

Westerfield Neighbourhood Plan Referendum

Summary of Representations

This document contains summaries of the representations made in response to the consultation on the Submission Westerfield Neighbourhood Plan which was held between 21st August 2024 and 9th October 2024. The representations were submitted to the Examiner for consideration during the Examination of the Westerfield Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/westerfield-neighbourhood-area/

Respondent	Summary of Representation
Ambury Development (Savills)	Ambury Development owns a parcel of agricultural Land to the north of Lower Road.
	Policy WFD4 – Protection of Important Views States that development within areas deemed as important view designations are supported by a Landscape and Visual Impact Assessment. This representation provides further discussion of views 5, 9a and 9b.
	View 5: Footpath west of Fullers Lane, towards the southwest It is argued that this view is residential rather than wooded, being dotted with residential properties. This means that it is a view into the village, rather than an "important view."
	Views 9a and 9b: footpath 2, facing south This view has been split into two parts: 9a and 9b, both of which face south.
	States that views across the valley are interrupted by a water abstraction, booster and treatment plant. There are also large-scale pylons across the site. Consequently, this cannot be considered a key view.

Furthermore, this key view could prevent further development of the water abstraction, booster and treatment plant.

Basic conditions

Believes the neighbourhood plan fails to meet the following basic conditions. Stating:

The Suffolk Coastal Local Plan does not contain any protective designation within Westerfield. Furthermore, both the NPPF and Suffolk Coastal Local Plan seek to encourage sustainable development within villages that will enable villages to grow and thrive. Both the NPPF and Suffolk Coastal Local Plan balance the need to protect valuable landscapes, while not choking off innovative development or change.

A restrictive designation prevents possible future development including the expansion of vital infrastructure and is contrary to local and national policies by preventing sustainable development. Therefore, the neighbourhood plan fails to meet the basic conditions.

Anglian Water

Overall, Anglian Water is supporting of neighbourhood plan, subject to the following changes being made.

Policy WFD3 – Local Green Spaces

Anglian Water has water and water recycling assets located within or in the vicinity of the local greenspaces. It is not considered likely that this will impact on work to AW assets. However, they requested clarification the policy relates to NPPF, para 107 (2023).

Policy WFD1 - Landscape Buffer

There are main pipes along the north and eastern boundary of this designation. However, they state the policy should not prevent maintenance and repair.

Policy WFD5 – Protection of Trees, Hedgerows and other Natural Features

Anglian Water supports this policy. There may be benefit in referencing the emerging Local Nature Recovery Strategies for priority actions and maps of specific areas for nature recovery.

Policy WFD6 – Design Considerations

Paragraph 7.12

Anglian Water welcomes reference to Local Plan policies SCLP9.2 and SCLP9.7. Anglian Water also encourages the inclusion of policies that promote greater water efficiency.

	Criterion (e) SuDS
	Anglian Water supports the inclusion of SuDs schemes in new
	development. Nature-based SuDS are supported and should be
	included in new development where possible.
	Westerfield Design Guidance and Codes
	Code 7
	Replace the word 'porous' with 'permeable.'
	Code 21
	Could be expanded to include information about water saving.
	Section 4.4 could also be amended for the same reason.
	Figure 56, point 6
	Should read 'highly water-efficient resources' rather than
	'highly waste-efficient resources.'
	Checklist 10
	The neighbourhood plan could specify the use of permeable
	surfaces to reduce surface water runoff.
Anthony Cornell	States there is a lack of pedestrian crossing facilities at
	Westerfield Station, and this means that rail users cannot cross
	from one side of the station to the other when the barriers are
	down. As a result, some commuters no longer use Westerfield
	Station to travel to London. The Neighbourhood Plan
	acknowledges this issue but they suggest this does not provide a satisfactory solution. This issue is likely to become more
	serious due to nearby residential development and the
	increasing use of the line for freight movements.
	mercusing use of the line for reight movements.
	The situation is further exacerbated by trucks reversing out of
	the Network Rail yard onto the B1077.
	East Suffolk Council and Network Rail should discuss relocating
	the station to the green between Fonnereau footbridge and
	Westerfield level crossing. This provides station users with a
	footbridge and removes the hazards faced by users of the
	current station. It will also attract residents of the new suburb
E + C ((!! C :!	to using the train.
East Suffolk Council	East Suffolk Council supports the Westerfield Neighbourhood
	Plan and it is considered that overall it complements the Suffolk
	Coastal Local Plan. There are some outstanding matters and
	amendments. Comments about the submission document are set out below.
	The comments below require further consideration during the
	examination.
	Map 5 – Landscape buffer and sensitive landscape

The policy area does not match any physical features and so it would be hard to determine whether an application is located inside or outside of the policy area.

Renumber maps 4 and 5 as maps 3 and 4.

Maps 6 (Local Green Spaces) and 9 (Design Considerations)

The railway station is not identified as a village facility on map 9.

Map 9 – Village Facilities

Village facility 6 – northern edge excludes northern edge of the site.

Village facility 2 – the boundary is not the same as that in local green space 3-1, on map 6.

Village facility 3 – the northern edge of the site differs to that of local green space WFD 3-2, as shown on map 6.

Map 6 (Local Green Spaces) – WFD 3-1 and WFD 3-2 are shown with a common boundary. However the inset map on page 50 of the Local Green Space appraisal shows a gap between the two.

Map 8 – Westerfield's Ecological Networks

Policy WFD5 appears to extend beyond the neighbourhood plan area. The map should not impose neighbourhood plan policies on other areas.

The comments below are minor, but the examiner may still wish to recommend changes as a result.

Paragraph 4.2, point 1

It is not clear whether 'small village' relates to the Suffolk Coastal Local Plan area. There is no explanation of 'green ring.' This potentially exceeds Local Plan restrictions on development.

Chapter 5 – Village Development Locations

Page 15 – Policy box excludes SCLP5.2.

Paragraph 5.1

Text is unclear about the interpretation of policy.

Paragraph 5.5

Amend text to state that neighbourhood plan cannot allocate less housing than the Local Plan or revoke a Local Plan allocation.

Chapter 6 - Landscape and Natural Environment

Policy WFD1 – Landscape Buffer

Questions whether the policy is trying to prevent settlement coalescence or protect the historic environment?

WFD2 – Sensitive Landscape

The Landscape and Visual Impact Assessment and Heritage Impact Assessment could be used to refuse proposals that are in accordance with SCLP3.3. Requirement for a Landscape and Visual Impact Assessment should be limited to larger developments. The policy replicated WFD1.

The sensitive landscape area has not been defined, nor is it clear why it should receive protection.

WFD3 – Local Green Spaces

It is questioned whether sites 3 and 4 have been justified as local green spaces.

Map 7 - Important Views

There is no explanation about an additional view (9A).

Views in Map 7 differ from the design guidance.

There are differences between the important views in map 7 and the Landscape Appraisal.

Paragraph 6.18

The text does not reference the Planning Practice Guidance paragraph number.

Paragraph 6.19

Text does not cite source of quote.

WFD4 – Protection of Important Views

Policy should be amended to refer to 'significant' rather than 'important' view. It should state that development will not have a significantly detrimental impact, rather than just a detrimental impact.

Paragraph 6.22

Delete or update paragraph to refer to biodiversity net gain.

WFD5 – Protection of Trees, Hedgerows and Other Important Views

Explanation about the phrase 'Otherwise acceptable...' is needed.

b) Expand supporting text to consider whether native species should be resistant to climate change.

Change reference from map 7 to map 8.

Explain 'distinctive tree' in the supporting text.

Chapter 7 – Built Environment WFD6 – Design Considerations

Amend text to refer to the Neighbourhood Plan Design Code.

e) The neighbourhood plan takes a blanket approach to preventing development in the flood zones, but this may be acceptable in some cases.

Paragraph 7.17

Amend NPPF reference to 191c).

WFD7 – Artificial Lighting

Suggested changes to wording of points ii) and iii)

Chapter 8 – Services and Facilities Paragraph 8.2

Refer to Suffolk Coastal Local Plan SCLP8.2.

Policy WFD8 – Parish Services and Facilities

Consider whether there should be another section about transport.

Chapter 9 – Highways and Travel Map 10 – Parish Public Rights of Way Network

Modify map 10 to state that public rights of way are correct as of a certain date.

Design Guidelines and Codes

Paragraph 1.1

Update the NPPF number.

Page 15, Figure 08

	Important views differ from those in the neighbourhood plan and Landscape Appraisal.
	Code 8
	Refer to Suffolk County Council Parking Standards (2023).
	Landscape and Biodiversity Evaluation, 2023
	Paragraph 2.2
	Update NPPF references.
	Landscape Appraisal
	Page 45, figure 8.1
	Add important views to the key.
	Explain why there is only one important viewpoint.
Environment Agency	Westerfield contains areas of fluvial flood risk. Provided development is directed away from sensitive areas highlighted there should be no significant environmental impacts. Recommends development is steered away from areas of flood risk and that the neighbourhood plan contains policies to manage flood risk.
	Further recommended that new developments make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction.
	Source Protection zones should be considered if development is planned within them.
	Finally encourages neighbourhood plans protect the environment and identify biodiversity net gain sites.
Historic England	Refers back to comments as per reg 14.
Ipswich Borough Council	Overall, there is a need for the neighbourhood plan to balance protecting the character of Westerfield against the need to meet increased housing demand.
	WED2 - Local Groop Spaces
	WFD3 – Local Green Spaces Limit local green space allocation WFD3.4 to woodland habitat,
	as the rest of the site contains no designations. Local green
	space allocation WFD3.3 is excessive and does not meet the
	definition of LGS and should be removed.

WFD5 – Protection of Trees, Hedgerows and other Natural Features

Incorporate Landscape Appraisal recommendation that new development replicates the well vegetated edge of the village into the relevant policy.

In paragraph 1, reference should be made to map 8, not map 7.

Chapter 5 – Village development Locations

The published results of the residents' survey show only those that strongly agree and so does not take show all views.

Chapter 6 – Landscape and Natural Environment

Map 5 should be illustrated with a key, rather than labels for clarity.

Chapter 8 – Community Services and Facilities

The policy is supportive of new community facilities but does not say what is needed. This would be useful to enable the Council to plan and allocate CIL and section 106 funding.

Other areas of note

The Landscape Appraisal recommends area WF3 is designated as an 'Area of Greater Landscape Value' and that new housing proposal avoid development of the meadows. This could impact upon the business park. A successful village requires a mix of housing, employment areas and green space. Loss of the business park may impact air quality and congestion as more residents travel further to work.

Supports proposal to develop yard area of railway station into a car park. The neighbourhood plan should include cycle parking specifications for this location. Would also support proposals for cycle infrastructure and to promote sustainable transport.

Rewilding is mentioned but not addressed in policy. There are no mentions of restoring ecosystems where nature is allowed to take care of itself – the aim of rewilding. Supports further policy measures to enhance wildlife.

States that the submitted Neighbourhood Plan requires further amendments to meet the basic conditions. It should therefore not progress to examination. The neighbourhood plan will need to reconsider its objectives around the 'green ring' and landscape buffer to ensure that it is not restricting development in suitable locations.

Land west of Westerfield Road, Westerfield

The site is well related to the settlement, although only the south of the site lies within the settlement boundary.

Westerfield station is accessible by sustainable modes of transport and is closely located to services in Westerfield. Development of the site could deliver a high quality, landscapeled scheme and could provide improvements to the public rights of way network and the landscaped edge of the countryside.

2. Comments on Westerfield Neighbourhood Plan

Concern that the 'green ring' around the settlement boundary will have a detrimental impact on future growth and is not in accordance with the Local Plan.

It will mean that the settlement boundary cannot change to accommodate future growth.

Neighbourhood plans should not prohibit growth, but that appears to be the intention of this objective.

The objective of a 'green ring' should be amended and reference to the Settlement Boundary should be removed.

Policy WFD1 – Landscape Buffer

States the landscape buffer was identified without discussion with the landowner (Ipswich School).

Policy objectives are unclear and there is no definition of landscape buffer and whether vegetation will be planted. Who will fund planting and maintenance? Is the area of the buffer specific of that identified on map 5?

Reducing the risk of settlement coalescence can be achieved without a designation that restricts development coming forward. Suggests removing first paragraph of the policy as well as the green area on map 5. Incorporate landscape buffer into any future development to ensure it follows urban design, landscape and heritage principles.

The designation of a buffer from a heritage perspective is not understood. Listings of Swan's Nest, Westerfield Hall and Barn and Outbuildings to south-east specifically mention open fields. Settings are already well-contained through walled boundaries.

Believes part two seeks to prevent development that might be permitted under Local Plan policy SCLP3.3

WFD4 – Protection of Important Views

There are two different documents that support the selection of important views: the design codes which reflect views of local people and the Landscape Appraisal. Two evidence documents is a cause for confusion.

Excessive number of viewpoints reduces their value and is overly restrictive, thus conflicting the Local Plan.

WFD4 does not provide guidance about appropriate development in locations that affect important views.

Viewpoints 6 and 7 provide short views over the same field and this is questioned. There are inconsistencies in the types of views identified. Evidence should be reviewed why different types of views have been identified and their implications.

WFD5 – Protection of Trees, Hedgerows and other natural features

WFD5 is generally supported. However, it is questioned how it works alongside national policy, particularly regarding biodiversity net gain.

National legislation requires 10% biodiversity net gain. There is no need to duplicate detailed guidance of NPPF and NPPG. A higher biodiversity net gain requirement should be strongly justified by robust evidence.

The third paragraph undermines the biodiversity metric and does not appreciate existing requirements. It therefore does not meet the basic conditions.

Biodiversity enhancement should be steered by national legislation to avoid confusion.

WFD6 – Design Considerations

Concern that the policy repeats the Local Plan and does not provide details of characteristics that are important to

	Westerfield. Design Guidelines and Codes are referenced but are not subject to same rigour and consultation as a Local Plan or Neighbourhood Plan. The policy diverts decision making to documents that are outside of the Neighbourhood Plan process.
	WFD9 – Public Rights of Way Land west of Westerfield Road provides an excellent opportunity to improve the footpath network. Measures to improve biodiversity provision along existing routes can also be included in future development proposals.
	Conclusions Ipswich School supports creation of the Neighbourhood Plan.
	There is concern that the Neighbourhood Plan is restricting future development opportunities and not allocating development sites. Restrictive policies could impact site selection during Local Plan preparation process by designating a landscape buffer.
	An allocation policy may be the most appropriate way to protect the setting of listed buildings. This would allow the landscape buffer to be designed into any development and still limit settlement coalescence and provide a landscape buffer on listed buildings north of the site.
	The Neighbourhood Plan does not allocate sites but also should not hinder sites coming forward as part of the Local Plan review.
National Grid (Avison Young)	National Grid has no specific comments to make about the Westerfield Neighbourhood Plan.
	A assessment of the site determined that there are no assets affected by proposed allocations within the Neighbourhood Plan area.
National Highways	National Highways considers that the Neighbourhood Plan's
Natural England	proposals may not impact upon the Strategic Road Network. Natural England has no specific comments to make about the Westerfield Neighbourhood Plan.
Network Rail	Response to Community Action 9 – Westerfield Railway Station
	Secure more stopping services at Westerfield

Network Rail is examining how to increase frequency of services on the East Suffolk Line and will produce proposals about how this could be achieved.

2. Consider the parking impact of additional commuter traffic. Invest in a bike strategy and turn the works area into a car park.

NR opposes relinquishing use of the service yard to create a car park. The yard is a valuable access point to the railway.

NR is willing to discuss creating a footpath through the yard and to connect with the new cycle bridge.

Greater Anglia will need to determine the amount of cycle storage provision and similar station facilities. GA, NR and East Suffolk Council must determine most effective way to allocate future and existing S106 funds in terms of the railway station.

3. Ensure the S106 funding available for the station from the northern fringe development is spent appropriately on resources which will benefit the community

S106 funds should be used to enhance station safety rather than on improving community spaces as outlined in the Plan.

Improving the station will benefit the broader community. Supports S106 funding to improve the station but argues that NR and GA should have the final decision about where improvements are made.

4. Seek to develop a direct route between the Fonnereau Way bridge and the station to ensure commuters have a direct route to the station away from main roads, and provide the route between the main Ipswich platform and the village when the barriers are down for extended periods.

NR agrees that station improvements are essential. Improvements can be achieved mainly through a new southern entrance and a footbridge at Westerfield Station.

Pipe, Mr and Mrs William (Landbridge)

Cites letter from clients Mr and Mrs Williams that strongly objects to allocation of their land as Local Green Space under policy WFD3-4.

Clients will bring a judicial challenge if their comments are not taken into account and amendments made.

Clause 4 of the lettersets out 4 grounds of objection. The East Suffolk Local Plan does not allocate the land for any use, particularly open space. Adjoining land has benefit of residential planning permission.

Recent appeal decision acknowledged the benefits of housing development on the site and the owners are keen to secure planning permission or housing.

Policy WFD3.4 seeks to allocate the site as Local Green Space, where development will only '...be supported in very special circumstances.' They state this is problematic because:

The land does not qualify as open space

Allocation of the land as open space is not in conformity with the Local Plan.

Allocation unreasonably restricts the owners' use of the land.

Allocating the land makes it a ransom strip for the residential planning permission on neighbouring land.

Planning law, policy and guidance

They state that the allocation is contrary to planning law, policy and guidance. It is contrary to the NPPF which requires neighbourhood plans to be in conformity with strategic policies. The allocation creates issues regarding the Planning and Compulsory Purchase Act 2004, section 38(6) concerning regard to be had to development plans and the NPPF relating to presumption in favour of sustainable development.

Objection

This allocation is unacceptable and is not supported by planning law, poly or guidance to support this allocation. The plan should be amended accordingly.

The land does not quality as local green space under NPPF, para 106.

NPPF para 106 sets out a three-point test for local green space.

The site fails to meet with part b) of the test. It is in agricultural use but is heavily overgrown. It has no special character or beauty and no records of historic significance. It is not accessible to the public.

Appeal decision identifies area of green space dividing the village in two. However, they believe land adjacent to field to

west of B1077 is a cluster of a around 11 dwellings. Addition of further dwellings would not affect its alleged openness.

The plan is not in conformity with the Local Plan regarding allocation of the land.

The local plan does not allocate this land. Allocation of this site as local green space contradicts the Local Plan, is inappropriate and should be removed.

Local green space allocation unreasonably restricts the use of the land.

Local green space designation would unreasonably hinder residential development of the site.

The neighbourhood plan would have primacy over the local plan because it is more recently adopted. Local greenspace designation in the neighbourhood plan would prevent the site from being used for anything other than local green space.

The NPPF states that there is a presumption in favour of sustainable development and that small and medium sites play an important role in meeting housing need. There is an acknowledged housing shortage across England. As such they states the allocation as a local green space should be removed.

Designation creates a ransom situation

They state the site would serve as a suitable area of open space for housing at the Old Station Works.

The developer of Old Station Works would be obliged to purchase the site at a cost in excess of that usually paid for open space. However, future developers might be unwilling to do this, which undermines the future of the Old Station Works.

They state the District Council will be concerned about the loss of Old Station Works from its housing supply calculations.

Conclusion

The landowners object to local green space allocation and submit that it should be removed. The site should be allocated for housing. If this is not appropriate, it should not be allocated at all.

Proceeding with this allocation in the neighbourhood plan will likely result in legal challenge.

Sport England	Sport England has no specific comments to make about the Westerfield Neighbourhood Plan
Suffolk County council	This response focuses on basic conditions and changes needed to proceed to referendum.
	Spatial Strategy SCC suggests that a housing strategy is needed for clarity and to comply with paragraph 8(2) schedule 4B to the Town and Country Planning Act, part A.
	Flooding SCC previously drew attention to flood risk on Local Plan site allocation SCLP12.67. This site falls within flood zone 3, which means there is a high risk of flooding. The NPPF and Town and Country Planning Act both state that development should avoid areas at high risk from flooding. The site will be developed for 20 dwellings, which means that a sustainable drainage scheme is necessary.
	Development will require a flood risk assessment and pre application discussion with East Suffolk Council to check planning requirements. The EA requires development should assess all sources of flooding and take account of climate change.
	The watercourse along the southern edge of the site will need to be accessible and incorporated into future development. The LP site allocation public open space should be used as surface water flood mitigation areas.
	The NP should be amended to require developers of the site to engage with SCC is Lead Local Flood Authority as part of early engagement and master planning.
	Health and Wellbeing
	They state that the neighbourhood plan does little to meet the needs of residents over 65 and mention should be made of adaptable homes built to the M4 (2) standard.
	Policy WFD6 should be amended to include the support for provision for M4(2) housing.
	Natural Environment

SCC is concerned about the inclusion of Swift and Bat boxes listed in point c. This is because they do not repair the loss of connectivity caused by the loss of hedgerows. They are not the same as habitat creation and could enable developers to underdeliver mitigation. SCC recommends removing the requirement for swift and bat boxes.

Public Rights of Way

Paragraph 9.5 is factually incorrect. SCC strongly advices alteration as per regulation 14 submission.

Aims and Objectives

The NPPF and Town and Country Planning Act state that policies should be clearly written. It is not clear what aim 1 is trying to achieve. The plan has not been positively prepared because it is trying to block development through the creation of a 'green belt.' There are no green belts in Suffolk and they cannot be created in neighbourhood plans, as this would breach the NPPF. The term 'green ring' is vague, unjustified and not a recognised planning term.

This aim should be amended as per wording in reg 14 submission to ensure the plan is aspirational and deliverable.

Policies Map

It is recommended that a neighbourhood plan includes a policies map. It is suggested that the map shows the parish boundary, settlement boundary, allocated housing sites, listed buildings and heritage assets, designated local green space, important views, public rights of way and other important features and facilities.

SCC suggests addition of policies to direct development that is outside of strategic policies by showing important features of the community. This is not a statutory requirement but would be useful to visual accessibility though providing a map containing all key features and facilities.

General

There is no Map 3 within the Neighbourhood Plan.

Late Responses	
Respondent	Summary of Representation

Suffolk Constabulary

Westerfield Neighbourhood Plan only makes a small reference to security but none to crime prevention. Crime Prevention Through Environmental Design (CPTED) and Secured By Design (SBD) are not mentioned.

Suffolk Constabulary endorse early input into designing out crime at concept and design and concept stage as the best way to reduce crime and the fear of crime. It is recommended SBD Homes 2024 and SBD Commercial 2024 are reviewed prior to proposals being submitted.

It is also pleasing to note that policy WFD7 seeks to reduce light pollution while also keeping streets safe.

Community Action 7 states that the Parish Council will work with other groups to provide 'safe' walking and cycling routes. They then outline how this can be achieved.

Westerfield Neighbourhood Plan should consider inclusion of a recommendation that development be built to CPTED (Crime Prevention Through Environmental Design) and Secured by Design Standards.

The following issues should be considered when any new development is considered:

Local ownership – good designs can promote a sense of local ownership and pride.

Natural surveillance – Crime can be deterred by promoting natural surveillance.

Defensible space – Define public and private space so that people know where they are allowed to go.

Access and Movement – Ensure that areas are well connected to each other and to local services. Avoid underused spaces and connections.

Parking – Create safe and secure parking as part of new developments to reduce theft from vehicles.

Permeability – Walkways should be combined with lighting, surveillance and security.

Footpaths – Should be overlooked, straight and wide to maintain good visibility. Recesses and gaps between buildings should be fenced off.

Private and Communal Areas – Well maintained public spaces encourage public participation and are a valuable resource for all ages. Poorly planned spaces increase risk of crime and be used to gain access to properties.

Street Lighting – All street lighting must comply with relevant standards. Where conflict occurs, such as in a conservation area, this should be discussed with the DOCO and local authority. Further guidance for street lights are provided.