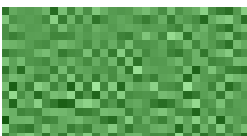
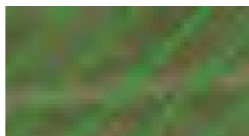
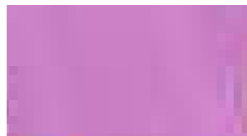


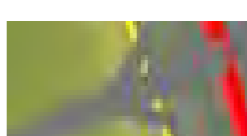




Revised proposal 2



KEY

- | | | | | | |
|--|-------------------------|---|-------------------|---|-----------------------------|
|  | 1 Landscape enhancement |  | 4 Recreation area |  | 7 Self build / Custom build |
|  | 2 Community Building |  | 5 New Homes |  | 8 Access |
|  | 3 Car Park |  | 6 Future Phase | | |

1/6

PC62



Objection to the Parish Council's Neighbourhood Plan

1 message



24 October 2023 at 16:54

Dear Ms Chilton,

Please find attached my strong objection to the Parish Council's proposed Neighbourhood Plan, specifically the preferred development site (Barrow Hill). As attachments cannot be included in the portal, please include the attached document with all of the rest of the Neighbourhood Plan comments submitted during the Public Consultation period. Please also submit it to the Inspector as per due process.

With thanks and kind regards,



Barrow resident



Objections to PC NP 24 Oct 2023.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 3rd place, with a score of 23. Following an exchange of Councillors' views, in the same meeting, and in the 'Extraordinary Meeting' dated 18/10/22, the PC voted in favour of site C, a vote which I believe doesn't seem to be evidence-based but follows a discussion of personal opinions and preferences.

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 x 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 Councillor's 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."

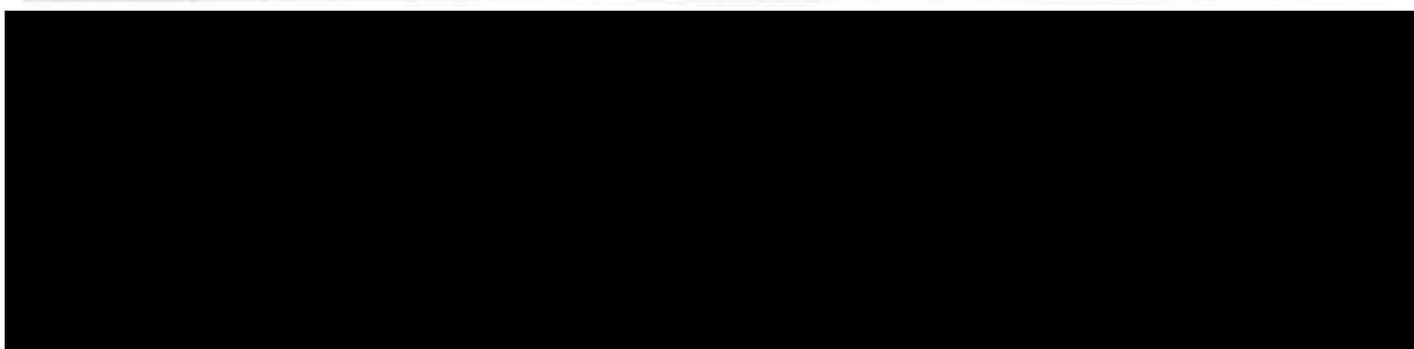
Site selection – Denham Lane

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.



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

1 message



Dear Sirs,

On behalf of our client, Fleur-Hill, and to attached our response to the Barrow-cum-Denham Neighbourhood Plan consultation, for your consideration. I have also included our Vision Document for Land between Colethorpe Lane and Church Road, Barrow, two notes on education provision at the primary school, and a short letter summarising the key benefits to the village that could be delivery by our site.

I have already submitted the attached documents to the Parish Clerk but thought it would be useful to send to you all for completeness.

If you have any questions or require any further information, please do not hesitate to reach out to me.

We would very much welcome the opportunity to discuss the site and the benefits it can deliver with you all.

Kind regards



Associate Director

Strutt & Parker

66-68 Hills Road

Cambridge, CB2 1LA

Direct: 01223 459437 | Mobile: 07717 512 146





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5 attachments

-  **Barrow Reg 14 NP reps Oct23.pdf**
664K
-  **EFM report Barrow Primary School 27.09.23.pdf**
765K
-  **EFM Report - Barrow Primary School 19.07.22.pdf**
273K
-  **Barrow Vision Proposal_Neighbourhood Plan.pdf**
1649K
-  **24.10.23 - Letter to Barrow Parish Councillors.pdf**
214K

PC 63



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

Prepared by 

October 2023

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

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1. INTRODUCTION

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

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

2. SITE BACKGROUND

Site and Surroundings

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

Planning and Promotion History

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

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

Policy Context

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

3. THE PROPOSALS

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

Land for Education

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

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

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

Land for employment

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

Transport and Access

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

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

Landscape

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

Heritage

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

Open space

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

4. RESPONSE TO THE DRAFT NEIGHBOURHOOD PLAN

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Existing Settlement Character

- 4.21 This Chapter of the Neighbourhood Plan provides a summary of the existing settlement, including its built heritage.
- 4.22 It notes at paragraph 3.4 that *"There is also a Scheduled Ancient Monument (SAM) to the north of the village (a moated site and associated fishpond) to the south east of Barrow Hall, which is a fundamental constraint to any further growth to the north of the village."*
- 4.23 Whilst the historic importance of this site is and should be recognised, this should not be seen as a fundamental constraint to growth in the north of the village.

Policy BCD1 – The Spatial Planning Strategy

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

Policy BCD2 – Strategic Allocation: Land at Barrow Hill

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

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

Policy BCD5 – Development and High Quality Design

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

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

Policy BCD7 – Local Employment Strategy

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

Policy BCD8 – Support for New and Existing Community Facilities

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

Policy BCD10 - Ecology and the Natural Environment

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

Policy BCD11 – Protection of Local Heritage Assets

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

Policy BCD12 – Active Transport and Accessibility

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

5. CONCLUSION

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

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



Response the Neighbourhood plan consultation

1 message

24 October 2023 at 23:04



To the Parish Council

Please find attach our response to the Public consultation on the Neighbourhood Plan

Kind regards



Response to Regulation 14 Public Consultation Barrow.docx

16K

Response to Regulation 14 Public Consultation Barrow-cum-Denham Parish Council Neighbourhood Plan

We welcome the opportunity to comment on this document and proposal and wish to object in the strongest terms to this Neighbourhood Plan.

Our major objection is concerned with the Parish Council's selection of sites.

We were pleased to be able to participate in the 2020 Neighbourhood Plan questionnaire that was made available to many residents of the Parish and welcomed the fact that parishioners were given the opportunity to 'have your say' and shape the future of our respective villages.

Of the 4 sites put forward in this questionnaire, there was overwhelming support (54.7%) for the Colethorpe Lane site, and it was noted that 81.7% of residents did not vote for the Barrow Hill site. This was not hugely surprising since the brunt of new housing over recent years had taken place on the south side of Barrow (to the East and West of Barrow Hill).

The benefits of choosing the Colethorpe Lane site include the 'gifting' of a significant amount of land to the school and a development that is nearer the main transport link which would minimise traffic through the village. Even if a conservative estimate of 1.5 cars per household is used, this would result in a near increase of 300 cars travelling on the roads around Barrow. Developing the Colethorpe Lane site would inevitably take much of the traffic directly to the A14 resulting in less 'clogging up' of the roads through Barrow village.

We were very surprised to see this site excluded from the short list and we believe the reasons promulgated for this exclusion, i.e. that it doesn't adjoin the settlement boundary, to be rather dubious. We believe the site to be located either within or adjacent to the bounds of the actual settlement. I have not seen nor heard any evidence that the Parish Council has made suitable representations to the West Suffolk Council regarding the Colethorpe Lane site.

In short, there seems to have been a complete disregard for the residents' choice of sites for reasons that remain entirely unclear to us.

Following the exclusion of the village residents' preferred site (Colethorpe Lane), the summary of the report from AECOM (commissioned by the Parish Council) recorded in the PC minutes of 25 August 2022, showed that the Bury Road site was the preferred choice of the residents, and that the Barrow Hill site was 3rd choice of 5. However, the members of the Parish Council inexplicably voted for the Barrow Hill site.

All of this suggest that residents' opinions were mostly ignored, and the members of the Parish Council took a very important and far-reaching decision against any evidence-base and with disregard for the views of the people that it is supposed to represent. This is extremely disappointing and raises questions about objectivity vs personal preference.

We have real concerns about the choice of the Barrow Hill site. The designated site is far larger than is needed for the number of dwellings required by the West Suffolk Council's housing allocation. We understand that the number recommended is 170. This area is able to accommodate more than 400 dwellings according to the national home density figures. Despite any assurances given, it is inevitable that there will be far more than 170 dwellings built on the site.

Finally, we remain very concerned about the inevitable increase in surface water which has got much worse since the previous developments were built on the land surrounding Barrow Hill. We raised this as a major concern to both the Parish Council and the Planning department of the West Suffolk Council at that time and despite assurances that water will naturally drain away from the road, this has proven not to be totally the case. The planning department failed to hold the developers to account for this increase in flood water. The pavements are inadequate, and water is regularly lying on the pavements in addition to the driveways of householders along Barrow Hill. The surface water and foul drain systems are inadequate and were never intended to deal with the volumes seen now.

We have been led to believe by others that key stakeholders in the village, namely the Doctor's surgery and the school have not been engaged with. Considering the importance of the school to the village, and the possibility of acquiring additional land to enable much-needed expansion, should this be true then we find this to be very concerning.

In summary, we strongly object to the decisions taken by the Parish Council and suggest that evidence from the Parish Council's own commissioned report has been disregarded to the detriment of the village infrastructure and the residents for whom the Parish Council is there to represent.



Barrow cum Denham

Neighbourhood Plan

Representations

DRAFT



Please see below representations to each policy in the Draft Neighbourhood Plan.

POLICY BCD1 – The Spatial Planning Strategy

In the period 2019 to 2041 the Neighbourhood Plan area will accommodate new strategic development in accordance with the designation of Barrow as a Key Service Centre in the Local Plan settlement hierarchy. With the exception of the strategic, mixed-use, site allocation at Barrow Hill, set out under Policy BCD2, or proposals for new sport and recreational infrastructure, set out under Policy BCD9, all additional new windfall development will be primarily focused within the defined Village Settlement Boundary of Barrow.

Outside of the Settlement Boundaries, priority will be given to protecting and enhancing the surrounding countryside from inappropriate forms of development. New development proposals will only be supported where:

- i. It is essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other exceptional uses for which it can satisfactorily be demonstrated that it needs to be located in the countryside;

Support.

- ii. It would not have significant adverse impact on the landscape setting of either Barrow, Denham or Burthorpe.

Support.

- iii. It would not result in the coalescence, loss, or erosion of existing settlement gaps between Barrow, Burthorpe and Denham.

Particularly support.

- iv. It would maintain the distinctive views of the surrounding countryside from public vantage points within, and adjacent to, the built-up area of Barrow, Burthorpe and Denham.

Support.

- v. **Proposals for the conversion of redundant or disused rural buildings, meet the criteria set out in Policy BCD3 of this Plan.**

Support (subject to comments regarding Policy BCD3).

- vi. **Development would meet the limited rural exceptions criteria, for special needs or local affordable housing, set out in Policy BCD4 of this Plan.**

Particularly support (subject to comments regarding policy BCD4).

POLICY BCD3 – Non Strategic Housing Delivery

In the period 2019 to 2041 the Neighbourhood Plan area will primarily accommodate new housing delivery at Barrow Hill, as identified under Policy BCD2 of this Plan.

In addition to the strategic site allocation, this Plan provides for small infill, or other brownfield redevelopments, to come forward for new homes, on suitable sites, within the defined village Settlement Boundaries of Barrow and Burthorpe. Such developments will be judged on their merits and will be expected to meet all of the following relevant development criteria:

- i. **New infill development will not normally be expected to exceed 5 additional new homes. However higher infill numbers may be appropriate in some locations, where justified by the available capacity of the site and the resultant contribution of the proposed development to the character of the area.**

Support – although it would be helpful within the policy to add that the new infill development should also, where applicable, respect the density of the surrounding housing.

- ii. **New development proposals should be of a suitable scale and high quality design, appropriate to their particular location and/or street scene and should maintain or enhance local village character.**

Support.

- iii. **New development should not have any significant adverse impacts upon the existing amenities of neighbouring residents, by reason of scale, design or building proximity.**

Support.

- iv. **Where existing, buildings are proposed to be converted or demolished, which currently, or have previously accommodated local business or community uses, proposals must also satisfy the relevant requirements of Policies BCD7 and BCD8 of this Plan.**

Support (subject to comments regarding policies BCD7 and BCD8).

- v. **Where older buildings are converted from other uses, they should retain, and where possible, restore any existing historic building features.**

Support – although it would be helpful within the policy to add that this would be subject to the economic viability of the works proposed and the status of the building.

- vi. **New development proposals should seek to retain all existing healthy trees and hedgerows, wherever possible, or provide compensatory planting where the removal of any trees and/or hedgerows is unavoidable.**

Support – although it would be helpful within the policy to acknowledge that any compensatory planting would be subject to the availability of appropriate space within the scheme.

Proposals for the conversion of redundant or disused rural buildings, for residential use outside of the defined Settlement Boundaries of Barrow and Burthorpe, may also be supported in principle, where they meet all of the following criteria:

- a. **The building is structurally sound and capable of residential conversion without the need for significant reconstruction, major extension or any other major alteration to facilitate the new use;**

Support – although it would be helpful within the policy to state what the Neighbourhood Plan considers to be a ‘major extension’.

- b. **The conversion scheme is based on high-quality design principles and the use of appropriate, sustainable building materials, which largely retains the existing character and any historic interest of the building;**

Support – although it would be helpful within the policy to add that this would be subject to the economic viability of the works proposed and the status of the building.

- c. **The proposal would enhance the setting of the building, through the sensitive creation of a new residential curtilage which would not harm the character of the site or the building, or any other neighbouring rural buildings in the immediate surrounding area.**

Support – although it would be helpful within the policy to outline what is anticipated to be a harm to neighbouring rural buildings in the immediate surrounding area.

All other development, outside of the defined Settlement Boundaries of Barrow and Burthorpe, will not be supported, unless it is in accordance with the exceptions criteria set out in Policy BCD4 of this Plan.

POLICY BCD4 – Special Needs and Local Affordable Housing

New housing within the Neighbourhood Plan area, during the Plan period, will primarily be delivered in accordance with Policies BCD2 and BCD3. Where justified, identified special housing needs, that cannot be provided within the existing built up areas, including small scale, local, affordable housing needs, will also be supported, where they accord with this Policy.

New development proposals to meet special housing needs, including accommodation for the elderly and/or vulnerable groups, outside of the Settlement Boundaries of Barrow and Burthorpe, will be considered on their individual merits, subject to meeting the following relevant criteria. Proposals for small scale, local, rural affordable housing proposals, will also be supported where they meet all the following relevant criteria:

- i. **New development proposals to accommodate the needs of elderly and/or vulnerable people should demonstrate evidence of local need, from within the Neighbourhood Plan area, or adjoining Parishes, that cannot be reasonably met on a suitable, alternative, non-rural, site.**

Support – although it would be helpful within the policy to outline what is anticipated to be a suitable, alternative, non-rural, site.

It would also be helpful within the policy to acknowledge the needs of those with a connection to the parish but who currently live beyond the neighbouring parishes.

- ii. **New development proposals for small scale local rural affordable housing, should demonstrate evidence of local need, from within the Neighbourhood Plan Area, or adjoining Parishes, that cannot be reasonably met within the Settlement Boundaries, as shown on the Proposals Map.**

Support – although it would also be helpful within the policy to acknowledge the needs of those with a connection to the parish but who currently live beyond the neighbouring parishes.

- iii. **New development proposals for small scale local affordable housing should be appropriate in terms of scale and character to their rural location. Such developments will normally be expected to make 100% of the new homes available for either affordable purchase or rent, including the delivery of First Homes, in accordance with the Annex 2 definitions set out in the NPPF.**

Support.

- iv. **Where specifically justified and to ensure viable delivery, a small percentage of market housing may be permissible, to help facilitate appropriate affordable schemes, in accordance with the relevant guidance contained within the NPPF.**

Support – although it would be helpful within the policy to state what is meant by ‘a small percentage’.

- v. **All new development proposals should be of an appropriate scale and design, consistent with the rural character of their location and should demonstrate high standards of amenity space, sustainable design and construction.**

Support – although it would be helpful within the policy to outline what is anticipated to be high standards of amenity space, sustainable design and construction.

- vi. **All new development proposals permitted under this policy, should demonstrate that they are well related to local services and can be accessed by sustainable transport modes.**

Support – although it would be helpful within the policy to outline what is anticipated to be well related to local services and can be accessed by sustainable transport modes.

- vii. **New development proposals must not erode the existing settlement gaps between Barrow, Burthorpe and Denham or have any significant visual impact upon the surrounding countryside.**

Particularly support.

POLICY BCD5 – Development and High Quality Design

Proposals for new housing should demonstrate high standards of design and be of an appropriate gross internal floor area to satisfy prevailing Nationally Described Space Standards.

The layout of new housing should not be road or parking dominated and should reflect the settlement pattern of the area, with high levels of pedestrian permeability. Proposals for affordable housing within developments must be fully integrated into the overall layout.

New homes should not normally exceed two storeys, unless it can be demonstrated that there will be no impact upon the amenities of adjacent occupiers. Single storey homes to meet special, or later living needs, will be particularly supported. In addition, all proposals for new homes should:

- i. **Provide a good mix of new housing, which prioritises 2 and 3 bedroom homes.**

Support – although it would be helpful within the policy to acknowledge that prioritising 2 and 3 bedroom homes will need to be the subject of regular review to ensure continued relevance i.e. should demand or need change over the course of the Neighbourhood Plan period.

- ii. **Have full regard to the rural character of the development site location and seek to preserve or enhance that character.**

Support – although it would be helpful within the policy to acknowledge the change, that the delivery of growth to the village includes, is an inevitable consequence and will have an impact on the character of parts of the village.

- iii. **Provide separation distances and proportionate private garden sizes which provide for an appropriate level of outdoor amenity for occupiers.**

Support – although it would be helpful within the policy to outline what is anticipated to be acceptable separation distances/proportionate private garden sizes.

- iv. **Deliver a percentage of the scheme as accessible and adaptable new homes in accordance with the definitions set out in prevailing Building Regulations.**

Particularly support.

POLICY BCD6 – Sustainable Design and Construction

Proposals for new development should demonstrate high standards of sustainability and incorporate current best practice in energy conservation. All new buildings will be expected to incorporate sustainable design, construction and energy efficiency measures, including where feasible, the use of energy efficiency technologies.

All buildings will be expected to meet the following relevant criteria:

- i. **Energy efficiency technologies should be designed to be integral to the design of the building, to minimise any impact on the external appearance of the building, or the rural character of the area.**

Support – although it would be helpful within the policy to acknowledge the requirements of building regulations, both now and the revisions currently planned.

- ii. **All new buildings should make suitable provision for sustainable waste management (including waste separation and minimisation) and include grey and surface water harvesting, where technically feasible.**

Support – although it would be helpful within the policy to acknowledge the requirements of building regulations, both now and the revisions currently planned.

- iii. **All new buildings must make adequate provision for the covered storage of cycles and e-bikes in accordance with adopted cycle parking standards.**

Support – although it would be helpful within the policy to acknowledge that this would not be feasible for all new homes.

- iv. **All new buildings should provide appropriate levels of electric vehicle charging infrastructure in accordance with adopted car parking standards.**

Particularly support.

- v. **Proposals for new housing should make adequate provision for home working, proportional to the scale of the new home and provide infrastructure to accommodate future upgrades in broadband.**

Support – although it would be helpful within the policy to acknowledge that not all new homes require home working provision because main sources of employment cannot be undertaken from home.

POLICY BCD7 – Local Employment Strategy

- i. **In the period 2019 – 2041 this Plan will encourage and support the viability and retention of existing small businesses in the Neighbourhood Plan area. This Plan will also support further small to medium scale new business creation in appropriate and sustainable locations.**

Particularly support.

- ii. **All existing employment generating uses and land designated for future employment use, will be safeguarded in principle with a presumption against the loss of employment land and premises, in accordance with Policy DM30 of the Joint Development Management Policies Local Plan document (2015) .**

Particularly support.

- iii. **Suitable development proposals brought forward on previously allocated employment sites, designated by Rural Vision 2031 policies RV4 and RV10, will continue to be supported and encouraged, where the employment uses proposed are appropriate to a rural area and compatible with nearby residential amenity.**

Particularly support.

- iv. **New employment provision referenced under criterion v of Policy BCD2 of this Plan (Land at Barrow Hill) will be encouraged to provide office space to support new business startups and provide opportunities for remote working, as part of the overall allocation.**

Support – although it would be helpful within the policy to acknowledge the variations in the requirement of office space by new business startups.

- v. **Other forms of light employment, falling under the broader Class E definition of the 2021 Use Classes Order, will also be favourably considered on the BCD2 allocation site at Barrow Hill, to encourage investment, by allowing a broad spectrum of employment generating uses to come forward, compatible with a rural, residential area.**

Support – although it would be helpful within the policy to acknowledge that different employment types will need to appropriately complement one another to provide robust foundations for sustained employment provision in the village.

- vi. **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.**

Object – a higher bar should be applied to provide a robust context for sustained employment provision in the village.

- vii. **The Council will continue to generally support remote working, whether within existing buildings, or via the provision of appropriately scaled and designed extensions to existing residential properties, to provide a home office. The Council will also continue to support the delivery of new and upgraded infrastructure to help further support remote working.**

Support – although it would be helpful within the policy to acknowledge that home working accommodation is often provided by separate buildings within gardens.

POLICY BCD8 – Support for New and Existing Community Facilities

Proposals for new or expanded community services and facilities will be supported in principle, subject to meeting all applicable development management criteria. All other development proposals should demonstrate how they support the maintenance of existing community facilities. Where new facilities are proposed, they should complement and enhance existing provision and be located so as to maximise co-location and accessibility by non-car modes.

The provision of the following additional community facilities will be particularly supported:

- **Improved IT provision**
- **Improved post office facilities, local and farm shops**
- **Additional social / meeting places**
- **Expansion of the existing primary school and preschool facilities, where expanded facilities are available to the wider community**
- **The provision of enhanced school drop-off/pickup facilities**
- **New and improved sporting and leisure facilities**
- **Healthcare provision**

Support for all of the above – although it would be helpful within the policy to acknowledge that enhanced school drop-off/pickup facilities have the potential to increase vehicular traffic to the school. The emphasis should therefore be on safer provisions rather than increased facilities and support for active travel, such as walking and cycling, should be encouraged.

The existing key services and facilities identified for retention are located in Barrow, towards the centre of the Neighbourhood Plan Area, and comprise:

- **Barrow VC Primary School – at the northern part of the main settlement**
- **Village Nursery (private) – near the centre of the main settlement**
- **Post Office – at the northern part of the main settlement**
- **Village Hall & Meeting Room – near the centre of the main settlement**
- **2 pubs – The Three Horseshoes in The Street and The Weeping Willow on Bury Road**
- **2 Convenience Shops - near the centre of the main settlement**

- **1 Sporting Goods/Country Shop - at the northern part of the main settlement**
- **1 Takeaway Restaurant (fish & chips) - near the centre of the main settlement**
- **1 Health Centre - near the centre of the main settlement**
- **1 Play Area - near the centre of the main settlement**
- **2 Hairdressers**
- **2 Churches – All Saints (grade I listed) at the northern part of the main settlement and a Chapel near the centre of the main settlement.**
- **Allotments at Mill Lane**

Support for all of the above – although it would be helpful within the policy to emphasize that these services and facilities are distributed around the village rather than all in the village centre as Figure 3: Services and Facility Locations Plan, on page 26 of the Neighbourhood Plan, shows.

There will be a presumption in favour of retaining all of the above existing community facilities and resisting any proposed changes of use, resulting in the permanent loss of these facilities, unless it can be clearly demonstrated that the facilities are no longer required or that they are no longer economically viable.

Any proposals that would result in the net loss of any of the above listed community facilities, will not be supported unless accompanied by appropriate evidence which meets the specific tests and requirements of Policy DM41 (Community Facilities and Services) of the Joint Development Management Policies Document (2015).

POLICY BCD10 – Ecology and the Natural Environment

New development proposals should demonstrate that there will be no unacceptable net impacts upon the biodiversity and ecology of the natural environment. Development proposals which could potentially result in significant harm to biodiversity, must have regard to the ‘mitigation hierarchy’ of a) avoidance, b) mitigation and c) compensation, in order to be supported.

New development proposals must also meet all of the following criteria:

- i. **Development proposals will be expected to protect local habitats and species, especially those covered by relevant legislation and to achieve enhanced levels of biodiversity net gain, above statutory minimum requirements, where possible, by creating new habitats for wildlife.**

Support – although it would be helpful within the policy to acknowledge that appropriate mitigation can include, as appropriate, the relocation and creation of new habitats. It would also be helpful to outline what is anticipated to be enhanced levels of biodiversity net gain.

- ii. **Development resulting in any significant net harm to ecology will not be supported, without suitable mitigation. Where such harm cannot be reasonably avoided it must be suitably demonstrated that adequate mitigation or compensation for the impact on biodiversity can be put in place and maintained as part of the development.**

As above, support the acknowledgement that a scheme can provide appropriate mitigation, including the relocation and creation of new habitats.

- iii. **All new housing development of five units or more will be required to contribute towards the improvement of local wildlife habitats.**

Support – although it would be helpful within the policy to outline what is anticipated to be the improvement of local wildlife habitats.

- iv. **Development proposals which result in unacceptable levels of soil, air, water or noise pollution, will be not be supported.**

Object – this is adequately covered by existing legislation.

- v. **Any other supporting information, as may be required by prevailing Local Plans, should be provided to enable full consideration of the proposals.**

It would be helpful within the policy to outline what is anticipated to be any other supporting information.

POLICY BCD11 – Protection of Local Heritage Assets

Proposals to alter, extend or change the use of a listed building within Barrow and Denham will be considered objectively by the Parish Council, having regard to the present and future economic viability or function of the listed building, provided that the proposals contribute to the preservation of the building and all of the following criteria are met:

- i. **A clear understanding of the significance of the building and its setting, has been provided, with an assessment of the potential impact of the development proposal on that significance;**

Support.

- ii. **The proposals are not detrimental to the identified character of the building or any architectural, archaeological, artistic or historic features associated with it, that contribute towards its special interest;**

Support.

- iii. **The proposals are of an appropriate scale, form, height, massing, and design which respects the existing building and its setting and appropriate materials and methods of construction, which respect the character of the building, are proposed;**

Support.

- iv. **Any other supporting information, as may be required by prevailing Local Plans, is provided to enable full consideration of the proposals, having special regard to the desirability of preserving heritage assets and their settings.**

It would be helpful within the policy to outline what is anticipated to be any other supporting information.

Proposals for new development which indirectly affect, but are proximate to, listed buildings or other heritage assets in Barrow and Denham, should provide a clear justification for the works, to ensure such development does not cause harm to their setting and should provide evidence that any impact of the proposed development is clearly outweighed by the public benefits.

POLICY BCD12 – Active Transport and Accessibility

During the Plan period to 2041, the impact of all future new development on the existing local highway network, facilitated by the policies of this Plan, will be suitably mitigated by encouraging walking, cycling and other non-car modes, including public transport. Proportionate investment in new footpath connections, including measures to enhance pedestrian safety and local cycle routes will be expected from all major applications submitted within the Neighbourhood Plan Area, consistent with the scale and nature of the development proposed.

In addition, the following criteria should be met:

- i. **All new development proposals should promote sustainable transport choices with a clear order of priority, sequentially to; a) reduce the need to travel, b) encourage walking and cycling, c) encourage public transport and shared transport, and d) facilitate sustainable levels of private transport.**

Support – although it would be helpful within the policy to acknowledge that public transport needs to be commercially viable to be sustained.

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

Object – it is not the provision of parking facilities which encourages car-based modes of transport. If appropriate alternatives are provided the car can stay at home.

- iii. **All new residential development proposals shall make provision for cycle parking and electric charging facilities to encourage the use of low carbon emission vehicles. An appropriate level of secure cycle storage and cycle parking should also be provided for use by all new homes.**

Particularly support.

- iv. **New development should demonstrate that it is sufficiently flexible to respond to likely anticipated changes in transport technology and is future proofed, or can be adapted to support, enhanced smart mobility services.**

Support.

POLICY BCD2 – Strategic Site Allocation:

Land at Barrow Hill Land to the south and east of Barrow Hill and land south of Barrow Forge, collectively known as Land at Barrow Hill, as identified on the Policies Map, is allocated in the Plan period for high quality mixed-use development, within a landscaped setting, to create a new Southern Gateway to Barrow. Development of the 13.5 hectare combined site will be undertaken in accordance with the concept diagram set out at Figure 4 of this Plan.

It should be noted that the three Landowners involved in the allocation are aligned in their commitment to its delivery through working constructively with the Parish Council and stakeholders to ensure the parcels of land can come forward in a way that significantly benefits the local community.

The Site allocation will deliver all of the following development criteria:

- i. **Around 170 new homes (including 30% affordable new homes).**

Regarding the delivery of the allocation the following is anticipated:

30% provision of affordable new homes will be spread between east and west.

Approximately 5% of 170 new homes will incorporate provision for home working.

- ii. **The delivery of a percentage of the new market homes as custom or self-build homes, in accordance with local plan policies.**

Regarding the delivery of the allocation the following is anticipated:

Approximately 5% of 170 new homes will be custom or self-build homes.

Custom or self-build new homes will be located within the new housing east and west of Barrow Hill.

Custom or self-build new homes will meet the needs identified on West Suffolk Council's register.

Custom or self-build new homes will meet the needs identified from residents of the parish.

iii. A broad mix of new homes and tenures, providing high quality housing accommodation for families, smaller households and single occupants.

Regarding the delivery of the allocation the following is anticipated:

Around 119 new homes would be private/market.

Around 51 new homes (30%) would be affordable.

Around 15 of the 51 affordable new homes would be shared ownership (intermediate housing).

Around 36 of the 51 affordable new homes would be affordable rent.

Likely mix of new homes to be:	0 - 5%	1 bed
	25 - 35%	2 bed
	25 - 35%	3 bed
	25 - 35%	4/5 bed

The above broad mix will include family, custom/self-build and later living homes.

New homes will be constructed to future homes standards.

New homes will be designed to be energy/water efficient and to incorporate renewable energy provision.

Waste is to be separated at source within the new homes for enhanced recycling potential.

EV charging and broadband will be provided to all new homes.

All new homes will be built to 'accessible and adaptable' standards, with a proportion built to 'wheelchair user' standards, to be adaptable to changing needs.

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

Regarding the delivery of the allocation the following is anticipated:

Around a 60 – 80 bed care home (including food, laundry, health and communal provision) will be provided.

It should be noted:

That interest has been received from care home providers – upon allocation in an adopted ('made') neighbourhood plan it is envisaged that this interest will materialise in an appropriate planning application(s) to be discussed with the parish council (and local community) before submission.

The allocation in an adopted neighbourhood plan provides certainty to a provider that provision for a care home/assisted living has already been agreed in principle.

As appropriate - assisted living accommodation can be provided as intermediate accommodation before care home accommodation is required.

The above can be provided on either the employment allocation sites (noting that they can often generate far more jobs than conventional employment uses) or within the area of the 170 new homes.

Around 10% of the 170 new homes will be bungalows.

It should be noted that the description of assisted living can be as follows:

The level of care provided in assisted living facilities sits in between sheltered housing – which provides older people with support in their day-to-day tasks but not round-the-clock care – and residential care – which is suitable for individuals who need 24-hour care and support in order to live life to the full.

Like a care home, assisted living communities offer 24-hour support with personal care needs, such as washing, dressing and taking medication, but residents live in self-contained flats rather than in suites.

It is often the case that assisted living is provided in tandem with a care home so as to share services and to provide a stepping stone between later living housing provision.

- v. **New employment facilities, comprising modern bespoke business space for new employment start-ups and other forms of agile remote working. Land which has been allocated for employment use as part of this strategic allocation shall not be used for any other purposes, until such time as all other appropriate alternative land uses have been fully evaluated, via an appropriate level of marketing, based on a cascade approach, whereby residential use is the least acceptable alternative option.**

Regarding the delivery of the allocation the following is anticipated:

Employment land is to be serviced to aid delivery. This means access and utilities provided into the employment site/allocation. Servicing employment sites alleviates a potential financial burden on businesses and would make the employment allocation more attractive to businesses wanting a new home in the village (because the costs would be notably reduced by the employment allocation already being serviced).

Office and workshop accommodation is to be provided to ensure a broad spectrum and choice of employment opportunities e.g. for start-ups or remote working. This approach helps to deliver modern/contemporary business space, in line with current market requirements, which complements other employment uses.

EV charging and broadband is to be provided to all employment uses.

It is anticipated that speculative building is to be undertaken to kick-start delivery of the wider employment site. This would be undertaken in tandem with servicing the employment allocation.

vi. Improvements to the footpath linkages within Barrow and contributions towards improved sustainable transport opportunities, including new cycleways and improved bus services.

It is intended that financial contributions are to be made, in line with Suffolk County Council (as the Local Highway Authority) and Active Travel England requirements, regarding the above sustainable travel infrastructure .

It should be noted that Suffolk County Council (as the Local Highway Authority and body responsible for public right of ways) and West Suffolk Council are likely to identify links from the new homes/employment into the village that will need to be improved (to enhance connectivity) and delivered as part of any planning permission.

Improved public transport provision (increased bus services) will be the subject of discussion with the local bus operator. These discussions are likely to result in the improvement to existing services (e.g. greater frequency or extended service times) or the provision of a new service. If it is the later then there would be an expectation to provide a new bus and fund a driver(s) for a defined period. Either way, the intention would be to attract enough passengers to make the service commercially viable in its own right and as such ensure its longevity.

It should be noted that the cost of enhanced sustainable travel infrastructure would be taken into account in delivering the 170 new homes/employment opportunities.

vii. All surface water from the Site to be drained via Sustainable Urban Drainage (SuDS) facilities located within the allocated area.

SuDS are to be provided as part of extensive green infrastructure provision.

Regarding foul drainage:

The cost of delivering the mixed use allocation in the main is covered by Anglian Water's standard charge (e.g. a financial contribution paid in relation to each new home).

Anglian water will provide a 'point of connection' (this is where the scheme should connect into the existing foul system) and the cost of the works to get to this point is for the development to fund.

If the existing system needs to be upgraded to accommodate the mixed use allocation, then the cost of these works will be funded by the development. It is understood, however, that the existing system can accommodate the mixed use allocation without any upgrading.

It should be noted that it can be the case where new development (although not responsible) can improve existing situations because the work it requires can be aligned (at little extra cost) with potential improvements to the existing system.

- viii. The delivery of enhanced new landscaping and green infrastructure, including formal and informal public open space provision, in accordance with adopted Local Plan requirements and the creation of deliverable biodiversity and habitat enhancements.**

Allotments / community orchard / informal open space / creative play equipment are to be provided in line with West Suffolk Council's standards and Parish requirements. The cost of these would be taken into account in delivering the 170 new homes.

Substantial landscaping, including the provision of woodland belts to sustain the identity of the village, will be provided as part of the delivery of the new homes.

Biodiversity and wildlife enhancements will be provided to ensure a net gain and the increased ecology of the parish.

It should be noted that as of January 2024 a minimum requirement of 10% biodiversity net gain will be required – the current scheme has the ability to achieve a significantly greater percentage.

- ix. Contributions to improved health facilities serving Barrow cum Denham.**












Financial contributions will be made in line with NHS requirements.

- x. Contributions to improvements to Barrow Village Primary School.**

Financial contributions will be made in line with Suffolk County Council's (as Education Authority) requirements.

All of the above outline the successful delivery of the allocation within the neighbourhood plan, as informed by input from the parish council and other stakeholders, as illustrated on the next page.



- | | | |
|---|--|---|
|  New Homes |  SuDS |  Pedestrian/Cycle Link |
|  Employment |  Community Orchard |  Equipped Play Area |
|  Allotments |  Walking/Cycling Routes |  Tree Lined Village Gateway |
|  Informal Amenity Space |  Existing PROW | |

POLICY BCD9 – Support for New Sport and Recreation Facilities

New development proposals to provide larger scale sporting and recreational facilities, located outside of the defined Settlement Boundaries of Barrow and Burthorpe, will be considered on their merits, taking into account the specific sporting benefits provided, subject to meeting all of the following criteria:

- i. **All development proposals should be of an appropriate scale and character for their location and demonstrate high standards of layout, design, construction and landscaping, including for ancillary facilities, such as car parking.**

From discussions which have indicated the likely scale of changing facilities required it is anticipated that provision would need to be made for around 50 - 100 car parking spaces and 30 - 50 cycle parking spaces.

- ii. **The location of any all-weather playing surfaces, and associated lighting, will only be permitted where there is not an unacceptable impact upon existing residential amenity.**

All-weather playing surfaces and associated lighting are currently not envisaged to be included within any formal sports provision albeit such proposals can be the subject of an ongoing dialogue with the parish council and appropriate stakeholders.

- iii. **Where new buildings are proposed to help facilitate the sporting use, i.e. changing rooms, pavilions etc, these buildings should normally be single storey only and constructed of sustainable materials, such as indigenous timbers, in a form which is sympathetic to the rural character of the area.**

It is anticipated that the size of any new pavilion will meet the needs identified from residents of the parish. An example of a standard pavilion is provided at the end of this section.

- iv. **New development must not erode the existing settlement gaps between Barrow, Burthorpe and Denham nor have any significant visual impact upon the surrounding countryside, or the amenities of neighbouring residents, by reason of inappropriately located new buildings, lighting or ancillary structures etc.**

Supported.

- iv. **All new development proposals permitted under this policy, should demonstrate that they are well related to local services and can be accessed by sustainable transport modes, including walking and cycling.**

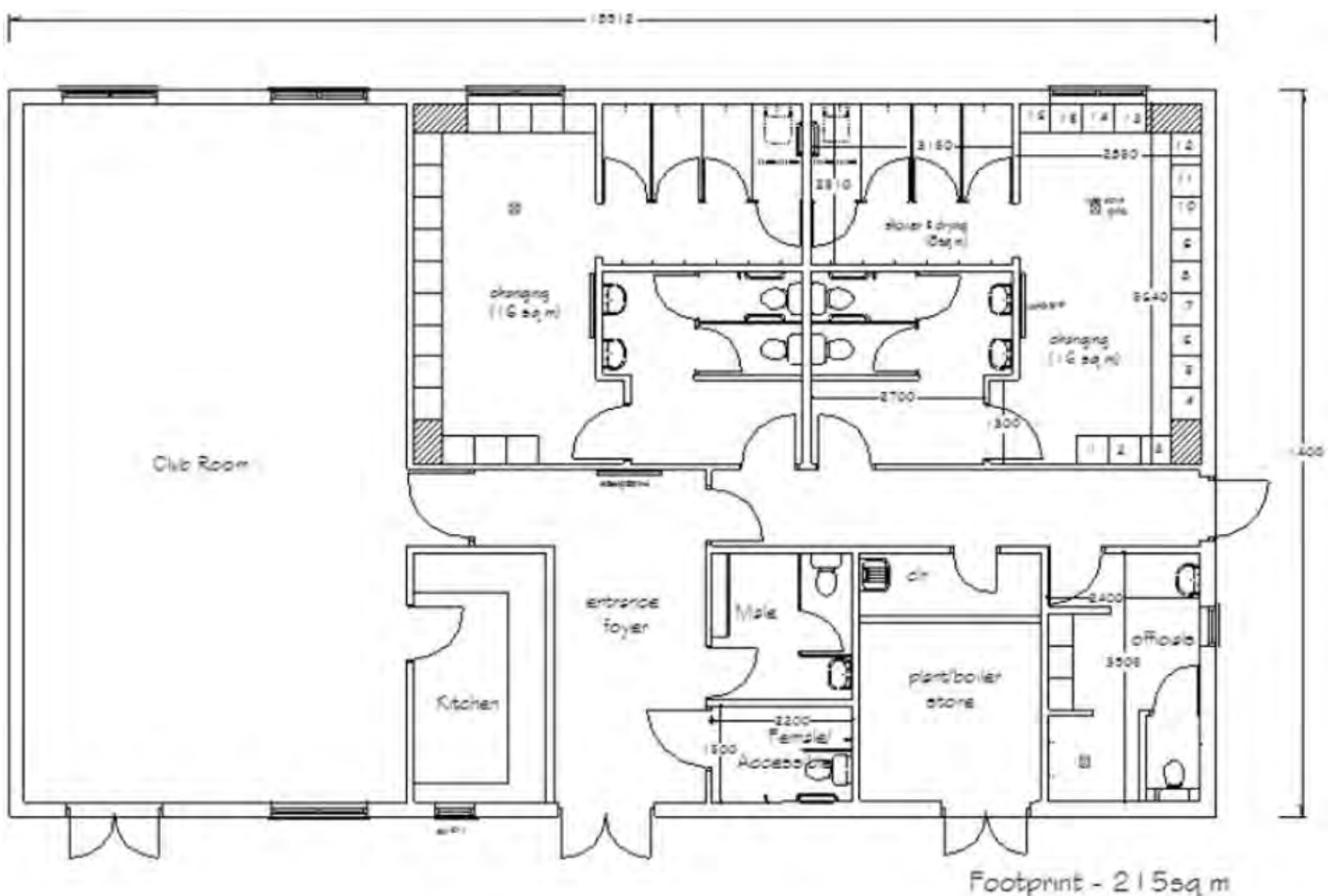
It can be advised that any new sport and recreation facilities provided would:

- Be accessed from Barrow Hill.
- Be through the new homes on the western side of barrow hill if located in the area to the west of the neighbourhood plan's allocation.

- Include appropriate links for walking and cycling.
- Be c.5 ha (c.12 acres) in area.
- Be funded by the scheme for 170 new homes and employment.

v. Proposals should be accompanied by evidence of intended management and arrangements for future long term stewardship.

It should be noted that new sport and recreation facilities, as part of the planning application submitted for the mixed use allocation, could be provided on a long lease basis at a 'peppercorn' rent (with the landowners responsible for management and maintenance of the facilities) or alternatively, a public body (e.g. the parish council) could be responsible for management and maintenance of the facilities with adequate financial provisions made for them to fund these matters.



Local Vision

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

4.1 The local vision for the Barrow-cum-Denham Neighbourhood Plan Area recognises the role of Barrow as a growing, vibrant, Key Service Centre in the settlement hierarchy and the associated responsibility to maintain support for the vitality and viability of its existing local services, for the long term benefit of the local community.

Support.

4.2 Therefore the vision is to allow for further controlled, sustainable, growth in key selected areas, during the Plan period to 2041, the locations of which, will be strongly influenced by this Neighbourhood Plan, taking into account the needs and sensitivities of the local area. The vision is for all such development to be particularly well designed, so as to positively enhance and contribute to the diverse character of Barrow-cum-Denham.

Support.

4.3 The vision also seeks to strongly protect the existing settlement characters and identities of Barrow, Denham and Burthorpe, by carefully controlling all future growth, so as to prevent any neighbouring coalescence, or the erosion of sensitive green gaps between settlements. This will help to ensure that Barrow-cum-Denham continues to thrive into the future and remains a pleasant and integrated place to live and work, providing a high quality of life for all of its existing and future residents.

Particularly support.

4.4 Hand in hand with the chosen growth strategy, the vision additionally seeks to protect the undeveloped rural countryside around Barrow cum Denham and Burthorpe to ensure that it is suitably maintained in its present condition and so preserved for future generations.

Support – subject to appropriate schemes coming forward which benefit the community.

4.5 The overarching vision of this Plan translates into six sets of Key Objectives for Barrow-cum-Denham, which covers six inter-related topics. These Objective headings are:

- The Built and Natural Environment;
- Housing supply and Sustainable New Homes;
- New and Existing Community Facilities;
- Support for Local Business and Employment;
- Health and Well Being and;
- Active Transport and Accessibility.

Support – subject to comments made below regarding the Key Objectives.

Key Objectives

Built and Natural Environment

- To ensure that future new growth is fully integrated so that Barrow cum Denham retains its distinctive rural character and qualities.

Support – although it would be helpful to outline what is anticipated by fully integrated.

- To ensure that all new development is well designed and enhances and contributes to the diverse rural character of Barrow-cum-Denham.

Support – although it would be helpful to understand what is understood to be the diverse rural character of Barrow cum Denham.

- To protect the existing settlement identities of Barrow, Denham and Burthorpe by preventing any coalescence, or the erosion of any sensitive green gaps between the settlements.

Particularly support.

- To protect and where possible, enhance, all positive features of the existing built and historic environment, including individual building design features, as part of new development proposals.

Support – although it would be difficult to enhance all positive features.

- To protect and enhance important open green spaces and other cherished natural areas within the Neighbourhood Plan Area.

Support – although referencing cherished natural areas in the parish is likely to be subjective.

- To maintain existing distinctive views and visual connectivity with the surrounding countryside from within the built-up areas of Barrow, Denham and Burthorpe.

Support.

- To protect and wherever possible, seek to enhance natural biodiversity in all forms of new development.

Support subject to the use of appropriate mitigation being acknowledged.

Health and Wellbeing

- To retain a strong sense of community for both existing and future new residents.

Particularly support.

- **To ensure that Barrow-cum-Denham remains a pleasant and integrated place to live and work, providing a high quality of life for all its residents.**

Particularly support.

- **To encourage a healthy and active community via sustainable access to outdoor sport and recreation for the benefit of all the community.**

Particularly support.

- **To support new development proposals which provide facilities to assist the development of long-term health and wellbeing in Barrow-cum-Denham.**

Particularly support.

New and Existing Community Facilities

- **To protect existing community facilities, including retail, education and recreation facilities and support further growth in these areas as appropriate.**

Support.

- **To encourage the complementary provision of new facilities, and/or other support, in association with new development proposals.**

Support.

- **To encourage the use of both new and existing community facilities by all sections of the community.**

Support.

- **To resist development proposals that would result in a net loss of existing community facilities in Barrow-cum-Denham, unless exceptionally justified.**

Support – although a high bar is required to assist in the retention of facilities.

Support for Business and Employment

- **To support the viability and retention of existing small businesses in Barrow cum Denham and to support further small scale business creation, in appropriate and sustainable locations in the area.**

Particularly support.

- To encourage the delivery of new infrastructure that supports existing business growth and retention and helps to facilitate sustainable new business creation.

Particularly support.

- To support the appropriate upgrading of existing facilities, where this will help to maintain viability and would not give rise to any significant local impacts.

Support.

Active transport and Accessibility

- To help minimise the impact of future development on the existing local highway network, by encouraging walking, cycling and other non-car modes, including public transport to other areas.

Support – although it would be helpful to acknowledge that public transport needs to be commercially viable for it to be sustainable.

- To promote and encourage measures to improve the wider safety of the roads and footways throughout the Neighbourhood Plan including the enhancement of cycle routes in the Neighbourhood Plan area.

Particularly support.

- To promote improvements by encouraging investment in new footpath connections within Barrow cum Denham, including measures to enhance pedestrian safety and facilitate further safe crossing areas.

Particularly support.

Housing Supply and Sustainable New Homes

- To ensure an adequate supply of sustainable new market and affordable housing is delivered to meet the local needs of the Neighbourhood Plan Area to 2041.

Particularly support.

- To enable local people to stay in Barrow-cum-Denham as their household needs change, or to be able to return to the area later in life as their personal needs change.

Particularly support.

- To ensure a good mix of housing scales and types with integration between different tenures of housing within Barrow-cum-Denham, to help maintain a strong sense of community, for both existing and future residents.

Particularly support.

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

Support.

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

Particularly support.

- **To reduce the environmental impact of new homes and other buildings using appropriate energy and water saving technologies.**

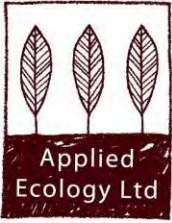
Support.

OF PARTICULAR NOTE:

Thank you for the opportunity to provide representations to each policy in the Draft Neighbourhood Plan.

The opportunity would be welcomed to run through and expand on these representations with the Neighbourhood Plan Steering group.

Thank you in anticipation.



Land East of Barrow Hill, Barrow (WS010) – Potential Impacts on Ancient Woodland

Background

Land east of Barrow Hill (WS010), referred to as “the Site”, is being promoted for mixed use development (residential, commercial, and public open space) and is included in the West Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA, February 2020).

This technical note presents a high-level desk-based assessment of the likely impacts of the proposed development on nearby ancient woodland¹ based on proximity, links via Public Rights of Way (PRoW) and other factors.

Proximity of the Site to ancient woodland and PRoWs

Eight blocks of ancient woodland are located within 1.5km of the Site (**Figure 1**). These woodlands are listed in **Table 1**, together with their proximity.

Table 1: Ancient woodland located within 1.5km of the Site.

Ancient woodland	Straight line distance from the Site (m)	Access along or through ancient woodland via PRoW network	Distance from Site using roads and PRoWs (m)
Wilsummer Wood	162	Yes – along edge	162
Barnfield Hill Wood	656	Yes – along edge	1,138
Denham Thicks	836	No	n/a
Hockerhill Wood	1,037	No	n/a
Great Papeley Wood	1,119	Yes – along edge	2,206
Hearse Wood	1,286	Yes – along edge	2,315
The Park	1,446	Yes – through	1,700
Little Papeley Wood	1,493	Yes – through	3,299

Compliance with statutory guidance

Natural England’s current standing advice in relation to ancient woodland and ancient/veteran trees² states the following:

“For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.

¹ Based on Natural England’s inventory of Ancient Woodland (England) updated 22 March 2022.

² <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort>



For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area."

The buffer zone between the Site and Wilsummer Wood is 162m, and therefore greatly exceeds the recommended minimum development ancient woodland stand-off.

Potential impacts during construction

Given the distance between the Site and ancient woodland, the risk of significant adverse impacts occurring on ancient woodland due to development construction are considered very low and could be eliminated by adopting typical best practice working practices.

Potential impacts during operational use

Aside from a possible increase in recreational use, and in the absence of detailed technical information, no other obvious mechanisms exist that could cause significant harm to nearby ancient woodland.

In terms of impacts such as disturbance, damage, and deterioration of ancient woodland due to an increase in recreational use, and with reference to **Table 1, Debham Thicks** and **Hockerhill Wood** are not accessible to the public using existing PRoWs and would not therefore be expected to be at greater impact risk due to the development.

Wilsummer Wood and **Barnfield Hill Wood** are both relatively close to the Site and have PRoWs along their boundaries, but no apparent internal woodland access. The risk of significant adverse impacts on these ancient woodlands occurring due to a small increase in PRoW use along their boundaries seems very unlikely and low risk. **Great Papeley Wood** and **Hearse Wood** also have boundary PRoWs but are located over 1km away from the Site (>2km using roads and PRoWs) and are therefore at reduced risk.

The Park and **Little Papeley Wood** do have PRoWs crossing through ancient woodland, but wider internal access within these woodlands is not known. Given these woodlands are located over 1.4km away from the Site (1.7km and 3.3km via existing roads and PRoWs, respectively) the risk of a significant increase public use of the PRoWs crossing through these woodlands and resulting in significant harm is considered unlikely.

It is of note that the Local Wildlife Site (LWS) citation for Wilsummer Wood (the closest block of ancient woodland and probably the area of greatest risk) does not mention recreational impacts as a concern or potential threat but does recognise that management neglect and deer browsing are factors resulting in woodland degradation.

Conclusions

The closest area of ancient woodland to the Site is located 162m away and is therefore much further away than the minimum statutory buffer of 15m. No construction impacts would be expected and indirect impacts due to an increase in recreational pressure, for instance, are unlikely. Low levels of recreational use is probably less of a threat to these areas of ancient woodland than management neglect and/or deer browsing.



Land east of Barrow Hill Barrow (WS010)

Ancient woodland and Public Rights of Way

- Proposed application site (WS010)
- Ancient & Semi-Natural Woodland
- Ancient Replanted Woodland
- Footpath
- Bridleway
- Byway open to all traffic
- Restricted byway



Figure 1

Map Scale @ A4: 1:20,000

Surveyed by: n/a

Survey date: n/a

Drawn by: RJH

Checked by: DP

Status: Final



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

LAND EAST OF
BARROW HILL, BARROW, SUFFOLK

VISION DOCUMENT

PREPARED BY TWENTY-NINE ARCHITECTURE LTD
DECEMBER 2020



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E: info@29architecture.co.uk
Web: www.29architecture.co.uk

VISION STATEMENT

“To deliver a new, high-quality, community-led, village neighbourhood, offering a truly sustainable way of living, embracing new ways of working, a healthy/outdoor lifestyle and much needed local affordable housing”

LAND EAST OF BARROW HILL, BARROW, SUFFOLK

INTRODUCTION

This Vision Document has been prepared by Twenty-Nine Architecture Ltd to support the inclusion of the land at Barrow Hill, Barrow, Suffolk for allocation within the emerging West Suffolk Local Plan being prepared by West Suffolk Council. Twenty-Nine Architecture Ltd have been instructed by the landowner, a local resident, who is in control of the land east of Barrow Hill, Barrow.

The vision is to create a thriving new neighbourhood that is fully integrated into the local community. The proposal seeks to create a step-change in how development is delivered, fully embracing digital technologies, new ways of working and living.

Sustainability will be core to the proposals, which, taking account of the views of local residents and businesses alike, will create an attractive landscape-led new village neighbourhood, with homes and business space, as well as the potential for a range of new community facilities. The focus on healthy living and quality of life will be a central theme and the proposals aim to link together existing footpaths and public rights of way and create new circular walks and areas of green space where community and fitness activities can take place.

The housing will be informed by local needs, and contain affordable housing prioritised for local people and those with a connection to Barrow and its hinterland of small hamlets. In recognition of the increase in home working, there is potential for new publicly accessible flexible business space enabling local people to host meetings, seminars, and other activities in the village without the need to acquire business space.

The vision for the site has been informed by a robust evidence base and should be read in conjunction with the following documents -

- Twenty-Nine Architecture Ltd Written Representations
- Landscape Statement by Southern Ecological Solutions Ltd
- Flood Risk and Surface Water Drainage Review by Stantec UK Ltd
- Transport and Access Review Technical Note by Stantec UK Ltd



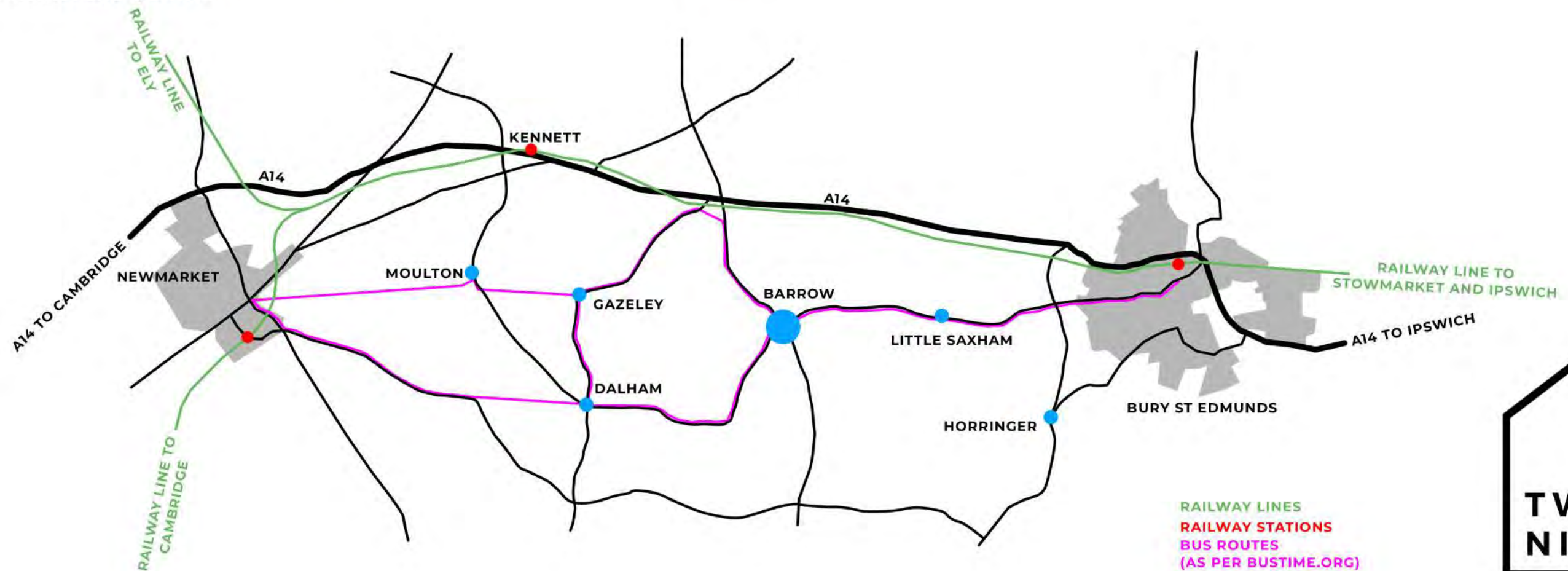
LAND EAST OF BARROW HILL, BARROW, SUFFOLK

CONTEXTUAL ANALYSIS- CONNECTIONS

The Site sits in a highly sustainable location within Barrow, West Suffolk, which is allocated as a Key Service Centre, and is located within 6.5km (4miles) of Bury St Edmunds, 12km (7.5miles) from Newmarket and 35km (22miles) from the world recognised city of Cambridge

Barrow is served by an extensive bus service to local villages and towns and has an abundance of facilities including a primary school, Post Office, doctors surgery, village shop, church, public house and employment/businesses.

Bury St Edmunds and Newmarket also operate as gateways to the wider strategic road network, with both being served by the A14. Railway stations at Bury St Edmunds, Newmarket and Kennett have links to Cambridge, Stowmarket and Ipswich.



LAND EAST OF BARROW HILL, BARROW, SUFFOLK

CONTEXTUAL ANALYSIS- VILLAGE CHARACTERISTICS

KEY

-  The Site
-  Homes under construction
-  Public Right of Way
-  Pedestrian Footpath links
-  Listed buildings
-  Wilsummer Wood
-  Schedule Monument
-  Interpretative green gap between settlements



LAND EAST OF BARROW HILL, BARROW, SUFFOLK

CONTEXTUAL ANALYSIS- LOCAL SERVICES AND FACILITIES

KEY

-  The Site
-  Primary School
-  Recreation Ground
-  Doctors/ Pharmacy
-  Convenience Store
-  The Three Horseshoes PH
-  Village Hall
-  The Green Wellie Nursery
-  The Weeping Willow PH
-  Business/ Employment



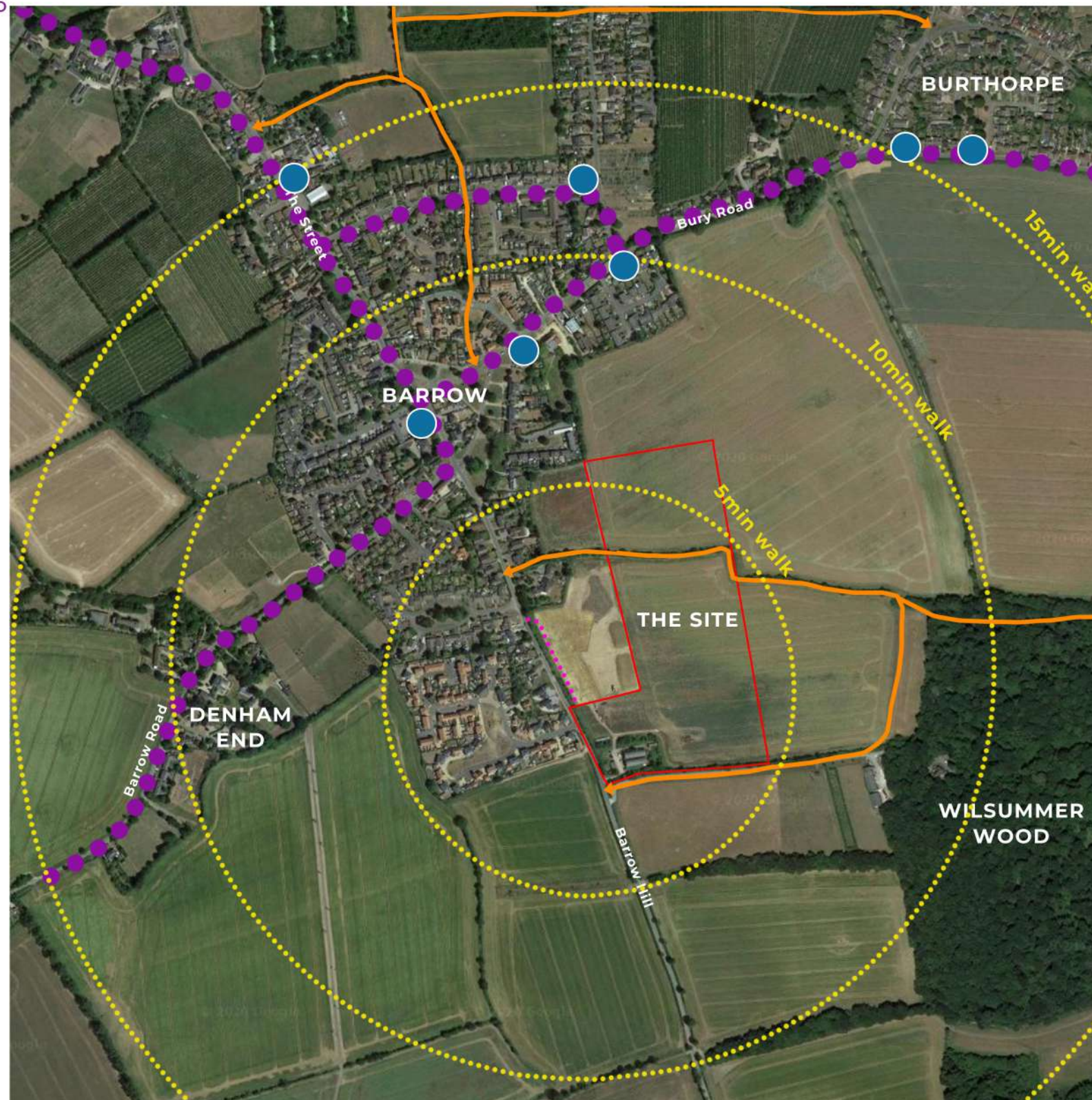
LAND EAST OF BARROW HILL, BARROW, SUFFOLK

CONTEXTUAL ANALYSIS- PEDESTRIAN/ CYCLE LINKS AND PUBLIC TRANSPORT ROUTES

KEY

-  The Site
-  Existing Bus Stop
-  Public Rights of Way
-  Existing Bus Routes
-  Existing Cycle Link

TO GAZELEY AND
NEWMARKET



TO BURY ST EDMUNDS

LAND EAST OF BARROW HILL, BARROW, SUFFOLK

SITE OPPORTUNITIES AND CONSTRAINTS

Landscape

A landscape statement for the site has been prepared by Southern Ecological Solutions Ltd. to support this submission.

The document explains the appropriateness of development on the site and concludes that the north western part of the site is the least sensitive visually and is well suited to built development. There would be no significant effects on existing landscape features and mature hedges to the boundaries which will be fully retained in any development. The assessment also concludes that there is scope to provide a robust landscape buffer to the east to maintain a rural edge and further enhancements along the Barrow Hill frontage.

A number of opportunities and constraints have been identified, and accounted for, in this assessment. There is the opportunity to introduce two-storey residential buildings in keeping with the adjoining built forms and local vernacular. Strategic native planting adjacent to the perimeters of the residential area would provide a strong visual enclosure of the development as seen from Barrow Hill and Wilsummer Wood, and the public rights of way.

Ecology

The proposed site is intensively managed arable farmland that currently has low ecological value. A comprehensive ecology survey will be undertaken at the next stage in the relevant survey seasons, however walkover surveys of neighbouring sites have not identified any protected species or ecology that would detrimentally impact this site coming forward for development.

It is our vision not only protect existing habitats but to create new planting features that will enhance biodiversity and bring forward a new natural environment where ecology can thrive. Incorporating new planting of native species, buried woodpiles within hedgerows and a pond will enhance the biodiversity value of existing boundary habitats and encourage protected species such as bats and reptiles.



KEY

- | | |
|--------------------------|-----------------------|
| The Site | Proposed green space |
| Existing development | Proposed green buffer |
| Existing road network | Proposed green link |
| Existing mature planting | Existing Footpath |

LAND EAST OF BARROW HILL, BARROW, SUFFOLK

SITE OPPORTUNITIES AND CONSTRAINTS

Access

Stantec UK Ltd has undertaken an access appraisal, which confirms that the visibility splays and necessary set-back distances from Barrow Hill can ensure safe vehicular access to the site.

The site would deliver a sustainable development that is integrated with the existing local walking, cycling and public transport networks, that have connectivity with surrounding areas by these modes, as well as permeability through the site.

The site also benefits from a newly constructed dual pedestrian and cycle way linking to the centre of the village providing a safe and convenient route to the village amenities.

Flood Risk

Stantec UK Ltd has undertaken a Flood Risk and Surface Water Drainage Review, which confirms that the site is located within Flood Zone 1 of the "Flood Map for Planning", and is therefore appropriate for all types of development. The site is located in an area of very low to low risk of surface water flooding and therefore has the potential to support a range of sustainable measures to manage and control surface water run-off, with the view to deliver an integrated Sustainable Drainage System (SuDS).

These features will be fully joined up with ecology/habitat areas, green infrastructure, and public open space.

Utilities

The site benefits from its location adjacent to existing strategic infrastructure which will enable a connection to public water supply, electric and telecommunication services with a need for minimal network reinforcement to the site.



KEY

- | | |
|--------------------------|---|
| The Site | Existing Public Rights of Way and Cycle Paths |
| Existing development | Proposed vehicular network |
| Existing road network | Proposed pedestrian network |
| Existing mature planting | |

LAND EAST OF BARROW HILL, BARROW, SUFFOLK

VISION- A NEW WAY OF LIVING AND WORKING

In an ever changing world, our vision is to deliver a well-planned village neighbourhood that has the power to change lives and adapt to future ways of living, working and socialising.

The scheme has the chance to improve the lives of the local community for generations to come, creating a modern, sustainable and healthy community - where people are given the green infrastructure and services they need to thrive.

Quality of Life

External green spaces will provide a safe environment for residents to relax, work and exercise with the provision of green links to Wilsummer Wood, public footpaths and rural spaces creating a modern self-sustaining community that enhances the quality of life, built on the principles of NHS Healthy New Towns.

Housing and Living

Our vision is for the site to provide a new benchmark in sustainability. A proportion of homes will be zero-carbon in lifetime operation and built to be carbon neutral in production. The provision of allotments will create a self-sufficient community reducing the requirement for transport and reliance on deliveries.

Biodiversity and the Environment

We are committed to delivering a biodiversity net-gain of at least 20%. We will achieve this by protecting existing wildlife habitats and creating new rich habitats with a range of species benefiting the health and wellbeing of local residents.

It is envisaged to create a thoughtfully designed and considered development that creates a vibrant, resilient and sustainable place to live and work, with the health and wellbeing of the community at its heart.

Working and Jobs

With home-working being the new normal for many people, the scheme will incorporate community facilities for residents that provide meeting spaces and social areas that seek to provide healthy living and working environment that encourages home enterprise and creativity. These spaces will limit impact onto the transport infrastructure, reducing reliance on car travel and create a safe and secure environment for each resident.

Our vision for the site is to provide standalone Home Hubs within the private garden areas with the highest standards of digital technology to meet the needs of home-working. The hubs will allow residents to meet the requirements of their changing lifestyles, creating a quiet haven for home office working and the changing working environment.



LAND EAST OF BARROW HILL, BARROW, SUFFOLK

VISION- A PLACEMAKING APPROACH

The vision for the scheme is to create a sustainable new living environment, based around an established community with new homes that are accessible to everyone. The site will be an inclusive place where people want to live; one that promotes an active lifestyle and sense of wellbeing, and a place that future residents and the local community can be proud. The scheme will provide access to essential facilities including open spaces, landscaping and amenity areas along with home working and provision for self-sufficiency.

The proposed development will deliver a high standard of design with much needed affordable housing. The scheme will focus on establishing a strong sense of community, with accessibility to jobs and community facilities which benefits the local community and Barrow

The proposal at Barrow Hill will deliver a sustainable and environmentally design-led scheme, which is based on some key objective of good placement:



Affordable housing will be delivered with a community-led approach ensure locals can benefit.

Positive identity to ensure that the new development responds to the site and contextual opportunities, so fully integrating with its surroundings and defining new space.

Viable and sustainable place which is deliverable over the long-term and contributes in a positive way to the environmental, social and economic viability of the area.

A connected place which links and integrates with its immediate surroundings and the wider area.

A welcoming place which, through high-quality design, fosters a strong sense of place which maximises a sustainable way of life.

Delivering best practice and innovation by utilising new technologies and ideas that will reduce energy demands and ensure the environment effects of the proposal are minimised.

Quality homes for a wide range of local needs, space to live and play, good access to facilities, public transport and a place people and the local community can be proud.

LAND EAST OF BARROW HILL, BARROW, SUFFOLK

VISION- A SUSTAINABLE APPROACH

The development aims to deliver a sustainable and well-designed extension to Barrow, which contributes to the housing needs of West Suffolk and the local community, and positively responds to the opportunities of growth in sustainable locations.

The site is located in an unrivalled location within Barrow in a highly sustainable location close to the village centre. With West Suffolk continuing to focus some growth in its key service centres, this site represents an opportunity to deliver a much needed residential development with essential affordable housing in a strategic location.

The strategy for this site includes the following:

-Deliver new benchmarks in sustainability with a proportion of homes being zero-carbon in lifetime operation and each home built would be carbon neutral in production and delivering a biodiversity net-gain of at least 20%.

-Introduction of significant new landscape buffers, and structural planting, throughout the site and along its Eastern and Southern boundaries which will provide containment while enhancing the setting of the existing public right of way.

-Pedestrian links around the development, thereby forming part of a 'green grid/green infrastructure' network around and through the site, as well as providing improved links to the wider public cycle/ footpath network.

-The provision of a comprehensive landscape scheme, including open space areas and active frontages, within the housing areas adjoining the access roads to create an attractive and pleasant environment for the new residents.



LAND EAST OF BARROW HILL, BARROW, SUFFOLK

DEVELOPING THE CONCEPT

This concept diagram illustrates how the key principles and structure of a landscape and environmentally led masterplan could be delivered.

The concept is designed around a network of multi-functional green spaces, which create a strong landscape setting and links to its surroundings and existing infrastructure. The plan contains the following design characteristics based on analysis and concept masterplan.

- 1 -New access onto Barrow Hill, utilising existing public footpaths and cycle route to the west of the site providing direct access to the village center and local amenities.
- 2 -Approximately 120 new high-quality, sustainable homes providing a mix of unit types and tenures including affordable housing, employment space and community facilities.
- 3 -Green landscape buffer zone along the eastern edge creating a landscape feature and providing an important area for biodiversity.
- 4 -Sustainable Urban Drainage Systems (SuDS) to be incorporated within the scheme where possible.
- 5 -New area of public realm and integrated recreational areas throughout the scheme
- 6 -New area of public open space for organised residents exercise and activities
- 7 -Linked pedestrian and cycle access to public rights of way.
- 8 -Green corridor through site integrating existing public footpath and providing access to Wilsummer Wood
- 9 -Allotment area for residents and local community



LAND EAST OF BARROW HILL, BARROW, SUFFOLK

ILLUSTRATIVE MASTERPLAN



LAND EAST OF BARROW HILL, BARROW, SUFFOLK

CONCLUSION

The vision document including the illustrative masterplan and accompanying Landscape Visual Statement have been produced to provide an initial vision of how the site could be developed taking into account the issues, opportunities and design principles within this document.

The site provides an unrivalled opportunity for a sensitive extension to Barrow with much needed community facilities that create a high-quality place of an appropriate density and scale. The built form will adopt key design principles to ensure that the future community have an excellent environment to live play and work, which includes quality design, open space and affordable housing as well as creating a new benchmark for sustainability and the changing needs of homeowners. The development will provide:

- ✓ Approximately 120 high-quality and energy efficient homes offering a range of types and tenures including much needed affordable housing, thriving employment uses as well as home working and self-sufficiency;
- ✓ A landscape-led scheme based on a strong conceptual design with at least a 20% increase in biodiversity;
- ✓ A design based on the latest urban design principle, 'place-making' thinking, and best practice that seeks to create a sense of community and wellbeing. The development will have access to a range of new areas of public open spaces which can be enjoyed by all ages and abilities;
- ✓ A scheme which introduces real and practical measures to maintain and enhance the environment and opportunities for biodiversity including the Sustainable Urban Drainage System, landscape corridors, community open space and allotments;
- ✓ A development that is connected to its surroundings by providing new pedestrian connections to existing routes through the site and the reduction in reliance on car travel that creates a self-sufficient, safe and secure community.



Job Name: Land east of Barrow Hill, Barrow
Job No: 50471
Date: 4th December 2020
Prepared By: [REDACTED]
Subject: Flood Risk and Surface Water Drainage Review

1. Executive Summary

- 1.1. This appraisal has been prepared by Stantec UK, on behalf of our client [REDACTED], to support the promotion of a site for up to 117 residential and commercial units in the West Suffolk Emerging Local Plan.
- 1.2. The site is located the east of the settlement boundary of Barrow, in the district of [REDACTED].
- 1.3. The site is located predominately in Flood Zone 1 (low probability from fluvial (river) flooding). The topography indicates a fall across the site from west to east.
- 1.4. The site is shown to be at very low risk from Surface Water flooding or inundation from a registered reservoir.
- 1.5. As part of the delivery for this site it is proposed to include a fully integrated sustainable surface water management system, designed to not only manage flood risk and avoid detriment to offsite areas, but to also provide betterment to water quality and provide ecological enhancement. The premise of this report is to inform what will be used in the development of a future masterplan and for promotion at the Local Plan Stage.
- 1.6. The site will accommodate a range of sustainable measures to manage and control surface water run-off such as basins, swales, porous paving and bioretention features, with the view to deliver integrated SuDS.
- 1.7. Overall, by embracing the opportunities and ensuring principles of this appraisal are incorporated within a future masterplan and drainage strategy, the site is well positioned to deliver the housing needs without increasing flood risk to offsite areas. It offers the prospect for a sustainable development with multi-functional environmental enhancement through the introduction of a variety of SuDS. Meeting the requirements of both national and regional policy.

2. Introduction and Background

- 2.1. This appraisal sets out the high-level flood risk and surface water drainage strategy review for the proposed development.
- 2.2. The information used to inform this technical note is a desk-based review of publicly available information, documents, and reports. This considers existing site conditions and the nature of existing flood risk constraints associated with fluvial, groundwater, reservoirs/impounded water features, surface water and sewer sources. The potential surface water drainage requirements are also reviewed on a broad scale.

- 2.3. The purpose of this report is to explore how the strengths of a development in this location can be harnessed and developed to enable local flood risk and surface water drainage policy objectives to be met. A brief overview of the impacts associated with development in this location, both in terms of opportunities for sustainable surface water drainage and in terms of flood risk have also been provided.
- 2.4. This document has been prepared as a template for the sustainable surface water drainage strategy for the site at planning but also to help inform the next stage of the call for sites of the West Suffolk Local Plan process.
- 2.5. The site comprises agricultural land is bounded by Barrow Hill and existing residential settlement to the west and existing agricultural land to the east and north.
- 2.6. Refer to Figure 1 below which shows the site location.



Figure 1: Site Location

- 2.7. Existing ditches / land drains are located at the site, situated along the western boundary of Barrow Hill and also traversing the central area of the site. It is assumed these feature as classed as ordinary watercourses and based on the Topographical information available accept runoff from the site.
- 2.8. OS maps indicate that ground levels across the site fall from the west to the east. Ground levels are highest along the south western boundaries of the site, over 96m AOD. Ground levels decrease in a easterly direction towards low point of approximately 88m AOD at the centre of the eastern boundary. Refer to **Figure 2** for overview of topography.



Figure 2: Topography

3. Flood Risk and Surface Water Drainage Policy

National Planning Policy Framework

- 3.1. This section provides an overview of national and local flood risk and surface water drainage policy objectives relevant to the area of study. These are the foundation to inform the emerging design of the site.
- 3.2. The National Planning Policy Framework (NPPF) details the current national planning policy for flood risk in England. The NPPF has strict tests to protect people and property from flooding which all local planning authorities are expected to follow. The accompanying Planning Practice Guidance (PPG) to the NPPF advises on how planning can take account of the risk associated with flooding and coastal change.
- 3.3. The online Flood Maps are used to assign a flood risk classification to all land throughout England with PPG defining the vulnerability of development and land use.
- 3.4. The PPG contains Table 3 (Flood Risk Vulnerability Classification and Flood Zone Compatibility), detailing appropriate development within each of the flood zones based on the vulnerability classification in addition to further planning requirements (e.g. the Sequential and Exception Test) to assess if the development is at an acceptable risk of flooding.
- 3.5. In accordance with the NPPF and PPG, a Flood Risk Assessment (FRA) will be required as the site is greater than 1 hectare.
- 3.6. The Flood Risk vulnerability classification and Flood Zone Compatibility is discussed further in Section 4 of this technical note.

Local Planning Policy

- 3.7. The current West Suffolk Local Plan Local Plan sets out the long term planning and land use policies within West Suffolk. The Local Plan comprises several documents including the Core Strategy and the JDMPD.
- 3.8. The Core Strategy refers to Policy CS2 Sustainable Development.
- 3.9. Part J of Policy CS2 states “*incorporating the principles of sustainable design and construction in accordance with recognised appropriate national standards and codes of practice to cover the following themes..... Surface Water Run-off – incorporating flood prevention and risk management measures, such as sustainable urban drainage.*”

Sustainable Drainage Systems (SuDS) a Local Design Guide

- 3.10. This document by the Suffolk Flood Risk and Management Partnership, dated May 2018, sets the local standards for Suffolk and, together with National Planning Policy, strongly promotes developers to use SuDS to reduce surface water runoff and mitigate flood risk. Relevant (not all) paragraph references and extracts from this document are as follows:

Runoff destination

- 3.11. Generally, the aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:
 - 1. into the ground (infiltration);
 - 2. to a surface water body;
 - 3. to a surface water sewer, highway drain, or another drainage system;
 - 4. to a combined sewer.
- 3.12. Soakage rates need to be above about 5-10 mm/ hr for infiltration to be the sole means of drainage.
- 3.13. Soakage rates for design will need to be reduced by an appropriate factor as set out in CIRIA Report 156 –table 4.6, reproduced below:

CIRIA Report 156 Table 4.6: Consequences of failure

Area drained (sq m)	No damage or inconvenience	Minor inconvenience – eg: flooding of car park	Damage to buildings structures or major inconvenience eg roads
<100	1.5	2	10
100 -1000	1.5	3	10
>1000	1.5	5	10

- 3.14. Suffolk County Council will not normally permit surface water discharges from developments into existing land drains, highway drains or piped watercourses unless they have been constructed to an acceptable standard, have proven adequate capacity and clearly defined maintenance responsibilities. Owners of such drainage will need to agree to connections.
- 3.15. Land Drainage Act consent should be obtained where any works within to a watercourse are to commence.

4. Assessment on Flood Risk

Online Flood Maps – Flood Zone Map

- 4.1. The Environment Agency’s (EA’s) flood risk map below (Figure 3) shows the site as located in Flood Zone 1 ‘Low Probability’ of flooding. In accordance with the NPPF the site is therefore appropriate for the inclusion of residential and commercial development.
- 4.2. Fluvial flooding is typically defined as flooding caused by water in rivers rising above bank levels. The Flood Map for Planning does not map fluvial flood risk from minor watercourses. A minor watercourse crosses the site. However, the “Risk of Flooding from Surface Water” map is considered a reasonable initial indicator of fluvial flood risk from minor watercourses, further details of which are provided within this technical note. The site can be confirmed to be at low risk from fluvial flooding.



Figure 3: EA Flood Zones for Planning

Online Flood Maps – Surface Water

- 4.3. Surface water flooding is flooding caused by heavy rainfall running off land and ponding in areas of low topography as it flows towards a watercourse or land drain.
- 4.4. The Site is at very low risk from surface water flooding, as illustrated within the surface water flood map from the Gov.UK website (Figure 4). There are areas of the site which do show some localised locations at low, risk of surface water flooding, these relate to the low-lying areas adjacent to the east of the site.



Figure 4: EA Risk of Flooding from Surface Water

- 4.5. It is acknowledged within the West Suffolk Local Plan (Regulation 18) Issues and Options dated October 2020, that heavy soils in and around Barrow make the area susceptible to surface water flooding, demonstrated by the number of ponds around the village. This will need to be considered when future sites are developed but is an obstacle that can be overcome.

Online Flood Maps – Reservoir

- 4.6. Figure 5 below, shows an extract of the Flood Risk from Reservoirs. This shows the site is not at risk from reservoir flooding.



Figure 5: EA Risk of Flooding from Reservoir

Groundwater Flooding

- 4.7. Available British Geological Survey (BGS) borehole records in the vicinity of the site were reviewed to provide initial information on potential groundwater levels at the site. There are no BGS boreholes in the vicinity of the site. However, intrusive ground investigation will be undertaken as part of the future planning application to inform the drainage design for the site.

Historical Flooding

- 4.8. The historical flood map from the Environment Agency (EA) shows no recorded flood outlines at the site. The EA, Local Planning Authority (West Suffolk) and the Lead Local Flood Authority (Suffolk County Council) will be consulted as part of any future Flood Risk Assessment at planning stage to obtain further information on flood incidents which may have been recorded.



Figure 6: EA Risk Recorded Flood Outline

Geological Context

- 4.9. The BGS extracts show the site is underlain by Lowestoft Formation, consisting of chalky till, sands gravels, silts and clays. Over a Bedrock of Nodular Chalk formation.
- 4.10. The Soil Association Maps show that the site is underlain by soil type 572q (Ashley).

Table 2: Soil Association type found at site

Soil Type	Coverage	Description	BFIHOST
572q (Milton)	100% of the site	Fine loamy over clay soils with slowly permeable subsoils and slight seasonal waterlogging associated with similar wetter soils. Some calcareous and non-calcareous slowly permeable clayey soils.	0.45

- 4.11. The above geotechnical information within Table 2 suggests that infiltration is unlikely to be viable within the shallower subsoils at the site. However, this assumption will be confirmed through further intrusive ground investigations which will be undertaken to support the site at the planning stage and would also be subject to approvals from statutory consultees.

- 4.12. The site is located within a Source Protection Zone 2 (Figure 7). Therefore, water quality will be addressed by utilising the CIRIA Simple Index Approach regarding surface water quality, to protect the underlying water table. This is consistent with the current EA guidance and the Water Framework Directive (WFD). Additionally, the site is underlain by a secondary (undifferentiated aquifer) and underlain by a principal bedrock aquifer. The vulnerability of the aquifer is considered to be low to Medium.



Figure 5: Groundwater Source Protection Zones

5. Design considerations and Sustainable Surface Water Drainage Strategy Proposals

- 5.1. The proposed surface water drainage strategy for the site will be developed and informed by the existing site constraints and hydrological catchments. The surface water drainage will be carefully developed to address the proposed landscape and visual requirements, identified during the baseline analysis for the project.
- 5.2. The greenfield runoff rate was estimated using the FEH Statistical method based on catchment descriptors for the site. This method resulted in a Q_{BAR} (approximately 1 in 2.3 annual probability event) greenfield runoff rate of 2.4/s/ha (See **Appendix A**). The LLFA will expect this to be applied to the site and will also address the Regulation 18 document regarding surface water flooding within the Barrow area.
- 5.3. It is likely the discharge of surface water flows will be directed, as with the existing situation, to existing land drainage at the site. This will be reviewed and adapted as part of a future surface water drainage strategy for the site.

Surface Water Drainage Vision

- 5.4. It is a requirement of the National Planning Policy Framework (NPPF) that Sustainable Drainage Systems (SuDS) are used in all major developments, if feasible. The LLFA also advocates the use of appropriate SUDS in new development as detailed in the SCC Suffolk Flood Risk and Management Partnership Document 2018. As such, the proposed development will include a comprehensive Sustainable Drainage System (SuDS) and the proposed SuDS will seek to deliver long term mitigation by attenuating and treating the development generated surface water runoff and where possible provide betterment. The SuDS will be designed so they will integrate within the wider landscape proposals and will provide opportunities, where possible, to enhance biodiversity and recreation facilities.
- 5.5. At this stage it is anticipated the SuDS features proposed at the site will be used within the development. Moreover, the design and the integration of proposed SuDS features within the wider landscape strategy and proposals will be carefully considered as part of the masterplanning process and shall themselves, provide an element of Public Open Space use. The topography of the site and outfalls to the existing land drains may direct more dispersed and shallow attenuation features throughout the development but this will be reviewed as part of a future drainage strategy for the site.
- 5.6. Where any established landscaping exists, this will be retained where needed and enhanced where possible. Therefore, the SuDS proposals shall be designed so that they enhance and support the landscape proposals going forward.
- 5.7. As well as providing a drainage function, the SuDS will also form an important part of the project's biodiversity strategy. The proposed SuDS features will be designed so that they maximise opportunities for habitat creation and wildlife.
- 5.8. The prevailing surface water strategy to be adopted is a network of positive drainage, where feasible consisting of and not limited to:
- Open swales / rills, that can be effectively integrated into the landscape / streetscape and be wet, dry, or for storage purposes.
 - Attenuation Basins, which will be designed to hold back stormwater to prolong the event and reduce peak flows, then slowly release flows into the system. They are multifunctional features that can additionally be used for community spaces and increase amenity and biological value;
 - Porous Paving, to allow water to infiltrate into the ground (where feasible) to feed into groundwater aquifers or can be lined to aid water quality treatment and reduce runoff intensity into the drainage system;
 - Bio-retention areas, included in development areas and strategic landscaping areas. Planting effectively provides benefits to the communities through amenity, biodiversity and water quality treatment.
- 5.9. Upstream on plot drainage solutions such as bio-retention planters, rainwater gardens and permeable paving could also provide pre-treatment for runoff from hard standing surfaces such a parking area. Roof runoff where feasible will either drop directly into a piped drainage network, on plot rills, or rainwater gardens before discharging to the strategic attenuation areas. Green roofs will be explored for the commercial units.
- 5.10. Discussions will be undertaken with the approving authorities so that the proposed SuDS are designed in accordance with best practice and maintenance adoption is conserved as part of the design process.

- 5.11. Piped networks may still be utilised in areas based on the LLFA, Highways and Sewerage undertaker adoption requirements.

Attenuation Storage Requirements

- 5.12. WinDes Quick Storage Estimates have been undertaken to provide an indication of the volume of storage that would likely be required on site to provide the necessary attenuation based upon rainfall events up to the 1% (1 in 100) annual probability event plus, an additional allowance of 20% and 40% on rainfall intensity, which is to account for the potential impacts of climate change. The climate change allowance is based on the latest Environment Agency *Flood Risk Assessments: Climate Change Allowances* (February 2016, updated Dec 2019).
- 5.13. The proposed final developable area for the future works is not yet known as this is a high-level review in support of the local plan promotion stage. Therefore, the amount of storage approximately required for every 1ha of impermeable area has been calculated to be approximately 970m³ per hectare (ha) (see calculations in **Appendix B**).
- 5.14. This is based on the site applicable greenfield Q_{BAR} runoff rate of 2.4 l/s/ha (see calculations in **Appendix A**).
- 5.15. The calculations are only approximate estimates which can only be used at this high-level stage. It is anticipated this storage will be supported with more dispersed storage once a masterplan is progressed in the planning stages.
- 5.16. The maximum stored water depth to achieve a gravity outfall will also need to be confirmed at planning stage requiring a review of survey data of the local land drainage network.
- 5.17. The size of any proposed attenuation features will be affected by earthworks that may take place as part of the development proposals and further drainage modelling.

Exceedance

- 5.18. To demonstrate that in an exceedance event any flooding does not negatively affect the development or offsite areas, flows up to the 1 in 100 (1%) annual probability plus climate change rainfall event will be managed and contained onsite. Furthermore, the attenuation will be designed to accommodate surface water runoff with no flooding for all events up to and including the 1 in 100 (1%) annual probability plus 40% climate change event.

Water Quality and Pollution Control

- 5.19. Appropriate pollution control measures must be included in the surface water drainage system to minimise the risk of contamination or pollution entering the receiving watercourse/ sewers or aquifer from surface water runoff from the development.
- 5.20. The drainage system will be designed to comply with the requirements of the SuDS treatment train as laid out in CIRIA C753 'The SuDS Manual', described as the 'Simple Index' Approach, in addition to the requirements of stakeholders.
- 5.21. A SuDS treatment train will be applied for each catchment whereby runoff passes through a variety of SuDS techniques to control volumes of runoff and reduce pollution before discharge to the watercourse.
- 5.22. The treatment of surface water runoff will be designed so that it meets the requirements of the Water Framework Directive (WFD) with not detriment to the receiving watercourses.

6. Conclusion and Recommendations

- 6.1. Land at Barrow Hill, Barrow, Suffolk presents an opportunity to deliver strategic growth without causing a detriment to flood risk. The site provides the opportunity to deliver sustainable growth considering the following:

- The site is located within Flood Zone 1 of the “Flood Map for Planning”, which is appropriate for all types of development.
- The site is located in an area of very low to low, risk of surface water flooding.
- The site has the potential to support a range of sustainable measures to manage and control surface water run-off, with the view to deliver an integrated Sustainable Drainage System (SuDS). These features will be fully joined up with ecology/habitat areas, green infrastructure, and public open space. Rather than creating simple functional ‘drainage features’, this integrated approach will contribute to habitat creation and enhance biodiversity, provide multi-functional amenity space, and preserve water quality.
- The SuDS will mean there is no increase in discharge rates from the site but also will improve water quality discharge, using the principles of the Simple Index Approach from the SuDS Manual. These features will be integrated within the wider landscape proposals for the site and will therefore provide an opportunity to support net biodiversity gains or re-naturalisation initiatives, which will be of benefit for the wider community.
- It is estimated attenuation storage in the order of 970m³ per impermeable hectare could be required to attenuate runoff during the 1 in 100 annual probability plus 40% climate change prior to discharge.
- The proposed SuDS, discharge rates and outfall locations will be discussed with approving authorities and

6.2. Overall the site is well positioned to deliver housing needs without increased flood risk to offsite areas but also offers the opportunity for environmental enhancement through the introduction of a variety of SuDS.

6.3. The development will meet the requirements of both national and regional planning policy.

	Name	Position	Date
Prepared by:	Various		03/12/2020
Reviewed by:	██████████	Associate	03/12/2020
Approved by:	██████████	Director	03/13/2020

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Appendix A

Appendix B



Landscape Statement

**Development of land
East of Barrow Road, Barrow, Bury St. Edmunds, Suffolk**

On Behalf of:



December 2020

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Document Ref	20015 – LS
Author	Lisa Finch CMLI
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Landscape Statement

Development of Land east of Barrow Road, Barrow, Bury St. Edmunds

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Figure 2:	Site Analysis
Figure 3:	Location of Representative Views
Figures 4-10:	Representative Views
Drawing 20015-101:	Landscape Masterplan

Appendices

Appendix 1:	Sources of Information
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1.0 Introduction

Introduction

- 1.1** Southern Ecological Solutions (SES) has been instructed by 29 Architecture Ltd to prepare a Landscape Statement to support the land allocation for the West Suffolk Local Plan (Regulation 18) Issues and Options October 2020 for land to the east of Barrow Road, Barrow, Bury St. Edmunds, Suffolk as previously identified (WS010/WS014)
- 1.2** The area comprises part of two arable fields to the east of the village with adjacent existing housing (with some currently under construction to the west of the Site). The south western parcel of the site comprises some existing industrial buildings and a mid C20th bungalow where the site adjoins Barrow Road.

Planning History

- 1.3** The parcel of land is identified within the West Suffolk Council SHELAA 'included housing' plan and is labelled WS010. This plan includes several other sites around the village.
- 1.4** The parcel of land directly to the west of the site, also included within the SHELAA (WS014) is currently under construction by Hopkins Homes Ltd. The south western corner of the site is currently in industrial use with associated buildings, together with an adjacent bungalow fronting onto Barrow Road.
- 1.5** Other Sites included within the SHELAA are:

Although these sites have not been surveyed in detail, their overall characteristics are considered to be:

WS011 – Sits to the north of the Site directly behind properties along Bury Road. This large parcel of land is less well related to existing development, protrudes awkwardly into the open landscape and is visible from the east without the screening of the woodland. This site is likely to be seen from the eastern gateway into the village.

WS012a – Sits to the south west of the village and would form an important gateway feature which would not be in character with the settlement. Visually, this site is not well screened, forming a major part of the views from the south and west and would encourage coalescence of settlements.

WS013 – A small site to the north of the village, which although sitting reasonably well within the existing settlement, would have very little space for Public Open Space and social housing within its boundaries.

WS09 – A small site to the eastern extent of the village forming ribbon development on the important eastern gateway to the village.

WS228 – A small parcel of land which would be visible from the southern route into the village, forming the southern gateway. This is unlikely to be in character with the settlement.

WS008 - a very small parcel of land to the west of the village. Encouraging coalescence between settlements.

Current Proposal

- 1.6** The proposal is for the construction of a mix of approximately 120 new dwellings, including policy-compliant affordable housing units. In addition, an area of at least 1 hectare is proposed for commercial use. The application includes a new access road onto Barrow Hill and the extension of the existing cycleway.
- 1.7** The purpose of this Landscape Statement is to provide a review of the landscape and visual constraints and opportunities of the site and to support the inclusion of the site as an allocation in the emerging West Suffolk Local Plan.
- 1.8** The assessment was undertaken by Chartered Landscape Architect, Lisa Finch CMLI. It was prepared following a desk-based study of information including OS Maps, Aerial Images and published reports, alongside adopted and emerging planning policy. A full list of information is provided in **Appendix 1**. A site visit and visual survey was undertaken on 1st December 2020.

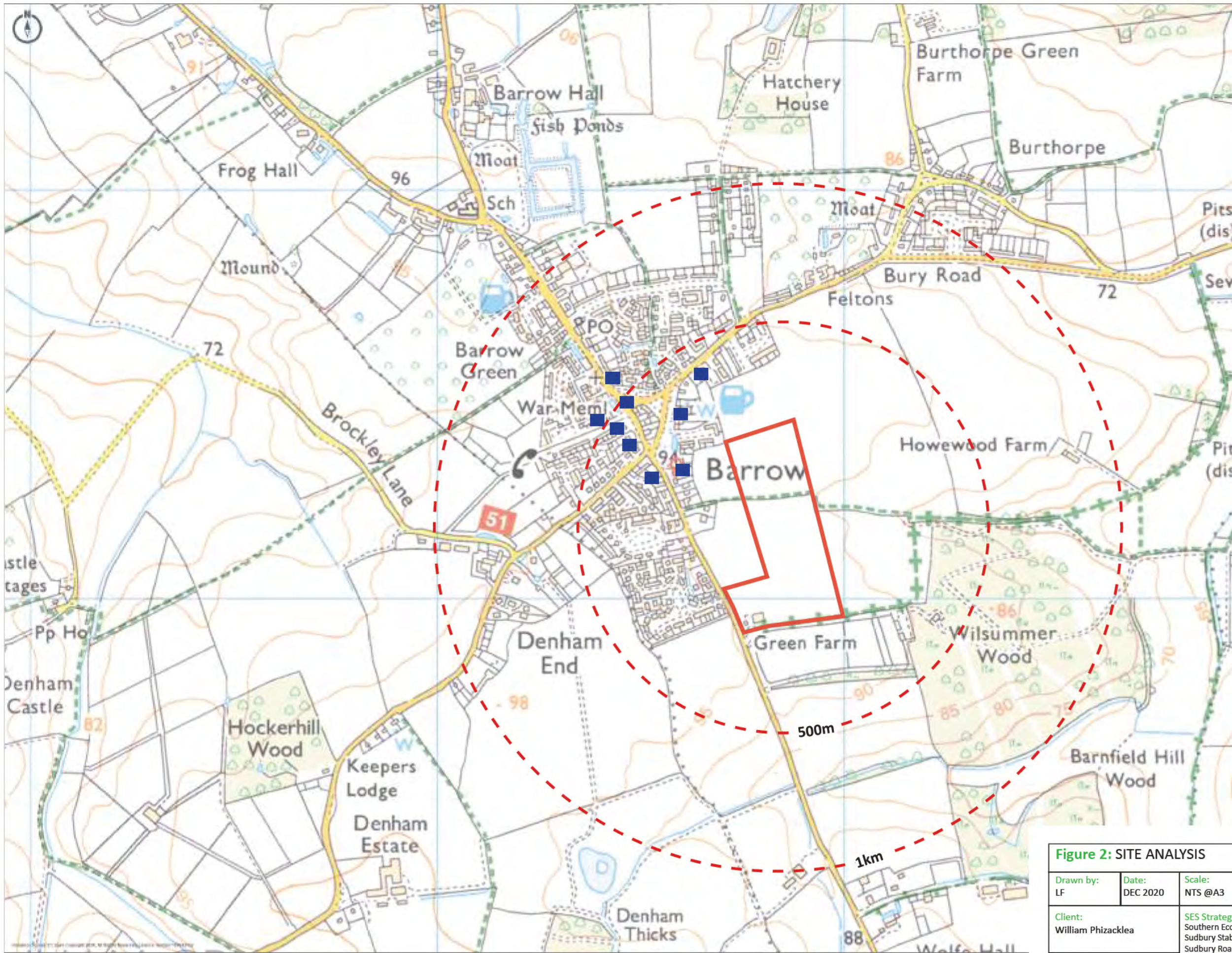
Site and Study Area

- 1.9** The location of the site and study area is shown on **Figure 1**.
- 1.10** The village of Barrow lies approximately 8.5km west of Bury St. Edmunds with Gazeley approximately 4km and Kentford approximately 6km to the north east. Barrow lies 2.5km south of the A14 providing road links to Cambridge, Bury St Edmunds, Ipswich, and Newmarket.
- 1.11** The centre of the village is set around Barrow Green with development extending along the access routes including Bury Road, Barrow Hill, Colethorpe Hill and Barrow Road creating spurs off the central core.
- 1.12** The study area extends to 1km from the centre of the site. Barrow sits predominantly at 95m AOD with land falling away to the north adjacent to the A14 at 65m AOD. The land falls away immediately to the south of the village before rising up to a ridge again beyond Wolfe Hall.
- 1.13** The area is generally undulating and well-treed providing an interesting and pleasant landscape.

2 Site Description

Site Boundary

- 2.1** The site is identified as WS010 within West Suffolk Council SHELAA and includes part of WS014 (part of which is currently under construction) to the south west.







- KEY**
-  THE SITE
 -  500m SURVEY DISTANCE FROM CENTRE OF SITE
 -  ASSESSMENT AREA
 -  GRADE II LISTED BUILDINGS

Figure 2: SITE ANALYSIS

Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
Client: William Phizacklea		SES Strategic Southern Ecological Solutions Sudbury Stables Sudbury Road Downham, Essex CM11 1LB	
Site: Land east of Barrow Hill, Barrow		Tel: 01268 711021 team@ses-eco.co.uk	





KEY

	THE SITE
	VIEWS INTO SITE
	DISTANT/PARTIAL VIEWS
	FOOTPATH
	BYWAY

Figure 2: SITE ANALYSIS

Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
Client: William Phizacklea		SES Strategic Southern Ecological Solutions Sudbury Stables Sudbury Road Downham, Essex CM11 1LB	
Site: Land east of Barrow Hill, Barrow		Tel: 01268 711021 team@ses-eco.co.uk	



- 2.2** The Site lies to the south east of the centre of Barrow Green and East of Barrow Hill, predominantly beyond existing development under construction. The site broadly rectangular in shape with an additional area to the west adjoining Barrow Hill and extends to approximately 8.6ha (see **Figure 2**) with access via a private drive from Barrow Hill. The area is bordered to the east, north and south by farmland with new development (under construction) to the west between the Site and Barrow Hill. An existing industrial area exists to the west of the site adjacent to Barrow Hill. The wider area comprises open countryside.

Landform

- 2.3** The village of Barrow lies on a ridge of high land which falls away to the north, east and south (approximately 95 AOD). Land rises slightly to the west before falling away towards Dalham, Dalham Hall sitting at some 105m AOD. Land falls away south of the Site quite sharply down to the valley before rising steeply again towards Hargrave to the south. The Bury Road to the north of the site falls away and is hidden behind the high intervening ground as it travels east.
- 2.4** The site itself is predominantly level falling gently away to the east towards Wilsummer Wood.

Access

- 2.5** The site, which is in private ownership, is currently accessible to agricultural machinery only. Part of the Site; the western section abutting Barrow Hill, is currently used for industrial purposes and the area north of this forms part of access routes for the development under construction. The proposed access is directly off Barrow Hill, north of the existing industrial units.
- 2.6** Byway 22 runs along the southern boundary off the Site, joining Barrow Hill to Wilsummer Wood to the east. This byway then continues north and east where it joins the Bury Road to the east of the village of Barrow. Footpath 22 runs east west directly through the Site joining Barrow Hill to the Byway 22. This footpath runs through a section of the adjoining development, along the existing hedge and ditch line and joins the Byway to the east of the Site, creating a circular walk around the Site (and the arable field beyond to the east).

Land Use and Vegetation

- 2.7** The site is predominantly under arable production (currently fallow as at the time of the site survey). To the south west of the Site, where it joins Barrow Road, lies a small existing industrial area and a temporary access/storage area for the adjacent residential development under construction (Hopkins Homes).
- 2.8** A good quality mixed native hedgerow forms the southern boundary of the Site with a short section of scrub to the south west forming an enclosed drove style route before opening up into the main field. Limited, relatively poor-quality vegetation forms a weak boundary to the west of the Site adjacent to Barrow Hill.
- 2.9** The existing development under construction abuts the Site with a 'hard' built edge to the majority of its north/south length.

- 2.10** Across the Site, running east/west and adjacent to the existing Footpath 12, a moderately poor-quality hedge extends the width of the Site. This hedgerow comprises predominantly elm, field maple, dogwood, hazel, hawthorn, blackthorn and dog rose. Some hedgerow trees exist, being mostly Ash with one dead (field maple) tree. The hedge is outgrown, and the elm is at a height susceptible to Dutch Elm beetle. The hedge currently provides good ecological and visual value to the landscape. Adjacent to this hedgerow, runs an existing ditch which, at the time of survey, contained some water.
- 2.11** There is a short section of hedgerow that runs north/south to the eastern boundary of the Site. Again, this is relatively poor quality with abundant ivy cladding the trees but provides reasonable ecological and visual value.
- 2.12** The northern boundary of the Site cuts across existing arable land. Further north, beyond an area of open farmland, sit residential dwellings accessed off Bury Road.
- 2.13** The eastern boundary is open farmland to all, but the short section of hedgerow mentioned above.
- 2.14** No previous uses of the Site are evident. Historical mapping (OS 1884) shows narrow stretches of woodland running along Byway 22 both extending to Wilsummer Wood.

3 Landscape Context

- 3.1** The following section summarises the landscape character of the area, identifying features of value both within and adjoining the site. The visibility to and from the site is also described. This assessment, and subsequently analysis, has been used to inform the landscape strategy for the development.
- 3.2** The landscape designations within and immediately adjacent to the site are shown on the site plan **Figure 2**. Other designations within the wider study area are included for reference in **Appendix 2** with areas of ecological value at the national and county level identified in the accompanying Ecological Assessment (SES, September 2018).

Landscape Designations

Scheduled Monuments

- The moated site and associated fishpond to the south east of Barrow Hall (Scheduled Monument) lies to the north of the village;

There are a number of Listed Buildings in and around Barrow. Grade II Listed Buildings in closest proximity to the site include:

- 12 Barrow Hill;
- Barrow House and Carriage Gateway, Bury Road;
- 2 Denham Lane;
- and the Weeping Willow Public House, Bury Road;

County Wildlife Sites within the surrounding area include:

- Wilsummer Wood (750m south east);
- Barnfield Hill Wood (1km south east);
- Denham Thicks (1.2km south west);
- Hockerhill Wood (1km south west) and
- Great Papely Wood (1.6km north east)

These sites are protected under policies DM10, DM11 and DM12 of the Joint Development Management Policies Document.

There are two Special Landscape Areas (SLA).

- The Horringer/South of Bury SLA lies 1.5km to the east
- Barrow SLA lies 1km to the west.

SLAs continue to be protected under Policy DM13 of the Joint Development Management Policies Document as the Core Strategy states that the Suffolk LCA does not provide sufficient detail at the borough level to form the basis for the replacement of SLAs.

- 3.3** The area also incorporates a number of public rights of way (PRoW). The footpaths through and adjacent to the site (PRoW 3,11,12,13, 21 and 22_) are part of the interconnected network of recreational routes around the fringes of Barrow connecting the village to the surrounding countryside

Planning Policy

- 3.4** The former St. Edmundsbury Borough Council formally adopted the Bury St. Edmunds, Haverhill and Rural Area Vision 2031 site allocation documents in September 2014. These documents will be replaced by the new West Suffolk Local Plan upon adoption.

The vision states that any development would also need to comply with the relevant policies of The Joint Development Management Policies document (adopted February 2015) and the submitted/adopted Development Brief.

It also states that all development within the Borough should meet the requirements of Core Strategy policies CS2 and CS3 including the protection and enhancement of natural resources (including landscape character, the historic environment and biodiversity), sustainable design and by making a positive contribution to local distinctiveness, character, townscape and the setting of settlements.

- 3.5** 7.7 of Policy CS4 details villages which have been identified as Key Service Centres of which Barrow is one, recognised for its good accessibility to Bury St. Edmunds and a range of local services and facilities.

'Key Service Centres

Barrow

7.10 Barrow is one of the smaller Key Service Centres but is close to Bury St Edmunds for access to employment and a wide range of services. The village enjoys a good range of services and

the compact nature of the settlement provides the opportunity for housing growth to be located within walking distance of all the services and amenities.

7.11 Proposals for growth will need to be sensitive to the proximity of the adjacent settlement of Denham, and care will be needed to avoid coalescence. Depending on the scale, planned growth will require additional or enhanced and expanded services such as GPs, a dentist, and expanded (or new) primary school, sports pitches and open spaces. These requirements will be detailed in the Rural Site Allocations DPD.

7.12 Barrow is a vibrant village and provides a well serviced centre where appropriate and well-designed growth that has regard to local conditions, such as flooding, through the plan period will support and strengthen the range and choice of services and facilities and the contribute to the community life and character of the village.'

- 3.6** The adjacent site to the west of the proposed site was allocated by the Rural Vision 2031 under Policy RV10(b) as a residential allocation. An ecological assessment for this site identified an important hedgerow, running east to west across the northern part of the site, which should be retained and enhanced. Its connectivity with Wilsummer Wood County Wildlife Site, which lies 450m to the east should also be retained.
- 3.7** To the west of Barrow Hill, a residential development of 80 dwellings has been completed. This former greenfield site, known as Grove Park, was approved for development in 2013 after being allocated for development under Policy RV10(c).
- 3.8** West Suffolk SHELAA 2020 identified the proposed site as WS010, together with the southern part of WS014 (1.07ha) – Land to the East of Barrow Hill following the call for sites in 2018. The site was acknowledged as having no significant constraints but suggested the need for further ecological, heritage and landscape surveys. The Site is also within the designated area of the Neighbourhood Plan and considered to provide 193 units within 6-10 years of the allocation; it being for mixed use, residential, commercial and public open space. WS010 comprises 8.52 ha of arable land.
- 3.9** WS014 has been partially built out having received outline planning consent in August 2017 (from a total of 5.06ha) and was designated as residential development land with a yield of 75 dwellings including 1ha of B1 and B8 employment land. Reserved matters planning permission was granted DC/16/0300/OUT and DC/18/0693/RM Development commenced February 2019. The southern extent of the site is included within the current representation.
- 3.10** West Suffolk Council is currently updating its planning policy, and replacing the existing separate development plans for the former districts of Forest Heath and St Edmundsbury with a comprehensive plan covering the new local authority area of West Suffolk. This document supports the representations for land identified to be put forward to the new Local Plan under the West Suffolk Local Plan (Regulation 18) Issues and Options October 2020

Landscape Character

National

- 3.11** At the National Level, the study area lies on the northern edge of the South Suffolk and North Essex Claylands National Character Area (NCA 86).¹ To the north lies Breckland (NCA 85) and to the west lies East Anglian Chalk (NCA 87).² South Suffolk and North Essex Claylands comprises a broadly flat, chalky, boulder clay plateau dissected by an undulating river valley topography. The land use is predominantly arable with a wooded appearance with a dense pattern of farms and small settlements typically arranged around ‘tyes’ or greens.

Regional

- 3.12** At the regional level (East of England Landscape Typology, Landscape East), the area around Barrow comprises three landscape character types. Barrow, including its immediate environs lies in the Wooded Village Farmlands with the Wooded Plateau Farmlands immediately to the south. The elevated areas are separated by the Chalk Hills and Scarps landscape character type, which follows the river valleys to the north, west and east of the settlement.
- 3.13** The Wooded Village Farmlands comprises a gently rolling, elevated arable landscape drained by minor streams, with ancient woodland blocks and small, nuclear villages often arranged around a central village green. It is a typically open landscape with long distance views, although woodland contains views particularly around settlements. The Wooded Plateau Farmlands similarly comprise a settled, but earlier enclosed arable landscape with frequent ancient woods, associated with a rolling, in places undulating, glacial plateau dissected by numerous shallow valleys. The valleys of the Chalk Hills and Scarps comprise generally open late enclosure fields with permanent pasture and woodland on steeper slopes and a low density of settlement. The free draining land creates frequent dry valleys, some of which contain small seasonal watercourses that are not often visually obvious.
- 3.14** Historically the landscape was sparsely settled with scattered villages associated with commons and areas of wood pasture. Today, settlement is expanding with a central core of historic dwellings spreading to more recent development out to existing farmsteads.
- 3.15** The national assessment identifies Statements of Environmental Opportunity to offer guidance on key landscape issues. Those aspects relevant to this assessment include:
- SEO 2:**
- *‘Restoring traditional orchards, once a feature of many settlements, which contribute to the area’s sense of place and genetic diversity.*
 - *Conserving, managing and replanting hedgerows, especially those that are ancient and species rich, in a manner consistent with the historical patterns, particularly in areas that will help to regulate soil erosion.*

¹ National Character Profile: 86 South Suffolk and North Essex Claylands), Natural England, July 2013
<http://publications.naturalengland.org.uk/publication/4721112340496384?category=587130>

² Landscape East Landscape Typology and Integrated Landscape Character Objectives, Landscape East, November 2010

- *Encouraging the planting of characteristic hedgerow trees from existing hedgerow stocks; that is, oak in Suffolk and field maple and hornbeam in Essex. This will enhance landscape diversity and ecosystem services, including carbon storage. It will also help to counteract the threats to landscape character and biodiversity from tree diseases such as ash die-back. SEO 2: Protect and enhance the area's ancient woodland cover, parkland trees, river valley plantations and ancient hedgerows, through the management of existing woods and the planting of new woods, hedgerows and hedgerow trees to benefit landscape character, habitat connectivity and a range of ecosystem services, including timber provision, the regulation of soil erosion and the strengthening of the sense of place and history.*
- *Protecting ancient hedgerow pollards, which are an important habitat for saproxylic beetles and hole nesting birds.*
- *Ensuring that new hedgerow planting on the plateau does not block important views and overly enclose the landscape. Planting characteristic species mixes will support biodiversity and landscape character and should include hawthorn, blackthorn, hazel, field maple, dogwood, spindle and small-leaved lime (derived from woodland).*
- *Extending and linking woodland sites, including orchards, through the expansion and enhancement of semi-natural linear features such as hedgebanks, streams, sunken hedged lanes, grass verges and farm woodlands, enhancing biodiversity and landscape character.'*

3.16 This is reinforced at the regional level where the key integrated objectives include:

- *'Restoring, managing and enhancing the characteristic woodland cover in the landscape - by bringing woodlands into management, increasing woodland cover, promoting woodland creation using locally native species and the management of in-field and hedgerow trees.*
- *Planning for and managing the impact of existing settlement and proposed growth including recreation needs - by managing the impact of proposed development on views from the hills and ridges, planning for increased recreation in the countryside through the creation of green infrastructure, and conserving and restoring key historic environment characteristics and features.*
- *Protecting, managing, planning for and promoting character and diversity in the countryside - by protecting and managing historic fields and boundary patterns such as species-rich hedgerows, semi-natural habitats, and the quality and character of rivers and streams.'*

County

3.17 At the county level (Suffolk Landscape Character Assessment (LCA), Suffolk County Council)³, the landscape character types broadly correspond with those defined at the regional level. Barrow (including the site) lies within the Plateau Estate Farmlands, with the Undulating

³ Suffolk Landscape Character Assessment. Suffolk County Council

Estate Farmlands to the south and south east and the Wooded Chalk Slopes corresponding with the shallow tributary river valleys between Denham and Kentford and Hargrave and Barrow Heath.

- 3.18** Within the Suffolk LCA, the area around Barrow is particularly noted for its extensive woodland cover (including ancient woodland) and the strong estate character and influence of Ickworth Park. This contributes to the general sense of enclosure, although there are some long-distance views. Overall the area is in a reasonable condition, although some areas are influenced by the growth of villages (including suburban development) and field patterns have been modified by 20th century agricultural improvement.
- 3.19** Expansion of existing settlements and the creation of new settlement patterns are highlighted as potential key forces for change within the landscape; however, the guidance for the Plateau Estate Farmland notes that due to the extent of existing settlement and landcover/tree cover patterns, in terms of both visual and landscape character, there is some capacity for settlement expansion. Where development occurs, it is important to integrate the settlement edge into the surrounding rural and sparsely settled countryside to minimise any wider impact. The settlement pattern has a strong tendency towards clustered villages surrounded by a scattering of individual farmsteads. Wherever possible this clear distinction should be maintained.
- 3.20** These guidelines are reflected in those for the Undulating Estate Farmlands, which note the tendency of parishes to comprise multiple settlement clusters of varying size. The release of land, should where possible, reflect the local pattern. Where vernacular styles and detailing are used, the character should reflect the immediate locality of the specific cluster in which the development is proposed.
- 3.21** Developments should not encroach on to the river valley sides to ensure no landscape or visual impact on the adjacent character type.
- 3.22** Land management guidelines for the Plateau Estate Farmland include reinforcing the historic pattern of field boundaries; restoring the quality of hedges and hedgerow trees through appropriate management; and restoring, maintaining and enhancing the network of tree belts and small plantations found across much of the landscape type. In addition, the land management guidelines for the Undulating Estate Farmlands include maintaining and restoring greens and commons and ponds within the landscape.
- 3.23** The village of Barrow follows a nucleated settlement pattern, with development focussed around the central village green. The subsidiary settlement of Burthorpe lies to the east, with Denham End to the south west. The settlement contains a range of older properties around the green, Barrow Street and Bury Road, Barrow; Denham End; and Burthorpe. Traditional vernacular materials include timber frame and painted render, red brick and occasional flint and brick, with a mix of slate and pantile roofs. The majority of development within the village has occurred since the 1960/70's. Modern estates and cul-de-sacs have limited reference to the local vernacular styles or materials, with a range of brick (red, brown and buff) and render.

Green Infrastructure

3.24 Green Infrastructure (GI) is defined as ‘a network of multi-functional green space, both new and existing, rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities.’ The GI Strategy for the Borough (St. Edmundsbury Green Infrastructure Strategy, St. Edmundsbury Borough Council, September 2009) sets out the key considerations and vision for GI including the protection and enhancement of existing GI assets (biodiversity, cultural and landscape) and the provision of new GI in advance of and in association with future growth. The GI strategy includes the identification of broad principles alongside a number of ‘action zones’ and projects to focus GI planning.

3.25 Key broad principles for all GI relevant to the site include:

- Taking into account the key characteristics identified in the Suffolk Landscape Character Assessment
- Conserving existing landscape features e.g. trees and hedgerows and making provision for the reinstatement or restoration of lost landscape features;
- Preparing management plans to protect and enhance landscape features and enhance biodiversity;
- Conserving topographical features and key views or visual relationships identified within the LCA;
- On settlement edges, new development should deliver landscape enhancement and restoration in the form of landscape structure to provide landscape and visual mitigation and physical and visual connections;
- Creating new wildlife corridors and links;
- Creating potential accessible areas of habitat;
- Make use of native plants in landscape works and green space proposals; and
- Incorporate sustainable drainage, with opportunities for landscape and biodiversity enhancement.

3.26 Barrow lies within GI Action Zone F ‘Historic Parkland and Woodland’ that surrounds Bury St. Edmunds. The vision for the area includes a strong estate parkland character incorporating a network of managed woodland. The land to the east of Barrow forms part of the Saxhams Woodland Enhancement Corridor. The key emphasis for this action zone includes:

- The restoration of the field boundary network;
- The creation of woodland forming woodland corridors, connecting and linking existing clusters of ancient woodland; and

- Maintaining existing Rights of Way, with new connections to the Lark and Linnet river valley corridors.

3.27 The GI Strategy promotes landscape character enhancements south of Bury St. Edmunds (Project F2). The proposals include enhancing the wooded character, and delivery of significant biodiversity gains through greater connectivity and complementing the setting of Ickworth Park.

Views

3.28 The location of the site together with the surrounding topography and vegetation allows a variety of both enclosed and open views.

Site Views

3.29 From within the site, the views are predominantly to the north and east, the dense hedgerow to the south obscuring views down the valley. To the west, new development has obscured most distant views with some remaining to the south west. To the east, the Site looks out over Wilsummer Wood and the undulating landscape to the north east, whilst limited views to the north reach just beyond the Bury Road.

Visual Envelope

3.31 Such views from the site provide an indication of the potential visual envelope in which the site and the proposed redevelopment may be seen. Selected views from within these areas are shown on **Figure 3**, with photographs demonstrating the extent of visibility of the site provided in **Views 1 – 16** on **Figures 4-10**. As the nature and extent of existing views and visual amenity changes throughout the visual envelope, these photographs illustrate the range of views that may be experienced. Photographs are representative of those experienced and as such should not be considered a substitute for visiting the location in the field.

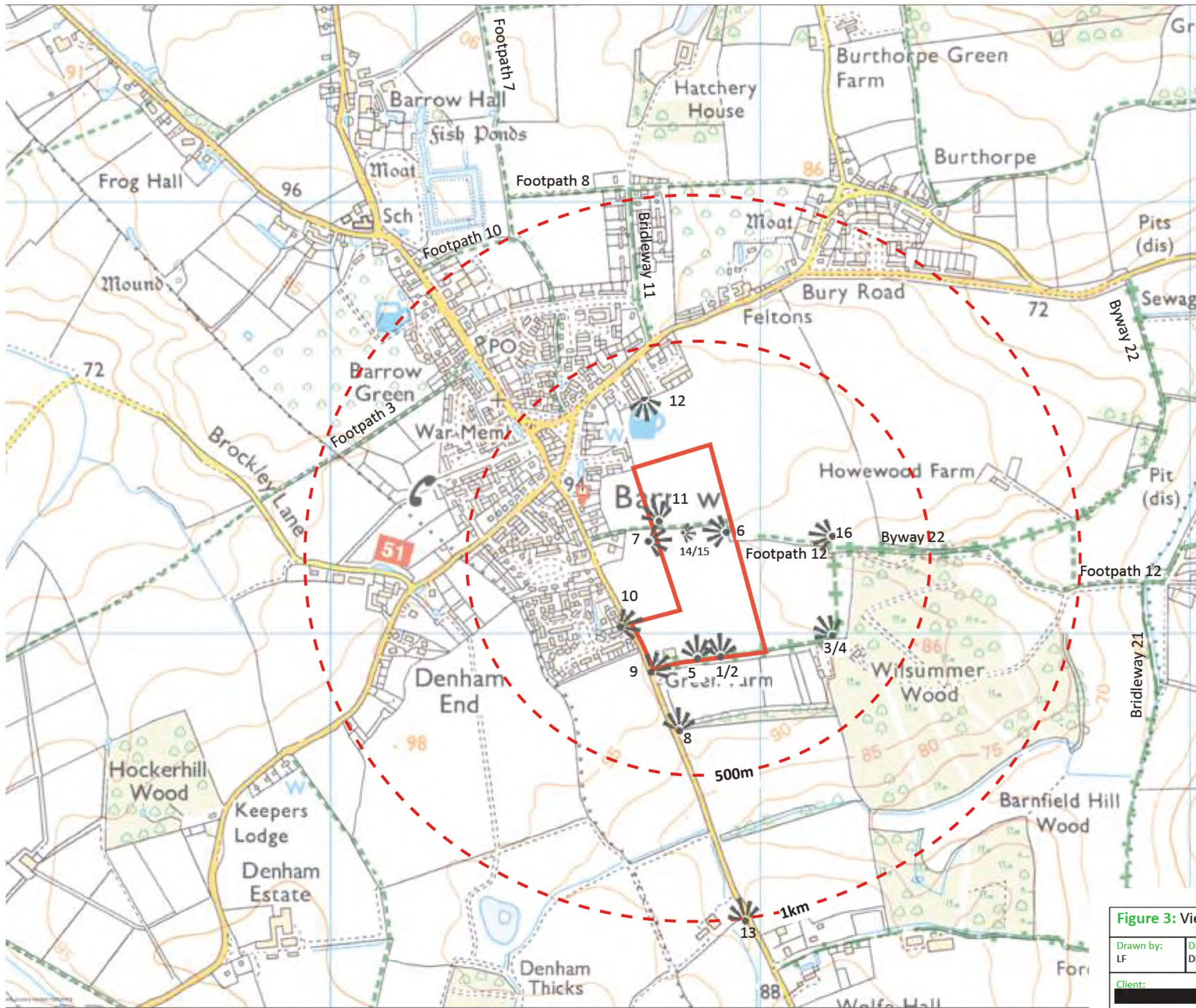
3.32 All photographs were taken in winter in cloudy but clear conditions and represent the worst-case scenario in terms of vegetation cover. Views will be more slightly closed in winter when the deciduous vegetation is in full leaf, however, the coniferous trees to the south will maintain a level of cover.

Public Rights of Way

3.33 **Views 1-5** are located on Byway 22 that runs to the south of the Site and around beyond its eastern perimeter.

3.34 **View 1** and **2** show the extent of the across some of the arable field. The short section of hedge running north/south is evident, being the extent of the eastern boundary. This view does not show the area of development beyond the existing hedgerow that runs east/west through the site from Barrow Hill to Wilsummer Wood. The view is impacted by new development (Hopkins) adjacent to Barrow Hill. It is notable that development, although not complete or planted, closely abuts the eastern boundary of its site with a very hard edge.

3.35 **Views 3** and **4** show the Site from further along the Byway towards Wilsummer Wood, again showing the extent of the new development under construction. In addition to this, the



KEY





-  THE SITE
-  SURVEY DISTANCE FROM CENTRE OF SITE
-  ASSESSMENT AREA
-  VIEWPOINT AND GENERAL DIRECTION OF VIEW

Figure 3: Views and visual envelope

Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
Client: [REDACTED]		SES Strategic Southern Ecological Solutions Sudbury Stables Sudbury Road Downham, Essex CM11 1LB	
Site: Land east of Barrow Hill, Barrow		Tel: 01268 711021 team@ses-eco.co.uk	





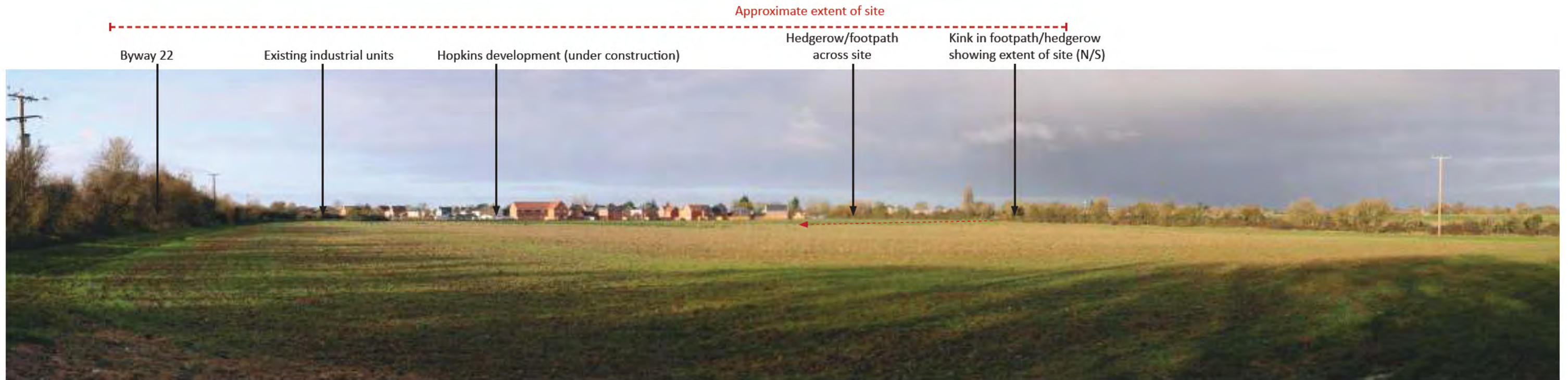
View 1: Looking west from within the Site on Byway 22



View 2: Looking north from the same point along Byway 22

Figure 4: Views 1 and 2			
Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
Client: [REDACTED]	SES Strategic Southern Ecological Solutions Sudbury Stables Sudbury Road Downham, Essex CM11 1LB		
Site: Land east of Barrow Hill, Barrow	Tel: 01268 711021 team@ses-eco.co.uk		





View 3: Looking west/northwest from Byway 22 from the corner towards Welsummer Wood

Approximate extent of site beyond hedgerow



View 4: Looking northwest on Byway 22

Figure 5: Views 3 and 4			
Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
Client: [REDACTED]	SES Strategic Southern Ecological Solutions Sudbury Stables Sudbury Road Downham, Essex CM11 1LB		
Site: Land east of Barrow Hill, Barrow	Tel: 01268 711021 team@ses-eco.co.uk		





View 5: Looking north into site where Byway 22 joins the field



View 6: Looking southeast through existing hedge that crosses site (E/W)

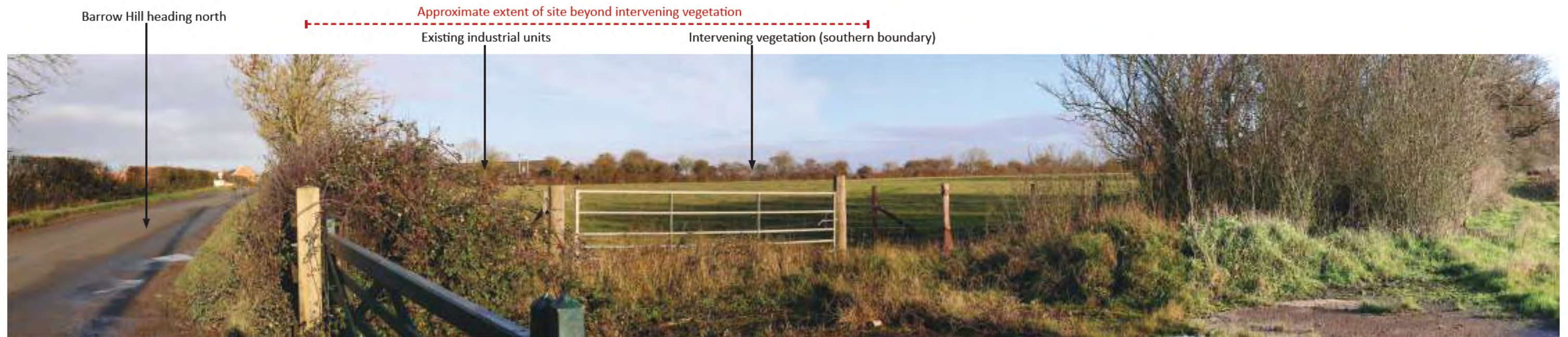
Figure 6: Views 5 and 6

Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
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View 7: Looking south and east from footpath 12



View 8: View looking north along Barrow Hill

Figure 7: Views 7 and 8			
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View 9: Looking north along Barrow Hill with proposed site to the east with existing industrial area and Hopkins development obscured



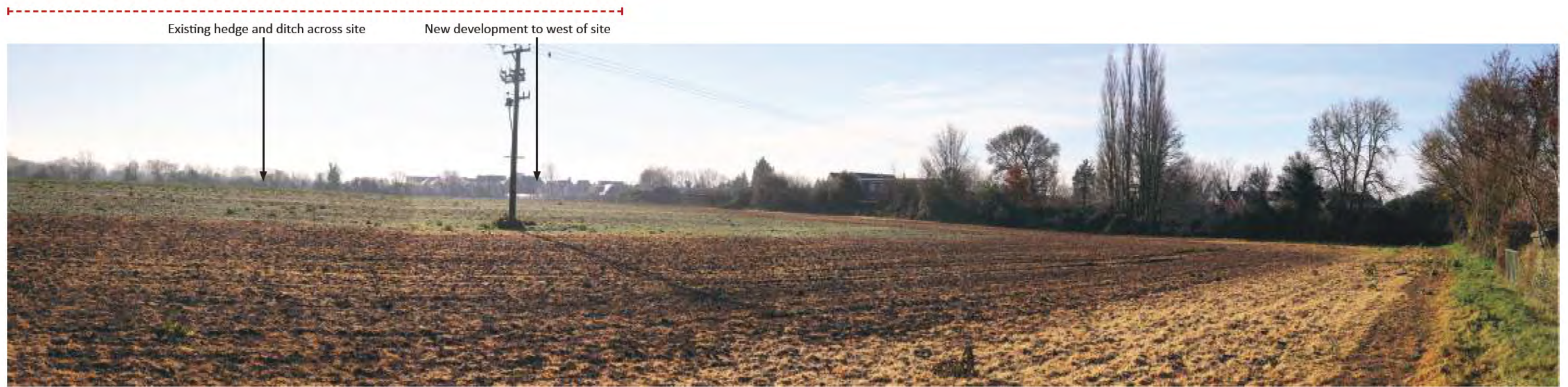
View 10: Looking east from the entrance to Simpson Way showing part of Hopkins development and proposed site entrance area

Figure 8: Views 9 and 10

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View 11: Looking north from the north side of the existing hedgerow which runs east/west across site showing site in the foreground with site boundary across arable field



View 12: Looking south from informal pedestrian access off Dale Tree Road with site boundary following line across field of new development (Hopkins)

Figure 9: Views 11 and 12			
Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
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Site behind intervening vegetation



View 13: Looking north along Barrow Hill with proposed site to the east beyond existing vegetation

Footpath and hedge across site

Short stretch of (N/S hedgerow)



Figure 14: View looking east with footpath and hedge across site and short section of north/south hedgerow/outgrown trees

Ditch (with hedge) across site



View 15: Showing existing wet ditch across site adjacent to hedgerow (context)

Approximate extent of site - partly beyond existing vegetation



View 16: Looking west along Footpath 12

Figure 10: Views 13, 14, 15 and 16

Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
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existing industrial units are visible to the south of the Site with the 'enclosed' Byway entrance running south of these. This entrance is very wet and muddy due to its limited width and enclosed nature. Roofs of housing along the Bury Road are just visible beyond the existing hedge line. The land falls away to the east towards Wilsummer Wood with properties becoming less visible due to the topography and tree cover. The sparsely developed area to the east of Barrow is evident here with fine undulating landscape features, including Wilsummer wood.

- 3.36** View 5 is at the entrance to the field having come through the covered byway route from Barrow Hill. This view is relatively unspoilt, but the new development is a detracting feature. Between this point and View 1, the settlement of Barrow becomes much more evident and only at this point is the view a more rural one.
- 3.37** Having walked around the Byway (22) and joined the footpath (12) headed west, the hedgerow opens up for a short section revealing the development along Barrow Hill and the Site again. View 6 is looking west towards Barrow Hill and shows the footpath route which joins the new development and the existing hedgerow and ditch which runs across the Site. This hedgerow forms a very important feature together with the ditch, creating a visual and landscape link to the woodland at Wilsummer Wood. The hedgerow is relatively dense in places with open stretches. The condition of the hedgerow is somewhat degraded with dead/dying trees and outgrown hedgerow planting. This feature should be retained where possible and significantly enhanced or replaced in places.
- 3.38** View 7 is located at the western end of Footpath 12 where it joins the new development under construction. This view is predominantly a very pleasant landscape scene with the new houses along Barrow Hill being set hard against the existing site boundary with little room for a soft landscape edge. The views are therefore rather jarring set against the wooded scene to the east.
- 3.39** View 8 is located in a gateway along Barrow Hill just before you enter the village. The view, looking north along the road towards Barrow shows development to the west of Barrow Hill. The existing industrial units are just visible beyond the intervening vegetation which forms the southern boundary of the Site. This hedgerow, a good quality and well-maintained native hedge provides good screening and it is unlikely that development will be visible at all during summer months.
- 3.40** View 9 is looking north along Barrow Hill at the existing (byway) entrance to the Site. The bungalow and existing industrial units are an important detracting feature at this point. The design process should ensure that any development of this corner provides for a 'beacon' building, a 'welcome to Barrow', whose scale and sensitive design is highly appropriate to this gateway to the village. Road frontage housing should also particularly reflect the character of the village.
- 3.41** View 10 is located looking east from Simpson Way, showing a (slightly curved close) view into the Site. New housing to the north shows the extent of existing development (Hopkins) with the temporary compound being utilised where future development is proposed. It is important here that the entrance to the Site is well considered, providing a cohesive street scene.

- 3.42** View **11** is located within the Site looking north of the existing hedgerow that crosses the site (east/west), showing the residential and commercial buildings along Bury Road and Dale Tree Road. The proposed northern boundary of the development sits to the foreground of this view with some 300m between this and the existing property boundaries. The boundary vegetation to these properties is relatively poor and varied. Detracting features are the commercial/industrial building which sits adjacent to the Weeping Willow PH and the lighting column.
- 3.43** View **12** shows the view from an informal access onto the field at the end of Dale Tree Road. This is a low-key public viewpoint with a glimpsed view through the intervening hedgerow for most users. Boundary treatments vary along this stretch of development, but this field is to the rear of most properties here, many of which are single storey. The scheme would however benefit from a good quality buffer to this boundary.
- 3.44** View **13** is located out of the village adjacent to Wolfe Hall. This view shows the varied topography of the area, the valley being very evident and obscuring much of the view when travelling into the village. This view shows the development to the west of Barrow Hill, the hard edge of which, again, is very visible. The proposed Site lies behind existing vegetation to the east of the road and will be predominantly screened from view.
- 3.45** View **14** is looking east from Footpath 12 showing the ivy clad short section of hedgerow that runs north/south within the site at a closer view. This hedgerow provides a valuable landscape feature and would benefit from enhancement.
- 3.46** View **15** shows the existing ditch adjacent to Footpath 12 which, at the time of survey, contained some level of water.
- 3.47** View **16** (single shot) is looking west along Footpath 12 looking towards the Site where the footpath enters. Development will be more evident to the northern side of this hedgerow initially.

BARROW GREEN

SECONDARY VIEWS



KEY

-  RESIDENTIAL AREAS
-  COMMERCIAL AREAS
-  PLOT FRONTAGES
-  STRATEGIC TREE PLANTING
-  EXISTING VEGETATION
-  PROPOSED WILDLIFE POND/ SUDS
-  PROPOSED WILD FLOWER GRASSLAND
-  PROPOSED NATIVE BUFFERS
-  PROPOSED AMENITY GRASSLAND
-  PROPOSED NATIVE SHRUB AND HERBACEOUS WETLAND PLANTS
-  COMMUNITY ALLOTMENT AREA
-  PRoW (BYWAY) THROUGH SITE
-  PRoW (FOOTPATH) THROUGH SITE

SES 20015-101 LANDSCAPE STRATEGY

Drawn by: LF	Date: DEC 2020	Scale: NTS @A3	Rev: .
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Site: Land east of Barrow Hill, Barrow		Tel: 01268 711021 team@ses-eco.co.uk	



4 Landscape Strategy

Site Identification

- 4.1 The Site has been identified as a potential housing site within the West Suffolk SHELAA.

Current Proposal

- 4.2 The current proposal is to secure an allocation in the emerging West Suffolk Local Plan for approximately 120 new dwellings, including a policy-compliant number of affordable dwellings, with associated infrastructure, parking, public open space and landscaping
- 4.3 In addition to this residential use, up to 1ha is allocated for commercial use to the south east of the site.
- 4.4 The remaining areas of land will be retained to provide significant landscape and biodiversity enhancements to integrate the development into its landscape context and provide a high level of amenity to the village.

Landscape Strategy

- 4.5 To ensure that the scheme remains sensitive to the character and appearance of the area the proposals have been informed by an analysis of the site and its context (see **Section 3.0** above). In accordance with national and district planning policy and landscape guidelines existing green infrastructure will be retained and enhanced to provide a strong landscape framework that delivers landscape and ecological benefits alongside the development of new homes.
- 4.6 The key principles of this approach include:
- The retention and enhancement of existing important landscape features and wildlife habitats including trees, ditches and hedgerows;
 - A carefully designed housing layout with a high-quality built form informed by the traditional architecture and palette of materials present in and around Barrow, with developable area focussed to the west of the Site;
 - Carefully considered commercial development to the south west of the site to replace the existing provision, taking into account important views from the south of the village;
 - A strong landscape buffer to the east of the site providing a soft edge to the development boundary, which is currently rather a jarring element of the landscape (previous recent development along Barrow Hill);
 - The provision of a SUDS basin to the east of the site integrating into the rural landscape beyond.
 - The establishment of substantial areas of green infrastructure (GI) to provide a strong framework of habitats including new planting. The GI will:

- retain and enhance existing public rights of way through the site, maintaining and improving access to the surrounding countryside.
- provide new areas of open space with amenity and recreational value.
- Restore areas of derelict land and enhance local landscape character.
- visually integrate the buildings into the landscape in views from adjoining roads and rights of way and the wider countryside (primarily to the south and east).
- mitigate the effect on protected species.
- ensure net biodiversity gain.
- The integration of selected views to surrounding landmarks / features.

4.7 The resulting landscape strategy is shown in drawing SES 20015-101 that accompanies this representation.

Landscape Strategy Plan

4.8 The main principles of the landscape strategy are summarised below.

Existing Trees

4.9 The majority of existing trees which are important features in the landscape are located beyond the developable area of the site. The limited number of trees to be removed will be replaced as part of the comprehensive landscape scheme, with tree works undertaken as required to ensure that the vegetation remains a sustainable feature in the long-term. A detailed arboricultural method statement will be prepared post planning outlining the measures required to ensure the protection of all retained trees for the duration of the demolition and construction phase.

4.10 The existing footpath that crosses the site (PRoW 12), sits adjacent to an established hedge and ditch. This important landscape feature would benefit from enhancement due to the species, quality and condition of the existing vegetation. Elm and ash within this hedgerow are unsustainable in the long term as the hedge exists, and some replacement planting may be required.

Frontage of Barrow Hill

4.11 The character and views of the site frontage along Barrow Hill will be predominantly maintained and enhanced. A more unified street scene will be provided with the proposed development. At the time of survey, the existing road frontage formed a site compound and works around the existing industrial buildings to the south west of the Site. A more appropriate road frontage at this sensitive gateway to the village will comprise a mix of development with high quality strategic planting.

4.12 Development to the south western part of the site will comprise commercial units. It is envisaged that the existing tall steel units will be replaced with more sensitive, barn style development which will tie in with the surrounding landscape character and local vernacular.

4.13 Access onto Barrow road will be provided between one area of commercial development and proposed dwellings. This frontage and viewpoint will form an important aspect of the

development and high-quality strategic planting both along the roadside and down the access route should be provided.

- 4.14** The remainder of the development will be laid out to the west of the site, adjacent to existing development. Some strategic tree planting will be provided between the existing and proposed development to soften the hard edge that currently exists as well as providing ecological value.
- 4.15** Strategic street tree planting around the residential units will provide amenity and ecological value and provide a 'cohesive sense of place' and high-quality environment for residents and visitors alike.
- 4.16** The development is effectively divided into two areas; mixed use to the south of the Site and a smaller area of residential development beyond the existing PRoW 12 and hedge which crosses the Site. This allows for good connections to be provided with ecological corridors connecting this green space to the landscape to the south and east. There will also be provision for some village allotments on the north of the Site.
- 4.17** The central green belt across the Site will be significantly enhanced to provide a distinct break between the two areas of development, creating a more rural feel to the development.
- 4.18** The eastern part of the Site (both north and south) will provide a high quality, extensive green buffer to the landscape beyond, enhancing the views from the west which are currently somewhat degraded by a very hard settlement edge. Large areas of open improved grassland, blocks of native shrub planting, hedges and high quality, long lived trees will create a strong ecological and visual buffer to the new settlement edge.
- 4.19** A new pond will provide sustainable drainage benefits whilst creating a species rich habitat and strong visual feature within the landscape. This pond will be planted with wetland species, including some trees and native shrub planting around the perimeter. Pond edge perennial planting will provide excellent habitat value whilst maintaining water quality.
- 4.20** A strong hedgerow buffer will be provided to the north of the Site where the development abuts existing agricultural land. Views from properties on Bury Road will be softened by this tree and hedgerow feature.
- 4.21** Within the areas of Public Open Space, a mix of wildflower meadows and mown grassland will provide high quality habitat and amenity value whilst significantly enhancing the biodiversity of the agricultural field.
- 4.22** Low key paving (hoggin or similar) paths and mown grass paths will pass around and through the Public Open Spaces, retaining the rural character of the Site and linking these areas as well as providing valuable links across the Site to the existing PRoW network for residents and visitors alike.

Site Wide Green Infrastructure

- 4.23** As outlined above the area surrounding the site will be enhanced establishing a significant green infrastructure resource. The primary aims of this GI will be to integrate the settlement

along Barrow Hill, including the application Site into the surrounding landscape, whilst enhancing landscape, biodiversity and visual amenity.

- 4.24** Selective planting of fruit trees will complement the habitats already present, providing a food source for badgers and birds. New native hedgerows and trees to the north and east will reinforce the pattern of existing field boundaries and link the native tree and shrub planting around the development edge with the mature hedgerows that exist and improving ecological connectivity across the site.

Strategic Planting

- 4.25** All strategic vegetation will incorporate a mix of native species which are characteristic of the local area including oak, beech and field maple. Hedgerows and native planting will comprise a mix of species including hawthorn, blackthorn, field maple, hazel, holly, birch, elder and dog rose. The inclusion of holly will provide a proportion of evergreen vegetation ensuring structure and screening throughout the year.
- 4.26** Trees will be planted in a range of stock sizes to provide immediate impact in key areas of the site (such as at the site entrance), whilst predominantly using stock of more modest size to naturally succeed larger stock and deliver a sustainable green framework in the medium-to long-term. Where possible plants and seed mixes should be supplied from a source with a known local provenance.
- 4.27** Within the residential areas a mix of both ornamental and native species is appropriate, with trees, hedges, and planting important to provide visual and seasonal interest, enhance biodiversity and soften the built form. Planting should incorporate a range of species of known value for wildlife.
- 4.28** Full details of proposed landscape and ecological works will be agreed by condition. This will incorporate detailed landscape drawings; an Ecological Mitigation and Management Plan; and a specification setting out the methods, standards and timeframes for the protection of existing habitats / species, the implementation of habitat management works, new planting and seeding, along with the initial maintenance required to ensure the successful establishment of the landscape scheme.

Lighting

- 4.29** Due to the absence of surrounding lighting to the east of the Site, it is recommended that external lighting is kept to a minimum. Careful consideration should be given to the location of the lighting, the light source and the type of luminaires to ensure that the effects of light pollution and sky glow are kept to a minimum.

Long-term Management

- 4.30** Once established all areas of green infrastructure and open space will be managed in the long-term for their landscape, amenity and biodiversity value. The full details including responsibilities, management aims and objectives, and maintenance operations will be secured through the preparation of a Landscape and Ecological Management Plan (LEMP).

Landscape and Visual Effects

- 4.31** The Site lies to the east of the existing settlement and is part of an important gateway into the settlement from the south. The existing built features at this point provide little benefit to the surrounding landscape and character of the area.
- 4.32** The proposed development is on land which is currently in agricultural use (Grade 2). There are some good quality elements within the proposed development area including the existing hedges and the PRoW network, of which the Site forms an important part. All good quality vegetation will be retained, whilst the lower quality hedgerow across the Site will be significantly enhanced.
- 4.33** The PRoWs are currently of high amenity value, being, in the main well maintained and well used. A small area to the south west of the Site (PRoW 22 – Byway) is currently rather degraded due to the enclosed nature and narrow route that exists, resulting in a very narrow muddy track which requires improvement.
- 4.34** The PRoW (12) will be retained and will be incorporated into the high-quality Open Space that will cross the Site. Additional tree planting, together with the improved grassland will provide very high-quality amenity, whilst retaining the overall character of this route and maintaining and enhancing access to the wider PRoW network to the east and south.
- 4.35** Views from the east of the Site currently contain a very hard edge to the existing settlement boundary, with new development sited very close to its boundary. The proposed development will provide a very strong landscape buffer to the new eastern boundary, integrating this part of the settlement into the wider landscape and improving views from the east.
- 4.36** Views from the north, although the development will be seen closer to the existing dwellings on Bury Road these will be softened by the proposed strong landscape buffer to the north of the Site. The dwellings will also be seen within the existing context of built development to the west of the Site.
- 4.37** From the west, views into the Site from Barrow Hill will be improved with the loss of the large-scale industrial units which will be replaced by more appropriate, barn style commercial development. These buildings will form an important feature to the southern gateway to the village and the design and associated strategic planting will need to be carefully considered.
- 4.38** The road frontage to Barrow Hill will be enhanced, providing a cohesive street scene; a considerable enhancement of the existing landscape.
- 4.36** The nature and scale of landscape and visual effects arising from the proposed development therefore will be substantially beneficial, with the comprehensive and improved green infrastructure delivering additional landscape and ecological enhancements.

5.0 Conclusion

- 5.1 This Landscape Statement has been prepared by SES to accompany a representation for the allocation of land to the east of Barrow Hill, Barrow in the new West Suffolk Local Plan. The proposal involves the construction of approximately 120 new dwellings, including policy compliant affordable dwellings, with associated infrastructure, parking, public open space, SUDS and landscaping.
- 5.2 The site identified as WS010 within West Suffolk Council SHELAA and includes part of WS014 (part of which is currently under construction) to the south west.
- 5.3 The site lies within the countryside of the Plateau Estate Farmlands. Within the Suffolk LCA, the area around Barrow is particularly noted for its extensive woodland cover (including ancient woodland) and the strong estate character and influence of Ickworth Park.
- 5.4 The surrounding undulating valley topography and vegetation allows both enclosed and open views.
- 5.5 The Site as it stands is representative of the regional and local character areas, being open farmland with established field boundaries and both open and enclosed views locally. The site is however presently somewhat degraded by the existing hard edge to the settlement boundary provided by new development along Barrow Hill. Existing large scale industrial units provide additional detracting features both within the Site and from views from Barrow Hill and beyond.
- 5.6 The principle of potential development of the site is considered in its identification within the SHELAA. This further study assesses the potential effects of the proposal on the landscape character and visual amenity to support the representation in the new Local Plan.
- 5.7 The Proposed location is well thought out and provides a very strong vegetative buffer to the east of the Site, a good mix of residential and commercial units and provides a high level of Public Open Space, incorporating and enhancing the existing PRow features.
- 5.8 The proposed design and layout and location of the Site therefore responds appropriately and sensitively to its context. Provided that the detailed design and careful use of materials provides visual variation in the built form and roofscape, when viewed from the surrounding area, the development would maintain and enhance the local character of the area.
- 5.9 The high level of Public Open Space and the incorporation of the existing PRow network provides significant landscape, amenity and biodiversity enhancements to integrate the development into its landscape context. In accordance with national and district planning policy and landscape guidelines existing green infrastructure will be retained and enhanced to provide a strong landscape framework that delivers landscape and ecological benefits alongside the development of new homes. The key principles of this approach form an integral part of the Landscape Strategy. Full details of soft landscape, including strategic planting will be agreed by conditions of any planning consent with a Landscape and Ecological Management Plan to secure the management of the area in perpetuity.

- 5.10** The location of the site sits well within the existing context of the village settlement. In comparison to other locally identified potential sites, the proposal site would not encourage coalescence of settlements, would provide an appropriate soft settlement edge (not currently existing) to the important views from the east and would allow sufficient space to provide a very high level of amenity and ecological enhancement. The site is well related to the PRoW network and encourages sustainable living.
- 5.11** In conclusion, the proposed development sits very well within the landscape context and provides a high level of benefit to the village of Barrow, both visual and landscape effects being beneficial in nature.

Landscape Statement - Land east of Barrow Hill, Barrow, Suffolk

Figures & Drawings

Figure 1:	Site Location and Study Area
Figure 2:	Site Analysis
Figure 3:	Location of Representative Views
Figures 4-10:	Representative Views
Drawing 20015-101:	Landscape Strategy Plan

Appendix 1: Sources of Information

Mapping and Other Data

- Ordnance Survey maps (1:25 000 Explorer Series)
- Historic Ordnance Survey Maps
- Aerial Images
- Multi-Agency Geographic Information for the Countryside (MAGIC)
<http://magic.defra.gov.uk>
- Historic England Listed Building Map <https://historicengland.org.uk/listing/the-list/map-search>
- Suffolk County Council Definitive Maps <http://www.suffolkpublicrightsofway.org.uk>

Adopted Planning Policy and Supporting Documents

- National Planning Policy Framework (NPPF) and associated Planning Practice Guidance, Department for Communities and Local Government, February 2019
- West Suffolk Local Plan – Core Strategy 2010

Other Published Documents / Supporting Information

- National Character Area Profiles:
- NCA Profile 86: South Suffolk and North Essex Clayland (NE515), Natural England, July 2013
<http://publications.naturalengland.org.uk/>
- East of England Landscape Framework, Landscape East <http://landscape-east.org.uk/>
- Green Infrastructure Guidance, Natural England 2009
- Guidelines for Landscape and Visual Impact Assessment, Landscape Institute and Institute of Environmental Management and Assessment, 3rd Edition, 2013
- An Approach to Landscape Character Assessment, Natural England, October 2014
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691184/landscape-character-assessment.pdf
- Landscape Character Assessment: Guidance for England and Scotland, The Countryside Agency and Scottish Natural Heritage, 2002
- Advice Note 01/11: Photography and Photomontage in Landscape and Visual Impact Assessment, Landscape Institute, 2011
- BS5837:2012: Trees in Relation to Design, Demolition and Construction – Recommendation, BSi, April 2012

TECHNICAL NOTE

Job Name: Land east of Barrow Hill, Barrow

Job No: 50471

Date: 4th December 2020

Prepared By: [REDACTED]

Subject: Transport and Access Review

1. Introduction

- 1.1. Stantec UK Ltd has been appointed by [REDACTED] to prepare this Transport and Access Review to assist the promotion of residential development on Land east of Barrow Hill, Barrow ("the Site").
- 1.2. This technical note describes the transport policy context against which development proposals for the Site will be assessed, the main objective of which is to promote sustainable travel choices and reduce the need to travel as a single occupant car driver. The existing transport context of the Site is then described, to understand how the surrounding existing and committed transport networks will assist with the achievement of this planning policy objective. The technical note then presents a high-level transport strategy for the development, which seeks to guide the delivery of a sustainable development for which efficient, attractive and reliable means of non-car travel are available and preferred over the use of the private car. This will minimise the development's transport impacts on the wider highway network.

2. Site Location

- 2.1. The site is located on the southern edge of Barrow, immediately east of Barrow Hill, and is bound by agricultural land to the north, east and south, Barrow Hill and existing residential units to the west. The site currently consists of agricultural land. Figure 1 below illustrates the site location.

Figure 1 - Site Location



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- 2.2. The Site is located approximately 600m south of the centre of Barrow and 8.75km west of Bury St Edmunds town centre. Barrow is identified as a Key Service Centre and has several local facilities including a primary school, a pharmacy, a convenience store, a village hall, two public houses and a GP Surgery. These meet many of the day-to-day needs of existing residents in Barrow, reducing the need to travel further.

3. Policy and Guidance Context

- 3.1. National and local transport policies and guidance form an important basis for the transport strategy for the Site. They are summarised below, the overall theme being to reduce the need to travel, particularly by private car.

National Planning Policy Framework (2019)

- 3.2. The key aim of the National Planning Policy Framework (NPPF) is to promote and achieve sustainable development. This aim is highlighted in Paragraph 10 which states that 'at the heart of the Framework is a presumption in favour of sustainable development'. Chapter 9 of the NPPF covers the promotion of sustainable transport, noting that:

Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health (paragraph 103).

- 3.3. It advises that, when assessing sites that may be allocated, or specific applications for development:

(a) Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

(b) Safe and suitable access to the site can be achieved for all users; and

(c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree (paragraph 108).

- 3.4. NPPF further advises (at paragraph 110) that, for development proposals, priority should be given first to pedestrian and cycle movements, and second – so far as possible – to facilitating access to high-quality public transport. These NPPF's transport policies seek to address impacts related to growth in vehicular traffic, such as worsening traffic congestion (with consequent delays affecting the economy), road safety concerns and climate change. Importantly, they also seek to improve people's health and well-being, by:

- Promoting new developments that deliver healthy lifestyles through the uptake of active travel modes (i.e. walking and cycling);

- Reducing vehicular emissions to improve air quality; and

- Increasing the opportunities for social interaction by creating well-designed streets and neighbourhoods.

- 3.5. These national policy aims are reflected in local policies and guidance, which are described below.

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Suffolk Local Transport Plan 2011-2031

- 3.6. The Third Local Transport Plan describes Suffolk County Council's transport strategy for the period 2011 to 2031. The Suffolk LTP overall vision is:

"The key focus of the plan is to support Suffolk's economy as it recovers from the recession and to support future sustainable economic growth."

- 3.7. The approach within the LTP is to show how transport will play its part in supporting and facilitating future sustainable economic growth by:

- maintaining (and in the future improving) our transport networks;
- tackling congestion;
- improving access to jobs and markets;
- encouraging a shift to more sustainable travel patterns.

St Edmundsbury Borough Council Local Plan

- 3.8. The St Edmundsbury Local Plan sets the long-term planning and land use policies within the Borough. The Local Plan includes documents previously referred to as the Local Development Framework (LDF). The Local Plan is made up of the of the following:

- Core Strategy: this was adopted on 14 December 2010, it sets out the vision, objectives, spatial strategy and overarching policies for the provision of new development in the Borough up to 2031
- Vision 2031: consists of three Local Plans, Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031, these were adopted on 23 September 2014 and identify where growth will be allowed and what local everyday services people will need to enjoy a good quality of life.
- Joint Development Management Policies Document: this was adopted on 27 February 2015 by Forest Heath District Council and on 24 February 2015 by St Edmundsbury Borough Council. It contains policies that form an important tool for the day to day determination of planning application in both St Edmundsbury Borough and Forest Heath District.
- St Edmundsbury Policies map: this shows the areas where the policies of the adopted Core Strategy, Vision 2031 and joint development management policies local plan documents will apply.

New West Suffolk Local Plan – Issues and Options (Regulation 18) December 2020

- 3.9. West Suffolk have commenced a review of the local plan. Once adopted, the new Local Plan will replace the existing local planning policies. The new Local Plan will set out a vision for the area, establishing the long term aims and aspirations for the district going forward. The Plan will include policies and allocations that help to deliver these aims and aspirations. The vision set out by West Suffolk Local Plan (Regulation 18) is as follows:

"Being ambitious is supporting and investing in our West Suffolk communities, businesses and the environment, to encourage and manage growth in prosperity and quality of life for all."

- 3.10. The New Local Plan sets 19 strategic objectives. Objectives 18 and 19 directly relate to transport planning of developments and are as follows:

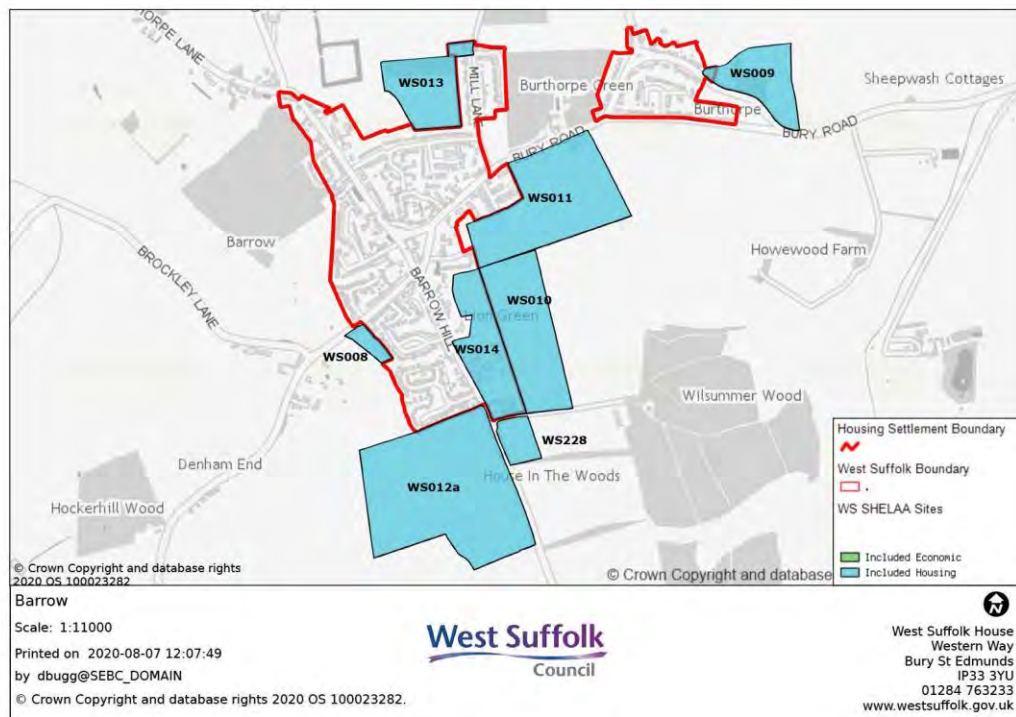
TECHNICAL NOTE

SO18. Reduce the need for travel and make access to jobs, facilities and green space by public transport, walking and cycling safer and easier.

SO19. Recognising the differences between urban and rural areas, foster and promote an integrated sustainable transport network across the district that promotes a modal shift in travel.

- 3.11. Land east of Barrow Hill is included within the Strategic Housing and Economic Land Availability Assessment for Issues and Options (Regulation 18) stage and has passed the initial tests of being suitable, available and achievable. See figure 2 below.

Figure 2 - Barrow SHELAA Sites



- 3.12. The focus of transport policy guidance for new developments from the NPPF and the emerging Local Plan is to reduce the need to travel before then prioritising non-car modes of travel, focussing on accessibility by walking, cycling and public transport. Travel by the private car is at the bottom of the transport-user hierarchy. Policies and guidance also recognise that new residential allocations can help achieve housing needs in a sustainable manner, assuming they provide sufficient access to services and employment opportunities with the surrounding area. Meeting these transport policy objectives will help address concerns related to increasing traffic congestion, climate change and people's health and well-being.

4. Existing Transport Conditions

Existing Travel Patterns of Residents near the Site

- 4.1. The 2011 Census journey to work data on existing residents near the Site indicates that about 77% travel to work by private car. 1% travel by train, 7% walk, 2% travel by bus and 2% by cycle. The main employment destination is St Edmundsbury, with about 62% of residents working in the area. Forest Heath is the other main employment destination with 10% of residents working in the district. About 1% work in London. The remainder are spread primarily across Suffolk and Cambridgeshire.

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- 4.2. The main employment areas accessible to Barrow are Saxham Business Park (7km) and employment opportunities within Bury St Edmunds (10km) and Newmarket (15km).

Walking and Cycling

- 4.3. There is a new shared cycle / footway along eastern side of Barrow Hill that has been provided by the adjacent Hopkins Homes development. This provides a connection to the existing footway network in Barrow to the north. Barrow Hill forms part of the National Cycle Route 51 which begins in Oxford and passes Milton Keynes, Bury St Edmunds and Ipswich before reaching the coast at Felixstowe
- 4.4. Despite the existing limited cycle infrastructure, the site is within walking distance of the local amenities within Barrow (15 minutes' walk) and within cycling distance of key employment destinations such as Saxham Business Park and Bury St Edmunds (3 minutes cycle). The Department for Transport's Local Transport Note 2/08 'Cycle Infrastructure Design' advises that, for commuter journeys, cycling distances up to 10km are not uncommon. There is therefore potential for the cycling mode share for residents of the development to be appreciably higher than that recorded in the 2011 Census. This would be assisted by the site supporting the implementation and development the Suffolk Cycling Strategy and its Delivery Plan once this is published.

Public Transport – Buses

- 4.5. The nearest bus stops to the site are on Barrow Hill North of the site, adjacent to Brittons Road. The Bus Stop is approximately within a 7-minute walk (500m) of the site. All bus stops within Barrow are served by Mulleys Motorways No 312. The No 312 service connects the site with Newmarket and Bury St Edmunds, with a weekday frequency of 5 buses per day in each direction. This route provides a service to key destinations, with typical journey times to Bury St Edmunds of 20 minutes and to Newmarket 30 minutes.
- 4.6. The site has good accessibility to bus services that connect with key employment destinations, indicating there is potential to increase the bus mode share for the development's residents from the relatively low level recorded at the 2011 Census.

Public Transport – Rail

- 4.7. The nearest railway station is Kennett, approximately 9.5km to the west of the site. Kennett station is served by Greater Anglia trains on the Cambridge to Ipswich Line. Weekday frequencies are hourly in either direction, with journey times to Cambridge of 34 minutes and to Ipswich of 49 minutes.

Local Highway Network

- 4.8. The site has frontage with Barrow Hill, although has no existing access. With the introduction of new site access, the site will be able to be accessed from the existing highway network which includes junction 40 of the A14, 4km to the north of the site.

5. Access and Movement Strategy

- 5.1. The approach to be adopted in developing an effective access and movement strategy for the site will be founded on national and local transport policy and in recognition of the local transport context for the Site. Accordingly, the access and movement strategy for the Site will seek to achieve the following objectives:
- Reduce the need to travel alone as a private car driver;
 - Maximise walking and cycling for local trips with surrounding areas over use of the private car; and

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- Encourage public transport use through existing services which link with surrounding areas.

Reducing the Need to Travel

- 5.2. An important element of the design of the development will be to enable easy permeability and connectivity by walking and cycling with the surrounding area, so that the site becomes integrated with Barrow. This will deliver excellent opportunities for residents of the development to be able to access key local employment areas on foot or cycle, and therefore limit the number of car trips generated by the development that would otherwise travel further afield, and therefore reduce the impact on existing highway infrastructure. Greenways through the site will be an important element of this permeability and connectivity.

Prioritising Walking and Cycling for Local Trips Over Use of Private Car

- 5.3. The development can explore assisting with the delivery of the West Suffolk Cycling Strategy. Other infrastructure measures to be considered on and off-site to encourage walking and cycling could include provision of direct and linear footways/cycleway connecting to key local amenities, bus stops and local centre. The internal design of the site, including the greenways through the site, would be such that priority is given to pedestrians and cyclists over the private car.
- 5.4. Walking and cycling will also be encouraged as part of a Travel Plan that will be prepared for the development. A Travel Plan Co-ordinator will promote the Travel Plan and provide a Personalised Travel Planning (PTP) offer to residents to identify how walking and cycling can easily meet their travel needs whilst also assisting with healthy and active lifestyles.
- 5.5. Walking and cycling are not just about achieving sustainable travel from A to B. They are important recreational activities in themselves, providing valuable opportunities for healthy and active lifestyles and improving well-being. The development's greenways will therefore enable residents to access and enjoy the existing network of green infrastructure.
- 5.6. Through the promotion of walking and cycling, and the accessibility of the high-quality walking and cycling infrastructure linking the site with the surrounding area, the development will achieve the important objective of prioritising walking and cycling for local trips over use of the private car.

Maximising the Use of Public Transport

- 5.7. The strategy for the development will include proactive and sustained encouragement to residents to use this bus and rail network, and this would be part of the Travel Plan for the development, including a Travel Plan Co-ordinator on-site to assist with residents' travel needs. This would be part of the PTP service that would be available to residents.
- 5.8. The development will explore improvements to public transport bus provision, namely improved bus waiting facilities and services. Access to Kennett and Bury St Edmunds railway stations will be an important part of any public transport strategy for the site, as they provide fast and frequent connection between the site and key employment locations such as Cambridge and Ipswich. The development will explore the potential for improved cycle access to these stations as part of the Suffolk Cycling Strategy, along with the potential for improved cycle facilities at the stations, for example cycle parking.
- 5.9. These improvements will assist with the development encouraging the use of public transport by residents, which will further contribute towards the objective of reducing the need to travel by private car.

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Vehicular Access Strategy

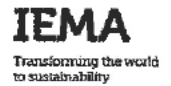
- 5.10. The access for the site will be taken from a new junction on Barrow Hill. Highway design standards states that a simple priority T-junction would be sufficient for the access. The site access, including the required visibility splays, would be deliverable on land within the site and / or the public highway. It is likely that Suffolk County Council Highways will require visibility splays of 90m to the north and 120m to the south from the proposed access, in accordance with DC/16/0300/OUT. Speed surveys will also be undertaken to confirm design speeds. The minimum stagger distance between the proposed access and Simpson Way will be now less than 25m.
- 5.11. Within the site, streets will be designed in accordance with the principles of Manual for Streets, meaning the needs of pedestrians and cyclists will be considered from an early stage in the design of the masterplan.
- 5.12. A key part of the site's transport strategy is to address the habitual use of the private car. This will mean devising a strategy where many people in the future would prefer not to travel by the private car. It also recognises the serious health and environmental concerns that continued car use will bring, along with the associated levels of traffic congestion. The focus for the site's transport strategy has therefore been on non-car modes of travel and looking to the future, rather than perpetuating car use by planning the strategy on the basis of past travel patterns where car travel has dominated.
- 5.13. Therefore, the development does not propose any significant highway capacity improvements on the local highway network. These would only make it easier to travel by car, and a key national and local transport policy objective is to reduce travel by private car. However, the development would assist with the delivery of highway infrastructure improvements where these would address road safety concerns, or improve access for walking, cycling and public transport.

Travel Plan

- 5.14. The preparation of a site wide Travel Plan (TP) aimed at maximising opportunities for the new residents of the site to reduce the need for vehicular travel, especially by single occupancy cars. The TP will set out the guiding principles, outcomes, targets and measures to be implemented to facilitate and deliver opportunities to travel by sustainable modes. The TP provides a mechanism for the delivery of measures aimed at reducing the dependency on the private car. The TP will contain targets, measures and indicators to limit the impact of development related trips on to the highway network, but also to maintain sustainable travel patterns.

6. Summary

- 6.1. This Transport and Access Review for Land east of Barrow Hill, Barrow sets out principles to deliver a development in which residents have good access by walking, cycling and public transport with main destinations and the surrounding area. It seeks the delivery of a sustainable development that is integrated with existing walking, cycling and public transport networks, so that the development has connectivity with surrounding areas by these modes, as well as permeability through the site.
- 6.2. The proposed strategy therefore aims to deliver a vibrant and healthy community with a choice of travel modes, and where non-car means of travel are preferred over the use of the private car. With the implementation of the strategy, it is considered that the site is deliverable, accords with national and local transport policy guidance, and that therefore there are no transport nor highways reasons why land east of Barrow Hill should not be allocated for residential development in the West Suffolk Local Plan.



Barrow cum Denham

Neighbourhood Plan

Representations

DRAFT



Please see below representations to each policy in the Draft Neighbourhood Plan.

POLICY BCD1 – The Spatial Planning Strategy

In the period 2019 to 2041 the Neighbourhood Plan area will accommodate new strategic development in accordance with the designation of Barrow as a Key Service Centre in the Local Plan settlement hierarchy. With the exception of the strategic, mixed-use, site allocation at Barrow Hill, set out under Policy BCD2, or proposals for new sport and recreational infrastructure, set out under Policy BCD9, all additional new windfall development will be primarily focused within the defined Village Settlement Boundary of Barrow.

Outside of the Settlement Boundaries, priority will be given to protecting and enhancing the surrounding countryside from inappropriate forms of development. New development proposals will only be supported where:

- i. **It is essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other exceptional uses for which it can satisfactorily be demonstrated that it needs to be located in the countryside;**
Support.
- ii. **It would not have significant adverse impact on the landscape setting of either Barrow, Denham or Burthorpe.**
Support.
- iii. **It would not result in the coalescence, loss, or erosion of existing settlement gaps between Barrow, Burthorpe and Denham.**
Particularly support.
- iv. **It would maintain the distinctive views of the surrounding countryside from public vantage points within, and adjacent to, the built-up area of Barrow, Burthorpe and Denham.**
Support.

- v. **Proposals for the conversion of redundant or disused rural buildings, meet the criteria set out in Policy BCD3 of this Plan.**

Support (subject to comments regarding Policy BCD3).

- vi. **Development would meet the limited rural exceptions criteria, for special needs or local affordable housing, set out in Policy BCD4 of this Plan.**

Particularly support (subject to comments regarding policy BCD4).

POLICY BCD3 -- Non Strategic Housing Delivery

In the period 2019 to 2041 the Neighbourhood Plan area will primarily accommodate new housing delivery at Barrow Hill, as identified under Policy BCD2 of this Plan.

In addition to the strategic site allocation, this Plan provides for small infill, or other brownfield redevelopments, to come forward for new homes, on suitable sites, within the defined village Settlement Boundaries of Barrow and Burthorpe. Such developments will be judged on their merits and will be expected to meet all of the following relevant development criteria:

- i. **New infill development will not normally be expected to exceed 5 additional new homes. However higher infill numbers may be appropriate in some locations, where justified by the available capacity of the site and the resultant contribution of the proposed development to the character of the area.**

Support – although it would be helpful within the policy to add that the new infill development should also, where applicable, respect the density of the surrounding housing.

- ii. **New development proposals should be of a suitable scale and high quality design, appropriate to their particular location and/or street scene and should maintain or enhance local village character.**

Support.

- iii. **New development should not have any significant adverse impacts upon the existing amenities of neighbouring residents, by reason of scale, design or building proximity.**

Support.

- iv. **Where existing, buildings are proposed to be converted or demolished, which currently, or have previously accommodated local business or community uses, proposals must also satisfy the relevant requirements of Policies BCD7 and BCD8 of this Plan.**

Support (subject to comments regarding policies BCD7 and BCD8).