

Barrow cum Denham Neighbourhood Development Plan 2019-2041

**A report to West Suffolk Council on the Barrow cum
Denham Neighbourhood Development Plan**

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Executive Summary

- 1 I was appointed by West Suffolk Council in November 2024 to carry out the independent examination of the Barrow cum Denham Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 27 January 2025.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It proposes a site for mixed-use development, and includes policies on design and the natural environment.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
22 September 2025

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Barrow cum Denham Neighbourhood Development Plan 2019-2041 ('the Plan').
- 1.2 The Plan was submitted to West Suffolk Council (WSC) by Barrow cum Denham Parish Council (BcDPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises indirectly from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the development plan. It provides a context in which the neighbourhood area can maintain its character and appearance whilst delivering the strategic growth for Barrow as identified in the recently-adopted Local Plan.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Plan would then be used to determine planning applications within the neighbourhood area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by WSC, with the consent of BcDPC, to conduct the examination of the Plan and to prepare this report. I am independent of both WSC and BcDPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 42 years' experience either in various local authorities at either Head of Planning or Service Director level or since 2016 as an independent examiner. I have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met subject to the modifications in this report.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Report on the pre-submission Plan.
- the Habitats Regulations Assessment
- the Environmental Report
- the Design Guidance and Codes (December 2020)
- the Site Options and Assessment Report (2021)
- the representations made to the Plan.
- BcDPC's responses to the clarification note.
- the Inspectors' report on the West Suffolk Local Plan.
- the adopted West Suffolk Local Plan.
- the National Planning Policy Framework (December 2023 and December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 27 January 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the details contained within the overall package of submission documents.

3.4 The examination of the Plan has overlapped with the stages leading up to the recent adoption of the West Suffolk Local Plan. During the examination WSC advised that it had sent a document to the planning inspectors outlining the key main issues raised during the proposed main modifications consultation, and the Council's responses. WSC also advised that the planning inspectors would consider all the representations received and decide on next steps, and if any issues need revisiting, before issuing their final report. In these circumstances, I suspended the examination of the neighbourhood plan whilst the planning inspectors, and then WSC, determined how the Local Plan should proceed. These issues were addressed in two examiner notes (7 April and 2 May 2025).

The update of the NPPF

3.5 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning

authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

- 3.6 The Plan was submitted on 9 October 2024. On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.
- 3.7 Paragraph 6.2 of this report sets out full extent of the basic conditions against which a neighbourhood plan is examined.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), BcDPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and the policies in the Plan. It is presented in a concise fashion and is supported by nine detailed appendices. The Statement summarises the approach which took place on the pre-submission Plan. The consultation and engagement that was undertaken as the Plan was being prepared is addressed as a separate section within the submitted Plan.
- 4.3 The Introduction to the Plan advises that in 2020, BcDPC undertook a local consultation by way of a survey questionnaire which sought responses to over 50 questions covering demographics, amenities, infrastructure, future development, and the natural environment. The consultation opened ran from June to August 2020 and 375 responses were received.
- 4.4 The Consultation Statement summarises the engagement processes used for the pre-submission version of the Plan (September to October 2023), the comments received and the way in which the document was refined because of this process. The information in Section 3 of the Statement is supported by the details in Appendices 3-5. This information helps to describe the way in which the Plan evolved.

Consultation Responses

- 4.5 Consultation on the submitted Plan was undertaken by WSC. It ended on 11 December 2024. This exercise generated representations from the following organisations:
- Bloor Homes
 - Phizacklea, Stanton and Steer/Ceres Property
 - Fleur Homes
 - Suffolk Wildlife
 - Dedham Vale National Landscape
 - Historic England
 - Forestry Commission
 - National Highways
 - Natural England
 - Suffolk County Council
 - Sport England
 - West Suffolk Council
 - Swift
 - Anglian Water

- 4.6 Representations were also received from 51 parishioners. In several cases they objected to the development of the proposed allocation at Barrow Hill (Policy BCD2).
- 4.7 In some cases, the representations commented about the way in which the Plan was prepared and the limitations of the community engagement process. Section 4.3 of this report has highlighted that between the designation of the neighbourhood area in 2019 and the publication of the pre-submission Plan (in 2023) the community engagement process consisted of a survey questionnaire which generated 375 responses. Other neighbourhood plans are frequently supported by more extensive engagement processes. Nevertheless, on balance, and given the broader range of engagement within the pre-submission plan consultation exercises, I am satisfied that the process used meets the requirements of the Regulations.
- 4.9 I also note that concern has been expressed at BCDPC's choice of consultants. Plainly this is a matter of local judgement for BcDPC. Nevertheless, I am satisfied that the chosen consultants have produced technical reports to the standard which might reasonably be expected to support an emerging Neighbourhood Plan. I make specific observations on the findings of some of the technical report in the part of Section 7 of this report which addresses Policy BCD2 of the Plan.
- 4.10 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Barrow cum Denham. Barrow is a large village and had a population of 1,756 in 2021. It lies approximately 10 kilometres from Bury St Edmunds. It was designated as a neighbourhood area on 26 June 2019.
- 5.2 Barrow is designated as a key service centre in recognition of the important role it plays in serving the residents of the village and those who live in the surrounding rural area. The village provides several key services and facilities including convenience shops, a school and early years provision, post office, public houses, and a GP surgery.
- 5.3 The remainder of parish consists of attractive countryside. The small settlements of Burthorpe and Denham are located respectively to the north east and south west of Barrow.

Development Plan Context

- 5.4 The West Suffolk Local Plan was adopted on 15 July 2025. The submitted neighbourhood plan was developed as the Local Plan was being prepared.
- 5.5 Policy SP13 of the Local Plan identifies a Settlement Hierarchy. Barrow is one of seven Key Service Centres. The Plan comments that these settlements have the basic services needed to support the day-to-day needs of residents including a primary school, early years provision, convenience food shop, a pub, town or village hall, a recreation area and healthcare provision. Most key service centres have good access to the larger towns by public transport. These are the largest settlements, in terms of population, outside of the towns and provide several key services and facilities that meet the settlements' own needs, and the needs of other nearby smaller settlements. Each key service centre's capacity to support planned and additional growth has been carefully assessed according to its individual opportunities and constraints, resulting in a different apportionment of the overall district's future growth needs.
- 5.6 The Local Plan allocates two sites for residential development as follows:
- AP24 Land off Bury Road, Barrow - for around 150 homes; and
 - AP25 Land off Denham Lane, Barrow - for around 15 homes.

The Plan also reserves land to the north of the existing school playing fields for the expansion of Barrow Primary School (Policy AP26).

- 5.7 The following other strategic policies in the Local Plan are relevant to the submitted Plan:
- Policy SP1 The climate and environment emergency and sustainable development
 - Policy SP2 Flood risk and sustainable drainage
 - Policy SP4 Design
 - Policy SP14 Housing needs

- Policy SP16 Affordable Housing
- Policy SP17 Housing type and tenure
- Policy SP23 General employment and rural employment areas
- Policy SP24 Economic development and essential utilities in the countryside

5.8 The Plan has been prepared within this wider context and seeks to give a local dimension to the relevant policies in the Local Plan.

Visit to the neighbourhood area

5.9 I visited the neighbourhood area on 27 January 2025. I approached it from the A14 to the north. This helped me to understand its position in the wider landscape and to the strategic highway network.

5.10 I looked initially at Barrow village centre. The importance of the commercial and community facilities was self-evident. I noted that the various green areas gave an attractive openness to this part of the village.

5.11 I then looked at the proposed mixed-use allocation off Barrow Hill. I noted the layout and design of the existing modern housing in this part of the village and the way in which they connected into the surrounding countryside

5.12 I then looked at Burthorpe. I noted that its centre had an equally open aspect. I took the opportunity to look at the housing allocation off Bury Road in what was then the emerging Local Plan.

5.13 I then drove to Denham. I saw that it had a very different and rural character to that of Barrow.

5.14 I left the neighbourhood area and drove to Bury St Edmunds to the east. As with the initial part of the visit, this helped me to understand its position in the wider landscape and its accessibility to the strategic road network

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan in the area;
 - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

- 6.3 For the purposes of this examination, the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Barrow cum Denham Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the West Suffolk Local Plan;
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy, including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It includes a series of policies on development and environmental matters and allocates a site for mixed-use development.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. The Guidance also advises that policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted, the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan will achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies to establish a spatial strategy for the parish (Policy BCD1), for a housing/mixed use allocation (Policy BCD2), and for employment development (Policy). In the social dimension, it includes policies on housing types (Policy BCD4), community facilities (Policy BCD8), and sports and recreational facilities (Policy BCD9). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design (Policy BCD5), on sustainable construction (Policy BCD6), and on local heritage assets (Policy BCD11). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in West Suffolk in Section 5 of this report.

- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context. Section 7 of this report provides detailed commentary on the proposed allocation in the Plan (Policy BCD2). Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, BcDPC commissioned the preparation of an Environmental Report for the Plan. The report (February 2025) is thorough and well-constructed. It concludes that:

‘the Plan is likely to have long-term positive effects in relation to the ‘Population and Community’ and ‘Health and Wellbeing’ SEA themes. This primarily links to the Neighbourhood Plan’s support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), safeguard and improve the availability of services, facilities and amenities, and support opportunities for local employment. These policy provisions will support social inclusion, and community and economic vitality. The Neighbourhood Plan is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthy outdoor recreation and relaxation. These policy provisions will support the quality of life of residents.

The Neighbourhood Plan will also deliver long-term positive effects in relation to the ‘Landscape’ and ‘Historic Environment’ SEA themes. These benefits largely relate to the Neighbourhood Plan’s emphasis on protecting and enhancing the relationship between natural and built environment, protecting important landscape and heritage features, and facilitating improvements to the quality of the public realm. While the proposed site allocation is sensitive from a landscape and heritage perspective, it is considered that the neighbourhood plan policies provide a detailed overview of the proposed mitigation and enhancement measures which positively address the sensitivities. Nevertheless, the SEA recommends that new development proposals within the neighbourhood area should ensure that any archaeological finds (including details of their significance) are appropriately recorded in line with best practice guidance.

Additionally, the Neighbourhood Plan will bring minor long-term positive effects in relation to the ‘Biodiversity and Geodiversity’ SEA theme by encouraging proposals to protect existing and establish new habitats, enhance ecological networks (including through green infrastructure enhancements), and deliver net gains. Providing any recommendations within the HRA are incorporated into the submission version of the Neighbourhood Plan, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects.

Uncertain effects are considered likely in respect to climate change and flood risk. The Neighbourhood Plan has the potential to lead to positive effects through supporting proposals that promote the inclusion of low carbon technologies and the use of local and traditional building materials, encourage sustainable and active travel, and proactively respond to the potential impacts of climate change through the implementation of appropriate drainage solutions. However, it is recognised that new development would lead to inevitable increases in greenhouse gas emissions due to an increase in the built footprint of the neighbourhood area.

The Plan also makes provision for transportation; encouraging proposals which would deliver new and enhanced public rights of way and improvements to the local transport network. This will allow for safe and active transportation around the neighbourhood area and better access to locations further afield. As such, minor long term positive effects are anticipated for transportation through the implementation of the Neighbourhood Plan.

It is expected the Neighbourhood Plan will bring forward minor long term positive effects for land, soil, and water resources in the neighbourhood area by incorporating several provisions which will help support the capacity of the landscape to regulate soil and water quality. Whilst the proposed site allocation will potentially result in the permanent loss of areas of productive agricultural land, opportunities to meet housing needs purely through the redevelopment of brownfield land within the neighbourhood area are relatively limited.'

- 6.15 Section 4 of the Report considers reasonable alternatives and assesses the following options:
- Option A: Delivery of new housing through an allocation at Site BD12;
 - Option B: Delivery of new housing through an allocation at Site BD13;
 - Option C: Delivery of new housing through allocations at Site BD6, Site BD8 and Site BD12;
 - Option D: Delivery of new housing through allocations at Site BD6, Site BD8, Site BD9 and Site BD12; and
 - Option E: Delivery of new housing through allocations at Site BD9 and Site BD13. (These sites are West Suffolk Council's preferred site options).
- 6.16 The preferred approach identified in the Report is Option C – the delivery of 165 new houses through allocations at Site BD6, Site BD8 and Site BD12. The report comments that the preferred approach was informed by the various surveys and evidence base documents prepared to support the Plan (up to that time), responses from community consultation events, and the SEA findings.
- 6.17 I comment on the approach taken in the part of Section 7 of this report which addresses the Plan's proposed strategic allocation at Barrow Hill (Policy BCD2).

Habitats Regulations Assessment

- 6.18 BcDPC also commissioned a Habitats Regulations Assessment (HRA) of the Plan. The report (July 2024) is very comprehensive. It assesses the impact of the policies in the Plan on the following protected sites:
- Breckland SPA;
 - Breckland SAC;
 - Rex Graham Reserve SAC; and
 - Chippenham Fen SAC and Ramsar sites.
- 6.19 The HRA screening exercise undertaken in Table 3 identifies that three BCDNP housing policies (BCD2, BCD3, and BCD4) may have likely significant effects on the Habitats sites due to urbanisation, recreational pressure, air quality, water quality, habitat fragmentation, and hydrological changes (including water abstraction). The HRA screening exercise undertaken in Table 3 identifies a further BCDNP employment policy (BCD7) may have a likely significant effect on the Habitats sites due to air quality and water quality.
- 6.20 An Appropriate Assessment was undertaken of these policies. Following the Appropriate Assessment, two recommendations were made in the report to improve the policy framework provided in the Plan:
- Policy BCD2, Policy BCD3 and Policy BCD4 are updated to include a requirement for applicants to adhere to Policy SP7 (now SP10) of the WSDLP; and
 - Policies BCD2, BCD3 and BCD4 are amended specifically reference complying with the WSDLP Policy SP8(now SP11) and any requirements of a future West Suffolk Recreational Avoidance and Mitigation Study.
- 6.21 The HRA concludes that subject to recommendations made in this assessment, the Plan will contain sufficient policy framework to ensure no adverse effects on the integrity of Habitats sites will occur in isolation or in combination with other projects and plans.
- 6.22 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns on this matter. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with the relevant regulations.

Human Rights

- 6.23 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.24 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the format of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. BcDPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning practice guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on each of the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Parts 1-4)

- 7.8 The Plan is organised and presented in a very effective way. It makes an appropriate distinction between the policies and their supporting text. The overall format of the Plan, and the associated use of colour, maps and excellent photographs results in a very attractive and legible document. If the Plan is made, it will sit comfortably as part of the overall development plan.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.10 The Introduction (Section 1) comments about the national neighbourhood plan agenda and defines the neighbourhood area (in Figure 1). The Plan period is defined separately in the Foreword. For clarity I recommend that the Plan period is included on the front cover of the Plan

On the front cover add '2019-2041' after the Plan name.

- 7.11 The Introduction also comments about:
- the Plan preparation process;
 - community engagement; and
 - the Evidence base of the Plan.

- 7.12 Section 2 comments about the planning policy context within which the Plan has been developed. It addresses both national and planning policy to good effect. The Local Plan has been adopted since the Neighbourhood Plan was prepared and submitted. I recommend later in this report that the section on the Local Plan is updated.
- 7.13 Section 3 provides information about the neighbourhood area. It includes interesting and comprehensive details which help to set the scene for the eventual policies. It is a compelling element of the Plan.
- 7.14 Section 4 also comments about the Plan's Vision and key objectives. The Vision is as follows:

'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, with Denham as a completely separate, small rural village.

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 accounts 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.

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 the Parishes of Barrow and Denham continue 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.

Hand in hand with the chosen growth strategy, the Vision additionally seeks to protect the undeveloped rural countryside around the Parishes of Barrow (including Burthorpe) and Denham to ensure that it is suitably maintained in its present condition and so preserved for future generations.'

- 7.15 The Plan then advises that this vision translates into six sets of Key Objectives 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.

- 7.16 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Adoption of the West Suffolk Local Plan

- 7.17 An important element of the examination of the Plan has been that the West Suffolk Local Plan has been adopted since the Plan was prepared and then submitted. On the one hand, BcDPC has been entitled to produce the Plan at a time as it saw fit to do so. However, on the other hand, the West Suffolk Local Plan is now part of the development plan against which the submitted Plan falls to be assessed against the basic conditions (as addressed in full in paragraph 6.2 of this report). In this context the adopted Local Plan clarifies the overall level of housing growth throughout the district and identifies related housing allocations.
- 7.18 In this broader context the submitted Plan includes BcDPC's proposals for the allocation of land for mixed development off Barrow Hill (Policy BCD2). In its response to questions which I raised in the clarification note on this matter (and addressed in greater detail later in this report) BcDPC advised that the proposed site was being promoted as an alternative to the strategic allocation at Bury Road, Barrow (Policy AP24) in the Local Plan. BCDPC also expressed concern that WSC's proposed main modifications (undergoing consultation at that time), could not be relied upon until the Inspectors consider the representations received. It was the combination of these matters which prompted me to suspend the examination of the Plan until the situation was clear. Given the very advanced nature of the emerging Local Plan at that time, I also concluded that it would be appropriate to examine the Plan against an up-to-date development plan rather than a more dated version.
- 7.19 This sequence of events underpins several of the recommended modifications to policies (in the neighbourhood plan) in this section of the report.

Policy BCD1 – The Spatial Planning Strategy

- 7.20 As the title suggests, this policy seeks to establish a spatial strategy for the parish. It is based around the proposed allocation at land at Barrow Hill (as set out in Policy BCD2). The Plan advises that the general approach to planning strategy responds to the status of Barrow as a Key Service Centre in the settlement hierarchy and reflects the need to maintain the long-term vitality and viability of existing local services.
- 7.21 The policy also advises that additional new windfall development will be primarily focused within the defined Village Settlement Boundary of Barrow. It then comments that outside the Settlement Boundary priority will be given to protecting and enhancing the surrounding countryside from inappropriate forms of development.
- 7.22 In general terms the policy takes an appropriate approach in seeking to concentrate new development in Barrow. This will ensure that such development will be sustainable and have ready access to the commercial and community facilities in the Key Service Centre.

- 7.23 The policy overlaps with Policy BCD2 which proposes the allocation of land off Barrow Hill for mixed use development. I have recommended that Policy BCD2 is deleted from the Plan. The details are set out in paragraphs 7.27 to 7.44 of this report.
- 7.24 In these circumstances I recommend that Policy BCD1 retains its submitted structure and that the allocated sites in the Local Plan replace the references to the site off Barrow Hill in the first part. I also recommend consequential modifications to the supporting text.
- 7.25 In general terms, I am satisfied that the second part of the policy takes an appropriate approach towards development proposals outside the Settlement Boundary. Nevertheless, I recommend that the policy is recast so that it relies on the application of existing national and local planning policies and other policies in the Plan. This avoids the approach taken in the submitted Plan which attempts to provide a definitive list of proposals which will be supported outside the Settlement Boundary. Plainly no list can be definitive, and national and local planning policies may change in the Plan period.
- 7.26 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

'The neighbourhood area will accommodate strategic development in accordance with the designation of Barrow as a Key Service Centre in the Local Plan settlement hierarchy. Apart from the strategic site allocations in the West Suffolk Local Plan (Policies AP24 and AP25), windfall development should be focused within the defined Settlement Boundary of Barrow.

Outside the Settlement Boundary, priority will be given to protecting and enhancing the surrounding countryside from inappropriate forms of development. Development proposals will only be supported where they accord with national or local planning policies for the countryside and with other relevant policies in this Plan.'

Replace BCD1.1 with:

'This Plan seeks to continue the approach taken in national and local planning policies of promoting sustainable development in locations which have ready access to commercial and community facilities. As such the Plan sets out to consolidate the position taken in the West Suffolk Local Plan of concentrating new development in Barrow (and which includes the allocation of two strategic site in Policies AP24 and AP25). Nevertheless, the Plan recognises that there may be situations where it is necessary for some forms of development to take place outside of the defined Settlement Boundary. However, such development will be mainly limited to forms of development which are essential for the operation of agriculture, horticulture, forestry, outdoor sport and recreation and other uses that may need to be in the countryside. This relates to national and local planning policies.'

Replace BCD1.2 with:

'This strategic approach does not restrict the conversion of existing agricultural buildings to other appropriate development uses, where individual proposals are in accordance with the criteria set out in Policy BCD3 of this Plan and other adopted local planning policies for rural conversions.'

Policy BCD2 – Strategic Site Allocation: Land at Barrow Hill

- 7.27 This policy is a key element of the Plan. It advises that land to the east and west of Barrow Hill and land south of Barrow Forge, collectively known as Land at Barrow Hill, is allocated in the Plan period for high quality mixed-use development. It also comments that the development of the 13.5-hectare combined site will be undertaken in accordance with the concept diagram set out in Figure 4.
- 7.28 The policy includes a series of development criteria which are underpinned by the details in the supporting text.
- 7.29 The policy is supported by the Site Options and Assessment Report and the Environmental Report (ER). The former report identified that two sites are suitable for allocation in the Plan and that a further four sites are potentially suitable for allocation. BD6 – Land east of Barrow Hill and BD12 – Land west of Barrow Hill are two of the four potentially suitable for allocation identified in the report.
- 7.30 Paragraph 6.9 of the report concludes that from the shortlist of potentially suitable sites, the Neighbourhood Planning Group, in conjunction with BcDPC, should engage with WSC and the community to select sites for allocation in the Plan which best meet community needs and plan objectives. Paragraph 6.10 provides advice on the way in which that task should be undertaken.
- 7.31 The ER undertakes a comprehensive assessment of five spatial options. The outcome was that the requirement for 165 homes should be met through the combination of sites proposed through Option C (Site BD6, Site BD8, and Site BD12 off Barrow Hill). The Report comments that this preferred approach has been informed by the various surveys and evidence base documents prepared to support the Plan, responses from community consultation events, and the SEA findings. The overall conclusions of the ER have been set out in Section 6 of this report.
- 7.32 Ceres Property (on behalf of the site owners) support the proposed allocation of the site. The representation includes a comprehensive assessment of the proposed allocation against the basic conditions. It concludes by commenting that the ER demonstrates that the Plan, with BCD2 as a strategic allocation, is underpinned by a commitment to sustainability, environmental protection, and community well-being.
- 7.33 Bloor Homes is involved in the proposed development of the strategic allocation (AP24) in the Local Plan. It objects to the proposed allocation of land at Barrow Hill in the neighbourhood plan and offers detailed comments about the development of the Plan, its evidence, and the preparation of the Site Options Report and the ER.

7.34 Several local people have objected to the proposed allocation at Barrow Hill. The issues raised include:

- the most sustainable sites have not been chosen;
- the ER contains errors, especially in respect of the Local Plan allocation at Bury Road;
- it is illogical to reject the Bury Road site because of concerns about coalescence;
- there is no evidence about a formal agreement between the three owners of the proposed Barrow Hill site;
- the preferred site is unnecessarily large;
- information about the Local Plan has been omitted;
- the proposal for a care home on the site is not evidence-based or sustainable;
- the proposed Community Fund is not appropriately detailed; and
- concerns about the extent to which due process has been followed.

7.35 In the earlier parts of the examination before the Local Plan was adopted I sought advice from BcDPC about the extent to which it had prepared its Plan to ensure that it was complementary to the emerging Local Plan. In its response to the clarification note BcDPC commented that:

'The spatial strategy of the Neighbourhood Plan (NP) was conceived approximately three years ago and ratified in October 2022, at a time when the West Suffolk emerging Local Plan (eLP) was at an early stage in its development. The single strategic site choice made by the Parish Council was independently considered at that time and not influenced by the site options at Bury Road selected in the eLP. The NP has therefore not sought to alter its preferred spatial strategy for Barrow to align with alternative site selections made in the emerging Local Plan (eLP) as that plan has evolved. The NP meets all the relevant basic conditions when tested against the existing Development Plan. However, the evidence informing the eLP process indicates that additional housing growth of around 165 new homes is needed in Barrow during the plan period and the emerging NP responds to this as a relevant consideration, albeit with an alternative of strategic site location.'

7.36 I also sought advice about the extent to which the development of the allocated site in the Plan is intended to be in addition to the proposed housing allocations (Policies AP24/25) in the (then) emerging Local Plan or an alternative approach to the development of those sites. In its response BcDPC advised that:

'During 2022, 2023 and 2024, the Parish Council sought to engage with West Suffolk Council (WSC) to encourage the harmonisation of the strategic draft residential allocation in the eLP with that of the emerging NP. The choice of strategic site location made under policy BCD2 is a local decision, which has been soundly considered, and the Parish Council hoped that this would be an influential factor in the choice of strategic site for Barrow in the eLP. For the avoidance of doubt, the site shown in the eLP has always been intended to be the single strategic allocation for Barrow and was not purposely intended to be a site additional to the site now selected at Bury Road in the eLP. The fact that both draft allocations exist is more reflective of the desire of

WSC to forge ahead with its own strategic site choice, in the knowledge that the Parish Council had selected an alternative site location in 2022.'

- 7.37 Planning practice guidance (ID:41-044-20190509) advises about the promotion of additional or alternative site allocations to those in a Local Plan as follows:

'A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy. Neighbourhood plans should not re-allocate sites that are already allocated through these strategic plans.'

A neighbourhood plan can also propose allocating alternative sites to those in a local plan (or spatial development strategy), where alternative proposals for inclusion in the neighbourhood plan are not strategic, but a qualifying body should discuss with the local planning authority why it considers the allocations set out in the strategic policies are no longer appropriate.'

- 7.38 The Plan provides little if any information about the way in which BcDPC has addressed these important elements of planning practice guidance. The key dates in the preparation and submission of the two plans for examination were as follows:

Neighbourhood Plan

- Site Options and Assessment September 2021
- Pre-submission consultation September-October 2023
- Environmental Report September 2024
- Submission October 2024

West Suffolk Local Plan

- Issues and Options consultation October-December 2020
- Preferred Options consultation May-July 2022
- Regulation 19 Plan published January 2024
- Submission to government May 2024

- 7.39 Plainly WSC and BcDPC have taken different views on the location for strategic growth in the neighbourhood area, and I have noted BcDPC's response to the clarification note in paragraph 7.36 of this report. It is also clear that BcDPC had been addressing the issue since it received the Site Options and Assessment report in 2021. Nevertheless, the ER of the neighbourhood plan was prepared (in September 2024) and the Plan was submitted (in October 2024) in the full knowledge of the proposed strategic allocations in the Regulation 19 version of the Local Plan (January 2024) and the subsequent submission of the Plan (in May 2024). There is no evidence that BcDPC carried out the requirements of the second part of PPG ID:41-044-20190509 (paragraph 7.37 of this report).

- 7.40 The ER provides comprehensive details about selection of the Barrow Hill site (as pursued in this policy). Nevertheless, it provides no assessment of the extent to which

the proposed allocation was preferable to the Bury Road allocation in what was at that point the submitted version of the Local Plan.

- 7.41 Similarly there is no evidence in the submitted Plan that the Local Plan allocation at Bury Road, Barrow (Policy AP/24) is not deliverable. Plainly the Local Plan Inspectors' report was not available when the neighbourhood plan was submitted. Nevertheless, that report does not question the deliverability of that site.
- 7.42 BcDPC's response to the clarification note advises that the proposed allocation in the neighbourhood plan is an alternative to that included in the Local Plan rather than additional development. As such the first paragraph of Planning practice guidance ID:41-044-20190509 is not relevant. Nevertheless, the ER did not assess the environmental appropriateness of the proposed allocation of the Barrow Hill site in addition to the strategic allocations in the Local Plan. Plainly such a scenario would result in a significant increase in housing development in the parish. Similarly, the ER did not test the impact of this scenario on traffic capacity/safety and infrastructure provision.
- 7.43 I have considered these issues very carefully. On the one hand Planning practice guidance provides the opportunity for alternative allocations to be proposed in a neighbourhood plan to those in a Local Plan, and an opportunity for a neighbourhood plan to provide a higher level of development than that proposed in a local plan. On the other hand, the submitted neighbourhood plan provides no compelling evidence for its proposed alternative housing allocation to that in the now-adopted Local Plan. Furthermore, the submitted ER has considered the environmental impact of up to 165 houses given that the Plan's ambition was not to promote the Barrow Hill site (Policy BCD2) in addition to the Local Plan allocation at Bury Road. In all the circumstances I recommend the deletion of the policy and the supporting text.
- 7.44 My recommended modifications to Policy BCD1 draw attention to the strategic allocation at Bury Road in the Local Plan. There is no need for the Plan to comment further on the site, and Policies AP24 and AP25 of the Local Plan provide an appropriate level of information to secure policy-compliant developments on the two sites.

Delete the policy

Delete BCD2.1 to BCD2.13

Delete Figures 4 and 5

Policy BCD3 - Non-Strategic Housing Delivery

- 7.45 The supporting text advises that in addition to the strategic site allocation for up to 165 new homes, the Plan also provides for a moderate windfall allowance during the Plan period. It comments that this will help to maintain a strong community, by facilitating a mix of housing types and tenures within the existing settlement limits of Barrow and Burthorpe. The Plan identifies eight criteria with which development proposals should comply.

- 7.46 The policy also comments about proposals for the conversion of redundant or disused rural buildings, for residential use outside of the defined Settlement Boundaries of Barrow and Burthorpe.
- 7.47 The policy follows on from the approach taken in Policy BCD1. It provides specific details for the development of infill development sites. As with Policy BCD1, it takes an appropriate approach in seeking to concentrate new development in Barrow.
- 7.48 I recommend that the first and second parts of the policy are modified to follow the approach taken towards Policy BCD1 earlier in this report. In addition, I recommend that a proportionate element is introduced into the second part of the policy. This will acknowledge that not all development proposals will impact on the range of criteria linked to this element of the policy.
- 7.49 I also recommend specific modifications to the wording used in several of the criteria. Whilst they retain BcDPC's intentions, the modifications will bring the clarity required by the NPPF and allow WSC to apply their contents through the development management process. The recommended modification to the first criterion removes the threshold of five homes and focuses on the way in which any proposal would respond positively to the size and capacity of the site and ensure that its density relates to the character of the immediate area. This approach will acknowledge Barrow's role as a Key Service Centre in the WSC settlement hierarchy.
- 7.50 The recommended modifications to criteria vii and viii follow the suggestions made by WSC to ensure a better relationship with Local Plan policies.
- 7.51 I recommend that the final part of the policy is deleted given that it effectively repeats the second part of the modified Policy BCD1. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the first part and the opening element of the second part of the policy with:

'In the Plan period the neighbourhood area will primarily accommodate new housing delivery at the strategic allocations (Policies AP24 and AP25) in the West Suffolk Local Plan.

In addition to the strategic site allocations, this Plan provides for small infill developments, including the redevelopment of existing brownfield sites to come forward for new homes, on suitable sites, within the defined village Settlement Boundaries of Barrow and Burthorpe. As appropriate to their scale and nature, any such developments should meet all the following development criteria:'

Replace i. with: 'Infill development should respond positively to the size and capacity of the site and ensure that its density relates to the character of the immediate area.'

Replace v. with: ‘Where character buildings are converted from other uses, they should retain and, where practicable, restore existing architectural or vernacular features.’

Replace vi. with: ‘Wherever practicable development proposals should seek to retain all existing healthy trees and hedgerows on the site or provide compensatory planting where the removal of any trees and/or hedgerows is unavoidable.’

Replace vii. with ‘Information to inform an appropriate assessment will be required with any planning application for built development within the 1500 metre (primary) buffer around Breckland SPA in accordance with policy SP10.’

Replace viii. with: All new development which would result in a net increase in dwellings must mitigate for its recreational effects on Breckland (SPA and SAC) in accordance with WSLP Policy SP11.

Delete the final part of the policy.

Policy BCD4 – Special Needs and Local Affordable Housing

- 7.52 This policy comments about new development proposals to meet special housing needs, including accommodation for the elderly and/or vulnerable groups, outside the settlement boundaries of Barrow and Burthorpe and for small scale, local, rural affordable housing proposals. It offers support for such proposals where they meet a series of criteria.
- 7.53 In general terms the policy takes a positive approach to these important matters. However, there is a significant degree of overlap between the initial elements of the policy and the various criteria. In this context I recommend that the approach taken is recast and consolidated. This will ensure that the criteria flow naturally from the opening elements. The thrust of the policy remains unaffected.
- 7.54 The recommended modifications to the final two criteria follow the suggestions made by WSC to ensure a better relationship with Local Plan policies.
- 7.55 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals to meet special housing needs, including accommodation for the elderly and/or vulnerable groups, and small scale, local, rural affordable housing proposals outside of the Settlement Boundaries of Barrow and Burthorpe will be supported where they meet the following criteria:

i. they 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

ii. they 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 definitions in Annex 2 of the NPPF.

iii. where specifically justified and to ensure viable delivery, a small percentage of market housing may be supported to facilitate appropriate affordable schemes

iv. they 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

v. they should be well-related to local services and can be accessed by sustainable transport modes.

vi. they should safeguard the existing settlement gaps between Barrow, Burthorpe and Denham or have any significant visual impact upon the surrounding countryside.

vii. they should deliver new landscaping and green infrastructure, including formal and informal public open space provision, in accordance with adopted Local Plan requirements, together with the creation of deliverable biodiversity and habitat enhancements.

viii. information to inform an appropriate assessment will be required with any planning application for built development within the 1500 metre (primary) buffer around Breckland SPA in accordance with policy SP10.'

ix. all new development which would result in a net increase in dwellings must mitigate for its recreational effects on Breckland (SPA and SAC) in accordance with WSLP Policy SP11.'

Policy BCD5 – New Development and High-Quality Design

7.56 This is another important policy in the Plan. It seeks to ensure that new development is well-designed and locally-distinctive.

7.57 The policy comments that proposals for all new development including new housing should demonstrate high standards of design and be of an appropriate gross internal floor area to satisfy prevailing Nationally Described Space Standards.

7.58 The policy also advises that the layout of new housing and other forms of development should not be dominated by roads/car parking and should reflect the settlement pattern of the area, with high levels of pedestrian permeability, in accordance with the Suffolk Guidance for Parking 2023 and the Suffolk Design for Streets Guide 2022 (or any successor documents). It also comments that proposals for affordable housing within developments must be fully integrated into the overall layout.

7.59 In general terms the policy takes a positive approach to design and has regard to Section 12 of the NPPF. In addition, it makes appropriate reference to the Suffolk

Design for Streets Guide 2022. In this broader context I recommend that the opening elements of the policy are recast so that they relate better to the development management process and incorporate general commentary on design and a separate section on residential development. I also recommend that both the policy and the supporting text draw attention to the Design Guidance and Codes (December 2020) which was produced as part of the wider preparation of the Plan.

- 7.60 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the initial three sections of the policy with:

‘Development proposals should demonstrate high standards of design and respond positively to the character and appearance of their immediate locations taking account of the Barrow-cum-Denham Design Guidance and Codes.

The layout of development proposals should reflect the settlement pattern of the area, with high levels of pedestrian permeability, in accordance with the Suffolk Guidance for Parking 2023 and the Suffolk Design for Streets Guide 2022 (or any successor documents). Development proposals should not be dominated by roads and/or car parking.

Proposals for housing development should incorporate an appropriate gross internal floor area to satisfy prevailing Nationally Described Space Standards. Proposals for affordable housing should be fully integrated into the overall layout of any associated housing development.

New homes should not 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, proposals for new homes should:’

After the first sentence of BCD5.1 add: ‘Detailed advice is included in the Design Guidance and Codes (December 2020)’

Policy BCD6 – Sustainable Design and Construction

- 7.61 The policy seeks to assist in the promotion of sustainable design and construction. It comments that proposals for all forms of new development should demonstrate high standards of sustainability and incorporate current best practice in energy conservation. It also advises that all buildings should incorporate sustainable design, construction, and energy efficiency measures, including where feasible, the use of ground or air source heat pumps, solar heating, photo voltaic systems or other energy efficiency technologies.
- 7.62 This is a good policy on sustainable design and construction which has regard to Section 14 of the NPPF and the Written Ministerial Statement (Planning: Local Energy Efficiency Standards Update) of December 2023. Within this broader context I recommend that the second part of the policy is modified so that it can be applied proportionately to the scale and nature of the development proposals. I also

recommend the deletion of the elements of the policy on EV charging and broadband access which are now addressed nationally by the Building Regulation. Finally I recommend that criterion v is recast so that it has the clarity required by the NPPF.

- 7.63 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the opening element of the second part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should meet the following relevant criteria:’

Delete iv

Replace v with ‘Proposals for new housing should make appropriate provision for home working.’

Policy BCD7 – Local Employment Strategy

- 7.64 This is a comprehensive policy on local employment. It includes the following elements:

- a general approach towards the retention of existing business and proposals for new small scale employment development;
- commentary about safeguarding employment allocation in former Local Plans; and
- commentary about the proposed employment elements of Policy BCD2.

- 7.65 The thrust of several important elements of this policy has now been overtaken by events. The two employment sites in Barrow in the now superseded local plan (RV4 and RV10) have been omitted from the recently adopted Local Plan and are no longer allocated. Land at RV4 is required for expansion of the primary school under Policy AP26 of the local plan. In addition, I have recommended the deletion of Policy BCD2 earlier in this report.

- 7.66 In all the circumstances, I recommend that the policy is recast so that it refers only to the more general elements of the submitted policy. In doing so I recommend that the first part of the modified policy refers to the criteria in Policy SP24 of the adopted Local Plan which addresses economic development and essential utilities in the countryside. I also recommend consequential modifications to the supporting text.

- 7.67 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

‘Proposals that would contribute towards the ongoing viability and retention of existing small businesses will be supported. Proposals for the development of small to medium scale new businesses in appropriate and sustainable locations will be supported where they comply with relevant criteria in Policy SP24 of the West Suffolk Local Plan.’

Insofar as planning permission is required, proposals for 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 will be supported. Proposals for the delivery of new and upgraded infrastructure to help further support remote working will also be supported.'

Restructure the supporting text so that it reads as follows:

'BCD7.1 to BCD7.3 (as submitted)

BCD 7.4 The NPPF also expects local planning policies for rural areas to support an appropriate mix of uses across an area to help minimise the number and length of journeys required for employment, shopping, leisure, and education. At the local policy level, the employment policies in the Local Plan provide importance guidance on the retention of existing business and the development of new enterprises

Delete BCD7.5 and 7.6

BCD 7.5 As set out in the Vision and Objectives section, the policy aspiration of this Plan is to support the viability and retention of existing small businesses and support further small-scale business creation in appropriate and sustainable locations. The local employment strategy is therefore to seek to safeguard all existing employment generating uses, with a general presumption against the loss of all existing or designated future employment land and premises.

Delete BCD7.8 and 7.9.'

Policy BCD8 – Support for New and Existing Community Facilities

- 7.68 The Plan advises that the context for the policy is that Barrow is a Key Service Centre and plays an important role in providing day-to-day services to the village and the local rural community. It then comments that the continuity of viable local services and facilities provides a vital role in preventing social exclusion and contributing to general health and wellbeing, including reducing the need to travel and that these key services also support the educational, spiritual, recreational, leisure and cultural needs of the local community.
- 7.69 This is a comprehensive policy on community facilities. It has regard to Section 8 of the NPPF. The existing range of community facilities reflects the identification of Barrow as a Key Service Centre in the Local Plan settlement hierarchy.
- 7.70 As submitted, the policy is wide-ranging and slightly unstructured. In this context I recommend that it is broken down into its separate sections.
- 7.71 The policy includes a paragraph on securing community funding. The approach is entirely appropriate. However, it describes a process rather and is not worded as a land use policy. As such I recommend that it is repositioned into the supporting text. As part of this process, I recommend that the examples highlighted in BcDPC's response to the clarification note should be included to provide a context to this matter.

- 7.72 The policy includes a significant level of detail and this results in a lengthy policy. As such I recommend that the range of additional community facilities that would be supported and the schedule of existing community facilities are repositioned into the supporting text (at BCD8.3 and BCD8.4 respectively).
- 7.73 The policy refers to the now superseded Policy DM41 (Community Facilities and Services) of the Joint Development Management Policies Document (2015). I recommend that the reference is revised to the relevant Local Plan policy. Given that the submitted policy and the relevant policy in the Local Plan (LP19) seek to achieve the same outcome in relation to proposals which would involve the loss of community facilities I recommend that the submitted policy simply refers to Policy LP19. Its added value will be the identification of community facilities in the neighbourhood area (in paragraph BCD8.6) and the first and third elements of the modified policy.
- 7.74 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘Proposals for new or expanded community services and facilities will be supported where they meet all relevant development management criteria. New community facilities should complement and where practicable enhance existing community facilities and be located to maximise co-location and accessibility by non-car modes.

Proposals that will result in the loss of a community facility or services which support a local community, or building which was last used for such purposes will be determined in accordance with the details in Policy LP19 of the West Suffolk Local Plan.

Where appropriate, other development proposals should demonstrate how they support and contribute towards the maintenance of viable community facilities.’

At the end of paragraph BCD8.3 add:

‘Where appropriate, the Parish Council will look to secure community funding in support of the delivery of new or expanded community services and facilities serving the Parishes of Barrow and Denham. Examples of current and proposed initiatives to which such community funding would be directed include upgrading the village Skatepark, protecting public grassed areas from vehicles, the installation of fencing around allotments to protect from deer, and resurfacing village pathways.’

At the end of paragraph BCD8.4 add:

‘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 (land for this purpose is reserved by Policy AP26 of the West Suffolk Local Plan)*
- *The provision of enhance school drop-off/ pick-up facilities*
- *New or improved sporting and leisure facilities*
- *Healthcare provision.'*

Replace paragraph BCD8.6 with:

'Development proposals that would result in a net loss of existing community facilities in Barrow will be determined against the details in Policy LP19 of the West Suffolk Local Plan. The existing key services and facilities to which Policy BCD8 apply are mostly located in Barrow, and are:

- *Barrow VC Primary School*
- *Village Nursery (private)*
- *Post Office*
- *Village Hall & Meeting Room*
- *The Three Horseshoes in The Street and The Weeping Willow on Bury Road*
- *Convenience Shops*
- *Sporting Goods/Country Shop*
- *Takeaway Restaurant*
- *Health Centre*
- *Play Area*
- *Hairdressers*
- *Churches.*
- *Mill Lane Allotments at Mill Lane*
- *Allotments in Burthorpe*
- *Orchard to the rear of the Three Horseshoes PH*
- *Feltons Orchard to the North of Bury Road.'*

Policy BCD9 – Support for New Sport and Recreation Facilities

- 7.75 The policy comments that 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 individual merits. It also advises that in considering any such applications, BcDPC will take into account evidence of need for the specific facility proposed and the sporting benefits to be provided. It then advises that any such proposals will also be expected to meet seven criteria.
- 7.76 I note that paragraph BCD9.1 refers to the development of land off Barrow Hill (Policy BCD2). I sought advice from BcDPC that if the development of that site was the driving force for the policy the extent to which it would appropriate for the Plan directly or indirectly to support the development of BCD2 for residential and employment uses if it is anticipated that it will not be able to accommodate its recreational needs on the allocated site. I also sought advice about the extent to which it is anticipated that proposals for large scale sporting and recreational facilities will come forward in the Plan period,

7.77 In its response to the clarification note BcDPC advised that

‘For the avoidance of doubt, the development proposed under Policy BCD2 will be expected to deliver the required quantum of public open space, as set out in relevant guidance at the time of determination sufficient to meet all of its own recreational needs, within the boundaries of the allocation site. However, the Parish Council have identified a need for additional strategic recreational provision for more organised sporting activity, which is unlikely to be able to be accommodated on the BCD2 site in circumstances where the open space requirement for Site BCD2 has already been met. Accordingly, Policy BCD9 supports the principle of new development proposals for larger scale sporting and recreational needs, outside of the defined settlement boundaries, coming forward where this will result in further positive investment in the Parish and the balance of any additional sporting benefits provided clearly outweighs any harm to the character and setting of the site in question.’

7.78 I have considered these matters very carefully both generally, and in the context of my recommended modifications to Policies BCD1 and BCD2. In all the circumstances I recommend that the policy and the supporting text are deleted. I have come to this judgement for two related reasons as follows:

- the recommended deletions of Policies BCD1 and BCD2 take away a key purpose of the policy; and
- there is nothing in Policy AP24 of the Local Plan (on the development of the Bury Road site) that advises that additional open space/recreational provision is required in the parish.

7.79 In coming to this decision I have also taken account of the contents of Policy LP20 of the adopted Local Plan. It addresses very similar criteria to those in the submitted policy and would provide helpful guidance for any proposals for additional sport and recreational facilities in the neighbourhood area.

Delete the policy

Delete paragraphs BCD9.1 to 9.4

Policy BCD10 – Ecology and the Natural Environment

7.80 The policy advises that development proposals should seek to conserve or enhance the biodiversity and geological interests of the area and ensure that protected species and existing habitats will be protected and, where possible, enhanced.

7.81 The policy takes a positive approach towards ecology and the natural environment and has regard to Section 15 of the NPPF. In this broader context I recommend that the opening element of the policy is expanded so that it is consistent with the NPPF, legislation and Local Plan policies. I also recommend that the final part of the policy should be applied proportionately to the scale and nature of the development proposals. This will allow WSC to apply its provisions through the development management process. I also recommend the deletion of the unnecessary reference to the neighbourhood area in the policy. Otherwise, the policy meets the basic conditions.

It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the first part of the policy with:

‘Development proposals should protect and enhance biodiversity including existing habitats and species. Development proposals should demonstrate that there will no unacceptable net impacts upon the biodiversity and ecology of the natural environment. Development proposals which would result in significant harm to biodiversity, should have regard to the ‘mitigation hierarchy’ of avoidance, mitigation, and compensation, to be supported.

Replace the opening element of the second part of the policy with: ‘As appropriate to their scale, nature and location, development proposals should also meet the following relevant criteria:’

Policy BCD11 – Protection of Local Heritage Assets

- 7.82 This policy sets out a series of criteria for determining proposals affecting listed buildings. I am satisfied that the policy takes an appropriate approach towards listed buildings and has regard to Section 16 of the NPPF. Nevertheless, I sought advice from BcDPC on the extent to which the policy brings any added value beyond national and local policies. In its response to the clarification note it commented that:

‘this policy is conceived with major development in mind, however it is agreed that it should be applied proportionately. The general approach taken by this policy reflects the consultation comments received from Historic England, which mirrors national guidance.’

- 7.83 I have considered these matters carefully. On the one hand BcDPC has an ambition to safeguard the listed buildings in the neighbourhood area. However, on the other hand, the policy does not have a distinctive local dimension and restates national policy. In all the circumstances I recommend the deletion of the policy and the supporting text.

Delete the policy

Delete paragraphs BCD11.1 to 11.5

Policy BCD12 – Active Transport and Accessibility

- 7.84 The policy comments that the Plan seeks to minimise the impact of future new development on the existing local highway network, by encouraging walking, cycling and other non-car modes, including public transport to other areas, beyond the parish. It also advises that it seeks to promote and encourage measures to improve the wider safety of the roads and footways throughout the parish, including the enhancement of local cycle routes. Finally, it advises that the Plan seeks to encourage proportionate investment in new public rights of way within Barrow, including measures to enhance pedestrian safety and facilitate further safe crossing areas.

7.85 In general terms the policy takes an appropriate approach to these matters and has regard to Sections 8 and 9 of the NPPF. Within this broader context I recommend the following modifications to bring the clarity required by the NPPF and to allow WSC to be apply to apply the policy through the development management process:

- breaking the initial part of the policy into its separate elements;
- applying the element of the policy about major development proposals in a proportionate way;
- ensuring that the detailed criteria are applied where applicable to the proposal;
- ensuring that the criteria flow more naturally from the opening element of the third part of the policy (as proposed to be modified);
- relating the second standard to Suffolk County Council parking standards rather than that in the submitted policy which seeks to anticipating lesser standard over time; and
- the deletion of the rather vague fourth criterion and its repositioning (with modifications) into the supporting text.

7.85 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals should include suitable mitigation for their impacts on the existing local highway network, by encouraging walking, cycling and other non-car modes, including public transport.

As appropriate to their scale, nature and location, major development proposals should incorporate investment in new footpath connections, including measures to enhance pedestrian safety and local cycle routes.

In addition, and where applicable, development proposals should meet the following criteria:

- **incorporating the promotion of sustainable transport choices with a clear order of priority, sequentially reducing the need to travel, encourage walking and cycling, encourage public transport and shared transport, and facilitating sustainable levels of private transport;**
- **delivering on plot car parking provision in relation to the Suffolk County Council Parking Standards; and**
- **making 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.’**

In paragraph BCD12.1 replace ‘Kennet’ with ‘Kennett’

At the end of paragraph BCD12.1 add: ‘The Parish Council will seek to secure community funding for the delivery of walking, cycling and other non-car modes,

including public transport, through contributions to improved facilities serving the parishes of Barrow and Denham.'

At the end of paragraph BCD12.4 add: 'Wherever practicable, development proposals should demonstrate that they are sufficiently flexible to respond to changes in transport technology in the Plan period or can be adapted to support, enhanced smart mobility services.'

Monitoring and Review

- 7.86 The Plan takes a positive approach to these matters.
- 7.87 I recommend that its opening element is modified so that it reflects the recent adoption of the West Suffolk Local Plan.

Replace the opening section with:

'The Barrow cum Denham Neighbourhood Plan will run concurrently with the West Suffolk Local Plan and other relevant documents which form a part of the development plan.'

Other Matters – General

- 7.88 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for WSC and BcDPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – The adoption of the West Suffolk Local Plan

- 7.89 The recent adoption of the Local Plan has resulted in several general elements of the Plan becoming out-of-date. I recommend that the relevant sections of the Plan are updated accordingly. This general recommended modification overlaps with some of the specific WSC comments addressed in the next section of this report.

Update any relevant sections of the general text of the Plan to reflect the adoption of the West Suffolk Local Plan in July 2025.

Other Matters – Specific

- 7.90 WSC has raised a series of issues on the Plan. Those which relate to specific policies have been addressed earlier in the report.

7.91 WSC also raise a more general range of issues. In the main, they propose updates or factual corrections to the Plan. In this context I recommend that the following matters are addressed/incorporated in the Plan (using WSC's reference numbers in its representation):

- General (two separate comments)
- Plan images
- Paragraph 2.9
- Page 17/18/19
- Paragraph 2.21
- Paragraph 2.22
- Page 20
- Paragraph 3.4
- Paragraph 3.69

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2041. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area.
- 8.2 Following the independent examination of the Plan, I have concluded that the Barrow cum Denham Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to West Suffolk Council that, subject to the incorporation of the modifications set out in this report, the Barrow cum Denham Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved on 26 June 2019.
- 8.5 I am grateful to everyone who has contributed to this examination.

Andrew Ashcroft
Independent Examiner
22 September 2025