



Bures Neighbourhood Plan 2021 – 2037

Examination Stage Focused Consultation responses

Covering the parishes of Bures St Mary (in Suffolk) and Bures Hamlet (in Essex), the submission draft Bures Neighbourhood Plan has been undergoing independent examination.

Two parts of the Levelling-up and Regeneration Act (LURA) 2023 came into immediate force on 25 March 2025. These are Sections 98 and 99. The former amends the Planning and Compulsory Purchase Act 2004 by introducing new legal compliance matters relating to climate change and taking account of local nature recovery strategies. The latter amends the Town and Country Planning Act 1990 by replacing the 'general conformity' basic condition with a new requirement that 'the making of the plan would not result in less housing development taking place in its area if was not made'.

Because the Bures Neighbourhood Plan was still at examination on 25 March, a focused consultation exercise was undertaken on whether or not these new provisions have any implications for the Bures Neighbourhood Plan. The exercise ran from 11 May until 29 May 2026. Six representations were received. They are listed below and copies are attached.

Ref No.	Consultee
(1)	Bures Hamlet Parish Council
(2)	Suffolk County Council
(3)	Babergh District Council
(4)	Environment Agency
(5)	National Highways
(6)	Sport England

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(1) Bures Hamlet Parish Council

E from: Bures Hamlet Parish Council
Cc to: Bures St Mary Parish Council
Rec'd: 19 May 2026
Subject: Bures Joint Neighbourhood Plan - new legal requirements and new basic condition test

Dear Community Planning

I refer to the Bures Neighbourhood Plan - notice of new focused consultation 11th to 29th May 2026.

Bures Hamlet Parish Council held its parish council meeting yesterday evening and unanimously agreed to respond to the consultation as follows:

It fully recognises the importance of addressing Climate Change and the related environment and wildlife issues. Therefore it fully supports bio-diversity net gain.

Referring to development in the village. The Parish Council welcomes development which is in keeping with Bures being at a crossing point on a bend in the River Stour with raised land all around.

Regards

Mrs Jenny Wright

Clerk to Bures Hamlet Parish Council

Clerk@BuresHamlet-pc.gov.uk

<http://bureshamlet-pc.gov.uk/>

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(2) Suffolk County Council

Date: 21st May 2026
Enquiries to: Busranur Serin
Tel: 01473 265631
Email: neighbourhoodplanning@suffolk.gov.uk



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

Sent via email: communityplanning@baberghmidsuffolk.gov.uk

Dear Paul Bryant,

Bures Neighbourhood Plan - Focused consultation for new Basic Condition test

Thank you for consulting Suffolk County Council (SCC) on the Focused Consultation on new legal requirements and a new basic condition test for the Bures Neighbourhood 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 1990, amended in accordance with Section 99 of the Levelling Up and Regeneration Act 2023. 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,
- d) the making of the neighbourhood plan contributes to the achievement of sustainable development,
- e) the making of the neighbourhood development plan would not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made, and
- f) the making of the neighbourhood plan does not breach and is otherwise compatible with, assimilated obligations, any requirements imposed in relation to the order by or under Part 6¹ of the Levelling-up and Regeneration Act 2023 (environmental outcomes reports) have been complied with.

SCC notes the context and clarifications made in the Bures NDP Examiner Explanatory Note. SCC has no further comments at this time, other than those already submitted at Regulation 16 stage, and wishes to be updated as this plan progresses.

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

¹ <https://www.legislation.gov.uk/ukpga/2023/55/part/6>

(3) Babergh District Council

Ref: Bures NP Focused Consultation

Dated: 29 May 2026

From: Planning Policy Team, Babergh District Council

To: Ann Skippers (Independent Examiner)

Sent by e-mail

Dear Ann,

- **Bures Neighbourhood Plan 2021 - 2037**
- **Focused consultation on implications of Sections 98 and 99 of the LURA 2023**

This response is made for and on behalf of Robert Hobbs (Head of Strategic Planning - Planning Policy and Infrastructure, Babergh & Mid Suffolk District Councils). An earlier draft had been shared with Braintree District Council for their information and comment.

Your Explanatory Note dated 1 May 2026 sets out details of the new legal compliance and new basic condition requirements for neighbourhood plans that were introduced by the provisions of Sections 98 and 99 of the Levelling Up and Regeneration Act (LURA) 2023. It also explains that these came into immediate force on 25 March 2026 and that it would now be prudent to now consider the Bures NP against these matters before you can issue a final report.

The Bures NP sets out twenty-four policies grouped under the broad themes of landscape, community, recreation, housing need, historic environment, *and* sustainable travel and movement. **Our overall conclusion is that the Bures NP is either ‘neutral’ or ‘broadly positive’ if now assessed against these new legal compliance and basic condition matters.** Our specific observations are set out below:

Q: Does the Bures NP contribute to the mitigation of, and adaption to, climate change?

- The ‘Vision for Bures’ includes a desire to value, protect, and enhance the natural setting of the River Stour. It also sets out that the two communities (Bures Hamlet, and Bures St Mary) will “*embrace green technical innovation to address and protect against the impacts of climate change*”
- Policies BP6 and BP7 seek to protect, respectively, local valued trees (as well as other trees and hedgerows), and local green spaces. Supporting text to Policy BP6 (para 84) explains how the local abundance of trees is one the villages greatest assets and that these provide a range of environmental benefits, including shading and cooling. Supporting text to Policy BP7 (para 94) links green infrastructure to helping protect urban and rural areas against the impacts of climate change.



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

- Local flood risk is clearly linked to climate change [Bures NP Objective, page 45] and the 'Climate Change and Flooding' chapter. Policy BP10: Flood Risk Management is positively worded to deliver development that manages surface water run-off.
- Policy BP17: Community Led Development offers general support for, amongst other things, renewable energy generation proposals.
- Policy BP19: Design encourages new developments to embrace opportunities to deliver a range of climate change adaptation measures including decentralised energy systems powered by renewable or low carbon sources.
- Policy BP23 promotes sustainable modes of transport.

Q: Does the Bures NP take account of any local nature recovery strategy that relates to all, or part, the neighbourhood plan area?

- Two Local Nature Recovery Strategies (LNRS) are relevant to the Bures NP area; the Essex LNRS, and the Suffolk LNRS. Representations made at the Reg 16 consultation stage seek amendments to paragraph 82 of the Plan so that mention is now made of the former, and that text relating to the latter is brought up to date.
- The Bures NP starts with a comprehensive section on 'Landscape'. Particular mention is made of the Dedham Vale National Landscape and the Stour Valley Project Area (Policy BP1), the habitat benefits of the rural lanes (Policy BP2), and the key landscape views (Policy BP3).
- The next section of the Plan covers the 'Natural Environment, Biodiversity and Wildlife'. It is here that we find paragraph 82 mentioned above. Policy BP4 seeks to deliver measurable net biodiversity gains. Policy BP5 focuses on delivering improvements to and additional links between identified green and blue corridors. Policies BP6 and BP7 have already been mentioned in relation to their role helping to address climate change. These trees, hedgerows, and other green spaces have an equally important role in nature recovery. Policies BP8 focus on the blue corridor; the River Stour, and in particular measures that would not see a further deterioration in water quality. Finally, Policy BP10 encourages development proposals to manage flood risk, including through the use of sustainable drainage systems that in turn offer other biodiversity benefits.
- At Policy BP19: Design, elements of this seeks to protect, retain and enhance existing landscape features and integrate new trees and vegetation to deliver net biodiversity gains.

Q: Would the making of the Bures NP result in less housing taking place in the area than if the Plan were not to be made?

- While the Bures NP does not allocate sites for new housing development neither does it specifically prevent such proposals from coming forwards. Supporting paragraph 158 leaves decision making on where new housing might be delivered in Bures to the two local planning authorities (Babergh and Braintree) but goes on to explain that the NP itself has a role to play in guiding what types of homes come forward.

- Following on from the above, Policy BP14: Housing Mix is supportive of new housing that contributes positively towards meeting identified local needs, while Policies BP16 and BP17 provides a positive approach to the delivery of affordable housing that helps meet identified local needs.
- Policy BP18: New Housing Development is positive towards the delivery of new housing within the two defined settlement boundaries or outside of these where the proposal is in accordance with national, district level, and other relevant policies contained in the neighbourhood plan.

Separate to the above, your Explanatory Note also refers to a further Basic Condition related to the new environmental assessment framework but then goes on to say that until such time as a completed framework for the implementation of Environmental Assessment Reports is in place, compliance with this condition cannot be assessed.

We trust that these observations are helpful.

Yours sincerely,

Paul Bryant
Neighbourhood Planning Officer | Planning & Building Control
Babergh & Mid Suffolk District Councils – Working Together
T: 01449 724771 / 07860 829547
E: communityplanning@baberghmidsuffolk.gov.uk

(4) Environment Agency

Paul Bryant
Babergh District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Ref: AE/2026/131346/OT-01/SB1
Date: 20th May 2026

Dear Paul,

Bures Neighbourhood Plan - Update and notice of new focused consultation

Thank you for consulting us on the updated Basic Conditions statement in support of Bures Neighbourhood Plan. We have reviewed the Basic Conditions Statement Addendum (April 2026) and can confirm that we have no further comment to make.

We trust that this advice is useful.

Yours sincerely,

Miss Emily Halliwell
Sustainable Places - Planning Advisor

Team e-mail: Planning.Eastanglia@Environment-agency.gov.uk
Team number: 02084 745242

Our ref: NH/26/16204
Your ref: Bures N'hood Plan – Update and New Basic
Conditions Test Consultation

Dr Shamsul Hoque
Assistant Spatial Planner
National Highways
Spatial Planning
Operations (East)
Woodlands, Manton Lane
Bedford MK41 7LW

Bures Consultation
c/o The Planning Policy Team

Babergh District Council
&
Braintree District Council

22 May 2026

Via email to: communityplanning@baberghmidsuffolk.gov.uk
&
planningpolicy@braintree.gov.uk

Dear Sir/Madam,

**BURES NEIGHBOURHOOD PLAN
UPDATE AND NOTICE OF NEW FOCUSED CONSULTATION
NOTICE OF FOCUSED CONSULTATION ON NEW LEGAL
REQUIREMENTS AND A NEW BASIC CONDITION TEST**

Thank you for your correspondence, received on 08 May 2026, notifying National Highways of the above consultation.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of State. Within and surrounding the Bures Neighbourhood Plan area, National Highways has responsibility for the A12 trunk road, which form part of the Strategic Road Network.

Bures Hamlet and Bures St Mary are jointly covered by a Neighbourhood Development Plan (NDP). The proposed neighbourhood plan area is situated some distance from the nearest Strategic Road Network (A12).

National Highways have submitted our comment during Regulations 14 and 16 stages previously. With this current focus consultation on the Independent Examination of the Bures Neighbourhood Plan Implications of Sections 98 and 99 of the Levelling Up and Regeneration Act (LURA) 2023, National Highways do not have any comment to add.

In relation to the new Basic Conditions, National Highways recognises that this requirement is intended to ensure that neighbourhood plans support the delivery of housing needs and do not undermine the strategic housing objectives established within the wider development plan.



Please contact PlanningEE@nationalhighways.co.uk should you require any further clarification.

Yours faithfully,

S. H.
Dr Shamsul Hoque
Assistant Spatial Planner

(6) SPORT ENGLAND

E from: Sport England
Rec'd: 14 May 2026
Subject: Neighbourhood Plan

Note: Sport England's e-mail received on 14 May did not specify which neighbourhood plan consultation it related to. This was queried and in response we are advised that: *"This representation relates to the consultation on the draft Bure's Neighbourhood Plan. It is our standard response to consultations regarding Neighbourhood Plans."*

* * * *

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 Parts 103 and 104. 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

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

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Part 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>

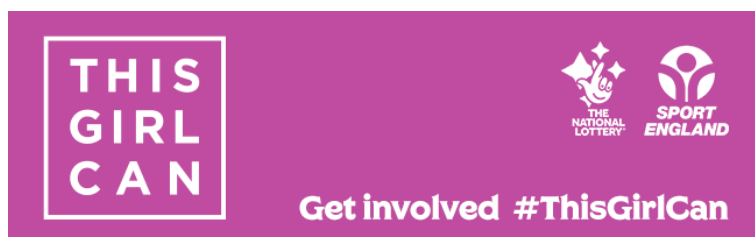
(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

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



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](#)