

Note to Glemsford Parish Council

Neighbourhood Plan Examination

1. The draft Neighbourhood Plan was submitted to Babergh District Council in March. It was accompanied by a number of supporting documents. Before the Plan could be submitted, the Parish Council had to commission a full Strategic Environmental Assessment of the Plan as the "Screening Opinion" of the draft Plan commissioned by Babergh District Council concluded that "the Glemsford Neighbourhood Plan has the potential to have significant environmental effects and that SEA [Strategic Environmental Assessment] is therefore required." This delayed the submission of the Plan and the SEA was prepared for the Parish Council as part of the (then) free technical support for preparing neighbourhood plans provided by the Government.
2. A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Neighbourhood Plan. To inform the selection of reasonable alternatives, the SEA used the outcomes of the Site Options Assessment (SOA) prepared for the Neighbourhood Plan. It assessed the suitability and deliverability of eleven sites put forward by developers or landowners through an earlier "call-for-sites" process conducted by both Babergh District Council and, later, by the Parish Council to identify what land might be available for housing development as illustrated on the extract from the SOA below.

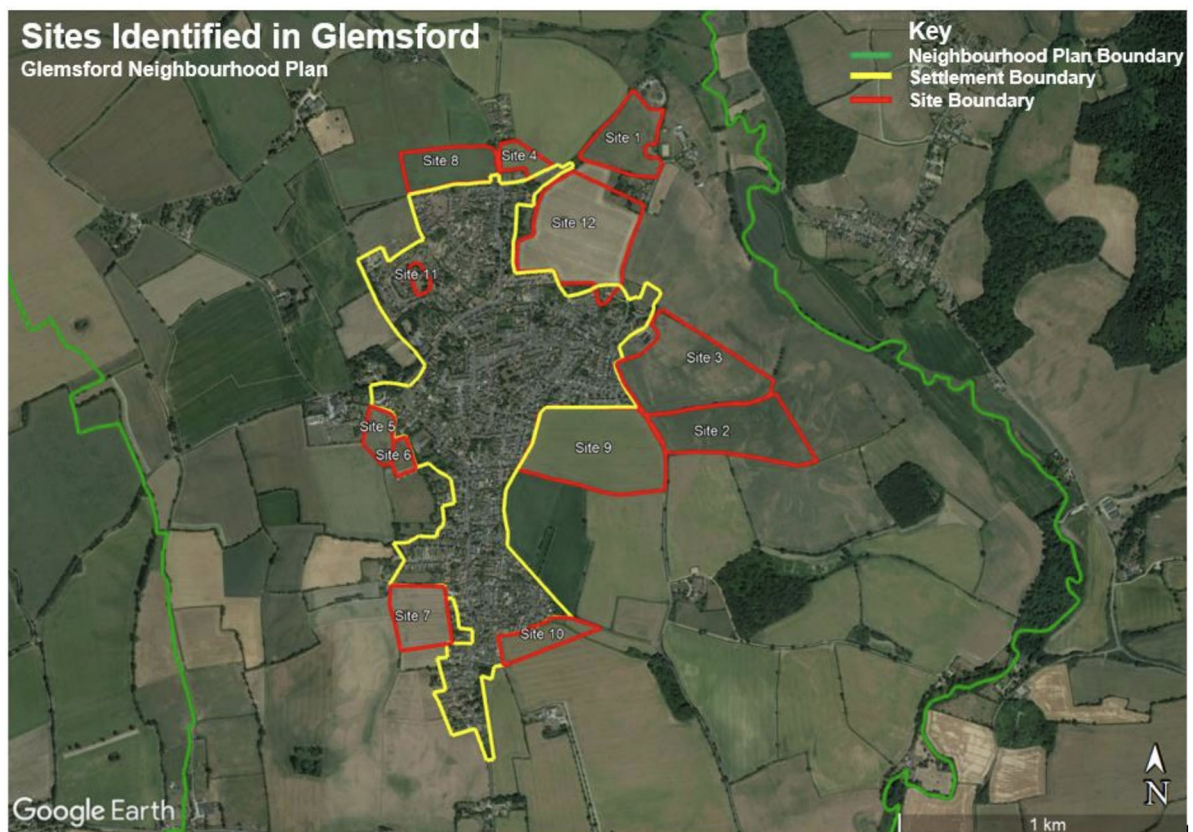


Figure 4-1 Sites identified in Glemsford

3. Four sites were found to be suitable for development and referred to in the SEA report:

- Site 1 (Site 4 of the SOA): Land east of Duffs Hill (25-30 homes)
- Site 2 (Site 8 of the SOA): Land west of Duffs Hill (10 homes)
- Site 3 (Site 9 of the SOA): Land west of Park Lane (100 homes)
- Site 4 (Site 10 of the SOA): Land south-east of George Lane (20-30 homes)

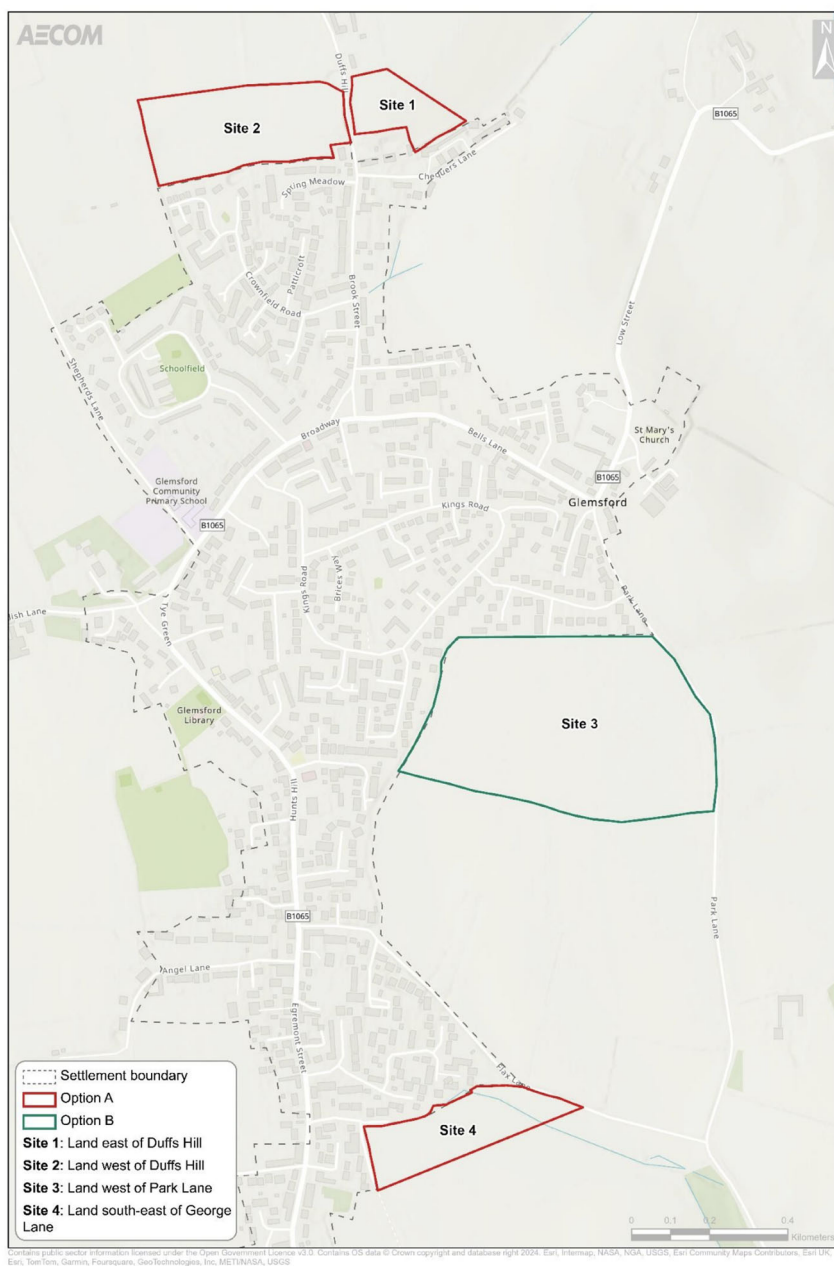
For the purposes of the SEA and investigating reasonable alternative, the sites were split into two options.

Option A – Sites, 1, 2 and 3 – which combined could provide around 70 homes based on the information available at the time,

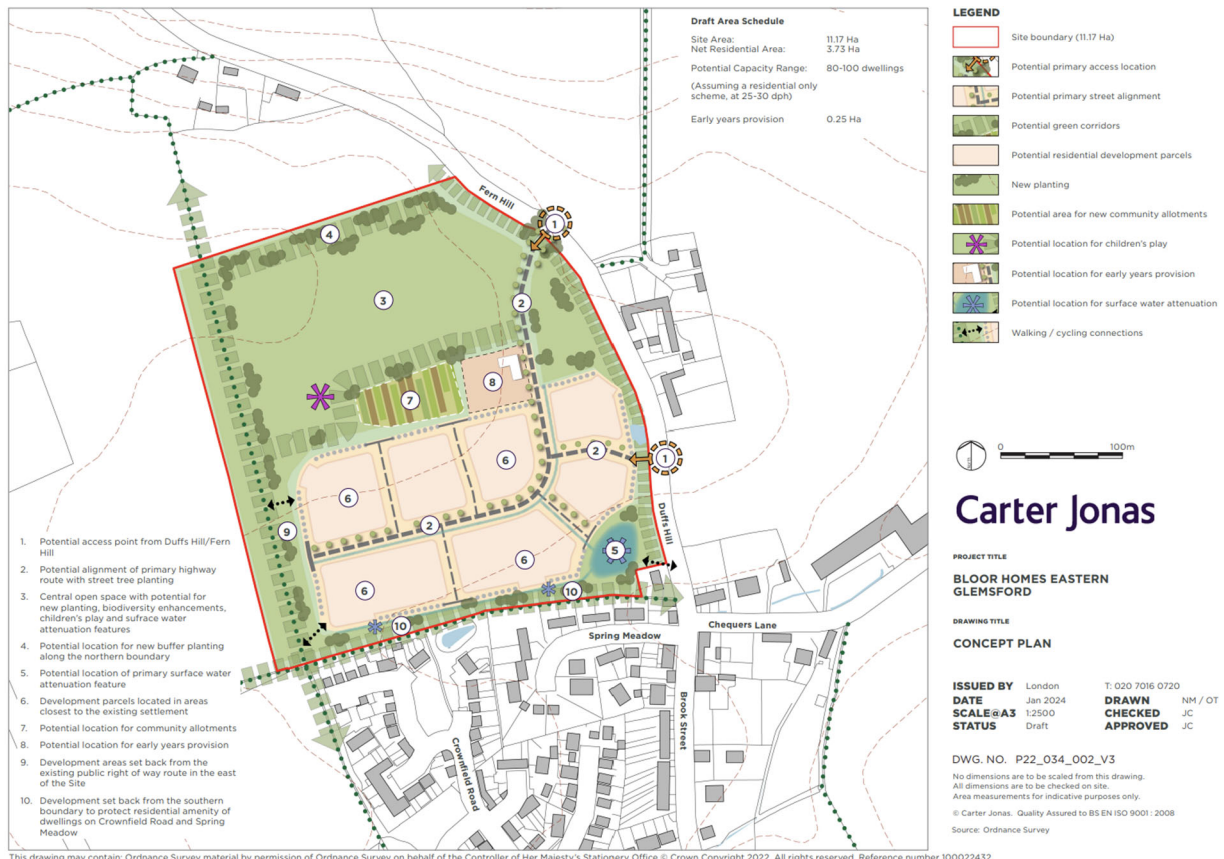
Option B – Site 3 (the Neighbourhood Plan site which is allocated for 100 homes)

The sites are illustrated on the extract from the SEA report below.

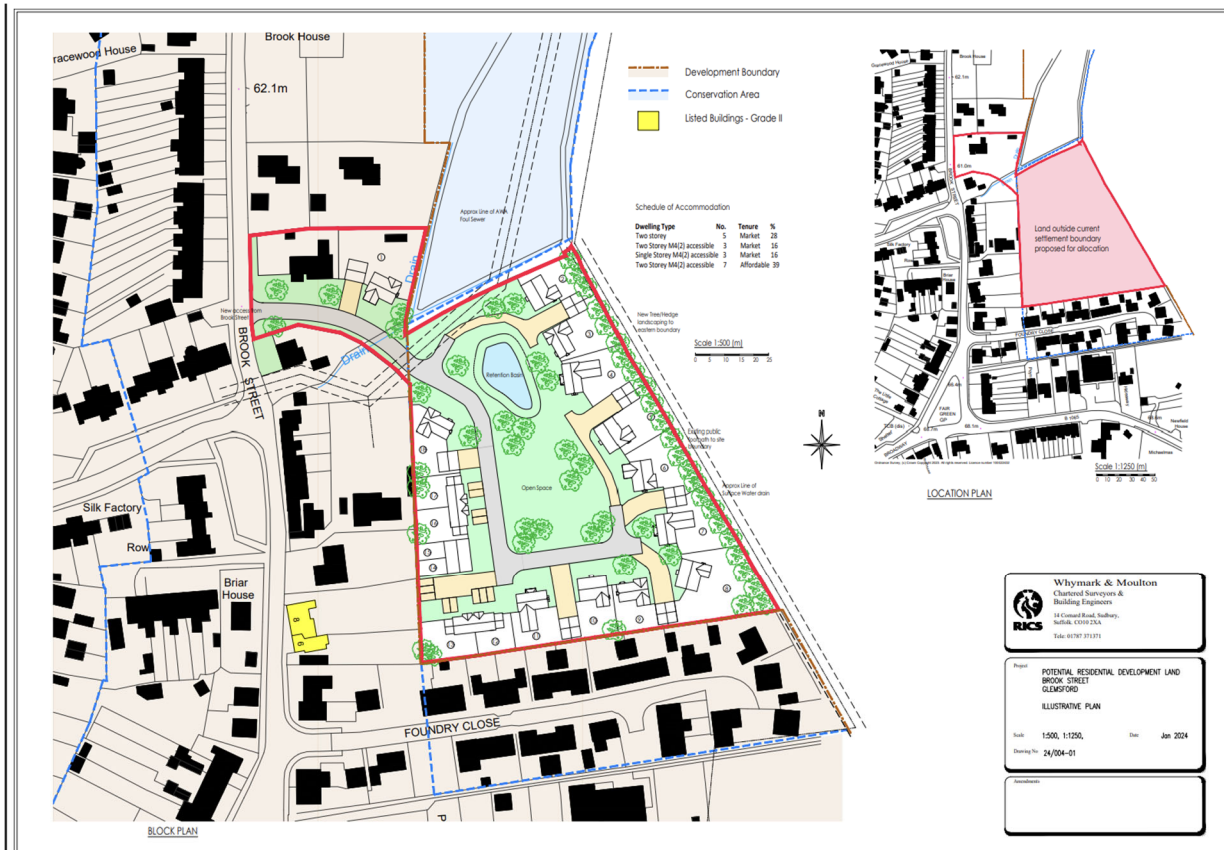
Figure 4.1 Reasonable alternative site options



4. When the Parish Council carried out public consultation on the Plan, Bloor Homes submitted comment to state that they could develop 100 homes on their site west of Duff's Hill (Site 2). However, no plan was submitted to identify the extent of the site and it was assumed that it corresponded to the site originally assessed. A late representation from Ms Murphy identified that a smaller area of Site 12, with access onto Brook Street had been submitted to Babergh as part of their "call-for-sites" to inform the new Local Plan.
5. During the course of Summer 2024, Bloor Homes' agent wrote to the Parish Council promoting a larger site west of Duffs Hill and seeking a meeting with the Council. Place4People advised that it would not be appropriate to take into account the promotion outside a formal consultation stage of the Neighbourhood Plan as it would be deemed to show favour to a developer over and above others. A similar approach was made by Ms Murphy promoting a smaller site 12 in February 2024 and the advice was the same.
6. When the SEA was finally completed by AECOM, the Neighbourhood Plan was finalised, along with the supporting documents, and the Plan was formally "submitted" to Babergh.
7. Babergh District Council consulted on the draft Plan between 9 April and 30 May. Comments were received from the following and are published on the neighbourhood plan page of Babergh's website:
 - Suffolk County Council
 - Babergh District Council
 - Historic England
 - Natural England
 - Environment Agency
 - Anglian Water
 - Water Management Alliance
 - National Highways
 - Sport England
 - James Bailey Planning Ltd (obo Bloor Homes)
 - Savills (UK) Ltd (obo Rainier Developments and Strategic Land)
 - Resident – Ms North
 - Landowner – Ms Murphy
8. The Bloor Homes submission included the following plan.



The Murphy submission included the following plan:



9. The independent examination of the Neighbourhood Plan was commenced in July. The Examiner asked the District Council and Places4People to provide a timeline for how the SEA was prepared to help her understand whether it had taken into account all reasonable alternatives.
10. The Examiner has now issued an open letter identifying that, in her opinion, "Site 2 should have been considered as a further reasonable alternative as a possible site to provide up to 100 dwellings, even though I appreciate that limited information had been provided."
11. The Examiner considers that the small area of Site 12 "should have been part of a package of small sites considered as a reasonable alternative" and further states "Given that the SEA Environmental Report does not comply with legal requirements, there are no modifications I can recommend remedying this circumstance. Unfortunately, this requires the SEA process to be revisited to meet these Regulation requirements."
12. The Examiner is providing the Parish Council with an opportunity to:
 - a. "prepare a revised SEA Environmental Report [as an addendum] including Site 2 as a reasonable alternative with a capacity of up to 100 dwellings and the small area of Site 12, as part of a package of small sites, as a reasonable alternative."
 - b. "consider whether it wishes to withdraw the submission Plan from examination or whether I continue with the examination with the understanding that I will recommend the Plan does not proceed to referendum."

WAY FORWARD

13. Given that the Government's Grant Programme to support neighbourhood planning, including the SEA, has now been withdrawn, the Parish Council does not have the ability to apply for the addendum to be carried out for free by AECOM. Places4People have contacted AECOM to ask how much it would cost but they are not in a position to open a contract for such a relatively small piece of work. Places4People have also spoken to the manager at Locality, who managed the grants on behalf of the Government, and he has suggested that we contact him in early September as he is hopeful that some support can be made to those parish councils in a similar position.
14. It is clear that, whatever the situation, the Plan cannot proceed until this work is done. It is difficult to gauge what the cost might be at this time, but Places4People continue to explore cost effective options. We do not have the in-house expertise to do it ourselves. Assuming that the addendum can be prepared in the coming months at a reasonable cost, that addendum would probably need to be the subject of focused consultation by Babergh DC before the Plan and amended supporting documents could be re-submitted to the Examiner. This will very much depend upon the outcomes of the additional SEA work.

15. In the meantime, it is clear that the Plan in its current form cannot complete the examination stage. We would therefore **recommend to the Parish Council that the Neighbourhood Plan is withdrawn from examination.**
- 16 Places4People remain committed to supporting the Parish Council to deliver the neighbourhood plan to referendum.

Ian Poole
Managing Director
Place4People Planning Consultancy

11 August 2025