

# GLEMSFORD NEIGHBOURHOOD PLAN

2023-2037



## CONSULTATION STATEMENT

February 2025

Glemsford Parish Council





# CONTENTS

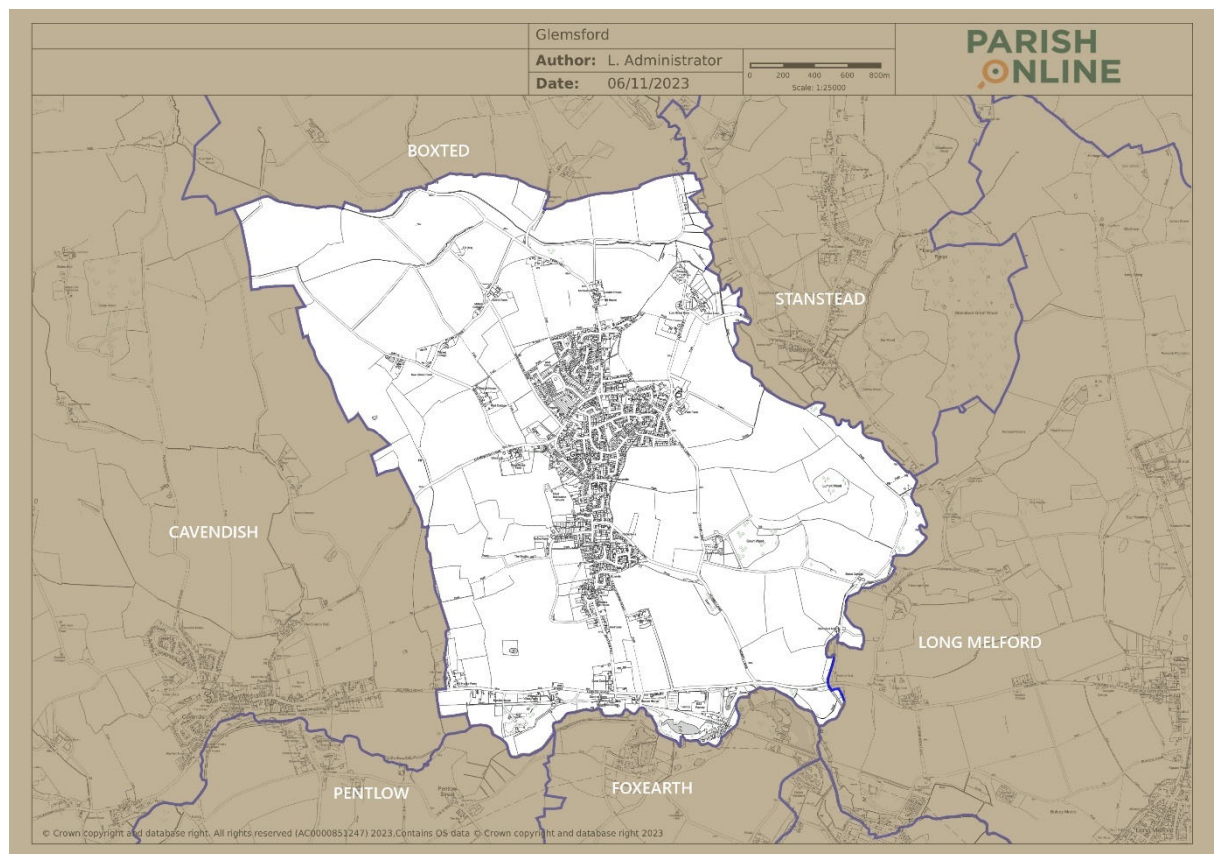
1. Introduction	3
2. Background to the Preparation of the Neighbourhood Plan	4
3. Regulation 14 Pre-Submission Consultation	6
4. Pre-Submission Consultation Responses	7
Appendix 1 - Pre-submission consultation leaflet	8
Appendix 2 – November 2023 Drop-in Event Display	16
Appendix 3 – Statutory Consultees Notified of Regulation 14 Consultation	32
Appendix 4 – Statutory Consultee Consultation Notice	34
Appendix 5 – Summary of Responses to Consultation Questions	35
Appendix 6 - Responses received to Pre-Submission Consultation, Responses to Comments and Proposed Changes	40
Appendix 7 - Schedule of Post Pre-Submission Consultation Modifications	113

## 1. Introduction

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended) in respect of the Glemsford Neighbourhood Plan.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
  - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted; and
  - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the Neighbourhood Plan are the culmination of engagement and consultation with residents of Brettenham as well as other statutory bodies. This has included a household survey and consultation events at appropriate stages during the preparation of the Plan.

## 2. Background to the Preparation of the Neighbourhood Plan

- 2.1 The Neighbourhood Plan has been prepared in accordance with the requirements of the Government's Neighbourhood Planning Regulations and, in particular, has involved considerable local community engagement to gather evidence for the content of the plan and later inform the plan's direction and policies. The content of the Neighbourhood Plan has been generated and led by the community and shaped by results of surveys and drop-in events, to ensure that the Neighbourhood Plan reflects the aspirations of the community.
- 2.2 In 2017 the Parish Council took the decision to prepare a Neighbourhood Plan and applied to Babergh District Council to designate the parish as a Neighbourhood Area for the whole parish, as identified on Map 1. That designation was confirmed on 27 October 2017 and since that time a small group of Parish Councillors and volunteers has contributed to the preparation of the Plan supported by Places4People Planning Consultancy and grants and support provided through the government neighbourhood planning support programme.



**Map 1 - The Neighbourhood Plan Area**

- 2.3 The Neighbourhood Plan has been prepared in accordance with the requirements of the government's neighbourhood planning regulations and is supported by a number of evidence documents, available on the Neighbourhood Plan pages of the Parish Council's website.

**Village Survey:** Carried out in Autumn 2018, there were 806 completed or partially completed questionnaires returned. The survey covered the environment, health and wellbeing, transport, village facilities, village issues, village activities and village management. The results of the survey have informed the content of the

Neighbourhood Plan and referred to across the Plan.

**Drop-in Feedback Event:** A drop-in event was held at the Village Hall in August 2019 to provide feedback on the outcomes of the Residents' Survey and an update on other background work on the Plan.

**Glemsford Landscape Appraisal:** The main body of the village is located in an elevated position above the valleys of the Stour and Glem rivers. To ensure that development proposals take account of the landscape within which the village sits, a Landscape Appraisal was commissioned to provide guidance on ability of the landscape to accommodate development.

**Views Assessment:** There are many fine and long-distance views from publicly accessible locations within the parish that could be impacted by development proposals. An appendix to the Landscape Appraisal specifically assessed important views, prepared to identify the most important views within the parish to provide guidance when new development is proposed.

**Local Green Spaces Assessment:** There are a number of green spaces in the parish that qualify for designating as "Local Green Spaces" as defined by the government's National Planning Policy Framework. The Local Green Spaces Assessment identifies how those designated in the Plan meet the criteria for designation.

**Glemsford Design Guidelines and Codes:** As part of the government's neighbourhood planning support programme, a separate document has been prepared to provide design "codes" or guidance for development in Glemsford. As noted later in the Plan, development proposals will be expected to have regard to the content of the guidance, as appropriate to the nature and scale of the proposal.

**Site Options and Assessment:** In order to guide the location of housing development, an independent assessment of potential sites was prepared by consultants as part of the government's neighbourhood planning support programme. It assessed the suitability of sites that had been put forward by landowners for housing development.

**Site Masterplanning Guidance:** A further design guide has been prepared for the site that is proposed for housing development in the Plan. It identifies how the site should be developed to create a high-quality new housing area that minimises its impact on the character of the village.

All these reports are available separately to download on the Neighbourhood Plan pages of the Parish Council website.

- 2.5 On 12 September 2023 the Parish Council considered the draft Plan and approved it for the purposes on Pre-Submission consultation in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended). That consultation and its outcomes forms the main focus of this Consultation Statement.

### **3. Regulation 14 Pre-Submission Consultation**

- 3.1 The statutory consultation commenced on 11 November and lasted for eight weeks to 5 January 2024 (inclusive).

#### **How we publicised the consultation**

- 3.2 The consultation was publicised by a summary leaflet (reproduced in Appendix 1) that was distributed to every household and business in the parish. The leaflet summarised the main purpose and content of the Plan and ensured recipients were informed as to how the actual Plan could be viewed and how they could comment on it. The consultation was also launched with a well-attended drop-in event held at the Village Hall on 11 November. The display boards for the drop-in event are included as Appendix 2 of this Statement.
- 3.3 Hard copies of the Plan were made available to view at the drop-in event and to borrow from the Parish Council office at times identified on the leaflet. The Plan was also available to view and download on the neighbourhood plan pages of the Parish Council website. Both an online and paper comments form was produced, with paper copies of the form being available at the drop-in event and the Parish Council office.
- 3.4 At the start of the consultation, all the statutory Regulation 14 consultees, as advised by Babergh District Council, were consulted. The full list of bodies consulted is shown in Appendix 3 and the email content used to notify them is included at Appendix 4.
- 3.5 Details of the responses received during the pre-submission consultation period are detailed later in this Consultation Statement.



## 4. Pre-Submission Consultation Responses

- 5.1 A total of 34 people or organisations responded to the Pre-Submission Consultation as listed below.

The following individuals or organisations submitted comments:

J Aldous	R Newman
Cllr N Clarke, West Suffolk Council	Cllr J Nunn , Babergh District Council
L Crofton	L Pearce
M Crowley	R Plant
L Cunliffe	Cllr S Plumb, Babergh District Council
A Fanning	I Short
A Good	N Vyse
I Homer	J Webb
M Hyett	
P Jackson	

Stantec (on behalf of Bloor Homes)

Savills UK on behalf of Rainier Developments

Babergh District Council	Historic England
Suffolk County Council	Ministry of Defence
Anglian Water	National Gas
Environment Agency	Suffolk Wildlife Trust

Plus four anonymous responses

- 5.2 A summary of the responses to questions as to whether the individual policies, community aspirations and general content is illustrated in Appendix 5. A schedule of full comments, and the responses of the Parish Council to them, is set out in Appendix 6 of this Statement. It should be noted that not everyone responding to the consultation questions made comments As a result, the Submission version of the Neighbourhood Plan has been appropriately amended as identified in the "changes made to Plan" column of the Appendix. Further amendments were made to the Plan to bring it up-to-date and Appendix 7 provides a comprehensive list of all the modifications to the Pre-Submission Plan following consultation.



## Appendix 1 - Pre-submission consultation leaflet

# GLEMSFORD NEIGHBOURHOOD PLAN



### **Your chance to comment**

Public Consultation  
11 November 2023 - 5 January 2024

### **Village Drop-in Event**

Saturday 11 November between  
12 noon to 5.00pm  
Village Hall

Refreshments available



Glemsford Parish Council



In 2017 the Parish Council decided to prepare a Neighbourhood Plan to cover the whole of Glemsford parish. Since that time a small group of volunteers and Parish Councillors, assisted by professional consultants, have been working to gather information and views to inform the content of the Plan.

### **We are now consulting you on the Draft Plan – it's your chance to give us feedback**

Neighbourhood Plans are, when complete, part of the legal planning framework for an area and are used by district councils and Government planning inspectors when deciding planning applications. They provide a layer of local detail and proposals that supplement policies in district wide local plans.

We've now reached a major milestone and are consulting on the Draft Plan. Consultation commences on **11 November** and will last until **Friday 5 January**, an extended period of 8 weeks due to the Christmas holidays. You now have the opportunity to say whether or not you support the content of the Plan or would like to see some changes and so influence planning and development policy for Glemsford for the coming years.

The final page of this leaflet explains how you can comment.

**It is important that you use this opportunity to have your say, even if you're fully supportive of the Plan.**

The draft Plan provides a Vision, based on your views, about how Glemsford should look in the future:

#### **VISION**

**In 2037 Glemsford will be a place that has retained its village characteristics set in a high-quality landscape where services and facilities meet the day-to-day needs of residents and new development has protected and enhanced the historic and natural environment**

This will be delivered through a series of objectives and planning policies.

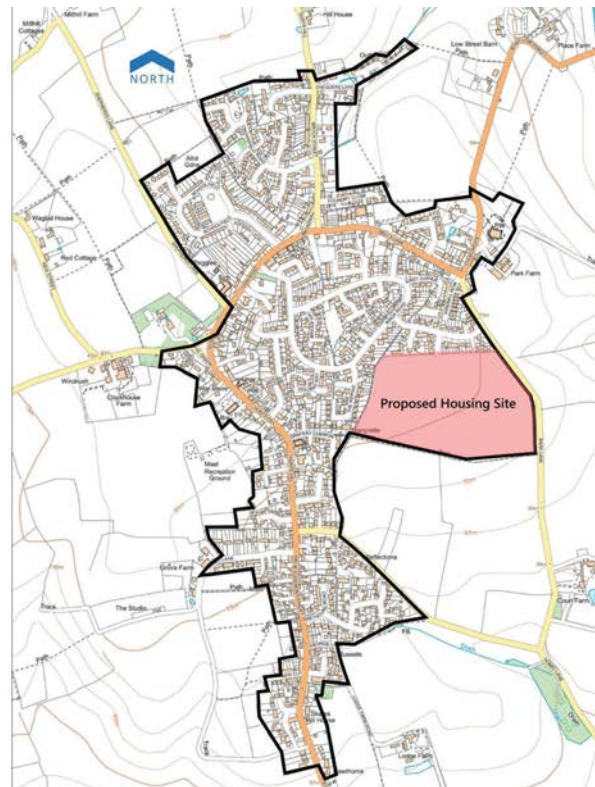
The draft Neighbourhood Plan covers seven themes and each theme forms a chapter for the Plan:





The Plan takes a balanced view on the location of new development, designating a Housing Settlement Boundary around the main village centre. It is based on Babergh's 2006 Local Plan but brought up-to-date to reflect the content of the Neighbourhood Plan. The map illustrates the Housing Settlement Boundary.

- Planning applications for development within this area will be supported where they do not have a detrimental impact on residential amenity, the natural and historic environment, infrastructure and highways.
- Outside the Settlement Boundary, priority will be given to protecting and enhancing the countryside from inappropriate development and development will only be allowed in specified exceptional circumstances.



## HOUSING

### Objective

- 1 Ensure that the amount, size and tenure of new housing in Glemsford meets locally identified needs.
- 2 Enable opportunities for the provision of affordable housing that meets the needs of those with a connection to Glemsford.

The Neighbourhood Plan has an important role in identifying and delivering locally specific housing requirements for the village.

In the last 20 years Glemsford has had a 20% increase in the number of homes. Our 2018 Household Survey asked how many new homes should be built in the village over the next 20 years. The results indicate most support for between 51 and 100 additional homes. The Neighbourhood Plan proposes that around 100 new homes should be built between now and 2037, a slowing down of growth when compared with the last 20 years.

So that we can decide where new housing is developed, rather than Babergh force a site on us when they prepare their next Local Plan, the Neighbourhood Plan identifies a site south of Kings Road and west of Park Lane for 100 new homes and recreational open space.





Illustrative layout for how the site off Park Lane could be developed

The Neighbourhood Plan provides specific guidance as to how the site should be developed, including the illustrative layout, which will have to be taken into account when planning applications from developers are considered by Babergh Council. Development principles are included, covering phasing, movement and access, green infrastructure, and built form.

Specifically:

- the development would be phased with the second 50 homes not being developed until 2031,
- vehicle access would only be from Park Lane, where the 30mph speed limit would be extended,
- footpaths and cycle paths would link into the existing network,
- a minimum of 5 hectares of green space will be provided including play space and two futsal courts,
- the boundaries would be landscaped to minimise impact on neighbouring properties and the wider landscape,
- all buildings would be 2 storeys high and provide a range of house sizes, and
- 35% of the development would be affordable homes.

The Plan also makes provision for delivering affordable housing outside the Settlement Boundary, on what would be known as an "exception site", should:

- 1 - a local need has been established through a survey,
- 2 - the landowner is prepared to sell the land at significantly below housing market value, and
- 3 - a housing association is willing to work with the District and Parish Council to fund and manage the scheme.



## EMPLOYMENT

### Objectives

- 3 Maintain and improve employment opportunities that do not result in detrimental impacts on local infrastructure, the environment and residents' amenity
- 4 Improve opportunities for home working

Glemsford has always played a key role in providing jobs for the wider area, reflected by the nineteenth century horsehair, coconut fibre, flax and silk mills. It continues with the investment by GCB Cocoa on the former Philips Avent site.

The Neighbourhood Plan seeks to protect existing employment locations, including the GCB Cocoa site and equally important sites at Clockhouse Farm and Patches Yard south of Cavendish Road, supporting investment in the sites where such uses have satisfactory impacts.

It is envisaged that if employment proposals do come forward on new sites, they would remain small in terms of the size of the premises and the number of people employed on the site.

## NATURAL ENVIRONMENT

### Objectives

- 5 Protect and enhance the rural setting of the Parish and minimise the impact of development on the natural environment
- 6 Maximise opportunities to improve natural habitats and biodiversity

Development will be expected to have regard to the landscape character of the area and conserve or enhance it and its vicinity.

Trees, hedgerows and other natural features such as ponds and watercourses should be protected, as well as identified important views into and out of the built-up area of the village.

Proposals should integrate improvements to biodiversity levels through the creation of natural habitats, planting of native trees and hedgerows and the restoration and repair of wildlife networks, such as through the installation of bat and swift boxes.

Ten spaces have been identified as Local Green Spaces, meaning that development cannot take place on them unless in exceptional circumstances.

1. Amenity open space and play area at School Field
2. Tye Green
3. Fair Green
4. Parish Churchyard, cemetery and associated green spaces
5. Kings Road Play Area
6. Crownfield Road Play Area and open space
7. The Playing Field
8. Allotments
9. School Playing Field
10. Village Hall Play Area





## BUILT ENVIRONMENT

### Objectives

- 8 Recognise and protect the importance of Glemsford's historic assets and their settings.
- 9 Ensure that new development is designed in a way that reflects local character.
- 10 Minimise the impact of new development on infrastructure, services and existing residents.

Much of the village centre is covered by a conservation area and there are also 46 listed buildings in the parish. The design of new development can have a significant impact on its surroundings if not given careful consideration.

As part of the government-funded Neighbourhood Planning support package, Design Guidelines have been prepared for Glemsford, which proposals for new development should take into account.

New development will also need to meet a number of requirements relating to matters such as flood management, impact on existing residents, services and infrastructure, providing adequate parking and the protection of open areas.

Lighting schemes should not create light pollution while taking account of highway safety and security.





## SERVICES AND FACILITIES

### Objective

- 11 Protect and improve the range of community facilities and services.

Glemsford has a good range of services and facilities which meet most of the day-to-day requirements of residents, although it is fair to say that the Covid-19 pandemic has had a significant impact on the viability of many businesses with many no longer functioning.

The new Babergh Local Plan includes a policy for the protection of services and facilities and so it is not necessary to repeat such a policy in the Neighbourhood Plan.



## TRAVEL

### Objectives

- 12 Support and encourage safe and sustainable transport, including walking, cycling and public transport.  
13 Minimise the impact of vehicles on the environment.

Most matters relating to highways and travel do not require planning permission and there is little that planning policies can do about speed and volume.

However, a policy in the Neighbourhood Plan seeks to protect and improve the Parish's network of public rights of way.





## HOW TO COMMENT

The full version of the Plan will be available to download at <http://glemsford.onesuffolk.net/> from Friday 10 November, where an online comments form will also be available to complete.

If you don't have access to the internet, paper copies will be available to borrow for a short period from the Parish Council office Tuesday & Friday 9.30am-1.30pm or can be viewed at Glemsford Library, which is open Tuesday, Thursday and Friday 10.00-13.00 and 14.00-17.00 and Sunday 11.00-15.00

### Drop-in Event

We'll be at the Village Hall on Saturday 11 November between 12 noon and 5.00pm where you'll be able to find out more about the Plan and talk to members of the Parish Council and Working Group. Refreshments will be provided.

### How to comment

During the consultation period the Parish Council website will have an online survey form which you can complete paper free.

You can also collect a paper response form at the Drop-in Event or from the Parish Council office or Glemsford Library

You can submit your completed comments form by posting it in the Parish Council letterbox

**This is your chance to help shape the future of Glemsford. To make sure the Neighbourhood Plan reflects your views, please send in your comments - even if you support everything in the draft Plan.**

**COMMENTS MUST BE RECEIVED BY FRIDAY 5 JANUARY - WE CANNOT ACCEPT COMMENTS AFTER THIS TIME**



## Appendix 2 – November 2023 Drop-in Event Display

# Welcome



### The story so far:

- The Parish Council has been preparing a Neighbourhood Plan for the parish.
- We have now reached a major milestone and are commencing consultation on the Draft Plan.
- Consultation lasts until **Friday 5 January**, a period of 8 weeks.
- This exhibition provides a brief summary of the Plan, illustrating the planning policies and proposed community actions that are contained in the Plan.

## What is a Neighbourhood Plan?

It is a relatively new kind of planning document designed to allow local people to play an active part in planning for their area.

When complete, the Plan will form part of the statutory development plan for the area, meaning Babergh District Council and Planning Inspectors will have to take note of what it says when considering planning applications.



Over the next 7 weeks you have an opportunity to read the Plan and submit your comments.



**WE NEED YOUR VIEWS BY 5 JANUARY**

**Why not comment as you go round by accessing the comments form from your mobile phone using the QR code?**



# Plan Preparation Process



## How the Plan is prepared

There are several stages that must be completed, as illustrated. These stages are governed by the regulations for preparing neighbourhood plans and so there is no short cut.



# The Glemsford Plan

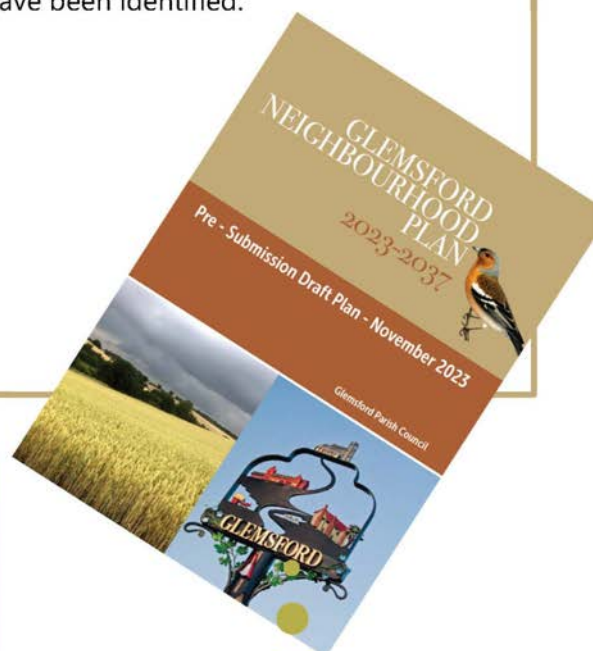


## Plan Contents

The Plan itself runs to 70 pages and is necessarily quite complex in places. This is because it will be used by Babergh District Council and Government Planning Inspectors to decide whether planning applications should be approved.

Based on the issues identified by you during the initial stages of preparing the Neighbourhood Plan, the following themes have been identified.

- Development Location
- Housing
- Employment
- Natural Environment
- Built Environment
- Services and Facilities
- Travel



## The Plan contains:

### Planning Policies

These will be used to supplement the Local Plan when decisions on planning applications are made.

Planning policies can only cover matters that would require planning permission, so they can't, for example, tackle speeding.

### Policies Maps

These illustrate areas of land or buildings where policies in the Plan apply.

Neighbourhood Plans cannot contradict the main government planning policies or the strategic policies in the Local Plan for the area.

For example, they cannot propose less development than is planned for in the adopted Local Plan.

# Vision and Objectives



## Neighbourhood Plan Vision

In 2037 Glemsford will be a place that has retained its village characteristics set in a high-quality landscape where services and facilities meet the day-to-day needs of residents and new development has protected and enhanced the historic and natural environment

## The Vision translates into the following Objectives that cover the six Plan themes

<b>Housing</b> 1 Ensure that the amount, size and tenure of new housing in Glemsford meets locally identified needs. 2 Enable opportunities for the provision of affordable housing that meets the needs of those with a connection to Glemsford.	<b>Employment</b> 3 Maintain and improve employment opportunities that do not result in detrimental impacts on local infrastructure, the environment and residents' amenity. 4 Improve opportunities for home working.	<b>Natural Environment</b> 5 Protect and enhance the rural setting of the Parish and minimise the impact of development on the natural environment. 6 Maximise opportunities to improve natural habitats and biodiversity.
<b>Built and Historic Environment</b> 8 Recognise and protect the importance of Glemsford's historic assets and their settings. 9 Ensure that new development is designed in a way that reflects local character. 10 Minimise the impact of new development on infrastructure, services and existing residents.	<b>Services and Facilities</b> 11 Protect and improve the range of community facilities and services.	<b>Travel</b> 12 Support and encourage safe and sustainable transport, including walking, cycling and public transport. 13 Minimise the impact of vehicles on the environment.

**DO YOU SUPPORT THE VISION AND OBJECTIVES?**



A detailed map of the village of Glemsay, showing the parish boundary as a thick black line. The map includes various landmarks and features:
 

- North:** Mind Farm, 185 House, Brook Close, Mulberry House, Works Cottage, Church, Park Farm, Park Lane.
- West:** Woodcock, Cleghouse Farm, Village Hall, Recreation Ground, Grafs Farm, The Studio.
- Central:** The Walnut Tree, Highview House, Mill House, Lodge Farm, Moor Vale.
- East:** A large red-shaded area with the text "See Policy GLEM 3".
- Other labels:** School, Old Oke, The Mill, Moor Vale, Park Lane.

 A north arrow is located in the top left corner. The map shows a dense network of roads and buildings within the parish boundary.

## A photograph of a traditional half-timbered house with a steep gable roof, surrounded by a green lawn and flowering trees. The house features dark wooden beams and a red-tiled roof. In the foreground, there is a well-manicured green lawn with a large, rounded yellow hedge and a small pond. A tree with light green blossoms is in the upper right, and a tree with red blossoms is in the middle ground. The sky is blue with white clouds.



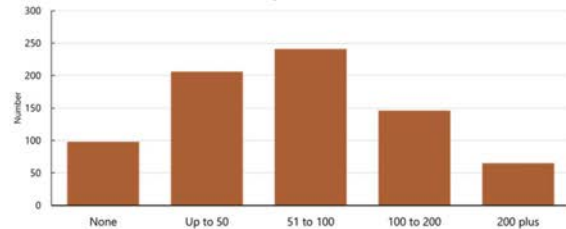
# Housing



## Context

- Preparing the Neighbourhood Plan provides scope for tailoring future housing provision to address locally specific issues.
- The 2021 Census notes a total of 1,625 dwellings in the parish, an increase of 276 over the period since 2001.
- The Neighbourhood Plan Village Survey asked how many new homes should be built in the village over the next 20 years. The results indicate most support for between 51 and 100 additional homes
- Glemsford is in a relatively sustainable location to accommodate limited growth, given its position adjoining the A1092 and with good access to the A134 leading to the towns of Bury St Edmunds and Sudbury.
- The village has a range of services and facilities, such as the GP surgery, shops and the primary school, which are available to meet the needs of its residents and of those in nearby villages such as Cavendish (in West Suffolk), Boxted, Hartest and Stanstead.
- Given the level of services in the village, there is some expectation that the village should have some housing growth over the next 15 years.
- The Neighbourhood Plan takes a positive approach towards the identification of both how much and where future housing development will take place in Glemsford.
- The alternative would be to let Babergh District Council dictate where and how much growth will take place, taking control away from us.

How many new homes do you think should be built in the village in the next twenty years?



## Policy GLEM2 – Housing Delivery

The Neighbourhood Plan provides for at least 100 dwellings to be developed in the Neighbourhood Plan area between 2023 and 2037.

This growth will be met through:

- the completion of new dwellings with planning permission as at 1 April 2023;
- the site allocation identified in Policy GLEM3; and
- small brownfield "windfall" sites and infill development within the Settlement Boundary.

In addition, proposals for the conversion of redundant or disused agricultural barns into dwellings outside the Settlement Boundary will be supported where:

- the building is structurally sound and capable of conversion without the need for extension, significant alteration or reconstruction; and
- the proposal is a high-quality design and the method of conversion retains the character and historic interest of the building; and
- the proposal would lead to an enhancement to the immediate setting of the building, and the creation of a residential curtilage and any associated domestic paraphernalia would not have a harmful effect on the character of the site or setting of the building, any wider group of buildings, or the surrounding area.



**DO YOU SUPPORT THIS POLICY?**



# Housing Site Consideration



- The Parish Council took an early decision in the preparation of the Neighbourhood Plan to allocate a site for housing.
- An independent assessment of potential sites for housing was prepared by AECOM consultants, paid by the Government's neighbourhood planning support programme.
- 11 sites were assessed for suitability and availability and, as a result, 7 were ruled out leaving 4 which were potentially suitable subject to constraints being overcome. The 4 sites are illustrated.



## Site 1: Land east of Duffs Hill

The site has an area of 1.29 hectares and a capacity of between 25 and 30 dwellings. It would be accessed off Duffs Hill, a single-track road and may not be able to support a significant amount of new vehicle movement arising from new development. There are listed buildings in close proximity to the site and development could have a detrimental impact on the setting of these heritage assets. The Glemsford Site Options and Assessment (2020) concluded that it would only be suitable for a limited amount of development.

## Site 2: Land west of Duffs Hill

The site has an area of 4.02 hectares but only the frontage was considered possibly suitable for housing when assessed both by Babergh District Council in their Strategic Housing and Employment Land Availability Assessment (2019). As with Site 1, the site would be accessed from Duffs Hill which would be unsuitable for significant increases in traffic. The Glemsford Site Options and Assessment (2020) concluded that it would only be suitable for a limited amount of development.



## Site 3: Lane west of Park Lane

The site has an area of 11.4 hectares and is centrally located close to existing services and facilities with only minor physical constraints. Park Lane is a two-way road with direct access to the A1092. Pedestrian links to the services and facilities of the village centre could be provided via The Pippins and via Drapery Common. The Glemsford Site Options and Assessment (2020) concluded that the site had the potential to create an urban extension that might also include additional physical, social and green infrastructure. Structural screening would need to be planted along the southern and eastern boundaries to reduce the visual impact on the surrounding countryside.

## Site 4: Land south-east of George Lane

The site has an area of 2.8 hectares and would have to be accessed via Flax Lane which is a narrow single-track road that would be unsuitable for significant increases in traffic. Pedestrian links to the services and facilities of the village centre could be provided via George Lane and via Long Pastures. Development on the site has the potential to impact on the nearby Conservation Area. Structural screening would need to be planted along the southern and eastern boundaries to reduce the visual impact on the surrounding countryside. The Glemsford Site Options and Assessment (2020) concluded that the site had some potential for development.

# Preferred Housing Site



- Having considered potential future housing needs and the availability of sites, the Neighbourhood Plan allocates a site of 11.4 hectares west of Park Lane for 100 new homes.
- Further detailed work on how the site could be developed has been taken through the preparation of a Site Masterplan report, also prepared by the AECOM consultancy as part of the Government's neighbourhood planning support programme.
- The Masterplan report assessed:
  - Location of existing community facilities
  - Proximity of heritage assets
  - Landscape and topography of the site and its setting
  - Movement and access
  - Site development constraints and opportunities



Site Concept

## Development Principles

The development of the site should be carried out in accordance with the following principles.

### Phasing

- In order to assimilate the development into the existing village and reduce singular impact on services, the development should be split into two phases of equal number of homes, with the first homes in the second phase not being commenced until January 2031.

### Movement and access

- The site should be accessed by road solely from Park Lane.
- The 30mph speed limit on Park Lane should be extended to the southern extent of the site.
- Pedestrian and cycle links should be provided to adjoining paths to encourage walking and cycling into village centre destinations such as shops and the Primary School.
- Means of ensuring a safe crossing of Park Lane should be provided to enable improved linkage into the public rights of way network.
- The majority of the parking should be located on plot, primarily to the side of the properties. There is scope for some component of on-street parking to accommodate visitors parking.

### Green Infrastructure

- A minimum five hectares of new green space will be provided as part of the overall development of the site.
- New amenity space, play space (for children and youth), and two multi-purpose futsal courts/ multi-use games areas should be available for village to enjoy.
- The new network of open spaces must seek to integrate existing features such as hedgerows and trees.
- The eastern and southern boundaries of the site, adjoining Park Lane and the open countryside, should comprise structured landscaping with new tree planting to screen the development from locations across the Glem valley to the east and Stour valley to the south.

### Built form (townscape)

- All the buildings will be of two storeys in height, allowing for the views towards the surrounding landscape to still be visible from the main village.
- Buildings should be arranged with their frontages perpendicular to the road line.
- Development should be arranged in a series of large and smaller parcels. Each parcel should have a relationship with the open space and surrounding street network in some shape or form.

### Policy GLEM3 - Land west of Park Lane

A site of 11.4 hectares west of Park Lane is allocated for 100 dwellings and recreational open space.

Development of the site should be undertaken in accordance with the Concept Diagram (Figure 1) and the Development Principles set out in this Plan.

Development proposals should:

- incorporate measures to manage traffic safety and speeds on Park Lane including a southerly extension of the 30 mph speed limit and safe crossing point at the public right of way as illustrated on the Concept Diagram
- enable access to the public rights of way network and other paths linking the site to adjoining development

Housing proposals should provide a mix of sizes and types in accordance with the most up-to-date evidence on objectively-assessed housing needs.

The affordable housing provision should be designed so that it is 'tenure blind' (so that it is indistinguishable from open market housing), be distributed around the site and not concentrated in any one area.

Proposals that include an element of self-build housing will be supported.

**DO YOU SUPPORT THE DEVELOPMENT PRINCIPLES, SITE CONCEPT AND POLICY?**



# Affordable Housing



## Affordable Housing

- National planning policy enables an alternative mechanism for meeting locally identified affordable housing needs through "rural exception sites" located outside but adjoining the Development Envelope where housing would not normally be permitted
- It does enable small affordable housing schemes to be built outside the Development Envelope for those with a proven local connection who cannot afford to buy.
- In order to deliver such a scheme, the following must apply:



### Policy GLEM4 – Affordable Housing on Rural exception Sites

Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 72 of the NPPF) on rural exception sites outside the Settlement Boundary, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:

- Remains affordable in perpetuity; and
- Is for people that are in housing need because they are unable to buy or rent properties in the Village at open-market prices; and
- Is offered, in the first instance, to people with a demonstrated local connection, as defined by the Babergh District Council Choice Based Lettings Scheme. Where there is no need, a property should then be offered to those with a demonstrated need for affordable housing in neighbouring villages.

These restrictions should be delivered through a legal agreement attached to the planning consent for the housing.

Applications for such development will be considered in relation to the appearance and character of the surrounding area, the potential impact on residential amenity and highway safety.

To be acceptable, proposals should demonstrate that a local need exists which cannot otherwise be met by applying normal planning policy for the provision of affordable homes in association with market housing.

Any application for affordable housing in respect of this policy should be accompanied by a detailed need assessment and the accommodation proposed should contribute to meeting this proven need.

In exceptional circumstances, a small number of market homes will be permitted where it can be demonstrated:

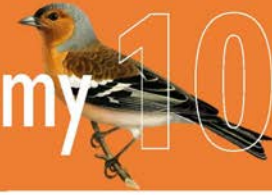
- That no other means of funding the construction of the affordable homes is available; and
- The market housing is subsidiary to the affordable housing element of the proposal and the amount of market housing required is, as demonstrated through a viability assessment, the minimum required to deliver the affordable housing.

Where sites for affordable housing in the countryside are brought forward with an element of market housing, both housing tenures should be built to the same design standards and contribute towards the character of the area.



**DO YOU SUPPORT THIS POLICY?**

# Employment and Local Economy



## Context

- Glemsford has always played a key role in providing jobs for the wider area, reflected by the nineteenth century horsehair, coconut fibre, flax and silk mills. It continues with the investment by GCB Cocoa on the former Philips Avent site.
- The Neighbourhood Plan seeks to protect existing employment locations, including the GCB Cocoa site and equally important sites at Clockhouse Farm and Patches Yard south of Cavendish Road, supporting investment in the sites where such uses have satisfactory impacts.
- It is envisaged that if employment proposals do come forward on new sites, they would remain small in terms of the size of the premises and the number of people employed on the site.

## Policy GLEM 6 - New Businesses and Employment Development

Proposals for new business development will be supported where sites are located within the Settlement Boundaries identified on the Policies Map where they would not have an unacceptable impact on residential amenity, heritage assets and the highways network.

Outside the Settlement Boundaries, proposals will be supported where:

- it is located on land designated in the development plan for business use; or
- it relates to small scale leisure or tourism activities or other forms of commercial / employment related development or agriculture related development of a scale and nature appropriate to a countryside location.

Where possible, business developments should be sited in existing buildings or on areas of previously developed land and be of a size and scale that does not adversely affect the character, highways, infrastructure, residential amenity, environment (including national and international designated sites) and landscape character as identified in the Neighbourhood Plan Landscape Appraisal.

## Policy GLEM 5 – Employment Sites

The retention and development of existing employment and other business uses, including those identified on the Policies Map, will be supported providing such proposals do not have a detrimental impact on the local landscape character, heritage assets, residential (including noise, light and air pollution, loss of privacy and overlooking), traffic generation, identified important views and identified important gaps in the built-up area.

Proposals for non-employment or business uses that are expected to have an adverse impact on employment generation will only be permitted where one or more of the following criteria has been met:

- evidence can be provided that genuine attempts have been made to sell/let the site/premises in its current use, and that it can be demonstrated that no suitable and viable alternative employment / business uses can be found or are likely to be found in the foreseeable future;
- the existing use has created over-riding environmental problems (e.g. noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment / business site;
- an alternative use or mix of uses would assist in regeneration and offer greater benefits to the community in meeting local business and employment needs;
- it is for an employment related support facility, such as employment training/education or workplace crèche;
- an alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment / business site.



**DO YOU SUPPORT THESE POLICIES?**



# Natural Environment



## Landscape

- Within the parish there are two Sites of Special Scientific Interest:
  - Glemsford Pits, which are disused water-filled gravel workings that include a length of the River Stour and which extend across the county border into Essex; and
  - Court Wood which is ancient woodland and one of a group of 15 woods associated with the former Kentwell Estate.
- The Neighbourhood Plan draws upon two studies prepared by Babergh District Council. The Heritage and Settlement Sensitivity Assessment and the Valued Landscape Assessment.
- A separate Landscape Character Appraisal has been prepared as part of the Neighbourhood Plan preparation. It identified five distinct landscape character areas around the village.

## Policy GLEM7 - Protection of Landscape Setting of Glemsford

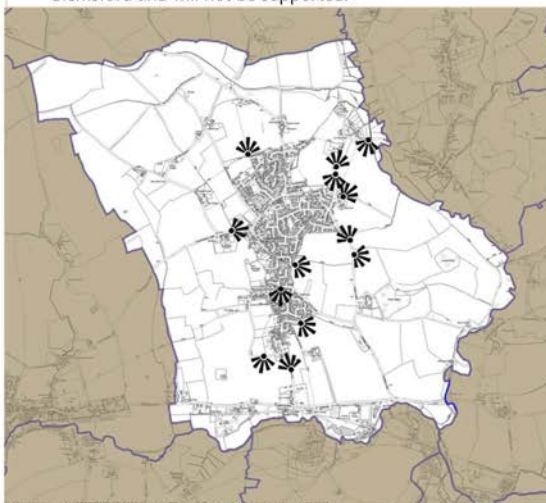
To conserve the essential landscape, heritage and rural character of the Neighbourhood Plan Area, development proposals shall, where appropriate, demonstrate how they:

- have regard to the rural and landscape character and the setting of the built-up areas of the parish; and
- conserve or enhance the unique landscape and scenic beauty within the parish, having regard to the Glemsford Landscape Character Appraisal.

Proposals for new buildings outside the Settlement Boundary will be required to be accompanied by a Landscape Visual Impact Appraisal or other appropriate and proportionate evidence that demonstrates how the proposal can be accommodated in the countryside without having a detrimental impact, by reason of the buildings scale, materials and location, on the character and appearance of the countryside and its distinction from the built-up area.

## Important Views

- The Landscape Character Appraisal identified important views into and out of the village from public locations. These supplement those identified in the Stour Valley Project Area Valued Landscape Assessment and all are illustrated on the map.
- Inconsiderate development could have a significant and unwanted detrimental impact on the landscape setting of Glemsford and will not be supported.



## Policy GLEM 8 - Protection of Important Views

Important views from public vantage points either within the built-up area or into or out of the surrounding countryside are identified on the Policies Map. Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Views.



**DO YOU SUPPORT THESE POLICIES?**

# Natural Environment



## **Biodiversity**

- Maintaining and improving wildlife habitats and features is essential to the natural environment.
- In the coming months, national legislation will require development to include provision for a "net-gain" in biodiversity.
- The Neighbourhood Plan sets out how this should be achieved.



## **Policy GLEM 9 - Biodiversity**

Development proposals should avoid the loss of, or material harm to trees, hedgerows and other natural features such as ponds.

Where such losses or harm are unavoidable, adequate mitigation measures or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused.

Where new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.

Otherwise acceptable development proposals will be supported where they provide a net gain in biodiversity through, for example:

- a. The creation of new natural habitats including ponds;
- b. The planting of additional native trees and hedgerows of local provenance and;
- c. Restoring and repairing fragmented biodiversity networks through, for example, including swift-boxes, bat boxes and holes in fences which allow access for hedgehogs.



## **Local Green Spaces**

- National planning policy enables the designation and protection of land of particular importance to local communities as Local Green Spaces ('LGS') in neighbourhood plans.
- Such designations rule out new development other than in very special circumstances.



## **Policy GLEM 10 – Local Green Spaces**

The following Local Green Spaces are designated in this Plan and identified on the Policies Map:

1. Amenity open space and play area at School Field
2. Tye Green
3. Fair Green
4. Parish Churchyard, cemetery and associated green spaces
5. Kings Road Play Area
6. Crownfield Road Play Area and open space
7. The Playing Field
8. Allotments
9. School Playing Field
10. Village Hall Play Area

Development in the Local Green Spaces will be consistent with national policy for Green Belts.

**DO YOU SUPPORT THESE POLICIES?**



# Built Environment and Design



## Context

- As part of the Government's neighbourhood planning support programme, Design Guidance and Codes for the Parish have been prepared.
- It provides guidance that seeks to inform the design of new development in order to retain and protect the character and distinctiveness of Glemsford.
- New development in Glemsford should achieve a high-quality design that enhances the unique characteristics of the village and ensures a better quality of life for residents.

## Flooding

- We know from recent experience that flooding from rivers and after heavy rainfall can be a problem in some areas.
- Proposals will be required, where appropriate, to make provision for the management of surface water run-off.
- The use of Sustainable Drainage Systems (SuDS) will be necessary on larger developments and supported on smaller schemes
- The new Local Plan includes Policy LP27 – 'Flood risk and vulnerability' and it is not necessary to repeat the requirements of that policy in the Neighbourhood Plan.

## Light Pollution

- It is acknowledged that the lighting of development, while increasing a sense of security, can also impact upon residential amenity, the character and appearance of an area (particularly rural locations) and the environment.

## Policy GLEM 12 – Artificial Lighting

Dark skies are to be preferred over lighting while ensuring that new developments are secure in terms of occupier and vehicle safety. Any future outdoor lighting systems should have a minimum impact on the environment, minimising light pollution and adverse effects on wildlife, subject to highway safety, the needs of particular individuals or groups, and security. Schemes should make use of low-level downward facing lighting and reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare and light pollution.

## Policy GLEM 11 – Development Design

Proposals for new development must reflect the local characteristics and circumstances in the Neighbourhood Plan Area as described in the Glemsford Design Guidance and Code and create and contribute to a high quality, safe and sustainable environment.

Planning applications should demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix 3 of the Neighbourhood Plan, as appropriate to the proposal.

In addition, proposals will be supported where they:

- recognise and address the key architectural features, characteristics, landscape/building character, local distinctiveness and special qualities of the area and, where necessary, prepare a landscape character appraisal to demonstrate this;
- maintain the village's sense of place and/or local character, as identified in the Glemsford Design Guidance and Code;
- do not involve the loss of gardens, important open, green or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;
- taking mitigation measures into account, do not affect adversely and, where appropriate enhance:
  - any historic, architectural or archaeological heritage assets of the site and its surroundings;
  - important landscape characteristics including trees and ancient hedgerows and other prominent topographical features;
  - identified important views into, out of, or within the village as identified on the Policies Map;
  - sites, habitats, species and features with biodiversity and ecological interest;
  - the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated; and/or residential amenity;
- do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;
- produce designs that respect the character, scale and density of the locality;
- include tree-lined streets unless in specific cases there are clear, justifiable and compelling reasons why this would be inappropriate, and include trees elsewhere within developments where the opportunity arises.
- produce designs, in accordance with adopted standards, that maintain or enhance the safety of the highway network, ensuring that all vehicle parking is provided within the plot and that spaces and garages meet the adopted minimum size standards;
- seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement;
- wherever possible ensure that development faces on to existing roads;
- where appropriate, make adequate provision for the covered storage of all wheelie bins and cycle storage in accordance with adopted cycle parking standards;
- include suitable ducting capable of accepting fibre to enable superfast broadband; and
- provide one electric vehicle charging point per new off-street residential parking place created.

**DO YOU SUPPORT THESE POLICIES?**



# Services and Facilities



## Context

- Glemsford has a good range of services and facilities which meet most of the day-to-day requirements of residents
- the Covid-19 pandemic followed by the UK economic downturn has had a significant impact on the viability of many businesses, with many no longer functioning.
- Policy LP28 of Part 1 of the Joint Local Plan would apply to:
  - i. proposals for new and or expanded facilities, or
  - ii. development that would result in the loss of existing facilities
- It is therefore not necessary to have a specific policy in the Neighbourhood Plan to protect existing facilities or which would apply to proposals for new facilities and services.



# Travel

## Context

- Because most road improvements can take place within the highway, they do not require planning permission and, as such, the neighbourhood plan is limited in what it can deliver.
- Likewise, the provision of bus services is a decision made outside the planning system.
- Although the Parish Council cannot deliver highway improvements, it does have a lobbying role in delivering such measures.

## Public Rights of Way

- Public rights of way provide opportunities for recreational walking and, where permitted, horse riding and cycling.
- Where feasible, improvements to the quality and extent of the public rights of way network will be supported where provided as part of development proposals.

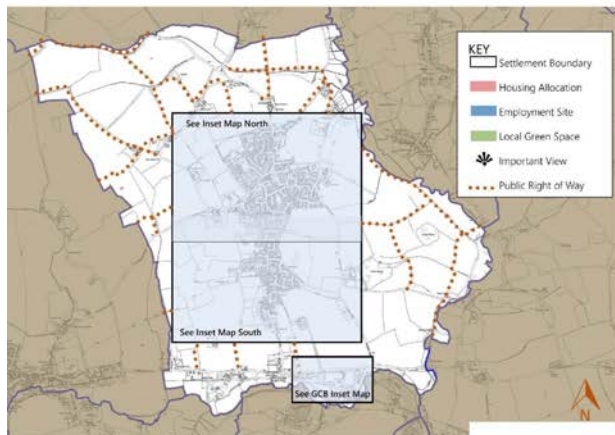
## Policy GLEM 13 - Public Rights of Way

Measures to improve and extend the existing network of public rights of way and bridleways will be supported where their value as biodiversity corridors is safeguarded and any public right of way extension is fit for purpose. Where practicable development proposals should incorporate measures to enhance biodiversity within the improved or extended public right of way.

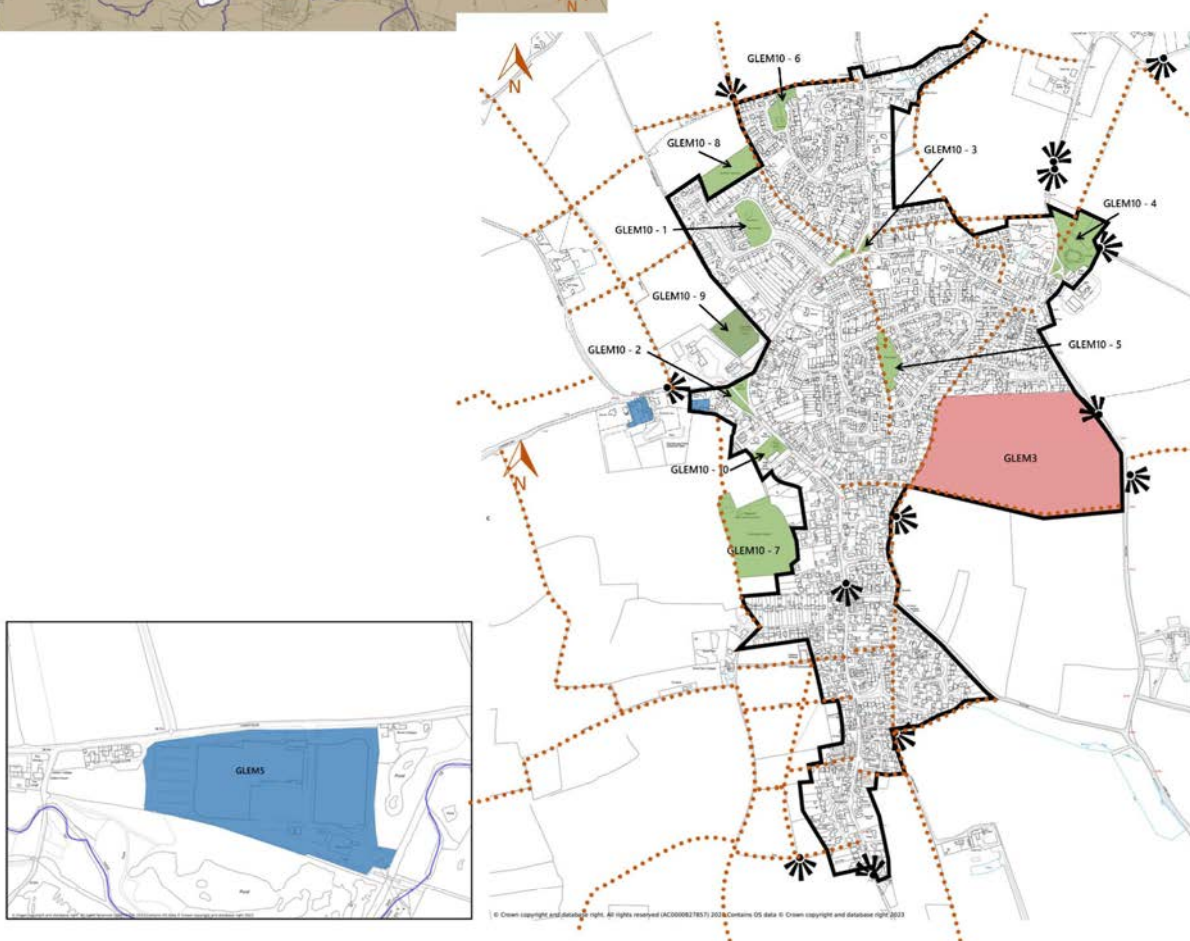


**DO YOU SUPPORT THIS POLICY?**

# Policies Maps



*The Policies Maps illustrate designations that are made in the planning policies of the Neighbourhood Plan*



**DO YOU SUPPORT THE CONTENT OF THE POLICIES MAPS?**

# What next.....



## **Consultation on the Neighbourhood Plan ends on 5 January**

At the end of the consultation the Working Group will review all submitted comments before deciding if any amendments to the Plan are required.

At the same time a "Consultation Statement" and a document known as the "Basic Conditions Statement" will be prepared. The Final Draft Plan – known as the "Submission Plan" and the above documents will be put to the Parish Council for approval for submission to Babergh District Council.

## **Further Consultation**

Babergh District Council will carry out a further six-week consultation on the Neighbourhood Plan before it is submitted to an Independent Examiner.

## **Examination**

The Independent Examiner will review the Plan and consider any objections to it.

The Examiner's Report will recommend whether the Plan, possibly with amendments, should proceed to a referendum in the parish.



## **Referendum**

If the Examiner recommends that a Referendum on the Plan should take place, this will be organised and paid for by Babergh District Council in the same way as a local election. Notice will be given of the Referendum and all those living in the parish that are entitled to vote will be asked whether the Neighbourhood Plan should be approved. No matter how many turn out to vote, if more votes say "Yes" then the Neighbourhood Plan will be adopted.

You can submit your comments on the Draft Neighbourhood Plan online at the Parish Council website or, if you don't have the internet, by completing a comments form and returning it to the post box at the Village Hall.

**Why not complete a form today?**



## Appendix 3 – Statutory Consultees Notified of Regulation 14 Consultation

Position	Body
MP for South Suffolk	
MP for Braintree	
County Cllr to Melford Division	Suffolk County Council
County Cllr to Clare Division	Suffolk County Council
County Councillor to Hedingham Division	Essex County Council
Ward Cllrs to Chadacre	Babergh District Council
Ward Cllrs to Clare, Hundon and Kedington	West Suffolk Council
Ward Cllr to Stour Valley North	Braintree District Council
Ward Cllrs to Long Melford	Babergh District Council
Chairman	Boxted Parish Meeting
Parish Clerk	Cavendish Parish Council
Parish Clerk	Pentlow Parish Council
Parish Clerk	Foxearth & Liston Parish Council
Parish Clerk	Long Melford Parish Council
Chairman	Stanstead Parish Council
Planning Policy Team	West Suffolk Council
Planning Policy	Braintree District Council
Strategic Planning	Babergh & Mid Suffolk District Councils
SCC Neighbourhood Planning	Suffolk County Council
Land Use Operations	Natural England
Essex, Norfolk & Suffolk Sustainable Places Team	Environment Agency
East of England Office	Historic England
East of England Office	National Trust
Town Planning Team	Network Rail Infrastructure Limited
	Highways England
Stakeholders & Networks Officer	Marine Management Organisation
	Vodafone and O2 - EMF Enquiries
	Three
Estates Planning Support Officer	Ipswich & East Suffolk CCG & West Suffolk CCG
Avison Young (obo National Gas Transmission)	National Gas Transmission
Avison Young (obo National Grid)	National Grid
Stakeholder Engagement Team	UK Power Networks
Spatial Planning Advisor	Anglian Water
Planning Liaison Team	Essex & Suffolk Water
DIO Assistant Safeguarding Manager	Defence Infrastructure Organisation
	National Federation of Gypsy Liaison Groups
Head of Equality, Diversity and Inclusion	Communities & Environmental Services
	Diocese of St Edmundsbury & Ipswich
Chief Executive	Suffolk Chamber of Commerce
Strategy Manager	Freeport East
	RSPB
Senior Planning Manager	Sport England (East)
	Suffolk Constabulary
	Suffolk Wildlife Trust
Director	Suffolk Preservation Society
	Community Action Suffolk
Community Engagement Officer	Rural Community Council for Essex

Position	Body
National Landscape Enhancement Officer	Dedham Vale Society
	Dedham Vale National Landscape & Stour Valley
	Suffolk Coast & Heath National Landscape
	The Theatres Trust
Director	East Suffolk Internal Drainage Board
	Lawson Planning Partnership Ltd
	James Bailey Planning Ltd

## Appendix 4 – Statutory Consultee Consultation Notice

### **GLEMSFORD (SUFFOLK) NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION (REGULATION 14)**

Dear Sir/Madam

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended), Glemsford Parish Council is undertaking a Pre-Submission Consultation on the Draft Neighbourhood Plan for the Parish. Babergh District Council has provided your details as a body/individual we are required to consult and your views on the Draft Neighbourhood Plan would be welcomed.



The full plan and supporting documents can be viewed [here](#) together with information on how to send us your comments.




This Pre-Submission Consultation runs until Friday 5 January 2024.




We look forward to receiving your comments. If possible, please submit them online at <https://www.smartsurvey.co.uk/s/GlemsfordNP/> or, if that is not possible, please send them in a reply to this email.



Clerk  
Glemsford Parish Council




## Appendix 5 – Summary of Responses to Consultation Questions

1. Do you have any comments on Chapters 1, 2 and 3?				
Answer Choices			Response Percent	Response Total
1	Yes		36.84%	7
2	No		63.16%	12

2. Do you support the Vision and Objectives in Chapter 4?				
Answer Choices			Response Percent	Response Total
1	Yes		45.00%	9
2	No		40.00%	8
3	No opinion		15.00%	3

3. Do you support Policy GLEM 1 - Spatial Strategy?				
Answer Choices			Response Percent	Response Total
1	Yes		36.84%	7
2	No		36.84%	7
3	No opinion		26.32%	5



4. Do you have any other comments on Chapter 5 - Planning Strategy?				
Answer Choices			Response Percent	Response Total
1	Yes		40.00%	8
2	No		60.00%	12

5. Do you support Policy GLEM 2 – Housing Delivery?				
Answer Choices			Response Percent	Response Total
1	Yes		50.00%	10
2	No		40.00%	8
3	No opinion		10.00%	2



6. Do you have any comments on Figure 1 - Site Development Concept?				
Answer Choices			Response Percent	Response Total
1	Yes		65.00%	13
2	No		35.00%	7






### 7. Do you have any comments on the Development Principles in paragraph 6.22?

Answer Choices			Response Percent	Response Total
1	Yes		40.00%	8
2	No		60.00%	12



### 8. Do you support Policy GLEM 3 - Land west of Park Lane?

Answer Choices			Response Percent	Response Total
1	Yes		55.00%	11
2	No		45.00%	9
3	No opinion		0.00%	0




### 9. Do you support Policy GLEM4 – Affordable Housing on Rural Exception Sites?

Answer Choices			Response Percent	Response Total
1	Yes		45.00%	9
2	No		40.00%	8
3	No opinion		15.00%	3




### 10. Do you have any other comments on Chapter 6 - Housing?

Answer Choices			Response Percent	Response Total
1	Yes		50.00%	10
2	No		50.00%	10



### 11. Do you support Policy GLEM5 - Employment Sites?

Answer Choices			Response Percent	Response Total
1	Yes		60.00%	12
2	No		20.00%	4
3	No opinion		20.00%	4




### 12. Do you support Policy GLEM 6 - New Businesses and Employment?

Answer Choices			Response Percent	Response Total
1	Yes		55.00%	11
2	No		30.00%	6
3	No opinion		15.00%	3




### 13. Do you have any other comments on Chapter 8 - Employment?

Answer Choices			Response Percent	Response Total
1	Yes		30.00%	6
2	No		70.00%	14




### 14. Do you support Policy GLEM7 - Protection of Landscape Setting of Glemsford?

Answer Choices			Response Percent	Response Total
1	Yes		65.00%	13
2	No		30.00%	6
3	No opinion		5.00%	1




### 15. Do you support Policy GLEM8 - Protection of Important Views?

Answer Choices			Response Percent	Response Total
1	Yes		70.00%	14
2	No		20.00%	4
3	No opinion		10.00%	2



### 16. Do you support Policy GLEM9 - Biodiversity?

Answer Choices			Response Percent	Response Total
1	Yes		75.00%	15
2	No		10.00%	2
3	No opinion		15.00%	3




### 17. Do you support Policy GLEM10 – Local Green Spaces?

Answer Choices			Response Percent	Response Total
1	Yes		65.00%	13
2	No		15.00%	3
3	No opinion		20.00%	4




### 18. Do you have any further comments on Chapter 9 - Natural Environment?

Answer Choices			Response Percent	Response Total
1	Yes		25.00%	5
2	No		75.00%	15



### 19. Do you support Policy GLEM11 – Development Design?

Answer Choices			Response Percent	Response Total
1	Yes		50.00%	10
2	No		35.00%	7
3	No opinion		15.00%	3



### 20. Do you support Policy GLEM12 – Artificial Lighting?

Answer Choices			Response Percent	Response Total
1	Yes		57.89%	11
2	No		26.32%	5
3	No opinion		15.79%	3




### 21. Do you have any further comments on Chapter 10 - Built and Historic Environment?

Answer Choices			Response Percent	Response Total
1	Yes		10.00%	2
2	No		90.00%	18



### 22. Do you have any further comments on Chapter 11 - Services and Facilities?

Answer Choices			Response Percent	Response Total
1	Yes		20.00%	4
2	No		80.00%	16

### 23. Do you support Policy GLEM13 – Public Rights of Way?




Answer Choices			Response Percent	Response Total
1	Yes		75.00%	15
2	No		15.00%	3
3	No opinion		10.00%	2

### 24. Do you have any further comments on Chapter 12 - Travel?



Answer Choices			Response Percent	Response Total
1	Yes		15.00%	3
2	No		85.00%	17





### 25. Do you support the content of the Policies Map and Inset Maps?

Answer Choices			Response Percent	Response Total
1	Yes		50.00%	10
2	No		35.00%	7
3	No opinion		15.00%	3




### 26. Do you have any comments on the Appendices?

Answer Choices			Response Percent	Response Total
1	Yes		10.00%	2
2	No		90.00%	18

### 27. Do you have any other comments on the Draft Neighbourhood Plan?

Answer Choices			Response Percent	Response Total
1	Yes		20.00%	4
2	No		80.00%	16

### 28. Ultimately, the Plan will be subject to a Parish Referendum when residents will be asked whether they want Babergh District Council to use the Neighbourhood Plan to help it decide planning applications. Overall, would you vote in favour of the Neighbourhood Plan at a Parish Referendum?

Answer Choices			Response Percent	Response Total
1	Yes		50.00%	10
2	No		40.00%	8
3	Unsure		10.00%	2

## Appendix 6 - Responses received to Pre-Submission Consultation, Responses to Comments and Proposed Changes

The tables in this appendix set out the comments that were received during the Pre-Submission Consultation Stage and the responses and changes made to the Plan as a result of the comments. The first table is laid out in Plan order with the general comments following the comments on the policies. Where proposed changes to the Plan are identified, they relate to the Pre-Submission Draft Plan. Due to deletions and additions to the Plan, they may not correlate to the paragraph or policy numbers in the Submission version of the Plan.

Name	Organisation	Comment
<b>Chapters 1, 2 and 3 comments</b>		
R Newman		Item ii How do you intend to prove this point Item iii How would it effect the outlook for people living next to development
M Crowley		Chapter 1 - I refer to the 2017 comments from local residents. These will need to be reviewed as part of the Joint Local Plan Part 2 which will be reviewed by Babergh at the beginning of January 2024 as the Inspector has asked for more work before the plan is adopted. There will of course be another round of consultations. The Call for Sites will be considered after landowners and developers have put forward land allocations for development. Development land for housing is worth a lot more to the local farmers than land for agricultural use. Chapter 2 - I was interested to see the 2021 Census and the population profile of the Village. Chapter 3 - Planning Policy NPPF and Strategic Babergh Policies September 2023 and the revised NPPF and timeframe. Part 1 goes to Babergh's full Council in November 2023.
N Vyse		Not sure that the infrastructure of the village can cope with this many extra dwellings. Investment in the village should come before and as a prerequisite of any development.
L Crofton		I hope I have completely misunderstood this but is it the case that all the hard work, time, and money spent on this Neighbourhood Plan can be overridden by the clause in the introduction 1.7 that reads "Occasionally the NPPF is updated and, in such circumstances, those changes will supersede the policies in the Neighbourhood Plan"?

Name	Organisation	Comment
A Good		Thank you for undertaking the task !
L Pearce		Glemsford sits in a rural area not an urban one and needs to be preserved, Building more houses in Glemsford contradicts the environmental and climate rhetoric as the nearest realistic job prospects are as far as Bury st Edmunds, Ipswich and Colchester and beyond due to the fact that most of the industry in the local area has now disappeared and lack of suitable public transport means more cars in the village.
C Mills	Savills UK Ltd on behalf of Rainier Developments	Paragraphs 3.2-3.4: It is noted that this consultation document was published prior to the latest version of the NPPF, which was released in December 2023. Whilst we expect the Parish Council and their advisors are aware of this update (indeed an awareness is acknowledged in paragraph 3.4), we highlight the recent publication as a matter of courtesy.
	Suffolk County Council	<p>SCC supports Section 2 historic background for Glemsford. This could be enhanced by a search of the Suffolk Historic Environment Record (HER). The inclusion of an HER search in map format within this chapter would be a useful addition to show all heritage assets (above and below ground).</p> <p>SCC welcomes the mention of the Suffolk Minerals and Waste Local Plan 2020 in paragraph 3.6.</p> <p><b>Safeguarded Sites</b>  For information, there is one safeguarded site within the parish boundary and one further site to the south-east of the parish boundary (AW121 – Sewage Treatment Works). The safeguarded site is outlined in the table below:  AW71 Anglian Water Facility Glemsford Sewage Treatment Works</p> <p>In the case of AW71, Policy WP18 (Safeguarding of Waste Management Sites) of the Suffolk Minerals and Waste Local Plan 2020 will apply, a note in the plan stating this would provide clarity.</p> <p>The majority of Glemsford parish boundary sits within the minerals safeguarding area as defined by Policy MP10 (Minerals Consultation and Safeguarding Areas) and as outlined on the Safeguarding and Proposals Map.<sup>6</sup> This area can also be viewed on the Interactive Map of Waste Locations of Interest<sup>7</sup> by enabling the “consultation area” overlay (this can be activated via the tab in the lower right corner). The above-mentioned site can also be viewed on this interactive map.</p>



Name	Organisation	Comment
		<p>Therefore, paragraph 3.6 of the neighbourhood plan needs to be updated for accuracy, as whilst there are no minerals safeguarded sites, there is a safeguarded waste site within the parish boundary.</p>
	<p>Babergh District Council</p>	<p>As predicted in para 3.5, Part 1 of the 'Babergh and Mid Suffolk <u>Joint</u> Local Plan' was adopted on the 21 November 2023. A small amendment to the first sentence can address this.</p> <p>Other JLP related amendments are mentioned below under your chapter headings.</p> <p><b>Chapter 1 – Introduction</b>  We have no substantive comments to make on this chapter but, under para 1.10, please note the following:</p> <ul style="list-style-type: none"> <li>We suggest that you refer to the Glemsford Landscape Character Appraisal (LCA) by its full title. This is also a '2019 draft' document and, consequently, much of the policy context information is out-dated.  <b>Question:</b> Will you be updating the LCA prior to submission with the NP?</li> <li>Reference is also made to a separate 'Appraisal of Important Views' document. The only 'views' document published on the Parish Council website at this time is Appendix A to the LCA. It is unclear if these are the same. [See also our comments below under the Chapter 9 sub-heading].</li> </ul> <p><b>Chapter 2 – About Glemsford</b>  We have no comments to make on this chapter.</p> <p><b>Chapter 3 – Planning Policy Context</b>  See above re para 3.5.</p>
<p><b>Parish Council response</b></p> <ul style="list-style-type: none"> <li>Chapter 3 will be updated to reflect the current position with national and local planning policies</li> <li>In any planning policy situation, they never stay in situ forever and are frequently updated. In the case of the NP, it will be necessary to monitor its effectiveness and potentially update it to be in general conformity with national and local planning policy.</li> </ul>		

Name	Organisation	Comment
		<ul style="list-style-type: none"> <li>• The Plan takes a balanced approach to minimising impact on the historic and natural environment and providing homes to meet the current and projected future housing needs of the area.</li> <li>• The inclusion of the Suffolk Historic Environment Record map is not considered necessary given that it is frequently updated leaving the NP providing false information.</li> <li>• Paragraph 3.6 will be updated to reflect the Minerals Safeguarding Area</li> <li>• The Landscape Character Appraisal will be updated to reflect current planning policy</li> <li>• The Plan will be amended to refer to the Landscape Character Appraisal appendix rather than the Appraisal of Important Views</li> </ul>
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>• Update chapter 3 to bring it up-to-date in relation to national and local plan policies</li> <li>• Amend paragraph 3.6 to reflect the presence of a Minerals Safeguarding Area</li> <li>• Amend references in Plan to Landscape Character Appraisal appendix rather than the Appraisal of Views</li> </ul>		
<b>Vision and Objectives comments</b>		
Anonymous		<p>I do not agree that this is going to protect the natural environment points 5 &amp; 6 need to be the focus of the village, there is already to many houses, cars and people in the village anymore would just increase traffic, and population that this village cannot sustain. point 12 &amp; 13 are wrong, there are already to many vehicle's in the village as it is as the bus service is poor and only goes to Bury people who work in any other place need a car due to where the village is situated so trying to promote and support cycling and walking is not realistic. each household now has an average of 2-3 cars so this traffic issue will only increase with a new housing estate.</p>
Anonymous		<p>I do not agree that this is going to protect the natural environment points 5 &amp; 6 need to be the focus of the village, there is already to many houses, cars and people in the village anymore would just increase traffic, and population that this village cannot sustain. point 12 &amp; 13 are wrong, there are already to many vehicle's in the village as it is as the bus service is poor and only goes to Bury people who work in any other place need a car due to where the village is situated so trying to promote and support cycling and walking is not realistic. each household now has an average of 2-3 cars so this traffic issue will only increase with a new housing estate.</p>

Name	Organisation	Comment
M Crowley		<p>NPPF tightens the rules about building homes in the countryside (on agricultural land), including the removal on the phase "truly innovative" as one of the circumstances that can be acceptable.</p> <p>Employment Objectives - Glemsford has few opportunities in the Village. Car journeys are required primarily due to the distances involved.</p> <p>Natural Environment Objectives - The housing development (land south of Kings Road, west of Park Lane) would create a sprawling scene. It would affect the visual and residential amenity by protruding its way into the countryside.</p> <p>It does not maintain the Local Landscape Designation.</p> <p>The JLP takes into account reversing the natural decline of farmland birds. B101 - Biodiversity Criteria. The area should be protected to enhance the features of the geological value in this rural area.</p> <p>The JLP gives the opportunity to contribute to air quality.</p> <p>Historic England has objected previously to this site as the site allocation proposed could result in adverse impacts upon the historic village.</p> <p>Services and Facilities - Policy CS6 - Services and Infrastructure is relevant.</p> <p>Travel - Hobbs Lane is not fit for purpose now. Additional housing will make this even more dangerous. It is called "Lane" for a reason, i.e. it is a country lane. Car journeys are the primary source of transport.</p> <p>Walking and cycling are rare as they are too dangerous and public transport is not well served.</p>
L Crofton		<p>However the statement 4.1 In 2037 Glemsford will be a place that has retained its village characteristics set in a high-quality landscape where services and facilities meet the day to-day needs of residents and new development has protected and enhanced the historic and natural environment.</p> <p>This statement feels incredible and completely contradictory to the opinion of the majority of residents as evidenced in the village survey 10.3.</p>
A Good		<p>In objective 9 I would like to see after new development the words "and infill" added. Glemsford's character and street scape has been injured by inappropriate infill with very poor design in many cases. As development rights have been removed, it is remarkable that BDC planners have passed delegated applications which are of poor design. It wouldn't happen in Long Melford !!!!! They need reminding that the conservation area in Glemsford requires a degree of special care. No mention of sustainable development. This should be included.</p>



Name	Organisation	Comment
L Pearce		Building more houses contradicts most of the statements in this chapter,
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	<p>Bloor Homes have an option on land west of Duffs Hill and as set out in the Babergh Local Plan Part 1 Consultation response are committed to supporting Glemsford in ensuring it can meet its locally identified housing needs (Objective 1). Furthermore, Bloor Homes recognise that through sensitive development, there are opportunities to maximise and improve natural habitats and biodiversity (Objective 6) to deliver sustainable development while retaining the important village character and high-quality landscape area.</p> <p>Bloor Homes also support opportunities for new development to reflect local character (Objective 9) while improving opportunities for home working (Objective 4) including via improvements to the range of community facilities and services (Objective 11).</p> <p>Bloor Homes are committed to working with the Parish Council to achieve these objectives.</p>
C Mills	Savills UK Ltd on behalf of Rainier Developments	<p>Objective 1: It is commendable that the Parish Council has acknowledged the importance and role that additional, proportionate housing growth can have on a village and the fact that it is important for communities to meet local needs, including affordable housing. It is suggested that greater clarification could be provided for residents within the Neighbourhood Plan, such as explaining the role and benefits housing growth plays in supporting existing local services, new homes bonus, additional receipts from Council taxes, additional disposable income to be invested by residents in the local area, which then generates additional jobs and wider social and economic investment in local clubs, societies and community schemes. Furthermore, that receipts secured through the s.106 process can provide significant investment to broader facilities such as health, schools and highways where need is identified so as to mitigate the impact of development.</p>
	Suffolk County Council	<p>SCC further welcomes that protection and enhancement of the historic environment features in the neighbourhood plan's vision for Glemsford in section 4.1</p> <p><i>Vision and Objectives</i> SCC welcomes the Vision statement, as well as Objectives 5 and 6 which focus on the Natural Environment.</p>

Name	Organisation	Comment
		<p>SCC welcome objectives 12 and 13 regarding sustainable transport and active travel.</p> <p>SCC supports objectives 12 and 13, focusing on travel. SCC Transport Strategy will seek to procure sustainable travel improvements from development wherever possible.</p>
	Babergh District Council	We have no comments to make on this chapter.
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>The Plan has to take a balanced approach between contributing towards the delivery of much needed housing and ensuring that the most important elements of the natural and historic environment are protected and that services and infrastructure have or are capable of having sufficient capacity</li> <li>Historic England has not objected to the allocation in the Neighbourhood Plan</li> <li>Land off Duffs Hill has been ruled out through the Site Options Assessment prepared in support of the Plan</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>None</li> </ul>		
<b>Policy GLEM 1 - Spatial Strategy</b>		
Anonymous		Because we are just losing more countryside to a development of houses we don't need! there are new build sites everywhere and no one is buying those houses as it is! this will ruin the village and you won't retain the people that already live here, people have moved here to get away from built up areas and enjoy the countryside but this is just taking away more countryside and making a small village more built up.
Anonymous		Because we are just losing more countryside to a development of houses we don't need! there are new build sites everywhere and no one is buying those houses as it is! this will ruin the village and you won't retain the people that already live here, people have moved here to get away from built up areas and enjoy the countryside but this is just taking away more countryside and making a small village more built up.
M Crowley		The proposed development will have an adverse impact on the landscape setting, it will result in irreversible loss of agricultural land, and it will not maintain the distinctive views of the countryside.

Name	Organisation	Comment
N Vyse		Prior investment into the village infrastructure and economy.
L Crofton		This is more of an observation. With reference to 6.2. Although the chart is vague, it is clear the vast majority of those who took the time to fill in the village survey wanted no more than 100 new homes built over the next 20 years, yet in just one development (Park Lane) there are over 100 homes going here alone. My guess is there will be many more than 100 new homes built in Glemsford over the next 20 years, hence another example of the collective opinion of residents being ignored. This might go some way to explain why so few people made the effort to complete the village survey.
A Good		However, whilst two sites to the east and west of Duffs Hill looked at by AECOM are not being brought forward, should a developer try to pick these two sites up they would run contrary to Policy Glem 1 particularly in regard to distinctive views and their setting in the landscape. The landscape appraisal would support this conclusion. It is also doubtful whether Highways would allow further traffic movements in Brook Street which agricultural vehicles already find very difficult in traversing. Ask the farmer !
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	<p>Bloor Homes agree with the need for Neighbourhood Planning to support policies in the adopted Local Plan.</p> <p>Bloor Homes do not however agree with the proposed amendments to the settlement boundary as currently drawn. The proposed residential housing allocation (GLEM3) will result in the loss of open land, important to the rural character of Glemsford in a highly visible and accessible area of the village. Bloor Homes would support Glemsford in reconsidering the revised settlement boundary and wider spatial strategy for reasons set out within this consultation response.</p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>The Census indicates that the number of households in Glemsford grew by 20% in the 20 years to 2021, averaging just under 14 a year. The growth proposed in the neighbourhood Plan would equate to under 8 households a year, a significant slowing down of the rate of growth.</li> <li>The Plan has to take a balanced approach between contributing towards the delivery of much needed housing and ensuring that the most important elements of the natural and historic environment are protected and that services and infrastructure have or are capable of having sufficient capacity</li> </ul>		



Name	Organisation	Comment
<ul style="list-style-type: none"> <li>Proposals for development off Duffs Hill would be contrary to the Local Plan and Neighbourhood Plan, the starting point for making decisions on planning applications.</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>None</li> </ul>		
<b>Chapter 5 - Planning Strategy general comments</b>		
Anonymous		I do not agree with this
Anonymous		I do not agree with this
R Newman		Ensure that affordable housing will be available for young couples to allow them to remain in the village if so desired
M Crowley		The JLP - Policy L1 - The proposed development does not maintain the Local Landscape Designation. NPPF tightens the rules about building in the countryside on agricultural land.
N Vyse		The expansion on the Hartest side of the village appears poorly placed or thought out.
A Good		Would have expected to see a housing needs assessment to support the strategy. Perhaps I have missed it.
L Pearce		Due to the lack of Jobs/ Industry in the local area and the additional pressure that will be placed on services such as the school and doctors surgery Glemsford and the surrounding area is not suitable for any more development and as the only source for development is arable land it needs preserving as food security will be a thing of the future and all arable land needs protecting
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	<p>While Bloor Homes agree with the proposed planning strategy, they do not agree with the revised settlement boundary as it is currently drawn.</p> <p>Rainier Development are currently promoting allocation GLEM3 for up to 230 dwellings on their website (<a href="https://rainierdevelopments.co.uk/track-record/glemsford/">https://rainierdevelopments.co.uk/track-record/glemsford/</a>). This is far greater than the necessary housing</p>

Name	Organisation	Comment
		requirement of up to 100 dwellings as set out in the draft Neighbourhood Plan. Furthermore by establishing the principle of development within the settlement boundary, this is likely to result in a far higher density scheme being brought forward by the developer which would lead to the loss of a significant area of green space, important to the special character of Glemsford.
	Babergh District Council	<p>In the second sentence of <b>para 5.2</b>, the quoted JLP Policy SP03 text should read: '<i>..., <del>or in a</del> it is in accordance with a made Neighbourhood Plan, ...</i>'.</p> <p>Staying with para 5.2, while there is no intention to update JLP Part 1, you may wish to add a footnote to explain to readers that what was NPPF paragraph 80 is now NPPF paragraph 84 (Dec 2023).</p> <p>In <b>para 5.3</b>, a minor modification is needed in third sentence. Replace the full-stop with a comma: '<i>... since that time, and does not reflect ...</i>'.</p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>There is no local landscape designation in Glemsford parish. It was removed from the Joint Local Plan when Part 1 was adopted in November 2023.</li> <li>The development proposed by Rainer is noted but it would be contrary to the neighbourhood Plan in its current form.</li> <li>The suggested amendments put forward by Babergh DC will be made.</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Amend paras 5.2 and 5.3 as suggested by Babergh DC</li> </ul>		
<b>Policy GLEM 2 – Housing Delivery</b>		
A Fanning		Do not agree with the area on Map 4 proposed site 1 between Chequers Lane and Mill House. Don't understand the reasoning behind this decision.
Anonymous		you mention to 'Ensure that the amount, size and tenure of new housing in Glemsford meets locally identified needs' there isn't a need for housing here, there are currently 37 houses in glemsford on the market that people aren't buying why would you want to put more here!

Name	Organisation	Comment
Anonymous		you mention to 'Ensure that the amount, size and tenure of new housing in Glemsford meets locally identified needs' there isn't a need for housing here, there are currently 37 houses in glemsford on the market that people aren't buying why would you want to put more here!
R Newman		Agreed
M Crowley		Brownfield/Windfall sites and infill should be allowed, (each planning application on its respective merit and in line with local and national planning policies) within the settlement boundary. NPPF - Disused agricultural barns - again each proposal on merit and within policy.
N Vyse		The expansion on the Hartest side of the village appears poorly placed or thought out.
L Crofton		My main point of contention is the number of "at least 100 homes" will be developed in the coming 20 years. Why is this not worded "no more than 100" given the majority of Glemsford residents clearly wanted a Maximum of 100. It begs the question why ask us how many homes we feel acceptable when the actual number is dictated regardless. I hope the parish council is doing everything it can to resist Babergh's inappropriate building allocation numbers.
A Good		Whilst I think it is inevitable that the Park Lane site is being put forward and is the best option, it needs to be accompanied by highway improvements particularly road definition which is poor for the most used access into the village. This should be a S106 requirement. The masterplan/concept in fig. 1 does not appear to reflect the need for a greater proportion of detached houses which are in short supply in the village. Glemsford is a core village but it is not the most sustainable compared to some others given its total lack of secondary education premises, sub standard roads (neglected by SCC), and it's linear nature. Continued infilling is inevitable but as stated earlier, infill plots should reflect the local character and be of good design. Failure to address this will simply add to the fragmented nature of the street scene.
L Pearce		NO MORE BUILDING!!!! By the parishes own statement the school is near full capacity, The roads are already congested and getting an appointment at the surgery is near on impossible. The water supply that comes out of the tap is over treated and un-drinkable. Stanstead , Cavendish , Hawkedon , The Belchamps and Pentlow have not had any major housing developments in the 40 years I've lived in tis area so why should Glemsford be seen as a cash cow for these developers??? The reason Glemsford is the size it is is due to the amount of industry that was once in the area and this is simply not here any more thus making any development unsustainable.



Name	Organisation	Comment
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	<p>Bloor Homes are committed to ensuring Glemsford can provide at least 100 dwellings in the Neighbourhood Plan area between 2023 and 2037.</p> <p>Bloor Homes have an option on land west of Duffs Hill which extends to approximately 11.17 hectares and could provide up to 100 dwellings with community benefits, biodiversity net gain, landscaping and PROW enhancements. An area of this Site was assessed as part of the Neighbourhood Plan preparation however the wider site ownership could accommodate the required number of dwellings with appropriate mitigation from a landscape perspective. Further details are set out within a landscape opinion prepared by CSA Environmental which can be shared under separate cover.</p>
	Babergh DC	We have no specific comments to make at this stage on Policy GLEM 2
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• Site 1 on Map 4 was put forward by landowners for consideration for development. It has not been included in the neighbourhood Plan</li> <li>• The Plan is addressing housing requirements for the period to 2037. It takes a while for sites to be developed and it would be unlikely that houses on the site allocated in the Plan would be available before 2027.</li> <li>• The Plan does not rule out windfall and infill sites within the Settlement Boundary, but such an approach is unlikely to provide sufficient homes to meet future needs in the village.</li> <li>• Local and Neighbourhood Plans cannot place a cap on the number of homes to be built in a village as suitable windfall and infill plots will always come available during the lifetime of a Plan.</li> <li>• Figure 1 is a concept to guide the more detailed planning application. The application will determine the mix of detached, semi-detached etc</li> <li>• The County Education Department has indicated that, based on a development of 100 dwellings, there would be a need for 25 primary pupil places based on current estimated pupil yield calculations. Based on the current forecasts, an additional 25 pupils could be accommodated at the school if development came forward at the end of the five-year forecast period (2027/28).</li> <li>• Stanstead, Cavendish, Hawkedon, The Belchamps and Pentlow do not have the level of services that Glemsford has and so are less sustainable locations for development</li> <li>• Land off Duffs Hill has been ruled out through the Site Options Assessment prepared in support of the Plan</li> </ul>		
<b>Proposed changes to Plan</b>		

Name	Organisation	Comment
<ul style="list-style-type: none"> <li>None</li> </ul>		
<b>Figure 1 - Site Development Concept comments</b>		
A Fanning		The proposed green area should also include an area for older teenagers to hang out, to often this group are disregarded and make there own entertainment to other's detriment. (Consult Sible Hedingham council they have installed an area for older teenagers).
Anonymous		I don't think more houses should be built here
Anonymous		I don't think more houses should be built here
R Newman		Access to proposed housing site can be already in place via kings road with at least two access roads in place. Why not use them?
M Crowley		I disagree with the proposed site allocation on land south of Kings Road, west of Park Lane. I do however, support brownfield/windfall and self-build and in particular eco dwellings.
N Vyse		The expansion on the Hartest side of the village appears poorly placed or thought out.
L Crofton		Observation that the Park Lane development plan states 100 homes, however the plan/drawing appears to show approximately 110-111 homes. This may just be an inaccurate "there or thereabouts" architects drawing I realize this but it does not instil confidence when there is a 10% discrepancy in the number of homes purported on the village plan details and the number counted on the proposed plan.
A Good		See above.
P Jackson		<p>1) Information to justify this development has been based upon the 2018 Village Questionnaire where it is hard to see how responses raised then have been addressed in the last 5 years. Glemsford is a worse place to live now than in 2018.</p> <p>2) This development has a single access from Park Lane. Park Lane is already an inadequate road and now an additional 200+ vehicles are to have access to it. Speed limits are consistently NOT been adhered to. Road condition is poor (gullied edges). Road too narrow. Water collects at junction with Lower Road etc etc.</p> <p>3) Traffic movements will pass through Kings Road (at Park Lane) or Drapers Lane to access village "amenities" creating even more congestion and potential dangers. Drapers lane is too narrow and difficult to drive safely through. Kings Road is largely a single file road. Drivers blatantly ignore the highway code and rule 243 within it.</p>

Name	Organisation	Comment
		<p>3) This development is disconnected from village and amenities. The proposed pedestrian and cycle routes I anticipate would not be used. The development is too far from school and doctors for residents to consider walking or cycling - look how many locals use cars to access school and doctors now. Any pedestrian or cycle route through our village is already fraught with dangers re pot holes and on-road &amp; pavement parking.</p> <p>4) It's not clear from the concept drawing how two car parking is being designed "on plot". Is it side by side or one behind the other. As with elsewhere in the village too many residents with a driveway will park one car on-plot, and another goes on the road. How many additional "white vans" are to be catered for? The visitor car parking spaces will be used and "adopted" by the house holders for non-visitor use. It will then look like the rest of the village!</p> <p>5) Why has 11.4 hectares been given over to a play area - surely a relocation of the doctors surgery with parking should have been considered - the current surgery is not fit for purpose now. How is it going to cope with 2-3-400 extra residents?</p> <p>6) How is Glemsford School going to find space for the new youngest residents that will come with this new development?</p>
L Pearce		The area is currently an arable field and needs to stay that way to help provide food security and a home for the sky larks that reside in it during the spring and summer months, The extra traffic would make Hobbs Lane dangerous
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	Bloor Homes are aware that Rainier Developments are promoting the same land to the west of Park Lane for 230 dwellings on their website ( <a href="https://rainierdevelopments.co.uk/track-record/glemsford/">https://rainierdevelopments.co.uk/track-record/glemsford/</a> ). Their website includes a high density concept plan which is not consistent with the version submitted to the Neighbourhood Plan and demonstrates their wider ambition and intentions for the land. The concept plan in the Neighbourhood Plan is contrary to National Planning Policy Chapter 11 and does not result in an efficient use of land as demonstrated, the land could accommodate up to 230 dwellings. This inefficient use of land should not be supported.
C Mills	Savills UK Ltd on behalf of Rainier Developments	These representations are submitted on behalf of Rainier Developments, who are the promoter of the site identified as draft allocation GLEM3 (land west of Park Lane). Rainier Developments support the draft allocation and wish to reiterate their commitment to ensuring the delivery of a high quality scheme that takes into account the views and needs of existing residents so that a cohesive development results that can be considered an asset to the village. However, in order to achieve this, Rainier Developments would



Name	Organisation	Comment
		<p>welcome to engage with the Parish Council as part of the emerging Neighbourhood Plan process to meet and discuss particular aspects of the draft allocation. For instance, there are certain aspects within the Site Development Concept at Figure 1 which may need further consideration. It is therefore suggested that whilst including a concept design may give reassurance to some residents on what may come forward, at this stage it appears overly detailed and it may not necessarily be the most appropriate solution once potential alternatives and/or all technical matters are fully considered. It is therefore suggested that the 'Site Development Concept' provided at Figure 1 should instead be titled 'Illustrative Layout Option'. This would better reflect the supporting text already provided within the Draft Neighbourhood Plan which identifies the plan in paragraph 6.20 as an "illustrative site concept diagram".</p>
	Suffolk County Council	<p><i>Land West of Park Lane</i></p> <p>Regarding the proposed housing development allocation west of Park Lane, as shown on Figure 1 (Site Development Concept), bearing in mind that this is currently in the conceptual state, SCC notes that the residential streets appear entirely void of any planting, and that they are certainly not tree-lined, as envisaged in paragraph 136 NPPF December 2023. SCC is concerned that the scheme relies too heavily on trees or vegetation within the private back gardens, where their retention cannot be secured and the amenity value for the public realm will be limited. The new, central green space is welcome, although there is a danger that it is split in half by the wide corridor that runs through its centre.</p> <p>Paragraph 6.22 and Figure 1 (Site concept and design), plus any new development layout should accord with Suffolk Design: Streets Guide (2022) and the parking with Suffolk Guidance for Parking (2023).</p>
<p><b>Parish Council response</b></p> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• Kings Road is not suitable for accessing a site of this size, but pedestrian links are sought</li> <li>• The Concept Drawing in Figure 1 is to guide the preparation of planning applications, as noted in Policy GLEM 3. It is not a detailed approach and the Parish Council seeks to cap the development at 100.</li> <li>• The development proposed by Rainer is noted but it would be contrary to the neighbourhood Plan in its current form.</li> <li>• Any development on the site would also need to conform with other policies in the development plan.</li> </ul>		
<b>Proposed changes to Plan</b>		

Name	Organisation	Comment
<ul style="list-style-type: none"> <li>None</li> </ul>		
<b>Development Principles in paragraph 6.22 comments</b>		
A Fanning		Any adjacent or existing footpaths should be upgraded e.g. wood chip or gravel.
Anonymous		I don't want more houses built in the village
Anonymous		I don't want more houses built in the village
M Crowley		I refer back to all of the objections made in 2017 by the electorate/local residents. Historic England also objected. The only body in favour was Glemsford Parish Council. The Parish Council is in office to serve local people as the first tier and grass-roots level of local government. It would be good if Councillors could please listen to and represent the strong feeling of residents.
M Hyett		Current utility infrastructure is under strain and in particular the sewage system. The proposed site looks likely to utilise an existing main sewage drain which has on a number of occasions allowed sewage to enter the water course as well as roads and house fronts. As part of the principles then adequate supply and service without impact to existing and established properties should not be included.
A Good		Yes but see above in housing delivery. Pleased to see connectivity and access is a key principle as is green space. Not sure that a developer will accept phasing but worth a try.
L Pearce		Its not as 'Green' as leaving it as a field and the village cant cope with 100 more homes!!!!
C Mills	Savills UK Ltd on behalf of Rainier Developments	<p>Rainier Developments support the majority of the development principles included at paragraph 6.22. However, certain principles are questioned and further clarification or consideration is considered necessary as follows:</p> <p>1. Phasing. As part of the Neighbourhood Plan and it's evidence base, it is unclear why a site of this size would be split into two phases, with an arbitrary timeframe of 2031 identified for the second phase. It does not appear that this timescale has taken into account market demand or conditions. Whilst the draft Neighbourhood Plan references that it would help assimilate the development into the village a cohesive single scheme would allow a more coordinated approach to various technical elements, specifically the delivery of site wide infrastructure, public open space and strategic landscaping, as well as ensuring a coordinated approach to the delivery of any off-site infrastructure works and/or improvements to local services and facilities that may be required.</p>

Name	Organisation	Comment
		<p>2. Open Space. The Development principles include a requirement for a minimum of 5 hectares of open space. However, this figure is in excess of Local Plan policy requirements for the number of expected residents generated by the proposed development and there does not appear to be a study referenced that identifies a particular shortfall within the village. In fact, policy GLEM10 indicates that the village benefits from an excellent range of green spaces, with a number being proposed as Local Green Spaces. Whilst Rainier Developments does not oppose the delivery of a substantial area of open space as part of the development, it is considered important that any requirement in excess of the Local Plan policy requirements should be justified with reference to a supporting evidence base.</p> <p>3. Two storey dwellings. The development principles appear to suggest only two storey dwellings would be acceptable. Such a restriction would limit the opportunity for bungalows, which we assume is not the intention here. It is therefore suggested that the Neighbourhood Plan could be modified to confirm "... all the buildings will be no more than two storeys in height ...".</p> <p>4. Buildings arranged with frontages perpendicular to the roadline. This requirement is considered too prescriptive and fails to acknowledge scenarios where particular site circumstances may benefit from greater variety or frontages, whilst also respecting good urban design principles such as ensuring that areas of open space are overlooked. Such variety can help support the integration with, and reflect the characteristics of, a more historic settlement. It is suggested that the subsequent requirement that 'Each parcel should have a relationship with the open space and surrounding street network in some shape or form' is re-considered to provide better flexibility and should be retained without the preceding bullet point.</p>
	Suffolk County Council	Paragraph 6.22 and Figure 1 (Site concept and design), plus any new development layout should accord with Suffolk Design: Streets Guide (2022) and the parking with Suffolk Guidance for Parking (2023).
	Babergh DC	As a link to Objective 12, our Sustainable Travel Officer has suggested you might want to add an additional point, after the fourth bullet under 'Movement and access' in para 6.22 as follows:



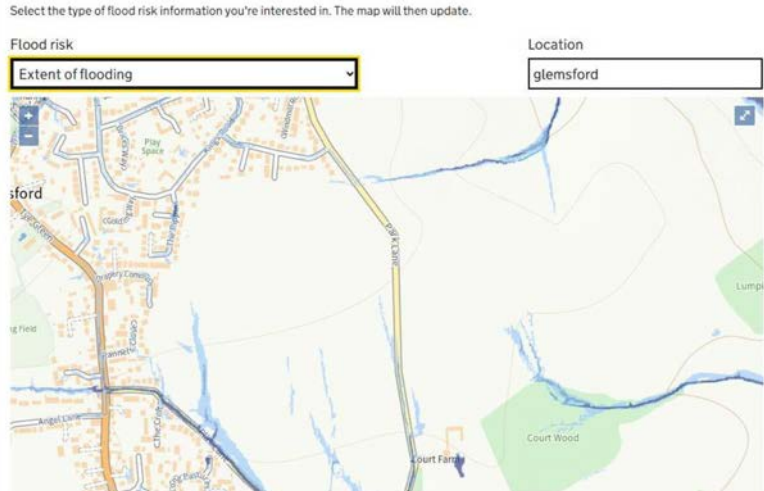
Name	Organisation	Comment
		"These improvements to the active travel provision across and along Park Lane would support the wider ambition for better cycling and walking connectivity between Glemsford and Long Melford, as identified in Babergh District Council's Local Cycling and Walking Infrastructure Plan"
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• Anglian Water has not raised any concerns in relation to capacity, but this will be a matter for further investigation when the developers prepare the planning application.</li> <li>• The development of this site in one go, without phasing, would likely overwhelm the village and it is considered that gradual growth would be more appropriate.</li> <li>• The open space is not just to meet the requirement of the development but to provide a development that delivers positive gains for the community in reflection of the proactive approach to identifying land for development in the village.</li> <li>• The development principles will be amended to a "maximum of two storeys" to enable bungalows to be included in the development.</li> <li>• The relationship of buildings to road frontages and the open space is considered appropriate to secure a well designed development.</li> <li>• Bullet point 4 under Movement and access will be amended to take account of Babergh's comments</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>• Amend bullet point 4 under Movement and access to reflect the wider ambition for better cycling and walking connectivity between Glemsford and Long Melford, as identified in Babergh District Council's Local Cycling and Walking Infrastructure Plan.</li> </ul>		
<b>Policy GLEM 3 - Land west of Park Lane</b>		
I Homer		Totally oppose any development on this area. Park Lane is a busy thoroughfare which has a history of accidents and this would add to the already rising traffic flow. Traffic would increase considerably through the village which already has problems with traffic flow. The natural area would be disturbed to a detrimental respect relating to already dwindling wildlife. This area is very popular with walkers to enjoy the natural open surrounding area and this would severely detract them from enjoying this area. Crime rates and anti social behavior are already rising locally and this development would increase it even more so. The village does not have the capacity relating to infrastructure, education and healthcare to cope with any further large development.

Name	Organisation	Comment
I Short		I think like a lot of residents, that Glemsford has already delivered its fair share of housing to Babergh. I would be very sorry to see yet another large open space currently used by dog walkers and the wider public lost to housing. The sun-rise view east from Drapery common would be changed forever by a field full of houses. Park Lane's traffic count would increase hugely no doubt, along with the associated dangers there. The vehicles from the new housing leaving Glemsford and heading west would either have to travel down Park Lane or come through the village and down Skates Hill which is already blighted with parked cars and traffic. I am against the development proposed under GLEM 3 therefore. I am not against smaller 10-20 home developments. However, I think 100 on one site is excessive and will adversely affect those residents in Kings Road and Drapery common who no doubt purchased their homes because of the views across the countryside and the sunrise.
R Newman		Agreed
M Crowley		I support brownfield/windfall plots and self-build eco builds.
L Crofton		If Glemsford has no alternative then yes, this is the most logical option.
P Jackson		Definitely NO. Glemsford need to address the issues raised in the 2018 Village Questionnaire.
L Pearce		I would like it to not go ahead altogether, Surely as residents of Glemsford we have a right to remain rural
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	<p>Bloor Homes do not consider land west of Park Lane to be a suitable residential allocation within the Neighbourhood Plan. The Village Survey favored smaller residential developments of 51 to 100 dwellings with the Neighbourhood Plan Policy GLEM 2 providing for at least 100 dwellings.</p> <p>On their website, Rainier Development are promoting land West of Park Lane for 230 dwellings (<a href="https://rainierdevelopments.co.uk/track-record/glemsford/">https://rainierdevelopments.co.uk/track-record/glemsford/</a>) and therefore if allocated, the developers intentions are likely to deliver far more than 100 dwellings on the land as set out within the Neighbourhood Plan and contrary to GLEM 2.</p> <p>Furthermore, the SHLAA (October 2020) considered the net developable site area as 4ha to the north of the site. This is to avoid disproportionate development and significant heritage &amp; visual impacts in the sensitive landscape area.</p>

Name	Organisation	Comment
C Mills	Savills UK Ltd on behalf of Rainier Developments	Rainier Developments is the promoter of the site known as land west of Park Lane and can reiterate their support for the allocation of this land for development and provide assurance as to its deliverability. However, as already expressed in response to question 6 relating to Figure 1, the over reliance on the Concept Diagram is questioned. Numerous development principles are listed within paragraph 6.22 and referenced within the draft policy. It is considered that these principles provide sufficient certainty that the site can deliver the expected requirements. The specific reference in GLEM3 to delivering the development 'in accordance with the Concept Diagram' at Figure 1 does not provide sufficient flexibility or acknowledgement that the Concept Diagram has been produced at a very early stage without the benefit of the site-specific technical information that usually informs more detailed layouts. As such, it is suggested that reference to the Concept Diagram is either removed from policy GLEM3 or, if the reference remains, there is an acknowledgment that there is scope for flexibility to accommodate alternative solutions.
	Anglian Water	<p>It is noted that the Masterplan Report produced by AECOM takes into account our rising main (pressurised sewer) running through the site in section 3.5 and advises that a 3 metre easement both sides of the pipe must be considered. It would appear that this has been accommodated through the design layout with the route of the sewer under footpaths, roads, and public open space, to ensure that access can be maintained for essential repairs/maintenance and avoiding the need for a diversion. Please be aware that some assets may have a formally registered easement associated to them, or laid deeper than nominal depth of cover (0.9m), which may impact on the easement width. An application will need to be submitted to us for proposals to build near a public sewer and details can be found on our website.</p> <p>When development proposals are being prepared for the site, including more detailed designs, we would advise early discussion with our Pre-development Team regarding the layout to ensure that sufficient measures have been incorporated regarding our underground asset crossing the site, and in terms of water supply and sewer connections. Further advice can be found on our website <a href="https://www.anglianwater.co.uk/developing/">https://www.anglianwater.co.uk/developing/</a></p> <p><b>Water Efficiency [Policies GLEM3 and GLEM11]</b></p> <p>As a region identified as seriously water stressed we encourage plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through</p>



Name	Organisation	Comment
		<p>rainwater/storm water harvesting and reuse, and greywater recycling. Our revised draft water resources management plan for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies.</p> <p>We recognise that the Babergh and Mid Suffolk Joint Local Plan Part 1 Policy LP23 requires all residential development to meet the higher water efficiency standards of 110 litres/person/day (l/p/d), but encourage developments to achieve water usage of 100 l/p/d - incorporating water re-use and recycling, rainwater and stormwater harvesting and other suitable measures.</p> <p>The Defra <a href="#">Integrated Plan for Water</a> supports the need to improve water efficiency and the Government's <a href="#">Environment Improvement Plan</a> sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. The <a href="#">Written Ministerial Statement</a> issued by the Secretary of State for Levelling Up Housing and Communities on 19<sup>th</sup> December 2023 highlighted the issue of water scarcity, particularly for locations such as Cambridge and areas of serious water stress (including the whole of the Anglian Water region) and indicated that further consideration would be given to building regulations to enable local planning authorities to introduce tighter water efficiency measures.</p> <p>The Glemsford Design Guidance and Codes - code DC10 Sustainable Homes references water management, more ambitious water efficiency standards, and the use of sustainable drainage systems to facilitate individual property and community scale rainwater harvesting systems.</p> <p>Given the proposed national and Local Plan approach to water efficiency, Anglian Water would encourage a water efficiency standard of 100 l/p/d to be included in the neighbourhood plan as a general requirement for new residential development design standards (Policy GLEM11 Development Design) and/or as a requirement in Policy GLEM3 Land West of Park Lane.</p>

Name	Organisation	Comment
	Suffolk County Council	<p>Regarding Policy GLEM3 (Land west of Park Lane), for information, this large site is in an area that is topographically favourable for early activity, and it has not been systematically assessed for archaeological remains. Finds recorded suggest occupation from the prehistoric through to medieval periods in the wider vicinity. Archaeological field evaluation will be required at an appropriate design stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. In this case, geophysical survey in the first instance will inform the extent and timing of trial trenching.</p> <p>SCC suggests that Policy GLEM3 could benefit from the inclusion of the following text:  <i>"iii. undertake a programme of archaeological evaluation, be informed by its results, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts."</i></p> <p><i>Flooding</i></p> <p>SCC notes that small portions of the eastern edge of the Site Allocation within Policy GLEM3 are at low risk of surface water flooding according to the Environment Agency's National Predicted Surface Water Flood Maps (as below).</p> 

Name	Organisation	Comment
		<p><i>Adaptable Homes and an Ageing Population</i></p> <p>It is important to ensure the needs of all residents are catered for, recognising the likely increase of co-morbidities as people get older. It is suggested that the plan show specific support for residential development proposals that provide homes that are adaptable and accessible (i.e., built to M4(2) standards). This can help meet the needs of elderly and frail residents, allowing them to maintain independence for longer, but also allowing for younger occupants and families.</p> <p>SCC is not recommending that the neighbourhood plan sets an additional technical standard (which is against the Ministerial Statement 2015),<sup>3</sup> however, it is suggested that support is shown for adaptable homes in the plan, which can help the village meet the needs of an aging population.</p> <p>Therefore, it is suggested that the following text be added to Policy GLEM3:</p> <p>"Housing proposals should provide a mix of sizes and types in accordance with the most up-to-date evidence on objectively-assessed housing needs.</p> <p><u>Support will be given for homes that are adaptable and accessible (meaning built to optional M4(2) standards) in order to meet the needs of the aging population, without excluding the needs of the younger occupants and families.</u></p> <p><u>Development proposals of 10 dwellings or more should be accompanied by a Building for a Healthy Life Assessment<sup>4</sup> that determines how the development contributes to the quality of Glemsford as a place to live."</u></p> <p>Our previous comments (reproduced in Appendix 1 to this letter) [set out below] regarding the residential allocation GLEM3 accessed via Park Lane still apply.</p> <p>We do not consider Parklands Close suitable to accommodate access to large scale development, although it may be suitable to access a limited number of dwellings, subject to improvements.</p> <p>There is no footway provision along Park Lane and the majority of it has a 60 mph speed limit, meaning that visibility splays of up to 215m in both directions would be necessary and it is unclear if this could be achieved. We would require a footway to at least the access point/s.</p>

Name	Organisation	Comment
		<p>The development would require sustainable links (inc. cycling) to the north and west and it is unclear whether this can be achieved to the west, given the limited width of the existing footpath connections.</p> <p>It is unlikely that a development of less than 150 dwellings would result in significant traffic impact in this location.</p> <p>The indicative layout with long sections of straight roads would not be supported or suitable for adoption, as this type of layout tends to encourage higher vehicle speeds.</p> <p>There are no definitive red flags at this stage but further details of access, sustainable connections, dwelling numbers and phasing would be required to provide a definitive response.</p> <p>If allocated we would recommend requirements for:</p> <ul style="list-style-type: none"> <li>• walking and cycling links to the north and west of the site;</li> <li>• provision of footway along Park Lane to the site access;</li> <li>• safe, suitable vehicular access;</li> <li>• a permeable site layout that prioritises active travel and creates a low vehicle speed environment</li> <li>• planning application should be submitted with a transport assessment and travel plan in line with SCC travel plan guidance</li> </ul> <p>Regarding imposing a 30mph speed limit on Park Lane, as identified in part i. of Policy GLEM3, this is not suitable in its current guise. However, if a continuous footway, access, and development frontage were provided, then it may be appropriate. Speed limits cannot be guaranteed, as there is a legal consultation process – Traffic Regulation Order, so this could not be a condition of new development.</p>
	Babergh DC	<p>This policy seeks to guide development of this site to deliver 100 dwellings and recreational open space. We have no objection in principle to this allocation but please note the following:</p> <ul style="list-style-type: none"> <li>• We see that the allocation is informed by the 'Site Options &amp; Assessment Report' and, subsequently by the 'Masterplan &amp; Development Principles' report, both commissioned from AECOM. Within Chapter 2,</li> </ul>



Name	Organisation	Comment
		<p>and on page 28 of the latter, it is disappointing that the misspelling of Babergh was not corrected. Under section 2.1 of the same report, it should also have referred to the emerging 'Babergh and Mid Suffolk Joint Local Plan'</p> <ul style="list-style-type: none"> <li>• It is expected that the Parish Council will closely monitor the delivery of this site and that they will take appropriate steps to update this Plan should circumstances change. The views of other consultees, particularly those of Suffolk County Council, may also be relevant.</li> </ul>
<p><b>Parish Council response</b></p> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• The County Highways Department has not objected to the delivery of the development and has identified further details of mitigation at the planning application stage.</li> <li>• The site is not public open space and therefore creating a large open space as part of the development would allow legal access to the area.</li> <li>• The development proposed by Rainer is noted but it would be contrary to the neighbourhood Plan in its current form.</li> <li>• The Concept Plan and Development principles provide a framework against which detailed proposals can be prepared and considered. If a developer wishes to move away from those principles then it will be necessary to provide robust evidence as to why, but any development should remain in accordance with the planning policies of the local and neighbourhood plans.</li> <li>• Without robust viability evidence relative to the housing market in Glemsford, it would be difficult require more stringent water use requirements in the Plan over and above the Local Plan. Policy GLEM 11 will, however, be amended to encourage lower levels of water usage in new homes.</li> <li>• Local Plan Policy LP23 - Sustainable Construction and Design already encourages development to achieve water usage of not more than 100 litres per person per day.</li> <li>• The additional point concerning archaeological investigation will be included in the Policy</li> <li>• Policy LP06 already requires that 50% of homes are built to Part M4(2) standard and it is not necessary to include that requirement in the Neighbourhood Plan</li> <li>• The requirement for all proposals to demonstrate how they meet the Development Checklist in Appendix 3 is a locally based approach to delivering high quality development and it is not considered necessary to include a requirement to satisfy the Building for Healthy Life Assessment too.</li> <li>• The comments concerning highways are noted</li> </ul>		

Name	Organisation	Comment
<b>Proposed changes to Plan</b>		
<ul style="list-style-type: none"> <li>Amend Policy to include wording suggested by Suffolk CC concerning archaeological investigation</li> </ul>		
<b>Policy GLEM4 – Affordable Housing on Rural Exception Sites</b>		
I Homer		These kind of developments would be better suited to brown field sites.
R Newman		Agreed
M Crowley		There is already a large proportion of social housing in the Village. The Housing Associations who primarily operate this housing do not always maintain land in their ownership. I live in a mixed private/social housing road and I have had issues with Associations not responding even in relation to health and safety issues.
N Vyse		Building should focus on sustainability and low energy as well as affordability. So they are carbon neutral.
L Crofton		I fully expect the council will be inundated with offers from landowners giving away cut price building plots.
A Good		Yes where the market does not deliver but such sites should have central connectivity and not corrupt the importance of the landscape to the village. Beware developers and greedy farmers that believe any land just outside the settlement boundary is a candidate for an exception site with more market housing than affordable housing. Would like to see a definition in the NP of what is affordable in terms of the Glemsford population and housing values which are less than the Babergh average.
L Pearce		It doesn't matter if you call them affordable housing, with the lack of job prospects in the local area no one local can afford them anyway so no one local will buy them. And knowing what these developers are like they probably wont get built anyway, they will just build more expensive ones instead
	Suffolk County Council	<p>SCC has concerns regarding Policy GLEM4 as it appears to open the countryside for development, in opposition to Policy GLEM1 (Spatial Strategy).</p> <p>Therefore, the following minor addition is proposed:  “Applications for such development will be considered in relation to the appearance and character of the surrounding area <u>and landscape</u>, the potential impact on residential amenity and highway safety.”</p>

Name	Organisation	Comment
	Babergh DC	<p>As written, GLEM 4 is a tried and tested policy that appears in a number of adopted NPs. However, the reference to NPPF paragraph 72 is no longer relevant and needs addressing.</p> <p>The simple solution would be to remove the NPPF reference altogether, but what is now NPPF paragraph 73 also seems to point towards local communities taking a more proactive role in bringing forward their own sites to meet locally identified affordable housing need. You may have your own interpretation of the NPPF changes, and a re-working of para's 6.24 to 6.28, and Policy GLEM 4 may be necessary. We do not have any immediate suggestions but separate conversation about this may be necessary.</p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• The reasoning behind allowing affordable housing outside the Settlement Boundary as an exception is that the land price and development costs would be less, thereby helping with affordability of the development. Brownfield sites are typically much more expensive to develop due to the potential for contamination being present.</li> <li>• The County Council will be aware that this approach is promoted in the NPPF and that all other relevant policies in the Development Plan will need to be considered, including potential landscape impact. It is not therefore necessary to include the suggested amendment in the policy.</li> <li>• The comments made by Babergh DC are noted and necessary amendments will be made to the policy and supporting paragraphs to reflect changes to the NPPF in December 2023 and any further amendments should the new NPPF be published before the Plan is submitted.</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>• Amend the policy and supporting paragraphs to reflect the publication of the NPPF in December 2023 and its reference to community led affordable housing</li> </ul>		
<b>Chapter 6 - Housing comments</b>		
I Homer		Currently this village location has increased considerably due to over development and it is questionable as to whether it should still be classed as a village due to its ever expanding size and population.

Name	Organisation	Comment
A Fanning		Any Council owned brown fill site land should be given to a developer to sell as affordable housing to local residents basically purchasing a home where the land is free. Tied in for an agreed time.
M Crowley		Historic England objects to the site - south of Kings Road, west of Park Lane back in 2017 as the site has an adverse impact upon the historic village setting.
N Vyse		Planning should benefit the community by being zero carbon, cheap to maintain, affordable and. OT adversely impact the stretched resources of the local infrastructure.
J Webb		Would like to see suitable housing for retirement purposes included particularly as there is a large percentage of older people who live in the village - maybe a sheltered housing scheme?
M Hyett		My comments made in Q7. Should we not include utility surveying to ensure the houses can be supported without impacting existing housing and infrastructure, having the land is just one part of the puzzle.
L Crofton		The affordable housing provision should be designed so that it is 'tenure blind' (so that it is indistinguishable from open market housing). What provisions are being made to prevent the "affordable housing tenants" from outing themselves. This method of tenure blind building is commonplace but it soon becomes apparent over time who "owns" and who doesn't.
A Good		Included above.
L Pearce		the village has been developed too much and needs to be preserved or it will be like a town
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	As demonstrated in the Neighbourhood Plan Village Survey, residents supported 51 to 100 new dwellings across the plan period with most favouring smaller residential developments as a means to delivering them. In its current form, the Neighbourhood Plan allocates a single greenfield site in a central village location capable and being promoted for up to 230 dwellings.  Bloor Homes would support the parish Council in reconsidering the site allocations and settlement boundary to ensure sustainable residential development within the neighbourhood plan area of Glemsford. Land west of Duffs Hill was partially considered suitable for residential development as part of the SHLAA (October 2020) however not taken forward as a Neighbourhood Plan allocation. This site could deliver significant benefits from a landscape and accessibility perspective, ensuring development is



Name	Organisation	Comment
		delivered in a way supported by residents while meeting the residential housing needs set out within GLEM2.
	Suffolk County Council	SCC recommend including an additional bullet point to paragraph 6.1, to provide some additional detail about demographics of the parish: <i>"• 24.8% of residents are aged 65+, this is above the England average of 18.4% and displays an ageing population."</i>
	Babergh DC	para 6.3 - the first sentence should refer to JLP Policy SP01 (not SP02).  para 6.4 & para 6.9 No mention is made in the Policy Context chapter (Chapter 3) of Glemsford being designated as a core village in the draft JLP (Nov 2020). There is also some repetition between para's 6.4 and 6.9 which could be avoided. We suggest amending these two paragraphs to read as follows: 6.4 Recognising that it provided a range of services and facilities to its residents and those from smaller villages in its hinterland, Glemsford was designated as a 'Core Village' in the Babergh Local Plan (2014). This designation was carried forward into the draft Joint Local Plan (November 2020) but, following examination, not into Part 1 of the Joint Local Plan (JLP). Instead, a new settlement hierarchy is likely to be set out at a later date in JLP Part 2.  6.9 Glemsford continues to provide a wide range of services and facilities to meet its own needs and those of its hinterland. Further managed housing growth will help sustain those services and their employees and ensure the continued sustainability of the village.
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• Historic England has not objected to the allocation in the Neighbourhood Plan</li> <li>• Land off Duffs Hill has been ruled out through the Site Options Assessment prepared in support of the Plan</li> <li>• The additional point suggested by Suffolk CC will be added</li> <li>• The Plan will be amended, as appropriate, to reflect the comments made by Babergh DC</li> </ul>		

Name	Organisation	Comment
<b>Proposed changes to Plan</b>		
<ul style="list-style-type: none"> <li>Insert the additional bullet point in paragraph 6.1 as suggested by Suffolk CC</li> <li>Amend paragraphs 6.3, 6.4 and 6.9 to reflect the comments made by Babergh DC</li> </ul>		
<b>Policy GLEM5 - Employment Sites</b>		
R Newman		Agreed
M Crowley		It is good to see GCB Cocoa commencing production and creating 370 local jobs. There is however, no suitable employment site. Glemsford is around 7 miles from Sudbury where housing is cheaper, but travel to work is a fact when living in Glemsford. The JLP provides an opportunity to contribute to improved air quality. Car journeys are already too high.
	Suffolk County Council	SCC would suggest that parts b), c), and e) could be streamlined into one, for ease of reading. Part e) appears to be a slight duplication of the second half of part b).
<b>Parish Council response</b>		
<ul style="list-style-type: none"> <li>The comments are noted</li> <li>It is not considered necessary to amend the policy as suggested by Suffolk CC</li> </ul>		
<b>Proposed changes to Plan</b>		
<ul style="list-style-type: none"> <li>None</li> </ul>		
<b>Policy GLEM 6 - New Businesses and Employment</b>		
I Homer		This is a residential village location and should be kept as such.
Anonymous		Putting more houses in a village will not create more jobs it just creates more people fighting for the same jobs!
Anonymous		Putting more houses in a village will not create more jobs it just creates more people fighting for the same jobs!
R Newman		Agreed

Name	Organisation	Comment
M Crowley		I would support on existing sites already in the Village, but not new sites. Possible change of use may be an option from residential to commercial.
A Good		The photo on page 25 suggests that some discussion with the owner of Clockhouse Farm is needed. Proliferation of signs is not good visually when one large one would suffice !
L Pearce		I do support new small business, but to compare a few old pig sheds at Colin Bloomfields to the infrastructure that was once in the village, Downs , silk mills, Bush broke allen to name a few is a bit of a joke. And in an age where the government is doing what it can to stifle and get rid of the self employed and small business it doesn't really fit putting new developments in an area where the prospects are going in reverse
	Babergh DC	GLEM 6 is fine apart from the first sentence which refers to Settlement Boundaries (plural). This should of course refer to Settlement Boundary' (singular).

#### Parish Council response

- The comments are noted
- The reference to the Settlement Boundaries will be amended

#### Proposed changes to Plan

- Change Settlement Boundaries to Settlement Boundary

#### Chapter 8 - Employment comments

A Fanning		Encouraging local employment is in keeping with the green agenda.
Anonymous		How many people of these 370 are from Glemsford that are going to be working at GCB Cocoa?  Funny that this information is not available - 'Figures on the number of people whose place of work was Glemsford parish were not available at the time the Neighbourhood Plan was prepared' because there aren't any jobs here so I fail to see how creating more homes is going to change that?
M Crowley		Just to add that Glemsford is around 7 miles from Sudbury and residents accept that primarily they need to travel out of Glemsford to the surrounding larger towns for work.

Name	Organisation	Comment
L Pearce		the number of Job prospects in Sudbury is significantly less than 10 years ago
	Suffolk County Council	The photograph underneath this Policy GLEM6 (New Businesses and Employment) has no figure identification. Its purpose is unclear: approving of small business enterprises or critical of commercial clutter.
	Babergh DC	We have no substantive comments to make on this chapter but please note the following: <ul style="list-style-type: none"> <li>There is a full stop missing at the end of para 8.2</li> <li>In para 8.8, avoid unnecessary abbreviations by replacing 'wouldn't' with 'would not'</li> </ul>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>The amendments suggested by Babergh DC will be made</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Amend paras 8.2 and 8.8 as suggested by Babergh DC</li> </ul>		
<b>Policy GLEM7 - Protection of Landscape Setting of Glemsford</b>		
Anonymous		Because it wont be protected with more houses being built
Anonymous		Because it wont be protected with more houses being built
M Crowley		I support the policy but only within the settlement area.
N Vyse		I feel that nature needs greater protection. Work around existing trees and hedges, removing and replacing diminishes the established ecosystem built up over centuries.
A Good		The setting of Glemsford and it's unusually rolling hinterland gives Glemsford its unique character. Excellent landscape appraisal in the full report appendix.
L Pearce		THE ONLY WAY TO PROTECT THE LANDSCAPE IS TO NOT BUILD ON IT AND PRESERVE IT
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	Bloor Homes are sympathetic to the landscape, heritage and rural character of Glemsford and the surrounding Neighbourhood Plan area. CSA Environmental have prepared a Landscape Opinion on Land west of Duffs Hill to provide guidance on the sites suitability for residential development. The opinion



Name	Organisation	Comment
		concludes that through an appropriate scheme and mitigation, residential development could be accommodated on the land and achieved in a way that is compatible with the prevailing pattern of the landscape.  The revised NPPF (December 2023) paragraph 135 also acknowledged planning policies and decisions should be sympathetic to the local character and history while not preventing or discouraging appropriate change.
	Suffolk County Council	SCC welcomes this policy; however, it is noted that it should read "Landscape <u>and</u> Visual Impact <u>Assessment</u> "
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>The amendments suggested by Suffolk CC will be made</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Amend the reference to Landscape <u>and</u> Visual Impact <u>Assessment</u></li> </ul>		
<b>Policy GLEM8 - Protection of Important Views</b>		
Anonymous		Because they wont be protected if more houses are built
Anonymous		Because they wont be protected if more houses are built
R Newman		Agreed
M Crowley		The site on land south of Kings Road, West of Park Lane does not maintain the Local Landscape Designation JLP Policy L1.
N Vyse		Modern architectural style of housing is a ***** eyesore.
C Mills	Savills UK Ltd on behalf of Rainier Developments	Whilst the principle of the policy is supported, it is considered important for the sake of clarity that the policy acknowledges that the development of allocated sites will inevitably lead to a degree of visual change and this may effect some of the Important Views.
	Suffolk County Council	SCC welcomes that Policy GLEM8 refers to important views from public vantage points.

Name	Organisation	Comment
		<p>SCC consider, however, that Policy GLEM8 could benefit from outlining the important views were listed with identifying numbers and names. SCC would note that it does not appear that there was a consultation with regards to key views with the residents of the parish, and that the assessment solely relies on professional judgement. SCC considers that this was a missed opportunity for community engagement.</p> <p>After an introduction concerning the landscape and resulting views around Glemsford, the Appendix contains photographs with titles, number identifiers, and annotations, however, it lacks descriptions.</p> <p>SCC notes that there are insert location maps, identifying the location of the views, however, the views themselves are not identified (although shown) on the map 'Long Distance Views'. Notably, whilst the Appendix shows 17 Important Views, Map 7 Important Views in the plan only shows 13, and these are not provided with a number and title for ease of identification.</p>
	Babergh DC	<p>Thirteen 'important views' are shown on Map 7 and on the Policy Inset Maps (pages 42 - 43). They are not numbered and are not otherwise described within the Plan. This should be addressed.</p> <p>Before making a final decision on this matter, we would also want to see the Parish Council publish more coherent information as to why these views were chosen. The viewpoints themselves do not relate easily to those illustrated in the 'Landscape Character Appraisal Appendix A Views' document (the indicated reference source), but seven of them do seem to relate well to the key views illustrated in our 'Heritage and Settlement Sensitivity Assessment (2018)'</p>
<p><b>Parish Council response</b></p> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• The draft plan refers to the Stour Valley Project Area Valued Landscape Assessment in error and it should refer to Appendix 1 of the Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment Final Report - March 2018</li> <li>• Map 7 will be amended to identify the document where the views are identified.</li> </ul>		
<b>Proposed changes to Plan</b>		

Name	Organisation	Comment
<ul style="list-style-type: none"> <li>Amend the reference to Landscape <i>and</i> Visual Impact <i>Assessment</i></li> <li>Amend paragraph 9.12 to Appendix 1 of the Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment Final Report - March 2018</li> </ul>		
<b>Policy GLEM9 - Biodiversity</b>		
R Newman		New planting of trees and hedges vitally important.
M Crowley		The JLP takes into account not reversing the national decline of farmland birds B101 - Biodiversity Criteria. Land south of Kings Road, West of Park Lane will not protect or enhance the features and areas of the geological value in the rural area.
N Vyse		I support biodiversity. I think you cannot tear up established nature and just replace. Things are always best left in situ.
L Crofton		Policy GLEM9 reflects the UK Governments legislation regarding biodiversity net gain, the legislation requirement is for "at least 10% net gain" could this be added to the policy Glem9 as it can only strengthen the policy. Everything else I agree with.
	Suffolk Wildlife Trust	<p>Suffolk Wildlife Trust are happy to see that the plan references both <i>Glemsford Pits</i> and <i>Court Wood</i> Sites of Special Scientific Interest (SSSIs). We believe the plan could be strengthened by showing these on a map, alongside other sites of nature conservation value, such as <i>Lumpit Wood</i> County Wildlife Site (CWS), and the range of Priority Habitats within the parish which include <i>coastal floodplain &amp; grazing marsh</i>, <i>deciduous woodland</i>, and <i>lowland heathland</i>. These habitats are primarily focused around <i>Glemsford Pits</i> SSSI along the River Stour, however areas of priority habitat do lie within the centre and north of Glemsford. The parish also supports many hedgerows which provide landscape connectivity and are a priority habitat.</p> <p>The results of the village survey show the importance of protecting greenspace in the area, notably the value of hedgerows and woodland. The policy, <i>GLEM9 Biodiversity</i>, puts forward that proposals should protect these features, extending this to include ponds; Suffolk Wildlife Trust put that this should be extended to include all priority habitats.</p>

Name	Organisation	Comment
		<p>We support that planning permission should be refused if suitable mitigation and compensation cannot be provided; this should be extended to push that enhancement must be provided, in line with the National Planning Policy Framework Paragraph 174d and 180d.</p> <p>The wording of <i>Point C</i> of GLEM9 could be re-worded to emphasise that including bat boxes and swift boxes (alongside other bird boxes such as starling or house sparrow boxes) provide suitable compensation or enhancement of nesting features but do not directly improve fragmented biodiversity networks. Suffolk Wildlife Trust fully support Glemsford Parish Council in seeking to restore and repair biodiversity networks, and strongly support the wording noting the value of native trees and local provenance. Wording could be adapted to include that as well as planting, the creation of habitats using natural regeneration is also promoted within the parish.</p> <p>We believe that delivery of improved networks can be better achieved through the following two points:</p> <ul style="list-style-type: none"> <li>Existing ecological networks, such as the River Stour valley, could be mapped and included within the draft Neighbourhood Plan. Potential stepping stone habitat could also be included. Mapping these features will allow for any habitat creation within the parish to be targeted in improving this network through extending and buffering the existing sites within the network or connecting these sites either directly or by creating stepping stone habitat.</li> <li>Glemsford could push for an increased amount of habitat creation in line with the above by including an aspiration for new development within the parish to deliver a minimum net gain of 20%. Biodiversity Net Gain is referenced within the draft plan alongside the national requirement for a minimum net gain of 10%; this will become mandatory on many development sites in January 2024. However, newly published guidance on Biodiversity Net Gain clearly states, "Plan-makers may seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development. ..."1 going on to state that such a policy would need to be evidenced. Suffolk Wildlife Trust put forward that this evidence lies within the public response to the value of the natural world in Glemsford, the worrying downward trend in UK wildlife2, and evidence in the viability of a 20% net gain policy being deliverable put forward further within this response.</li> </ul> <p><i>Additional Information Advocating a 20% Biodiversity Net Gain for Glemsford</i></p>



Name	Organisation	Comment
		<p>The new Environment Act 2021 requires development proposals to achieve a minimum 10% net gain in biodiversity; whilst not yet required in law, this level is already being implemented as good practice across the country and is well referenced within the plan which includes reference to this national minimum level, which will be required on most developments from early 2024.</p> <p>The Wildlife Trusts, as well as other organisations, are advocating for a minimum 20% Biodiversity Net Gain where this is possible. Suffolk Wildlife Trust offer our support to Glemsford Parish Council should they include an aspiration for achieving a higher percentage of net gain, helping to ensure that the biodiversity assets of Glemsford are conserved and enhanced for future generations. Suffolk County Council's recent commitment to 'deliver a further 10% biodiversity net gain in aggregate across the housing programme, in addition to the 10% biodiversity net gain that will be required on each site.'<sup>3</sup>, show that it is reasonable to include this aspiration within the Glemsford Neighbourhood Plan.</p> <p>There are further examples of district councils outside of Suffolk requiring more ambitious BNG requirements within their Local Plans and these have been evidenced with viability studies. For example, Swale Borough Council completed a viability study and found that doubling the percentage of biodiversity net gain from 10% to 20% increased the cost of delivery by just 19%, so then included a minimum 20% BNG requirement in their local plan<sup>4</sup>. The Greater Cambridge Draft Local Plan also includes a requirement for a minimum 20% BNG<sup>5</sup>. We reiterate, Policy GLEM9 could, we believe, be strengthened in its delivery for wildlife, by including reference to a level of net gain above the current national minimum. Delivering 20% BNG ensures there is more confidence that a significant and meaningful uplift in biodiversity will be achieved, which will help protect the high-quality biodiversity assets and ecological networks within and surrounding Glemsford.</p>
	Suffolk County Council	<p>Policy GLEM9 incorporates the mitigation hierarchy, including compensation, which is welcome.</p> <p>SCC has some concerns regarding the mention of bird and bat boxes in the same vein as habitat creation listed in parts a and b. Bird and bat boxes are not considered habitat creation and therefore could enable developers to underdeliver mitigation.</p>

Name	Organisation	Comment
		<p>With regards to the biodiversity improvement measures listed, SCC has some concerns regarding the mention of swift and bat boxes in the same vein as habitat creation listed. Losing the connectivity of one or several hedgerows will not be repaired with the installation of bat or bird boxes. Swift and bat boxes are not considered habitat creation, and therefore could enable developers to underdeliver mitigation. SCC would recommend removing the examples, as below, as there is a wider scope for measures without them. "Otherwise acceptable development proposals will be supported where they provide a net gain in biodiversity through, for example:</p> <ul style="list-style-type: none"> <li>a. <u>restoring and repairing fragmented wildlife networks and</u> the creation of new natural habitats including ponds;</li> <li>b. the planting of additional native trees and hedgerows of local provenance and;</li> <li>c. <del>restoring and repairing fragmented wildlife networks, for example, including swift boxes, bat boxes and holes in fences which allow access for hedgehogs.</del>"</li> </ul>
	Babergh DC	<p>Para 9.1 mentions the two SSSI sites located within the parish, but it could go further by also mentioning Lumpit Wood, a County Wildlife Site close to and north-east of Court Wood SSSI. Both are part of the much wider Natural England Network Expansion Zone (shown below in the extract from DEFRA's MAGIC Maps tool). This gives it some importance in the parish.</p> <p>Both woods are close to the proposed housing allocation and, while GLEM 3 specifies that the allocated site will be required to provide recreational [public] open space - <i>which we strongly support</i> - some offsite biodiversity net gain provision may also be required. An opportunity therefore presents itself through habitat creation within the network expansion zone. Of course, this would also be dependent upon the landowner offering space for this to happen.</p>

Name	Organisation	Comment
		<div data-bbox="607 142 1440 751" data-label="Image"> </div> <p data-bbox="607 751 1749 791">DEFRA MAGIC Map extract showing the Natural England Network Expansion Zone.</p> <p data-bbox="607 839 2107 1134">At present, the last part of GLEM 9 only refers to the desire to create new habitats, plant native trees and hedging, and restore connectivity, but it is silent on how this should happen. Including a reference to the network Expansion Zone within the Plan offers a means of focussing developers' attention on where best to make a difference. This Plan could, for example, state that <i>'support would be provided for off-site Biodiversity Net Gain (BNG) where it offers a means of restoring fragmented biodiversity networks within the network enhancement zone.'</i> Such support would also be more beneficial than just requiring developers to instal swift boxes etc., although the latter all still have their place.</p> <p data-bbox="607 1182 2063 1342">A parish wide biodiversity audit would also be another useful addition to the supporting evidence base and could help identify what the parish has of value other than just within the two SSSI sites. The audit could include ponds, streams, hedgerows, woodlands, meadows and so on. Having such an assessment would:</p> <ul data-bbox="607 1350 2107 1430" style="list-style-type: none"> <li>• Help identify sensitive and valuable sites, so protecting them from future development, degradation, or removal.</li> </ul>

Name	Organisation	Comment
		<ul style="list-style-type: none"> <li>Identify condition, so that enhancement work could be focussed on sites most at need.</li> <li>Build a better picture of the parish ecological networks and identify gaps, and</li> <li>Highlight where offsite BNG delivery would be most strategically valuable. Though the network enhancement zone area is arguably the most important, that opportunity may not arise. The more areas that are identified, the more chance there is that one or more could be available.</li> </ul> <p>We also realise that producing such an audit at this stage will be difficult, but as a minimum your Plan could set out an 'action' to prepare and deliver such an audit in association with other relevant organisations.</p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>Since the Plan was consulted on the Environment Act requiring a minimum 10% biodiversity net gain has been implemented and the Plan will be updated accordingly</li> <li>Reference will be included in the Plan to the County Wildlife Sites but mapped details of the extent of the site are not made freely available.</li> <li>No evidence is provided to demonstrate the viability of increasing the minimum BNG requirement to 20% and so, while this aspiration is to be applauded, this cannot be required in the Plan.</li> <li>The policy will be amended taking account of the comments made by Suffolk CC</li> <li>It is not considered necessary to carry out a parish wide biodiversity audit in order to meet the Basic Conditions</li> <li>Babergh DC's reference to off-site BNG is noted but it would be hoped that on-site provision should be made and that there is no need to make such references in the Plan.</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Amend the policy to include encouragement to the installation of swift-bricks, bat boxes and hedgehog holes in addition to the statutory BNG requirements</li> </ul>		
<b>Policy GLEM10 – Local Green Spaces</b>		
I Homer		Although I don't deem there to be enough green spaces in Glemsford.
Anonymous		Because there wont be any left at this rate!



Name	Organisation	Comment
Anonymous		Because there wont be any left at this rate!
R Newman		Important to keep and maintain existing green spaces
L Crofton		I appreciate the desire to protect local green spaces Policy GLEM10, however I feel there is still scope to enhance the policy to further protect our local natural green spaces and the wider environment.
	Anglian Water	Anglian Water notes the proposed local green spaces and we agree the policy provides scope for Anglian Water to undertake operational development to maintain and repair any underground network assets that may be within these areas, such as mains water and sewer pipes, which would be consistent with national Green Belt policy.
	Suffolk Wildlife Trusts	Policy GLEM10 highlights the ecological benefits of greenspace; Suffolk Wildlife Trust support this and note that in addition to direct biodiversity benefits, greenspace and access to it offers the chance for individuals to access nature and the benefits that it has on physical and mental health.
	Suffolk County Council	<p>SCC welcomes the designation of the ten Local Green Spaces, as shown on Village Centre Inset Maps (North and South), and the reference to the NPPF December 2023 paragraph 106 - as this supports the ongoing work to make Suffolk the Greenest County.<sup>8</sup></p> <p>The Local Green Space Assessment provides clear evidence through maps and descriptions, including sizes of the sites, however, SCC notes that it does not provide photographs. Overall SCC consider that all sites proposed for Local Green Spaces designation fulfil the NPPF December 2023 criteria.</p>
	Babergh DC	<p>All the proposed Local Green Spaces appear to meet the NPPF criteria. Looking at the Appraisal:</p> <ul style="list-style-type: none"> <li>On the LGS 4 Map, the Church should not be shown as part of the designated area. The same should apply to the Village Centre Inset Map (North) on page 42 of the Plan.</li> <li>Re LGS 5, the assessment states that the whole area is covered by a Tree Preservation Order (TPO). Our records<sup>2</sup> suggest otherwise, but they do show that our Public Realm team undertake various on-site contracts, including grass cutting and maintenance of the trees and some hedgerows. Please check your information sources and amend the Appraisal, as necessary.</li> </ul>

Name	Organisation	Comment
<b>Parish Council response</b>		
<ul style="list-style-type: none"> <li>The comments are noted</li> <li>The Policy only designates sites that accord with the NPPF definition. Additional landscapes are covered in other policies in the Local and Neighbourhood Plan.</li> <li>The maps relating to the churchyard will be amended to exclude the church building</li> <li>The LGS Assessment will be amended to delete reference to TPOs in LGS5</li> </ul>		
<b>Proposed changes to Plan</b>		
<ul style="list-style-type: none"> <li>Amend the Village Centre Inset Map to exclude the church building from LGS4 and likewise in the Local Green Space Assessment</li> <li>Amend the Local Green Space Assessment to delete reference to TPOs in LGS5</li> </ul>		
<b>Chapter 9 - Natural Environment comments</b>		
M Crowley		Bats and other wildlife are present on the land south of Kings Road, West of Park Lane. The geological value of this rural area warrants protection. The JLP supports not developing on agricultural land and wishes to strengthen the approach to ensure these natural assets are not lost or compromised. This involves prioritisation of using brownfield site.
N Vyse		A full study of the local biodiversity that could be effected should be conducted and an independent impact survey.
L Crofton		The recognition of important natural/wildlife habitats at Plan paragraph 9.1 and bearing in mind the National Planning Policy Framework paragraph 174 d) which refers to coherent ecological networks, The Plan could be enhanced by mapping the connectivity between both recreational and natural green spaces. Connectivity between green spaces is essential for effective foraging, nesting and movement corridors. The corridors can be footpaths with hedgerows, quiet road/green lane routes with hedgerows and grass verges. It is suggested that by enhancing the Plan with mapped connecting green routes will strengthen their protection by embedding the map within the appropriate Natural Environment Policy GLEM7-10 or by adding a further bespoke policy. Such a mapping exercise will also highlight where connectivity does not currently exist and identify where action might be considered. It should also highlight how the connections interact with open green spaces such as the Glem and Stour valleys and other green

Name	Organisation	Comment
		landscapes. A key aspect of this would be enhanced health and well-being opportunities for local residents to enjoy safe routes to green spaces." This feels like a win win addition to the policy.
L Pearce		LEAVE IT ALONE
	Suffolk County Council	<p>This section could be strengthened to better support the Vision and Objectives 5 and 6.</p> <p>Paragraph 9.15 will need to be updated, as the Environment Act is an Act of Parliament, and is expected to become fully enacted in January 2024.</p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>Paragraph 9.15 will be updated to reflect the implementation of the Environment Act</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Amend paragraph 9.15 to reflect the implementation of the Environment Act</li> </ul>		
<b>Policy GLEM11 – Development Design</b>		
R Newman		Agree
M Crowley		Drainage and Flooding are already a problem with pathways bursting leaks along Kings Road.
N Vyse		All the reasons stated above.
A Good		Pleased to see it.
L Pearce		Any more development contradicts all the main objectives thus rendering the policy void
C Mills	Savills UK Ltd on behalf of Rainier Developments	<p>The majority of design principles are supported. However, two requirements would benefit from minor modification, as follows:</p> <p>h) identifies that all parking should be provided within the plot. However, it is considered important to recognise the need for visitor parking and to ensure consistency with other policies the Neighbourhood Plan. For instance, paragraph 6.22 relating to draft allocation GLEM3 identifies 'There is scope for some component of on-street parking to accommodate visitors parking'. It is suggested that this flexibility and acknowledgement should also be incorporated within policy GLEM11</p>

Name	Organisation	Comment
		<p>n) states that one electric vehicle charging point should be provided for every new off-street residential parking place. This requirement is not considered proportionate nor is it consistent with the requirements of Building Regulations Approved Document S. We would therefore suggest that the Neighbourhood Plan could instead simply cross reference the requirement to comply with the Building Regulations requirement that is applicable at the time, which sets out when and where charge points or cable facilities for charge points are required.</p>
	Anglian Water	<p><b>Water Efficiency [Policies GLEM3 and GLEM11]</b></p> <p>As a region identified as seriously water stressed we encourage plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through rainwater/storm water harvesting and reuse, and greywater recycling. Our revised draft water resources management plan for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies.</p> <p>We recognise that the Babergh and Mid Suffolk Joint Local Plan Part 1 Policy LP23 requires all residential development to meet the higher water efficiency standards of 110 litres/person/day (l/p/d), but encourage developments to achieve water usage of 100 l/p/d - incorporating water re-use and recycling, rainwater and stormwater harvesting and other suitable measures.</p> <p>The Defra <a href="#">Integrated Plan for Water</a> supports the need to improve water efficiency and the Government's <a href="#">Environment Improvement Plan</a> sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. The <a href="#">Written Ministerial Statement</a> issued by the Secretary of State for Levelling Up Housing and Communities on 19<sup>th</sup> December 2023 highlighted the issue of water scarcity, particularly for locations such as Cambridge and areas of serious water stress (including the whole of the Anglian Water region) and indicated that further consideration would be given to building regulations to enable local planning authorities to introduce tighter water efficiency measures.</p>

Name	Organisation	Comment
		<p>The Glemsford Design Guidance and Codes - code DC10 Sustainable Homes references water management, more ambitious water efficiency standards, and the use of sustainable drainage systems to facilitate individual property and community scale rainwater harvesting systems.</p> <p>Given the proposed national and Local Plan approach to water efficiency, Anglian Water would encourage a water efficiency standard of 100 l/p/d to be included in the neighbourhood plan as a general requirement for new residential development design standards (Policy GLEM11 Development Design) and/or as a requirement in Policy GLEM3 Land West of Park Lane.</p> <p>SCC suggest the addition of a new part to Policy GLEM11:  <u>"o. Integrate energy efficient technologies such as photovoltaic and heat pumps."</u></p>
	Suffolk County Council	<p>SCC considers that the plan should include reference to Suffolk Design: Streets Guide<sup>10</sup> and Suffolk Guidance for Parking (2023)<sup>11</sup> throughout and within relevant policies, in particular Policy GLEM11.</p> <p>SCC notes that parts g) and i) should reference and accord with Suffolk Design: Streets Guide (2022); parts h), k), and n) should reference and accord with Suffolk Guidance for Parking (2023).</p>
	Babergh DC	<p>Policy GLEM 11 (Development Design) replicates similar design policies in other adopted neighbourhood plans. There is nothing wrong with this per se, but JLP Policy LP24 (Design &amp; Residential Amenity) does now provide guidance at the district level on a broad range of design principles. Opportunities may therefore exist to avoid unnecessary repetition within GLEM 11 and to make what remains more relevant / focused on design matters that are unique to Glemsford.</p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• The Plan cannot put a block on all future development and so needs to make appropriate provision for it.</li> <li>• The Plan will be amended to bring consistency in terms of on-street visitor parking</li> <li>• The Building Regulations are not relevant to the consideration of planning applications and, in relation to vehicle charging points, it is appropriate to future proof development by requiring extra provision</li> <li>• An additional criterion will be added to address energy efficiency</li> </ul>		



Name	Organisation	Comment
<ul style="list-style-type: none"> <li>It is considered that the policy detail appropriately reflects the character and distinctiveness of Glemsford and that there is no duplicity with Policy LP24 of the adopted JLP Part 1.</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Add an additional criterion to the Policy to encourage the incorporation of current best practice in sustainable design and construction measures and renewable energy measures, such as, where feasible, ground/air source heat pumps, solar panels, thermal and PV systems</li> </ul>		
<b>Policy GLEM12 – Artificial Lighting</b>		
A Fanning		During the winter months all areas should be artificially lit until 10.30pm
R Newman		Light pollution must be kept to a minimum without compromising public safety
	Suffolk Wildlife Trust	<p>Suffolk Wildlife Trust support GLEM12 in ensuring that future lighting systems should have minimum impact on the environment. Nocturnal wildlife, such as bats, can be highly impacted by external lighting changes which can affect roosting, foraging, and commuting habitat.</p> <p>When in doubt, newly proposed external lighting should be reviewed by a suitably experienced ecologist to ensure that proposals do not have an adverse effect on nocturnal wildlife.</p>
	Suffolk County Council	Any new flood lighting or other light sources that could impact upon the highway need to be assessed by the Highway Authority (as part of the planning consultation process). SCC street lighting team do not usually allow lighting over 1 lux onto the highway or any other lighting that may impact upon road users.
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>None</li> </ul>		
<b>Chapter 10 - Built and Historic Environment comments</b>		

Name	Organisation	Comment
M Crowley		The land south of Kings Road, West of Park Lane is in the Flood Zone.
A Good		Would like to see non heritage assets listed so that future PC's remember that they are important ie the village sign on Tye Green, the village sign in Brook Street which reflects it's historical juxtaposition with the village (as seen on OS maps) and the telephone Kiosk. Whilst this is not a requirement of the plan, I think they can and should be added.
L Pearce		i think i have made my position clear, see my other comment's
	Suffolk County Council	<p>The reference to SCCAS and the Suffolk HER in paragraph 10.1 is supported, as well as the paragraph encouraging early consultation when preparing a planning application. SCC welcomes that archaeology has been included as a consideration in Policy GLEM11 (Development Design). Section 10 and Policy GLEM11 could benefit by also recommending that a Heritage Statement is prepared where proposals involve designated and non-designated heritage assets.</p> <p>SCC welcomes the inclusion of a list of the Listed Buildings in Appendix 2 within the neighbourhood plan area. In addition, it would be beneficial to include a list of any structures considered to be non-designated heritage assets which have been identified and to also identify any which could be suitable for listing. SCC Archaeological Service have been reviewing Farmsteads throughout Suffolk, as part of an ongoing project funded by Historic England. The Neighbourhood Planning group may wish to consider whether the information from the Suffolk Farmsteads Project would add any details or information to the Non-Designated Heritage Assets within the area, entries from the project can be seen via the Suffolk Heritage Explorer.<sup>1</sup></p> <p>SCC would highlight that whilst paragraph 10.10 mentions fluvial flood risk to the parish, it does not mention groundwater flood risk. SCC suggests the text is amended as follows:  "10.10 The elevated position of the main built-up area of the village is such that flooding from rivers and watercourses is not a problem for the area. However, it is a very different situation in the vicinity of the River Stour and the River Glem, which are in Flood Zone 3 where there is a high probability of flooding resulting from the watercourses overflowing. There are some areas in the village that are also susceptible to surface water <u>flooding and groundwater</u> flooding, <u>particularly during events of</u> resulting from heavy or persistent rain."</p>

Name	Organisation	Comment
		<p>SCC welcomes paragraph 10.11 and would note that this paragraph could be strengthened by referring to NPPF December 2023 paragraph 165 regarding site selection.</p> <p>The following minor amendments are suggested to paragraph 10.11:            "10.11 New developments in Glemsford must be designed to not increase the risk of surface water flooding, <u>either on the development site or elsewhere in the village</u>. As such, proposals will be required, <del>where appropriate</del>, to make provision for the management of surface water run-off. The use of Sustainable Drainage Systems (SuDS) will be necessary on larger developments and supported on smaller schemes in accordance with the guidance published by Suffolk County Council, the Lead Local Flood Authority, <u>and should provide multifunctional benefits such as amenity and biodiversity</u>. Part 1 [...]"</p> <p>Paragraph 10.9 states "The Design Codes are reproduced in Appendix X of the Plan", and this should be updated accordingly.</p>
	Babergh DC	<p>We have no substantive comments to make on this chapter but please note the following:</p> <ul style="list-style-type: none"> <li>• Para 10.1 should refer to Appendix 2 (not Appendix X)</li> <li>• In the last sentence of para 10.9, this should refer to Appendix 3 (not Appendix X), and there is no Appendix 4 in the Plan.</li> <li>• Also in para 10.9, we suggest that you refer to the AECOM document by its full title (Glemsford Design Guidance and Codes - September 2021).</li> </ul>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• The Environment Agency records do not show the allocated site to be in a flood zone</li> <li>• Identification of non-designated heritage assets would only protect features when planning consent is required. The removal of a village sign would not require planning consent.</li> <li>• The Parish Council does not wish to include the information from the Suffolk Farmsteads Project. The Plan refers users to the Historic Environment Record which will provide up-to-date information rather than the Plan containing information at a "point-in-time".</li> <li>• Paragraphs 10.10 and 10.11 will be amended as suggested by the County Council.</li> <li>• The corrections identified by Babergh DC will be made.</li> </ul>		

Name	Organisation	Comment
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Make amendments as identified by Suffolk CC and Babergh DC</li> </ul>		
<b>Chapter 11 - Services and Facilities comments</b>		
J Aldous		New surgery Poss new school
I Homer		These facilities are already stretched to capacity.
R Newman		To ensure that with a growing population that policing is increased to ensure public confidence. To make sure that the doctors surgery is capable to handle increased demand that must arise. To try to minimise road closures that impact on increased traffic flow through other parts of the village. Parking on green spaces must be prevented in order to give visitors the right impression on entering the village.
M Crowley		Schools and the Doctors Surgeries are overcrowded and the current infrastructure is challenging. Hobbs Lane is adequate already and will not withstand further vehicle journeys and traffic.
	Suffolk County Council	<p>Libraries SCC welcome that the library is considered as one of the most important facilities in the village, as noted in paragraph 11.3.</p> <p>For information, Glemsford library is currently being run from a shop premises where there is no option to extend the building, and therefore investment would be required to reconfigure the space to increase usable floorspace. Further consideration of a move of premises in the longer term is continually reviewed to meet the needs of the existing and growing community.</p> <p>SCC would therefore support specific mention of library services in this neighbourhood plan in chapter 11, including notification of the expectation for new developments coming forward in Glemsford to make contributions to library provision.</p>

Name	Organisation	Comment
		Underneath paragraph 11.9, SCC suggests that it would be helpful if the photograph would include a caption, as the implication is that it is The Angel Public House which is not correct.
	Babergh DC	<ul style="list-style-type: none"> <li>• In para 11.1, replace '<i>following</i>' with '<i><u>followed</u> by the UK economic downturn ...</i>'</li> <li>• In the first line of para 11.5, delete the words '<i>as proposed to be modified following examination</i>'</li> <li>• In the quoted LP28 text <ul style="list-style-type: none"> <li>• amend 1.c. to read: '<i>All development should be of have a high-quality development <u>have a high standard of design and sympathetic to ... [etc]</u></i>'</li> <li>• In 2.a., remove the comma between '<i>... will be, provided ...</i>'</li> </ul> </li> </ul>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>• The comments are noted</li> <li>• The County Education Department has indicated that, based on a development of 100 dwellings, there would be a need for 25 primary pupil places based on current estimated pupil yield calculations. Based on the current forecasts, an additional 25 pupils could be accommodated at the school if development came forward at the end of the five-year forecast period (2027/28).</li> <li>• The NHS were consulted on the Plan but did not respond.</li> <li>• Babergh DC operate the Community Infrastructure Levy and it is understood that financial contributions towards facilities such as the library should come from that Levy.</li> <li>• It is not considered that the photograph under 11.9 (the village hall) could be confused for the Angel PH</li> <li>• The amendments suggested by Babergh DC will be made</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>• Make amendments as identified by Babergh DC</li> </ul>		
<b>Policy GLEM13 – Public Rights of Way</b>		
R Newman		All public rights of way must be kept and maintained at the present level.
M Crowley		Rights of Way and Highway Legislation dates back to the 16th Century and should be protected and maintained for future generations to enjoy.



Name	Organisation	Comment
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	<p>Land west of Duffs Hill provides an opportunity to improve and extend the existing network of public rights of way across the north of Glemsford. Through an appropriate design, the land could provide significant enhancements to the existing public rights of way and include additional routes and connectivity for users within Glemsford and the surrounding area.</p> <p>Bloor Homes are committed to working alongside the Parish Council and local residents in order to maximise the wider benefits the land could provide to Glemsford.</p>
	Suffolk Wildlife Trust	Suffolk Wildlife Trust support the policy in seeking to improve and extend the network of footpaths and bridleways in the parish, notably as their value as biodiversity corridors. As per our comments regarding GLEM9 – Biodiversity we put that including an aspiration to deliver 20% Biodiversity Net Gain within the Neighbourhood Plan will further improve the chances of delivering improvements to the biodiversity value of public rights of way in the parish.
	Suffolk County Council	<p>As currently worded, Policy GLEM13 (Public Rights of Way) conflates two important aspects: improving the Public Rights of Way (PROW) network; and creating biodiversity corridors.</p> <p>The primary function of the PROW network is to provide opportunities to access the countryside, and therefore the policy should focus on improvements that enable easier access into that countryside. While improvements to the PROW network can also provide benefits to wildlife and biodiversity, improvements to the network should not be conditional on biodiversity.</p> <p>In the case of hedgerow corridors, these can be detrimental to the PROW network if allowed to overshadow the path, restrict air movement, prevent direct sunlight, and thereby discourage or even prevent year-round use. Instead, SCC suggests that the policy is amended, as follows:  “Measures to improve and extend the existing network of public rights of way and bridleways will be supported where improvements are not <u>detrimental</u> to biodiversity, <del>their value as biodiversity corridors is safeguarded</del> and any public right of way extension is fit for purpose. Where practicable development proposals should incorporate measures to enhance biodiversity within the improved or extended public right of way.”</p>
<b>Parish Council response</b>		

Name	Organisation	Comment
<ul style="list-style-type: none"> <li>The comments are noted</li> <li>The Plan does not propose the loss of public rights of way but seeks their enhancement</li> <li>The Parish Council believes that public rights of way can also provide biodiversity corridors and, as such, the wording is appropriate.</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>None</li> </ul>		
<b>Chapter 12 - Travel comments</b>		
R Plant		Bus service is out of date and roads leading up to houses or new homes needs updated as they will be lot of trucks delivering to new site and Hobbs lane is not fit for 2023 let alone 2033
A Fanning		The village has substantial grown over the last 40 years increasing the amount of traffic significantly. There are so many vehicles parked along the main village road resulting in Park Lane and Hobbs Lane becoming the main road for the majority of vehicular traffic. The road is not even to a "B road" standard and I believe now is the time to bring the road up to an acceptable standard fit for purpose. All too often new homes are built with no infrastructure.
M Crowley		Glemsford is around 7 miles from Sudbury and residents accept that primarily they need to travel out of Glemsford to the surrounding larger towns for work.
	Suffolk County Council	<p>It is suggested the Policy Context section in Chapter 12 could be enhanced by adding a new paragraph following paragraph 12.5, as suggested below:</p> <p><u>12.6. It is important to improve air quality and mitigate any risk to human health due to man-made emissions such as nitrogen oxides and particulate matter. Encouraging and facilitating active and sustainable travel can reduce vehicles on the road and therefore pollution and poor air quality, as well as improve mental and physical health.</u></p> <p><i>Green Access Strategy</i></p> <p>There could be reference to other strategies that support this Neighbourhood Plan. This includes Suffolk County Council's Green Access Strategy (2020-2030).<sup>9</sup> This strategy sets out the Council's commitment to enhance PROW, including new linkages and upgrading routes where there is a need. The strategy also</p>

Name	Organisation	Comment
		<p>seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.</p> <p>It is suggested that paragraph 12.1 could make reference to the Local Cycling and Walking Infrastructure Plan (LCWIP)12 plus LTN1/2013 with regard to good design.</p>
	Babergh DC	<p>We have no comments to make on this chapter but please note the following:</p> <ul style="list-style-type: none"> <li>In para 12.5, delete the text marked in red in the second sentence: <i>'Policy LP29 of the <del>emerging</del> Joint Local Plan, as proposed to be modified following examination, sets out a number of criteria against which development will be assessed in terms of traffic impact and improvements to travel.'</i></li> </ul> <p>Our Sustainable Travel Officer also suggests that you might want to add a reference to the Enhanced Partnership for Bus Travel within the supporting text. She suggests this could be incorporated into a re-worked version of para 12.6, as follows:</p> <p><i>12.6 Because most road improvements can take place within the highway, they do not require planning permission and, as such, the neighbourhood plan is not an appropriate place to contain policies for their improvement. However, although the Parish Council cannot deliver highway improvements, it does have a lobbying role in delivering such measures. Likewise, the provision of bus services is a decision made outside the planning system, <u>but the Parish Council can advocate for the needs of Glemsford within the Suffolk Enhanced Partnership Passenger group.</u></i></p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>The additional paragraph suggested by the County Council will be added. However, it is not considered necessary to add references to the strategies suggested.</li> <li>The suggested amendments to the current paragraphs 12.5 and 12.6 by Babergh DC will be made.</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Amend paragraphs 12.5 and 12.6 as suggested and add additional paragraph suggested by Suffolk CC.</li> </ul>		

Name	Organisation	Comment
<b>Policies Map and Inset Maps comments</b>		
M Crowley		I don't agree with the site land south of Kings Road, West of Park Lane.
N Vyse		I do not think the land behind Chequers is suitable for development.
L Pearce		NO MORE HOUSES.
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	<p>While Bloor Homes recognise the need for a policies map, for reasons set out within this neighbourhood plan consultation response, Bloor Homes are of the opinion the parish council should reconsider the residential site allocation and settlement boundary.</p> <p>While GLEM3 is allocated for up to 100 dwellings, the developer is actively promoting the land for up to 230 dwellings. The allocation in its current form does not meet the requirements of the NPPF and results in an inefficient use of land for residential uses. Moreover, it is likely the allocation will result in significant pressure being applied to the Parish Council and Local Planning Authority to deliver a far higher density development than initially envisaged or required in Glemsford. Bloor Homes would support the policies map being reconsidered and alternative land being considered for residential uses which could deliver significant benefits and not result in the loss of greenfield land in a highly visible and accessible area of Glemsford.</p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>None</li> </ul>		
<b>Appendices comments</b>		
A Good		Only to repeat that in my opinion the sites 1 and 2, whilst not selected, would be inappropriate for any limited development
A Fisher	Stantec (on behalf of Bloor Homes (Eastern))	<p>Appendix 1 - Housing Site Selection - Site 2: Land west of Duffs Hill</p> <p>Bloor Homes recognises the importance of a site selection process to shape, direct and deliver sustainable development within the neighbourhood plan area.</p>

Name	Organisation	Comment
		As set out within this consultation response form, Bloor Homes have an option on land west of Duffs Hill, which extends beyond the red line boundary included within the Neighbourhood Plan. The SHLAA (October 2020) demonstrates the land is considered suitable for residential development. The land could deliver a sustainable residential scheme within the limits of 51 to 100 additional homes as supported in the village survey. The land provides a suitable site for residential development and should be considered further for allocation within the Neighbourhood Plan.
	Babergh DC	<p>Please also note that, in <b>Appendix 3</b> under the 'Building heights and roofline' sub-heading, there appears to be a carriage-return after the word 'massing' in the second bullet point that needs to be deleted, i.e., it should read: '<i>... height, form, massing, and scale.</i>'</p> <p><b>Appendix 2</b></p> <p>For context, we suggest that may wish to add the following sentence (or similar) under the heading: <i>The information in this appendix is correct at the time of writing the Plan. An up to date record of all listed heritage assets should always be sought from Historic England or other reliable sources of information.</i></p> <p>There also appears to be a formatting (indent) issue with the 'Grade II' list.</p>
<b>Parish Council response</b> <ul style="list-style-type: none"> <li>The comments are noted</li> <li>The suggested amendments by Babergh DC will be made.</li> </ul>		
<b>Proposed changes to Plan</b> <ul style="list-style-type: none"> <li>Amend Appendix 2 and 3 as suggested by Babergh DC</li> </ul>		
<b>General comments – Parish Council response follows each comment</b>		
Anonymous		I do not think the village can sustain anymore houses.
Noted		



Name	Organisation	Comment
M Crowley		The Parish Council is in office to serve local people as the first tier and grass-roots level of local government. It would be good if Councillors could please listen to and represent the strong feeling of residents.
A Good		I think that the PC needs to give further coverage to what the NP is. Facebook is full of opinion that the PC is advancing the case for more development as distinct from responding to what the majority of people have said in previous consultations. It would be a travesty if the referendum was lost because of a lack of understanding.
Every household received a leaflet explaining what the Neighbourhood Plan is, what the main proposals of the Plan are and how to comment on the Plan		
L Pearce		What a waste of time money and effort that must have gone into all this
Had the Parish Council not prepared the neighbourhood Plan then it is very likely that Babergh District Council would decide where the development would go when they produce their Local Plan and it would not contain development guidelines as contained in the Neighbourhood Plan.		
C Mills	Savills UK Ltd on behalf of Rainier Developments	Rainier Developments would like to take this opportunity to reiterate their support for the allocation of the land to the west of Park Lane and identified as draft policy GLEM3, as well as their commitment to the delivery of the site. Rainier Developments would also like to reiterate their offer to meet with the Parish Council to discuss the next iteration of the emerging Neighbourhood Plan and any alterations that may be made to the draft policies as currently written. Whilst suggested modifications are included as part of these representations, Rainier Developments would be happy to meet to discuss these suggestions in more detail.
Noted. It is not considered necessary to discuss the Plan given the differences in what the Plan proposes and Rainer Developments are proposing		
L Cunliffe		I hope I'm in time to comment on the Neighbourhood Plan which was circulated in November together with the exhibition. I did express my views to some members of the Parish Council at the exhibition but I know that sometimes it is better to put things in writing. I'm sorry I've taken so long!

Name	Organisation	Comment
		<p>First of all, well done to all of the PC who persevered and worked hard to push ahead with the Neighbourhood Plan despite all the hurdles, including Covid, which have delayed progress. The end result looks excellent and in my view, the first choice of site for any further development is the most sensible and appropriate.</p> <p>Hopefully the final stages will prove rather more straightforward and speedy for you all.</p>
Noted		
Cllr J Nunn	Babergh District Council Member for Long Melford Ward	I fully support Glemsford in its endeavours to work towards a Neighbourhood Plan, And wish you all the very best with this.
Noted		
	Water Management Alliance	Thank you for your consultation on Glemsford's Draft Neighbourhood Plan. Glemsford lies outside the Internal Drainage District of the East Suffolk Water Management Board and its wider watershed catchment. Therefore, the Board has no comments to make.
Noted		
Cllr N Clarke	Councillor for Clare, Hundon & Kedington Leader of the Conservative Group West Suffolk Council	<p>Thank you for reaching out to me. My experience is as someone who was the Leader of Cambridgeshire County Council, now the Leader of the Conservative Group at West Suffolk Council and have sat on planning committees.</p> <p>My personal view is that neighbourhood plans take a huge amount of effort and sometimes money and rarely deliver anything beneficial for the area they are for.</p> <p>Neighbourhood plans do not restrict building but may attract additional building. Theoretically, they help to shape your area but in practice are usually "trumped" by some other document and some other imperative.</p>

Name	Organisation	Comment
		Sorry to be negative but ..... you need to think long and hard about this.
Our experience is very different to that suggested. We are aware of examples in the Babergh District where neighbourhood plans have been used to refuse planning applications and where the refusal as subsequently been upheld by appeal. In districts such as Babergh, where CIL is in operation, it also attracts an uplift in Community Infrastructure Levy to the Parish Council, increasing from 15% to 25% of the Parish receipt.		
	Ministry of Defence	<p>It is understood that Glemsford Parish Council are undertaking a pre-submission consultation regarding their Neighbourhood Plan draft under Regulation 14. This document will guide the future development of the parish.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.</p> <p>Paragraph 101 of the National Planning Policy Framework 2023 requires that planning policies and decisions take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.</p> <p><b>Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.</b></p> <p>The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on</p>

Name	Organisation	Comment
		<p>Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.</p> <p>The MOD have an interest within the Glemsford Parish Council Plan, in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Glemsford Parish Council Plan area of interest.</p> <p>The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.</p> <p>In addition to the safeguarding zone identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.</li> <li>• Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of</li> </ul>

Name	Organisation	Comment
		<p>installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more; and,</p> <ul style="list-style-type: none"> <li>Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft</li> </ul> <p>I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.</p>
Noted		
	Anglian Water	<p>Thank you for inviting comments on the Glemsford Neighbourhood Plan Pre-submission (Reg 14) consultation. Anglian Water is the statutory water and sewerage undertaker for the neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers sustainable development for residents and visitors to the area, and in doing so protect the environment and water resources.</p> <p>Overall we are supportive of the policy ambitions within the Neighbourhood Plan, and wish the Parish Council every success in taking this forward.</p>
Noted		
	Environment Agency	<p>Thank you for consulting us on the pre-submission plan for the Glemsford Neighbourhood Plan.</p>



Name	Organisation	Comment
		<p>For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.</p> <p>A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.</p> <p><b>Environmental Constraints</b></p> <p>We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:</p> <p><b>Flood Risk</b></p> <p>Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3 of the designated main Rivers Glem and Stour.</p> <p>On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. National Planning Policy Framework (NPPF) paragraph 167 sets this out.</p>

Name	Organisation	Comment
		<p><b>Water Resources</b></p> <p>Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.</p> <p>New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &amp;c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>).</p> <p><b>Informatives</b></p> <p>We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental</p>

Name	Organisation	Comment
		<p>information and ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning</p> <p><b>Source Protection Zones</b></p> <p>Your plan includes areas which are located on Source Protection Zones 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <a href="https://www.gov.uk/government/collections/groundwater-protection">https://www.gov.uk/government/collections/groundwater-protection</a></p>
Noted		
	Historic England	<p>Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of this Neighbourhood Plan.</p> <p>Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.</p> <p>We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time beyond the comment below. We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>.</p> <p>As your plan is including Site Allocations for housing or other land use purposes, we would recommend you review the following two guidance documents, which may be of use:</p>

Name	Organisation	Comment
		<p>HE Good Practice Advice in Planning 3 - the setting of heritage assets:  <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a></p> <p>HE Advice Note 3 - site allocations in local plans: <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans</a></p> <p>HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment :  <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a></p> <p>For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Suffolk County Council.</p> <p>To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p>
Noted		
	Avison Young on behalf of National Gas Transmission	<p>National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><b>About National Gas Transmission</b></p> <p>National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p><b>Proposed sites crossed or in close proximity to National Gas Transmission assets</b></p> <p>An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.</p>

Name	Organisation	Comment
		<p>National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Gas Transmission provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="https://www.nationalgas.com/land-and-assets/network-route-maps">https://www.nationalgas.com/land-and-assets/network-route-maps</a></li> </ul> <p>Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.</p> <p><b>Distribution Networks</b></p> <p>Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p> <p><b>Further Advice</b></p> <p>Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:</p>
Noted		
	Suffolk Wildlife Trust	<p>Thank you for sending us details of the Glemsford Neighbourhood Development Plan. We are pleased to see that the draft Glemsford Neighbourhood Plan recognises the importance of biodiversity and greenspaces and proposes measures to protect and enhance these within Policies GLEM9, GLEM10, GLEM12, and GLEM 13. We believe that these policies could be strengthened to offer an even greater benefit to biodiversity.</p>
Noted		
	Suffolk County Council	<p>Thank you for consulting Suffolk County Council (SCC) on the Pre-Submission version of the Glemsford Neighbourhood Plan.</p> <p>SCC is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:</p> <ul style="list-style-type: none"> <li>• Archaeology</li> </ul>



Name	Organisation	Comment
		<ul style="list-style-type: none"> <li>• Education</li> <li>• Fire and Rescue</li> <li>• Flooding</li> <li>• Health and Wellbeing</li> <li>• Libraries</li> <li>• Minerals and Waste</li> <li>• Natural Environment</li> <li>• Public Rights of Way</li> <li>• Transport</li> </ul> <p>This response, as with all those comments which SCC makes on emerging planning policies and allocations, will focus on matters relating to those services.</p> <p>Suffolk County Council is supportive of the vision for the Parish. In this letter, we aim to highlight potential issues and opportunities in the plan and are happy to discuss anything that is raised.</p> <p>Where amendments to the plan are suggested, added text will be in <i>italics and underlined</i> and deleted text will be in <del>strikethrough</del>.</p> <p><b>Archaeology</b>  SCC welcomes that heritage has been given significant thought and consideration in the plan.</p> <p><b>Education</b>  SCC, as the Education Authority, has the responsibility for ensuring there is sufficient provision of school places for children to be educated in the area local to them. This is achieved by accounting for existing demand and new developments. SCC, therefore, produces and annually updates a five-year forecast on school capacity. The forecast aims to reserve 5% capacity for additional demand thus the forecasting below may refer to 95% capacity. The information below is to inform the Neighbourhood Planning Group's understanding of educational provision in the Plan Area and does not need to be included in the Plan.</p>

Name	Organisation	Comment				
		<p>The catchment areas for Glemsford Parish are as follows:</p> <table><tr><td><u>Primary Catchment</u></td><td><u>Secondary Catchment</u></td></tr><tr><td>Glemsford Primary Academy</td><td>Ormiston Sudbury Academy</td></tr></table> <p>Primary Education</p> <p>Glemsford Primary Academy is not currently forecast to exceed 95% capacity during the current forecast period. If the Site Allocation within Policy GLEM3 was designated for development of 100 dwellings, SCC would expect the need for 25 primary pupil places based on current estimated pupil yield calculations. Based on the current forecasts, an additional 25 pupils could be accommodated at the school if development came forward at the end of the five-year forecast period (2027/28). However, during the development of the Babergh and Mid-Suffolk Joint Local Plan, a feasibility was completed to investigate whether the primary school could expand as, at the time, the school was forecast to be at 95% capacity.</p> <p>Secondary Education</p> <p>Ormiston Sudbury Academy is set to be rebuilt as part of the Department for Education’s School Rebuilding Programme during the next few years. The 11-16 capacity is likely to be rebuilt at 900 places (although this will be confirmed as the rebuild plans develop). On this basis, the number of pupils arising from housing completions beyond the forecast period, applications pending decision, and local plan site allocations are expected to cause the school to exceed 95% capacity based on current forecasts. The proposed strategy for mitigating this growth is via future expansion of secondary provision.</p> <p><b>Flooding</b></p> <p>SCC, as the Lead Local Flood Authority, has the responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. The Environment Agency has the responsibility for managing flood risk from main rivers and the coast.</p> <p><b>Health and Wellbeing</b></p> <p><i>Adaptable Homes and an Ageing Population</i></p>	<u>Primary Catchment</u>	<u>Secondary Catchment</u>	Glemsford Primary Academy	Ormiston Sudbury Academy
<u>Primary Catchment</u>	<u>Secondary Catchment</u>					
Glemsford Primary Academy	Ormiston Sudbury Academy					

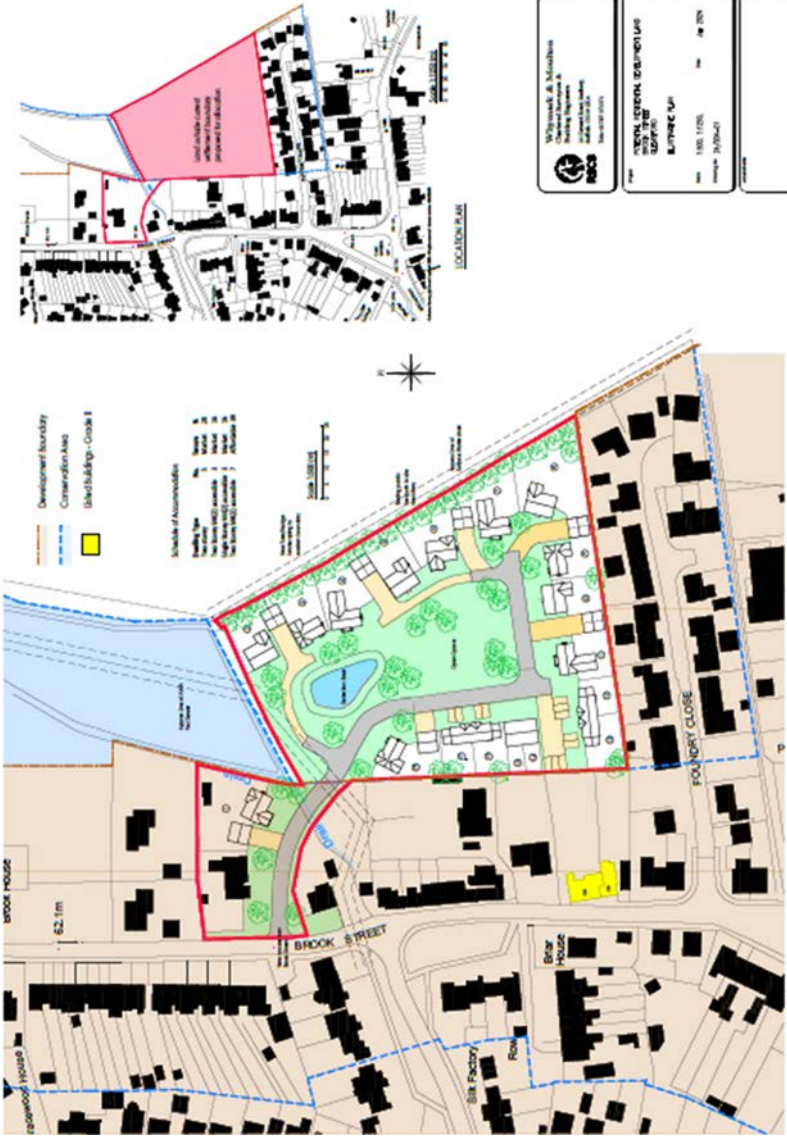
Name	Organisation	Comment
		<p>SCC welcomes the population data detailed after paragraph 2.6. This could be enhanced by providing more detailed data, as mentioned in the below.</p> <p>The Office for National Statistics<sup>2</sup> shows 2021 population data for Glemsford with a population of 3,700. Of these, 24.8% of residents are aged 65+ which is above the England average of 18.4% and displays an ageing population.</p> <p><b>Minerals and Waste</b></p> <p>Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means that SCC makes planning policies and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan,<sup>5</sup> adopted in July 2020, which forms part of the Local Development Plan.</p> <p><b>Transport</b></p> <p>SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe as well as providing and managing flood risk for highway drainage and roadside ditches.</p> <p><i>Masterplan Supporting Document</i></p> <p>This document needs to reference Suffolk Design: Streets Guide and latest version of Suffolk Guidance for Parking (2023) in the relevant sections (DC07.1/4 and 7.2). Bin storage/ presentation generally accords with our requirements although could reference that it shouldn't obstruct the highway. Porous drainage on driveways and parking areas must ensure that surface water doesn't enter the adjacent highway so on slopes and in some circumstances, conventional drainage may also be necessary. DC12.3 - SUDS next to highways must accord with Suffolk Design: Streets Guide on adoptable roads.</p> <p>I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the SCC's Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources. The guidance can be accessed here: <a href="#">Suffolk County Council Neighbourhood Planning Guidance</a>.</p>

Name	Organisation	Comment
Noted		
	Babergh District Council	<p>This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning). Thank you for consulting Babergh District Council on the Regulation 14 Pre-Submission Draft Glemsford Neighbourhood Plan (the 'Plan'). This letter and the appended schedule of comments represents our formal response.</p> <p>We note that your Plan has been prepared and written within the context of the Joint Local Plan (JLP), Part 1 of which was formally adopted by this Council on 21 November 2023. Whether or not it was a conscious decision of the Parish Council not to progress this Plan too far while the planning policy position at the district level was in a state of transition is unclear, but it does now mean that you should have a Plan that will need to undergo an immediate review. Because your consultation period has overlapped with the adoption of JLP Part 1, some minor modifications are necessary to ensure that references to the JLP are correct. We set these out in the attached.</p> <p>You also correctly anticipated the publication of the new National Planning Policy Framework (NPPF), which appeared on 19 December 2023. We are still assessing the changes, as no doubt you are, and more specifically, what implications they might have for neighbourhood plans. Of note so far are the changes to paragraph 14 and paragraph 73. We refer to the latter in our comments on GLEM 4. Other more mundane changes include paragraph numbers. We have listed those that we consider to be relevant within your plan.</p> <p>We trust that you will find our comments helpful. If a further discussion would be helpful on any of points raised by us, then please do not hesitate to contact us.</p> <p><b>General Observations</b> <b>NPPF updates</b></p>

Name	Organisation	Comment
		<p>As noted in our covering letter, we are still assessing the changes to the NPPF. As a minimum, some references to NPPF paragraphs within your Plan need updating. We listed below those we see as being relevant:</p> <ul style="list-style-type: none"> <li>• Within para 3.2, change this to read: <i>'In December 2023, the government published a revised NPPF.'</i></li> <li>• Within para 8.4, this should now read: <i>'..., with paragraph 88 stating that planning policies and decisions should enable.'</i></li> <li>• Para's 9.17 &amp; 9.18 should both now refer to <i>'paragraph 106 of the NPPF (Dec 2023).'</i></li> <li>• Para 9.4 should now refer to NPPF paragraph <u>180</u></li> <li>• Para 10.5 should now refer to NPPF paragraph <u>131</u></li> <li>• Para 10.12 should now refer to NPPF paragraph <u>191[c]</u></li> <li>• Para 11.4 should now refer to NPPF paragraph <u>97</u></li> </ul> <p>Your supporting evidence documents are also likely to contain NPPF references. These should also be checked and updated where appropriate.</p> <p>You will have realised there is no Chapter 7. Presumably, a drafting error. When correcting this do not forget to update any 'in plan' cross-references.</p>
The Plan will be updated to reflect the latest version of the NPPF		
<b>Late representation</b>		
J Murphy		<p>I am contacting you regarding the viability for housing development of Site 12, which is currently marked as unsuitable on page 23 of the draft NP. In particular, I would draw your attention to the following paragraph:-</p> <p>This application covers almost the whole of site 12 and a smaller area could be suitable in principle to the north of Foundry Close (no further east than Foundry Close), but as there is no clear access point this appears to be currently unsuitable. If access could be achieved from Brook Street this could be a potential location for new development.</p>



Name	Organisation	Comment
		<p>I would like to bring to your notice that, in collaboration with Messrs Slater, owners of 2 empty properties in Brook Street, we can now offer the smaller area of Site 12 referred to, with access onto Brook Street. We have submitted this site to Babergh DC for consideration following their recent "call for sites", and I have attached the relevant plan below.</p> <p>We regret that we were unaware of the pre-submission consultation period which ended 5th January, but note that the NP is still in draft form, so we hope that you will be able to amend the classification of Site 12, or part thereof, in light of the connection via Brook Street now being available.</p>

Name	Organisation	Comment
		 <p>The image is a technical site plan for a development project. It features a large area outlined in red, which contains various buildings, a central green space with a pond, and surrounding streets including Brook Street and Fountry Close. A legend on the left identifies symbols for development boundaries, commercial areas, and listed buildings. A north arrow and scale bar are also present. A location map in the top right corner shows the site's position within a larger urban context. Technical details and a title block are located in the bottom right corner.</p>

Name	Organisation	Comment
		The content of the late representation is noted. The inclusion of the suggested site would require the Parish Council to carry out a further 'pre-submission' consultation on the draft Plan. It is noted that the site has been submitted to Babergh DC as part of their call for sites and we are happy to leave it to them to determine whether they wish to include the additional site in the Part 2 Local Plan.

## Appendix 7 - Schedule of Post Pre-Submission Consultation Modifications

The table below sets out the changes made to the Neighbourhood Plan following the Regulation 14 Pre-Submission Consultation and the reasons for the modifications.

Changes to paragraph numbers or policy numbers subsequent to the deletion of paragraphs or policies are not identified in this schedule.

Deletions are struck through eg ~~deletion~~ Additions are underlined eg addition

Page	Para/Policy No	Modification	Reason
Cover		Amend as follows:  <del>Pre-Submission Draft Plan – November 2023</del> <u>February 2025</u>	To bring the Plan up-to-date
2		Amend list of stages as follows:  Before a Neighbourhood Plan can be brought into force it needs to complete the following stages: 1 – “Pre-submission” consultation on draft Plan by Parish Council <u>(carried out between 11 November 2023 and 5 January 2024)</u> 2 – Submission of draft Plan to Babergh District Council 3 – “Submission” consultation on draft Plan by Babergh District Council <u>(current stage)</u> 4 – Independent examination of draft Plan 5 – Parish Referendum <del>(if deemed necessary by the Examiner)</del> 6 – If majority vote in favour of Plan, adoption by Babergh District Council	To bring the Plan up-to-date
6	1.6	Amend as follows:  This document is formally known as the <del>Pre-Submission Draft</del> Neighbourhood Plan. It has been prepared <del>on the basis that that</del> <u>in the context of</u> Part 1 of the <del>new Joint Babergh Mid Suffolk</del> <u>Joint Local Plan is expected to be adopted by the District Council</u>	To bring the Plan up-to-date

Page	Para/Policy No	Modification	Reason
		in November 2023. The Neighbourhood Plan is now the subject of a <u>further</u> period of consultation when residents, landowners, business operators and any other interested parties, including councils and government bodies have the opportunity to comment on its content.	
6	1.7	<p>Amend as follows:</p> <p>Following the <u>pre-submission</u> consultation, comments received <del>will be</del> <u>were</u> reviewed and <u>necessary changes made</u>. <del>The</del> the Neighbourhood Plan will <del>then</del> <u>now</u> follow the steps illustrated before the planning policies in it can be adopted by Babergh District Council. <u>Once adopted it will be</u> <del>and</del> used alongside those in the adopted Local Plan and the National Planning Policy Framework (NPPF) when the District Council determines planning applications. Occasionally the NPPF is updated and, in such circumstances, those changes will supersede the policies in the Neighbourhood Plan.</p> <p>Amend flow chart to bring up-to-date</p> <pre> graph LR     A[Pre-Submission Draft Consultation] --&gt; B[Submission to Babergh DC]     B --&gt; C[Further Consultation]     C --&gt; D[Independent Examination]     D --&gt; E[Parish Referendum]     E --&gt; F[Plan is "made" (adopted)]   </pre>	To bring the Plan up-to-date
7	Views Assessment	<p>Amend as follows:</p> <p><b>Views Assessment</b></p>	To provide consistent reference to supporting documents



Page	Para/Policy No	Modification	Reason
		There are many fine and long-distance views from publicly accessible locations within the parish that could be impacted by development proposals. An <u>appendix to the Landscape Appraisal specifically assessed important views</u> , <del>separate Assessment of Important Views</del> has been prepared to identify the most important views within the parish to provide guidance when new development is proposed.	
10	3.2	Amend second sentence as follows:  In <del>September 2023</del> <u>December 2024</u> the government published a Revised NPPF.	To bring the Plan up-to-date
10	3.4	Delete paragraph  <del>The government has stated that more substantive changes to the NPPF are to be published as part of their planning reform measures. The draft Neighbourhood Plan will be brought up to date to reflect such changes should they be published before it is submitted to Babergh District Council.</del>	To bring the Plan up-to-date
10	3.5	Amend as follows:  <del>At the time of publishing the Plan, Babergh District Council were expected to adopt Part 1 of the Joint Babergh Mid Suffolk Local Plan towards the end of November 2023. Part 1 contains the strategic policies that the Neighbourhood Plan has to be in conformity with, as well as the "development management" policies against which the detail of planning applications will be determined. Work on the preparation of Part 2 of the Joint Local Plan, covering the distribution of housing growth and the allocation of sites is expected to commence in 2024. As such, there is no strategic planning policy in place in terms of Glemsford's position in the District settlement hierarchy or any planning housing growth.</del>  <u>At a more local level, the Neighbourhood Plan has been prepared in the context of the current Babergh Local Plan, which comprises the Babergh and Mid Suffolk Joint</u>	To bring the Plan up-to-date

Page	Para/Policy No	Modification	Reason
		Local Plan – Part 1, adopted in November 2023 and referred to as JLP1 in this Neighbourhood Plan. It provides a set of strategic and local development management policies, which will be used to inform decisions on planning applications and appeals. These do not need to be repeated in the Neighbourhood Plan but which the Neighbourhood Plan can complement by adding locally based detail. As at March 2025, Policies SP01 to SP10 are the strategic policies of the Local Plan. In February 2025 the District Council published a new “Local Development Scheme” that sets out a proposal to prepare a new Joint Local Plan with Mid Suffolk District Council. Work was to commence during 2025, but the Plan was unlikely to be adopted until 2029.	
10	3.6	Amend second sentence as follows;  <del>There are no</del> The sewage treatment works is a safeguarded sites within the neighbourhood area but much of the parish does fall within a Minerals Consultation Safeguarding Area and the District Council will consult the County Council on planning applications that fall within this area.	In response to comments
12	5.1	Amend as follows:  As noted above, the strategic planning policy framework for Babergh is contained in Part 1 of the Joint Local Plan. The November 2020 <u>draft</u> Joint Local Plan identified a Settlement Boundary for the main built-up area of the village. However, the Settlement Boundary has not been taken forward due to the outcome of the examination of the Joint Local Plan and the adopted Glemsford Settlement Boundary remains that contained in the adopted Babergh Local Plan (2006) <u>until replaced by the adoption of the Neighbourhood Plan.</u>	To bring the Plan up-to-date
12	5.2	Amend as follows:	To provide consistent reference to Local Plan

Page	Para/Policy No	Modification	Reason
		Policy SP03 of <del>Part 1 of the Joint Local Plan JLP1</del> states that "the principle of development is established within settlement boundaries in accordance with the relevant policies of this Plan." The policy also states that, outside the settlement boundaries, "development will normally only be permitted where the site is allocated for development, <del>or in a</del> it is in accordance with a made Neighbourhood Plan, or is specifically permitted by other relevant policies of this [Local] Plan, or it is in accordance with paragraph 80 of the NPPF (2021)." <u>[nb – paragraph 80 is paragraph 84 in the NPPF 2024]</u>	and to bring Plan up-to-date
12	5.3	Amend by replacing full-stop with comma as follows:  The Settlement Boundary (defined as the Built-Up Area Boundary in the 2006 Local Plan) is out-of-date in places and does not reflect housing developments that have taken place since that time <del>;</del> and does not reflect the situation on the ground.	Grammatical correction
15	6.1	Add additional bullet point to end as follows:  <ul style="list-style-type: none"> <li>• <u>24.8% of residents are aged 65+, this is above the England average of 18.4% and displays an ageing population.</u></li> </ul>	In response to comments
16	6.3	Amend first sentence as follows:  Policy <del>SP02</del> <u>SP01</u> of the <del>Part 1 Joint Local Plan JLP1</del> identifies a need to deliver at least 7,904 new homes across Babergh between 2018 and 2037.	In response to comments
16	6.4	Amend as follows:  As noted in the Policy Context chapter, Glemsford was designated as a Core Village in the settlement hierarchy of the draft Joint Local Plan (November 2020) <u>in recognition</u>	In response to comments

Page	Para/Policy No	Modification	Reason
		of the level of services and facilities available in the village. That designation no longer has any status as a result of the adoption of the <u>Part 1 Joint Local Plan JLP1</u> and the settlement hierarchy will now be addressed <del>at a later date in Part 2 of</del> <u>in the new Joint local Plan.</u>	
16	6.9	Amend as follows:  <del>Glemsford was designated as a "Core Village" in the Babergh Core Strategy (2014) recognising that it provides a range of services and facilities for smaller villages in its hinterland. Further managed housing growth will help sustain existing services and employment ensuring Glemsford continues to provide a wide range of services and facilities to meet its own needs and those of its hinterland. Further managed housing growth will help sustain those services and their employees and ensure the continued sustainability of the village.</del>	In response to comments
19	6.21	Amend first sentence as follows:  Affordable housing should be provided in accordance with the requirements set out in Policy SP02 of <u>JLP1</u> <del>Part 1 of the Joint Local Plan</del> , which requires 35% of the development to be affordable.	To bring the Plan up-to-date
20		Amend bullet point 4 under Movement and access as follows:  <ul style="list-style-type: none"> <li>Means of ensuring a safe crossing of Park Lane should be provided to enable improved linkage into the public rights of way network, <u>supporting the wider ambition for better cycling and walking connectivity between Glemsford and Long Melford, as identified in Babergh District Council's Local Cycling and Walking Infrastructure Plan.</u></li> </ul>	In response to comments

Page	Para/Policy No	Modification	Reason
21	GLEM 3	Add following to end of policy:  <u>Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.</u>	In response to comments
21	6.25	Amend as follows:  <u>Paragraph 76 of the NPPF states that "Local planning authorities should support the development of exception sites for community-led development....on sites that would not otherwise be suitable as rural exception sites." Part 1 of the Joint Local Plan</u> <u>However, JLP1 provides little in the way of a detailed guidance for the delivery of affordable housing on a rural exception site.</u>	In response to comments and to bring the Plan up-to-date
23	8.2	Amend final sentence by adding full-stop to end	To correct error
23	8.5	Amend as follows:  At a local level, Policy SP05 of <del>Part 1 of the Joint Local Plan</del> <u>JLP1</u> identifies strategic employment sites across the district, with the nearest being at Sudbury	To bring the Plan up to-date
24	GLEM 5	Amend first paragraph as follows:  The retention and development of existing employment and other business uses, including those identified on the Policies Map, will be supported providing such proposals do not have a detrimental impact on the local landscape character, heritage assets, residential <u>amenity</u> (including noise, light and air pollution, loss of privacy and overlooking), traffic generation, <del>identified</del> <u>important views identified on the Policies Map</u> and <del>identified</del> <u>important gaps in the built-up area.</u>	To improve clarity of the policy

Page	Para/Policy No	Modification	Reason
25	8.8	<p>Amend first sentence as follows:</p> <p>The Neighbourhood Plan supports the creation of additional jobs where such development <del>wouldn't</del> <u>would not</u> have a detrimental impact on the character of the area, the local road network and the amenity of residents living near the site or on the access route to the site.</p>	In response to comments
25	GLEM 6	<p>Amend as follows:</p> <p>Proposals for new business development will be supported where sites are located within the Settlement <del>Boundaries</del> Boundary identified on the Policies Map where they would not have an unacceptable impact on residential amenity, heritage assets and the highways network.</p> <p>Outside the Settlement <del>Boundaries</del> <u>Boundary</u>, proposals will be supported where:</p> <ul style="list-style-type: none"> <li>a. it is located on land designated in the development plan for business use; or</li> <li>b. it relates to small scale leisure or tourism activities or other forms of commercial / employment related development or agriculture related development of a scale and nature appropriate to a countryside location.</li> </ul> <p>Where possible, business developments should be sited in existing buildings or on areas of previously developed land and be of a size and scale that does not adversely affect the character, highways, infrastructure, residential amenity, environment (including national and international designated sites) and landscape character as identified in the Neighbourhood Plan Landscape Appraisal.</p>	In response to comments
26	9.2	Amend as follows:	To bring the Plan up-to-date



Page	Para/Policy No	Modification	Reason
		Part of the parish is included in the Stour Valley Project Area, a distinct area that lies upstream of the nationally designated Dedham Vale Area of Outstanding Natural Beauty and which follows the valley of the River Stour. It is illustrated on Map 5. <u>The Parish Council has joined "Wilder Together in the Stour Valley" to support local people to take action for wildlife by creating a network of wildlife-friendly spaces on both public and private land, including gardens.</u>	
27	9.4	Amend first sentence as follows:  Paragraph <del>174</del> 180 of the NPPF states that "planning policies and decisions should contribute to and enhance the natural and local environment" while at the local level, Policy SP09 of <del>Part 1 of the Joint Local Plan</del> <u>JLP1</u> requires development to:	To bring the Plan up-to-date
29	GLEM 7	Amend second paragraph as follows:  Proposals for new buildings outside the Settlement Boundary will be required to be accompanied by a Landscape <u>and</u> Visual Impact <u>Assessment</u> <del>Appraisal</del> or other appropriate and proportionate evidence that demonstrates how the proposal can be accommodated in the countryside without having a detrimental impact, by reason of the buildings scale, materials and location, on the character and appearance of the countryside and its distinction from the built-up area.	In response to comments
29	9.12	Amend final sentence as follows:  Additional views were identified in <del>the Stour Valley Project Area Valued Landscape Assessment</del> <u>Appendix 1 of the Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment Final Report - March 2018.</u> <del>and all of these</del> <u>The views and the source of their identification</u> are identified on Map 7.	In response to comments

Page	Para/Policy No	Modification	Reason
30	Map 7	Amend map to distinguish between source of important views	In response to comments
30	9.13	Amend final sentence as follows:  Landscape <u>and</u> Visual Impact Assessments (LVIA) are a recognised tool that specifically aims to ensure that all possible effects of change and development both on the landscape itself and on views and visual amenity are considered in decision-making.	In response to comments
30	GLEM 8	Amend as follows:  Important views from public vantage points either within the built-up area or into or out of the surrounding countryside are identified on the Policies Map. Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan <u>Landscape Character Appraisal : Appendix - Assessment of Views and Appendix 1 of the Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment Final Report - March 2018.</u>	To provide consistent reference to supporting documents
30	9.15	Amend as follows:  <del>In November 2021 The Environment Act received Royal Assent and will, when fully enacted, require new developments to deliver a minimum 10 per cent biodiversity net gain. In August 2021 a British Standard for Biodiversity Net Gain was published (BS8683) to provide a standard for designing and implementing such requirements. The timing of the introduction of the minimum requirement is unclear at present but within the Neighbourhood Plan Area, residents and developers are encouraged to deliver a measurable net gain in biodiversity as part of planning proposals. Under the Environment Act 2021, there is now a statutory requirement for development, with a</del>	To bring the Plan up-to-date

Page	Para/Policy No	Modification	Reason
		<p>few exceptions, to deliver a minimum 10 per cent measurable net gain in biodiversity. <u>This is to be measured using DEFRA's biodiversity metric and all net gains will need to be secured and monitored for at least 30 years. A Local Nature Recovery Strategy is being prepared for Suffolk which will include:</u></p> <ul style="list-style-type: none"> <li>• <u>a local habitat map showing where valuable areas for nature are currently located;</u></li> <li>• <u>a statement of biodiversity priorities - a locally agreed list of priority areas where new and improved habitats would bring the most benefit; and</u></li> <li>• <u>a map of locations and actions showing where and how habitats can be created and connected, and how the wider environment and economy can benefit.</u></li> </ul> <p><u>When complete, it will provide a blueprint for how Suffolk's local communities, landowners, local authorities, private companies, and government bodies can work together to; broaden protection, restore, and recover nature on the ground.</u></p>	
30	GLEM 9	<p>Amend last paragraph as follows:</p> <p>Otherwise acceptable development proposals will be supported where they provide a net gain in biodiversity through, for example:</p> <ol style="list-style-type: none"> <li>The creation of new natural habitats including ponds;</li> <li>The planting of additional native trees and hedgerows of local provenance and;</li> <li>Restoring and repairing fragmented biodiversity networks. <del>through, for example,</del></li> </ol> <p><u>In addition to the statutory requirements, development will be supported where it incorporates provision within dwellings and their plots for measures including swift bricks-boxes, bat boxes and holes in fences which allow access for hedgehogs.</u></p>	In response to comments
32	10.1	Amend fourth sentence as follows:	To correct error

Page	Para/Policy No	Modification	Reason
		Details are contained in Appendix <del>X</del> <u>2</u>	
33	10.6	Amend first sentence as follows:  Policy SP10 of <del>Part 1 of the Joint Local Plan</del> <u>JLP1</u> requires all development to mitigate and adapt to climate change through:	To bring the Plan up-to-date
33	10.7	Amend as follows:  Policy LP24 of <del>Part 1 of the Joint Local</del> <u>JLP1</u> sets out a detailed policy concerning the design of new development and the protection of residential amenity.	To bring the Plan up-to-date
33	10.9	Amend as follows:  As part of the government-funded Neighbourhood Planning Technical Support package, design guidelines have been prepared by AECOM Consultants (Glensford Design <u>Guidance and Codes</u> – September 2021). The guidelines are published as supporting evidence to the Neighbourhood Plan and seek to inform the design that any future development should follow to retain and protect the rural, tranquil nature and scenic beauty of the area. The Design <u>Guidance and Codes</u> <u>contain a development design checklist which is</u> <del>are reproduced in Appendix 3 X of the Plan while Appendix 4 contains the Design Codes development design checklist to which</del> development proposals should respond, as appropriate <del>to the proposal</del> .	In response to comments
34	GLEM 11	Amend policy by adding additional criteria to end as follows:  <u>o. Integrate energy efficient technologies such as photovoltaic and heat pumps.</u>	In response to comments
35	10.10	Amenda as follows:	In response to comments

Page	Para/Policy No	Modification	Reason
		The elevated position of the main built-up area of the village is such that flooding from rivers and watercourses is not a problem for the area. However, it is a very different situation in the vicinity of the River Stour and the River Glem, which are in Flood Zone 3 where there is a high probability of flooding resulting from the watercourses overflowing. There are some areas in the village that are also susceptible to surface water <u>flooding and groundwater flooding, particularly during events of</u> <del>resulting from</del> heavy or persistent rain.	
35	10.11	<p>Amend paragraph as follows:</p> <p>New developments in Glemsford must be designed to not increase the risk of surface water flooding, <u>either on the development site or elsewhere in the village</u>. As such, proposals will be required, <del>where appropriate,</del> to make provision for the management of surface water run-off. The use of Sustainable Drainage Systems (SuDS) will be necessary on larger developments and supported on smaller schemes in accordance with the guidance published by Suffolk County Council, the Lead Local Flood Authority, <u>and should provide multifunctional benefits such as amenity and biodiversity</u>. <del>Part 1 of the Joint Local Plan JLP1</del> includes Policy LP27 – ‘Flood risk and vulnerability’ and it is not necessary to repeat the requirements of that policy in the Neighbourhood Plan.</p>	In response to comments
36	11.1	<p>Amend as follows:</p> <p>As identified earlier in the Plan, Glemsford has a good range of services and facilities which meet most of the day-to-day requirements of residents, although it is fair to say that the Covid-19 pandemic at the beginning of the 2020's <del>following</del> <u>followed</u> by the UK economic downturn has had a significant impact on the viability of many businesses with many no longer functioning.</p>	In response to comments

Page	Para/Policy No	Modification	Reason
37	11.5	<p>Amend as follows:</p> <p>Policy LP28 of <u>JLP1</u> <del>Part 1 of the Joint Local Plan, as proposed to be modified following examination</del>, sets out how proposals for the provision of new or expanded services and facilities will be considered and also states that proposals "involving or comprising of the loss of an existing community facility, service or a premises, which is currently or last used to provide such use, will only be permitted if either;</p> <ul style="list-style-type: none"> <li>a. Compensatory provision of an alternative or improved facility will be provided in an equally accessible or improved location or</li> <li>b. The applicant can sufficiently demonstrate that the service or facility is not viable and is no longer performing a functional role in its current or future form and it is not needed for an economically viable alternative community use." </li></ul>	In response to comments
37	11.7	<p>Amend the first sentence as follows:</p> <p>The Neighbourhood Plan relies on Policy LP28 of <del>Part 1 of the Joint Local Plan</del> <u>JLP1</u> which would apply to:</p> <ul style="list-style-type: none"> <li>i. proposals for new and or expanded facilities, or</li> <li>ii. development that would result in the loss of existing facilities</li> </ul> <p>Amend Part 1c under Policy LP28 as follows:</p> <p>c. All development should <del>be of have a high-quality development</del> <u>have a high</u> standard of design and sympathetic to the surrounding landscape and townscape, with no adverse effects on heritage assets and their settings.</p> <p>Amend Part 2a as follows:</p>	In response to comments



Page	Para/Policy No	Modification	Reason
		a. Compensatory provision of an alternative or improved facility will be provided in an equally accessible or improved location; or	
39	12.5	Amend as follows:  The NPPF seeks to promote sustainable transport through reducing the impacts of development on transport networks and promoting walking, cycling and public transport. Policy LP29 of <u>JLP1</u> <del>the emerging Joint Local Plan, as proposed to be modified following examination,</del> sets out a number of criteria against which development will be assessed in terms of traffic impact and improvements to travel.	In response to comments
40	12.6	Amend as follows:  Because most road improvements can take place within the highway, they do not require planning permission and, as such, the neighbourhood plan is not an appropriate place to contain policies for their improvement. However, although the Parish Council cannot deliver highway improvements, it does have a lobbying role in delivering such measures. Likewise, the provision of bus services is a decision made outside the planning system. <del>However, although the Parish Council cannot deliver highway improvements, it does have a lobbying role in delivering such measures,</del> <u>but the Parish Council will advocate for the needs of Glemsford within the Suffolk Enhanced Partnership Passenger Group.</u>	In response to comments
42	Village Centre Inset Map (north)	Amend the Local Green Space Designation LGS4 to exclude the church building	In response to comments
47	Appendix 2	Amend by inserting the following after the first sentence:	In response to comments

Page	Para/Policy No	Modification	Reason
		The information in this appendix is correct at the time of writing the Plan. An up to date record of all listed heritage assets should always be sought from Historic England or other reliable sources of information.	
48	Appendix 3	Under Building heights and roofline and the second bullet point as follows and delete the third bullet point:  <ul style="list-style-type: none"> <li>• Have the proposals paid careful attention to height, form, massing <u>and scale?</u></li> <li>• <del>and scale?</del></li> </ul>	To correct error
Back cover		Amend as follows:  <del>Pre –</del> Submission Draft Plan – February 2025_ <del>2023</del>	
<b>Supporting Documents</b>			
Local Green Space Assessment		Amend LGS5 to delete reference to Tree Preservation Order	In response to comments