

Suffolk Coastal ... where quality of life counts

# Urban Capacity Study Up-date to 31<sup>st</sup> March 2007

# Suffolk Coastal District Council

#### Introduction - Purpose and Background of the Study

Urban capacity studies are a key component of the planning for housing process The studies are a tool for identifying potential brownfield housing opportunities within defined built up areas, be they towns or larger villages. As such they are a key part of a Local Planning Authority's assessment of housing land supply within its area, and of meeting the government objective of making best use of previously developed land. How these studies are undertaken and the sources of potential to be considered are contained in national advice and guidance. Most recent guidance is contained in Planning Policy Statement 3 – Housing (PPS3) and associated "Draft Practice Guidance Housing Land Availability Assessments: Identifying appropriate land for housing development". Relevant paragraphs from PPS3 state:

"A key objective is that Planning Authorities should continue to make effective use of land by re-using land that has been previously developed.

The national annual target is that at least 60 per cent of new housing should be provided on previously developed land. This includes land and buildings that are vacant or derelict as well as land that is currently in use but which has potential for redevelopment. When identifying previously-developed land for housing development, Local Planning Authorities and Regional Planning Bodies will, in particular, need to consider sustainability issues as some sites will not necessarily be suitable for housing."

In developing their previously developed land strategies, Local Planning Authorities should consider a range of incentives or interventions that could help to ensure that previously-developed land is developed in line with the trajectories. This should include:

- Planning to address obstacles to the development of vacant and derelict sites and buildings, for example use of compulsory purchase powers where that would help resolve land ownership or assembly issues.
- Considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing developments.
- Encouraging innovative housing schemes that make effective use of public sector previously-developed land."

This latest draft guidance takes on board lessons learned from the first round of urban capacity studies of which Suffolk Coastal's 2004 Urban Capacity Study was one. In particular, the revised guidance allows Local Planning Authorities to take a more pragmatic approach to the identification of sites where clear lessons can be learned from the earlier studies.

This 2007 Urban Capacity Study up-dates and replaces the earlier urban capacity study undertaken by the Council in 2004. As with the earlier study, the 2007 Study, has been prepared on the basis of a methodology produced by a joint working group of Suffolk local planning authorities set up to support the 2004 studies. Where necessary however, the methodology has been adapted to take on board updated policy advice and guidance. Where the 2007 study deviates from the original study methodology this is clearly spelt out in the text, including an explanation as to why the change was considered necessary.

The revised approach to the updated study (as noted through this document) was agreed jointly with Ipswich Borough Council and following invitation of comments from Babergh and Mid Suffolk District Councils. The reason for this is that The Ipswich Policy Area (IPA) is a planning policy sub-region with its own housing requirement, that comprises land within each of the Council areas referred to as well as part of Suffolk Coastal district area. In addition the need for an agreed joint approach was considered important for the following reasons:

- Ipswich Borough Council were updating their own urban capacity study to the same timescale as that of Suffolk Coastal: and
- Part of Suffolk Coastal lies within the Ipswich Policy Area, for which a joint Housing Market Assessment was also being undertaken. A consistent approach to all aspects of housing policy and particularly the evidence base was considered important in meeting the Local Development Framework (LDF) test of soundness.

The updated Study results will therefore be used to inform both the preparation of the Local Development Framework for the district, and the determination of individual planning applications.

On a cautionary note, it is accepted that the scope of Urban Capacity Studies such as this are limited from the outset in that:

- The yield for specific sites may be different when a more thorough examination of the site takes place and developments are designed;
- It only considers the potential capacity in "sustainable settlements".
- It is acknowledged that other sites in existing uses within the "sustainable settlements" and potentially elsewhere within the district may well come forward for development during the study period, but their release for housing is not possible to predict precisely. This "windfall" element will be over and above the identified urban capacity estimate.

Notwithstanding these limitations, urban capacity studies can be seen to play an important role in meeting the housing needs of their areas.

#### The Study

This Study has been undertaken In line with the (then) DTLR (now CLG – Department for Communities and Local Government) Good Practice Guide Tapping the Potential - Assessing Urban Housing Capacity, towards better practice (2000)) (TPP). This methodology sets out a logical, staged approach, to the identification of urban development potential as follows:

#### THE METHODOLOGY

Stage 1 -Identify Areas of Study

Stage 2 -Identify Potential Sources

Stage 3 - Survey the Capacity

Stage 4 - Assess the Yield

Stage 5 - Discount

Stage 6 - Assess Selective Market Viability

Stage 7 - Final Results

#### Stages 1: Identifying Areas

The first stage in assessing "urban" housing capacity was to identify the geographic extent of the study i.e. which settlements were to be included in the study. TTP states that "a useful rule of thumb is to include those settlements that may be considered for housing development." It was assumed that "urban" embraces all settlements that can contribute to sustainable patterns of development. The 2004 study therefore included all urban areas within the district and "sustainable villages" as defined by Suffolk Structure Plan Policy CS3 (a) - (e) and in policy SS4 of the Regional Spatial Strategy – the East of England Plan (the RSS) The RSS is due to supersede the Structure Plan when it is adopted in 2007/8. It states:

"The RSS seeks to locate the majority of new development in and adjacent to the Key Centres for Development and Change, and to protect the quality and character of the region's rural areas. However, within that broad approach, policy SS4 recognises the role of market towns and larger villages in providing employment and services to their rural hinterlands and meeting housing needs.

Key service centres are large villages with a good level of services which might include:

- A primary school within the settlement and a secondary school within the settlement or easily accessible by public transport;
- Primary health care facilities;
- A range of retail and service provision capable of meeting day-to-day needs, in particular for convenience shopping;
- Local employment opportunities; and
- Frequent public transport to higher order settlements.

.....Careful examination of how a settlement or groups of settlements function is required, as well as an analysis of the service base, to determine the best solutions for each area."

This updated study differs from the original 2004 study in two respects. Firstly, the numbers of settlements identified for study was extended to include all of those identified in the two settlement hierarchy options consulted upon under the Core Strategy Issues and Options consultation (February/March 2007), to ensure that whichever option was finally chosen, the evidence base would be available.

This 2007 Study therefore covers the market towns of Aldeburgh, Felixstowe, Framlingham, Leiston, Saxmundham and Woodbridge(with parts of Melton and Martlesham). It also includes the predominantly urban section of the Ipswich Policy Area, comprising the whole of the parish of Purdis Farm, substantial parts of Martlesham and Rushmere St Andrew; and the now town of Kesgrave.

The following villages were also assessed. Those marked with an \* are in addition to the 2004 Study area.

Grundisburgh; Hollesley; Martlesham; Melton; Peasenhall; Snape; Trimley St Martin; Trimley St Mary; Wickham Market; Yoxford.

Alderton\*; Blythburgh\*; Bramfield\*; Dennington\*; Earl Soham\*; Eyke\*; Kirton\*; Knodishall\*; Orford\*; Otley\*; Rendlesham\*; Ufford\*; Westleton\*; Witnesham\*.

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<sup>&</sup>lt;sup>1</sup> Policies adopted as at 31/3/07

It should be noted that areas of search within each of these settlements was restricted to land within the built up area boundaries as currently defined in the adopted Suffolk Coastal Local Plan (incorporating 1<sup>st</sup> and 2<sup>nd</sup> alterations) 2001, with one exception. The exception related to land allocated for housing but not included within the built up area boundary limits of the town.

It is acknowledged that the built up area boundaries for all settlements will be re-assessed in the emerging Local Development Framework. The implications any such boundary changes may have on the results of this study will be for the Council to take a view of in due course through its work on the Core Strategy and Site Specific Allocations Development Plan Documents.

The second change from the 2004 study is that a revised site size threshold was adopted. The original study only looked to identify those sites capable of accommodating 10 or more units. This size threshold was rejected for the purposes of this study for two reasons:

- The results would not accurately reflect the level of potential provision available; and
- A smaller site threshold would help to provide a more accurate picture of the numbers of sites where affordable housing could be expected to be provided. The Council's affordable housing policies were only adopted in March 2006, (Suffolk Coastal Local Plan 2nd Alterations) so were not applicable at the time of the original study. This refers to six or more units within or on the edge of towns and 3 or more units at villages.

#### **Stage 2: Identifying Potential Sources of Capacity**

The guidance in TPP states that it is important that appraisals consider as many sources of capacity as possible, no matter how unlikely some sources and locations may initially appear in terms of the current housing market. This stage involved identifying all the potential sources of capacity to be assessed within those settlements identified under Stage 1. Eleven sources of capacity are set out in TTP:

- 1. Subdivision of existing housing
- 2. Flats over shops
- 3. Previously developed vacant and derelict land and buildings
- 4. Intensification of existing areas
- 5. Redevelopment of existing housing
- 6. Redevelopment of car parks
- 7. Conversion of commercial/industrial buildings
- 8. Review of existing housing allocations
- 9. Review of existing other(non-residential) allocations
- 10. Vacant land not previously developed; and
- 11. Empty homes.

The Suffolk methodology identified a further 9 sources

- 12. Lapsed planning permissions (over the past 5 years)
- 13 National Land Use Data-Base (NLUD) type "e" sites (sites currently in use but with potential to be included as a source of capacity where there had is a reasonable expectation that the site would be converted to housing
- 14. Green Space
- 15. Transport land and buildings
- 16. Utilities land and buildings
- 17. Institutional (residential and non-residential) land and buildings

- 18. Government land and buildings
- 19. Community buildings
- 20. Minerals and waste land; and
- 21. Agriculture and forestry land

For the 2007 Study, it was considered that sources 12–21 were unnecessarily detailed and with the exception of 20 and 21 could be taken on board under the more general headings set out in TPP. With regard to minerals and waste land and agriculture and forestry, these are not considered to be previously developed land using the definition in PPS3, nor were they likely to be found within the physical limits boundaries as currently identified.

Regard was also had to the advice relating to Housing Land Assessments and Housing Land Supply, which identified unimplemented planning permissions as potential sources of supply. The following Table indicates the relationship between the urban capacity study work and the wider housing land availability assessment. The source types listed reflect those used in the Study.

#### **Identifying Sources of Supply**

Source: 2004	Source	Source: 2007
Tapping the Potential + Suffolk Methodology	Туре	Draft Guidance – Housing Land Availability Assessment: Identifying appropriate land for
Wethodology		housing development + Suffolk
		Methodology
Sources in existing stock	1	
Sub-division of existing housing	S1	Sub-division of existing housing
Flats over shops	S2	Flats over shops
Empty homes	<b>S</b> 3	Empty homes
Intensification of existing areas	S4	Intensification of existing areas
Re-development of existing housing	S5	Re-development of existing housing
Brownfield land		
Previously developed vacant	S6	Previously developed vacant and derelict
&derelict land & buildings(non-housing)		land and buildings(non-housing)
Re-development of car parks	S7	Re-development of car parks
Conversion of commercial buildings	S8	Conversion of commercial buildings
Other sources		
N/A	<b>S</b> 9	Unimplemented /outstanding planning permissions
Review of housing allocations in plans	S10	Review of housing allocations in plans
Review of other existing outstanding allocations in plans	S11	Review of other existing outstanding allocations in plans
Vacant land not previously developed**	S12	Land not previously developed including Greenfield sites**
**For the purposes of the urban capa	 acitv studv ai	reenfield sites have been taken to include land

<sup>\*\*</sup>For the purposes of the urban capacity study greenfield sites have been taken to include land currently outside the physical limits boundary so are not included.

A more detailed explanation of each of these sources and how they were derived is included in **Appendix 1**, appended to this report

#### **Stage 3: Surveying Capacity Sources**

Having identified the different sources of potential capacity and the geographical areas of search the next stage of the study involved surveying each identified settlement for the various defined capacity sources.

Sites were identified initially by means of a desk-top exercise, followed by a street by street survey of each settlement to pick up any potential sites not identified at the desk top stage, and to check the status of those sites identified under the desk top study. The desk-top survey was based on an analysis of OS maps accompanied by the use of aerial photographs. Also included for the 2007 Study was a review of the 2004 Study to eliminate those sites that had already been brought back into use. It should be noted that many of the previously identified sites had in fact been brought back into use, or were well progressed through the planning process.

The site surveys themselves were carried out between November 2006 and the end of March 2007. A double check was made on those sites surveyed earlier in the period to ensure no change of circumstance had taken place e.g. planning application submitted which would alter their status as at 31/3/2007.

#### Stage 4: Assessing Yield (the Theoretical Potential)

This stage took forward all of those sites identified at the survey stage which were found to be physically capable of accommodating a dwelling(s), that were not currently in an alternative use; that were 0.2ha or more in size; or had an outstanding planning permission for residential use<sup>2</sup>.

Whilst no policy judgement was applied to sites at this stage, a pragmatic approach to development potential was still taken, resulting in a number of sites being dropped and not taken forward. These included those sites where development was likely to involve more than two different ownerships and those where access was considered to be so restrictive, as to make the site appear landlocked or unfeasible, and therefore where development was unlikely to take place. In these instances should it prove possible to overcome the difficulties identified, sites could still come forward as "windfalls".

Housing numbers were then calculated for each site by simply multiplying the total site area by a minimum housing density of 30 units per hectare. No policy or other constraints were applied at this stage.

#### **Stage 5: Discounting (Constrained Capacity)**

Having identified the "theoretical" capacity (i.e. the unconstrained capacity), the purpose of discounting is to estimate the "constrained" capacity of an area, i.e. the potential capacity that could realistically come forward and be developed during the Study period.

Discounting is considered to be the most problematic aspect of urban capacity assessment because it is "inherently judgemental" (TPP). There is therefore a need to be explicit, transparent and forward looking in the application of any discounting assumptions.

<sup>&</sup>lt;sup>2</sup> Refers only to those sites picked up through the on-site surveys where it was subsequently found that they had an outstanding planning permission but no work has started on site.

A number of constraints were looked at including physical and environmental e.g.whether a site is steeply sloping; of irregular shape; whether there are any Tree Preservation Orders or other environmental designations. Of particular relevance are those areas where existing adopted planning policy either precludes or substantially restricts development opportunities. In these instances development opportunities have been assessed to comply with adopted policy.

In addition, regard was had to the updated advice in relation to development and the risk of flooding. Where sites lie within Zone 3 Flood Risk i.e. the area most at risk the assumption has generally been made that the site, or that part of the site within the Flood Zone would not be developed. Where an alternative view is expressed this is clearly set out in relation to the entry for the individual site.

#### Stage 6: Developability and Market Viability

No market viability testing has been carried out for the 2007 Study. The main reason for this is that for the larger sites there is in the main known developer interest. In relation to smaller sites, evidence shows that these sites continue to come forward for development on a regular basis. Discussions with local developers supported this view. In addition, a conservative approach has been adopted in relation to these smaller sites,

#### Stage 7: The Final Results (Constrained Capacity – Urban Brownfield Land)

**Annex A** to this report includes the maps and site assessment sheets for all sites identified and considered for this 2007 Study and therefore all of the background information to support this Study.

The following Tables provide a summary of the final constrained capacity by settlement and by Source Type. Table 1 summarises provision by District and by the planning sub-areas within it. Table 2 provides a breakdown for each settlement by source type. It should be noted that In relation to Table 2 source type S9 is included for information. The figure quoted reflects the total numbers of outstanding planning permissions for these town and parishes as set out in the 2007 Housing Land Availability Document.

**Table 3** provides a further breakdown and shows only those source types which the Council consider make up the outstanding **urban brownfield potential**. To arrive at this figure, the following source types are excluded for the reasons given:

Source Type S9	excluded as the sites are already identified and being progressed.
Source Type S10	excluded because they are outstanding housing allocations -
	greenfield
Source Type S12	excluded because they comprise greenfield land albeit within the built
	up area boundaries.

Table 3 is important because it is this figure which is quoted in relation to the LDF and discussions on housing figures. **Appendix 2** to this document contains the maps showing the sites referred to in Table 3 for source types S4, S6, S7 & S8 – as defined in Appendix 1.

All sites subject to site survey were viewed from the public highway and visually assessed for obvious topographical or other physical features which could suggest any development potential. Findings were cross-checked with other publicly available information eg listed buildings register Assumptions made regarding deliverability have been made without reference to individual landowners except where stated.

Table 1 Constrained Capacity - District and Sub- Area Totals

က်	3)	83	S1 S2 S3 S4	S5	SS S6 S7 S8 S9	22	88	68	S10	S11	<b>S12</b>	S10 S11 S12 Total
282	<b>District</b> 12 12 319 282 0 193 25 45	282		0	193	25	45	Not included	307	196	212	307   196   212   <b>1603</b>
190 0 0	34 190	190		0		0 0	0	as urban capacity. Totals included	0	0	0	224
	285 92 0		0	0	193 25	25	45	separately as part of Housing Land Supply	307	196	307 196 212	1379

Table 2 - See following sheets

Table 3 Constrained Capacity – Urban Brownfield Potential

	S1	<b>S</b> 2	S3	84	<b>S</b> 2	98	2S	8 <b>S</b>	<b>S11</b>	S11 Total
District	12	12	_	282	0	193	25	45	196	1084
Ipswich Policy Area IPA	0	0	34	190	0	0	0	0	0	224
Rest of District	12	12	285	92	0	193	25	45	196	860

Table 2: CONSTRAINED CAPACITY BY SETTLEMENT

	S1	<b>S</b> 2	83	S4	<b>S</b> 2	98	22	88	S9	S10	<b>S11</b>	<b>S12</b>	Total
Alderton	0	0	0	0	0	0	0	0	2	0	0	0	2
Blythburgh	0	0	3	4	0	0	0	0	24	0	0	2	33
Bramfield	0	0	_	0	0	0	0	0	3	0	0	0	4
Dennington	0	0	2	0	0	0	0	0	5	0	0	4	14
Earl Soham	0	0	0	0	0	0	0	0	_	0	0	0	_
Eyke	0	0	4	0	0	0	0	0	0	0	0	0	4
Grundisburgh	0	0	2	က	0	0	0	0	33	0	0	0	38
Hollesley	0	0	2	9	0	0	0	33	12	0	0	0	26
Kirton	0	0	_	2	0	0	0	0	40	0	0	0	46
Knodishall	0	0	_	0	0	0	0	0	_	0	0	0	2
Melton	0	0	10	0	0	0	25	0	181	0	0	0	216
Orford	0	0	9	6	0	0	0	0	_	0	0	0	16
Otley	0	0	3	0	0	0	0	0	0	0	0	0	ဘ
Peasenhall	0	0	2	0	0	0	0	0	18	0	0	0	23
Rendlesham	0	0	4	0	0	0	0	0	187	162	0	0	353
Snape	0	0	2	0	0	0	0	0	11	0	0	0	16
Trimley St Mary	1	0	10	0	0	0	0	0	14	0	0	9	31
Trimley St Martin	1	0	3	0	0	0	0	0	22	0	0	0	26
Ufford	0	0	2	2	0	0	0	0	9	0	0	0	13
Westleton	0	0	9	0	0	0	0	0	10	0	0	0	16
Wickham Market	0	0	9	16	0	<sub>∞</sub>	0	12	2	0	0	0	44
Witnesham	0	0	2	0	0	0	0	0	3	0	0	0	2
Yoxford	0	0	9	0	0	0	0	0	11	0	0	0	17
Sub-total	2	0	93	45	0	8	25	45	287	162	0	12	979

	S1	<b>S</b> 2	83	<b>S4</b>	<b>S</b> 5	98	S7	88 88	68	S10	S11	S12	Total
Ipswich Policy	0	0	34	190	0	0	0	0	822 **/isoludo	0	0	0	1,046
Area (including Martlesham)									s 5 units				
									from other IPA				
									parishes)				
Aldeburgh	_	2	36	16	0	0	0	0	95	0	0	0	150
Felixstowe	5	2	78	0	0	20	0	0	161	0	158	2	426
Framlingham	_	2	19	0	0	29	0	0	114	0	0	∞	211
Leiston	_	2	21	31	0	20	0	0	81	0	0	178	334
Saxmundham	_	2	ဝ	0	0	46	0	0	112	145	38	0	353
Woodbridge	1	2	29	0	0	32	0	0	184	0	0	12	260
			_							_			
TOTAL	12	12	319	282	0	193	25	45	2156	307	196	212	3759

# APPENDIX 1 SOURCES OF CAPACITY

Assessme	rpe Guidance – Housing Land Availability nt: Identifying appropriate land for evelopment + Suffolk Methodology	Information Source
S1	Sub-division of existing housing	Historic rates of planning permission
S2	Flats over shops	Historic rates of planning permission
S3	Empty homes	Council tax data relating to unfurnished properties vacant for 12 months plus
S4	Intensification of existing areas	Site surveys and monitoring of planning permissions
S5	Re-development of existing housing	Essentially large scale redevelopment none of which is present in the district
S6	Previously developed vacant and derelict land and buildings(non-housing)	Site surveys
<b>S</b> 7	Re-development of car parks	Site surveys and information on usage of Council car parks
S8	Conversion of commercial buildings	Site surveys
S9	Unimplemented /outstanding planning permissions	Includes not started and under construction. Annual monitoring and site surveys
S10	Review of housing allocations in plans	Desk top review
S11	Review of other existing outstanding allocations in plans	Desk top review
S12	Land not previously developed including Greenfield sites**	Site surveys

#### **APPENDIX 2**

#### **SITE MAPS TO ACCOMPANY TABLE 3**

**Settlements containing brownfield capacity for source types:** 

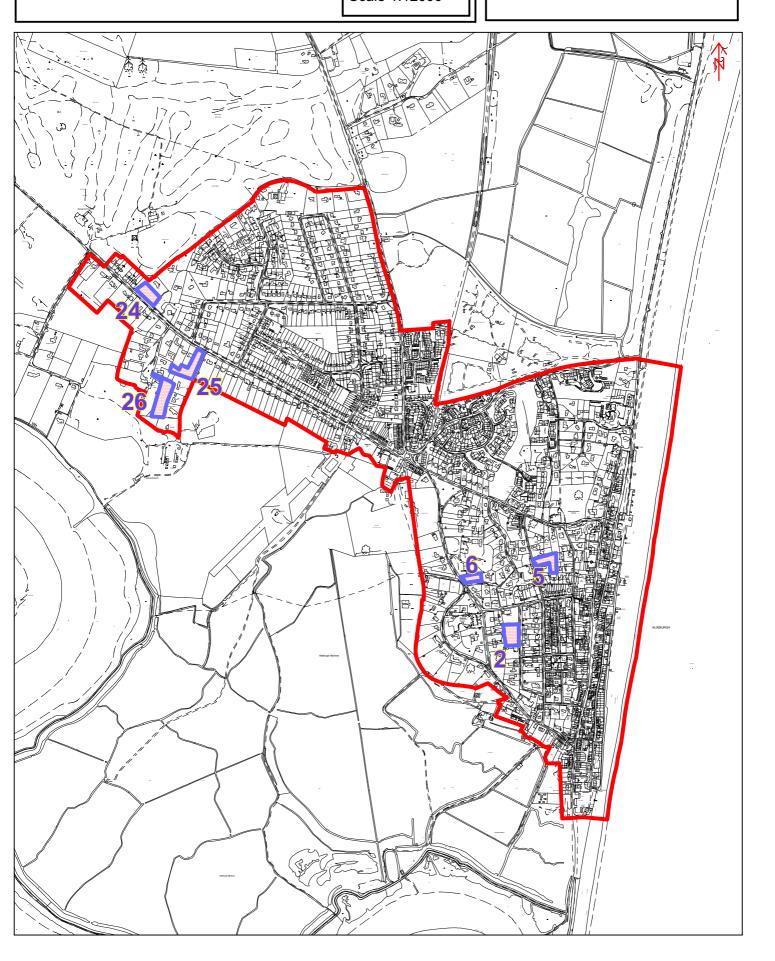
- S4
- S6
- S7
- S8

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Scale 1:12000

#### **ALDEBURGH**

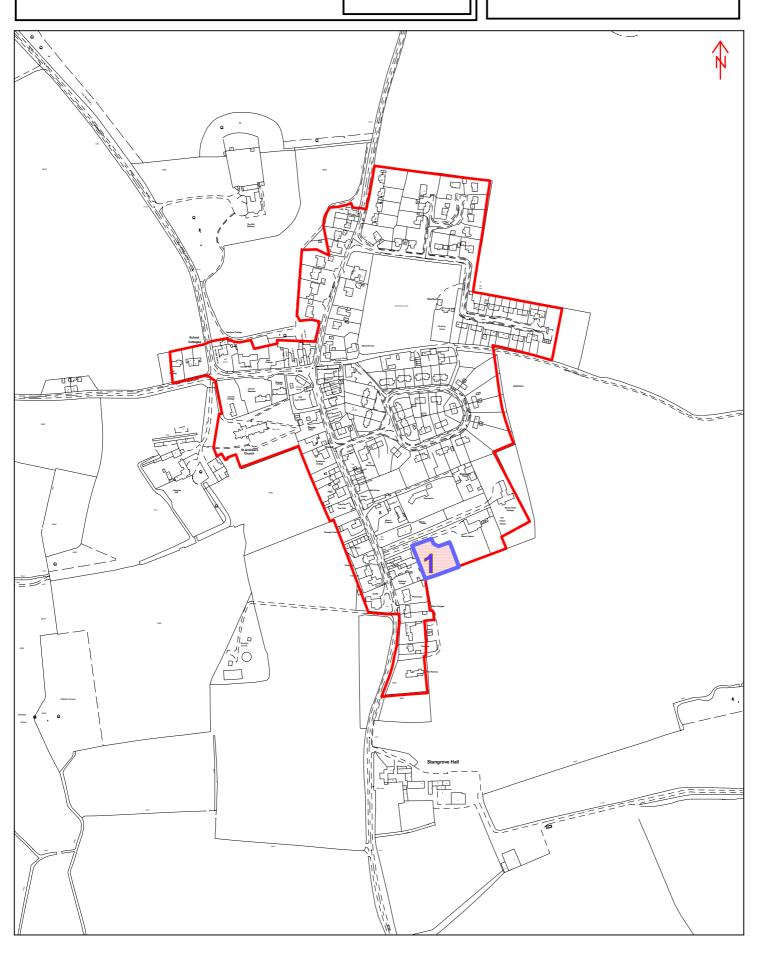


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Scale 1:5000

#### **ALDERTON**

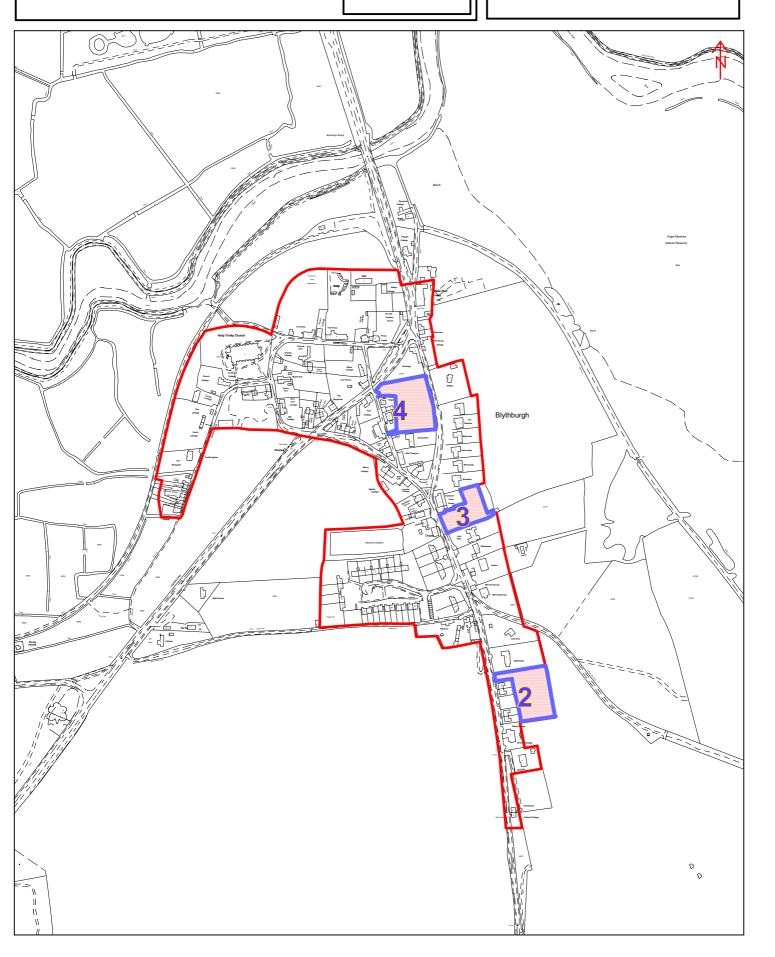


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Scale 1:5000

#### **BLYTHBURGH**

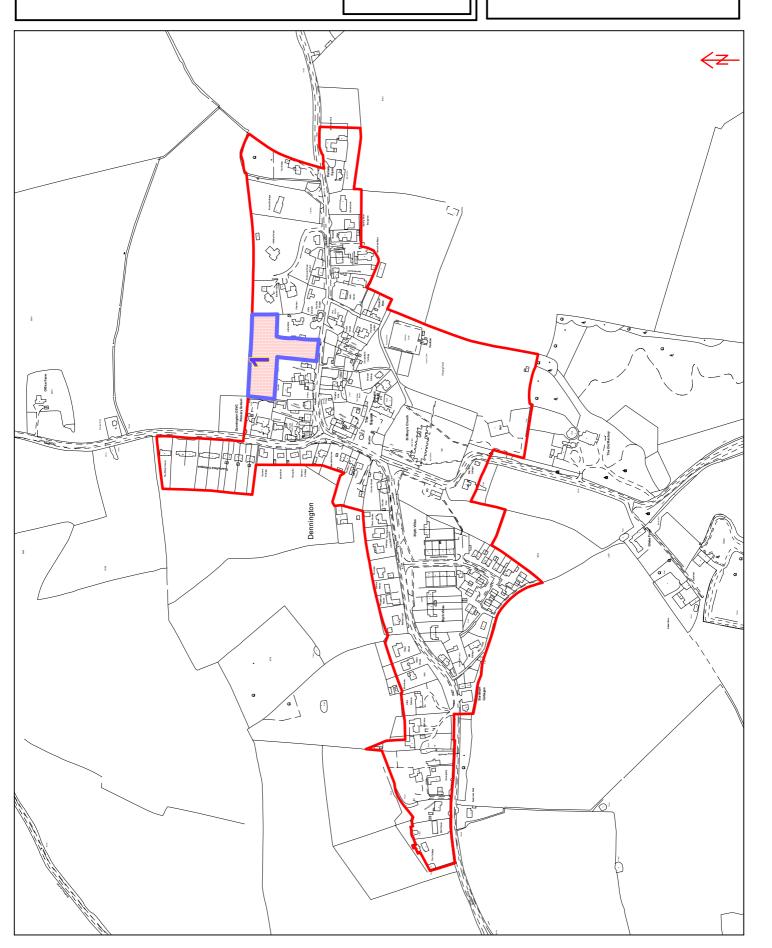


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Scale 1:5000

#### **DENNINGTON**

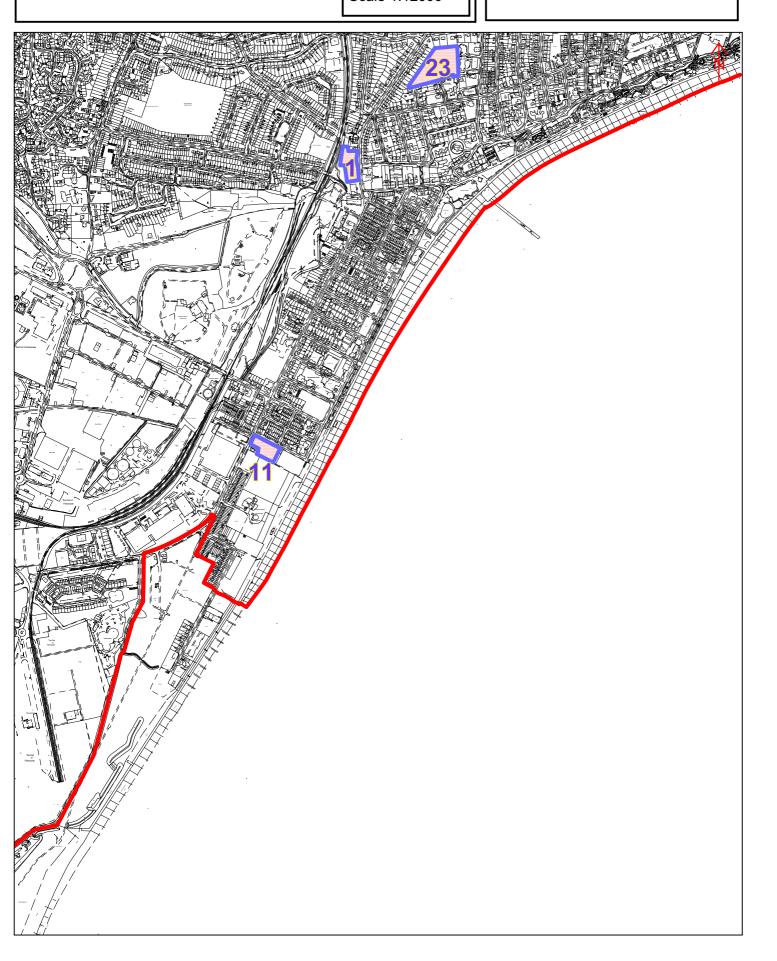


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Scale 1:12000

#### **FELIXSTOWE** (South)

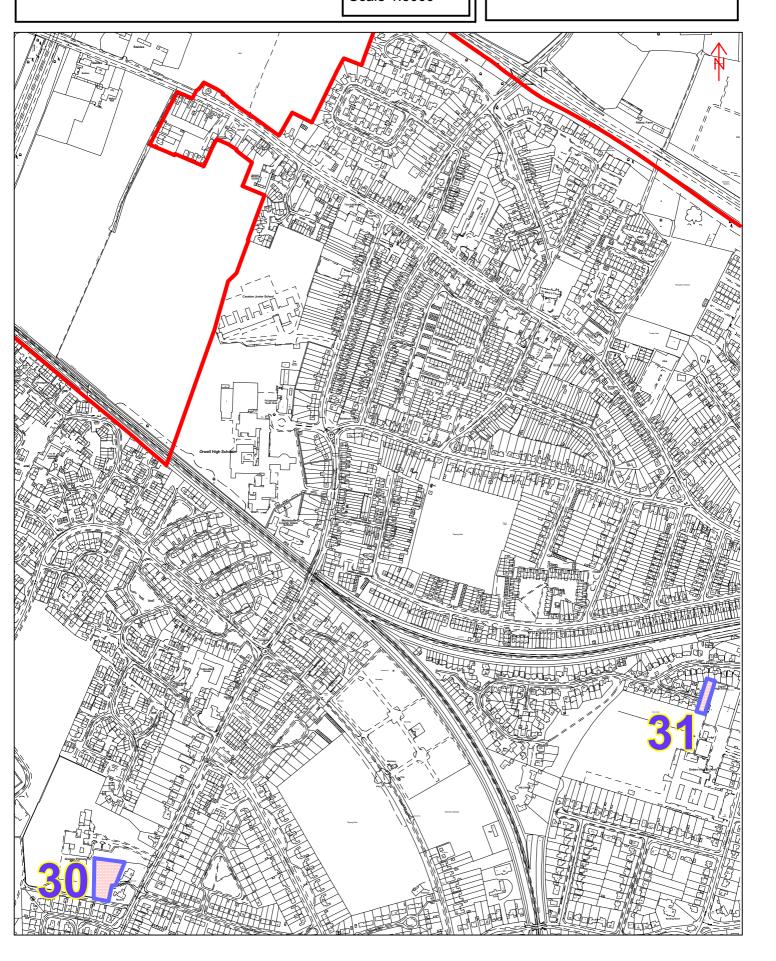


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Scale 1:6000

#### **FELIXSTOWE (West)**

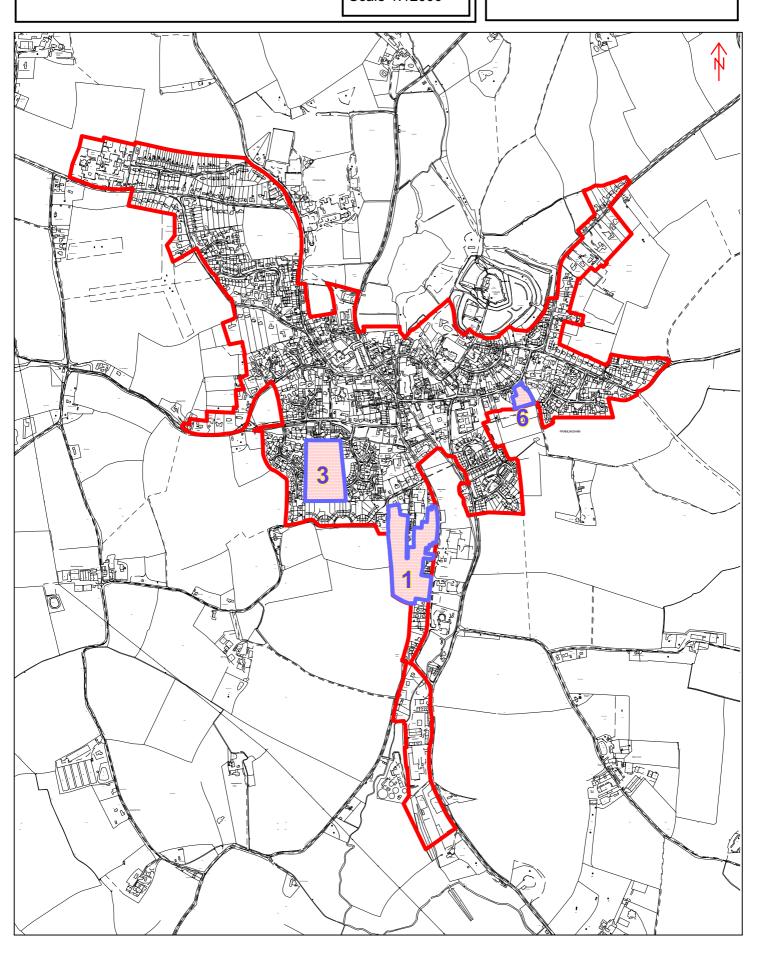


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Scale 1:12000

#### **FRAMLINGHAM**

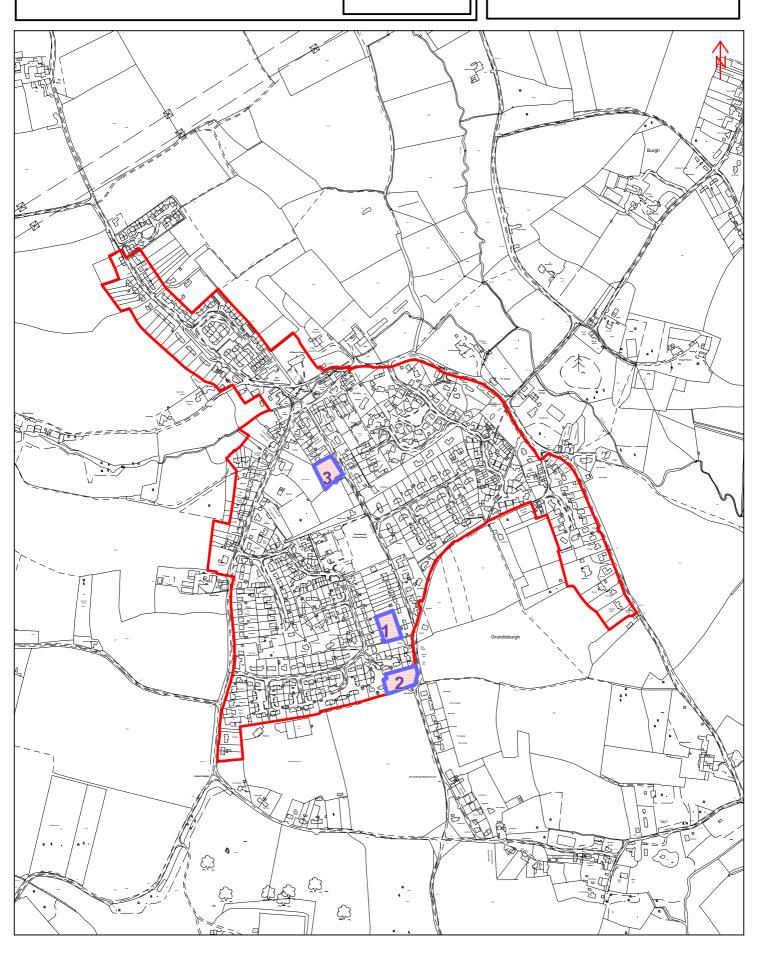


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Scale 1:7500

#### **GRUNDISBURGH**

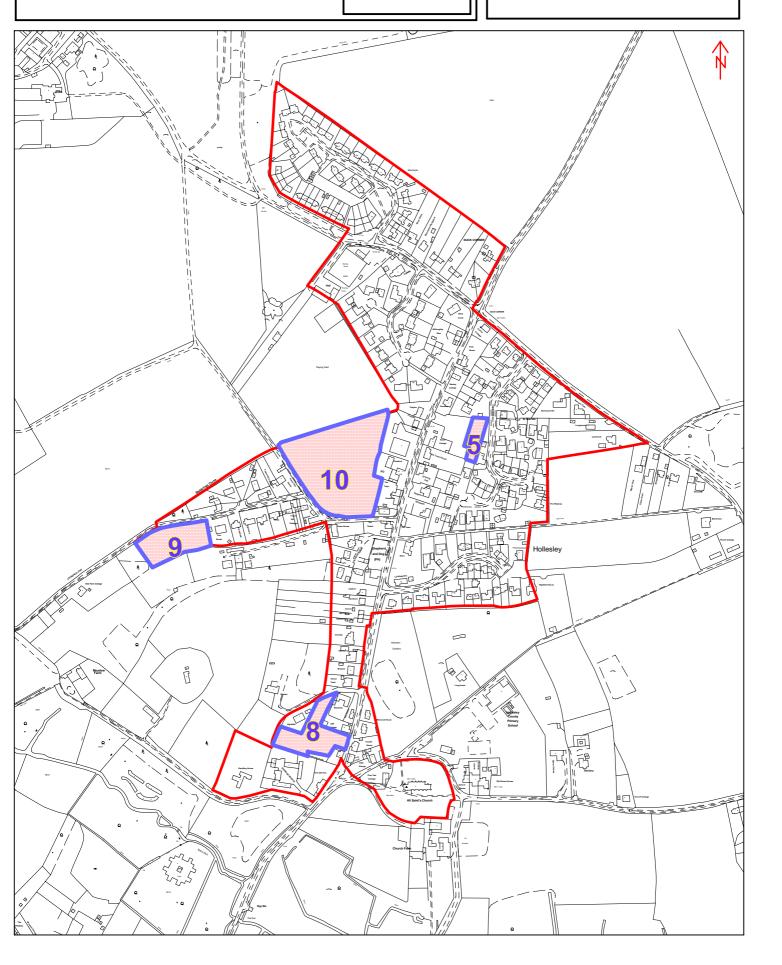


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Scale 1:5000

#### **HOLLESLEY**

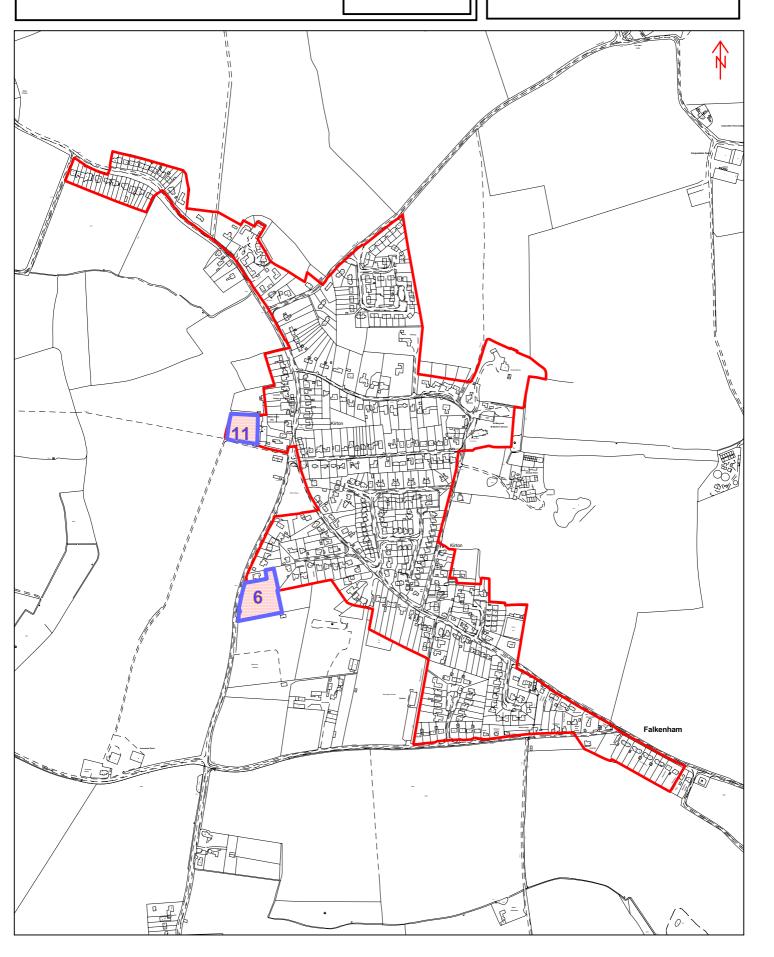


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Scale 1:7500

#### **KIRTON**

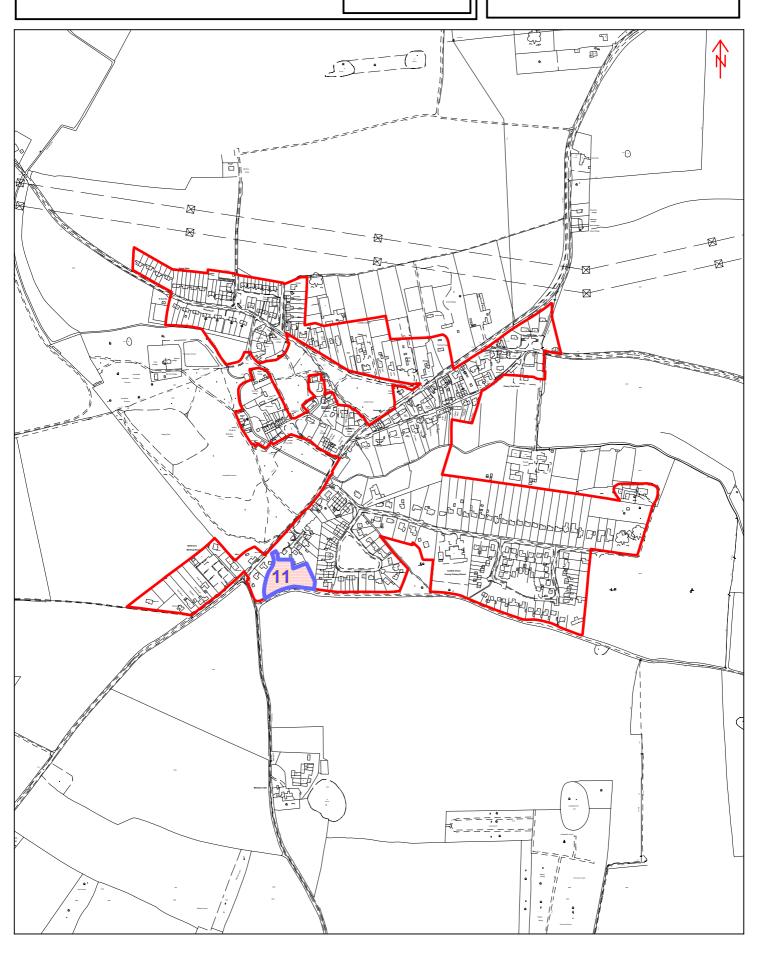


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Scale 1:7500

#### KNODISHALL

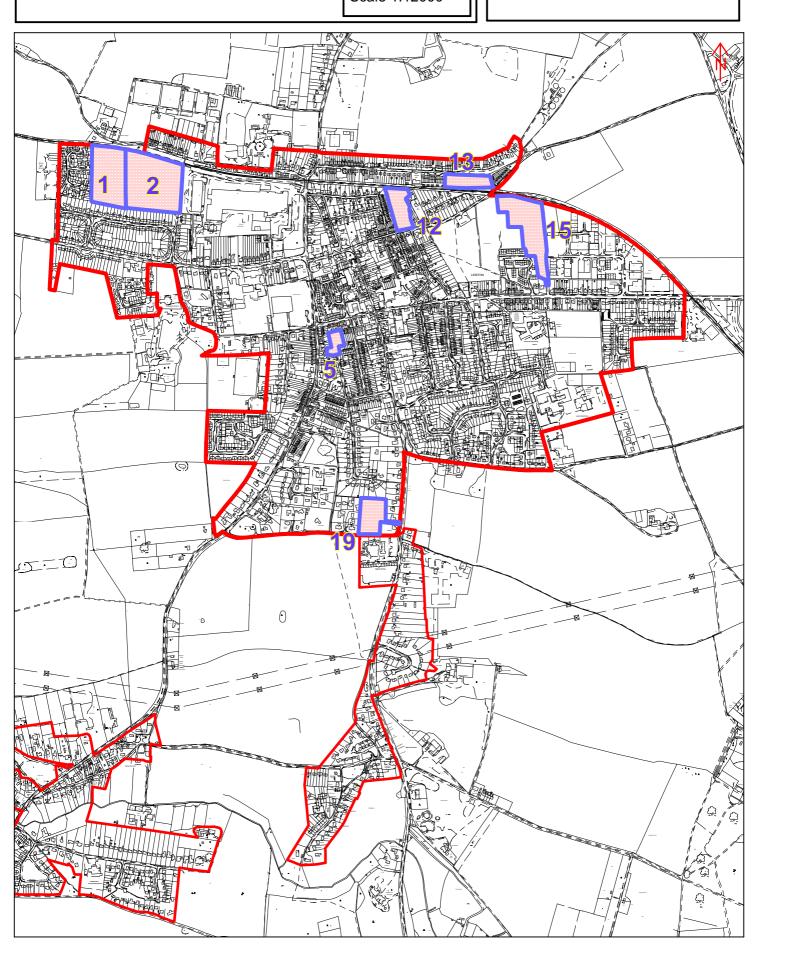


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#### **LEISTON**

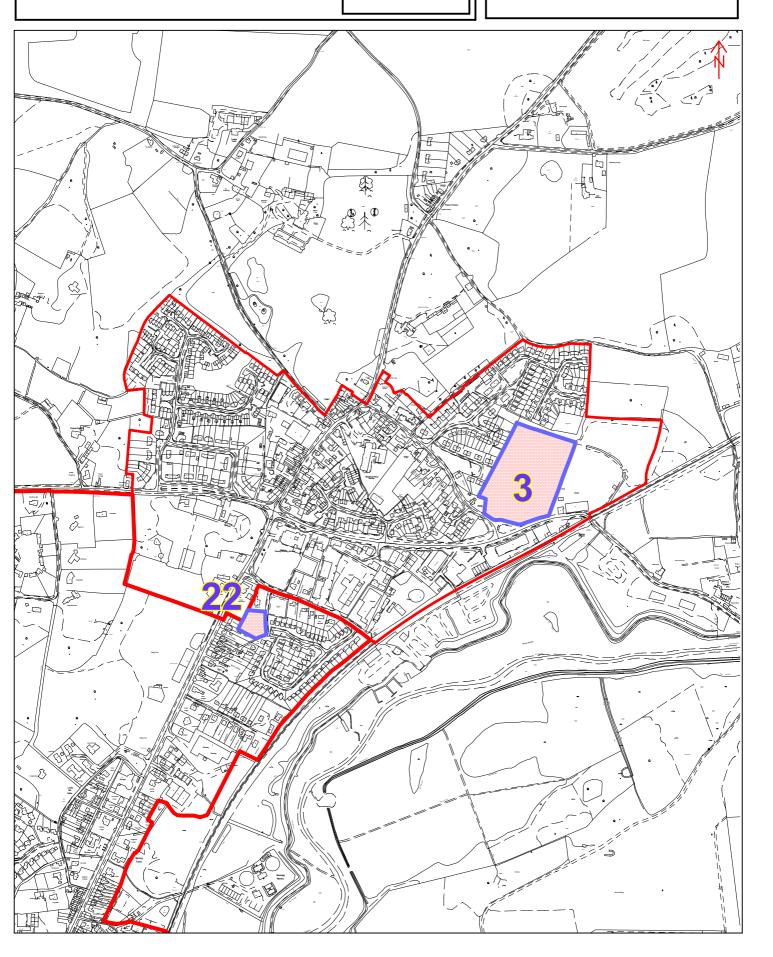


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#### **MELTON**

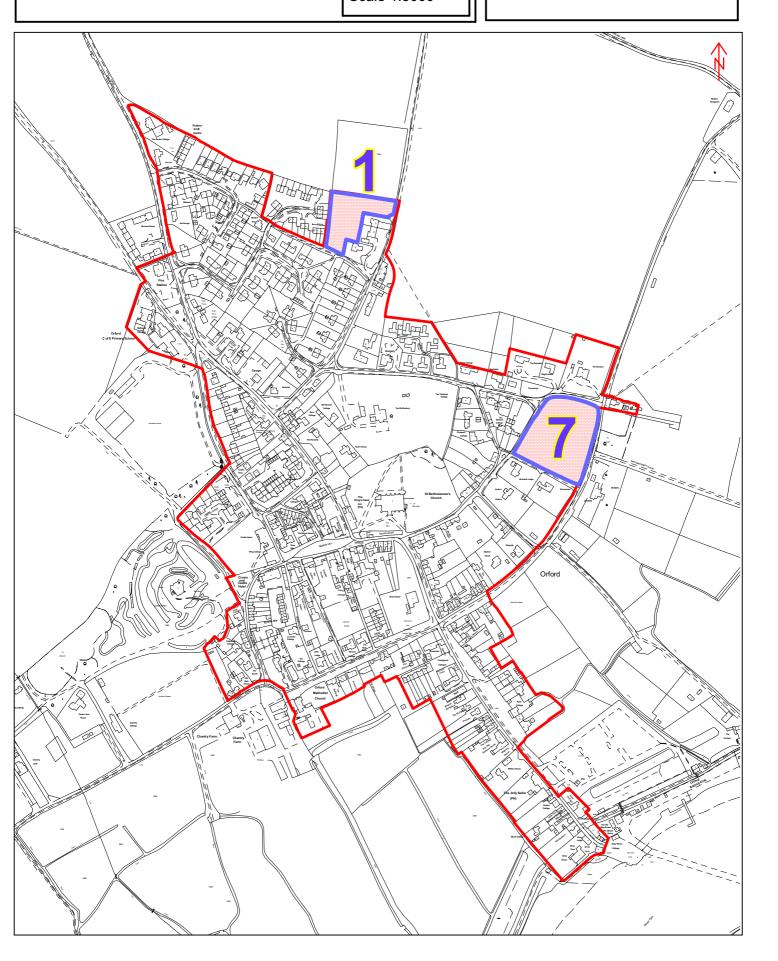


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#### **ORFORD**

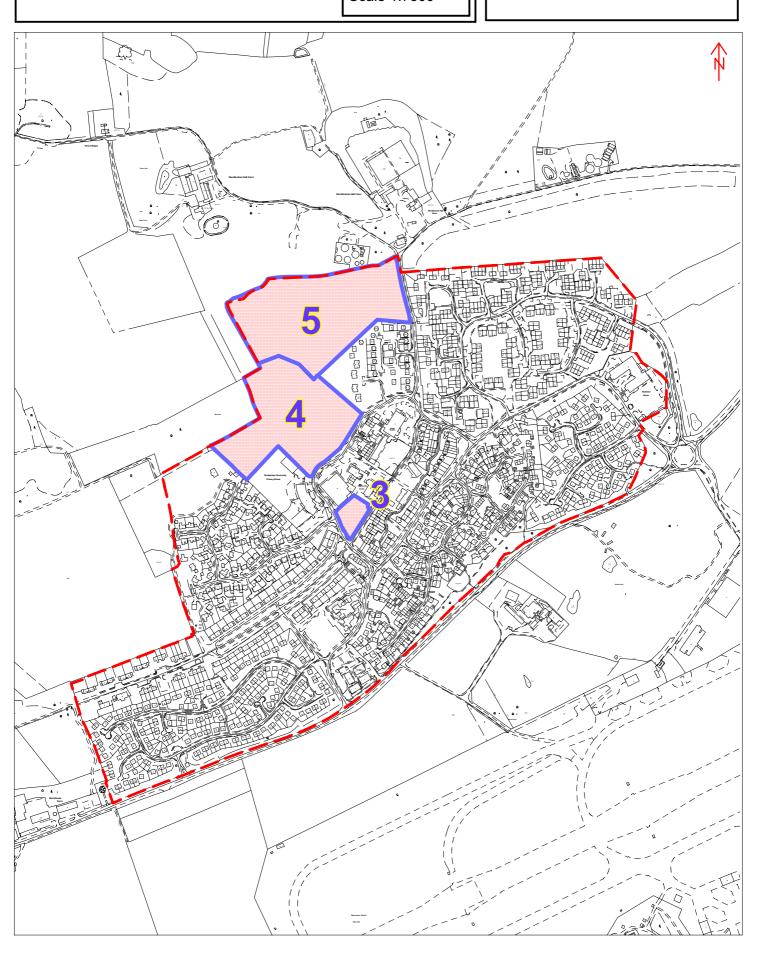


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#### **RENDLESHAM**

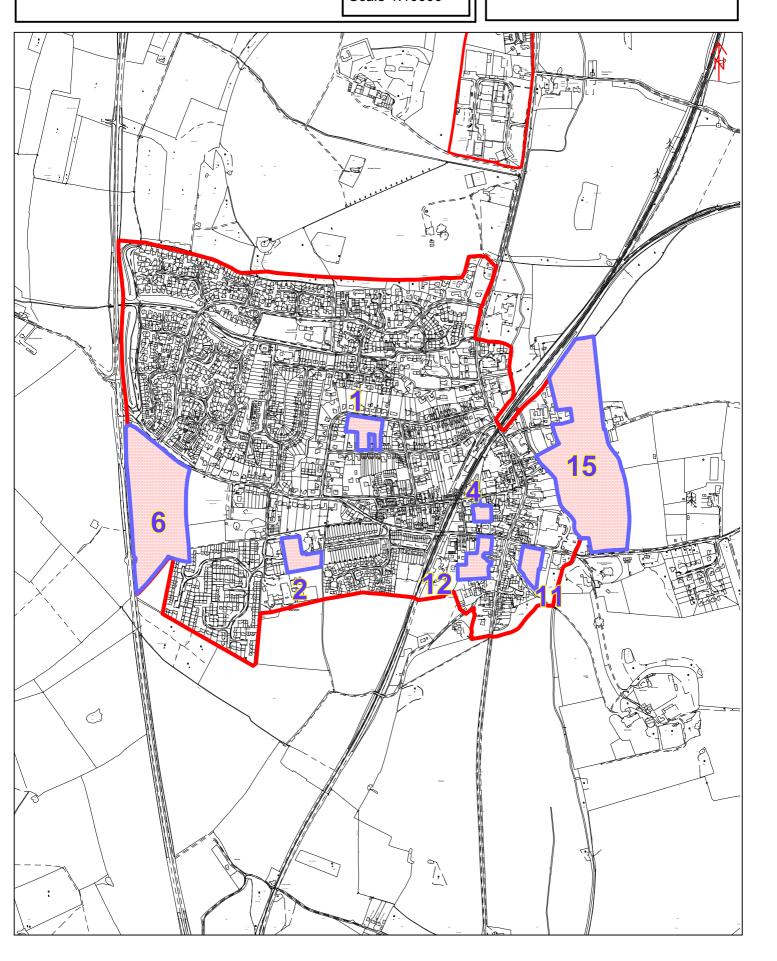


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#### **SAXMUNDHAM**

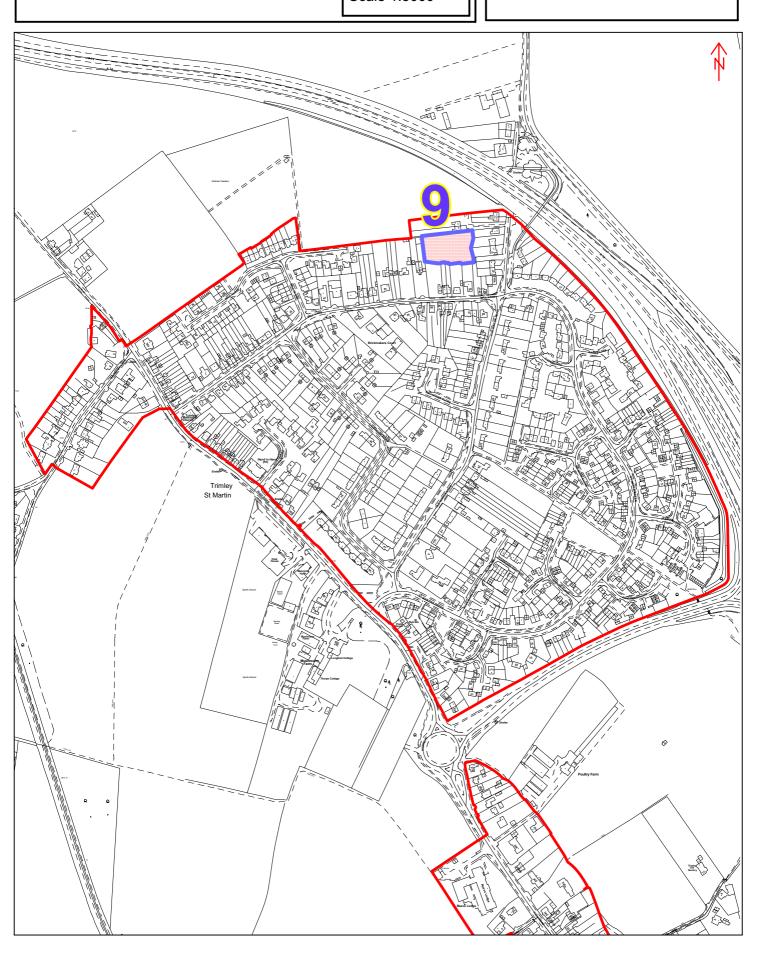


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#### TRIMLEY ST. MARTIN

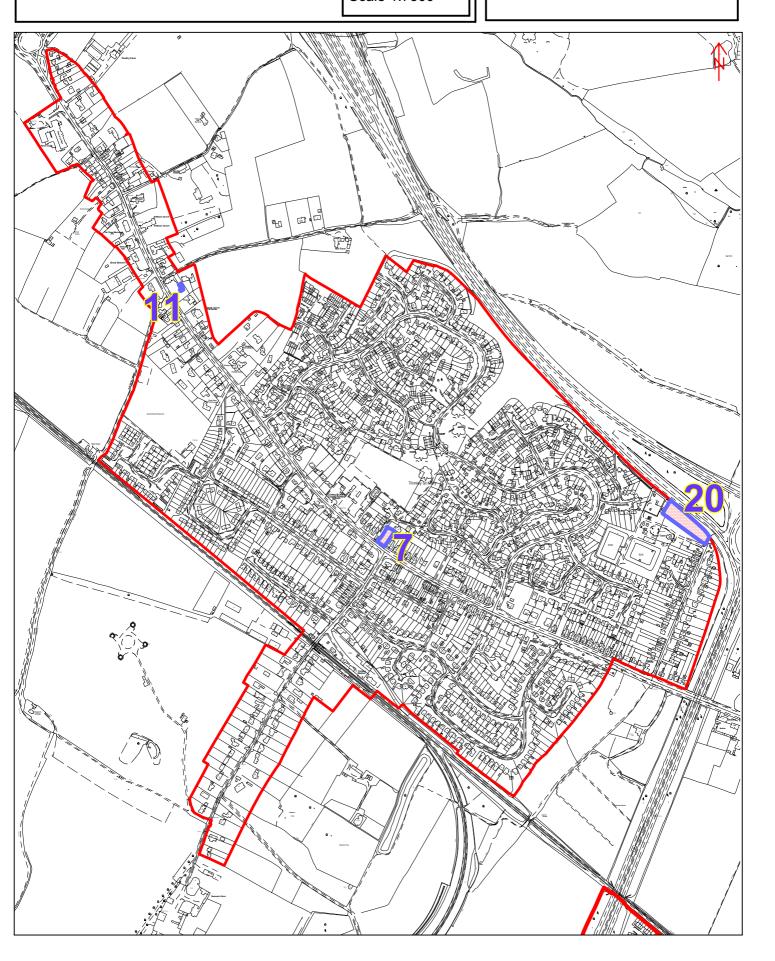


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#### TRIMLEY ST. MARY

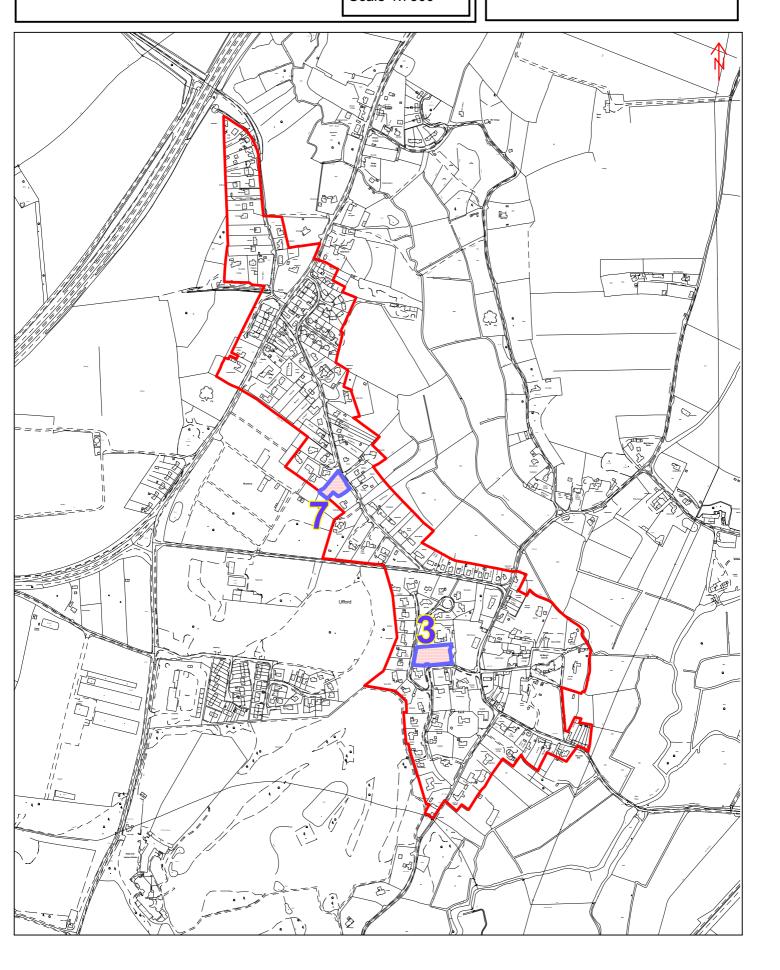


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#### **UFFORD**

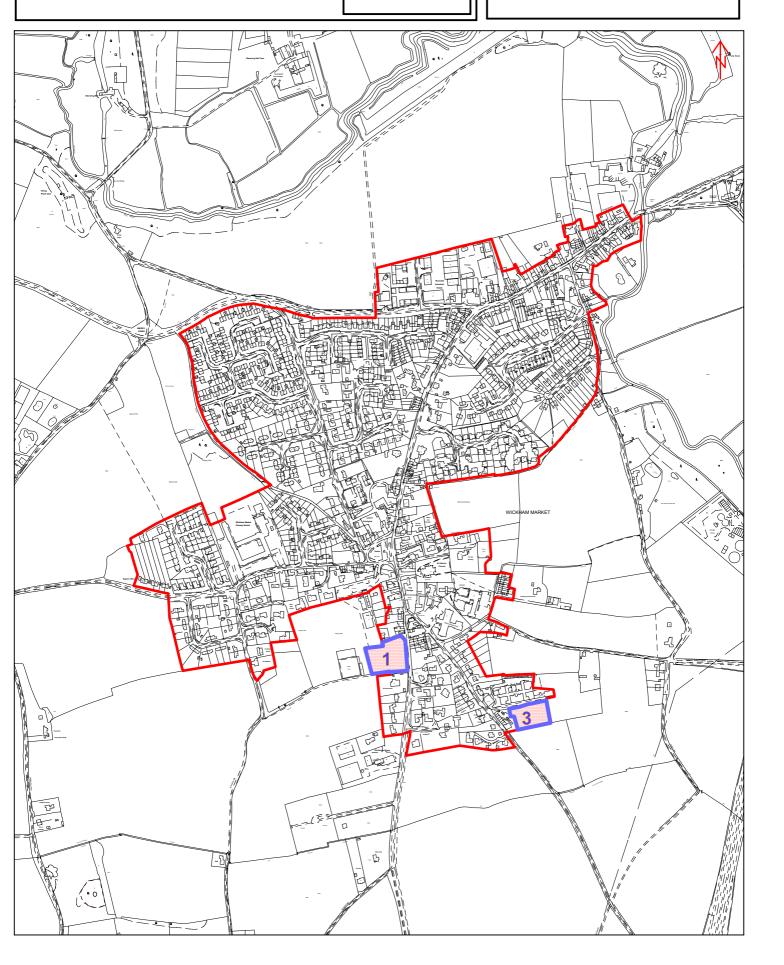


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#### **WICKHAM MARKET**

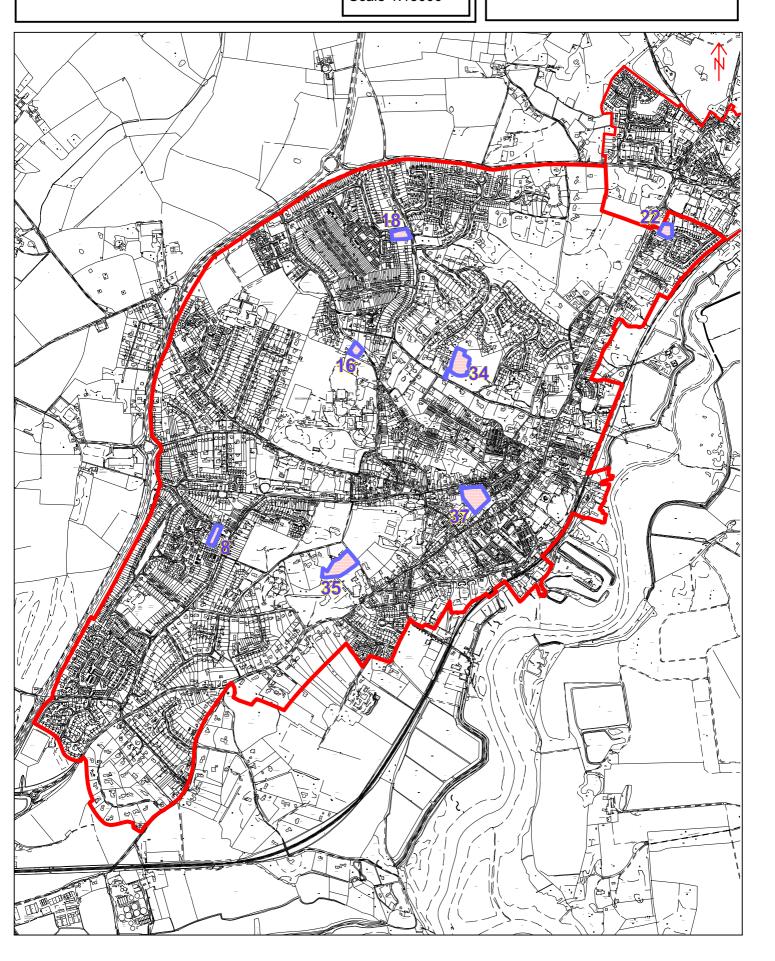


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