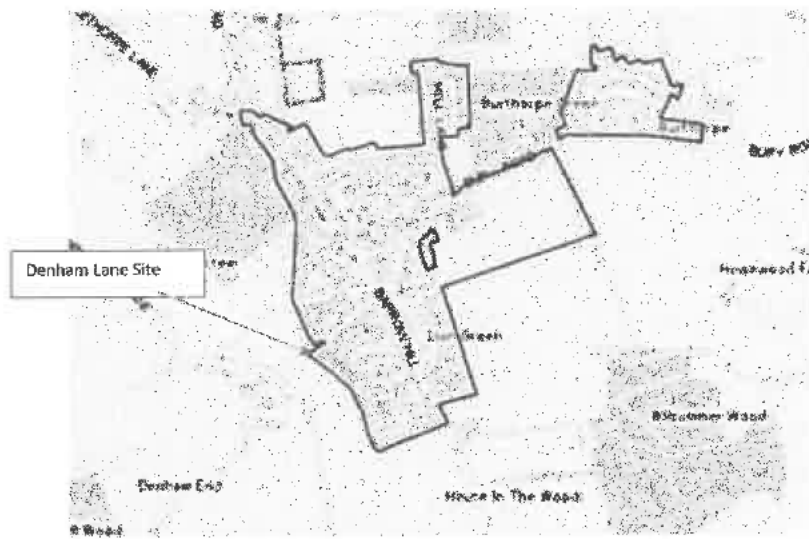


Figure 1. Illustration of Denham Lane site's size and location (superimposed on to map of potential future settlement boundary from WSC's consultation on Local Plan, 8 June 2022)

It is a small site (0.66Ha); suitable for around 20 dwellings; 3 of its 4 edges adjoin the Barrow settlement boundary and 3 of the 4 edges are bounded by existing development as shown in Figure 2. Its shape and location means that erosion of any green space between Denham End and Barrow is minimal and the change to Barrow's settlement boundary is not significant. Notably, Denham End does not have a settlement boundary. NP Supporting Document, AECOM Site Options & Assessment Report states *“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 with Denham End.”* Rejection of this site on grounds of coalescence of Denham End and Barrow is irrational and contradicts the evidence in supporting documentation.



*Figure 2 – aerial view of the Denham Lane site showing its location & close relation to the built environment.*

Notably, given the site's high suitability it has been selected by WSC in the emerging Local Plan. WSC's selection is based on evidence from their own site assessment which includes deferring sites which would coalesce settlements. National Planning Practice Guidance on Neighbourhood Planning states *'Although a draft neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be a relevant consideration of the basic conditions against which a neighbourhood plan is tested'* (Paragraph 009 Reference ID 41-009-20190509 Revision date 09-05-2019). PC Meeting Minutes suggest that the WSC's evidence for including this site as a preferred option in the emerging LP has not been considered. This should have been considered under National Planning Practice Guidance on Neighbourhood Planning:- *'Although a draft neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be a relevant consideration of the basic conditions against which a neighbourhood plan is tested'* (Paragraph 009 Reference ID 41-009-20190509 Revision date 09-05-2019).

- 12. The preferred site is unnecessarily large and the PC has failed to have due regard for material considerations on the protection of green space and the environment.** The PC's Report on Responses to Questionnaire is a supporting document for the NP. Questions

34 to 40 of the PC's Consultation Questionnaire relate to protection of the environment. For example, question 40 asked whether respondents strongly agreed, agreed, disagreed or strongly disagreed with the statement '*Green space around Barrow-cum-Denham should be protected from development.*' The PC's Consultation Report noted a '*high degree of consensus*' with '*an average of 97.5% of respondents either agreeing or agreeing strongly with the (environmentally protective statements) in questions 34-40*'. The NP proposes 3 substantially green-field sites as a single site totalling 13.6Ha which could potentially house 408 dwellings (at 30dpH). This compares to the emerging LP which allocates 26% less land (at Bury Road & Denham Lane) to accommodate sufficient houses to meet or exceed Barrow's Housing Requirement. The emerging LP's Preferred Options also has the benefit of splitting the housing need across two sites in separate parts of the village. In contrast, the NP option would see the development of a much larger, single tract of land.

Even excluding a potential 5Ha for an additional sports & recreational site, the NP therefore proposes an unnecessarily large area to meet the housing requirement. Finally, question 31 of the parish questionnaire shows that 4,6% of respondents wanted to see large-scale development. Accordingly, the PC has not taken due regard of its own evidence.

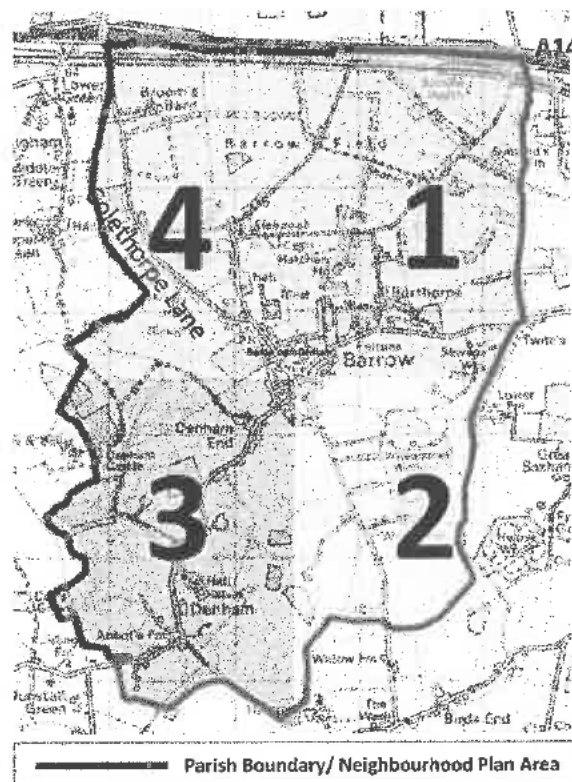
- 13. The inclusion of a substantial, new employment area in the preferred site is irrational, contrary to the evidence and fails to consider current planning matters.** Question 19 of the parish questionnaire show that 63.8% of respondents agreed or agreed strongly that having local employment opportunities was important and Question 16 of the parish questionnaire shows that 81.2% of respondents either agreed or agreed strongly that that Barrow has sufficient business premises. Planning additional business premises is therefore irrational especially given that a site for Barrow Business Park has already been allocated; planning permission is already granted for large offices at Green Farm Barrow Hill (DC/18/0252/FUL) and planning permission is already granted for a substantial office building at Barrow Hall (DC/20/1396/FUL).

The NP makes repeated reference to employment site allocations in Rural Vision 2031 not coming forward for development. These allocations were introduced in 2015 and the lack

of take-up indicates a lack of local need or appetite for employment premises. Further evidence for this can be found in West Suffolk's Employment Land Review 2021 regarding Barrow Business Park which states that 'There are no obvious sources of new demand for such a site'. In light of these unused employment allocations, it is irrational to plan for further employment sites without compelling evidence for need or justification. The NP does not contain any compelling evidence for need or justification.

More generally, commercial premises are in over-supply given the widespread shift to home home-working for many in the UK.

14. **The PC has failed to have due regard to material considerations regarding traffic.** The PC's 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:-



*Fig. 3. Map of the Parish in 4 geographic sectors.*

The north west sector (4) was, by far, the most preferred, being more than three times more popular than the sector in which the preferred site is located. Question 33 asked parishioners their reason for their preference. The most frequent response at roughly three times the next most frequent (single) reason was traffic & transport. The PC's Report on Questionnaire Responses cites typical reasons for the respondents' sector preference as "*Minimises traffic through village*"; "*Close to transport links*"; "*Close to commuter routes*" or "*Close to A14*". As stated in Section 3.5 of the NP, the main access to Barrow is via Colethorpe Lane (i.e. the main north-south road between Barrow and A14 or towards the A11). The logical extension of this is that Colethorpe Lane is also the main access out of Barrow and hence the busiest road. The NP's preferred site is to the south of the village which would mean much of the additional traffic on this main access route would pass through the full length of the village. Notably, the Bury Road site would produce a smaller traffic impact on the village given its close proximity to two bus stops; traffic to Colethorpe Lane need only travel from the centre of the village; some traffic (to/from Bury) would naturally travel along Bury Road and traffic would only be from housing. This compares with traffic from the NP's preferred site which would include traffic from housing, industrial/office areas, care home and possibly additional sports/recreation facilities. The use of public transport by residents and workers of the preferred is likely to be limited because of its distance from public transport routes.

Insufficient consideration has been given to access, traffic congestion and safety at the NP's site from Barrow Hill. The number of access points to the main part of the NP's site is limited to 1 whereas AECOM's Site Options & Assessment of the Bury Road site shows potentially 4 access points : 1 on Bury Road, 1 on to Lion Green and 2 on to Dale Tree Road, which would diffuse traffic movements and limit harm to the proper functioning of the local highway network.

Accordingly, the PC has failed to have due regard for its own evidence regarding traffic.

- 15. The provision of additional sports & recreation facilities to support the NP's selection of less sustainable site runs contrary to the evidence.** Barrow already has a sports &

recreation area between the centre of the village and the school comprising sports pitch, children's play area, tennis courts and skate park. The area is well used and well-liked. Responses to Question 15 of the Questionnaire showed that 74.9% of respondents, agreed or agreed strongly that Barrow-cum-Denham had sufficient sports & leisure facilities. Responses to 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. Only 19 of the 169 comments in Question 26 related to either improved or additional sports facilities and these include requests for a ski slope, bowling green and a swimming pool. The information presented in Section 3.70 of the NP is illogical and worded so as to give a misleading and biased impression of the parish's views. The comment about the questionnaire being restricted to adults is irrational since the PC deliberately took this decision so as to avoid difficulties from collecting data of minors. It is also irrational to suggest that adults would not consider their children, grandchildren, nephews or nieces when answering such questions.

It is entirely inappropriate and illogical that the NP, having failed to consult the younger population, would then make bold assumptions about what the younger generation's needs and desires might be, had they been consulted. Clearly, given that the NP acknowledges that 20% of the population is under the age of 16, there is an outstanding need to consult with younger people if the NP is genuinely to reflect their needs. Notably, the NP intends to cover the period 2019-2041. By 2041, today's 16 year olds will be about 34 and today's 10 year olds will be about 28. This generation will shape the future of Barrow. The NP should be considered as their plan and their views ought to be heard and taken on board.

The NP's own supporting evidence shows that there is no significant demand for additional sports & recreation facilities. Accordingly, a key reason for selecting a less sustainable site is irrational.

- 16. Important information about WSC's emerging LP has been omitted from the Regulation 14 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 Regulation 14 Consultation material and demonstrates a bias and lack of transparency.

National Planning Practice Guidance on Neighbourhood Planning indicates that this information should be considered: *'Although a draft neighbourhood plan is not tested against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be a relevant consideration of the basic conditions against which a neighbourhood plan is tested'* (Paragraph 009 Reference ID 41-009-20190509 Revision date 09-05-2019).

The PC's Report on Responses to Questionnaire shows there is no local appetite for further housing growth. Whilst the NP is bound by the minimum housing requirement set by WSC, the potential implications for allocating additional sites to those allocated by WSC (i.e. more than doubling the number of houses over the plan period) has not been widely explained to the local community, nor has the local community's views been sought. The response to the PC's 2020 Questionnaire suggests that it is very likely the community would not support this approach.

On a separate but related note, the NP is silent on the derivation of the 170 dwellings. This is in clear conflict with national planning guidance.

- 17. The poor ranking of the Bury Road site regarding impact to the Historic Environment is based on factual errors.** AECOM's Strategic Environmental Assessment ranks Option B (Bury Road) and Option E (Bury Road & Denham Lane) as equal 4<sup>th</sup> on impact to historic environment. This is based on the Bury Road site being *'...potentially within the setting of the Grade II listed The Weeping Willow Public House and Grade II listed Barrow House & Carriageway'*.



Fig. 4 – view of built environment adjacent to the Weeping Willow

As can be seen above, The Weeping Willow Public House is adjacent to a truck parts industrial building with no architectural value; a substantial telephone exchange with no architectural value and a mobile phone mast. Furthermore, the Public House has recently built a number of chalet style buildings (and associated parking) in the pub garden to accommodate B&B guests. External views of the Weeping Willow from public spaces would be unaffected by development of the Bury Road site.



Fig. 5 – view of Weeping Willow from public footpath on south side of Bury Hill site.

The Old Bakery is directly adjacent to the Weeping Willow and has received planning permission (DC/21/1706/FUL) for a new, 3-bedroomed house. Notably, the PC offered no objection to its construction.

Given that the Weeping Willow is a listed, publicly accessible building, the views from within the building also need to be considered. These are unaffected by development of the Bury Road site. To suggest a more distant development would have an impact on the Weeping Willow's setting is irrational and factually incorrect.

Similarly, Barrow House is nearby Lion Green and a view of the environment is shown below.



Fig. 6 – view of buildings & electrical sub-station near Barrow House

Views of Barrow House from public spaces are unaffected by development of the Bury Road site. To suggest that a more distant development at Bury Road would have an impact on the Barrow House's setting is irrational.

Indeed a sensitively designed development has the potential to enhance the listed buildings' current poor setting by using, for example, generous new planting and an increase in architectural quality relative to the existing development near the listed buildings.

18. **The NP site selection and has failed to have due regard to material considerations of the Bury Road Site Plan.** The NP contains multiple references to the issue of coalescence at other sites. The map below (from WSC LP consultation) shows the Barrow settlement boundary following allocation of Bury Road & Denham Lane sites.

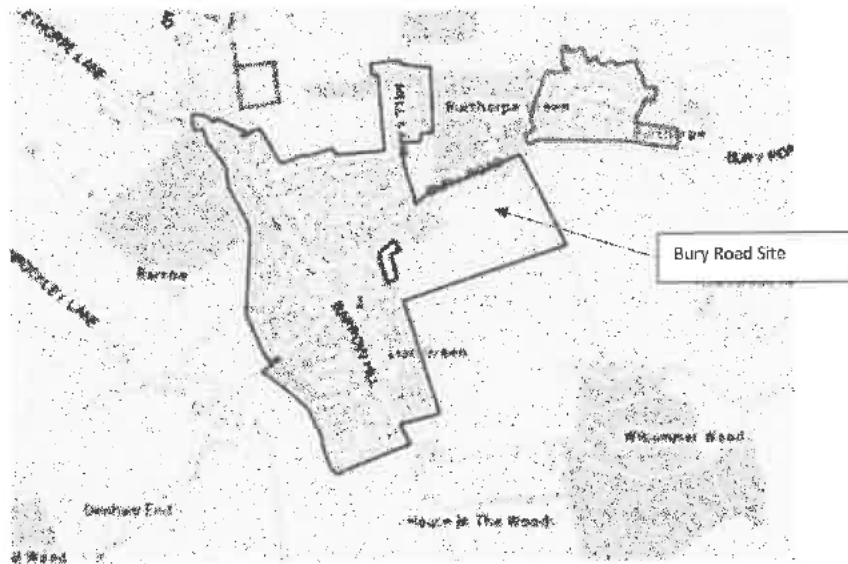


Fig. 7 – WSC map of settlement boundary including Denham Lane & Bury Road sites

As can be seen, the Bury Road site does not coalesce with Burthorpe. Moreover, the Bury Road site plan shows that the threat to coalescence is minimised by the inclusion of a large, green, open space incorporating ponds for a sustainable (and necessary) drainage system at the north east of the site.



Fig. 8. Bury Road site plan showing green space to north east of site.

A similar site map was provided to the PC at the PC Meeting of 5 September 2022. As can be seen, the effect of the green space minimises any threat of coalescence and provides important opportunity for natural habitat and biodiversity. The NP has not considered this important information and, as a result, overstates the issue of coalescence for the Bury Road site.

The Bury Road site is bounded to its north by established dwellings and so would feel better related to and contained by Barrow's established built form. The site is bounded by existing development on 4 of its 6 sides as opposed to the NP site which has only 4 of its 10 sides which are bounded by the village, the rest being onto open countryside. Accordingly, the Bury Road site would not cause the same degree of 'urban sprawl' as the NP's allocated site.

Notably, the WSC LP site selection has examined the Bury Road site and has allocated it in the emerging LP. It is irrational for the NP to reject this site on grounds of coalescence.

19. **The NP contains factual errors with regards to links to public transport.** The NP map of services & facilities omits the bus stops at Papeley Meadow and Sharpes Hill. This gives a false impressions of the Bury Road site having poor connections to public transport. In fact, the opposite is true since the Bury Road site's proximity to two bus stops compares very favourably with Barrow Hill which has no bus stops nearby. Such errors and omissions give the impression that the NP has not been drafted by an independent source (see #20).

20. **The NP and supporting Regulation 14 information has been drafted by a biased source and published without discussion or agreement of the PC.** The PC originally used Planning Direct planning consultants for the NP. The relationship ended when Planning Direct pointed out problems with the PC's site selection process and, in particular, issues relating to the PC's selection of the Barrow Hill site. Turley's Cambridge Office was then selected by the PC to provide similar professional services. Public records suggest that Turley have carried out 30+ projects for Pigeon Investment Management whose founding director, William Stanton, is a landowner at Barrow Hill. The projects include the submission of land at Barrow Hill to WSC's SHELAA in December 2020 on behalf of [REDACTED]



the feasibility of providing medical services to a care home (in addition to further housing development).

The NP cites an expression of interest from a care home operator but this is absent from PC Meeting Minutes. Similarly, PC Meeting Minutes do not include any discussion of a care home as part of the NP.

Provision for later living and care is poorly considered and the policy unduly vague. This lack of due process and absence of evidence for inclusion of care home in to the NP is deeply concerning since it is likely that a similarly lacking approach has been used for other aspects of the Plan.

**23. The NP Concept Plan is misleading and omits important aspects of the proposal such as the new community building and potentially 5Ha of formal recreation ground.**

The Concept Plan effectively camouflages the site and its buildings – this is misleading.

A key driver for the PC's selection of the Barrow Hill site over other, more sustainable sites, appears to be the provision of additional sporting & recreational facilities. These are not shown on the Concept Plan and should therefore be considered as excluded from the Plan. If the provision of a recreation ground has been a factor in the selection of the NP's site, it must now be discounted.

The necessary vehicular access for such a sports & recreation area is also excluded from the Concept Plan. Given that the landowners are proposing a 'community building, formal recreation ground of 5Ha' (*sic* from 5 September 2022 PC Meeting Minutes) it is irrational not to show the location of such a large sport & recreation site. PC Minutes also record the potential for the landowners to allow these additional sports facilities south of the Barrow Hill site at a discounted rent. Such land is on the slope of a hill and therefore unsuitable without large earthworks to level pitches etc. PC Minutes show that the PC has not presented any evidence by way of cost analysis, definitive location, traffic, accessibility or feasibility study on the provision of such a facility. This is a basic prerequisite for considering such a large scale sports facility – particularly if it is to be located on a hill-side.

24. There are no firm or legally binding commitments to provision of sports & recreation facilities etc., and it is therefore irrational for the PC to select a site which is less sustainable than others based on non-binding indications from landowners. For example, PC Meeting Minutes of 5 September 2022 contains statements from the landowners including ‘Wilsummer Wood will be protected and expanded’; ‘homes will be carbon zero’ [sic] and there is to be provision of ‘formal recreation ground of 5Ha’. Notably, the NP does not include any of these provisions.

25. Decisions on site selection are based on personal choice rather than evidence. The selection of the Barrow Hill site was carried by a vote of 4 to 1 at the PC Meeting on 18 October 2022. Councillor Ford was one of the 4 councillors who voted in favour of the site. At the 2023 PC Annual Meeting a member of the public asked the PC about the basis of their site selection. Cllr. Ford replied that his choice of the Barrow Hill site was based on personal choice. His response was later confirmed at the PC Meeting in October 2023 (to date, minutes not yet published) . NP decisions should be based on evidence rather than personal choice. The use of personal choice as a basis for decision making risks the possibility of decisions being influenced by a myriad of other factors.



Fig. 9. Image from Barrow Cricket Club web-site. Circled left to right – Cllr. Rawlings (Head of NP Steering Committee), Cllr. Ford (NP decision based on personal preference) & William Stanton (Barrow Hill landowner & Pigeon Director).

**26. The basis of the Strategic Environmental Assessment (SEA) at 170 houses is irrational because the NP's proposal is based on 170 houses, a care home, employment area and potentially a 5Ha sports & recreation area.** Notably, the NP's preferred site is 13.6Ha which could potentially accommodate 408 houses (at 30 dpH). In order to provide a better basis for comparison and sustainability ranking, the SEA should be reviewed and revised so as to consider the disparity in scale between the NP's preferred site and other smaller, less impactful, more suitable/sustainable sites.

**27. Consultation material contains false and misleading information regarding site analysis.** The NP Regulation 14 consultation material states '*The Neighbourhood Plan intends to promote sustainable growth in Barrow, by focusing on a single, mixed-use strategic site that has been carefully selected on the basis of an independent, comparative site analysis*'. This gives a false and misleading impression that the NP site was independently found to be the most suitable/sustainable when compared to other sites. It does not. AECOM's SEA clearly shows that the NP's preferred option is less substantially less suitable/sustainable than other options. Similarly, the consultation material excludes highly relevant information from WSC's Preferred Sites & Options which select Bury Road & Denham Lane sites.

**28. AECOM's SEA has failed to have due regard material considerations in its Landscape Assessment.** The SEA states '*From a landscape perspective Option C (NP's preferred site) is likely to perform most favourably given the potential to create a neat edge to the south of the village*'. The SEA has failed to consider the proximity of the county wildlife site. It has also failed 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 a distance. The impact on views is most noticeable from the southerly approaches to the village. For illustration, the site would be clearly visible from Chevington Lodge Farm, 1.8miles away – see Figure 10 below. Furthermore, the use of the term 'neat edge' is not a recognised planning term and is so nebulous and subjective as to be nonsensical.



Figure 10 – Aerial view showing large distance from which the site is visible.

Importantly, 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 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.

- The SEA requires correction and the ranking of sites recalculated so as to provide a more accurate view of Option C's poor ranking compared to sites at Bury Road and Denham Lane.
29. **AECOM's SEA section 2.2 is incorrect.** The NP is not being prepared in context of Rural Vision 2031.
30. **Procedural propriety has not been observed because the final versions of the NP and SEA prior to Regulation 14 consultation were not reviewed and discussed by the full PC at a public meeting.** Parishioners have been prevented from examining the NP decision making process and the PC's approach appears rushed, error strewn, procedurally improper and ill-considered. This is evidenced by the PC failing to consult widely with residents and failing to agree policies before site selection. PC minutes from the last 3 PC Meetings are not shown on the PC web-site (as at 20 September 2023) and this indicates a lack of openness by the PC.
31. **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. The site plan is such that the newly proposed buildings are presented so as to appear camouflaged. The location of the newly proposed, additional sports and recreational facilities is not shown. Reference to the site's relatively poor sustainability ranking compared to other sites is also absent. Information relating to WSC's emerging LP is absent. The potential for the site to be considered in addition to Bury Road and Denham Lane sites by WSC or UK Planning Inspectorate is also absent. It would appear that the document's aim is to obfuscate and confuse rather than present a clear picture of the situation. This is neither fair nor reasonable.
32. **The NP's site selection and development process has opened up the PC to legal challenge.** Given the plethora of procedural improprieties, errors and omissions it is likely that landowners or parishioners who believe the PC has acted unfairly, will have solid grounds on which to base a potential legal challenge. Moreover, such challenges are likely to be successful.

33. **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 commensurate consideration and there has been no significant support by the PC for the NP to argue for the preferred area of the Parish. Notably, the site already allocated under Policy RV4 of the current Local Plan had not received commensurate consideration and local residents in the north west of the parish have not been consulted about which type of development they might prefer – light industrial/commercial or housing. Following a complaint about lack of due consideration by the relevant landowner, I understand that a review was carried out by Turley – but the results were somewhat predictable given the commercial situation with the owners of (part of) the preferred site.
34. **The PC's grounds to reject the site between Colethorpe Lane and Church Road failed to have due regard to West Suffolk Policy DM29 & school expansion.** Regarding this site, Accom's Site Options & Assessment states '*.....There is however potential to develop the northern part of the site for rural affordable housing schemes in line with Policy DM29: Rural Housing Exception Sites in St Edmundsbury on sites adjoining or outside the settlement boundary and on the edge of a Key Service Centre where the site is well related to existing community services and facilities (primary school and designated employment area) and is required to meet affordable housing in the locality that cannot be otherwise met*' and '*...On this basis the northern part of the site is potentially suitable as a rural exception site with a small amount of cross-subsidising market homes subject to affordable housing need not being met in the area and discussion with West Suffolk Council on precedents set by designation of Policy RV4 on form and character of the built up area of*

*the village. 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, however the northern part of the site outside the general employment designation is potentially suitable for affordable housing as a rural exception subject to criteria in Policy DM29 been met.* The report goes on to suggest *'...discussion with West Suffolk Council.'* There is no record of the PC discussing policy DM29 provisions with WSC. This is unreasonable given the level of support for development in this sector shown in the PC's Report on Responses to Questionnaire. Whilst the site may not be large enough to accommodate the full housing requirement, the use of this site for housing would have minimised the area of additional land required to meet the housing target, hence satisfying the parish's parallel requirement to protect green space around Barrow (see Question 40 of the PC's Report on Responses to Questionnaire). Given that part of the site has already been allocated under policy RV4 of the current Local Plan, Rural Vision 2031, for commercial/light industrial use (or alternatively housing use under Clause 10.1 of RV4) it 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 the new settlement boundary. Further, the site is within or adjacent to the bounds of the actual, physical settlement since it lies in an area which *'...is moderately located to village services and facilities and favourably located to the primary school and employment site'* according to AECOM.

I understand that Barrow School is nearly at full capacity. With the allocation of at least 170 houses it is likely that the school will need to expand to meet Barrow's increase in population. UK average is 2.4 persons per house which equates to >400 persons of which >36 will be of an age to attend Barrow School. The NP has overlooked the fact that Barrow School will need to expand irrespective of the allocated site. The NP's site is too distant for primary school children to walk and so they will need to be driven to school by parents or carers – thus resulting in additional traffic through the village and congestion/parking

problems at school pickup/drop off times at the junction of Church Road & Colethorpe Lane. It is regrettable that the NP did not give more consideration to the site adjacent to the school which would have readily enabled school expansion and the avoidance of additional traffic to transport children to/from school.

Accordingly, the NP has not given due regard to PC Questionnaire, West Suffolk Policy DM29, necessary school expansion and traffic.

35. **The SEA contains factual errors on the Bury Road site.** The site outline is not as shown in the document's map. The SEA requires correction, review and reissue.

36. **Due regard has not been given to the NP's allocated site on its impact of footpaths.**

Question 39 from the Report on Parish Questionnaire shows that 94.7% of respondents agreed or agreed strongly that rural footpaths should not be destroyed or altered in order to build new housing development. The NP site allocation would materially alter/reduce the landscape and amenity value of the public footpath and right of way shown below. This is a significant element of harm that, whilst referenced as an issue, does not appear to have been considered in the assessment of the environmental impact of the sites. Notably, the sites at Bury Road & Denham Lane would have no impact on footpaths.

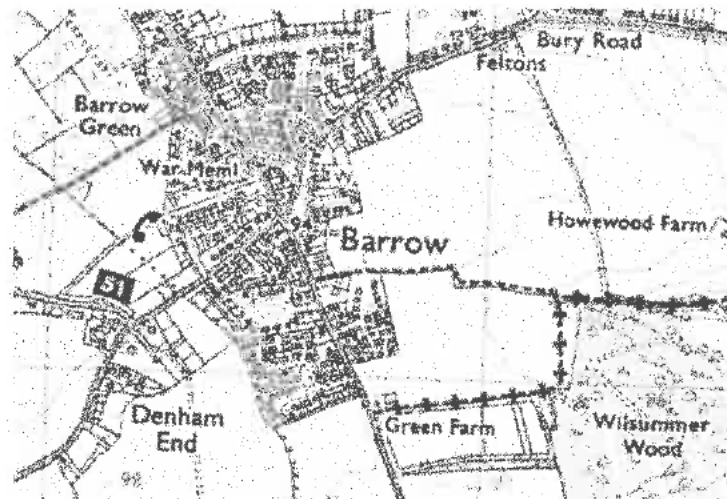


Figure 11 – part of ordnance survey map showing area of NP allocated site and impacted footpaths.

37. **The NP does not reflect or respect the desires or aspirations of the local community,** partly due to a lack of sufficient/detailed consultation and partly because the views residents expressed in the 2020 questionnaire are not appropriately reflected in the NP or its policies. Moreover, since its completion in 2020, more than 150 houses have been built in Barrow – mostly in the vicinity of the NP site. Their views have not been considered and there is a strong case for repeating a suitably revised questionnaire.
38. **Leader of the NP Sub-Committee has made misleading statements.** Minutes of the NP Sub-Committee of 25 August 2022, para 6152 states '*Cllr. R. Rawlings expressed how important it is for the community to support the plan and stated that if the plan is rejected it will not stop development and could result in additional development*'. This would reasonably be viewed as an alarming statement, prompting parishioners to vote for the neighbourhood plan or suffer the consequences of excessive development. At that time West Suffolk Local Plan (Regulation 18) Preferred Options 2022 had been published showing its preferred housing sites for Barrow at Bury Road & Denham Lane. From this information it would be clear that Barrow would likely be subject to only modest development under the emerging LP. The reality is the opposite of Cllr. Rawlings's statement because the site allocated by the NP might well be developed in addition to the sites in LP, rather than instead of.
39. **The NP Regulation 14 Consultation either limited or restricted public responses and the availability of supporting documentation.** The consultation web-site portal allowed only text to be submitted. Similarly, the hard copy flyer had sufficient space for only a few lines of text. Submission of images or more substantial text had to be done by email or post. The consultation did not state that email responses were permissible, nor did it provide an email address to which one might send an email. This was raised as an error (and agreed to be an error by the Head of the NP Steering Committee) at the October 2023 PC Meeting but the PC took no corrective action. The October 2023 PC Meeting Minutes were not published before the end of the consultation period and so the public was unaware of the email address. A post on the popular Barrow Village's social media page by the PC about email responses

would have gone along way to remedy the error - but this was not taken. The consultation web-site referenced only one supporting document (AECOM SEA) and did not reference the various other supporting documents. Th The PC did not use best efforts to promote the consultation and its actions to encourage responses falls well short of the PC positively engaging with the community about the NP.

**40. NP Policies are not evidence based, irrational, poorly considered, weak, ineffective or poorly drafted.**

**Policy BCD1.2** – a NP policy regarding the conversion of existing agricultural buildings is not appropriate since it is applicable to a very small number of instances, is not relevant to the main aspect of the NP and would be covered by local planning regulations.

**Policy BCD2** - AECOM has recommended a housing mix of 23% 2-beds, 40% 3-beds and only 12% 4-bed plus. Provision iii misses the opportunity to secure a housing mix that would meet the evidenced needs of the community. “Contributions” provisions ix and x are unduly vague and do not make clear what the contributions would be or how they would be sought. I am concerned that no provision is made for improved/expanded facilities to adopt sustainable locations in Barrow. There is no analysis of existing capacity or investigation of the potential for extensions/improvements of existing facilities. This could lead to facilities being moved out of the village or even outside of the NP area as a whole, to considerable detriment of the existing community.

**Policy BCD3** - It is of great concern that the provisions of this policy do not apply to the site allocation in policy BCD2. There is no clear reason why the site allocation deserves to be treated as an exception to these minimum/basic design and amenity standards - e.g. provision iii on avoiding significant adverse impact on existing residential amenities or provision vi on retaining healthy trees and hedgerows wherever possible etc. If anything, the allocated site’s large scale, open countryside location and proximity to woodlands increases the need for high-quality design and compliance with policy BCD3.

**Policy BCD4** - In the context of this particular NP area, the principle of locating housing for the most vulnerable and least mobile in outer-boundary locations is of deep concern

given that the rural parts of the area are poorly connected to services by public transport or walking links and, where walking links do exist, distance is likely to disadvantage their use by the most vulnerable and least mobile. The policy is ineffective and defunct as there are no known outer-boundary locations capable of meeting provision vi on access to local services and sustainable transport. The result is that the housing needs of elderly people and vulnerable groups will not be able to be met in accordance with the NP over the Plan period. A concerning lack of thoughtful consideration to meeting the needs of such residents throughout the plan (inc. ill-thought out care home proposal in BCD2).

**Policy BCD5** – It is unclear why this policy would only apply to houses and not all new buildings, especially given that the NP makes provision for new employment sites. All new development should be expected to achieve high quality and locally relevant design, not just new housing. 3-storey plus homes stated to be subject to an assessment of impact on neighbouring amenities. It is unclear why this requirement would only apply to houses of a certain size and not all houses/all buildings. This provision could be taken to imply that amenity impact would be the main consideration for taller and high-rise buildings when their impact on local character and appearance is clearly just as important. Wording is unclear and ineffective in that it requires “no impact” on amenities. That would mean even a positive impact would be in conflict with the policy. “No adverse impact” would be more effective.

**Policy BCD6** - This policy could do a lot more to promote and encourage sustainable design and construction, including the identification of specific, desired measures/features e.g. green/ blue roofs, solar panels etc.

**Policy BCD7** - Provision iv “will be encouraged...” is weak and ineffective wording. If it is the intention that allocation BCD2 should include office space for new business start-ups and opportunities for remote working, this must be added to the development criteria listed in policy BCD2.

**Policy BCD7** – Provision vi is not evidence based, has not been agreed by the PC and indicates bias by Turley. BCD 7vi reads *‘Where land is allocated for employment use, but*

*does not come forward during the plan period as envisaged, other potential uses may be supported, subject to suitable evidence of the site having been appropriately marketed for its intended use. Under such circumstances, there will be a presumption against development for open market residential use, unless all other suitable development options have been fully considered, on a cascade basis, justified by appropriate evidence.* In other words, the NP contains an important loop-hole for eventual residential use of the complete 13.6Ha site which would equate to around 408 houses (at 30dpH).

The NP makes repeated reference to employment site allocations in Rural Vision 2031 not coming forward. These allocations were introduced in 2015 and the lack of take-up indicates a lack of local need or appetite for employment premises which means that the loophole has a high probability of being used.

The inclusion of BCD7vi is contrary to the evidence in the PC's Report on Responses to Questionnaire where 71.2% of respondents to Question 31 stated that they would like to see minimal development in Barrow-cum-Denham in the next 10 years. Similarly, in Question 27, 83.1% of respondents strongly disagreed or disagreed that Barrow-cum-Denham needs more housing. This situation contrasts with other site options and WSC's emerging LP where significantly less land is allocated and the maximum number of houses is limited by the smaller size of the Bury Road and Denham Lane sites.

Further, the NP has not taken due regard from the Parish Questionnaire and ignored advice from WSC on the development of employment areas. Notably PC Minutes dated 3 October 2022 includes the following statement from a meeting with WSC on 30 September 2022: *'there was scope for shrinking the land in the Barrow Hill option to eliminate the employment areas as there had been no demand for these'*.

**Policy BCD8** – The supporting text indicates a concerning lack of consideration has been given to this subject. There is no discussion or analysis of local survey results, no study or audit of existing facilities/their capacity to sustain planning housing growth etc. Wording of the policy must be amended to make clear that the list of key services and facilities is not a closed list as there may be other important facilities that have been missed in the survey (if,

in fact, there was a survey) that deserve protection. Similarly, community facilities that may come forward over the plan period could be deserving of this protection. The 'focus on Barrow' - not just in this policy but throughout the Plan - is concerning and it is unfortunate that the Plan does not do more for the hamlets and rural locations in its area. For example, there is a butchery/farm shop in Denham. It is inappropriate that the takeaway restaurant would be considered a community facility - this could clearly lead to hot food takeaways being put forward by developers as community facilities and being "supported in principle" which would obfuscate the community harm that is often associated with such uses (inc. in terms of health/wellbeing/amenities/pollution etc.). It is unfortunate that the policy focuses unduly on business premises and fails to identify or offer protection to natural or less formal community facilities such as footpaths and green spaces (e.g. Barrow Green). As regards footpaths - these are valuable green spaces and community facilities. When developers conduct landscape assessments, they are invariably required to consider the impact (visual and otherwise) on public footpaths, including their amenity/recreation value (for example, as tranquil green corridors offering escape from the built environment and access to countryside). The NP site allocation would materially alter/reduce the landscape and amenity value of the below public footpath. This is a significant element of harm that doesn't appear to have been considered during the site assessment process.

**Policy BCD9** – The same comments apply here as made previously regarding the lack of sustainable transport modes in outer-boundary locations. Provision ii - This ought to apply to all new development and all new sport/recreation facilities not just "all-weather playing surfaces". External lighting, especially in the rural areas, ought also to avoid unacceptable impacts on landscape character and local wildlife, including nocturnal species such as bats.

**Policy BCD10** Provision iii – This is unclear and nebulous. Which habitats? What type of contribution? And how and by whom will the contribution be calculated, collected and then put in place? Why only housing developments? And why is the threshold set at 5 units? The lack of thought and justification here is concerning.

**Policy BCD11** - Given that Barrow contains relatively few statutorily listed buildings but does actually contain many older and good quality buildings, it is truly unfortunate that the NP has not taken the opportunity to investigate or identify buildings for local listing or local protection. There is insufficient acknowledgement of non-designated heritage assets (NDHA) or protection for them. They are only mentioned in passing at the end of the policy - "Proposals for new development which indirectly affect, but are proximate to, listed buildings or other heritage assets...". The strange result is that the policy protects against development that would indirectly affect a NDHA but not development that would directly affect a NDHA. This policy will not meet the basic conditions as it conflicts with national and local heritage policy. In particular, provision ii conflicts with the need to conduct a balancing exercise in the event of harm to heritage assets (paras 201 and 202 National Planning Policy Framework).

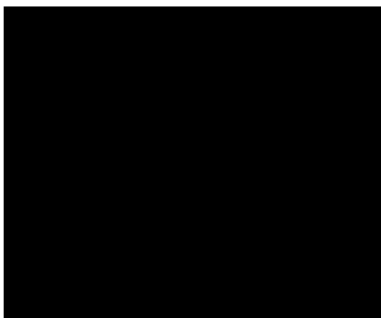
**Policy BCD12** Provision ii - I have serious concerns with this approach as it risks the creation of car/ parking-dominated built environments of inappropriately urban character. The main reason developers attempt not to provide "in curtilage" parking is in order to cram as many homes into a given site as possible to maximise profit margins. NPs should not directly encourage such practice. Following from the above, the NP should be in conformity with current local parking practice in Suffolk Guidance for Parking (2019). This document encourages on plot parking where housing densities are lower and given that Barrow is a village with a rural character and not a town or city, its housing densities should be lower - *'Para 4.1. On Plot Parking Where housing densities are lower, space for car parking can be provided 'on plot', within the curtilage of the dwelling, such as in the form of a garage, car port, parking bay or private drive. Parking or garaging within the private curtilage of the dwelling has the advantage of being accessible, secure and easy to supervise. Given accessibility requirements preference should be for access from the front of the dwelling/premises'*.

Provision ii should be made clearer but, as worded, seems to encourage development proposals to seek to provide less parking than is encouraged by Local Plan standards. This is a totally unacceptable approach in Barrow given its rural character and limited sustainability. See the following extracts from Suffolk Guidance for Parking (2019) -

*'Foreword - In recent years, the planning policy of restricting the level of parking provision, particularly in new residential developments, has tried to promote less reliance on the motor vehicle and a move to more sustainable and healthy methods of travel, particularly for shorter journeys. This approach has had some success in city centres across England where public transport provision is good, the distance to important community services is short and plenty of local shopping is available. However, in inter-urban and rural communities where mobility is more reliant on access to a car, many residential developments have suffered from limited parking allocation. The change in government has placed a new emphasis on local decisions and a move in policy attitude towards adequate parking provision.*

Provision iv - this is totally unclear. There is no way for developers or decision-makers to know what is actually being sought here or how accordance might be demonstrated with this policy.

Thank you in anticipation of your consideration of the above.

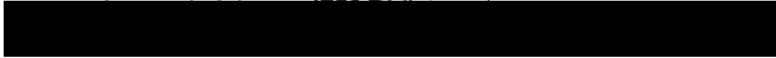




**Barrow cum Denham Parish Council Neighbourhood Plan Regulation 14 Consultation**

1 message

23 October 2023 at 22:45



Dear Mrs Chilton

Please accept this as my response to the Neighbourhood Plan regulation 14 Consultation.

Regards



**Barrow Cum Denham Parish Council Neighbourhood Plan Reg 14 1 2.pdf**

635K



E –Sustainability

F- Green energy

G-Sports facilities

H - Visual impact of sites

I -Protection of ancient woodlands

J-Inadequate and out-dated surface water drainage

K-Aecom historic & environment assessment

L - Over allocation of land

M-Village Doctors surgery

N- Barrow VC Primary School

## **A-THE PROCESS IS NOT EVIDENCE LED**

I believe the process has not listened to the wishes of the parishioners

**1-The Parish Council published their Report on 'Responses to Questionnaire' in February 2021.**

The questionnaire covered a wide range of questions including Demographics, Amenities, Future Development, The environment, and Infrastructure. 375 responses were received.

At the time of the questionnaire the new development around Beale Road of 75 properties and positioned in 'Sector 2 'of the village, had not been completed, no properties were occupied and therefore had no input into the initial consultation. This may have changed dramatically the results of the initial questionnaire across all aspects of the results. The properties around this area are greatly affected by the current NP proposal and have been least consulted.

**2. It seems to me that voices of the parishioners have not been considered or investigated in full, if at all and that their views have not 'informed the draft neighbourhood plan'.**

In the Village Questionnaire, in which results were published 3 February 2021, an overwhelming majority of the village said that if the village had to take more housing that it should be in Sector 4 of the Village Questionnaire. With the reasons being that this would lead to the least increase in traffic through the village. The majority of people travelling to work would inevitably travel directly down Colethorpe Lane to the A14. Those needing to take their children to the primary school could walk safely and quickly. Those wanting to use public transport were in easy walking distance of bus stops and some of the current bus routes come directly past this area, so an additional bus stop was a possibility. Those wanting to use the train to Cambridge and on, to London for example, had easy driving access to Kennet and for those wanting to go east would drive along the A14 to Bury St Edmunds without coming through the village at all. There are good pathway links to the main services in the village.

Despite questions from the public at various PC meetings about why the PC were deferring the site when it already had allocation for light industrial that could be flipped to housing the Parish Council always answered that it could not be allocated, indeed at one point saying it was illegal to challenge West Suffolk. At no point have the Parish Council asked West Suffolk Council about the possibility of utilising this land within the Neighbourhood Plan when it is by far the most popular area with the parishioners. This seems to be counter intuitive when the NP is supposed to be resident, and evidence based. It is evidence to me that the PC are more than happy to challenge West Suffolk Council over the Local Plan site choice when it doesn't align with the PC's personal votes, but they will not challenge West Suffolk on the parishes vote as evidenced from their own questionnaire. This appears to be a biased and a lazy approach by the PC, indeed detrimental to the landowners of a very sustainable site, the school and the parish as a whole. The advantage of much need additional land for the Primary School offered by the landowners has been ignored. The school are already full, and I am not aware of any meetings, nor have I seen evidence of the PC having had discussions with the school as to how the additional housing will affect the schools' requirements.

**3-Policy DM29 as mentioned in Aecoms own Site assessment shows that the Parish Council could indeed have considered the site North of the school within the Rural Housing Exception Sites process. Details of which I have listed below.**

**Aecoms Site Assessment and options report 2021 states**

*Policy DM29: Rural Housing Exception Sites in St Edmundsbury permits rural affordable housing schemes in St Edmundsbury Borough adjoining but outside a Housing Settlement Boundary or built-up area, as an exception to the provision made in the Core Strategy for general housing demand, provided that:*

*a. the development will meet or assist in meeting a proven and specific need for affordable housing in the locality which could not otherwise be met; b. the development is on the edge of a Key Service Centre, Local Service Centre, or Infill Village and is well related to existing community services and facilities and sympathetic to the form and character of the settlement; c. the site is the most suitable to meet the identified need and, in particular, the need could not be met on any site which would better meet criterion b.; 14 d. the development will not negatively impact on biodiversity, geodiversity or the surround*

**Thus, indicating that the site in the north of the village could have been considered and incorporated into the Neighbourhood Plan. When you also add in the paragraph below from Aecoms report, the influence of the community to 'shape and direct' the developments in Barrow**

'by influencing local planning decisions has been seriously curtailed by the lack of will power of the PC.

2.10 Paragraph 29 further states that neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies

**In West Suffolks Local Plan call for sites Regulation 18 Preferred options responses, West Suffolk have supported Strutt and Parkers response to the addition of the land North of the school for future Plans, as detailed below.**

[https://westsuffolk.inconsult.uk/WSLP\\_PREFERRED\\_OPTIONS/viewRepresentation?repID=12058421&nextURL=%2FWSLP\\_PREFERRED\\_OPTIONS%2FlistRepresentations%3FagentUID%3D%26objectorUID%3D41216417%26byUID%3D41216417%26byCommonName%3D%26docid%3D12338676%26repID%3D%26partid%3D%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D-%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1](https://westsuffolk.inconsult.uk/WSLP_PREFERRED_OPTIONS/viewRepresentation?repID=12058421&nextURL=%2FWSLP_PREFERRED_OPTIONS%2FlistRepresentations%3FagentUID%3D%26objectorUID%3D41216417%26byUID%3D41216417%26byCommonName%3D%26docid%3D12338676%26repID%3D%26partid%3D%26repIDstyle%3Dstarts%26repStatus%3DM%26repType%3D%26lastModifiedDateStr%3D%26searchterm%3D%26searchchildren%3DY%26hasAgent%3D-%26hasAttachments%3D%26useElastic%3D%26pageAction%3D%26%26sort%3DsubmitDate%26dir%3Ddesc%26startRow%3D1)

This would indicate that had the PC approached West Suffolk with the evidence from the Parish Questionnaire West Suffolk may have been more open to including the land North of the School as part of the NP.

#### **4-THE PARISH COUNCIL HAVE NOT FOLLOWED THE EVIDENCE SUPPLIED BY AECOM'S SITE OPTIONS AND ASSESSMENT REPORT 2021**

1.7 The purpose of AECOM's site appraisal is to assess the identified sites to understand which, if any, are appropriate for allocation in the Neighbourhood Plan. In particular, the assessment looks at whether site locations and development proposals comply with the strategic policies of the adopted Development Plan; and from the group of identified sites, then identifies which are the 7 best sites to meet the objectives and criteria of the Neighbourhood Plan. The report is also intended to help the group to ensure that the Basic Conditions considered by the Independent Examiner are met, as well as any potential legal challenges by developers and other interested

#### **'TABLE 3- Site Assessment Summary Table' Aecom write- about site BD5 Land between Colethorpe Lane & Church Road**

Development of the southern part of the site for residential homes would be contrary to the General Employment Area designation set in Policy RV4 Barrow-cum-Denham Neighbourhood Plan AECOM

6/20

PC55

34 Site Ref. Site Address Site Source Indicative Site Size (ha) Site Type Proposed Uses Neighbourhood Plan Site Assessment Summary Traffic Light Rating Rural Employment Areas in the Rural Vision 2031 planning framework. Development of the site for housing would also be contrary to Policy RV3: Housing Settlement Boundaries, Policy DM5: Development in the Countryside and Policy DM27: Housing in the Countryside. There is however potential to develop the northern part of the site for rural affordable housing schemes in line with Policy DM29:ey Service Centre where the site is well related to existing community services and facilities (primary school and designated employment area) and is required to meet affordable housing in the locality that cannot Rural Housing Exception Sites in St Edmundsbury on sites adjoining or outside the settlement boundary and on the edge of a K be otherwise met. Development of the site however 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. On this basis the northern part of the site is potentially suitable as a rural exception site with a small amount of cross-subsidising market homes subject to affordable housing need not being met in the area and discussion with West Suffolk Council on precedents set by designation of Policy RV4 on form and character of the built-up area of the village.

I believe this shows that the PC could have had conversations or email correspondence with West Suffolk Council about the allocation of BD5 into the Neighbourhood Plan. It was not 'illegal' to consider this submission as stated by the PC Chair and indeed with the supporting evidence of the village questionnaire answers it would have been more than reasonable that West Suffolk Council may have considered allowing it to go further in the process of a Parish led NP process.

The village would then have some of the development in its preferred sector, the school would have got much needed land for expansion, the village would have far less traffic going through its centre. All of which is easily evidence led.

The PC minutes from the Extraordinary Meeting held just for voting between the Bury Road Site and the three sites on Barrow Hill show beyond doubt that the PC have voted against Aecom's own evidence in its SEA.

Site evaluation scores on 5 sites taken from the Parish Council's own report, which commissioned from Aecom cos, was minuted in their Parish Council meeting dated 25/8/22.

The Aecom site assessment scoring shows that site B (Bury Road) has the highest score and so is the most suitable at 28.5.

Following an exchange of Councillors views, which have been minuted in the same meeting, 25/8/22 and also in the 'Extraordinary Meeting', held for the purpose of site voting, dated 18/10/22, the Parish Council voted for site C (East & West Barrow Hill & South of Barrow Forge) which scored much lower and is in 3<sup>rd</sup> place. So, it seems the voting was not evidence-based but based on their own personal preferences and opinions.

Just 4 members of the Parish Council made the decision to select land at Barrow Hill, a decision which affects all residents of Barrow cum Denham, it is not an evidence-based vote (nor does it reflect the preferences of parishioners, a separate point expressed below). One member of the Parish Council voted for Bury Road. Colethorpe Lane which is the residents' preference was excluded completely.

Sites selected by Parish Council at the time of voting (table shows Aecom's site assessment scoring for these sites)		Scores	Position	
A	West of Barrow Hill	BD 12	22.5	4
E	South of Bury Road	BD 13	28.5	1
C	East & West Barrow Hill & South of Barrow Forge	BD 6, 8, 12	23	3
D	East & West Barrow Hill & South of Barrow Forge & South of Denham Lane	BD 6, 8, 12, 9	20	5
F	South of Bury Road & South of Denham Lane	BD 9 & 13	26	2

***5-1 believe the PC and Neighbourhood Planning Group have not engaged with the community since the initial questionnaire in February 2021 and prior to their vote on any of their site selection process. This goes against Aecom's own advice as set out below. The Parish council ignored the only evidence they had accumulated from the questionnaire and went with their own non-evidence-based choice. This goes against Aecom's Site Options and Assessment advice as set out below.***

Next Steps 6.9 From the shortlist of potentially suitable sites, the Neighbourhood Planning Group, in conjunction with the Parish Council, should engage with West Suffolk District Council and the community to select sites for allocation in the Neighbourhood Plan which best meet community needs and plan objectives. 6.10 The site selection process should be based on the following: • The findings of this site assessment; • Discussions with the planning authority on housing requirement and direction of growth of the village; • The extent to which the sites support the vision and objectives for the NP; • The potential for the sites to meet the identified infrastructure needs of the community; • Engagement with key stakeholders; and • Neighbourhood Plan conformity with strategic Local Plan policy.

**The converse has been displayed by Bloor in their consultations with the village as a whole and with neighbours of the site involved. Bloor have made alterations to their initial plans after consultations and appear to have made strong commitments to ameliorating issues raised by concerned residents. There has no such interaction by the PC with the parish and in particular with the 35 homes that boarder directly onto the three sites allocated in the NP.**

### **B-PROCEDURAL ERRORS IN FINAL SITE SELECTION.**

**I BELIEVE DECISIONS ON SITE SELECTION ARE BASED ON PERSONAL CHOICE RATHER THAN EVIDENCE.**

**The selection of the three Barrow Hill sites was carried by a vote of 4 to 1 at the PC Meeting on 1 October 2022. This vote was taken prior to site selection policies being written by the PC and against the advice they had from their planning advisors at the time, as referenced above. It is**

considered good planning practice to write policies prior to site selection as this avoids policies being written to suit the site selected. Unfortunately, good planning practice was not followed by the PC.

Cllr Ford was one of the 4 councillors who voted in favour of the three Barrow Hill sites. At the subsequent 2023 PC Annual Meeting a member of the public asked the PC about exactly what evidence the PC had used for their site selection of the three Barrow Hill sites over Bury Road. Cllr Pearson [Chair] started to answer that the Bury Road site had up to 6 species of bats in the area, the site entrance was opposite a listed building, and potential coalescence between Barrow and Burthorpe, Cllr. Ford interjected at this point, replying that his vote for Barrow Hill site was based on personal choice.

It is the context of Cllr Fords comment that causes great concern about the legitimacy of his vote. Cllr Ford interrupted Cllr Pearson's evidence against the Bury Road site indicating that his personal choice was a good enough reason on its own and evidence-based reasoning was not required.

Unfortunately, Cllr Ford was not in attendance at the Parish Council meeting 5 June 2023, but a parishioner did raise the issue. Cllr. Ford's response was later clarified in the Parish Council Meeting of 17 July 2023, and he agreed that his vote had been a personal choice and he had voted as any member of the public could. Unfortunately, and rather strangely the question nor answer were recorded in the minutes and so the issue was raised again at the 2 October 2023 PC meeting where once again Cllr Ford confirmed his vote was based on personal choice.

Neighbourhood Plan decisions and particularly votes should be evidence based rather than personal choice, this is a regulation of the NP process. The use of personal choice as a basis for decision risks the possibility of decisions being influenced by a myriad of other factors including friendships with landowners for example.

## **C-PROCEDURAL ERROR IN SELECTION OF CONSULTANTS**

**I BELIEVE THE PARISH COUNCILS' CHOICE OF INDEPENDENT CONSULTANTS IS BIASED TOWARDS THE CHOSEN LANDOWNERS AT BARROW HILL AND TO Cllr Steer THIS IS THEREFORE CONFLICTED. [REDACTED]**

The PC originally used Planning Direct planning consultants for the NP. The relationship ended when Planning Direct pointed out problems with the PC's site selection process and, in particular, issues relating to the PC's selection of the Barrow Hill site. Turley's Cambridge Office was then selected by the PC to provide similar professional services. Public records suggest that Turley have carried out 30+ projects for Pigeon Investment Management whose

09/20

PC55

founding director, William Stanton, is a landowner of one of the three sites allocated at Barrow Hill.

The projects include the submission of land at Barrow Hill to WSC's SHELAA in December 2020 on behalf of the Jane Steer (PC Vice-Chair), Nigel Steer, William & Sophie Stanton. 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 the landowners 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. This indicates a biased approach by the PC towards one set of landlords.

The selection of independent consultants should not just have no conflict of interest they should be perceived as having no conflict of interest. It is fundamental for the Parish Council and the process so be seen to be as open and fair. This issue has been raised so many times at PC meetings both by the public, in the public forum and through correspondence, and also including queries from two Councillors, Cllr Kronsberg and most recently Cllr France in October 2023 PC meeting. That this perception of no conflict of interest has not been quelled or rectified is a major concern

It is also noted that Turley's quote was the most expensive and did not include the Regulation 14 consultation which the Planning Direct quote did. Taken from the PC minutes of 11/04/23.

*b) To discuss/accept quotes from planning consultants. As previously reported, two quotes had been received. Turley had quoted [£13,850 – check amount]; Planning Direct had quoted £13,500.. Cllr Rawlings recommended Turley. On a question from Cllr Kronbergs, he agreed that Turley's quote had not included costs for the Regulation 14 consultation, whereas Planning Direct had included this element.*

It is of concern that there has been no discussion at PC meetings of further quotes from Turley to complete the Regulation 14 Consultation, despite the NP regulation 14 consultation stating that it will be Turley completing that process. This indicates a PC using by the far the largest quote in favour of a company who has represented two of the sites within the NP. This could be seen as a misuse of the public purse .

The PC have said that they were struggling to find consultants able or willing to do the work. This seems extraordinary to me, especially when villages including Worlington and others in the area have been using <https://uk.linkedin.com/in/ian-poole-43687638> Ian Poole in this role to support their NP. He worked within the St Edmundsbury as a policy advisor for 9 years and so knows the area very well. I am not convinced about the procurement process at all.

This conflict of interest undermines the fundamental principles of democracy and effective governance by casting doubt on whether the Councilor's decisions are motivated by the welfare of the community or their personal interests. It diminishes the confidence of the public in the decision-making process and tarnishes the perception of impartiality and equality that should be the foundation of such local planning efforts

## D-PREFERENTIAL TREATMENT TO ONE LANDOWNER AND PROCEDURAL ERRORS

**I BELIEVE PROCEDURAL PROPRIETY WAS NOT OBSERVED IN THE NP PROCESS BECAUSE THE PC GAVE PREFERENTIAL TREATMENT TO ONE LANDOWNER, CLLR JANE STEER (THE PC VICE-CHAIR).**

Councillor Steer and her partner, Nigel Steer, own land east of Barrow Hill. This site was submitted as part of the NP Call for Sites in 2020. Mrs Jane Steer was co-opted on to the PC on 6 October 2021 after submitting her CV. Mrs Steer was a well-known member of the Barrow community as her husband has the business selling home grown beef from prize winning Red Poll cattle from land included in the call for sites.

The following meeting on 14 October 2021 was an Extraordinary Meeting with only two agenda items.

4- New Councillors Acceptance of office

And

5. Neighbourhood Plan

a) To consider the Council's response to the Site Options and Assessment Draft Report from AECOM

b) To consider delegation of powers concerning the Neighbourhood Plan to the Neighbourhood Plan Subcommittee

c) To appoint two new members of the Neighbourhood Plan Sub-Committee

**Followed by the minutes of the same meeting**

5932 New Councillors acceptance of office Cllr Rawlings and Cllr Steer signed their acceptance of office forms in front of the councillors present at the meeting. The form was then signed by Cllr Pearson.

5933 Neighbourhood Plan

a) To consider the Council's response to the Site Options and Assessment Draft Report from AECOM ..... It was agreed by the PC that they would support BD13 [Bury Road]

1. b) To consider delegation of powers concerning the Neighbourhood Plan to the Neighbourhood Plan Sub-Committee To reduce the number of extraordinary meetings required, Cllr Kronbergs suggested delegating decision-making powers to the sub-committee. The timetable for the next consultation (hopefully February) will require rapid decision making. The clerk confirmed that the sub-committee is bound by the same rules as a full parish council meeting and that the agenda must be published ahead of the meeting. Cllr Kronbergs proposed the motion to give delegated powers to the NHP Sub-committee. This was seconded by Cllr Rawlings. The councillors voted on this motion. All agreed. Clerk to update the terms of reference. c) To appoint two new members of the Neighbourhood Plan Subcommittee Cllr Steer agreed to join the NHP committee. Another member is required, clerk to make it an agenda item for November meeting and subsequently joined the NP Steering Committee.

**It is extraordinary that Cllr Steer did not declare an interest in The Neighbourhood Plan , as a landowner at this meeting but even more surprising that the Parish Council voted for her as a Parish Councillor knowing that she was a landowner who had submitted land into the NP call for sites and also into the Local Plan, when there had been a CV from Rosemary Varley who**

11/20

PC55

had no conflict of interest, an impressive track record and offered specifically time to invest in the Neighbourhood Plan.

Beyond the extraordinary is that Cllr Steer then volunteered to be on the NP Steering committee and was accepted.

At the Parish Council meeting on 2 November 2021 a parishioner asked about the voting system for new councillors and the and the minutes state

*5937 PUBLIC FORUM There were three members of the public present. ....*

*A second member of the public asked the Parish Council what the most pressing issue is currently. Cllr Kronbergs responded by confirming moving forward with the NHP was the most pressing issue to ensure it is ready for submission. The member of the public raised concerns over the selection process of the new parish councillors and questioned why they were not asked if they had the time to commit to the NHP before being co-opted. Cllr Kronbergs confirmed that candidates were selected following the normal procedure. They were asked for a CV and covering letter. Candidates were also invited to make a statement to the Parish Council. Councillors voted on the strength of the CV and covering letter. Out of the two new councillors one volunteered to join the NHP committee.*

Records also show at that meeting that 5948 NHP Sub-Committee Members Cllr Steer has joined the NHP Sub Committee. Cllr Kronbergs to forward all relevant documentation to her. In fact, a member of the public saw the NP file given to her at the meeting.

Procedural propriety was not observed in the NP process because the PC gave preferential treatment to one landowner (Cllr Steer, the now PC Vice-Chair) above others. The minutes make no mention of the PC providing the same documentation to other landowners. The documentation would have provided Cllr. Steer with an unfair advantage over other landowners and developers.

Moreover, if Councillor Steer subsequently received further emails or information concerning the NP that other landowners did not receive at the same time, this would have given her a further, unfair advantage. Notably and possibly most importantly at the time of her joining the PC, Cllr. Steer's site had been rejected but was subsequently selected following her time on the NP Steering Committee. When you read the minutes from Cllr Steers first meeting 14/10/21 the Bury Road site had just been supported by the PC.

Procedural propriety was not observed in the NP process because the PC Vice-Chair (with a pecuniary interest) took part in relevant aspects of PC Meetings. Given Cllr. Steer's pecuniary interest, it is notable that she volunteered for, was accepted on to and served on 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 Meeting she seconded the 3 October PC minutes (in which she had declared a pecuniary interest in the NP). Notably, the 3 October 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 and did not re-apply to be a councillor in the newly formed Council. Further, PC Minutes of 5<sup>th</sup> June 2023 taken by Cllr. Steer omit to include an important NP report as an appendix.

12/20

PC55

All of the above matters seem to be contrary to the Parish Councils own 'Standing Orders' section 13 Code of Conduct and Dispensations. Once again it seems bizarre that if the PC wish to be seen as running an above board, clear and transparent NP, you might presume that they would wish there to be absolutely no chance of people being able to question the process. If they do not wish this to be the perception, then exactly what were they doing in assisting certain landowners.

On 2 October 2023 PC meeting Cllr Steer was asked exactly what her Declaration of Interest was from a member of the public as they had not been able to find it mentioned in any minutes. Cllr Steer said she was a landowner and that she had never been involved in the Neighbourhood Plan. Unfortunately, this is obviously not correct as she volunteered to go onto the Neighbourhood Plan Sub Committee the same day as she signed her acceptance of office forms as noted above and received all of the NP paperwork.

Cllr Steer has also never declared her working relationship with The Parish Councils' chosen Independent Consultant, Turley, to the Neighbourhood Plan process, despite numerous questions to the Parish Council with reference to there being a conflict of interest as evidenced below.

West Suffolk Local Plan (LP). The document is a Turley document and is available to view on WSC's website. Cllr. Steer's relationship 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 served on the NP Steering Committee and the NP's proposed site includes her land and land owned by William & Sophie Stanton. Notably, the three sites selected by the PC are classed as a single site in the NP under a consortium of the owners which include Cllr. Steer, Nigel Steer, William & Sophie Stanton Mr Phizaklea This suggests that this commercial relationship carried on during Cllr. Steer's period as a parish councillor. Accordingly, procedural propriety was not observed.

Taking into consideration all of the above I need to express my deep concerns and objections regarding the NP that is in consultation 14 phase. Whilst I recognize the importance of community development and the role of neighbourhood planning in shaping the future of our community, it is my firm belief that this particular plan is fraught with procedural errors, specifically related to a significant conflict of interest involving a councillor who is also a landowner within the area.

One of the fundamental pillars of a fair and just decision-making process in local governance is the impartiality and transparency of elected representatives. The presence of a councillor who is also a landowner in the neighbourhood plan presents a clear conflict of interest that undermines the integrity of the decision-making process. I believe Cllr Steer is inherently conflicted, as her personal financial interests may directly benefit from the outcome of this plan. As such, her involvement in the planning and decision-making process is ethically questionable, if not entirely inappropriate.

This conflict of interest compromises the very essence of democracy and good governance, as it raises doubts about whether the Councilor's actions are driven by a commitment to the best

13/20

PC55

interests of the community or by their own financial gains. It erodes public trust in the process and taints the perception of fairness and equity that should underpin such neighbourhood planning initiatives.

Furthermore, the presence of this conflicted councillor has a domino effect on the overall procedural integrity of the NP. It opens the door to further questions regarding transparency, accountability, and fairness in the planning process. The mere appearance of impropriety can damage the public's confidence in the entire process and lead to a lack of faith in the plan's legitimacy.

To ensure that the plan is developed and approved in an impartial, transparent, and fair manner, it is imperative that measures be taken to address the conflict-of-interest issue promptly. This may involve the recusal of the Cllr Steer from any further involvement in the planning process or, alternatively, the establishment of an independent review committee to assess the plan's merits and objectivity.

Our community deserves a NP that is free from such procedural errors and conflicts of interest and one that truly represents the collective interests of all residents. I trust that you will take this matter seriously and take the necessary steps to rectify the situation, thereby ensuring the integrity and credibility of the NP process.

## E –SUSTAINABILITY

**I BELIEVE THE PC HAVE NOT CHOSEN THE MOST SUSTAINABLE SITE.**

The Neighbourhood Plan has chosen three sites on Barrow Hill totalling 13.6 hectares ,3.6 hectares more than that on Bury Road.

If all of these three sites were allowed to progress and with average housing of 30 homes per hectare, this would equate to over 400 houses.

*POLICY BCD7 Where land is allocated for employment use but does not come forward during the plan period as envisaged, other potential uses may be supported, subject to suitable evidence of the site having been appropriately marketed for its intended use. Under such circumstances, there will be a presumption against development for open market residential use, unless all other suitable development options have been fully considered, on a cascade basis, justified by appropriate evidence. – within the NP allows this to happen*

When farmland availability is shrinking due to housing requirements it seems extraordinary that the PC should choose to take an extra 3.6 hectares of grade 2 farmland out of productivity and place it under concrete. This is against the parish questionnaire results request to protect the surrounding countryside.

14/20

PC55

Bearing in mind the draft NP This does not include the promised but not properly documented 5 hectares of land for the additional sports facilities. So actually 18.6 hectares, 8.6 hectares more than Bury Road, of Grade 2 Agricultural land will be taken out of food production at a time when the country is not able to provide enough food itself. The results from the village questionnaire *Question 40 - Green spaces around Barrow-cum-Denham should be protected from development* showed that 81% of respondents strongly agreed and 13.1% agreed. That is a total of 94.1% believe that we should protect our farmland against development.

## **F- GREEN ENERGY**

There is no detailed information about the green energy that will be used within the three sites on Barrow Hill. With Pigeon also having a solar power division I am worried that we could have a solar farm added to the south facing, west side of Barrow Hill with battery storage facilities at Green Farm. This would mean even more hectareage being taken out of agriculture and an eye sore at the entrance to the village.

Conversely Bloor have stated that their site on Bury Road would be using ground source heat pumps which are supplied to each house and are not a blot on the landscape or taking additional land. I therefore feel that the Bury Road site seems to be a better 'green option'

## **G-SPORTS FACILITIES**

**I BELIEVE THESE ADDITIONAL FACILITIES HAVE NOT BEEN INCLUDED IN ANY OF THE SITE ASSESSMENTS**

The Sports facilities have not been included in the site assessment evaluation. Considering the Parish Councils apparent main reason for choosing the 3 sites on Barrow Hill is the additional facilities to be offered to the village, in a 5-hectare sports field, this is remiss if not mis-leading. The additional five hectares will be used for parking, sports fields and a pavilion. There has been no consideration of the additional traffic coming to the site even if the villagers walk from one end of the village to another the opposition teams will have to drive. No assessment of this additional traffic and its disruption has been made.

It will also probably mean an additional road entrance onto Barrow but as there is no indication of where it may be sited it cannot be assessed properly.

The Bury Road site plans show open green walkways and community open spaces, a children's play area a nature area on the north east corner to protect against perceived coalescence with Burthorpe and they have offered to put monies towards the PC new hoped for sports changing rooms on the current sports field behind the village hall.

## **H - VISUAL IMPACT OF SITES.**

I believe the view of the Barrow Hill sites will be highly visible on the entry into the village from Hargrave direction. Once at the brow of the hill coming up from The Wash the site is visible across the fields for some distance. Bearing in mind the site is situated on a slope disguising the new development will be very difficult

Consideration must be given to the views and landscape impacts from Hargrave and Chevington in the south. Barrow Hill is highly visible and forms a significant feature within the surrounding landscape. The existing new housing on the Barrow Hill can be seen four miles away and has been inadequately screened with patchy tree planting.

Further housing will only increase the disruption to open views from rural Suffolk countryside

### I - PROTECTION OF ANCIENT WOODLANDS

I believe Wilsummer Wood is an ancient woodland that should be protected.

These ancient woodlands are an important reservoir of biodiversity and should be emphasised in the constraints section. Government policy (Keepers of Time: ancient and native woodland and trees policy in England, DEFRA, May 2022) recommends that we "reduce the pressures on ancient woodland, and ensure they are more resilient to the threats of climate change, pests and disease". All efforts must be made to avoid harm and the Plan should be looking for opportunities to extend and enhance the woodlands through management and natural colonisation in line with local authorities' biodiversity duty, strengthened in the Environment Act 2021. Any development to the west of the woodlands is likely to drastically change the water table and drainage to the woods and therefore potentially harmful to the condition of the habitat.

### J - INADEQUATE AND OUT-DATED SURFACE WATER DRAINAGE CAUSING LARGE AREAS OF STANDING WATER ON ROADS AND PAVEMENTS

It is my concern that the PC and the NP have not given due attention to the persistent flooding issues experienced by the communities of Barrow, Denham, and Burthorpe. Particularly, the streets of Bury Road, Denham Road in Barrow, and Barrow Hill have been consistently afflicted by extensive areas of standing water. This results in cars having to navigate through the centre of the road or cautiously traverse deep waters. Furthermore, the runoff from these areas creates significant splashing, soaking pedestrians. Unfortunately, pedestrians are often unable to use certain portions of the pavements during these times. These problems are further exacerbated by the outdated drainage systems consisting of gullies along the roadside, which were not designed to handle the growing number of residences in the area. This situation is likely to worsen due to the effects of climate change. The addition of housing at Barrow Hill is expected to compound these issues.

On a more positive note, there is a section of Bury Road where a significant surface water problem is being addressed. Bloor Homes, the proposed developers at the Bury Road site, have responded to the concerns of affected residents, particularly those prone to flooding. They are currently working on a proposal to implement new surface water drainage systems in the affected area. This

16/20

PC55

plan involves installing Beany curbs, modifying the road's camber, and clearing the ditches to enhance water dispersal. However, it's essential to note that these improvements are contingent on the Bury Road development taking place. In previous Parish Council meetings, this matter was raised, but the Parish Council declared that they lacked the responsibility and capacity to assist residents whose homes are at risk of flooding.

During the Parish Council meeting on April 28, 2022, it was asserted that future developments should incorporate "road improvements" as part of the agreement. Nevertheless, no provisions have been made in the Neighbourhood Plan to address the surface water drainage issues along Barrow Hill and The Street before any further construction takes place. It is imperative that these provisions are both explicit and legally binding.

#### **Outdated Foul Drainage Systems (Sewerage)**

Residents in the Woodland Rise development and Barrow Hill are currently grappling with issues related to the outdated foul drainage system. This system was installed many years ago and was not designed to accommodate the number of houses it currently serves. Once again, there has been a lack of provisions to modernize these systems and rectify these concerns before proceeding with additional construction, which would further strain these already overburdened systems.

### **K-AECOM HISTORIC & ENVIRONMENT ASESSEMENT**

#### **I BELIEVE AECOM'S SITE ASSESSMENT OF THE BURY ROAD SITE REGARDING HISTORIC ENVIRONMENT IS INCORRECT**

The poor ranking of the Bury Road site regarding impact to the Historic Environment is irrational. AECOM's Strategic Environmental Assessment ranks Option B (Bury Road) and Option E (Bury Road & Denham Lane) as equal 4<sup>th</sup> on impact to historic environment. This is based on the Bury Road site being '...potentially within the setting of the Grade II listed The Weeping Willow Public House and Grade II listed Barrow House & Carriageway'. I believe the word 'potentially' has been misinterpreted.

The Weeping Willow is adjacent to a truck parts industrial building with no architectural value, substantial telephone exchange with no architectural value, and a mobile phone mast. After a successful planning application, over seen by West Suffolks Listed Building department the Weeping Willow recently built a number of chalet style buildings in the pub garden to accommodate B&B guests and a related carpark positioned between the pub and the proposed Bury Road Site. External views of the Weeping Willow from public spaces would be unaffected.

*'Given that the Weeping Willow is a listed, publicly accessible building, the views from within the building also need to be considered.'*

These are unaffected by development of the Bury Road site for the same reasons as above. To suggest a more distant development beyond the car park and chalet buildings would have an impact on the Weeping Willow's setting is irrational.

### **L - OVER ALLOCATION OF LAND**

17/20

PCSS

I believe the PC have over allocated land allowing developers to build more than the 170 homes allocated to Barrow from the West Suffolk local Plan

If all of the three separate sites allocated in the NP were allowed to progress and with average housing of 30 homes per hectare, this would equate to over 400 houses being able to fit on the sites. The PC have encouraged the ability of the developers to be able to build additional houses by this over allocation of land and by including policy BCD7 within the NP policies

*POLICY BCD7 Where land is allocated for employment use but does not come forward during the plan period as envisaged, other potential uses may be supported, subject to suitable evidence of the site having been appropriately marketed for its intended use. Under such circumstances, there will be a presumption against development for open market residential use, unless all other suitable development options have been fully considered, on a cascade basis, justified by appropriate evidence. – within the NP allows this to happen.*

It seems extraordinary that PC would even consider allowing this policy to be in the NP regulation 14 consultation, when they are so against over development of the Parish. This is an indication to me that Turley consultants are absolutely biased towards their big customer and landowner, Pigeon developments, [REDACTED] and are attempting to sneak policies past the PC, who are so worried about timescales they are not reading the documents in enough detail.

There is already evidence proving that we do not have the demand for office space in the village as in the past 4 years farm buildings at Green Farm, Barrow Hill, coincidentally owned by [REDACTED] already have planning permission for conversion to offices and despite being marketed heavily by Merrifields, Bury St Edmunds during that time for offices, there has obviously been no interest as they have not been converted and have since been withdrawn from market. This shows no need for more office space in the village and so makes one wonder at the need for it to even be allocated into the NP.

### M- Lack of Consultation Between Parish Council and Local Doctors' Surgery on Neighbourhood Plan Expansion

The effective planning and development of a NP should involve a collaborative effort between local authorities, community stakeholders, and healthcare providers. A critical component of this collaboration is ensuring that medical infrastructure, particularly doctors' surgeries, can adequately serve the growing population. However, in this case a lack of consultation between the Parish Council and the local doctors' surgery regarding the proposed addition of 170 houses and an additional nursing home to the NP has raised concerns.

The PC has been working on a NP that outlines its vision for future development. This plan aims to address housing needs, community facilities, and infrastructure. A key part of any successful plan is the integration of medical services to meet the healthcare demands of an expanding population.

I believe there has been a lack of Medical Infrastructure Consultation: One of my primary concerns in the NP is the lack of consultation between the Parish Council and the local doctors' surgery regarding the expansion of housing and the addition of a nursing home. The doctors' surgery, as the primary healthcare provider in the area, should be a crucial stakeholder in any development plan that significantly impacts the local population's health and well-being.

The addition of 170 houses and a nursing home is likely to increase the local population significantly. This growth will inevitably strain the already oversubscribed existing healthcare services provided by the surgery. Without proper consultation, there is a risk of overwhelming the already overburdened healthcare system.

Other issues arise with this inadequate direct consultation with the doctor's surgery

- **Accessibility and Timely Care:** With an increased population and no clear plans for expanding or enhancing medical facilities, residents may face difficulties accessing timely medical care. Longer waiting times, reduced availability of appointments, and overcrowded services are all possible consequences of inadequate planning.
- **Implications for Elderly Residents:** The addition of a nursing home raises additional concerns. The quality of care for elderly residents in the nursing home is directly related to the availability of medical services and professional staff. Without consulting the doctors' surgery, the Parish Council may inadvertently jeopardize the quality of care for these vulnerable members of the community.
- **Public Health and Safety:** The lack of consultation with healthcare professionals is not only a matter of convenience but also a public health and safety issue. Inadequate healthcare infrastructure can lead to delayed diagnosis and treatment, which may have serious consequences for residents' health.

Collaboration between the Parish Council and the local doctors' surgery is therefore essential to ensure that the expansion of Barrow cum Denham proceeds in a manner that meets the healthcare needs of its residents. The concerns raised regarding the lack of consultation with medical professionals must be addressed to avoid potential challenges in accessing healthcare services and maintaining the overall health and well-being of the neighbourhood's growing population. It is imperative that the PC engage in open dialogue with the doctors' surgery and healthcare providers to incorporate their expertise and ensure the comprehensive development of the NP

### **N-Parish Council's Lack of Consultation with the Barrow VC Primary School**

I believe the PC have not had any direct consultation with the village primary school regarding the additional 170 Houses in the Neighbourhood Plan and the site selection process.

The Neighbourhood Planning process in the United Kingdom is intended to be a collaborative effort involving all relevant stakeholders, ensuring that the community's needs and concerns are considered in the development of a NP and within the Local Plan. In this assessment, I believe the PC has failed to directly consult with the village primary school regarding the proposed addition of 170 houses in the Neighbourhood Plan. This omission raises concerns about transparency, community involvement, and the potential impact on the school and its students.

- **Lack of Transparency:**

The lack of direct consultation with the village primary school raises concerns about the transparency of the Parish Council's decision-making process. Transparency is a fundamental aspect of the Neighbourhood Planning process, as it allows residents and stakeholders to understand how decisions are made and the reasons behind them. By not involving the school in

19/20

PCSS

the consultation, the Parish Council may be perceived as making decisions behind closed doors, which erodes trust within the community.

- **Community Involvement:**

Neighbourhood Planning aims to promote community involvement and engagement in local decision-making. A primary school is a central institution in any community, and its needs and concerns should be heard and considered. The omission of consultation with the school contradicts the spirit of the Neighbourhood Planning process, as the school is a significant stakeholder representing the interests of students and their families.

- **Impact on the School:**

The addition of 170 houses to the neighbourhood could have a substantial impact on the village primary school. It may lead to increased demand for school places, putting pressure on resources, such as classrooms, staff, and infrastructure. The school's capacity to accommodate additional students and maintain educational standards should be considered in the Neighbourhood Plan. The omission of the school's input in the planning process could result in unforeseen issues that could have been addressed through consultation.

- **Legal and Ethical Obligations:**

Parish Councils have a legal and ethical obligation to involve key stakeholders in the Neighbourhood Planning process. While there may be a need for confidentiality in some cases, the omission of a primary school from consultation, particularly on an issue with direct implications for its operations, may breach these obligations.

#### **Recommendations:**

To address the situation, the Parish Council should consider the following actions:

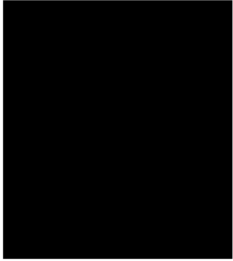
- **Direct Consultation:** Initiate a direct consultation with the village primary school to gather their input on the proposed addition of 170 houses and the potential impacts on the school.
- **Transparency:** Enhance transparency in the Neighbourhood Planning process by keeping the community informed about decisions, rationale, and any changes to the plan.
- **Impact Assessment:** Undertake a thorough impact assessment to evaluate how the additional housing may affect the primary school in terms of capacity, resources, and infrastructure.
- **Community Engagement:** Encourage broader community engagement to ensure that all stakeholders, including the school, have an opportunity to voice their concerns and provide input.

The failure of the Parish Council to directly consult with the village primary school regarding the addition of 170 houses in the Neighbourhood Plan raises concerns about transparency, community involvement, and the potential impacts on the school. It is crucial that the council rectifies this oversight and actively involves the school in the decision-making process to ensure a more comprehensive and inclusive planning process that aligns with the principles of Neighbourhood Planning.

This is particularly important as the PC have rejected a land allocation that could have allowed the school to expand from the NP site selection process as noted previously.

20/20

PCSS



**Barrow Neighbourhood Plan Consultation**

1 message

23 October 2023 at 23:06

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.

Best wishes





---

**Objection to the Parish Council's Neighbourhood Plan**

1 message

24 October 2023 at 13:29

Dear Ms Chilton,

Thank you for the opportunity to comment on the Parish Council's Neighbourhood Plan. I would like to object to the preferred site for development in the Neighbourhood Plan (Barrow Hill) on the grounds explained in the attached PDF document and the very real risk of flooding in existing and new houses built in a small village with inadequate infrastructure to deal with a large number of new houses.

I would be grateful if this email and the attached could please be submitted along with the other comments on the Neighbourhood Plan during the public consultation period which ends today. Please ensure these are all made available to the Inspector, in accordance with due process.

With thanks and kind regards,

---

 **Drainage and foul systems - NP.pdf**  
4522K

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

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

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

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

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

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

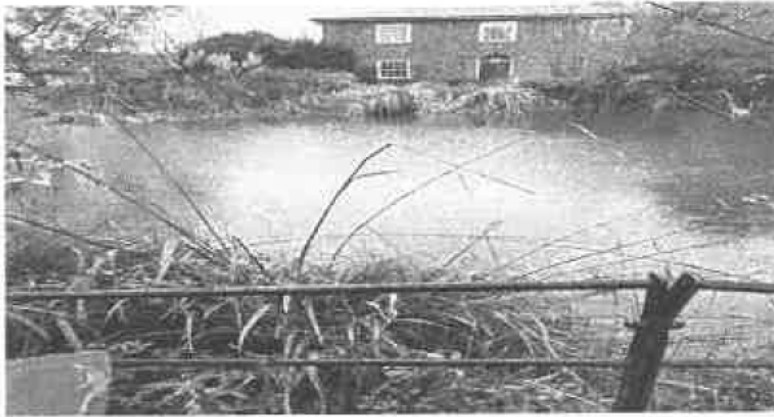
#### Barrow Hill



#### The Street



The Pond opposite the Green, almost at the point of over-flowing



## 2 Out-dated foul drainage systems (sewerage)

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




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

1 message

24 October 2023 at 15:18



Dear Sirs,

I write further to my colleague's email with detailed representations to the draft Neighbourhood Plan consultation on behalf of our client, 

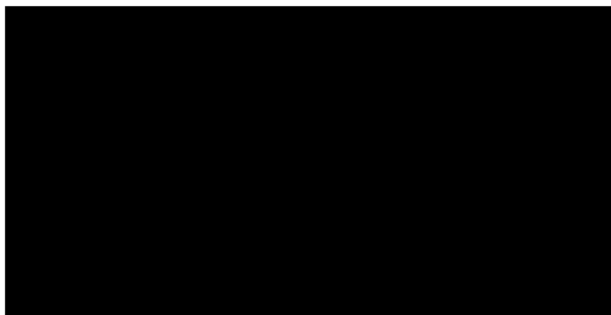
To assist with the consideration of our detailed representations, please find attached a summary letter setting out the key benefits of the our site (Land between Colethorpe Lane and Church Road, Barrow) for consideration in the Neighbourhood Plan.

I would be grateful if you could acknowledge receipt of this email and its attachments including my email of 9 October 2023 (see attached for ease of reference)?

We would also welcome the opportunity to discuss the site and the benefits it can deliver with you in advance of the Neighbourhood Plan being submitted to West Suffolk Council.

I look forward to hearing from you.

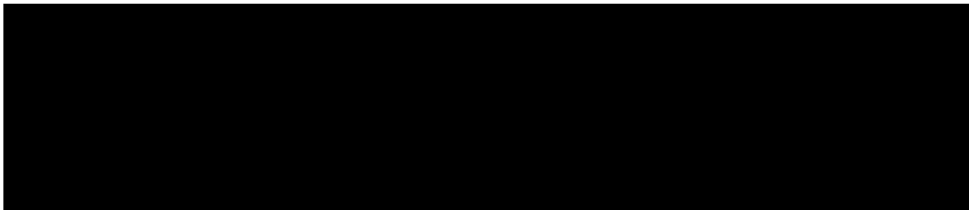
Kind regards



Connect with us:



BNP PARIBAS  
REAL ESTATE



Dear Sirs,

On behalf of our client, Fleur-Hill, please find attached our response to the Regulation 14 Local Plan. Also attached is our Vision Document for Land between Colethorpe Lane and Church Road, 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



Connect with us:



BNP PARIBAS  
REAL ESTATE

317

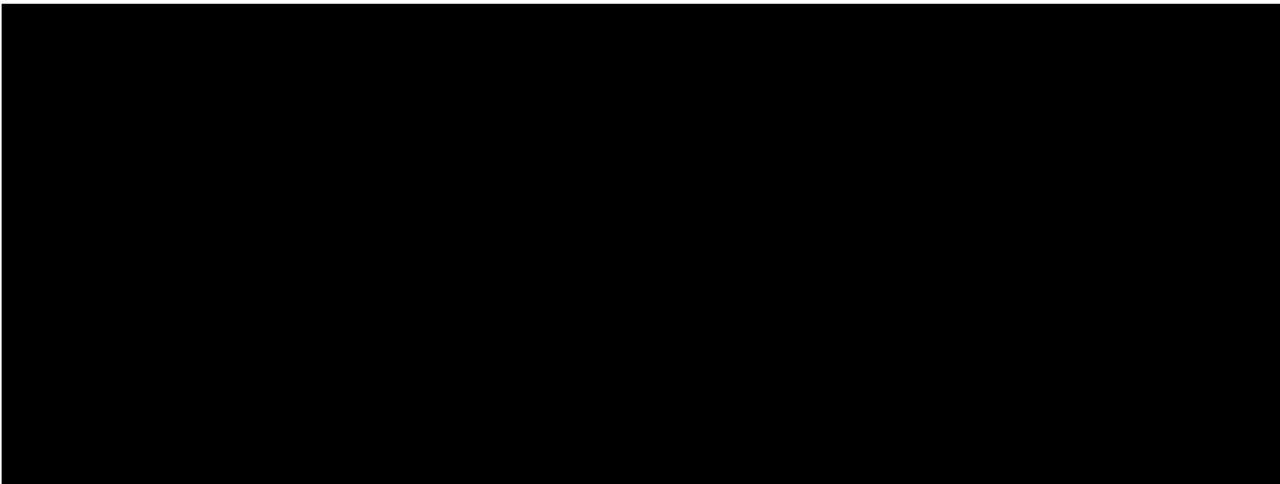
PC58

This email is confidential and may contain legally privileged information. If you are not the intended recipient it may be unlawful for you to read, copy, distribute, disclose or otherwise make use of the information herein. If you have received this email in error please contact us immediately. Strutt & Parker will accept no liability for the mis-transmission, interference, or interception of any email and you are reminded that email is not a secure method of communication.

Strutt & Parker is a trading style of BNP Paribas Real Estate Advisory & Property Management UK Limited, a private limited company registered in England and Wales (with registered number 4176965) and whose registered office is at 5 Aldermanbury Square, London EC2V 7BP.

For further details of Strutt & Parker please visit our web site

<http://www.struttandparker.com>.



Dear [REDACTED]

I write further to the email of and letter dated 14 June 2023 (below and letter attached for ease of reference), on behalf of my client, Fleur-Hill, regarding our query on the site selection process for the draft Barrow-cum-Denham Neighbourhood Plan.

We kindly and respectfully requested for your reply to our letter, and I note that we have not yet received a response.

Please note that, in the interim, we have been in discussions with Officers at West Suffolk District Council (WSDC) regarding the points raised in our letter. They have confirmed in correspondence that they have not issued any direction or advice to Barrow Cum Denham Parish Council that would prejudice or prevent the Parish Council from considering any sites (whether deferred in the emerging Local Plan or not) on a legal or policy guidance basis. They have confirmed that this is a matter and process for the Parish Council to consider. They also agree with our interpretation of the policy guidance that the Parish Council can consider any site in their selection process.

This would therefore appear to be contrary to statements made at various Parish Council meetings including on 4<sup>th</sup> September 2023, where Councillors have stated that they cannot legally consider our site.

At our public exhibition earlier this year (29<sup>th</sup> March 2023), a number of local residents raised concerns with us over the site selection process for the emerging Neighbourhood Plan. We therefore feel the statement that the site at Colethorpe Lane cannot be considered for 'legal' reasons and that it is based on guidance given by WSDC Officers is misleading to your parishioners and also a flaw in your site selection process.

4/7

PC58

Therefore, for the purposes of transparency, we would be grateful for your urgent attention on this matter in responding to our query in light of the current consultation on the draft Neighbourhood Plan. Please can you confirm your safe receipt of this email and attached letter, and your timescale for responding to our query on the site selection process?

I look forward to hearing from you.

Kind regards

[Redacted]

[Redacted]

Associate Director

Strutt & Parker

[Redacted]

Connect with us:    



[Redacted]

Dear [Redacted]

Please find attached a copy of a self-explanatory letter to Parish Council sent on behalf our client [Redacted] prepared by my colleague [Redacted] and sent by me while he is on leave. If you have any questions please feel free to direct them to me, or Sav who will be back next week.

Kind regards

5/7




PC58

Senior Associate Director

Direct: 01223 459493 Mobile: 07471 215456



**3 attachments**

-  **24.10.23 - Letter to Barrow Parish Councillors.pdf**  
214K
-  **2023.06.14 Letter to Parish Council.pdf**  
577K
-  **RE: Land west of Church Road and east of Colethorpe Lane, Barrow – Fleur-Hill .eml**  
1027K

617

PC58

Cambridge office



Parish Clerk  
Barrow-cum-Denham Parish Council

Direct Dial: 07717 512 146  
Email: [Redacted]  
Our Ref: 220933

24 October 2023

By email: [Redacted]

**For the attention of all Barrow-cum-Denham Parish Councillors**

Dear Councillors,

**RE: Fleur-Hill response to the Neighbourhood Plan Regulation 14 Consultation**

We write further to the draft Neighbourhood Plan consultation to which we submitted a detailed response on behalf of our clients [Redacted]. We hope that our response will be carefully considered and the benefits of Land between Colethorpe Lane and Church Road, Barrow, will be recognised.

A significant benefit of our proposal is the provision of land for the Primary School. We have engaged with EFM (who specialise in advice and guidance on educational establishments) to fully understand the needs of the school and the impact new development in the village could have on its capacity. As the Neighbourhood Steering Group is aware, most year groups at the school are already at capacity and without land to expand, the addition of 170 new homes to the village will likely mean that some pupils within the current catchment will no longer be able to secure a place.

Furthermore, EFM have advised that the current school site is too small to accommodate even its existing needs and is not operating to the preferred standards set by the Department of Education. The allocation of Land between Colethorpe Lane and Church Road will not only mean that the school site can be extended to meet existing needs, but it will also ensure the school can be expanded to meet new development in the village so that children within the catchment of the school can attend their local school.

Importantly, we understand through previous discussions with the school that they would be supportive of our proposals and need to expand at current levels. We trust that you as the Parish Council preparing the Neighbourhood Plan will have engaged and actively sought the school's opinion as a stakeholder in the village and provider of a significant public service. If this has not already been undertaken, we would suggest that this is a crucial consideration in the preparation of the Neighbourhood Plan.

It is worth noting that 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 or the fact that it is too small to accommodate its existing needs. Furthermore, there is the possibility that any financial contributions made could go towards other schools in the District rather than Barrow Primary school itself. As set out in our full response, Fleur-Hill held a public exhibition in the village hall on March 2023 at which our



proposals were presented to the local community. The response was overwhelmingly positive with many residents expressing a preference for the development of this site over Land to the East of Barrow Hill that has been identified as a draft allocation in the Local Plan. Of particular note we found:

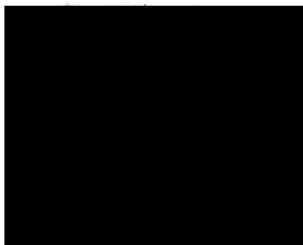
- 90% of respondents considered the Colethorpe Lane Development as being within their preferred 'development zone' within the village;
- 92% of respondents outlined their preference as the Colethorpe Lane site over the Barrow Hill and Bury Road site;
- 81% of respondents considered that the extra land being offered to the school was important for the village.

The findings from the public exhibition were echoed in the Neighbourhood Plan Consultation Questionnaire that also concluded that the preference of most residents is for new development to be located in the north western sector of the village. A significant benefit of this location is that less traffic will need to travel through the village, something that was highlighted as a key attribute by locals at the exhibition.

In reviewing the evidence base prepared in support of the Plan, we have noticed some inconsistencies with how potential sites have been assessed with preferential treatment appearing to have been given to the Land east of Barrow Hill. Our concerns are discussed in further detail in our response (and our letter of 14 June 2023), however, it worth noting again that 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 Land East of Barrow Hill because this has been identified as a potential allocation in the emerging West Suffolk Local Plan. The purpose of the Neighbourhood Plan, remember, is to give communities the power to shape development and growth in their area.

We do hope therefore the Steering Group will carefully review our response and recognise the important and tangible benefits Land between Colethorpe Road and Church Road can deliver to be village. If you require any further information or would like to set up a meeting to discuss our response in further detail, please do not hesitate to get in contact.

Yours faithfully,



1/8

PC59

 Gmail

[Redacted]

---

**Barrow cum Denham Neighbourhood Plan**

1 message

[Redacted]

Dear Neighbourhood Plan Working Group,

Thank you for submitting your Regulation 14 Neighbourhood Plan to West Suffolk Council. I attach this council's comments.

If you have any queries / would like to discuss our comments, please do let us know.

Congratulations on achieving this significant milestone in the plan's preparation.

With best wishes,

[Redacted]

[Redacted]

Principal Planning Officer

Email: [Redacted]

[www.westsuffolk.gov.uk](http://www.westsuffolk.gov.uk)  
**West Suffolk Council**  
#TeamWestSuffolk

West Suffolk Council supports our staff to work flexibly and we respect the fact that you may also be working at different times to suit you and your organisation's needs. Please do not action or respond to this message outside of your own working hours.

Report, pay and apply online 24 hours a day  
Find my nearest for information about your area

West Suffolk Council is the Data Controller of the information you are providing. Any personal information shared by email will be processed, protected and disposed of in accordance with the General Data Protection Regulations and Data Protection Act 2018. In some circumstances we may need to disclose your personal details to a third party so that they can provide a service you have requested, fulfil a request for information or because we have a legal requirement to do so. Any information about you that we pass to a third party will be held securely by that party. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website: [How we use your information](#)

\*\*\*\*\* This email is confidential and intended solely for the use of the individual to whom it is addressed. If you are not the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error please contact the Sender. This footnote confirms that this email message has been swept for the presence of computer viruses and content security threats. WARNING: Although the Council has taken reasonable precautions to ensure no viruses are present in this email, the Council cannot accept responsibility for any loss or damage arising from the use of this email or attachments. \*\*\*\*\*  
W-S-

---

 23 10 24 BcD NP WSC response\_.pdf  
124K

To Neighbourhood Planning Group  
**Barrow cum Denham**

Contact: Planning Policy

Email: [REDACTED]

Tel: 01284 757368

Date: 24 October 2023

Dear Sir/Madam

**West Suffolk Council officer response to the Barrow cum Denham pre-submission neighbourhood plan**

Thank you for consulting West Suffolk Council on the Pre-Submission Draft Barrow cum Denham Neighbourhood Plan. Overall, the plan is comprehensive, clear, and logical.

**Assessment of the Plan Proposals**

Please find attached a response on behalf of the Local Planning Authority (LPA). The strategic planning policy comments focus on the content and wording of the proposed policies and propose amendments or raise issues that we suggest need further consideration before Submission.

In addition, the Pre-Submission Plan policies were considered in relation to the 'Basic Conditions' required of a Neighbourhood Plan, which include:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State.
- Contribute to achieving sustainable development.
- Be in general conformity with the strategic policies of the development plan; and
- Be compatible with European Union and European Convention on Human Rights obligations.

**Habitats Regulations Assessment - Screening and Appropriate Assessment**

Habitats Regulations Assessment (HRA).

The HRA produced by Aecom screened in likely significant effects on European Sites due to urbanisation, recreational pressure, air quality, water quality, habitat fragmentation and hydrological changes (including water abstraction). Where matters could not then be screened out in the Appropriate Assessment, Aecom provided the following recommendations to address the likely significant effects.

#### Recreational Pressure:

The potential recreational pressure on the Breckland SPA is derived from the new homes allocated in the plan. It was recommended that financial contributions towards a strategic mitigation strategy would mitigate the likely significant effects.

The current plan does not address this matter and the relevant policies should be revisited, as per paragraphs 6.38 and 7.4 of the HRA.

The HRA did not anticipate that the allocation in the plan would require a bespoke Suitable Alternative Natural Greenspace.

#### Air Quality:

The HRA also recommended a review of the Air Quality findings at the 'preferred options stage' taken here to mean the Regulation 14 consultation. The plan under BCD10 iv appears to put this off to a development management stage, which may require further clarification in relation to the allocation in this plan.

#### Water Quality

In terms of Water Quality, paragraph 6.66 refers to the St Edmundsbury Rural Vision 2031 which states "Therefore there will be a need for additional water infrastructure and or treatment upgrades to support new development in the village." It is not clear from the plan whether this infrastructure has been agreed with the water company and BCD2 does not provide information or requirements on water, save criterion vii.

#### **Strategic Environmental Appraisal**

A Strategic Environmental Appraisal, produced by Aecom was published alongside the Regulation 14 plan. The Council has no comment to make on this appraisal.

#### **Demonstrating an effective Pre-submission Plan consultation**

Policies within a Neighbourhood Plan need to be deliverable, and to this end any proposed allocations/ designations of land/ land use ambitions, should be made with the agreement of the relevant affected landowners. This appropriate consultation with third party landowners, should be evidenced within your Consultation Statement at Submission stage.

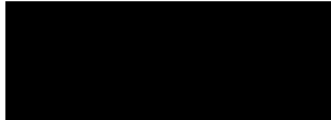
If substantially material alterations are made to the content of the Neighbourhood Plan following feedback from the Pre-Submission Plan consultation (Regulation 14 stage), then careful consideration should be given to re-undertaking Pre-Submission consultation before advancing to the Submission Stage.

One of the tests that the LPA must consider at the Submission stage is whether the General Regulations have been complied with; the General Regulations do not expressly require a re-consultation if the draft plan is significantly amended after the consultation. However, West Suffolk Council consider that it would be difficult for the LPA to allow the plan to proceed to examination on the basis that "details of the

proposals for a neighbourhood plan" had been publicised in accordance with Regulation 14, if entirely new proposals have been inserted, or the Plan proposals have been significantly altered from those publicised.

If you have any queries about the council's comments which are outlined in the table attached to this letter, please do not hesitate to contact Ann-Marie Howell who is the principal planning policy contact for this neighbourhood plan.

Yours faithfully



Strategic Planning Service Manager

**West Suffolk Council Strategic Planning comments on draft Barrow cum Denham neighbourhood plan.**

Location	Comment
General	When referencing adopted Development Plan policies please add the phrase ( <i>or as superseded</i> )
Para 2.21	It is unclear that the industrial land has not been implemented. RV10 (b). Can this be made clearer?
Figure 2	Can this be improved for better legibility?
Para 3.2	Typo. The full range of services in Barrow are <u>in</u> illustrated in the graphic overleaf.
Para 3.3	<p><i>In terms of ecological interest, there are no national, or other habitat designations, in close proximity to Barrow, although there is a county wildlife site located south of the village.</i></p> <p>It would be helpful to reference the SPA / SAC Zone of Influence and its impact on the plan area.</p>
Para 3.15	<u>Compass House</u> – should this read <u>Companies House</u> ?
Para 3.44	<p>How will this be achieved? '4 The aspiration of this Plan is to help enable local people to stay in Barrow-cum-Denham as their household needs change'.</p> <p>This does not appear in the housing objectives on page 45.</p>
Para 3.60	The five purposes of a Green Belt do not include an 'attractive' 'landscape.' This is slightly misleading – perhaps rephrase or delete Green Belt.
Para 3.77	See para 3.3 comment above and update this paragraph referencing the mitigation strategy.
BCD1	<p>iii – this may impact rural exception sites.</p> <p>iv – are these views defined?</p> <p>vi – perhaps remove the word 'limited'</p>

BCD 2	<p>Typo. and east <u>f</u> of Barrow Hill.</p> <p>It is noted that the proposed neighbourhood plan allocation is different to those proposed by West Suffolk District Council in its preferred options local plan (Reg 18) which was subject to consultation in 2022. The sites proposed in the local plan are considered to meet the neighbourhood housing requirement for Barrow cum Denham and perform more highly in terms of sustainability and connectivity to the village. In addition, the smaller site proposed at Denham Lane also assists the council in meeting the national requirement of ensuring 10% of all sites in the plan are on sites of less than one hectare.</p> <p>However, national planning policy guidance (<a href="http://www.gov.uk">Neighbourhood planning - GOV.UK (www.gov.uk)</a>) is clear that neighbourhood plans can select alternative sites to those in a local plan.</p> <p>Paragraph 044 of that guidance states that <i>'Should there be a conflict between a policy in a neighbourhood plan and a policy in a local plan or spatial development strategy, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.'</i></p> <p>The local plan submission draft plan (reg 19) will be subject to consultation in early 2024 and will then be submitted to the planning inspectorate for Examination.</p>
BCD 2.1	<p>What does 'erosion' mean here? Also, note coalescence can be positive e.g., for infrastructure</p>
BCD 2.3	<p>Ensure that the existing residential amenities of residents in Beale Road, Bury Road, Dale Tree Road, and Lion Green are suitably protected.</p> <p><i>what does this mean?</i></p>

BCD 2 iv	Is there evidence of a need for a care home?
BCD 5 v	This lacks clarity – is this policy necessary and deliverable?
BCD 8	<p><i>Expansion of the existing primary school. Support.</i> This is quite specific – it could be better to require additional form entries for school provision. Also perhaps remove reference to the school 'at the northern part of the main settlement – to provide flexibility.</p> <p>The list of services to be protected is quite prescriptive.</p>
Habitats Regulations Assessment	As stated in this letter.
Strategic Environmental Assessment	As stated in this letter.

i/b

PC60



---

**Objections to the Barrow cum Denham Neighbourhood Plan Regulation 14 -  
24/10/23**

1 message




To the Parish Council

Please accept the attached **objections** to the proposed Barrow-cum-Denham Parish Council's Neighbourhood Plan, Regulation 14. It may be subject to amendments or further additions at any future consultations held by West Suffolk Council and the Inspectorate.

Kind regards



---

 **Objections 24 Oct 2023 - final summary doc.pdf**  
144K

## Response to Regulation 14 Public Consultation Barrow-cum-Denham PC NP:

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

### Site selection - Barrow Hill

1. The Parish Council (PC) choice of site at Barrow Hill doesn't appear to be evidence-based. Site summary evaluation scoring taken from the PC's own commissioned report from Aecom, was recorded in the minutes from the PC meeting dated 25/8/22 and shows site B (Bury Road) to have the highest score at 28.5 and site C (East & West of Barrow Hill & South of Barrow Forge) in 3<sup>rd</sup> place, with a score of 23. Following an exchange of Councillors' views, in the same meeting, and in the 'Extraordinary Meeting' dated 18/10/22, the PC voted in favour of site C, a vote which I believe doesn't seem to be evidence-based but follows a discussion of personal opinions and preferences.

The 5 sites selected by the PC at the time of voting (table shows Aecom's site assessment scoring for these sites)			Scores	Position
A	West of Barrow Hill	BD 12	22.5	4
B	South of Bury Road	BD 13	28.5	1
C	East & West Barrow Hill & South of Barrow Forge	BD 6, 8, 12	23	3
D	East & West Barrow Hill & South of Barrow Forge & South of Denham Lane	BD 6, 8, 12, 9	20	5
E	South of Bury Road & South of Denham Lane	BD 9 & 13	26	2

2. Colethorpe Lane, parishioners' preferred area, by a vote of 54.7% in the PC's own 2020 Parishioners' Questionnaire, a leading document for the Neighbourhood Plan (NP), seems to have been excluded completely from the PC short-list of sites.
3. West Suffolk Council's (WSC) housing allocation for Barrow is for 170 dwellings, nothing more. The provision of a care home, commercial and sports facilities at Barrow Hill, included in the NP, do not appear to be evidence-based. Parishioners did not express a desire for any of these in the PC's own 2020 Parishioners' Questionnaire (a supporting document for the NP). So why cover much more of Barrow's countryside with concrete than is necessary.
4. As the NP site of preference at Barrow Hill, is unnecessarily large to accommodate the WSC allocation of 170 houses for Barrow, I believe that there is a risk of additional housing (or other buildings, or being left as wasteland), as 13.6 Hectares at 30 dwellings per Hectare (national minimum density target) would accommodate 400+ houses, if the care home, commercial and sports facilities are not taken up. There has been no uptake for the commercial site in the Woodland Rise development since 2019, and care homes all over the country are closing because of difficulty in recruiting staff, so this is a very real possibility.
5. By selecting a site that is different to that in the WSC emerging Local Plan (LP), there seems to be a risk that the dwellings at Barrow Hill will be built in addition to those in the WSC emerging LP, doubling the quantity of houses ( $170 \times 2 = 340$ ), plus a care home, commercial and extensive sporting facilities, which if not taken up (as above) will mean  $408 + 170$  houses = 578.

6. Around an extra 300 vehicle movements per day which affect the entire length of the village and impact heavily on Barrow Hill, will be created from the housing allocation of 170 dwellings alone. If the NP proposed care home, commercial buildings and other facilities are taken into consideration, this will create many more daily vehicle movements. This would be directly in conflict with the national strategy to maximise sustainability and minimise private transport. *Whereas Colethorpe Lane is easily accessible from the A14 and the Bury Road site from Bury St Edmunds.*
7. Construction traffic will likewise have to ply backwards and forwards along Barrow Hill and The Street to build a development at Barrow Hill.
8. Barrow Hill is a country road and not wide enough to be used as a main road. It has one narrow pavement, on one side only resulting in vehicles being dangerously close to pedestrians. The proposed increase in traffic will exacerbate this further.
9. Cycle paths identified in the plan don't go anywhere, and there is no opportunity for future expansion along Barrow Hill as the road isn't wide enough.
10. The Street, in Barrow and Barrow Hill are prone to large areas of standing water, causing cars to drive extremely slowly through very deep water and creating high water movement at the sides of the road, drenching pedestrians. The village, like most other villages, has ancient drainage systems of gullies at the side of the road, which were not intended to support the increase in development currently asked of them. (Described more fully in the 2 objections sent separately 23/10/23, for which more photos and videos are available to evidence this.)
11. Many residents on the Woodland Rise development and Barrow Hill seem to be experiencing problems with the foul drainage system. It seems that the system was installed years ago and not intended for the number of houses it is being asked to support nowadays. Again, no provision has been put in place to update these systems and correct this prior to further building and increasing demand on it. (Described more fully in the 2 objections sent separately 23/10/23.)
12. There has been a disproportionate amount of new housing in the south of the village, and the proposed development, is again at Barrow Hill, causing polarisation, isolation, and lack of integration of the new residents with the rest of the village, resulting in a divisive 'new' and 'old' Barrow social dynamic, and Barrow Hill becoming a satellite area which would spoil the integrity of the village.
13. When driving into the village from Hargrave, the southern gateway to the village, I believe the proposed site at Barrow Hill will be particularly visible for some distance, and likewise when driving in from the east along Bury Road, causing the natural view of the village and its distinctiveness as a rural area to be compromised.
14. The outbuildings on the land south of Beale Road which are earmarked for development in the proposed NP, have the appearance of large asbestos curved concrete roofs. If this is the case, demolition may cause potential airborne asbestos fibres and environmental contamination to the soil for extended periods. These may cause health risks to village residents and wildlife. Mitigations may allow safe working for the demolition crew, but the toxic environmental pollution may still pose an ongoing risk for residents. Has this been considered when selecting a site to build 170 new homes?
15. The ancient woods, 'Wilsummer Woods' and County Wildlife Site would be in much closer proximity to the proposed development and the building of new houses would permanently affect the surroundings in which this heritage asset is experienced, and as the proposed site is on a hill, sloping towards this area, will pose an increased risk to standing water and

flooding, as it is already boggy in that area, this could affect this heritage area and the ancient trees and a loss of biodiversity and disturbance to the natural environment.

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

### The process

17. The main purpose of the NP is so that any further development in the village is based on parishioners' preferences and views. The PC's own 2020 Parishioners' Questionnaire, a leading document for the NP, shows a village majority of 54.7% who voted in favour of development in the part of Barrow to the North of the village. However, the decision for the site choice was made after a discussion amongst Parish Councillors and based on their own views, (as referenced in the PC meeting minutes dated 25/8/22 and 18/10/22).
18. Barrow Hill is not the highest scoring site, as shown in the PC's own commissioned, AECOM report.
19. As such, the site choice is not evidence based (items 17 and 18 refer).
20. Some residents were surprised to find that only the Barrow Hill site has been included in the NP. It also seems to have created the impression that it is a 'fait accompli', especially with the amount of work that has been carried out so far, and the display at the public exhibition, and some feel that therefore, there is little point in raising objections.
21. A statement, from the PC meeting of 5/9/22, records that residents are "reminded ..... that if the NP is voted down the village will be totally exposed", which seems to give parishioners the impression that if they vote against the NP, the parish might be subject to large scale over-development.
22. The actual situation in September 2022 was that WSC had published a modest site allocation in their emerging LP for preferred housing sites at Denham Lane & Bury Road.
23. The planning consultants, Turley, who have been engaged to draft the NP and supporting Regulation 14 information, were also engaged by the Barrow Hill landowners and Pigeon for the land at Barrow Hill. It is important to have transparency and for due process to be followed, by engaging the same planning consultants, it isn't possible to have a separation of duties and could present a conflict of interests.

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

24. Parishioners' preferred area for development, was excluded from the short-list of sites, when the PC voted on site selection in October 2022, as detailed in point 18 and 2.
25. The site between Colethorpe Lane and Church Road seems to have been rejected by the PC on the grounds that it doesn't adjoin the settlement boundary. However, it seems that it is within or adjacent to the bounds of the actual, physical settlement and that part of the site has already been allocated under the current LP and is therefore likely to change the current settlement boundary within the timeframe of the NP. It would seem, that the school itself, doesn't sit within the settlement boundary either, an anomaly that has existed for some years and which at some point will need to be addressed, and could have been done at the same time as this site.

26. In the PC meeting minutes dated 18/10/22, Cllr Holmes "stated that the impact from traffic movement would be less from the Bury Road site. However, he did not agree with either site [Barrow Hill or Bury Road] and had always backed the site at Church Road as it would reduce the traffic through the village and provide the school an opportunity for expansion. As this site was not being considered, Cllr Holmes stated he would abstain from voting on the site selection."
27. A letter sent to the PC and read out during the meeting dated 17/7/23, questioned a PC response in the previous meeting, which referred to WSC's allocation of sites in their emerging LP for Barrow, when again the question was raised as to why the Colethorpe Lane/Church Road site wasn't being considered as part of the NP. The letter stated that, 'According to the relevant sections of the National Planning Policy Guidance: "Plan Making" and "Neighbourhood Planning" ... can allocate ... alternative sites to those in an emerging LP where it is supported by evidence to demonstrate need/local circumstances which differ from those identified in an emerging LP.'
28. In the PC meeting dated 4/9/23, it was said that WSC could not legally consider the Colethorpe Lane site, and that the local council have been approached many times, but it would seem, it is a matter for the PC to consider whether deferred in the LP or not.
29. Some of the advantages of developing in the Colethorpe Lane/Church Road area are:
- I. The developer has offered to gift one hectare of land, to the school, to use if they require it and as they see fit. (The increase of 170 dwellings in the village, will put extra pressure on the school to support those children in the catchment area.)
  - II. The Colethorpe Lane/Church Road site is in a much more sustainable location and will have less of an impact on traffic movements through the village as vehicles are likely to travel towards the A14.
  - III. The site is adjacent to the school so reducing the number of cars through the village at the time of school runs, and yet still within a 10 minute, walk of other local amenities.
  - IV. There is potential for additional traffic calming to be introduced along Colethorpe Lane as part of the proposals, subject to agreement with the County Council.

#### Site selection – Bury Road

30. AECOM's Strategic Environmental Assessment, with reference to the Historic Environment at Bury Road seems to be based on errors which affects the site's ranking. Contrary to this report, the Bury Road site has no impact on The Weeping Willow Public House or Barrow House. In fact, a new build has recently received planning approval and is currently under construction, right next door to the Weeping Willow pub. In addition, the nature of Bury Road is already changed, as there are many newer builds all along Bury Road and adjoining the 2 above properties.
31. The NP contains multiple references to the issue of coalescence between Barrow and Burthorpe, when they are already in very close proximity, and in the PC meeting minutes dated 25/8/22, it was recorded that, 'Cllr Kronbergs disagreed that coalescence with Burthorpe would be an issue as there are houses further down Bury Road already, past Burthorpe.' In addition, the Bury Road site plan shows that there is a substantial green, open space incorporating ponds for a sustainable drainage system at the north-east of the site.

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

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

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

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

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

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

#### **Site selection – Denham Lane**

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



# Barrow-cum-Denham Neighbourhood Plan

## Regulation 14 Pre-Consultation

Representation on Behalf of Bloor Homes

On behalf of **Bloor Homes**



## Document Control Sheet




**Project Name:** Barrow

**Project Ref:** 33679 – Barrow

**Report Title:** Regulation 14 Neighbourhood Plan Response

**Doc Ref:** 201023/A5/AV/AF- Response

**Date:** 24.10.2023

	Name	Position	Signature	Date
<b>Prepared by:</b>	Anett Vild	Planner		13/10/2023
<b>Reviewed by:</b>	Andrew Fisher	Planning Director		24/10/2023
<b>Approved by:</b>	Andrew Fisher	Planning Director		24/10/2023
<b>For and on behalf of Stantec UK Limited</b>				

Revision	Date	Description	Prepared	Reviewed	Approved

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

## Contents

<b>1</b>	<b>Introduction</b> .....	<b>1</b>
<b>2</b>	<b>Evidence Base</b> .....	<b>2</b>
2.2	Site Options and Assessment Report (September 2021 - AECOM) .....	2
2.3	Strategic Environmental Assessment for the Barrow cum Denham Neighbourhood Plan (June 2022 - AECOM) .....	4
2.4	Strategic Environmental Assessment for the Barrow cum Denham Neighbourhood Plan (September 2023) AECOM .....	7
<b>3</b>	<b>Neighbourhood Plan Process</b> .....	<b>8</b>
<b>4</b>	<b>Barrow Hill Allocation Proposal Changes</b> .....	<b>10</b>
4.2	First Version .....	10
4.3	Revised Version .....	11
4.4	Allocated Version .....	12
4.5	Summary .....	13
<b>5</b>	<b>Bury Road Public Consultations</b> .....	<b>14</b>
5.2	Summary of Public Consultation .....	14
5.3	Summary .....	17
<b>6</b>	<b>Conclusion</b> .....	<b>18</b>

## Appendices

Appendix 1	WSLP Draft Allocation
Appendix 2	NP Unavailable Meeting Minutes
Appendix 3	Parish Meeting Minutes 25 Aug 2022
Appendix 4	Parish Meeting Minutes 5 Sep 2022
Appendix 5	Barrow Hill Revised Proposal 2

This page is intentionally blank

## 1 Introduction

- 1.1.1 This representation has been prepared by Stantec on behalf of Bloor Homes in respect of the Regulation 14 Pre-Consultation of the draft Barrow-cum-Denham Neighbourhood Plan. This representation is intended to assist the Neighbourhood Plan team in the production of the Neighbourhood Plan and reflects discussions that have been undertaken between Bloor Homes and the Parish Council as well as the outcomes of Public Engagement undertaken by Bloor Homes with residents of Barrow.
- 1.1.2 Barrow is located approximately 7 miles west of Bury St Edmunds, and south of the A14. Within the emerging West Suffolk Local Plan (WSLP) (Reg 18) the village is categorised as a Key Service Centre, which is designated to take 170 dwellings over the plan period to 2036 on two sites: Land off Bury Road (Site 3.01a) for 150 dwellings, and land south of Denham Lane (Site 3.01b) for 20 dwellings.
- 1.1.3 Bloor Homes site, Land off Bury Road, Barrow is located to the north-eastern edge of the village, adjacent to the existing settlement boundary for Barrow and to the west of Burthorpe. It should be noted that as part of the allocation in the emerging WSLP, (3.1. Barrow) the settlement boundary is due to be extended to encompass the Bury Road site. Please see draft site allocation in **Appendix 1**.
- 1.1.4 In light of the above it should be noted that the Neighbourhood Plan is inconsistent with the emerging Local Plan and does not allocate the Bury Road site.
- 1.1.5 Bloor Homes object to the Neighbourhood Plan based on the inadequacies of the evidence base, the Neighbourhood Plan process and inconsistency with the evidence base and emerging Local Plan in terms of site allocation. Furthermore, Bloor Homes object to the allocation of Barrow Hill. Bloor Homes would be happy to discuss any of the content of this response with the Neighbourhood Plan team in order to allow the Plan to move forward in a coherent and effective manner.
- 1.1.6 This representation is structured as follows:
- Section 2: Will establish that the evidence base clearly demonstrates that the Bury Road site is the preferred option for allocation and development as opposed to the Barrow Hill site.
  - Section 3: Demonstrates the flawed nature of the Neighbourhood Plan preparation process. The representation also draws attention on how the Barrow Hill site proposal has changed and the flawed judgment of its assessment and allocation, as well as its inaccurate representation in terms of capacity.
  - Section 4: Finally, the representation sets out Bloor Homes continued engagement process with the local residents and that the feedback received from this identifies the Bury Road site as the preferred option for allocation.

## 2 Evidence Base

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

Site Name	Neighbourhood Plan Call for Sites	West Suffolk Issues and Options Site Submission Review 2021
Land east of Barrow Hill	BD6	WS010 (A)
Land south of Barrow Forge	BD8	Part of WS228A
Land west of Barrow Hill	BD12	WS1078 & part of WS228(A)
Land south of Bury Road	BD13	WS011
(Land either side of Barrow Hill)	BD11	WS228(A)

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

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

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

#### Accessibility

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

#### *Barrow Hill site (Bd6, BD8 and BD12)*

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

Bury Road site (BD13)

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

Summary

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

**Relation to the village**

Barrow Hill site (BD6, BD8 and BD12)

- 2.2.6 **BD6** was considered to be well related to the built form and settlement pattern of the village, however, development of the site would require a defensible boundary to the east, and further assessment would be required to understand other environmental issues such as **archaeological finding and recreational pressure.**
- 2.2.7 With regards to site **BD8** the SOAR concluded that development of the site has potential to place recreational pressures on the County Wildlife Site, and due to the existing small size of the settlement '**major growth has the potential to create a ribbon of development away from the existing centre**'. It should be also noted that the St. Edmundsbury LDF Opportunities and Constraints (2012) document **identifies** approximately the whole extent of **the site (BD8) as part of a landscape buffer to prevent further growth to the south of Barrow.**
- 2.2.8 Furthermore, development of the site (**BD8**) **would elongate the village to the south**, and it would require open space and screening to the east to mitigate against recreational pressures on the nearby County Wildlife Site.
- 2.2.9 Although development of the **BD12** site has potential to continue the built form and settlement pattern, the development **would elongate the village to the south 'potentially creating ribbon development away from the centre, whereby development should be sited as close as possible to the existing facilities within the settlement'** (as identified in the *Opportunities and Constraints Rural Vision 2031 supporting document (St. Edmundsbury LDF Opportunities and Constraints (2012))*). Whilst the site is potentially suitable for allocation it should only be considered if no other more sustainable sites be found suitable.

Bury Road site (BD13)

- 2.2.10 It is acknowledged that growth of Barrow 'is restricted by the potential threat from coalescence with Burthorpe' and therefore a distinctive break in development should be retained. To avoid further coalescence between Barrow and Burnthorpe, the SOAR notes that there is potential to reduce the BD13 site area to the western half of the site in line with the built form of the Dale Tree Road residential area to the north, and the site is potentially suitable for allocation consideration on a reduced site area. Furthermore, Cllr Kronbergs '*disagreed that coalescence with Burthorpe would be an issue as there are houses further down Bury Road already, past Burthorpe.*' during the Parish meeting held on 25 August 2022 (Appendix 3).
- 2.2.11 Bloor Homes design team has taken this on board and prepared a masterplan layout which sets back proposed development from the eastern part of the boundary with Bury Road and

provide a Community Nature Park with multi-purpose landscaped SuDS. As such, the proposed layout retains the visual separation between Barrow and Burnthorpe and avoids any coalescence between the two settlements.

#### Summary

- 2.2.12 In summary, BD8 and BD12 has the potential to elongate the settlement and **'create a ribbon of development away from the existing centre'**; and BD6 requires further assessment to understand environmental issues such as **archaeological findings and recreational pressure**.
- 2.2.13 Whilst the close vicinity of Burnthorpe to the **Bury Road site (BD13)** is potentially restricting, the proposed layout addresses the concerns raised and with not proposing built up from in the northeast part of the site, sufficient separation is achieved.

#### **SOAR Summary**

- 2.2.14 The SOAR summary shows that Sites BD6, BD8, BD12 and part of BD13 were found to be potentially suitable for allocation in the Neighbourhood Plan subject to issues such as access, landscape buffer, open space mitigation, screening and risk of coalescence being addressed.
- 2.2.15 Bloor Homes have demonstrated that the masterplan for BD13 has addressed the coalescence risk and therefore the site is clearly suitable for allocation, and presents a better, more logical, well located and deliverable site than BD6, BD8, or BD12.

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

- 2.3.1 The Strategic Environmental Assessment for the Barrow cum Denham Neighbourhood Plan (June 2022) (SEA22) was prepared by AECOM reflecting that the housing requirement for Barrow cum Denham as 170 new dwellings to support the choice of a development strategy for the Neighbourhood Plan.
- 2.3.2 SEA22 has assessed a number of spatial strategy options as reasonable alternatives. These spatial strategy options comprise packages of the sites identified in SOAR, which are summarised below:

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

- Option A: Delivery of new housing through an allocation at Site BD12.
- Option B: Delivery of new housing through an allocation at Site BD13. (Bury Road Site)
- Option C: Delivery of new housing through allocations at Site BD6, Site BD8 and Site BD12. Specifically, the sections of the sites which, when combined, create a neat edge to the southern part of the village. (Barrow Hill Site – *as allocated in the Reg. 14 Neighbourhood Plan*)
- Option D: Delivery of new housing through allocations at Site BD6, Site BD8, Site BD9 and Site BD12. All four sites are identified as having direct access to the existing road network.

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

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

**Table 4.11 Development strategy options: summary of rankings by SEA Theme**

SEA Theme	Option A	Option B	Option C	Option D	Option E
Biodiversity and Geodiversity	=3	=1	=3	=3	=1
Climate Change	=3	=1	=3	=3	=1
Landscape	2	4	1	3	5
Historic Environment	=1	=4	=1	=1	=4
Land, Soil and Water Resources	=3	=3	1	2	5
Population and Community	3	=1	=4	=4	=1
Health and Wellbeing	3	=1	=4	=4	=1
Transportation	=3	=1	=3	=3	=1

#### Landscape

- 2.3.4 Whilst SEA22 considers Option C to perform most favourably in relation to the landscape, the argument for Option B was that the development of the site would be less in keeping with the existing built form and development patterns, **but the design of the new development could link with the existing housing to the north and west.**
- 2.3.5 It is our position that Bloor Homes proposed masterplan has addressed the above point and would link the new development well with the existing housing in the adjacent sites. The proposal resembles the street line and built character of Barrow cum Denham. It is proposed that the development would provide a broad mix of new homes and tenures, providing high quality accommodation for both families and smaller households. It would also deliver a high-quality landscaped scheme to integrate and reflect the landscape setting of the site. The proposed masterplan of the Site ensures that the existing residential amenities of residents to the north and west are suitably protected.
- 2.3.6 It is therefore our opinion that the masterplan addresses the minor concerns raised by the SEA22 and therefore would be an appropriate option in terms of Landscape.

### Historic Environment

- 2.3.7 SEA22 notes that consultation with Historic England is encouraged to ensure that development proposals at Site BD13 seek to implement sensitive design which respects and enhances the setting of nearby heritage assets (Barrow House and Carriage Gateway; and The Weeping Willow Public House).
- 2.3.8 We consider that the proposed development can appropriately address the historic surrounding of the site. We would also note that views from the mentioned 'Barrow House and Carriage Gateway' to the east are partially obscured by existing mature and tall tree lines along the site boundary as well as within the garden of the 'Barrow House'.
- 2.3.9 With regard to impact on 'The Weeping Willow Public House', the proposed masterplan includes extensive tree planting along the site boundary and especially to the northwest corner. This will minimise any visual impact on the heritage asset. Furthermore, it is considered that any detailed design work will address the location of the heritage asset and will protect its setting.

### Land, Soil, and Water Resources

- 2.3.10 SEA22 notes that all the proposed site allocations comprise areas of greenfield land, all options have the potential to result in the permanent loss of productive agricultural land which cannot be mitigated. The only reason why Option C and Option D (Site BD6) are slightly more favourable in this respect, is that a small area in the northeastern section of the site is previously developed land. It should be noted that the developed area within BD6 is approximately 1.02ha.
- 2.3.11 We would like to highlight that the cumulative site area for **Barrow Hill site (BD6, BD8, BD12)** is equates to **13.51ha** (based on site areas included in the SOAR); in comparison **Bury Road site (BD13)** only **10ha** in area.
- 2.3.12 Following the logic of the SEA22 assessment the loss of overall agricultural land (even with the already developed land discounted of 1.02ha from Barrow Hill site) would be less if the **Bury Road site (BD13)** is allocated, rather than the Barrow Hill site which would result in a loss of 12.49ha of agricultural land; opposed to the 10ha loss from developing **Bury Road site (BD13)**.
- 2.3.13 In terms of water resources and soil conditions all sites are considered to have the same characteristics.
- 2.3.14 Based on the above we consider that in terms of Land, Soil, and Water Resources the Option B, **Bury Road site (BD13)** would have the least impact and as such should be considered as favourable.

### **SEA22 Summary**

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

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

- 2.4.1 Along with the Neighbourhood Plan Reg 14 consultation an alternative Strategic Environmental Assessment ('SEA23') was published.
- 2.4.2 We note that the SEA23 is significantly less detailed or informative than the SEA22.
- 2.4.3 SEA23 after summarising the SEA22 goes on to briefly notes that:
- “Since the completion of the reasonable alternatives assessment (June 2022) (SEA22), further discussions between the neighbourhood group, the Parish Council, and site promoters have taken place with respect to the design of the preferred site allocation.”*
- 2.4.4 We emphasise that no further information, evidence base, or meeting minutes of the extraordinary meeting on 17th October 2022 (where Barrow Hill site was allocated) are available which would demonstrate that the Barrow Hill site is a better, more sustainable, preferred or appropriate location for allocation.
- 2.4.5 The lack of evidence provided for concluding and allocating the Barrow Hill site over the Bury Road site, which is supported by sufficient evidence base, is considered to be untransparent and flawed in legibility. This is particularly the case given the fact that the Barrow Hill proposals that were presented to the Parish are now fundamentally different to those that are now being proposed through the Neighbourhood Plan with the community and sports benefits substantially reduced (see Section 4 below).
- 2.4.6 Therefore, we are of the opinion that the SEA23 lacks any credible evidence and does not provide any significant or concrete information on how the previous evidence base was disregarded and a site which ranked as the 3<sup>rd</sup> option out of 5 gained allocation.
- 2.4.7 The site has been ranked third best in both the WSLP and AECOM research for the Neighbourhood Plan; however, the Parish felt that to allocate the alternative site, and their local connection with the landowners would better their chances of receiving the community benefits. This is not an evidence based, planning reason to allocate the site and does not bear scrutiny, especially given the substantial changes to the Barrow Hill proposals (see Section 4).

### 3 Neighbourhood Plan Process

- 3.1.1 The Parish Council have reluctantly accepted the figure of 170 homes, and based on the evidence base there are two potential sites for meeting this need, these being the Bury Road site and the Land off Barrow Hill.
- 3.1.2 Bloor Homes have continued communication with the Parish Council, to present a draft scheme to the Parish Council as part of a 'site comparison exercise' run by the Neighbourhood Planning Group. Bloor Homes was offered a 20-minute slot at short notice to present the scheme in an open public meeting, including details of potential community benefits (meeting minutes included in Appendix 4). The alternative scheme at land off Barrow Hill was also presented. It is emphasised that this site on Barrow Hill, is unfavourably ranked in the emerging evidence base for the both the Local and Neighbourhood Plan when compared to the Bloor site at Bury Road.
- 3.1.3 A further meeting was held with three members of the Neighbourhood Planning Group, of whom all sit on the Parish Council. Both Bloor Homes site and opposing sites were offered private meetings. The meeting sought to understand the proposed community benefits of the schemes, and to discuss issues and questions held by the Neighbourhood Plan Group.
- 3.1.4 Subsequent emails were exchanged regarding a proposed list of community benefits. This was accompanied with an offer by Bloor Homes to maintain communication and engagement with the Local Parish/Parishioners, to develop a sustainable community 'led' scheme.
- 3.1.5 A further meeting with both sites was requested by the Parish Council to 'iron out' final issues, and gather further clarity on the community benefits. Bloor Homes would have been very happy to engage in this discussion and indeed would have welcomed the opportunity, however, these meetings were called off at short notice with limited explanation.
- 3.1.6 A public, extraordinary meeting was called for the 17th October 2022, where the Parish explored the benefits of both sites. The Parish resolved to allocate the alternative site on Land off Barrow Hill. We like to draw attention to the fact that **the Minutes of the Extraordinary Meeting called 17th October 2022 have not been made available** as shown on the extract in Appendix 2.
- 3.1.7 The Barrow Hill site has been ranked third best in both the WSLP and AECOM research for the Neighbourhood Plan. The Parish felt that to allocate the alternative site, and their local connection with the landowners would better their chances of receiving the community benefits. This is an entirely inappropriate and flawed approach as any contribution would be secured by a S106 agreement which is a legal contract and therefore any personal relationship/connection would be irrelevant.
- 3.1.8 Bloor Homes have carried out public engagement with the residents of Barrow to understand what community benefits would be sought by residents. Bloor Homes can confirm that having reviewed the results of the public consultation the following community benefits could form part of the Bury Road proposals: enhancing the current village hall, subsidies for bus services for 20 years, expansion of the school, expansion of the doctors/larger site, upgrading sports facilities or upgrading footpaths. Bloor Homes offered that the S106 agreement would be drawn up after consultation with the Parish Council. This position is as evidenced in the Parish Meeting Minutes from 05.09.2023 in **Appendix 4**.
- 3.1.9 Therefore, we would like to reiterate that any contribution would be subject to S106 agreement and there is no difference between having an agreement with someone whom with the parish council has a connection with (e.g Barrow Hill) or not (e.g. Bury Road).

- 3.1.10 Most importantly, as demonstrated in detail in the following section, the initial proposal of Barrow Hill site has significantly changed, and the proposed public benefits and facilities have been removed from the scheme.
- 3.1.11 The main reasons for the Barrow Hill site being favoured were the provision of such facilities and benefits. Given that these have been omitted over time/evolution of the masterplan it is questionable why the Parish still included it as allocation in the Reg 14 draft Neighbourhood Plan.
- 3.1.12 Furthermore, the allocation of the site is for 170 dwellings; however, we would like to draw attention to the fact that by simply calculating the site capacity with the location appropriate density (30d/ha), the Barrow Hill site has approximately **217.8** dwellings capacity, which is 47.8 more than the presented 170 dwellings capacity.
- 3.1.13 This figure is calculated as below:

Site	Site area (ha) from SOAR
<b>BD6 (Land east of Barrow Hill)</b>	8.6
<b>BD8 (Land south of Barrow Forge)</b>	1.41
<b>BD12 (Land west of Barrow Hill)</b>	3.5
<b>BD13 (Land south of Bury Road)</b>	10

- I. Based on the SOAR data the Barrow Hill allocation site is **13.51ha** (8.6+1.41+3.5). BD8 area is indicated as 'Employment' on the Barrow Hill allocation masterplan.
- II. The remaining area for residential development is **12.1ha** (13.51-1.41). Following the SOAR data calculation approach (Paragraph 4.4 SOAR) and applying **40%** of site area for infrastructure and landscaping the remaining developable area of Barrow Hill site is **7.26ha** (12.1\*0.6).
- III. Using the SOAR approach (Paragraph 4.4 SOAR) of **30 dwellings/ha** the yield for the Barrow Hill site is **217.8 dwellings** (7.26\*30).

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

- 1) Full area: **10ha**
- 2) Remaining area after 40% set aside for infrastructure and landscaping: **6ha** (10\*0.6)
- 3) Yield for the Bury Road site is **180 dwellings** (0.6\*30)

- 3.1.14 Based on the above it is evident that the capacity of the Barrow Hill site is significantly greater, (**48 units more**) than 170 dwelling. Whilst the Bury Road site sits much closer to the 170 dwellings requirement.
- 3.1.15 **Therefore, we are of the view that the representation of the allocated Barrow Hill site capacity is misrepresented and misleading.**
- 3.1.16 Moreover, the Barrow Hill allocation only provides for 30% affordable housing, whilst the Bury Road development will be proposing 40% affordable which is in line with the WSLP draft Policy NSP29 requirements.
- 3.1.17 Therefore, we are of the opinion that the Parish Council, despite all the evidence and feedback has allocated the Barrow Hill site based on community benefits that no longer exist and because of a connection to the land and landowners; not taking into account the professional evidence base or the local residents preferences.

## 4 Barrow Hill Allocation Proposal Changes

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

### 4.2 First Version

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

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



Figure 1 - Extract of original Barrow Hill proposal

### 4.3 Revised Version

- 4.3.1 The scheme has now changed substantially and been reduced in size, removing the playing fields, reducing the open space and community grounds and benefits; only retaining the indicative for community building and assisted living.
- 4.3.2 We would note that, even though the revised version has retained the indicative community building, it would result in the location of such facility away from the village centre in a more unsustainable location; which is in our opinion would not be utilised as much as the existing Village Hall which is preferred by residents and which Bloor Homes are proposing to commit funds to for its restoration through S106 contributions in consultation with the Parish Council.



Figure 2 - Extract of Revised Barrow Hill proposal (available on the Parish website)

#### 4.4 Allocated Version

- 4.4.1 Lastly, as it is visible in the Reg 14. Draft Neighbourhood Plan, the Barrow Hill allocation by draft policy BCD2 was further reduced, and public benefits, such as new Community Facility and sports facilities/ open space, have been fully omitted.
- 4.4.2 Whilst draft Policy BCD2 point (iv) notes that provision of a suitably located new Care Home should be provided by the proposal the wording of point (iv) allows instead of a Care Home to deliver *‘other identified forms of assisted living accommodation and/or general provision for later living needs, including new bungalows.’*
- 4.4.3 Given the wording of draft Policy BCD2 provides flexibility to potentially not provide the Care Home and only provide general bungalows we are of the view that even the minimal remaining public benefit of the site has the potential to fall away. Meaning that the development would not provide any public benefits and would extend the village to the south with very limited sustainability/accessibility credentials as it stands.
- 4.4.4 Furthermore, the draft Policy BCD2 (i) only requires 30% affordable homes provision, whilst the WSLP draft Policy NSP29 requires 40% affordable provision on greenfield sites of 10 or more dwellings or 0.5 hectares or more. Therefore, it is clear that the allocation of Barrow Hill site would not comply with WSLP.



Figure 3 - Barrow Hill site allocation in the Reg. 14 Draft Neighbourhood Plan (extract)

## 4.5 Summary

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

## 5 Bury Road Public Consultations

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

### 5.2 Summary of Public Consultation

#### February 2023

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

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

5.2.3 A total of 120 stakeholders attended the workshop, including nearly all Barrow Parish Councillors; their Neighbourhood Plan Working Group; and prominent members of a local campaign group, Barrow Ducks. The format of the event corresponded with its central objective: hands on planning to understand local ambitions for growth and community benefits in the context of the required level of new homes being brought forward.

5.2.4 The feedback from the workshop was in general support of the proposed development of the Bury Road site, and it was communicated during the event that the proposal is preferred for development to the Barrow Hill proposal.

5.2.5 As part of the consultation event, the main issues within Barrow were identified as:

- Flooding and drainage issues in the village
- Provision of quality landscaping and public open space in the village is limited
- No community benefits have arisen since new development has taken place previously
- Doctor/healthcare capacity
- Lack of housing for elderly or single people

5.2.6 Whilst the following ideas were proffered by locals:

- Greater healthcare/GP service provision
- Energy efficient new homes
- Changing facilities for the local football club
- Allotments and a village orchard
- Refurbish the village hall
- Widen the footpath and road along Bury Road and Repair pavements
- Improve drainage solutions in the village
- No footpath through Dale Tree Road
- Bungalows built next to the existing bungalows on Dale Tree Road
- Crossing on Bury Road



Figure 4 - Initial Bury Road Proposal (Public Consultation Feb. 2023)

- 5.2.7 Following the consultation event, a 'Consultation event report' was prepared summarising the comments received which was provided for the Paris Council for transparency. Bloor Homes took the comments received on board and incorporated them into the masterplan. Examples of this included the removal of the connection to Dale Tree Road, positioned bungalows next to Dale Tree Road, incorporated significant public open space in the form of multifunctional SUDs feature, also to demonstrate initiative for sustainability the site will be 100% air source heat pumps.
- 5.2.8 Furthermore, Bloor Homes confirmed that S106 legal contributions will be made towards:
- The refurbishment of the Village Hall
  - Provision of changing facilities for the local football club
  - Contribution towards allotments and a village orchard
  - Improvement works to footpath and road along Bury Road and Repair pavements; as well as include crossing on Bury Road.
  - Improve drainage solutions in the village.

### April 2023

- 5.2.9 With regards to the flooding and drainage issues a follow-up near neighbour event was held in April 2023.
- 5.2.10 The flooding issue is the result of a lack of an adequate highway drainage system. To address the issue further drainage assessment with proposed works along Bury Road took place to help mitigate localised flooding.
- 5.2.11 The Bury Road proposals provide a real opportunity in terms of local flood risk prevention and reduction. This can be achieved through installing a new highway drainage system along the entire site frontage.

5.2.12 In the aim of mitigate the identified flooding issue, the updated initial proposals include a combined kerb/drainage system with a positive outfall to the ditch south of Bury Road which would remove water from the road surface (stopping the road acting as a river). Whilst the development of the site itself, will drain through the site rainwater drainage to the proposed large water attenuation basins which will also help reduce the water being directed towards Bury Road.

5.2.13 Therefore, it is considered that the proposal will result in significant benefits for locals and the environment.

### October 2023

5.2.14 In addition to the previous two public consultation events, an additional public consultation event was held on 17<sup>th</sup> October 2023 to present the updated scheme to local residents and demonstrate how Bloor Homes have listened to their concerns and recommendations and how these been implemented in the updated masterplan.

5.2.15 Following the previous consultation event Bloor Homes has revised the masterplan in line with comments received. Such as:

- Proposing to remove the connection to Dale Tree Road
- Positioned bungalows next to Dale Tree Road
- Significant public open space in the form of multifunctional SUDs feature
- The site will be 100% air source heat pumps.
- Secure Park and benches located in the middle of the site for public.



Figure 5 - Updated Bury Road Proposal (Public Consultation Oct. 2023)

- 5.2.16 45 people came to the event, this included key stakeholders such as some councillors from the Parish Council.
- 5.2.17 Most of the feedback forms received were supportive of the proposals and stated in their feedback that they preferred the land south of Bury Road site to Barrow Hill. A few residents stated that they do not want any development to come forward, but felt the site had listened to concerns and comments that were given in February 2023 and that if development should come forward, it needs to be the best scheme possible.
- 5.2.18 The feedback showed that the residents acknowledged and welcomed the inclusion of their previous comments and feedbacks in the scheme. Overall, the public opinion was that the proposed development and Bloor Homes demonstrated a positive collaborative approach and the scheme continued to be the preferred option for the Neighbourhood Plan opposed to the Barrow Hill site.

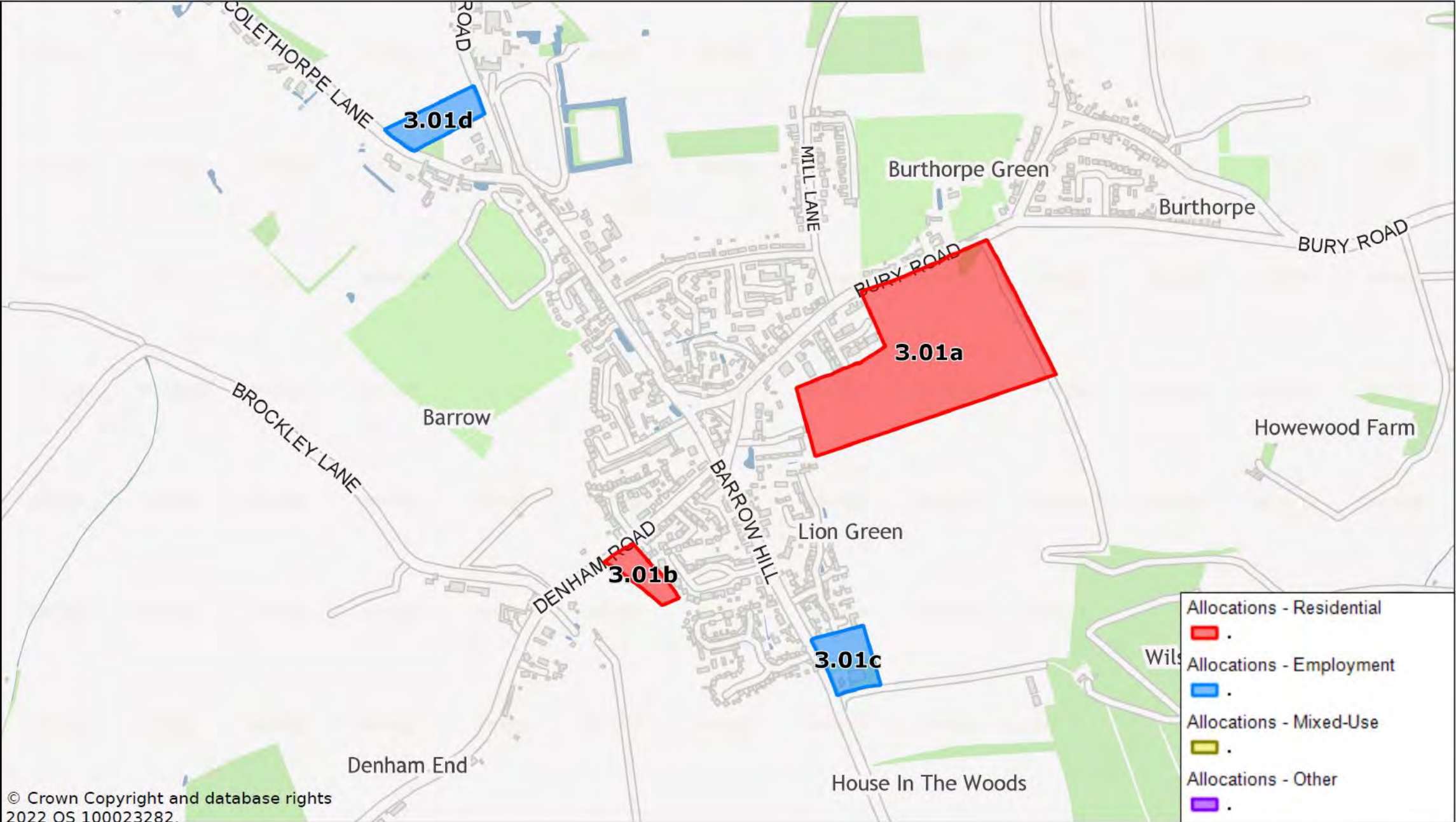
### **5.3 Summary**

- 5.3.1 Bloor Homes have committed to an ongoing, active and continued communication with local residents and the Parish Council. They have demonstrably responded to the feedback received, addressed concerns and progressed the scheme positive and transparently. Since 2021 Bloor Homes have maintained consistent positive refinements to their proposals on the site contrary to the approach of the Barrow Hill proposal as demonstrated in Section 4 of this representation.
- 5.3.2 Furthermore, throughout the number of public consultation events it was continuously confirmed that the local residents are in support of the Bury Road site as opposed to development and allocation at the Barrow Hill site.
- 5.3.3 Therefore, we are of the strong opinion that the Parish Councillors, albite all the evidence and feedback has allocated the Barrow Hill site purely of personal interest and connection to the land and landowners; not taking into account the professional evidence base suggestion or the local residents preference.

## 6 Conclusion

- 6.1.1 Bloor Homes object to the Neighbourhood Plan based on insufficient evidence as well as inconsistency with the Neighbourhood Plans own evidence base and emerging Local Plan in terms of site allocation.
- 6.1.2 Bloor Homes emphasise that the Neighbourhood Plan making process has significantly flawed and lacks credibility, viability and transparency; and the selection of an allocation of the Barrow Hill site lacks of any reliable/trustworthy evidence base.
- 6.1.3 Bloor Homes object to the allocation of Barrow Hill and note that the stated capacity of 170 dwellings on site is much lower than the actual capacity, **217.8 dwellings**, calculated with the location appropriate density (30d/ha) provided by SOAR; therefore the representation of the Barrow Hill site is misleading.
- 6.1.4 Bloor Homes emphasise the fact that the amendments to the Barrow Hill site allocation lacks any significant public benefit which was the main reason why the Parish Council considered it to be a better site than the Bury Road site.
- 6.1.5 Bloor Homes demonstrated continuous and transparent engagement with the local residents and addressed their concerns, comments and suggestions.
- 6.1.6 Bloor Homes would be happy to discuss any of the content of this response with the Neighbourhood Plan team in order to allow the Plan to move forward in a coherent and effective manner.

# Appendix 1      WSLP Draft Allocation



- Allocations - Residential ■
- Allocations - Employment ■
- Allocations - Mixed-Use ■
- Allocations - Other ■

© Crown Copyright and database rights 2022 OS 100023282.

Barrow

Scale: 1:10000

Printed on 2022-04-05 15:50:48

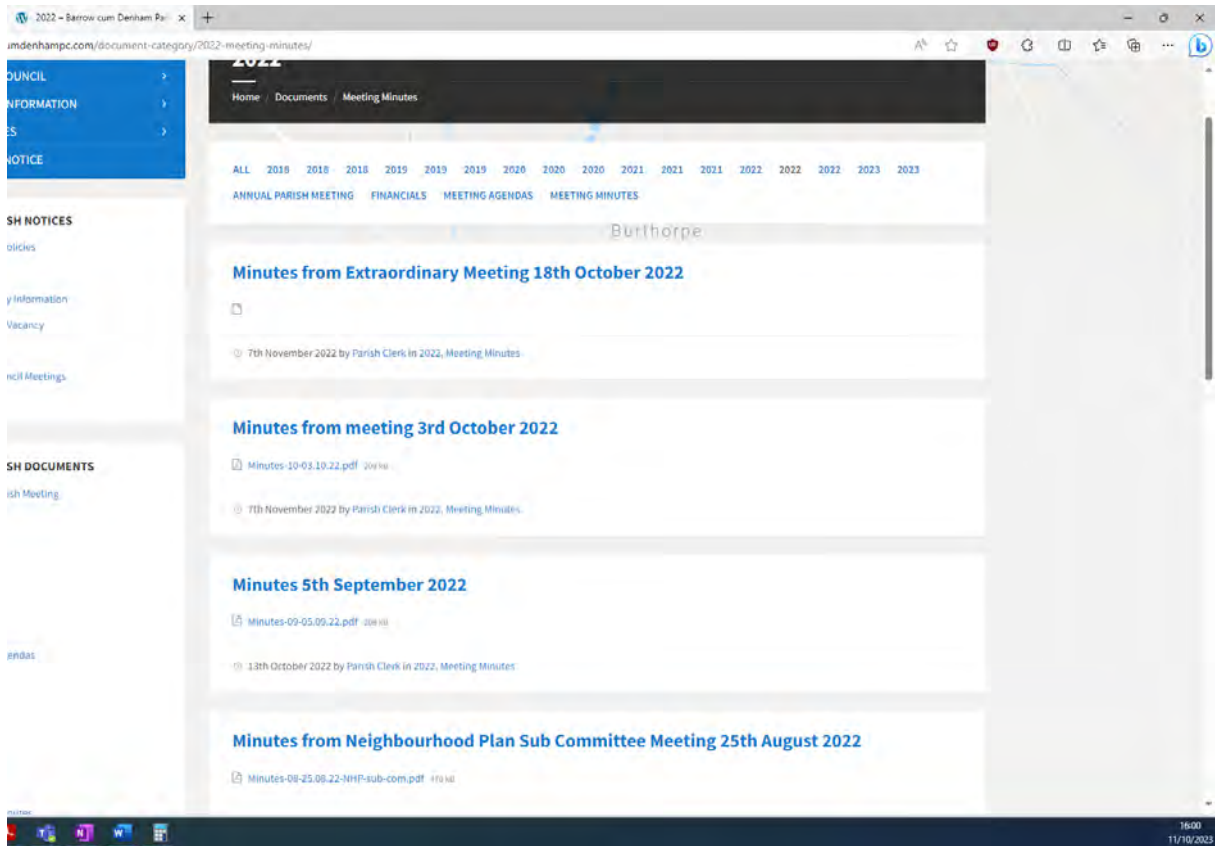
by apointer@SEBC\_DOMAIN

© Crown Copyright and database rights 2022 OS 100023282.



West Suffolk House  
Western Way  
Bury St Edmunds  
IP33 3YU  
01284 763233  
[www.westsuffolk.gov.uk](http://www.westsuffolk.gov.uk)

## Appendix 2 NP Unavailable Meeting Minutes



# Appendix 3 Parish Meeting Minutes 25 Aug 2022

# BARROW cum DENHAM PARISH COUNCIL

## MINUTES OF NEIGHBOURHOOD SUB-COMMITTEE MEETING HELD IN THE COMMITTEE ROOM OF BARROW VILLAGE HALL ON THURSDAY 25<sup>th</sup> AUGUST 2022

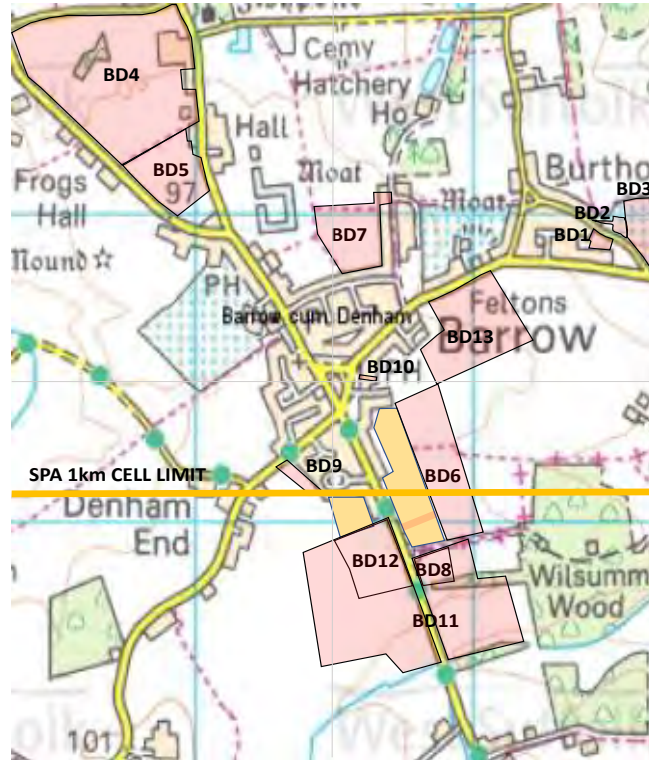
**Present:**

Cllr Kronbergs	Cllr R Rawlings	Cllr Ford
Clerk in attendance: Kat Bowe		

Minute Ref		Action
	Cllr Kronbergs was elected to chair the meeting. All Cllrs in agreement.	
<b>6150</b>	<b>APOLOGIES FOR ABSENCE</b> None	
<b>6151</b>	<b>DECLARATIONS OF INTEREST AND DISPENSATIONS</b> None	
<b>6152</b>	<p><b>PUBLIC FORUM</b></p> <p>There were seven members of the public present.</p> <p>Cllr Kronbergs explained the purpose of the meeting:</p> <ol style="list-style-type: none"> <li>1. To provide a recommendation to the Parish Council of the number of new homes for basing the Neighbourhood Plan (NHP) on</li> <li>2. To provide a recommendation to the Parish Council on the preferred sites.</li> </ol> <p>A representative of the landowner of site BD6 spoke first. He stated that the site was submitted to the WSC call for sites. He believes that development on this site would help to round off the village. The same landowner owns land to the East which could be put forward for biodiversity projects or sports pitches etc. This could prevent further development in that direction. He confirmed the landowner would be happy to enter into a discussion with the Parish Council about potential amenities. He stated that site BD9 would be a tricky site for 20 houses due to how narrow it is and raised concerns about coalescence with Denham. He also raised concerns that site BD13 could be too close to Burthorpe. WSC had expressed concerns about ecology and landscape in relation to site BD6. Since then, a report on the ecology of the site stated that there would be no impact on Wilsummer Wood.</p> <p>There was some confusion over the purpose of the meeting. Cllr Kronbergs restated what the purpose of the meeting was and gave an overview on housing numbers.</p> <p>One resident stated that they live on Bury Road and they hoped that site BD13 would not be chosen.</p> <p>Cllr R Rawlings gave some background on the NHP process and stated that the purpose of the meeting was to agree on a recommendation for the number of houses to be included in the NHP and to put forward a</p>	

	<p>recommendation for the site/sites to be selected for inclusion in the NHP. He confirmed that West Suffolk Council (WSC) are hoping to complete their local plan by July 2024 and that the Parish Council are hoping to complete the NHP well before that. If this happens, WSC must incorporate the NHP into their local plan.</p> <p>Cllr R Rawlings expressed how important it is for the community to support the plan and stated that if the plan is rejected it will not stop development and could result in additional development.</p> <p>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 stated that if the NHP is approved by the Planning Inspectorate and passes the referendum prior to the local plan being completed then the NHP will take precedence over the local plan. WSC's main objective is for 170 houses.</p> <p>WSC was to empower communities and therefore providing the sites put forward are backed with evidence and have community support then WSC will consider these sites.</p> <p>Cllr Kronbergs closed the public forum by stating that if the Parish Council persevered with the number of 77 houses WSC have said that could leave the village open to the 77 plus the 170.</p>	
<p><b>6153</b></p>	<p><b>To agree a recommendation to the Parish Council relating to housing numbers and preferred sites for the Neighbourhood Plan</b></p> <p><u>Housing numbers</u></p> <p>Cllr Kronbergs explained the PC has two choices, to continue working on the 77 dwellings which the NHP has been based on to date or to accept West Suffolk Council's number of 170. Having attended many meetings with WSC and taken advice from consultants it is clear there was no realistic option to reduce the number of houses allocated by WSC.</p> <p>Cllr Kronbergs confirmed than once sites are approved in the local plan there is no mechanism in place to slow down the development and developers/landowners can come forward with their planning applications.</p> <p>To continue with the 77 houses would be met with opposition from WSC and be rejected by the planning inspectorate.</p> <p>It was proposed by Cllr Kronbergs that the recommendation to the full council would be to progress the NHP with a housing number of 170. This was seconded by Cllr R Rawlings. Cllr Ford was also in agreement with the recommendation.</p>	

## Site Selection



WSC has chosen sites BD9 for 20 houses and BD13 for 150 (see map above).

Our own consultants have looked at the proposed sites and RAG rated them. Red, meaning not viable; amber, minor constraints; and green no constraints. The two sites given green status were BD9 and BD10. There is already a planning application for one dwelling on BD10. BD9 was downgraded to amber due to coalescence with Denham. Based on the RAG ratings the preferred site for 77 houses was the reduced, western part of BD13.

The Parish Council asked AECOM to examine five possible options for delivery of the 170 houses proposed by WSC. The options were:

- a) Allocation on BD12 only
- b) Allocation on BD13 only
- c) Allocations between sites BD6, BD8 and BD12
- d) Allocations between sites BD6, BD8, BD9 and BD12
- e) Allocations between sites BD9 and BD13

These options were tested against five criteria – biodiversity and geodiversity; climate change; landscape; historic environment and land, soil and water resources. A scoring system was put in place and points were allocated.

The scores were as follows:

- Option A: 22.5
- Option B: 28.5
- Option C: 23.0
- Option D: 20.0

	<p>Option E: 26.0</p> <p>Based on the above results, option B and option E scored highest. The NHP sub-committee is opposed to siting anything on BD9 due to coalescence and therefore does not favour option E.</p> <p>Discussions in the working party narrowed the choices down to either option B or option C.</p> <p>Cllr R Rawlings stated that he preferred option C due to too many constraints on option B. He raised concerns over the impact this option would have on Dale Tree Road and concerns over the access points on Bury Road and the proximity to Burthorpe. He pointed out that the distance into the village isn't much different from Bury Road or Barrow Hill. Cllr R Rawlings believed that option C offered the best site access and would have less of an impact on residents as a whole. Option C came first in landscape, historic environment, and land, soil and water resources.</p> <p>Cllr Ford agreed that he favoured splitting the development and agreed with the points that Cllr Rawling raised.</p> <p>Cllr Kronbergs stated that his preferred option would be option B. This option scored highly in most areas with the exception of historic environment. Cllr Kronbergs disagreed that coalescence with Burthorpe would be an issue as there are houses further down Bury Road already, past Burthorpe. If the Parish Council chose an option that the consultants put third a good case would need to be put forward with supporting evidence for the decision.</p> <p>By having all the houses on one site there could be more scope for a variety of housing/amenities.</p> <p>Option B is closer to the centre of the village.</p> <p>Cllr Kronbergs stated that he had been in favour of the previous Parish Council's proposal for development further south on Barrow Hill and made reference to the misinformation involved in the campaign against it.</p> <p>In summary, Cllr Kronbergs stated that option C is good but in his opinion option B is better.</p> <p>Cllr Kronbergs proposed that both option B and option C be put forward to the full Parish Council to vote on.</p> <p>Cllr R Rawlings seconded this proposal stating that it would widen the debate. He also mentioned that a previous report had made reference to coalescence between Barrow and Burthorpe, which could strengthen the case to support option C. Cllr Ford agreed that both options should be considered by the full Parish Council.</p>	
6154	<p><b>Date of next Parish Council meeting</b> Monday 5<sup>th</sup> September 2022, in the Committee Room of Barrow Village Hall at 7:15pm</p>	

	The meeting was closed at 7:45pm	
--	----------------------------------	--

Signed: ..... (Chairman) date.....



## **Appendix 4 Parish Meeting Minutes 5 Sep 2022**

# BARROW cum DENHAM PARISH COUNCIL

## MINUTES OF MEETING HELD IN THE COMMITTEE ROOM OF BARROW VILLAGE HALL ON Monday 5<sup>th</sup> September 2022

**Present:**

Cllr Pearson Cllr R Rawlings Cllr T Bragg	Cllr Kronbergs Cllr Cousins Cllr Ford	Cllr Wesley  Clerk in attendance: Kat Bowe
---	---	--

Minute Ref	Action	Action
<b>6155</b>	<b>APOLOGIES FOR ABSENCE</b> Cllr Steer, Cllr Holmes, Cllr K Rawlings	
<b>6156</b>	<b>DECLARATIONS OF INTEREST AND DISPENSATIONS</b> None	
<b>6157</b>	<p><b>PUBLIC FORUM</b> There were 26 members of the public present.</p> <p>One resident raised concerns about the size of the trees outside the Town Estate Room. The trees have grown around the electric cables and could pose a risk during a storm. The Parish Council confirmed quotes would be obtained. Cllr Bragg stated that all the trees along the street need to be looked at.</p> <p>A resident asked about progress with WSC regarding the number of dwellings required. Cllr Kronbergs confirmed the recommendation of the NHP subcommittee was to accept the figure of 170 new dwellings. The committee has come to the conclusion that there is no feasible way to reduce this number. The consultants advised that the plan would be rejected.</p> <p>WSC have changed their approach, WSC need X number of new homes in the district, these homes are then allocated out. There has been an increase of number of homes to be allocated to the local area.</p> <p>The policy to move away from villages has not yet fed through to local councils. With the change in government everything is currently up in the air.</p> <p>One resident stated that the Barrow Protest Group has succeeded in delaying development. Had the protest group have not got involved the houses could have been under development by now and the village would be 160 homes ahead of where it is now.</p> <p>Cllr Pearson drew attention to the site selection process and stated that councillors will have to vote on site selection, the NHP will have to go to referendum. He reminded residents that the NHP will not stop development. If the NHP is voted down the village will be totally exposed.</p>	<b>PW</b>

	<p>IT was confirmed that Barrow Ducks supported the NHP.</p> <p>The NHP is an enormous piece of work which residents will get to vote on.</p> <p>The WSC local plan was due to be adopted in December 2023 but this has been delayed to June 2024. The Parish Council aim to have the NHP adopted ahead of the local plan.</p>	
<b>6158</b>	<p><b>Minutes of the last meeting</b></p> <p>The minutes from the Parish Council meeting on 4<sup>th</sup> July 2022 were circulated prior to the meeting. The minutes were proposed by Cllr R Rawlings and seconded by Cllr Kronbergs with all Councillors in agreement.</p> <p>The minutes from the NHP committee meeting on 25<sup>th</sup> August 2022 were proposed by Cllr R Rawlings and seconded by Cllr Ford with all Councillors in agreement.</p>	
<b>6159</b>	<p><b>COUNTY COUNCIL REPORT</b></p> <p>Cllr Soons gave an overview of her report (available on the website). She encouraged residents to contact her if they have any issues.</p> <p>Cllr Soons was asked about the road between Barrow and Bury. She confirmed the road would be reinstated. The County Council had been paid an enormous sum of money to grant a licence for the works. She is hopeful the County Council will limit any future closures. The plan is to restart the work in a more organised manor. Cllr Pearson asked if Barrow could receive something as compensation for the disruption as many residents have been financially affected by the closures.</p> <p>Clerk to email Cllr Soons for update on work on pavement opposite the Doctors.</p>	<b>Clerk</b>
<b>6160</b>	<p><b>Presentation from Representative(s) of BD13 (Land off Bury Road)6</b></p> <p>A representative from Bloor gave an overview of the company and acknowledged that development is an emotive issue. The land off Bury Road has been identified in the local plan as a preferred site for 150 new homes. Bloor have made representations to WSC who confirmed there were no significant constraints. The Parish Council were given a brochure containing a concept plan (this is available to view, contact the Parish Clerk). Bloor expressed they are keen to engage with the local community.</p> <p>Existing trees and hedge rows will be retained, and additional trees will be planted. Bloor are happy to discuss community facilities, cycle paths, pedestrian links and wish to work with the parish council and incorporate the design guide.</p> <p>A concept master plan is underway which includes enhancing the landscape buffer to avoid coalescence with Burthorpe Green.</p> <p>Houses will have air source heat pumps and electric charging points. The planned density is 32 houses per hectare. There is a plan to include pocket parks within the new development.</p>	

	<p>Cllr Kronbergs asked if access from Bury Road was viable. It was confirmed that the consultants from Highways had no concerns regarding access from Bury Road.</p> <p>Concerns were raised about green spaces. In previous developments the spaces have been unkept. The parish council was assured that nothing is fixed yet, the concept plan is up for discussion and alteration. The landscape would form part of the planning process.</p> <p>It as stated that the Parish Council has been criticised in the past for received very little in community benefits from previous developments. Bloor responded by confirming they had looked at the results of the last consultation and could consider enhancing that current village hall, subsidies for bus services for 20 years, expansion of the school, expansion of the doctors/larger site, upgrading sports facilities or upgrading footpaths. The S106 agreement would be drawn up after consultation with the Parish Council.</p>	
6161	<p><b>Presentation from Representative(s) of BD6, BD8 and BD12 (Land to the East and West of Barrow Hill)</b></p> <p>The representative of the landowners (of the above parcels of land) stated that these landowners have come together to deliver a high quality community focused scheme. A handout was given to the Parish Councillors (this is available to view, contact the clerk).</p> <p>The benefits of the site include employment opportunities, which the Parish Council would be invited to be a trustee of, giving the Parish Council direct involvement ensuring sustainability, community facilities – land for a new community building, formal recreation ground of 5 hectares, the equivalent of 4 football pitches.</p> <p>The proposal includes 170 homes (density 30 homes per hectare) with a mix of affordable housing. The homes will be sustainable and carbon zero. The Parish Council will be invited to be on the design panel. Rights or way and connectivity are very important. Opportunity to improve cycle paths and pedestrian footpaths. Contribution towards bus routes providing viability.</p> <p>Wildlife/ecology and habitat are at the forefront of the proposal. Areas of information green space will be ecology focused. There will be formal areas for recreation.</p> <p>It was stated that this could be a once in a generation opportunity to deliver community benefits to the village as there are three willing local landowners.</p> <p>The Parish Council and residents will be able to have their say on the plans.</p> <p>There will be a mix of homes, affordable/bungalows/opportunities for self builds and a mixed-use scheme for employment including care home and space for start-ups.</p> <p>Willsummer Wood will be protected and expanded. Denham and Burthorpe will retain their character and identity. The proposal includes two access roads of Barrow Hill.</p>	

	<p>The representative was asked if he was confident, they could deliver the houses plus space for amenities and open space. The proposal is for 100 houses to the east and 70 houses to the west. The land allocated for housing meets the needs of 170 homes without encroaching on employment land.</p> <p>Local landowners want any S106 monies ringfenced for the village.</p>	
6162	<p><b>NEIGHBOURHOOD PLAN</b></p> <p>Given the information received regarding the two sites, site selection will be made at a meeting at a later date. The site selection will be made on the merit of the site itself. Cllr Kronbergs proposed holding an extraordinary meeting next Monday with the full council in attendance. Clerk to check councillors' availability.</p> <p>It is important that a decision on the number of houses and the preferred sites is made soon as without this the policies can not be finalised. Once the draft NHP has been completed a Regulation 14 consultation will take place. Once this consultation has been taken on board the NHP is submitted to the Planning Inspectorate. If it is approved the final stage, is the referendum. Everyone on the electoral roll is eligible to vote.</p> <p>The sub committee is recommending the housing number remains at 170.</p>	Clerk
6163	<p><b>Highways</b></p> <p>a) Roadworks - between Westley &amp; Saxham - CR 365755</p> <p>The work on the gas main from Bury to Saxham will resume but will be more adequately resourced. Cllr Pearson proposed that we request a freedom of information request to find out how much money Suffolk Highways was paid for the work. This was seconded by Cllr Wesley.</p>	Clerk
6164	<p><b>DISTRICT COUNCIL REPORT</b></p> <p>Cllr Houlder confirmed the importance of a NHP. It is an important tool to get points across to WSC and to steer the village for the future.</p> <p>Cllr Houlder raised concerns about the cost-of-living crisis and questioned what the government could do to help.</p> <p>The District Council is being very careful with its budget, the impact of the cost of COVID has been huge. There is very little spare money.</p> <p>Cllr Pearson raised concerns about home working. Offices are sitting empty. The clerk raised concerns about the service received, especially from the planning department. Two weeks to reply to emails and phones going straight to voicemail.</p>	
6165	<p><b>To receive the Community Police Report</b></p> <p>See Appendix one for the police report.</p>	
6166	<p><b>Your Police Your Say - public meeting dates announced for 2022</b></p> <p>For information – dates are on the noticeboard</p>	

6167	<p><b>Community infrastructure</b></p> <p>a) Painted Rocks bench This is ongoing, awaiting the engineer's proposal.</p> <p>b) Papeley Meadow Bus Shelter Cllr Pearson to replace pain of glass, cost authorised up to £100 this was proposed by Cllr Wesley and seconded by Cllr Kronbergs</p> <p>c) Fly tipping A report of fly tipping in the village car park. This has been cleared.</p> <p>d) Parking on the Green The Parish Council received a complaint about parking on The Green. Permission had been given for a gravelled area to be used as a turning point. This is now being used regularly for parking cars. Cllr Pearson to speak to the resident. Clerk to re-agenda for October meeting.</p> <p>e) Footpaths – Dog mess There have been increasing reports of dog mess on footpaths. Clerk to order signs. This was proposed by Cllr Ford and seconded by Cllr Wesley.</p> <p>f) 20mph speed limit request There has been a request to introduce a 20mph speed limit in the village. Cllr Pearson did not think Barrow would qualify or fit the criteria. Clerk to email Cllr Soons. Concerns were raised about the attitude of people and policing a change in speed limit.</p>	<p><b>JP</b></p> <p><b>JP</b></p> <p><b>JP Clerk</b></p> <p><b>Clerk</b></p> <p><b>Clerk</b></p>
6168	<p><b>Sports changing facility – S106 Monies</b> The Parish Council are seeking competitive quotes for power. Cllr Wesley to contact Network Power.</p>	<b>PW</b>
6169	<p><b>Simpson Way Open Space</b> The Clerk contacted WSC to arrange a meeting regarding the Grove Park open space. After several phone calls it was established that the open space should be treated as a floral lawn and not a wildflower meadow, meaning it should be cut every six weeks not once a year. The Green has now been cut and will be on a six weekly cutting rota.</p>	
6170	<p><b>Dalham/Denham Confirmation order</b> After a long running dispute, the footpath has been reinstated.</p> <p>Clerk to find out when the new signage will be in place and when it will appear on OS maps.</p>	<b>Clerk</b>
6171	<p><b>Phase Two discretionary Council Tax Rebate Grant</b> For information</p>	
6172	<p><b>Suffolk Wildlife Trust - Consideration of the Natural Environment and Biodiversity in Neighbourhood Plans</b> This is a paid for service, in order for the Parish Council to use it, it would be necessary to find a grant to cover the cost. Cllr Kronbergs to look into it.</p>	<b>ZK</b>

6173	<b>Suffolk Climate Action Community Match Fund</b> Clerk to speak to Village Hall Management Committee to see if they are interested in matched funding for solar panels/charging points.	Clerk																																																																								
6174	<b>West Suffolk Council - Community Chest funding round for 2023-24 is now open</b> An opportunity for community groups to apply for funding for a one-off project. Clerk to ask if the changing facility on the playing field would be considered.	Clerk																																																																								
6175	<b>SALC</b> a) SALC ebulletins For information  b) SALC area forums - September 2022 15 <sup>th</sup> September at 7pm, Cllr Kronbergs to attend.																																																																									
6176	<b>Financial Matters</b>  <b>a) To receive the council's current financial statement</b> Adoption of the Accounts was proposed by Cllr Ford seconded by Cllr R Rawlings with all Councillors in agreement.  <b>b) To confirm payments</b>  <div style="border: 1px dashed black; padding: 5px;"> <p><b>2022/2023 Accounts</b></p> <p><b>EXPENDITURE</b></p> <table border="1" data-bbox="272 1137 1225 1843"> <thead> <tr> <th>Date</th> <th>Payee</th> <th>Amount</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td>BACS – 18/07/2022</td> <td>Verse</td> <td>£340.00</td> <td>Newslink Printing</td> </tr> <tr> <td>BACS – 18/07/2022</td> <td>Mr T Austin</td> <td>£152.00</td> <td>June wages</td> </tr> <tr> <td>DD – 23/7/2022</td> <td>Wave</td> <td>£52.18</td> <td>Allotment water</td> </tr> <tr> <td>BACS – 29/07/2022</td> <td>Kat Bowe</td> <td>£565.00</td> <td>July wages</td> </tr> <tr> <td>BACS – 01/08/2022</td> <td>Mr T Austin</td> <td>£152.00</td> <td>July wages</td> </tr> <tr> <td>BACS – 08/08/2022</td> <td>HMRC</td> <td>£38.00</td> <td>July PAYE/NI</td> </tr> <tr> <td>BACS – 09/08/2022</td> <td>RH Landscapes</td> <td>£708.00</td> <td>June grass cutting</td> </tr> <tr> <td>BACS – 09/08/2022</td> <td>Kat Bowe</td> <td>£157.60</td> <td>Expenses</td> </tr> <tr> <td>BACS – 24/08/2022</td> <td>RH Landscapes</td> <td>£798.00</td> <td>July grass cutting</td> </tr> <tr> <td>BACS – 24/08/2022</td> <td>McGregor Services</td> <td>£462.00</td> <td>July grass cutting</td> </tr> <tr> <td>BACS – 24/08/2022</td> <td>RH Landscapes</td> <td>£708.00</td> <td>May grass cutting (rec'd invoice late)</td> </tr> <tr> <td>BACS – 24/08/2022</td> <td>McGregor Services</td> <td>£570.00</td> <td>June grass cutting</td> </tr> <tr> <td>BACS – 30/08/2022</td> <td>Kat Bowe</td> <td>£565.00</td> <td>August wages</td> </tr> </tbody> </table> <p><b>RECEIPTS</b></p> <table border="1" data-bbox="272 1946 1225 2051"> <thead> <tr> <th>Date</th> <th>Rec'd from</th> <th>Amount</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td>01/08/2022</td> <td>Salvation Army</td> <td>£78.99</td> <td>Recycling credit</td> </tr> <tr> <td>05/08/2022</td> <td></td> <td>£154.00</td> <td>Burial plot??</td> </tr> <tr> <td>24/08/2022</td> <td>F Harris – Fair rent</td> <td>£100.00</td> <td>Fair rent</td> </tr> </tbody> </table> </div>	Date	Payee	Amount	Notes	BACS – 18/07/2022	Verse	£340.00	Newslink Printing	BACS – 18/07/2022	Mr T Austin	£152.00	June wages	DD – 23/7/2022	Wave	£52.18	Allotment water	BACS – 29/07/2022	Kat Bowe	£565.00	July wages	BACS – 01/08/2022	Mr T Austin	£152.00	July wages	BACS – 08/08/2022	HMRC	£38.00	July PAYE/NI	BACS – 09/08/2022	RH Landscapes	£708.00	June grass cutting	BACS – 09/08/2022	Kat Bowe	£157.60	Expenses	BACS – 24/08/2022	RH Landscapes	£798.00	July grass cutting	BACS – 24/08/2022	McGregor Services	£462.00	July grass cutting	BACS – 24/08/2022	RH Landscapes	£708.00	May grass cutting (rec'd invoice late)	BACS – 24/08/2022	McGregor Services	£570.00	June grass cutting	BACS – 30/08/2022	Kat Bowe	£565.00	August wages	Date	Rec'd from	Amount	Notes	01/08/2022	Salvation Army	£78.99	Recycling credit	05/08/2022		£154.00	Burial plot??	24/08/2022	F Harris – Fair rent	£100.00	Fair rent	
Date	Payee	Amount	Notes																																																																							
BACS – 18/07/2022	Verse	£340.00	Newslink Printing																																																																							
BACS – 18/07/2022	Mr T Austin	£152.00	June wages																																																																							
DD – 23/7/2022	Wave	£52.18	Allotment water																																																																							
BACS – 29/07/2022	Kat Bowe	£565.00	July wages																																																																							
BACS – 01/08/2022	Mr T Austin	£152.00	July wages																																																																							
BACS – 08/08/2022	HMRC	£38.00	July PAYE/NI																																																																							
BACS – 09/08/2022	RH Landscapes	£708.00	June grass cutting																																																																							
BACS – 09/08/2022	Kat Bowe	£157.60	Expenses																																																																							
BACS – 24/08/2022	RH Landscapes	£798.00	July grass cutting																																																																							
BACS – 24/08/2022	McGregor Services	£462.00	July grass cutting																																																																							
BACS – 24/08/2022	RH Landscapes	£708.00	May grass cutting (rec'd invoice late)																																																																							
BACS – 24/08/2022	McGregor Services	£570.00	June grass cutting																																																																							
BACS – 30/08/2022	Kat Bowe	£565.00	August wages																																																																							
Date	Rec'd from	Amount	Notes																																																																							
01/08/2022	Salvation Army	£78.99	Recycling credit																																																																							
05/08/2022		£154.00	Burial plot??																																																																							
24/08/2022	F Harris – Fair rent	£100.00	Fair rent																																																																							

	<p>The payments were proposed by Cllr Wesley and seconded by Cllr Cousins</p> <p>c) To approve invoices</p> <p>McGregor Services £380 Hammond Ford £297.50</p> <p>The above invoices were approved. They were proposed by Cllr Cousins and seconded by Cllr Wesley</p>	
6177	<p><b>PLANNING</b></p> <p><b>Ref Location Application Details</b></p> <p><b>DC/22/0757/HH Highfields 9 Mill Lane Barrow Suffolk IP29 5BS</b> <b>Householder planning application - part two storey, part single storey rear extensions (following demolition of conservatory)</b></p> <p>No Objection</p> <p><b>DC/22/1348/HH 3 Stoney Lane Barrow Suffolk IP29 5DD</b> <b>Householder planning application - a. installation of one window to ground floor front elevation b. single storey rear extension c. first floor rear extension above dining room. d. first floor rear extension over utility</b></p> <p>No Objection</p> <p><b>DC/22/1390/LB The Gables 19 Bury Road Barrow IP29 5AE</b> <b>Application for listed building consent - single storey side extension with weatherboarding cladding to match existing dwelling</b></p> <p>No Objection</p>	
6178	<p><b>To note the following planning determinations</b></p> <p><b>DC/21/2279/FUL Land Adjacent 16 The Green Barrow Suffolk</b> Planning application - a. two dwellings; b. creation of windows within boundary walls; c. widening of existing access and d. associated parking (following demolition of outbuilding and swimming pool - Approved</p> <p><b>DC/21/2280/LB Land Adjacent 16 The Green Barrow Suffolk</b> Application for listed building consent - a. two dwellings (following demolition of outbuilding and swimming pool); b. creation of windows within boundary walls – Approved</p>	
6179	<p><b>Planning application circulated during August; no objections received from councillors</b></p> <p><b>DC/22/1159/HH 16 Simpson Way Barrow Suffolk IP29 5EA</b> <b>Householder planning application - single storey rear extension</b></p> <p>For information</p>	

<b>6180</b>	<b>DATE OF NEXT MEETING</b> 3 <sup>rd</sup> October 2022 in the Committee Room of Barrow Village Hall at 7:15pm.  The meeting was closed 9:20pm	
-------------	--	--

Signed: ..... (Chairman) date.....

## APPENDIX ONE

### COMMUNITY POLICE REPORT – SEPTEMBER '22 MESSAGES

There were no messages from the Police to cascade this month.

**REPORTED CRIME FOR THE MONTH OF MAY '22 – Total number = 3**

**Violence & Sexual = 1**

**Anti - Social Behaviour = 1**

**Other Theft = 1**

CATEGORY	LOCATION	TIMELINE/ACTION
Other Theft	On or near Poplar Close	Under Investigation
Anti – Social Behaviour	On or near Johnson Rd	No crime line data
Violence & Sexual	On or Near Cedar Road	Unable to prosecute suspect

**REPORTED CRIME FOR THE MONTH OF JUNE '22 – Total number = 5**

CATEGORY	LOCATION	TIMELINE/ACTION
Criminal Damage/Arson	On or near Cedar Road	Under investigation
Violence & Sexual	On or near Cedar Road	Under investigation
Public Order Offence	On or near Cedar Road	Under investigation
Other theft	On or near Premier Store	Under Investigation
Violence & Sexual	On or near Barrow Hill	Under investigation

### Figures for July 2022 – not yet published

**Speeding Bury Road** – I have received complaints from residents of speeding down Bury Road (before/after Papley Meadow where Community Speed Watch normally conduct their checks). A request was made for a Police Speed check be conducted. I have contacted our Community Police Officer and am awaiting a response.

In addition, it was reported that motor cyclists are speeding up and down the road late at night. As there are no details have suggested that dates and times should be recorded and then reported as ASB. I have mentioned this to the Community Police Officer.

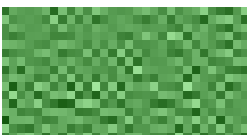

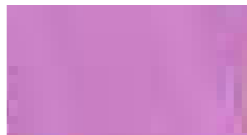






Ralph Rawlings  
4<sup>th</sup> September 2022

# Appendix 5 Barrow Hill Revised Proposal 2

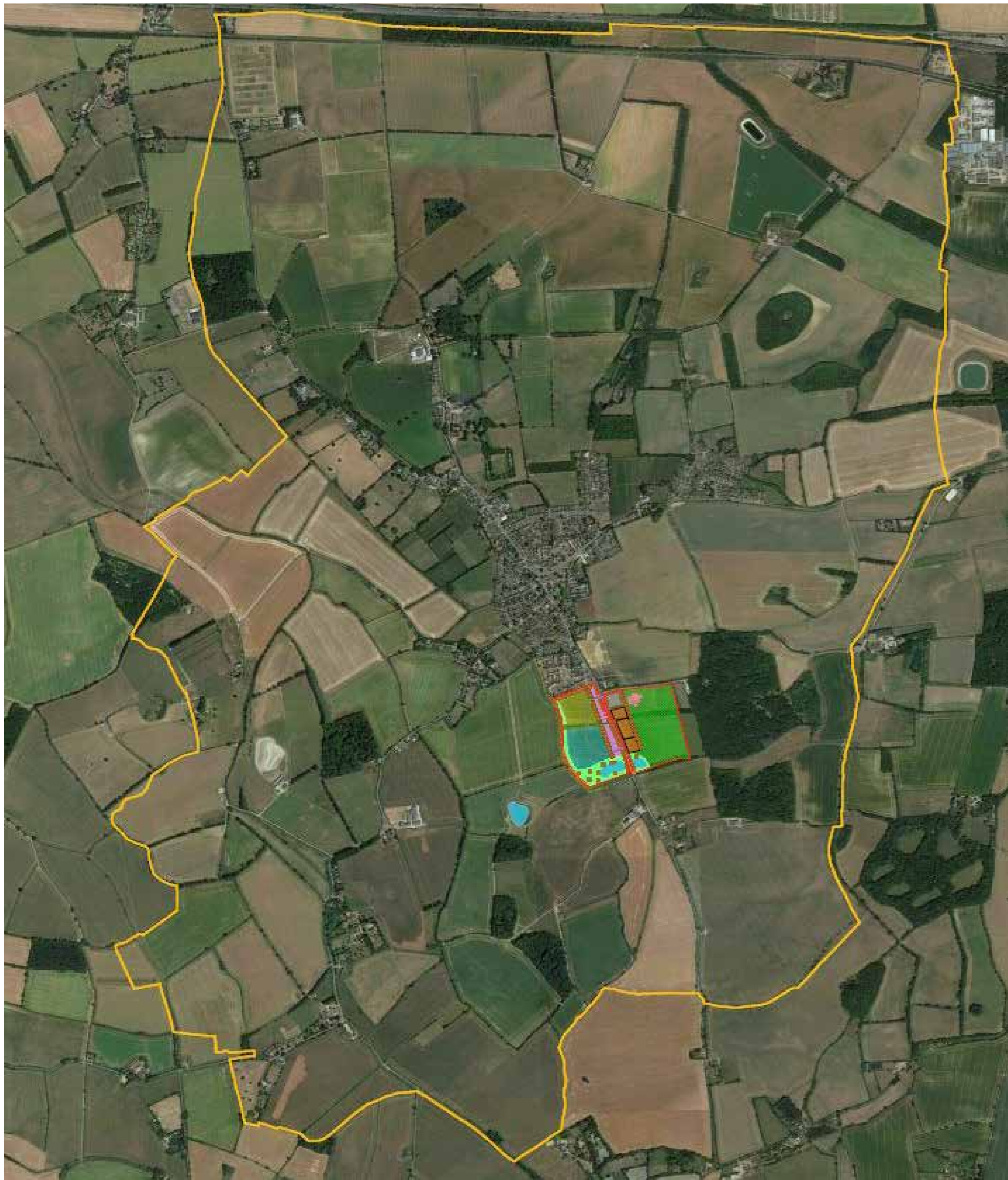
# Revised proposal



## KEY

	1 Landscape enhancement		4 Recreation area		7 Self build / Custom build
	2 Care Home / Assisted Living		5 New Homes		8 Car park
	3 Community Building		6 Mixed use		9 Access

# Benefits to the community



Along with the list of benefits highlighted below, experience from the recent exhibition and responses provided have outlined an ambition to principally see the delivery of:

- Sports facilities including contemporary community accommodation;
- Improvements to the Primary School;
- Genuinely affordable housing;
- A mix of new homes for all generations;
- Self-build opportunities;
- Improvement to footpath linkage to village; and
- A mix of employment uses, including a Care Home, to provide sustainable working opportunities for Barrow.

- Provision of land for extensive recreational facilities including sports pitches and informal open space as well as expansion capacity for further facilities as required;
- Provision of land for a new Community Building and associated parking to replace the existing Village Hall;
- Recreation ground donated on a long leasehold basis along with financial contributions to facilities;
- Gettable housing / new homes of mixed tenure, type and smaller sizes, including affordable homes, self/custom build and a Care Home / Assisted Living, to meet local needs, within a high-quality landscape setting;
- An opportunity to explore the Parish Council's direct involvement in the delivery of Gettable / Affordable Housing to the village;
- Substantial landscaping including provision of woodland belts to sustain the identity of the village and to enhance the biodiversity of the area;

- Provision of a cycleway to the village;
- Provide a high-quality entrance to the village;
- Provision of a Care Home / Assisted Living to meet the needs of an aging population;
- Employment (mixed-use) land to facilitate sustainable working options within the village;
- Contributions to improved health facilities;
- An increased customer base for existing shops, services and community facilities;
- Provision of Sustainable Urban Drainage (SUDS) to manage surface water from the proposed scheme;
- Improvements to the village primary school by way of a financial contribution from the proposed scheme (ring fenced to Barrow Primary School); and
- Potential traffic calming measures by way of a financial contribution from the proposed scheme.