

## Babergh District Council

### Glemsford Neighbourhood Plan 2023 – 2037

#### Submission Draft consultation responses

In March 2025, Glemsford Parish Council (the 'qualifying body') submitted their draft Neighbourhood Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Wednesday 9 April until Friday 30 May 2025.

Thirteen representations were received. They are listed below and copies are attached.

Glemsford Parish Council were also given an opportunity to respond to new issues raised at this stage. Their response is included at the end of the document.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Historic England
(4)	Natural England
(5)	Environment Agency
(6)	Anglian Water
(7)	Water Management Alliance
(8)	National Highways
(9)	Sport England
(10)	James Bailey Planning Ltd (obo Bloor Homes)
(11)	Savills (UK) Ltd (obo Rainier Developments and Strategic Land)
(12)	Resident - North
(13)	Landowner - Murphy
(14)	Response from Glemsford Parish Council

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# (1) SUFFOLK COUNTY COUNCIL

Date: 30<sup>th</sup> May 2025  
Enquiries to: Busranur Serin  
Tel: 01473 265631  
Email: [neighbourhoodplanning@suffolk.gov.uk](mailto:neighbourhoodplanning@suffolk.gov.uk)



Planning Policy Team,  
Babergh District Council,  
Endeavour House,  
8 Russell Road,  
Ipswich,  
IP1 2BX

Dear Paul Bryant,

## **Submission Consultation version of the Glemsford Neighbourhood Plan**

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Glemsford Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in strikethrough.

## Natural Environment

### *Policy GLEM8 – Protection of Important Views*

Within SCC's response to the pre-submission (Regulation 14) consultation stage, it was commented that:

“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.

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.”

SCC notes that the Appendix still identifies 17 views, consisting of 10 Views In (VI) and 7 Views Out (VO) however, Map 7 still displays 13 views. This inconsistency and lack of explanation as to why the additional 4 views are included in the Appendix but not in the Plan itself would create confusion in the decision-making process, and thus should be clarified. This will also aid in complying with NPPF paragraph 129, part d, of taking into account “the desirability of maintaining an area's prevailing character and setting”. This further detail should also be clarified to ensure the plan is clear and unambiguous, as per NPPF paragraph 16, part d.

This policy states that the views are shown on the Policies Map however the views in the map are not labelled in respect to their titles in the Appendix. SCC recommends that either; the views shown on Map 7 and the Policies Map should be labelled in line with their titles given in the Appendix to better identify their location in relation to other services, facilities and landmarks, or the views should be listed in Policy GLEM 8. Both amendments will ensure compliance with the NPPF paragraph 16, part d, by being clear and unambiguous and ensure the plan accords with Basic Condition A.

Additionally, the place labels within the photos in the Appendix are very pixilated and mostly illegible. They should be updated for better clarity and location finding.

Whilst not a Basic Condition matter, there is missing “VI” from the “VIEWS” captions on Appendix document page 3 and 5.

## Transport

SCC reiterates the previous comments made at Regulation 14 stage:

“Policy GLEM11 (Development Design) SCC notes that parts g) and i) should reference and accord with Suffolk Design: Streets Guide (2022)<sup>1</sup>; parts h), k), and n) should reference and accord with Suffolk Guidance for Parking (2023)<sup>2</sup>.”

This would provide clarity to applicants and developers, as well as Local Planning Authority decision makers.

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<sup>1</sup> <https://www.suffolk.gov.uk/asset-library/imported/5647-21-Suffolk-Design-Street-Guide-v26.pdf>

<sup>2</sup> <https://www.suffolk.gov.uk/asset-library/Suffolk-Guidance-for-Parking-v5.1.pdf>



## General

There is a typographical error in Policy GLEM3 – Land west of Park Lane:

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

Within SCC’s response at Regulation 14 stage, it was outlined that the photograph underneath Policy GLEM6 – New Businesses and Employment has no figure identification, and its purpose is unclear. SCC queries if it aims to convey an approval of small business enterprises or a criticism of commercial clutter. A figure identification and/or caption should be added to ensure the Neighbourhood Plan is in line with NPPF paragraph 16, part d, of being clear and unambiguous.

### *Formatting and layout issues*

The contents list refers to “Appendix 1: Views” however the section titled 29 Visual Sensitivity in the Landscape Capacity chapter discusses “the representative views in Appendix A.” It is unclear if both of these are referring to the same Appendix and contain a typo error, or if these are different appendices entirely. SCC recommends that the Parish Council reviews this to ensure compliance with NPPF paragraph 16, part d, of being clear and unambiguous.

Furthermore, the Appendix containing the Views is titled “LANDSCAPE CHARACTER APPRAISAL: APPENDIX – VIEWS” which also does not demonstrate clear signposting. SCC recommends that this document is retitled with either “Appendix 1” or “Appendix A” to make it clear.

The contents list is vastly inconsistent with the headings within the document. There are multiple instances of heading titles being labelled differently between the contents list and the headings themselves; the numbering is out of sync and some headings referenced in the contents list are missing entirely from the body of the document. SCC recommends that the contents list and the section headings are reviewed to make correct reference.

### *Local Green Space Assessment*

The site details table for green space 9 - School Playing Field states that this land is by Suffolk County Council. It is noted for clarity that SCC does not own this land and SCC only has a leasehold, not the freehold.

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If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Busranur Serin  
Planning Officer  
Growth, Highways, and Infrastructure

## (2) BABERGH DISTRICT COUNCIL

Our ref: Glemsford NP R16 Response  
Dated: 30 May 2025

From: Planning Policy Team, Babergh District Council  
To: The Independent Examiner

*Sent by e-mail*

Dear Examiner,

### **Regulation 16 Submission Draft Glemsford Neighbourhood Plan 2023 – 2037 Comments and observations from Babergh District Council**

This response is made for and on behalf of Robert Hobb, Head of Strategic Planning (Planning Policy and Infrastructure) at Babergh & Mid Suffolk District Councils.

We last commented on this Plan in January 2024 when it was made available for pre-submission consultation. Having revisited our representation and seen how those comments have been addressed; as set out in the Consultation Statement, we are pleased to see that most of our recommendations have been taken onboard. We are also mindful that between the pre-submission consultation starting, and the formal submission of this Plan, there has been the publication of two iterations of the National Planning Policy Framework (December 2023, and December 2024), and more recently, our announcement to proceed with a full Joint Local Plan Review. These changes have been appropriately referenced, e.g., at paragraph 3.4, but some further editing of supporting text is required. We have suggested wording where necessary.

Our overall conclusion is that, with appropriate modification, the Glemsford Neighbourhood Plan will provide a suitable framework for decision making, albeit that the Parish Council may also wish to start giving some thought towards whether an early / partial review of their Plan might be necessary as the picture becomes clearer in terms of district level housing requirements. We expand a little more on this in our comments appended to this cover letter.

We trust that our comments are helpful and will be happy to answer any questions.

Yours sincerely,

Paul Bryant

Neighbourhood Planning Officer | Planning Policy Team

Babergh & Mid Suffolk District Councils

T: 01449 724771 / 07860 829547 | E: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)



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**Babergh and Mid Suffolk District Councils**  
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX  
Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) / [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

## Regulation 16 Submission draft Glemsford Neighbourhood Plan 2023- 2037

### Comments and observations from Babergh District Council

#### General Observation

There is still no Chapter 7.

#### Chapter 5 – Planning Strategy

**Policy GLEM 1:** Suggest including a cross-reference to Map 3 in the second sentence:

*‘... as defined on Map 3 and on the Policies Map, where the principle of development is accepted.’*

#### Chapter 6 - Housing

**Para 6.3:** The Parish Council should now be aware that part of our decision to proceed with a full JLP Review, rather than a Part 2 Plan, is to enable us to take into account the Governments latest house building requirement figures. For Babergh, this equates to a need to deliver 775 new homes per annum over the JLP Review plan period. Work originally intended to inform our Part 2 Plan is now being used to inform the Review, but it will also take time to develop a new settlement hierarchy and a new spatial strategy which, in turn, will inform our decision making on housing site allocations needed to accommodate this new level of growth. Consequently, it will also take time to assess what implications this may have for individual neighbourhood plan groups. Early discussions on this matter have already taken place and any eventual outcome, relevant to Glemsford, will need to be addressed either through the JLP Review and/or through an early review of this Neighbourhood Plan.

For now, the first sentence in para 6.3 reflects the current position, but the second and third sentences need updating. We suggest the following:

*With the distribution of further growth now to be determined through a full review of the Joint Local Plan; which will take into account the Governments latest district level housing requirement figures, there is currently no published minimum requirement figure for how many additional homes Glemsford will be asked to deliver. It is now expected that any new housing requirement for Glemsford will be set out in the JLP Review, which is unlikely to be completed until after this Neighbourhood Plan is adopted.*

Within **Policy GLEM 3**, please also note that the second sentence should cross-refer to ‘(Figure 1)’, and not Figure X.

**Para 6.4:** This paragraph now broadly follows the suggestion we put forward at the R14 stage. However, the first part, i.e., “As noted in the Policy Context Chapter,” remains factual incorrect and needs deleting so that the sentence starts with: “Glemsford was ...”.

**Para 6.5:** We would prefer it if the first sentence read as follows ...’*Until a new settlement hierarchy is established, the ..... ‘*

## [Current] Chapter 8 – Employment

**Para 8.4:** Minor modification. At the end of the first sentence, add the word '*enable*' [as per NPPF paragraph 88].

## [Current] Chapter 9 - Natural Environment

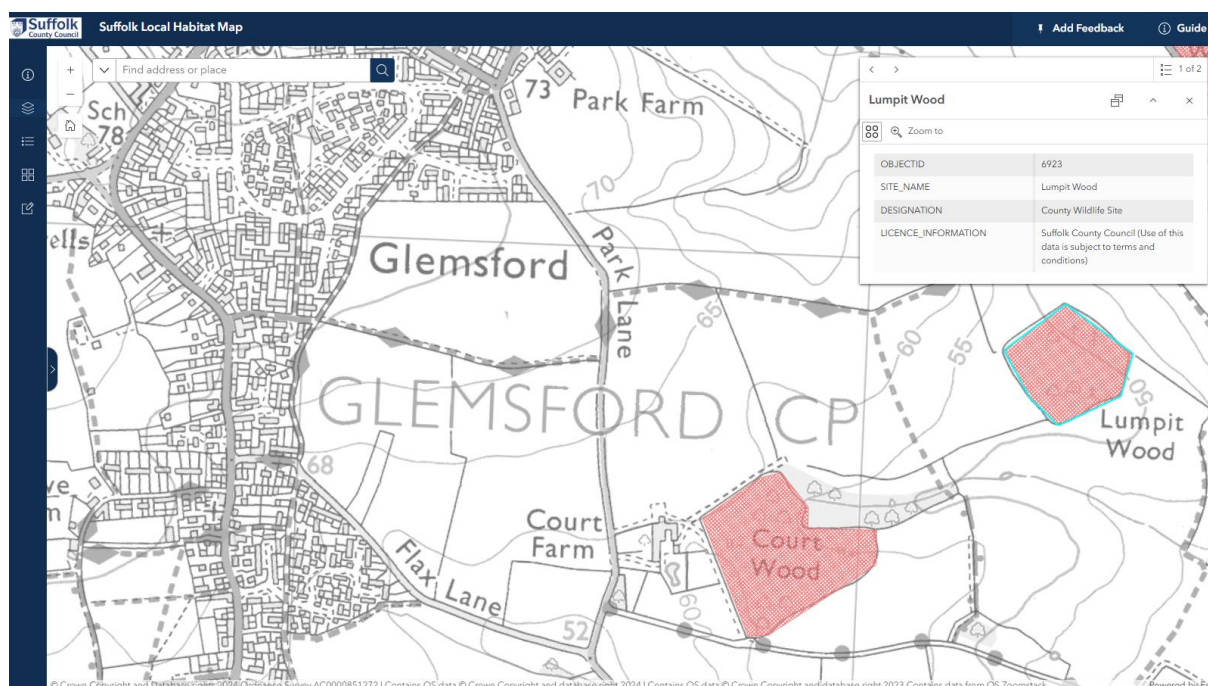
**Para 9.2:** Minor modification. In February 2024, it was announced that AONBs were to be re-named 'National Landscapes'. It would therefore be appropriate to amend para 9.2 to now refer to the 'Dedham Vale National Landscape'.

**Para 9.12 - 9.13, Map 7, Policy Inset Maps, Policy GLEM 8 - Important Views:** The amendments to para's 9.12 - 9.13, and Map 7 are noted. However, we are still finding it difficult to identify which view is which, so repeat our request that these should be numbered and named within the Plan itself for both clarity and ease of reference. This would require annotating Map 7, the Policy Inset Maps, and listing/naming the views in Policy GLEM 8.

**Para 9.1:** In our R14 response, we suggested this paragraph could go further by also mentioning Lumpit Wood, a County Wildlife Site close to and north-east of Court Wood SSSI. Responding, the Consultation Statement (document page 79) explains that mapped details of the extent of County Wildlife Sites are not freely available. We do accept that this has been the case for some time but that position has now changed following the publication, by Suffolk County Council, of an interactive 'local habitat map' map as part of the consultation being undertaken by them on the Suffolk Local Nature Recovery Strategy. At the time of this response, the Draft Strategy Map can be accessed via a link given below.

<https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/local-nature-recovery-strategy>

A screen grab (below) taken from the above website to show the location of Lumpit Wood is also included here for convenience.



The other responses to our R14 comments are noted. These were to perhaps include a reference to off-site biodiversity net gain provision, and to set out an action to undertake a more detailed biodiversity audit.

**Policy GLEM10 - Local Green Space # 9:** A question directed to the Qualifying Body (the Parish Council) with regard to LGS # 9 - School Playing Field ...

It has been suggested that this land is no longer being used by the Primary School, or that access to use it has now been withdrawn. Are the Parish Council able to clarify the latest position and, if access is no longer permitted, do they think that that this proposed local green space still meets all of the relevant NPPF criteria?

#### [Current] **Chapter 10 - Built and Historic Environment**

**Para 10.9:** Minor modification. To repeat our R14 comment, amend this paragraph to refer to the '*Glensford Design Guidance and Codes – September 2021*' by its full name in the first sentence.

#### **Policy Maps**

See our comment above about numbering the 'Important Views' for ease of identification.

[Ends]

### (3) HISTORIC ENGLAND

**E from:** Historic England  
**Rec'd:** 21 May 2025  
**Subject:** Re: Glemsford Neighbourhood Plan Regulation 16 Consultation

Dear Sir/Madam,

#### **Re: Glemsford Neighbourhood Plan Regulation 16 Consultation**

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of the Glemsford Neighbourhood Plan.

Having reviewed the plan and supporting documentation, we do not consider it necessary to provide detailed comments at this stage. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on [eastplanningpolicy@historicengland.org.uk](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. 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.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Andrew Marsh BSc MA MRTPI  
Historic Environment Planning Adviser  
Development Advice | East of England  
Historic England

Historic England  
Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU  
[www.historicengland.org.uk](http://www.historicengland.org.uk)

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Ensuring our heritage lives on and is loved for longer.  
[historicengland.org.uk](http://historicengland.org.uk)

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## (4) NATURAL ENGLAND

Date: 29 May 2025  
Our ref: 509571  
Your ref: Glemsford Neighbourhood Plan

Mr Paul Bryant  
Babergh & Mid Suffolk District Councils

**BY EMAIL ONLY**

[communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)



Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ  
T 0300 060 3900

Dear Mr Bryant

**Glemsford Neighbourhood Plan - Regulation 16 Consultation**

Thank you for your consultation on the above dated 08 April 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely  
Sally Wintle  
Consultations Team

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-in-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>4</sup> website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>



## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

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<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

## (5) ENVIRONMENT AGENCY



Paul Bryant  
Babergh & Mid Suffolk District Councils  
Endeavour House  
8 Russell Rd  
Ipswich  
IP1 2BX

**Our ref:** AE/2023/129049/02-L01  
**Your ref:** Glemsford Reg 16  
**Date:** 30 May 2025

Dear Paul

### **CONSULTATION ON R16 GLEMSFORD NP**

#### **GLEMSFORD PARISH**

Thank you for the consultation dated 08 April 2025. We have reviewed the documents as submitted and have no further comments to make.

Having commented previously on this plan we are pleased to see that our previous comments have been taken on board. We therefore have no further detailed comments to make in relation to this plan.

We trust this advice is useful.

Yours sincerely

**Mr Jack Saunders**  
**Sustainable Places - Planning Advisor**

Direct e-mail: [Jack.Saunders@environment-agency.gov.uk](mailto:Jack.Saunders@environment-agency.gov.uk)  
Team email: [Planning.Eastanglia@environment-agency.gov.uk](mailto:Planning.Eastanglia@environment-agency.gov.uk)  
Team phone number: 02030 255475

## **(6) ANGLIAN WATER**

**E from:** Carry Murphy, Anglian Water

**Rec'd:** 19 May 2025

**Subject:** Consultation on R16 Glemsford NP (Babergh DC) - Anglian Water response 19/05/25

Dear Sir/ Madam,

Anglian Water has previously submitted comments on the pre-submission version (Reg 14) of the draft Glemsford neighbourhood plan. I can confirm, Anglian Water has no further comments to make.

I should be grateful if you could please acknowledge receipt of this representation and keep me updated on further progress made on the neighbourhood plan. Thank you.

Yours faithfully,

**Carry Murphy**

Chartered Town Planner - MRTPI

**Spatial and Strategic Planning Manager – Sustainable Growth**

**Quality & Environment**



Web: [www.anglianwater.co.uk](http://www.anglianwater.co.uk)

**Anglian Water Services Limited**

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire. PE29 6XU

## (7) WATER MANAGEMENT ALLIANCE

**E from:** Water Management Alliance  
**Rec'd:** 8 April 2025  
**Subject:** Consultation on R16 Glemsford NP (Babergh DC) -

Good afternoon,

Thank you for your consultation on the above planning application. Having screened the application, the site in question lies outside the Internal Drainage District of the East Suffolk Water Management Board as well as the Board's wider watershed catchment, therefore the Board has no comments to make.

Kind Regards



**Pardip Choat BSc (Hons) MCIWEM**

Compliance Officer

Water Management Alliance

e: [Planning@wlma.org.uk](mailto:Planning@wlma.org.uk)

Registered office: Pierpoint House, 28 Horsley's Fields, Kings Lynn, Norfolk, [PE30 5DD](postcodes/PE305DD)  
t: 01553 819600 | e: [info@wlma.org.uk](mailto:info@wlma.org.uk) | [www.wlma.org.uk](http://www.wlma.org.uk)

WMA members: [Broads Drainage Board](#), [East Suffolk Water Management Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#), [Waveney, Lower Yare and Lothingland Drainage Board](#)

In Association with: [Pevensey and Cuckmere Water Level Management Board](#)

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If you receive this email late at night, early in the morning, or at the weekend - it means I am working flexibly. Flexibility works for me, but please do not feel that you should have to pick this up outside of your own normal working hours.

With our commitment to ISO 14001, please consider the environment before printing this e-mail.

Defenders of the Lowland Environment

Our ref: NH/25/10728  
Your ref: Glemsford N'hood Plan Reg 16

'Glemsford NP Consultation'  
c/o Planning Policy Team  
Babergh District Council  
Endeavour House  
8 Russell Road, Ipswich, Suffolk, IP1 2BX.

**Shamsul HOQUE**  
Operations (East)  
Spatial Planning Team  
National Highways  
Woodlands  
Manton Lane, Bedford  
MK41 7LW

Tel: 07850 907600

15 April 2025

Via email to: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

Dear Sir/Madam,

**Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 ~ The Glemsford Neighbourhood Plan 2023 - 2037**

National Highways welcomes the opportunity to comment on the consultation of the Draft Glemsford Neighbourhood Plan - Regulation 16 which covers the plan period from 2023 to 2037.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to the Glemsford Neighbourhood Plan, National Highway's principal interest is in safeguarding the operation of the trunk road A14, part of the SRN.

We have reviewed the plan and note the plan area and location that is covered are remote from the A14. Consequently, the draft policies set out are unlikely to have an impact on the operation of the A14 and National Highways offers no comment.

We do not have any more comments on this.

Yours sincerely,

S. H.  
Dr Shamsul Hoque  
Assistant Spatial Planner  
[PlanningEE@nationalhighways.co.uk](mailto:PlanningEE@nationalhighways.co.uk)

## (9) SPORT ENGLAND

**E from:** Planning.Central@sportengland.org  
**Rec'd:** 14 April 2025  
**Subject:** RE: Consultation on R16 Glemsford NP (Babergh DC) - ends Fri 30 May

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

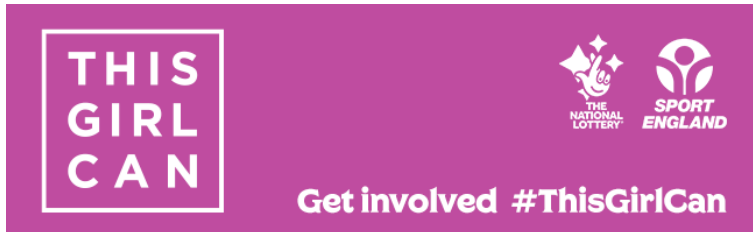


If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

**Planning Technical Team**

E: [planning.central@sportengland.org](mailto:planning.central@sportengland.org)



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

## (10) JAMES BAILEY PLANNING LTD (obo BLOOR HOMES)

**E from:** Suzanne Nugent, James Bailey Planning Ltd  
**Rec'd:** 28 May 2025  
**Subject:** Representations to Glemsford NDP Regulation 16 Consultation - Bloor Homes  
**Attached:** Bloor Homes - Glemsford NP Reg 16 Form - JBPL May 2025 (Form & Written Rep)

Dear Planning Policy Team

On behalf of Bloor Homes, James Bailey Planning Ltd are pleased to attach our representations to the Glemsford Neighbourhood Development Plan (Regulation 16) consultation. A response form has also been completed and attached; however, this should be read alongside our full representations for completeness.

We would be grateful if you could please acknowledge receipt of the attached representations and if you have any queries, please do not hesitate to contact me.

Many thanks

Kind regards

Suzanne

Suzanne Nugent **MRTPI**

W: [www.jamesbaileyplanning.com](http://www.jamesbaileyplanning.com) T : 01284 336068

E : [suzanne@jamesbaileyplanning.com](mailto:suzanne@jamesbaileyplanning.com)



**RTPI**  
Chartered Town Planners



## Section One: Respondents Details

All respondents should complete Part A. If you are an Agent, please complete Part's A & B

Part A: Respondent	
Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	Bloor Homes
Address:	c/o Agent
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	James Bailey Planning Ltd
Address:	Stirling House 3 Abbeyfields Bury St Edmunds Suffolk
Postcode:	IP33 1AQ
Tel No:	01284 336068
E-mail:	<a href="mailto:james@jamesbaileyplanning.com">james@jamesbaileyplanning.com</a>

## Section Two: Your comment(s)

Which part of the Plan does your comment relate? Use separate forms if necessary.

<b>Paragraph No.</b>	Please refer to our full representations (see below)	<b>Policy No.</b>	Please refer to our full representations (see below)
----------------------	--	-------------------	--

**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	X
<b>Support with modifications</b>		<b>Have Comments</b>	

**Please give details of your reasons for support / opposition / other comments:**

**\*\*A summary is provided below, however please read this alongside our full representations submitted with this form, titled: 'Representations to the Glemsford Neighbourhood Development Plan Submission Consultation (Regulation 16), Bloor Homes, May 2025'\*\*\***

Bloor Homes consider that the draft Glemsford Neighbourhood Plan fails to contribute to sustainable development. This is because not all of the options have been fully or properly considered within the SEA, as a small portion of land west of Duffs Hill has only ever been considered. The two options explored through the SEA have led to the consideration of either: 1) piecemeal development through the allocation of three smaller sites; versus 2) one large single development to the south of the village. However, a larger site to the north (Land west of Duff Hill) could have been considered in accordance with the proposed Concept Masterplan (see Appendix 3 of our full representations).

Bloor Homes also considers that the draft Neighbourhood Plan also fails to have regard to National Policy and Guidance. This is because there is no clear justification for the proposed housing requirement figure, and the allocated site as currently proposed is at odds with the housing requirement figure, as the developer is promoting a development to double the housing requirement.

Notwithstanding the housing requirement figure that is currently being proposed in the Draft Neighbourhood Plan, it is also important to consider the emerging position of the Babergh and Mid Suffolk Local Plan. In light of the Government's increased mandatory housing requirement, there is likely to be a significant increase in the housing requirement for Glemsford, as Babergh has identified in their recent document: '*Planning for the Future*'.

The draft Neighbourhood Plan therefore risks being in conflict with an emerging Local Plan, and contrary to the positive approach that the District Council is trying to take to meet Government housing targets.

--

<b>If seeking changes, what improvements or modifications would you suggest?</b>
<p><b>**A summary is provided below, however please read this alongside our full representations submitted with this form, titled: ‘Representations to the Glemsford Neighbourhood Development Plan Submission Consultation (Regulation 16), Bloor Homes, May 2025’**</b></p> <p>Rather than proceeding to referendum at this time, the Parish could make some proactive steps to work closely with the new Joint Local Plan process, by identifying enough suitable sites to address the significantly increased indicative housing requirement figures provided by the District Council.</p>

Note: If you are including additional pages these should be clearly labelled and referenced.

Normally, the appointed Examiner will consider all matters through the written representations. If necessary, they may hold a hearing [this may be a virtual meeting or a meeting held in person] to discuss a particular issue. If you consider that a hearing should be held, please explain why this is necessary.

The decision on whether or not to hold a hearing is entirely at the discretion of the Examiner.

<b>I consider that a hearing should be held because ...</b>
To allow for our comments to be fully considered.

--

**Please indicate below** (use X, or type Yes) **if you wish to be notified by e-mail of:**

Our publication of the Independent Examiners Report on this plan	X
The ‘making’ (adoption) of the Glemsford NP by Babergh District Council	X

**Please sign and date your response** (a typed signature is acceptable)

Signed: Suzanne Nugent (on behalf of James Bailey Planning Ltd)	Dated: 28.05.25
---	-----------------



**James Bailey**  
**PLANNING**

**Document:**

Glemsford Neighbourhood Development Plan  
Submission Consultation (Regulation 16)

**Title:**

Representations to the Glemsford Neighbourhood  
Development Plan Submission Consultation  
(Regulation 16)

**Client:**

Bloor Homes

**Date:**

May 2025

## TABLE OF CONTENTS

1. EXECUTIVE SUMMARY .....	2
2. INTRODUCTION.....	3
3. REPRESENTATIONS IN RELATION TO THE BASIC CONDITION – CONTRIBUTION TO SUSTAINABLE DEVELOPMENT .....	4
4. REPRESENTATIONS IN RELATION TO THE BASIC CONDITION – REGARD TO NATIONAL POLICY AND GUIDANCE .....	7
5. SUMMARY AND CONCLUSION .....	10

APPENDIX ONE – Representations to the Glemsford Neighbourhood Plan Pre-submission Draft (Regulation 14) on behalf of Bloor Homes  
(prepared by Stantec - January 2024)

APPENDIX TWO – Potential Access and Off Site Improvements Plan (Ref 2103470)

APPENDIX THREE – Concept Masterplan (Ref P22\_034\_002\_V3)





## **Glemsford Neighbourhood Plan (2023 – 2037)**

### **Submission Draft (Regulation 16) Consultation**

#### **1. EXECUTIVE SUMMARY**

- 1.1 These representations to the Glemsford Neighbourhood Plan (2023 – 2037) Submission Draft (Regulation 16) Consultation, have been prepared by James Bailey Planning Ltd. (JBPL) on behalf of Bloor Homes.
- 1.2 Bloor Homes have previously made representations to the Glemsford Neighbourhood Plan, most recently in response to the Regulation 14 consultation in January 2024. At this point in the Neighbourhood Plan process, concerns were raised in relation to the proposed site allocation (GLEM 3 - Land west of Park Lane), and the mismatch between the proposed allocation of the site for 100 dwellings and the current promotion of this site for 230 dwellings by Rainier Developments. These comments have not been taken into consideration, and therefore Bloor Homes continue to raise their concerns at Regulation 16 stage.
- 1.3 For clarity, earlier representations on behalf of Bloor Homes in connection with the Land west of Duffs Hill were previously submitted by Stantec. James Bailey Planning Ltd. are now continuing to promote the Land west of Duffs Hill, Glemsford on behalf of Bloor Homes.
- 1.4 At Regulation 16 stage, a Neighbourhood Plan must demonstrate that it meets the requirements of the 'basic conditions'.
- 1.5 Bloor Homes object to the Glemsford Neighbourhood Plan on the basis that:
  - the Plan fails to contribute to sustainable development; and
  - the Plan fails to have regard to national policy and guidance from the Secretary of State.

## 2. INTRODUCTION

- 2.1 These representations have been prepared by James Bailey Planning Ltd. (JBPL) on behalf of Bloor Homes in response to the Glemsford Neighbourhood Plan (2023 – 2037) Pre-Submission (Regulation 16) consultation.
- 2.2 Glemsford was designated as a 'Neighbourhood Area' on 13<sup>th</sup> October 2017. This was followed with a Regulation 14 consultation in January 2024, which Bloor Homes responded to. This response is included in Appendix One.
- 2.3 This current consultation forms the final consultation stage, and therefore comments are invited by Babergh District Council regarding whether the 'plan proposal' fulfils the 'basic conditions' (Paragraph 8, Schedule 4B Town and Country Planning Act (as amended)).
- 2.4 For clarity, these 'basic conditions' require that the Plan:
- Has regard to national policy and guidance from the Secretary of State.
  - Contributes to sustainable development.
  - Is in general conformity with the strategic policy of the development plan for the area of any part of that area.
  - Does not breach or is otherwise compatible with EU obligations - this includes the SEA Directive of 2001/42/EC.
  - The making of the neighbourhood plan is not likely to have significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010 (d), either alone or in combinations with other plans and projects.
- 2.5 These representations focus upon Bloor Homes' contention that the Neighbourhood Plan fails to contribute to sustainable development, and fails to have regard to national policy and guidance from the Secretary of State.

### 3. REPRESENTATIONS IN RELATION TO THE BASIC CONDITION – CONTRIBUTION TO SUSTAINABLE DEVELOPMENT

3.1 Bloor Homes wishes to raise a number of concerns regarding the evidence base supporting the Neighbourhood Plan, namely that 'The Site Options and Assessment Report' (SOAR) prepared by AECOM in 2021, has not included a thorough assessment of the potential sites. This has led to the options which are carried forward into the SEA being misinformed as not all of the reasonable alternatives have been assessed. It therefore cannot be concluded that the Neighbourhood Plan contributes to sustainable development.

3.2 The purpose of the SOAR is to provide an assessment of all sites potentially suitable for development, taking Local Plan policy and national planning criteria into account to establish which, if any, of the sites are suitable for development. Site 8 (Land west of Duff's Hill) is included within the Assessment report as a potentially suitable site. However, this site was only considered suitable for 10 dwellings. The SOAR provides a summary of the SHELAA assessment for Site 8 which concluded that:

*"The road off which access would be provided is narrow and may not be able to support a significant amount of new vehicle movement arising from new development. Access should be discussed with Highways officers." (page 75, SOAR)*

3.3 While the summary is clearly inconclusive on the matter of access, it raises a number of questions regarding access which have not been followed up or reviewed since the initial assessment in 2020. Bloor Homes have sought initial advice from a highways consultant in terms of the potential improvements that could be made to the access road to serve a much greater quantum of development than 10 dwellings. The response to this is shown within The Potential Off Site and Access Improvements Drawing Ref: 2103470 which has been submitted previously and has been provided alongside these representations. See Appendix Two.

3.4 The SOAR assessment was produced in 2020 and has not subsequently been updated and therefore it is evident that Bloor Homes' comments made in relation to the Regulation 14 consultation have not been taken into consideration. The issue of the access road has not been revisited, despite additional evidence being available.

3.5 Notwithstanding the above, the method of site assessment used within the SOAR also appears to have been inconsistently applied between all of the sites. While the report states that the sites that had already been assessed through the District Council's SHELAA process, were not reassessed as part of the SOAR, it is noted that Site 4 was re-considered as it previously received a red rating in the SHELAA. The report states that:

*"given the lack of information provided for the red rating of this site in the SHELAA it has been reassessed using a standard site proforma." (page 52, SOAR) [Emphasis added]*

- 3.6 Bloor Homes consider that all sites should have been assessed using the standard site proforma as part of the Neighbourhood Plan process, regardless of whether they had previously been assessed in the SHLAA. This would ensure that the site assessment process is clear and consistent. There are full proformas for sites 1-7 with images associated with sites which suggests that a site visit was made, but there is only a brief SHELAA summary for sites 8-12, with no site photos. Failure to fully assess all sites to the same level of detail results in a lack of robust evidence, to subsequently inform the other crucial piece of evidence, the SEA.
- 3.7 The Strategic Environmental Assessment (SEA) is another piece of evidence underpinning the site selection process and this assesses each of the sites which were identified as suitable within the SOAR as part of a number of spatial strategy options (see Figure 1 below) including:
- Option 1: Land east of Duffs Hill (25-30 homes)
  - Option 2: Land west of Duffs Hill (10 homes)
  - Option 3: Land west of Park Lane (100 homes)
  - Option 4: Land south-east of George Lane (20-30 homes)



Figure 1: Extract from the Glensford SEA 2024 which shows a smaller portion of land west of Duffs Hill.

3.8 Regarding Site 2, the SEA states that:

*“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.”*

3.9 As the site was only considered for 10 dwellings, this led the SEA to determine that there were only two options that could meet the desired housing growth figure of between 51 and 100 homes; these being:

- Option A: Site 1, Site 2, and Site 4 combined.
- Option B: Site 3.

3.10 Site 8 has therefore been amalgamated within Option A. However, it is contested that all of the options have not been fully or properly considered within the SEA, as a small portion of land west of Duffs Hill has only ever been considered. The two options explored through the SEA have led to the consideration of either: 1) piecemeal development through the allocation of three smaller sites; versus 2) one large single development to the south of the village. However, a larger site to the north (Land west of Duff Hill) could have been considered in accordance with the proposed Concept Masterplan.

3.11 It is unsurprising that the SEA considers Option B to be the most sustainable given it is one single site with the potential to improve infrastructure, in comparison to the piecemeal approach of Option A. In fact, a further Option – Option C should be considered if terms of delivering up to 100 dwellings at Land west of Duffs Hill.

3.12 The Land west of Duffs Hill was assessed favorably in the SHELAA in terms of all other aspects, and should not have been reduced to frontage development, without full consideration of highways improvements that could be achieved.

#### 4. REPRESENTATIONS IN RELATION TO THE BASIC CONDITION – REGARD TO NATIONAL POLICY AND GUIDANCE

- 4.1 Bloor Homes considers that the Neighbourhood Plan preparation process has failed to have regard to National Policy in their decision making, as the housing requirement figure has not been justified in accordance with national policy. Furthermore, there is a mismatch between the proposed Neighbourhood Plan allocation (Land west of Park Lane GLEM3) for 100 dwellings, and the current promotion of this site for 230 dwellings by Rainier Developments.
- 4.2 The SEA refers to the lack of strategic policy as a starting point for the Neighbourhood Plan housing requirement figure, in the absence of the Babergh and Mid Suffolk Joint Local Plan Part 2. It should be noted that this section of the SEA is now considered to be out of date as Babergh and Mid Suffolk have announced that they will be undertaking a full review of the Local Plan.
- 4.3 Nevertheless, in the absence of any housing requirement figure within the Local Plan, it is acknowledged within the NPPF that:

*“Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the Neighbourhood Area and the most recently available planning strategy of the local planning authority”. (Para. 70).*

- 4.4 It is very unclear how the housing requirement has been derived within the Draft Neighbourhood Plan. There is no mention of any engagement with Babergh and Mid Suffolk in terms of seeking a housing requirement figure within the Neighbourhood Plan’s supporting evidence base, or indeed the consideration of population or local housing need data.
- 4.5 Without this evidence, it is difficult to justify the proposed housing requirement figure. It is noted that the SEA does reference the communities’ preference for between 51 to 100 dwellings to be delivered over the Neighbourhood Plan period. However, is this sufficient evidence to justify the housing requirement figure?
- 4.6 There is also currently a significant mismatch between the Neighbourhood Plan’s proposed allocation of 100 dwellings at land west of Park Lane (GLEM3) and the current promotion of the site by Rainier Developments for 230 dwellings. Is the Council content to be allocating a site which seeks to provide almost double the housing requirement? The Concept Masterplan shown on page 20 of the Neighbourhood Plan and the Concept Masterplan on Rainiers Development’ website are significantly different (see the following link- [Glemsford - Rainier Developments](#)). Allocation of the Park Lane site could result in a much larger quantum of development, which is at odds with the housing requirement figure set out within the Neighbourhood Plan, especially in light of the lack of evidence to justify the housing requirement figure.

- 4.7 Bloor remains concerned that a lack of evidence supporting the housing requirement figure, coupled with the allocation of a site which is focused upon delivering a much larger quantum of development, will not deliver a Neighbourhood Plan which reflects the desires of the Parish.
- 4.8 The land west of Duff's Hill proposes an appropriately sized site for delivering the quantum of development envisaged by the residents of Glemsford.
- 4.9 The Concept Masterplan for the site at Duffs Hill clearly shows how the Parish's dwelling requirement could be met, while maintaining a large area of open space to the north of the site to provide a natural transition to the open countryside, (see Appendix Three).
- 4.10 While it is appreciated that the basic conditions require that a draft Neighbourhood Plan must be in general conformity with the strategic policies of the Development Plan ***in force*** at the time of writing, the Planning Practice Guidance also sets out the merits for considering any Local Plan information that is ***emerging***:

*"Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development."* (Source - Planning Practice Guidance. Paragraph: 009 Reference ID: 41-009-20190509)

- 4.11 It should be acknowledged by the Examiner that Babergh and Mid Suffolk are in their infancy in terms of preparing a new Local Plan. Following the announcement in February 2025, that in light of the Government's increased housing requirements (for Babergh this results in an 86% increase from 416 dwellings to 775 dwellings per annum) a Part 2 Joint Local Plan would not be produced, and instead a 'full' Local Plan review would be undertaken.
- 4.12 This announcement was shortly followed by the issuing of a '*Planning for the Future in Babergh and Mid Suffolk Briefing Pack*' for all Town and Parish Council's in March 2025, which includes the '*Neighbourhood Planning Interim Housing Requirement Advice*'.
- 4.13 Table 3 of this Advice Note includes indicative housing requirement figures for each Parish and sets out an indicative requirement for Glemsford of 600 dwellings over a 20-year period (see Figure 2 below).

Parish (ONS labelled)	Indicative requirement over 20-year period	Identified residual dwellings (on commenced sites)	Permitted residual dwellings (on not started sites) <sup>1</sup>	Indicative requirement minus permitted dwellings
Copdock and Washbrook	200	16	6	178
East Bergholt	450	220	10	220
Edwardstone	60	2	5	53
Elmsett	140	41	2	97
Freston	20	2	-	18
<b>Glemsford</b>	<b>600</b>	<b>-</b>	<b>11</b>	<b>589</b>

Figure 2: Extract from Table 3 - Babergh and Mid Suffolk District Council Neighbourhood Planning - Interim Housing Requirement Advice (March 2025)

- 4.14 This new information from Babergh and Mid Suffolk suggests that the housing requirement for Glemsford should be revisited. It is highly likely that the new Local Plan will seek to substantially increase the requirement for Glemsford within the new Local Plan process, which would then ‘supersede’ the Neighbourhood Plan, in accordance with paragraph 31 of the NPPF which states that:

*“Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.” (NPPF 2024, para.31)*

- 4.15 Furthermore, the Planning Practice Guidance states that:

*“Neighbourhood plans should consider providing indicative delivery timetables and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.” (Source - Planning Practice Guidance. Paragraph: 009 Reference ID: 41-009-20190509)*

- 4.16 In accordance with both the NPPF and the Planning Practice Guidance, the Neighbourhood Plan risks being in conflict with an emerging Local Plan. Therefore, rather than proceeding to referendum at this time, the Parish could make some proactive steps to work closely with the new Joint Local Plan process, to address the significantly increased indicative housing requirement figure for the village.



## 5 SUMMARY AND CONCLUSION

- 5.1 These representations set out the reasons why Bloor Homes contend that the Glemsford Neighbourhood Plan fails to meet the basic conditions.
- 5.2 Bloor Homes consider that the draft Glemsford Neighbourhood Plan fails to contribute to sustainable development. This is because not all of the options have been fully or properly considered within the SEA, as a small portion of land west of Duffs Hill has only ever been considered. The two options explored through the SEA have led to the consideration of either: 1) piecemeal development through the allocation of three smaller sites; versus 2) one large single development to the south of the village. However, a larger site to the north (Land west of Duff Hill) could have been considered in accordance with the proposed Concept Masterplan (Appendix 3).
- 5.3 Bloor Homes also considers that the draft Neighbourhood Plan also fails to have regard to National Policy and Guidance. This is because there is no clear justification for the proposed housing requirement figure, and the allocated site as currently proposed is at odds with the housing requirement figure, as the developer is promoting a development to double the housing requirement.
- 5.4 Notwithstanding the housing requirement figure that is currently being proposed in the Draft Neighbourhood Plan, it is also important to consider the emerging position of the Babergh and Mid Suffolk Local Plan. In light of the Government's increased mandatory housing requirement, there is likely to be a significant increase in the housing requirement for Glemsford, as Babergh has identified in their recent document: *'Planning for the Future'*.
- 5.5 The draft Neighbourhood Plan therefore risks being in conflict with an emerging Local Plan, and contrary to the positive approach that the District Council is trying to take to meet Government housing targets.
- 5.6 Rather than proceeding to referendum at this time, the Parish could make some proactive steps to work closely with the new Joint Local Plan process, by identifying enough suitable sites to address the significantly increased indicative housing requirement figures.
- 5.7 On this basis, the draft Glemsford Neighbourhood Plan should not proceed to referendum in its current form.



APPENDIX ONE: Representations to the  
Glemsford Neighbourhood Plan Pre-submission  
Draft (Regulation 14) on behalf of Bloor Homes  
(prepared by Stantec - January 2024)



# Glensford Neighbourhood Plan

## Welcome

Q1. Do you have any comments on Chapters 1, 2 and 3?

No

Q2. Do you support the Vision and Objectives in Chapter 4?

Yes

**Comments: (please specify Objective number if appropriate)**

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 Glensford 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.

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).

Bloor Homes are committed to working with the Parish Council to achieve these objectives.

Q3. Do you support Policy GLEM 1 - Spatial Strategy?

No

**If No, please state what changes you would like**

Bloor Homes agree with the need for Neighbourhood Planning to support policies in the adopted Local Plan.

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 Glensford in a highly visible and accessible area of the village. Bloor Homes would support Glensford in reconsidering the revised settlement boundary and wider spatial strategy for reasons set out within this consultation response.

Q4. Do you have any other comments on Chapter 5 - Planning Strategy?

Yes

**Comments:**

While Bloor Homes agree with the proposed planning strategy, they do not agree with the revised settlement boundary as it is currently drawn.

Rainier Development are currently promoting allocation GLEM3 for up to 230 dwellings on their website (<https://rainierdevelopments.co.uk/track-record/glensford/>). This is far greater than the necessary housing 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 Glensford.



**Q5. Do you support Policy GLEM 2 – Housing Delivery?**

Yes

**If No, please state what changes you would like**

Bloor Homes are committed to ensuring Glemsford can provide at least 100 dwellings in the Neighbourhood Plan area between 2023 and 2037.

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.

**Q6. Do you have any comments on Figure 1 - Site Development Concept?**

Yes

**Comments:**

Bloor Homes are aware that Rainier Developments are promoting the same land to the west of Park Lane for 230 dwellings on their website (<https://rainierdevelopments.co.uk/track-record/glemsford/>). 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 demonstrate, the land could accommodate up to 230 dwellings. This inefficient use of land should not be supported.

**Q7. Do you have any comments on the Development Principles in paragraph 6.22?**

No

**Q8. Do you support Policy GLEM 3 - Land west of Park Lane?**

No

**If No, please state what changes you would like**

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. On their website, Rainier Development are promoting land West of Park Lane for 230 dwellings (<https://rainierdevelopments.co.uk/track-record/glemsford/>) 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.

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 & visual impacts in the sensitive landscape area.

**Q9. Do you support Policy GLEM4 – Affordable Housing on Rural Exception Sites?**

No opinion

Q10. Do you have any other comments on Chapter 6 - Housing?

Yes

**Comments:**

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 delivered in a way supported by residents while meeting the residential housing needs set out within GLEM2.

Q11. Do you support Policy GLEM5 - Employment Sites?

No opinion

Q12. Do you support Policy GLEM 6 - New Businesses and Employment?

No opinion

Q13. Do you have any other comments on Chapter 8 - Employment?

No

Q14. Do you support Policy GLEM7 - Protection of Landscape Setting of Glemsford?

Yes

**If No, please state what changes you would like**

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 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.

Q15. Do you support Policy GLEM8 - Protection of Important Views?

No opinion

Q16. Do you support Policy GLEM9 - Biodiversity?

No opinion

Q17. Do you support Policy GLEM10 – Local Green Spaces?

No opinion



Q18. Do you have any further comments on Chapter 9 - Natural Environment?

No

Q19. Do you support Policy GLEM11 – Development Design?

No opinion

Q20. Do you support Policy GLEM12 – Artificial Lighting?

No opinion

Q21. Do you have any further comments on Chapter 10 - Built and Historic Environment?

No

Q22. Do you have any further comments on Chapter 11 - Services and Facilities?

No

Q23. Do you support Policy GLEM13 – Public Rights of Way?

Yes

**If No, please state what changes you would like**

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.

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.

Q24. Do you have any further comments on Chapter 12 - Travel?

No

Q25. Do you support the content of the Policies Map and Inset Maps?

No

**If No, please state what changes you would like**

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.

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.

**Q26. Do you have any comments on the Appendices?**

Yes

**Comments (please specify which appendix)**

Appendix 1 - Housing Site Selection - Site 2: Land west of Duffs Hill

Bloor Homes recognises the importance of a site selection process to shape, direct and deliver sustainable development within the neighbourhood plan area.

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.

**Q27. Do you have any other comments on the Draft Neighbourhood Plan?**

No

Q28. 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?

No

Q29. Data Protection Notice: All information collected and processed by the Parish Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended).

Please note: All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018.

<b>First Name</b>	Andrew
<b>Last Name</b>	Fisher
<b>Organisation</b>	Stantec (on behalf of Bloor Homes (Eastern))
<b>Email (optional)</b>	edward.jones@stantec.com
<b>Address (optional)</b>	Stantec, 3rd Floor, 50-60 Station Road, Cambridge, CB1 2JH

Q30. Would you like to be notified when the Parish Council submits the Plan to Babergh District Council?  
(if yes, please provide either address or email address above)

Yes

Q31. Would you be willing to have your contact details shared with Babergh District Council for the sole purpose of enabling that Council to keep you informed of further consultations on the Plan?

Data will be processed by Babergh District Council in accordance with their information security policies and Privacy Notice (available on their website).

Yes









## APPENDIX TWO: Potential Access and Off Site Improvements Plan (Ref 2103470)





Oxdown  
Barn

DUFFS HILL

2.4m x 160m VISIBILITY SPLAY  
BASED ON DMRB STANDARD  
FOR 50mph DESIGN SPEED

2.4m x 120m VISIBILITY SPLAY  
BASED ON DMRB STANDARD  
FOR 40mph DESIGN SPEED

Pond

67.2m

POTENTIAL CROSSING POINT  
(TACTILE PAVING / DROPPED KERB)

PROPOSED ACCESS LOCATION

2.4m x 120m VISIBILITY SPLAY  
BASED ON DMRB STANDARD  
FOR 40mph DESIGN SPEED  
(SHOWN TO TANGENT)

PROPOSED CARRIAGEWAY  
WIDENING

2.4m x 120m VISIBILITY SPLAY  
BASED ON DMRB STANDARD  
FOR 40mph DESIGN SPEED

POTENTIAL CROSSING POINT  
(TACTILE PAVING / DROPPED KERB)

POTENTIAL FOOTPATH  
CONNECTION POINT

PROPOSED CARRIAGEWAY  
WIDENING

POTENTIAL FOOTWAY WIDENING

62.8m

PROPOSED CARRIAGEWAY  
WIDENING

EXISTING CHANGE OF  
SPEED LIMIT -  
30mph SOUTH  
60mph NORTH

EXISTING PUBLIC RIGHT OF WAY

#### NOTES:

ACCESS SUBJECT TO SPEED SURVEY, STAGE 1  
ROAD SAFETY AUDIT, HIGHWAY BOUNDARY, LAND  
BOUNDARIES, DETAIL DESIGN AND HIGHWAY  
APPROVAL

#### KEY:

- ASSUMED HIGHWAY BOUNDARY
- TRANSCRIBED SITE BOUNDARY

Rev	Description	Dm	Chk	App	Date
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ENGINEERS

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worksafe  
www.ardent.com

SSIP

ISO 9001  
BUREAU VERITAS  
Certificate

Client

BLOOR HOMES

Project Title:

DUFFS HILL, GLEMSFORD

Drawing Title:

POTENTIAL ACCESS AND  
OFF SITE IMPROVEMENTS

A2 Scale	Date	Designed by
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1:500

07.05.21

DV

Drawn by	Checked by	Approved by
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DV

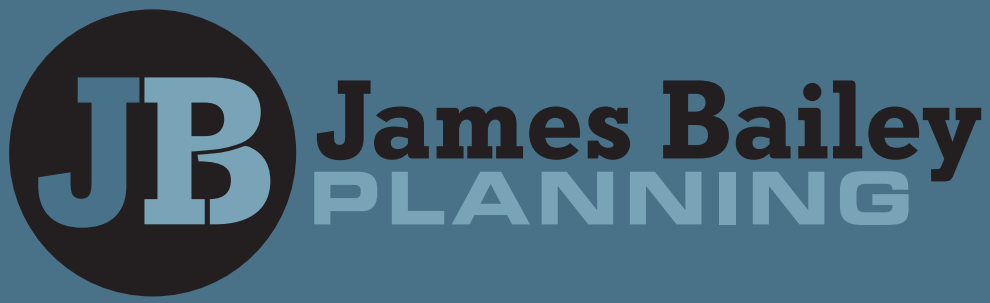
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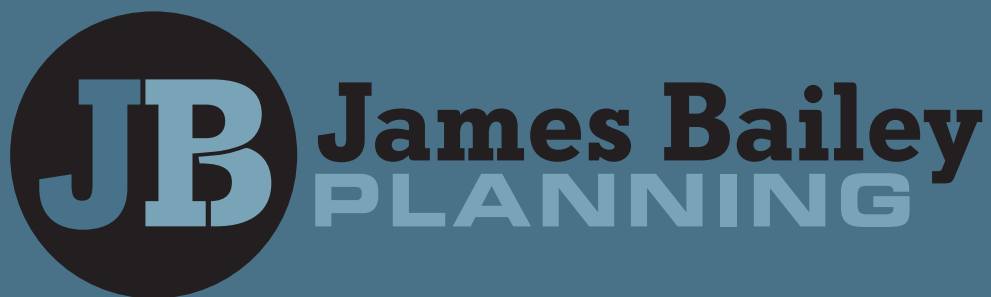
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APPENDIX THREE: Concept Masterplan  
(Ref P22\_034\_002\_V3)







# (11) SAVILLS (UK) LTD (obo RAINER DEVELOPMENTS AND STRATEGIC LAND)

**E from:** Nathan Rose, Savills  
**cc** Claire Mills, Jonathan Dixon, Errin Marshall  
**Rec'd:** 30 May 2025  
**Subject:** Glemsford Neighbourhood Plan (Regulation 16) - Representations Rainier  
**Attached:** NP Response\_Reg\_16\_May 2025 – Submission Version.pdf

Dear Sir/Madam,

Savills (UK) Ltd have been instructed by Rainier Developments and Strategic Land to prepare and submit representations to the Regulation 16 consultation draft Glemsford Neighbourhood Plan.

I would be grateful if you could please respond to this email confirming safe receipt of the attached representations as soon as possible.

If there are any issues downloading the document please do not hesitate to contact me.

Kind regards,

**Nathan Rose**  
**Planner**  
**Planning**



Savills, Unex House, 132-134 Hills Road, Cambridge, CB2 8PA

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30<sup>th</sup> May 2025  
CAPL/473116/A3/CM

Glemsford NP Consultation, c/o Planning Policy Team  
Babergh District Council  
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Dear Sir/Madam,

## **RESPONSE TO REGULATION 16 CONSULTATION: GLEMSFORD NEIGHBOURHOOD PLAN**

On behalf of our client, Rainier Developments and Strategic Land (hereafter called 'Rainier'), Savills (UK) Ltd is instructed to prepare and submit representations to the Regulation 16 consultation into the draft Glemsford Neighbourhood Plan. This relates to their interests at site GLEM3 (Land West of Park Lane), which is proposed for allocation.

Whilst the preparation of a Neighbourhood Plan is commended and a number of the principles contained therein are supported, certain requirements within the draft Plan appear to potentially lack the necessary evidence required to ensure the Plan contributes to sustainable development (which is a basic condition) and accords with national policies. Given the transitional arrangements provided at Annex 1 of the latest NPPF (2024), the Neighbourhood Plan has been considered against policies within the previous 2023 version.

For simplicity, the various matters that Rainier would like raised are set out below under the relevant policy subheadings or extracts. Any modifications proposed to policy wording or text within the Neighbourhood Plan are then set out in red for ease of reference.

### **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'.**

As set out within the Planning Practice Guidance (Reference ID: 41-040-20160211), "*proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order*". Such evidence then provides certainty and assurance that the policies set out within the Neighbourhood Plan would indeed reflect the basic condition to ensure sustainable development.

Based on the Reg 16 version of the Neighbourhood Plan and supporting evidence, it is considered that there potentially is not sufficient evidence to support the cap of 100 dwellings. Paragraph 128 of the NPPF (2023) is clear that "*Planning policies and decisions should support development that makes efficient use of land*", whilst taking into account five specified criteria including housing need, availability of land, infrastructure, local character and creating well designed places. Whilst the principle of a residential allocation on the site is supported, there are concerns that the cap of 100 dwellings is not adequately justified. This would result in what we consider to be a low density of 8.7dph (gross) and 12.5dph (net), which is uncharacteristic of the surrounding area. Paragraph 129 of the NPPF (2023) states "*Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site*". Given the notable uplift in housing need across the District (1,509dpa compared to 906dpa under the

previous standard method), there is significant pressure to find suitable housing sites such as GLEM3. Whilst the new method is associated with the latest NPPF and so does not apply under the transitional arrangements, it is still considered pertinent context in light of paragraph 129 of the NPPF (2023) which acknowledges that 'anticipated shortage' should be considered i.e. the consideration of future needs is relevant when determining appropriate densities and using land efficiently. In such circumstances, it is suggested that the allocation should not specify a fixed figure but instead facilitate some flexibility. This would ensure the basic condition to achieve sustainable development and accord with national policies is met. The high-level master planning work that has been commissioned to support the Neighbourhood Plan has been prepared in the absence of any technical work. Furthermore, a number of the 'Development Principles' set out under GLEM3 are not supported by an evidence base as will be clarified later within these representations. In such a context, it is considered suitable for the relevant part of policy GLEM3 to be amended as follows:

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

The above insertion ensures that any future scheme reflects the aspirations and expectations of the Parish Council whilst allowing for matters such as technical constraints and master planning and design aspirations to impact and shape the final design (and resulting density).

#### ***GLEM3 Land West of Park Lane***

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

Rainier has concerns with the requirement to accord with the Concept Diagram and certain Development Principles. This policy requirement appears to overlook the inherent nature of the Concept Diagram that was commissioned to inform the Neighbourhood Plan. As stated within the Master planning and Development Principles Document prepared by Aecom (August 2022), "*The final form of development will be arrived at following a more detailed process of design exploration based on a more comprehensive assessment of the site's opportunities and constraints. However, it is helpful to show how development might be arranged in accordance with the general design guidance and codes set out in the complementary document. Figure 14 shows how development could be arranged in such a way as to deliver the key open space components that gives structure and character to the proposals*".

The above extract is key to the effective delivery of the allocated site. The drafting of GLEM3 currently requires future planning applications to accord with a Concept Diagram that Aecom acknowledge was not based on a detailed design exploration or a comprehensive assessment of the site's opportunities and constraints. By way of example, with reference to a Constraints Plan appended to these representations, issues such as underground services and drainage have not been taken into account within the high-level master planning process undertaken by Aecom. This is not unusual at this initial high level testing stage. However, in light of further technical work undertaken since then, it is not technically possible to deliver the site 'in accordance with the Concept Diagram' as required by GLEM3. Therefore, this phrasing is too prescriptive. In order to address this issue, whilst still recognising the master planning work undertaken to date, it is suggested that the wording of policy GLEM3 should be amended as follows:

***'Subject to a review of the relevant technical constraints, ~~D~~development of the site should have regard to be undertaken in accordance with the Illustrative Site Concept Diagram (Figure 1) and the Development Principles set out in this Plan'.***

For consistency, it is also considered important for Figure 1 to be renamed '***Illustrative Site Concept Diagram***'. This would address the concerns set out above, as well as being in line with the supporting text already provided within the Draft Neighbourhood Plan which identifies the plan in paragraph 6.20 as an '*illustrative site concept diagram*'.

#### ***Development Principles (paragraph 6.22)***



Given that policy GLEM3 cross references accordance with the 'Development Principles', these effectively form part of the policy. Whilst certain requirements are supported, others raise some concerns and have the potential to undermine the ability to achieve sustainable development. They are considered below.

### ***Development Principle- Phasing***

The Neighbourhood Plan requires that *"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"*.

It is unclear why a site of this size would need to be split into two phases, with a timeframe of 2031 identified for the second phase. Whilst the Neighbourhood Plan references that it would help assimilate the development into the village, a cohesive single scheme would allow a more coordinated approach to the delivery of affordable housing, 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.

In the absence of evidence to justify the need for phasing the delivery of the site, it is requested that this requirement is **removed** from the Development Principles altogether to ensure the Neighbourhood Plan can guide development to sustainable solutions, as suggested in Planning Practice Guidance (PPG Reference ID: 41-072-20190509).

### ***Development Principle- A minimum five hectares of new green space***

Rainier is committed to delivering a high-quality landscape led development with generous areas of public open space. However, 5 hectares of new green space represents a substantial portion of the site (43%) and significantly exceeds any open space policy standards set out at District level (notably the Babergh and Mid Suffolk Open Space Assessment, 2019). If those standards are applied to a 100-dwelling scheme, assuming a 2.5 occupancy rate as set out within that assessment, it would equate to a minimum open space requirement of 0.6ha, some of which would not be expected to be provided on site for a scheme of this size. It is evident that green space of the magnitude set out within the current drafting of Policy GLEM3 goes beyond providing proportionate mitigation for the suggested scheme. As the PPG (Reference ID: 41-072-20190509) identifies, *"to demonstrate that a draft neighbourhood plan... contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions"*. The available evidence suggests the open space requirement set out within Policy GLEM3 is not based on sufficient or proportionate evidence. Indeed, policy GLEM10 acknowledges a number of existing open spaces within Glemsford are considered of sufficient quality to be identified as Local Green Spaces. It is noted that having green space as an integral part of this edge of settlement scheme would be a logical design assumption and provide notable benefit for both existing and new residents, which Rainier agrees with. However, it is considered that the prescriptive figure should be removed and replaced with alternative text as follows:

**A minimum five hectares of New green space will be provided as an integral part of the overall development of the site in accordance with the relevant adopted standards for open space at the time a planning application is determined.**

### ***Development Principle- 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.***

As with the above, there is no evidence-based justification for the size and extent of amenity space set out within this Development Principle. Without such justification, the Neighbourhood Plan does not guide development to sustainable solutions, in line with the basic condition statement to secure sustainable development. In this context, we consider that the prescriptive standards should be amended as follows:

~~'New amenity space, and play space (for children and youth), and two multi-purpose futsal courts/ multi-use games areas should be provided in accordance with open space standards and an assessment of local needs at the time of determination of a planning application and made available for the village to enjoy'.~~

***Development Principle- 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.***

This development principle appears to suggest only two storey dwellings would be acceptable. Such a restriction would limit the opportunity for bungalows and additional living accommodation within roof spaces (2.5 storey height), which we have assumed is not the intention here. Such an approach could restrict housing choice, notably for opportunities for M4(3) dwellings. It is therefore suggested that the Neighbourhood Plan should be modified to:

~~'Development of the site should allow for the views towards the surrounding landscape to still be visible from the main village, through the restriction of dwelling heights generally to a maximum of 2 storeys with a maximum of 2.5 stories in key locations to aid design coherency and legibility of layout.~~

***Development Principle - Buildings should be arranged with their frontages perpendicular to the road line.***

The justification for this design requirement is not clear and would not appear to reflect the characteristics of the local area. This requirement also does not acknowledge scenarios where particular site characteristics and constraints may benefit from greater variety of 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 this requirement should be removed.

### ***GLEM3 Land West of Park Lane***

***Any planning applications 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.***

This requirement would appear to be at odds with Paragraph 200 of the NPPF (2023 version) which states that "The level of detail should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation". The policy should therefore recognise the need for a proportional response to potential archaeological interest and as a result, it is considered the current text should be replaced with the following:

~~'Any planning application(s) must be accompanied by an initial archaeological assessment, which would inform the need for any further archaeological investigation, in consultation with the Historic Environment team.'~~

On behalf of Rainier Developments Ltd, it is requested that the Examiner reviewing the Glemsford Neighbourhood Plan considers the abovementioned representations and makes the relevant suggested modifications to ensure that it complies with the necessary requirements. Crucially, the principle of a residential allocation on the site is supported, however we consider that it is important that the allocation allows for development of a sustainable scheme, which complies with national policy.

It is considered the policies described above should be either modified or deleted as set out within these representations to ensure a sound Neighbourhood Plan can be 'made' that will subsequently form a valuable part of the Development Plan for Glemsford, and that the homes and open space can be delivered in accordance with the principles and policy requirements contained within it.

Yours faithfully,

A handwritten signature in dark ink, appearing to read "C Mills", written in a cursive style.

Claire Mills  
Associate Planner

## (12) RESIDENT - NORTH

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent, please complete Part's A & B

Part A: Respondent	
Title / Name:	Ms North
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

## Section Two: Your comment(s)

Which part of the Plan does your comment relate? Use separate forms if necessary.

<b>Paragraph No.</b>	Appendix 3 Page 50	<b>Policy No.</b>	
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>		<b>Have Comments</b>	Yes

### **Please give details of your reasons for support / opposition / other comments:**

I support the Glemsford Neighbourhood Plan as it stands but with a new government plus devolution, I am very concerned that the powers that local communities thought they would have will be diminished quite considerably.

Appendix 3 Page 50: General design guidance for new development – Does the proposal positively integrate energy efficient technologies?

It has been disappointing to see that bungalows at the end of Chequers Lane, built within the last 3 years, do not have a single solar panel on any of the dwellings.

Please can these be prioritised in new builds plus the inclusion of Swift Bricks.

Thank you.

### **If seeking changes, what improvements or modifications would you suggest?**

Solar Panels and Swift Bricks

Note: If you are including additional pages these should be clearly labelled and referenced.

Normally, the appointed Examiner will consider all matters through the written representations. If necessary, they may hold a hearing [this may be a virtual meeting or a meeting held in person] to discuss a particular issue. If you consider that a hearing should be held, please explain why this is necessary.

The decision on whether or not to hold a hearing is entirely at the discretion of the Examiner.

### **I consider that a hearing should be held because ...**

*Please be as brief and concise as possible ...*

**Please indicate below** (use X, or type Yes) **if you wish to be notified by e-mail of:**

Our publication of the Independent Examiners Report on this plan	Yes
The 'making' (adoption) of the Glemsford NP by Babergh District Council	Yes

**Please sign and date your response** (a typed signature is acceptable)

<b>Signed:</b>	<b>Dated: 30.05.25</b>
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## (13) LANDOWNER - MURPHY

**Rec'd:** 19 May 2025  
**Subject:** Glemsford NP Consultation  
**Attached:** 01 Illustrative site plan (1).pdf

Dear Sir or Madam

As a landowner in Glemsford, I would like to submit a comment concerning one of the sites that was considered for potential housing, as there has been a development since the publication of the Site Options Assessment document in May 2020, which affects the way in which the site should be considered.

I believe my comment is relevant to the basic conditions tests of the NP, in that it relates to the achievement of sustainable development, conformity with the Babergh & Mid Suffolk Joint Local Plan, and national policy and guidance issued by the Secretary of State.

With reference to the document entitled Glemsford NP Site Options Assessment, I refer to Site 12 in the list on page 16 of the document, namely Land east of Brook Street and Chequers Lane. On page 23, within the Site Assessment Summary Table, Site 12 is described as Ref SS0257: Unsuitable SHELAA site. In the AECOM conclusions section, it states that the SHELAA gives no reason for designating the site unsuitable, other than citing a failed planning application in 2018, then goes on to state the following:-

"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."

I would like to bring it to the attention of all relevant parties that we do now have access available onto Brook Street from Site 12 via a collaboration with the Slater family who own the empty property at No. 28 Brook Street, known as Linden. The smaller area referred to in the above paragraph along with the "Linden" site was submitted in BMSDC's Call for Sites in January 2024, plan attached. [BDC note: This plan resized from A1 to A3 for inclusion in this document]

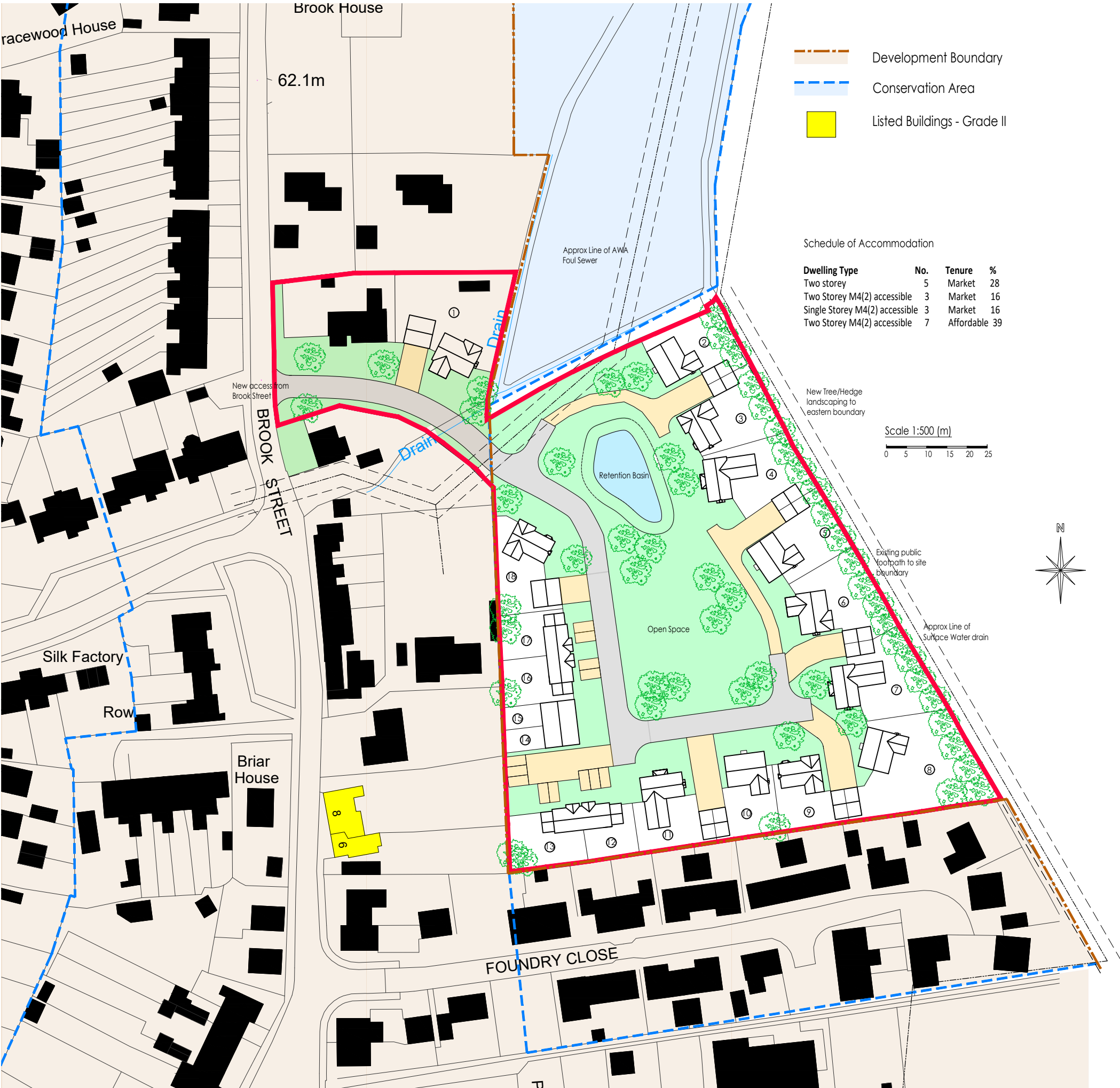
I did inform Glemsford PC that we do now have access onto Brook Street from Site 12, via email on 13th February 2024. I was informed by the parish clerk that the consultation period had closed, but that there would be further chances for consultation, hence my submission here.

I would also like to make the point that I believe, as landowners in the parish of Glemsford, effectively stakeholders, particularly as owners of one of the numbered sites under consideration, my cousin and I should have been contacted and included in the community engagement process. As it is, we only found out about the existence of a draft NP by coming across a leaflet in a shop, by which time the first consultation period had passed.

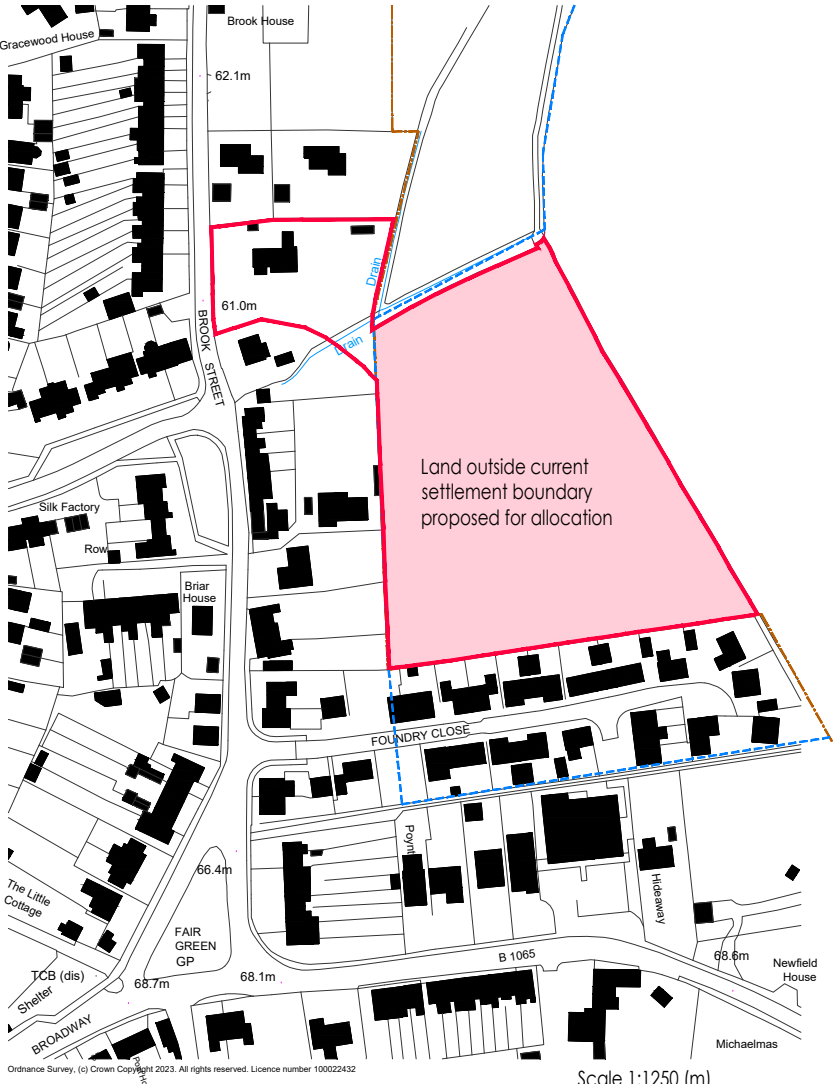
To summarise, I propose that the part of Site 12 to the west and north of Foundry Close with the land at No. 28 Brook Street, as per the attached illustration, should be included in the Housing Site Selection of the Glemsford NP.

Kind regards, Ms Murphy






BLOCK PLAN



LOCATION PLAN



**Whymark & Moulton**  
Chartered Surveyors &  
Building Engineers  
14 Cornard Road, Sudbury,  
Suffolk. CO10 2XA  
Tele: 01787 371371

Project

POTENTIAL RESIDENTIAL DEVELOPMENT LAND  
BROOK STREET  
GLEMSFORD

ILLUSTRATIVE PLAN

Scale 1:500, 1:1250, Date Jan 2024

Drawing No 24/004-01

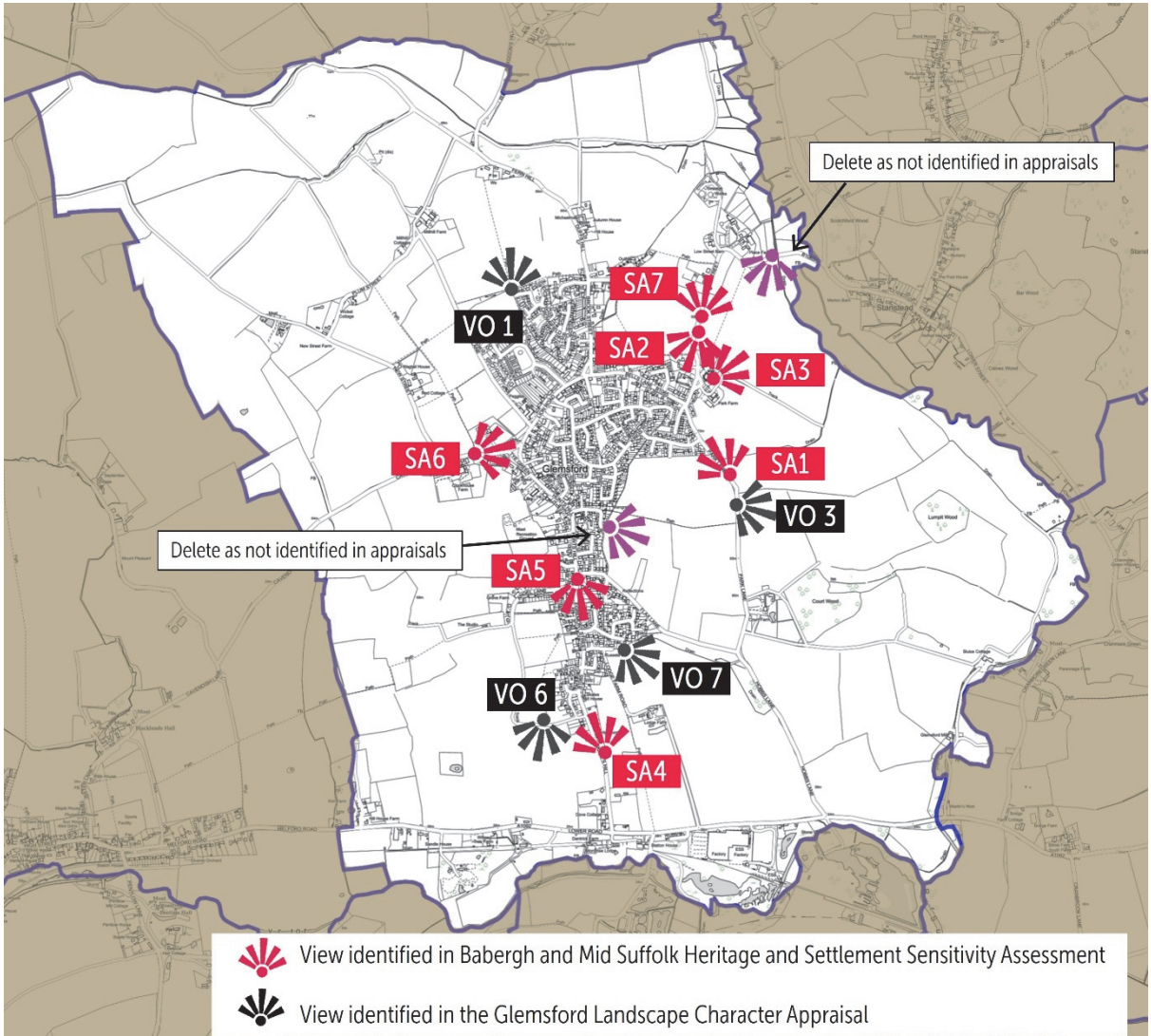
Amendments



## (14) Glemsford Parish Council

### Glemsford Parish Council response to comments submitted at Regulation 16 Consultation Stage

Body	Parish Council response
<b>Suffolk County Council</b> The County Council commented at Pre-Submission consultation stage	
<p>Policy GLEM 8 – Protection of Important Views</p> <p>The County Council identifies that the Plan and supporting evidence creates confusion, particularly that Map 7 illustrates 13 views whereas Appendix A of the Landscape Appraisal identifies 17.</p> <p>The County Council seeks clarification</p>	<p>Appendix A of the Glemsford Landscape Appraisal identified a number of views into the parish from outside the Neighbourhood Area. However, the Neighbourhood Plan cannot designate matters outside the Neighbourhood Area and so these are not designated in the Plan. This is noted in paragraph 9.12 of the Draft Plan.</p> <p>Likewise, Appendix A identifies views from inside the Neighbourhood Area to locations and features outside the parish. Given that the Plan cannot apply to decisions outside the Neighbourhood Area, these are also not designated in the Plan.</p> <p>As such, the Neighbourhood Plan identifies those views in Appendix A that are within the Neighbourhood Area and appropriate to protecting the character of the parish.</p> <p>Namely, with reference to Appendix A, these are: VO 1; VO 2*; VO5; VO 6; VO 7</p> <p>VO 2 is also identified on page 21 of the <a href="#">Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment Final Report - March 2018 – Appendix 1 – Babergh Assessments (March 2018)</a></p> <p>The above Babergh evidence report, also referred to in paragraph 9.12 of the Draft Plan, identifies 7 important views.</p> <p>There are tow errors on Map 7 in that views are marked that are not identified in either assessments.</p> <p>In order to resolve this confusion, the map below identifies the view references and the two views that should be deleted. The Examiner might like to consider that Map 7</p>

Body	Parish Council response
	is replaced to reflect the content of the map below.
	 <p>Map showing identified views in Babergh and Mid Suffolk. Views are marked with starburst icons: red for views identified in the Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment, and black for views identified in the Glemsford Landscape Character Appraisal. Views are labeled SA1 through SA7 and VO1 through VO7. Two callouts indicate 'Delete as not identified in appraisals' pointing to specific view locations.</p> <p>Legend:</p> <ul style="list-style-type: none"> <li>Red starburst icon: View identified in Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment</li> <li>Black starburst icon: View identified in the Glemsford Landscape Character Appraisal</li> </ul> <p>All rights reserved (AC0000851247) 2023. Contains OS data © Crown copyright and database right 2023</p>
<p><b>Policy GLEM 11 – Development Design</b></p> <p>The County Council seeks reference to the Suffolk Design: Streets Guide (2022) and Suffolk Guidance for Parking (2023) in the policy.</p> <p>The County Council identify other matters that are not of such significance to impact the examination, such as requests for a caption to a photograph, clarification in the Landscape Appraisal and clarifying that they</p>	<p>It is considered that sufficient reference to standards is already made within the policy without the potential to become out-of-date as and when guidance is updated.</p> <p>These matters that, as necessary, could be addressed in the Referendum version of the Plan without impacting the outcome of the examination.</p>

Body	Parish Council response
do not own the school playing field local green space.	
<b>Babergh District Council</b> The District Council commented at Pre-Submission consultation stage	
Policy GLEM 1 – Spatial Strategy The District Council suggests adding reference to Map 3 in the policy.	The Parish Council defers this decision to the Examiner to determine whether this is necessary.
Chapter 6 – Housing The District Council brings attention to the decision to prepare a new Joint Local Plan and the implications of the Government’s latest district level housing forecasts. Amendments are suggested to paragraphs 6.3, 6.4 and 6.5 and a correction to Policy GLEM 3.	Changes to the supporting paragraphs of the Plan can be made to bring the plan up-to-date post examination.
Chapter 8 – Employment A minor modification is suggested to Para 8.4	Changes to the supporting paragraphs of the Plan can be made to bring the plan up-to-date post examination.
Chapter 9 – Natural Environment The District Council makes reference to the difficulty in identifying views and references to the supporting evidence.  Other matters are raised in relation to the re-naming of AONB’s and the identification of Lumpit Wood County Wildlife Site.	These matters that, as necessary, could be addressed in the Referendum version of the Plan without impacting the outcome of the examination
Policy GLEM 10 – Local Green Spaces The District Council questions the status of LGS 9 in terms of use by the primary school and whether the Parish Council considers it currently meets the NPPF criteria	The space is still leased to the primary school and available for use as a playing field for the school.
Chapter 10 – Built and Historic Environment The District Council suggests a minor amendment to paragraph 10.9	This is a matter that, as necessary, could be addressed in the Referendum version of the Plan without impacting the outcome of the examination

Body	Parish Council response
Chapter 7 The District Council notes that there is no chapter 7	The chapter numbering can be addressed in the Referendum version of the Plan.
<b>Historic England</b> Historic England commented at the Regulation 14 consultation stage	
Historic England Having we do not consider it necessary to provide detailed comments at this stage.	Nothing further to add
<b>Natural England</b> Natural England were consulted but did not respond at the Regulation 14 consultation stage	
Natural England does not have any specific comments on this draft neighbourhood plan.	Nothing further to add
<b>Environment Agency</b> The Environment Agency commented at the Regulation 14 consultation stage	
The Environment Agency has no further detailed comments to make in relation to this plan.	Nothing further to add
<b>Anglian Water</b> Anglian Water commented at the Regulation 14 consultation stage	
Anglian Water has no further comments to add	Nothing further to add
<b>The Water Management Alliance</b> The Water Management Alliance commented at the Regulation 14 consultation stage	
The Water Management Alliance has no comments	Nothing further to add
<b>National Highways</b> National Highways (then known as Highways England) were consulted but did not respond at the Regulation 14 consultation stage	
National Highways state that the draft policies set out are unlikely	Nothing further to add

Body	Parish Council response
to have an impact on the operation of the A14 and National Highways offers no comment.	
<b>Sport England</b> Sport England were consulted but did not respond at the Regulation 14 consultation stage	
Sport England provide a generic response to the consultation but do not make any specific representations against the Draft Plan	Nothing further to add
<b>James Bailey Planning Ltd on behalf of Bloor Homes</b> James Bailey Planning Ltd were consulted did not respond at the Regulation 14 consultation stage	
<p>Bloor Homes consider that the draft Glemsford Neighbourhood Plan fails to contribute to sustainable development. This is because not all of the options have been fully or properly considered within the SEA, as a small portion of land west of Duffs Hill has only ever been considered. The two options explored through the SEA have led to the consideration of either: 1) piecemeal development through the allocation of three smaller sites; versus 2) one large single development to the south of the village. However, a larger site to the north (Land west of Duff Hill) could have been considered in accordance with the proposed Concept Masterplan (see Appendix 3 of our full representations).</p>	<p>The SEA was based on the known information that informed the preparation of the Plan. A call for sites was made early in the Plan preparation process and these sites were assessed for suitability in the Site Options Assessment (May 2020). At the time, the site identified west of Duffs Hill was that put forward in the 2020 Babergh SHELAA amounting to 4 hectares.</p> <p>When the pre-submission consultation was carried out in November 2023, Stantec submitted representations on behalf of Bloor Homes that identified the site west of Duffs Hill could deliver 100 homes. The representation submitted by James Bailey Planning includes that representation in Appendix 1. However, no evidence was submitted with the representation that identified the extent of the site or how it might satisfactorily be accessed. The Parish Council therefore had to rely upon the information made available through the Site Options Assessment.</p> <p>Accordingly, the SEA assessed sites that had been submitted and assessed in the Glemsford Neighbourhood Plan Site Options Assessment.</p>

Body	Parish Council response
	<p>While it is acknowledged that a larger site was put forward in the January 2024 Babergh Call for Sites, no assessment of the suitability of that site has been published by Babergh at the time of the examination of the Neighbourhood Plan. The first time that the proposed masterplan for the site has been seen through the neighbourhood plan statutory consultation process is at this Regulation 16 stage. It is therefore unreasonable to expect that the SEA should have taken into consideration the larger site at Duffs Hill.</p>
<p>Bloor Homes also considers that the draft Neighbourhood Plan also fails to have regard to National Policy and Guidance. This is because there is no clear justification for the proposed housing requirement figure, and the allocated site as currently proposed is at odds with the housing requirement figure, as the developer is promoting a development to double the housing requirement.</p>	<p>Given the strategic policy vacuum at the local plan level, there is no <u>minimum</u> housing requirement for Glemsford and therefore the allocation in the Neighbourhood Plan is in accordance with national and local policy. While it is recognised that the developer of the allocation is promoting to “double” the allocation, the NPPF advocates a plan-led system to growth, which is what the neighbourhood plan seeks to do.</p>
<p>Bloor Homes state that in light of the Government’s increased mandatory housing requirement, there is likely to be a significant increase in the housing requirement for Glemsford.</p> <p>The supporting statement refers to a Briefing Pack issued by the District Council in March 2025 “Planning for the Future in Babergh and Mid Suffolk Briefing Pack” which includes an indicative requirement for Glemsford of 600 dwellings over a 20-year period.</p>	<p>The Briefing Note was provided to Parish Councils at a meeting for Parish Councils in March 2025. The figures have no status whatsoever as they have not been tested through the local plan preparation process and do not reflect the sustainable distribution of housing growth across the district that would be expected through a settlement hierarchy in a local plan.</p>
<p>Bloor Homes suggest that the draft Neighbourhood Plan risks being in conflict with an emerging Local Plan, and contrary to the positive approach that the District Council is trying to take to meet Government housing targets.</p>	<p>The Neighbourhood Plan takes a positive approach to delivering housing in the lack of site allocations in the adopted local plan and given that the new local plan is not scheduled to be adopted until 2029.</p>
<p>Bloor Homes suggest “Rather than proceeding to referendum at this time, the Parish could make some</p>	<p>The Examiner will decide whether the Plan can proceed to referendum but the Parish Council is satisfied that the Plan as</p>



Body	Parish Council response
proactive steps to work closely with the new Joint Local Plan process, by identifying enough suitable sites to address the significantly increased indicative housing requirement figures provided by the District Council."	submitted meets the Basic Conditions and can, subject to any changes required by the Examiner, be considered at Referendum.
<b>Savills (UK) Ltd on behalf of Rainer Developments and Strategic Land</b> Savills submitted comments at the Regulation 14 pre-submission consultation stage	
<p>Policy GLEM 3- Land west of Park Lane</p> <p>The representation states that "there potentially is not sufficient evidence to support the cap of 100 dwellings" and that the allocation should not specify a fixed figure.</p> <p>An amendment is proposed to allocate the site for "approximately" 100 dwellings.</p>	<p>Evidence from community engagement demonstrates little support for development in excess of 100 homes in Glemsford. The policy reflects the sensitivities of the site and its surroundings, particularly its prominence within the landscape to the east. This is expressed in the Site Development Concept diagram in Figure 1 of the draft Plan.</p> <p>The suggested amendment to "approximately" 100 dwellings does not provide the positive planning guidance that is required in this situation given that there is no definition as to the number of homes in excess of 100 would be acceptable.</p> <p>The suggestion is not supported by the Parish Council.</p>
<p>Policy GLEM 3- Land west of Park Lane</p> <p>The representation seeks an amendment of the reference to Figure 1 in the policy which effectively waters down the purpose of the work to inform the Concept Diagram.</p>	<p>The suggested change that would require development to "have regard to the illustrative site Concept Diagram" does not provide a positive approach to guiding the development of the site as it would not identify criteria as to when the Concept Diagram requirements could be ignored.</p> <p>The suggestion is not supported by the Parish Council.</p>
<p>Policy GLEM 3- Land west of Park Lane</p> <p>The representation seeks an amendment to the requirements for archaeological investigations.</p>	<p>The criterion in the policy reflects that required by the County Council in their response to the Regulation 14 consultation.</p>

Body	Parish Council response
<p>The representation seeks changes to a number of the site development principles set out in paragraph 6.22 of the Plan.</p> <p>1 – to seek the removal of the phasing requirement due to lack of justification</p> <p>2 – to remove the requirement for a minimum of five hectares of green space</p> <p>3 – to remove the requirement for two multi-purpose futsal courts/ multi-use games areas</p> <p>4 – to amend the requirement that all buildings shall be of two storeys in height thereby enabling bungalows and 2.5 storey dwellings.</p> <p>5 – to remove the requirement that buildings should be arranged with their frontages perpendicular to the road line</p>	<p>The Parish Council does not support this. The number of dwellings in the parish has grown on average by 14 dwellings a year between 2001 and 2021. The development of 100 homes by 2031, given a likely start date of 2027, would represent an annual growth rate of 25 homes a year.</p> <p>The Parish Council does not support this. <a href="#">The Babergh and Mid Suffolk Open Space Assessment (May 2019)</a> identifies a shortfall in provision in allotments, amenity green space, parks and recreation grounds, and child and youth play amounting to 4.62 hectares based on the 2011 parish population. Given that the 2021 population had grown by around 300 with little in the way of additional provision, this deficit will have increased. The neighbourhood plan therefore provides a positive response to addressing this shortfall.</p> <p>For the same reasons as above, the Parish Council does not support this amendment.</p> <p>The Parish Council acknowledges that, as written, the principle would preclude the provision of bungalows and would support an amendment to allow such provision within the development should the Examiner consider it necessary.</p> <p>This principle has been informed by a design-led approach to the allocation and the Parish Council does not support this amendment.</p>
<p><b>Ms North</b> Ms North did not comment at the Regulation 14 consultation stage</p>	
<p>Ms North states that it has been disappointing to see that bungalows</p>	<p>The Neighbourhood Plan cannot require new homes to include solar panels. Policy</p>



Body	Parish Council response
at the end of Chequers Lane, built within the last 3 years, do not have a single solar panel on any of the dwellings and asks that these are prioritised in new builds plus the inclusion of Swift Bricks.	GLEM 9 supports the provision of Swift Bricks.
<b>Ms Murphy</b> A late representation was received by the Parish Council after the Regulation 14 consultation closed. It is referred to on pages 110-112 of the Consultation Statement.	
Ms Murphy seeks the allocation of site 12 in the Neighbourhood Plan Site Options Assessment as access issues have been overcome .	The Parish Council notes that the site submitted to Babergh DC as part of their call for sites in January 2024 does not include the land proposed for the access. As such there remains uncertainty as to the deliverability of the site at this time and is happy to leave it to the District Council to determine whether they wish to include the additional site in the new Local Plan.