



Wickham Market Neighbourhood Plan Referendum

Summary of Representations

This document contains summaries of the representations made in response to the publication of the Submission Wickham Market Neighbourhood Plan which was held between 9th November and 21st December 2022. The full representations were submitted to the Examiner for consideration during the Examination of the Wickham Market 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/wickham-market-neighbourhood-area/>

Respondent	Summary of representations
<p>Anglian Water</p>	<p>Anglian Water and development Plans Anglian Water is the statutory water and sewerage undertaker for the Wickham Market area.</p> <p>Anglian Water welcomes acknowledgement of previous comments in the consultation statement.</p> <p>WICK4 – Provision for Wildlife in New Development Supports policy, which provides natural management approach to SUDs. Welcomes changes made in response to previous representation.</p> <p>WICK5 – Designing for Renewable Energy and Carbon Reduction Paragraph 5.18 – Refers to Suffolk Coastal Local Plan requirement re. water efficiency (110 litres/person/day). Anglian Water supports this water efficiency standard and there should be not be any flexibility on grounds of viability. Measures such as rainwater harvesting should be encouraged to achieve water efficiency standards beyond those required in the Local Plan. Requests following text is removed:</p> <p>"However, if such provision is demonstrated to contribute towards making a development unviable then it is important that development does not</p>

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	<p>minimise the potential for such provision at a later date by the homeowners or by the Registered Provider in the case of affordable housing."</p> <p>Water efficiency reduces both carbon and water use and also reduces the amount of water being used in the home. It may be clearer if the policy read:</p> <p style="padding-left: 40px;">A. All new housing development should<u>will</u> achieve the <u>higher optional technical standard for water efficiency (110 litres/person/day) and through measures</u> such as greywater reuse, rainwater harvesting and SuDS schemes <u>are encouraged to achieve improved water efficiency for sustainable and resilient homes.</u></p> <p>This will ensure that 110 litres standard is met as a minimum with the encouragement to go further where feasible.</p> <p>Policies WICK12 and WICK13 Paragraphs 8.19 and 8.14: source protection zones are identified by the Environment Agency (https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs#find-groundwater-spzs) The Environment Agency is responsible for protecting groundwater sources from pollution.</p> <p>Action: delete 'Anglian Water'.</p> <p>Paragraphs 8.9 and 8.14 refer to provision of information about contamination in the SPZ through a preliminary risk assessment. This should be included as a policy requirement within WICK12 and WICK13.</p> <p>Conclusion Anglian Water supports the neighbourhood plan regarding sustainable drainage and water efficiency, subject to the above clarifications.</p>
<p>Berlain Ltd (Thompson Elphick)</p>	<p>Response relates to promotion of Land off Yew Tree Rise for residential development.</p> <p>'Least Impact' vs 'Most Benefit' Approach The Wickham Market Traffic and Parking Report 2004 contained a number of specific recommendations to improve the technical operation of parts of certain roads and parking in order to improve safety. However, the findings were never implemented due to budgetary constraints.</p> <p>The report suggested identifying locations for housing for approximately 130 homes over the plan period that would have 'least impact' upon highways network.</p>

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	<p>Greater relevance should be given to identifying sites that have the ‘most benefit’ in resolving deficiencies.</p> <p>Cost of works EAS transport planning provided a cost for the identified works. There are some caveats and it is possible that some further work will be needed. The use of conservation grade materials may add to the cost.</p> <p>Works identified include works to Yew Tree Rise, High Street junction due to the need to reduce parking congestion here. Cost estimate for all works is £174,000.</p> <p>Funding of the works At an earlier meeting, it was explained that funding from the new homes’ bonus would only equate to circa 30% of the works. Other potential funding could come from section 106 agreements. A Section 106 agreement on the Yew Tree Farm site would pay for improvements to two pinch points along the High Street, which would benefit the entire village. This would also have the benefit of delivering other improvements identified in the report. This cannot be said regarding other sites to the south of the village.</p> <p>A compact village improves pedestrian access, community cohesion and access to services. Priority should be given to sites such as Yew Tree Rise which provide the shortest distance on foot to the village centre.</p> <p>1989 Appeal Decision The Planning Inspectors Decision dated 8th September 1989 regarding application C88/1929. Appeal by Bovis Homes against failure to determine an application for dwellings on Glebe Allotments. It was recognised by all parties that there was no shortage of land for housing in the Woodbridge area. There is no link between this appeal decision and sites put forward by Berlain.</p> <p>For example, the inspector notes that the countryside reaches to the centre of the village and that this should be respected. Our proposal is for only 4.2 acres of the 13.4 acres site to be developed.</p> <p>Access Sole point of access to the site is from Yew Tree Rise. Proposed that improvement works to junction of Yew Tree Rise and as recommended by Town Team in Report dated April 2014. Proposals to create parking bays will also be carried out.</p>

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	<p>It is proposed that access to the allotments should be converted into a T junction rather than a 90-degree bend as previously. This will help minimise impact on allotments of extension of Yew Tree Rise, as well as use of footpath as part of the road to reduce impact still further.</p> <p>Lighting will need to be considered at a later date so as to conceal its presence when viewed from the east.</p> <p>Location of residential dwellings The development will be located in the southeast corner of the site so as to reduce landscape impact. Development will take the form of a number of outward looking ‘cells’. This will help to create safe supervised areas.</p> <p>Surfacing of public rights of way will help to encourage use and integrate them into the footpath network.</p> <p>Car Parking The proposal also includes provision of new car parking bays behind the George Public House. These are unlikely to be used by residents, as they are too far away from the proposed site, but rather for other nearby uses.</p> <p>The proposed site is likely to increase population levels by 13%. The Yew Tree Rise Proposal will increase town centre parking by 13% and is the only site to do so.</p> <p>Benefits for the George Public House Provision of a car park will benefit the viability of the George public house. Provision of parking will enable the existing car park to be converted into a garden and play area, it will also enable both patrons and visitors to park close by. It will also enable rear servicing, which will improve traffic flow next to the public house.</p> <p>Provision of a car park next to the public house will also improve access for those with limited mobility, particularly older people. This is important in village where the proportion of people aged 65-84 is twice the national average.</p> <p>Positioning the car park behind the George would also create passing pedestrian traffic to and from the town centre. This would be combined with highway improvements, which would make external seating at Andrews Café safer and more attractive.</p> <p>Effect on the allotments Plots adjacent to the northern boundary to be relocated to accommodate the new car park and access road. However, these can be relocated adjacent to other allotment sites.</p>

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	<p>Yew Tree Rise proposal could also deliver increased allotment provision to cater for increased population, again one of the few sites that could do so. There would also be investment in improvements to allotment sites.</p> <p>Type of residential development proposed There are 50 dwellings, including 35% affordable which would take the form of two-and three-bedroom homes.</p> <p>Conclusion It is recognised that the allotments are a valued asset, and the client wishes to improve them.</p> <p>There would be a loss of northern plots, but these would be compensated for by an extension of allotment space. This would lead to a net gain in allotment space. The increase in population will lead to a need for more allotment space. The Yew Tree Rise site is the only one that could deliver an increase in allotment provision.</p> <p>In assessing a site in terms of ‘most benefit’ rather than ‘least impact’ the Yew Tree Rise site is compelling. It will resolve long standing traffic issues, benefit The George Public House and provide highway safety improvements.</p>
Bruce Laws	<p>Wishes to see some control of the level of development and supports the neighbourhood plan in light of this. The views of the local community should be honoured, accepted and implemented.</p> <p>Section 5.12 – Agrees with the need to secure effective and sustainable drainage.</p> <p>Section 5.21 – Agrees that the Glebe allotments, playing field, Beehive Field, Church Pightle, the cemetery and Simon’s Cross should be protected from development.</p> <p>Section 7.2 – Agrees that public parking provision is unsustainable and action is required.</p> <p>Section 7.4 – Endorses provision of adequate on-site parking provision as part of new development. Parking in the village is insufficient and policies to encourage use of public transport have been unsuccessful.</p> <p>Section 7.14 – Endorses list of proposed traffic improvements.</p> <p>Section 8 – Endorses proposed locations of further housing development, i.e. at Old School Farm and Simon’s Cross.</p>

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	<p>Section 9.3 – Agrees strongly about the need for additional long-stay car parking. This should be essential and not just desirable.</p> <p>Would be grateful if:</p> <ol style="list-style-type: none"> 1. The Council could acknowledge receipt of this representation. 2. Inform the respondent of the outcome of the Council's deliberations.
Colin Carter (Artisan PPS)	<p>1. Introduction</p> <p>This representation relates to land off Dallinghoo Road (the Site). This representation takes the form of objections to policies WICK1, WICK 12 and WICK13. It also objects to the Housing Needs Assessment (2017) and the Site Assessment Report (2018).</p> <p>To proceed to referendum the neighbourhood plan must satisfy the basic conditions. However, the neighbourhood plan is viewed as flawed and so cannot satisfy the basic conditions. This is because of flaws in the housing need assessment as well the site selection process. It is considered that the Site should be allocated in the Wickham Market Neighbourhood Plan.</p> <p>2. Assessment of Housing Need</p> <p>The Housing Needs Assessment is more than five years old and so is out of date. It does not meet the requirement of the East Suffolk Affordable Housing SPD, which requires housing needs surveys to be less than five years old.</p> <p><u>Age of the HNA</u></p> <p>Planning Practice Guidance paragraph 41-040 states that housing needs assessments should use the most up to date evidence. Therefore, the age of the document renders it out of date and not robust.</p> <p><u>Calculation of Need</u></p> <p>The HNA uses four different projections, the first of which is based on the Suffolk Coastal Core Strategy to 2027 and household projections from 2027-2036. There are four problems with this:</p> <ol style="list-style-type: none"> i) The Core Strategy has been superseded. It does not consider the Suffolk Coastal Local Plan. ii) Policy SP2 of the Old Local Plan was found to be out of date and does not reflect the objectively assessed housing need for the area. iii) The housing need identified in the new Local Plan exceeds that in the old Core Strategy. iv) The 2012-based household projections are now significantly out of date. 2014-based figures should be used to ensure

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	<p>consistency with the more recently adopted Local Plan. More recent population projections should also be reviewed to ascertain whether this makes a difference to the assessment of housing need.</p> <p>The second approach uses only 2012 based population projections. The same comments as above also apply.</p> <p>The third approach uses dwelling completion rates between 2001 and 2011. However, it states that housing growth during this period was very low. Therefore, the approach to calculating future housing need is all based on a very low growth rate.</p> <p>The fourth approach uses completion rates between 2011 and 2016. This was a period of low housing land supply as required by the NPPF. It is unclear whether this was taken into account.</p> <p>The HNA is now out of date and needs to be revised to take account of up to date housing figures and the most recent development plan documents.</p> <p>The HNA urges caution when using the DCLG projection need figure, but this assesses population change and applies an uplift on the affordability ratio. It is therefore likely that the calculations in the HNA are no longer consistent with national policy and may no longer reflect the housing need of the plan area.</p> <p><u>Dwelling Completions</u></p> <p>The HNA subtracts 101 dwellings from calculation of need as they have been delivered. However, this relates to the period of 2011-2016 and not the period of time that the neighbourhood plan seeks to cover.</p> <p>It is not appropriate to deduct completions from before the plan period from need within the plan period. This results in an unduly low housing need figure.</p> <p>Completions and delivery rates from the last five years have not been considered. It is not possible to assess whether the approach in the HNA is still robust or supports the policies of the Local Plan.</p> <p><u>WICK1</u></p> <p>Paragraph A - Objects to allocations</p> <p>Paragraph B – Calculation of 110 dwellings is not robust and is out of date.</p> <p>Paragraph C – Merely requires compliance with the Suffolk Coastal Local Plan and is now superfluous.</p> <p>Paragraph D – Requirement is inappropriate in light of comments on Housing Needs Assessment.</p>

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	<p>3. Housing Site Selection</p> <p><u>Site Assessment Report (February 2018)</u></p> <p>The Site Assessment Report (SAR) is now out of date and omits relevant information published more recently. It needs to be reviewed to take account of the East Suffolk Housing and Economic Land Availability Assessment (SHELAA). It is also based on the Neighbourhood Planning Toolkit, 2015 and not the more recent 2021 document.</p> <p>The SAR also fails to take the protective policies of the Wickham Market Neighbourhood Plan into account.</p> <p>The SAR only includes site assessment proformas for WICK12 and WICK13 and so is incomplete. Consequently, the evidence base supporting site selection is substantially incomplete.</p> <p>WICK12</p> <p>There are significant issues with this allocation and our client strongly objects to the inclusion of this allocation.</p> <p><u>Heritage Impact</u></p> <p>The SAR fails to take account of protective policies in the Wickham Market Neighbourhood Plan.</p> <p>The proposed listing of non-designated heritage assets would not have been clear when the SAR was prepared. This explains why the proforma in Appendix A records that there are no heritage assets within or adjacent to the site. With the proposed listing of The Old School, the Parish Cemetery and Bier House this needs to be updated.</p> <p>Policy WICK8 states that there should be no substantial harm to the physical structure or setting of NDHAs without justification in a heritage statement. No such justification has been provided.</p> <p>As a result, heritage issues have not been taken into account. This should justify deletion of this allocation.</p> <p><u>Key Views</u></p> <p>Development of WICK12 would impact upon at least two, if not three key views.</p> <p>Development of the site will obscure views of the landmark church and glimpses of Wickham Market. Quality of key view 12 will be undermined and eroded by the allocation of WICK12.</p>

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	<p>Development of WICK12 would threaten Key view 11 towards Pettistree Church.</p> <p>The SAR did not take into account impact on these key views, which further justifies the deletion of allocation WICK12.</p> <p><u>Title Issues</u> Covenants on the land could prevent this site from coming forward. Further evidence is needed to demonstrate that there are no title issues.</p> <p><u>Gas pipeline</u> Title register refers to easement for gas pipeline. Evidence is needed to demonstrate that development will not impact upon this pipeline.</p> <p><u>SHELAA Assessment</u> The site was submitted as part of the East Suffolk SHELAA. This assessment identified numerous issues. Comments were also made about impact on the Wickham Market Conservation Area, impact on the Pettistree Conservation area and impact upon the cemetery. The site is also of archaeological and biodiversity interest.</p> <p>However, this was not included in the SAR. As a result, inclusion of this site as an allocation is not robust.</p> <p>WICK13 Our client objects to the allocation of this site in respect of heritage issues and the SHELAA assessment.</p> <p><u>Heritage impact</u> The SAR proforma considered that there would be no heritage impacts. However, proposed listing of the Pill Box in the northwest corner of the site was clearly not taken into account.</p> <p>There is a lack of robust evidence supporting allocation of this site and a conflict with policy WICK8.</p> <p><u>SHELAA Assessment</u> The site was considered as site 1114. There were amber scores in terms of utility, landscape, townscape, biodiversity, open space, transport and roads. Proposed designation of the Pill Box will mean historic environment green score will need to be revisited.</p> <p>4. The Site <u>Site Description</u></p>

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	<p>The site is located adjacent to Wickham Market parish boundary. There is good definition of the site frontage, and the road can be improved to serve a development of 46 dwellings.</p> <p>Part one of the Landscape Character Assessment of April 2018 identifies opportunities to improve the landscape to this part of the settlement. This would also enhance biodiversity.</p> <p>The site is part of a larger field, there are no intervening trees or hedge boundaries and is approximately level.</p> <p>There is an existing residential development on the frontage to Dallinghoo Road. Thus, the new landscaping belts brought about by development of the omission site would contain the omission site in landscape terms but also improve the present position of the area between this part of the village edge and surrounding countryside.</p> <p>The land is grade 3 agricultural land and no protective landscape designations apply. The landscape assessment does not record any important views into or out of this part of the village which require protection.</p> <p>On the western and southern boundaries new landscaping would be introduced to mitigate landscape impact and primarily to enhance biodiversity.</p> <p>The ESC Settlement Fringe Study did not consider that Wickham Market should feature as a key identified settlement of the wider Suffolk Coastal District Council that required this priority study.</p> <p>Assessment under the SAR</p> <p>Table 5-1 of the SAR assesses site 7 under reference 4b and it receives a red rating, meaning that it is not suitable for development. The SAR does not produce a proforma for all of the sites.</p> <p>The red rating stems from the SHLAA in 2014. This has been superseded by the SHELAA, 2018. The SAR is now out of date and needs to be reviewed.</p> <p>Table 5-1 states that development on this site will lead to increased traffic at a nearby pinch point and that there is no safe pedestrian route to the village centre.</p> <p>However, there is no highways evidence of problems at the nearby pinch point. Therefore, rejection of the site is unjustified and without evidence.</p>

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	<p>Development on this site could provide a footway and this removes the other objection.</p> <p>Assessment of this site is flawed, unsupported by evidence and flows from an out-of-date SHLAA.</p> <p>The Case for Site 7</p> <p>Site 7 does not have the same constraints as the two allocated sites and will not result in conflict with neighbourhood plan policies.</p> <p>Site 7 does not have any adjacent NDHAs, whereas both proposed allocations do, unlike WICK12 and WICK13.</p> <p>There are no key views across site 7, unlike WICK12.</p> <p>Site 7 is available now, is suitable for development and should be included in the Wickham Market Neighbourhood Plan.</p> <p>Appendix 1 provides an indicative layout of 46 dwelling surrounding an amenity space. It includes a variety of dwelling types, in accordance with identified need.</p> <p>Housing mix includes 16 affordable, of which seven would be single storey. Ten dwellings would be one or two bedrooms, for which there is the greatest level of need.</p> <p>There would be 30 market houses. Of these there would be 20 bungalows. There would be 7 three bed houses and only 3 four bed houses. 20 dwellings (bungalows) would be two bed dwellings, thus achieving a healthy housing mix and addressing the needs of older people.</p> <p>Allocation of site 7 is a logical extension to the built form of Wickham Market.</p> <p>The SHELAA recorded 4 amber ratings, every other rating was green. The SHELAA assessment is reproduced in Appendix 5. It concludes that the site is potentially suitable.</p> <p>Provision of a footway will remove the perceived issue of accessibility. There is no evidence that highways impacts would prevent this site coming forward. A highways assessment can confirm this.</p> <p>Surface water issues can be addressed through provision of a drainage solution.</p>

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	<p>Water recycling centre capacity issues, identified as amber, are not unique and also apply to sites WICK12 and WICK13. It is possible to develop a mini treatment works to deal with water recycling needs from site 7.</p> <p><u>Conclusion</u> The assessment of site 7 is not robust and the conclusion is incomplete. This site is much more suitable for development than both WICK12 and WICK13. Therefore site 7 should be allocated in the neighbourhood plan.</p> <p>Assessment of Basic Conditions</p> <p><u>WICK1</u> There are concerns about whether this policy satisfies basic conditions a), d) and e). The HNA predates the NPPF and is not consistent with advice in the PPG. WICK1 will therefore not satisfy condition a). It is impossible to confirm that housing needs of the parish will be met. WICK1 will therefore not contribute to sustainable development. Basic condition d) will not be satisfied. The approach to need is based on the old Core Strategy and it is not clear if there is conformity with development plan policies. WICK1 therefore does not satisfy Basic Condition e).</p> <p><u>WICK12</u> This policy does not satisfy basic conditions a), c) and d). Development will lead to the loss of key views, potential impact on two conservation areas and impact on the setting of non-designated heritage assets. Selection of the site is flawed and it will not contribute to sustainable development.</p> <p><u>WICK13</u> Development will impact on a non-designated heritage asset. This policy therefore does not meet basic conditions a) and d).</p> <p><u>The WMNP overall</u> The WMNP fails to meet the basic conditions. It fails to meet the PPG test of robust evidence, especially with regard to housing. It therefore fails to meet basic condition a).</p>

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Colin Carter (Artisan PPS Ltd)	<p>1. Background and Introduction</p> <p><u>Introduction</u></p> <p>Objections based on inappropriate allocation selection procedure, which does not use latest evidence.</p> <p>The plan fails to allocate employment land commensurate with proposed housing.</p> <p>Better, more appropriate sites are 'Land to the North of Border Cot Lane Industrial Estate and Land adjacent the BT telephone exchange' (the site). These are identified in the SHELAA as sites 785 and 1045 respectively.</p> <p>These representations are objections to policies WICK1, WICK12 and WICK13. They are also objections to Housing Needs Assessment (2017) and the Site Assessment Report (2018).</p> <p>To proceed to referendum, the Plan must satisfy the basic conditions.</p> <p>The approach of the WMNP in relation to employment land is flawed because it does not provide employment allocations in a settlement that is identified for growth.</p> <p>The approach to housing is also flawed because it cannot meet the basic conditions in relation to housing need and the selection of sites. Accordingly, it is considered that the site should be allocated in the WMNP.</p> <p><u>Site Description (Omission Site)</u></p> <p>The site is located adjacent to the settlement boundary. The site boundary is well defined and an effective landscape screen formed by the hedge onto the B1078. The frontage hedge contains farm/track access inside the 30 mph limit capable of forming vehicular access to serve both the employment site and an adjacent residential allocation of 25 dwellings.</p> <p>The site is part of a field and does not contain any intervening hedge boundaries or trees. It is 'contained' in the landscape and is not visible from any public view points and with no public access. The site is grade 3 agricultural and no landscape designations apply. Landscaping belts could be introduced along northern and western edges to mitigate landscape impact and primarily to enhance biodiversity.</p> <p>The ESC Settlement Fringe Sensitivity Study did not identify Wickham Market as a key settlement that should be included in this study.</p> <p>The part of the field that contains the proposed allocation is mainly level.</p>

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	<p><u>Indicative Proposed Site Layout (Omission Site)</u> Proposed layout is shown in appendix 2. This includes alternative access points, including by extension to employment area or use of existing farm track.</p> <p>2. Policy WICK1: Development Strategy and Principles</p> <p><u>Objection re employment land</u> Representation objects to approach to meeting future growth needs on following grounds:</p> <p><u>Employment Land Requirement</u> The Suffolk Coastal Local Plan focuses on fostering the local economy at all levels and providing the opportunity for prosperous growth. The Local Plan sets out that Neighbourhood Plans can address area specific policies relating to existing employment areas or to cater for future needs. Providing new employment development in a Neighbourhood Plan can support local and inward investment. Policies SCLP4.2 and SCLP4.5 seek to support economic growth, including in rural areas. This echoes national policy in para 84 of the NPPF.</p> <p>Employment needs have changed significantly in the last ten years, meaning that many employment sites are no longer fit for purpose. It is important that opportunities are taken through Neighbourhood Plans.</p> <p>The Ipswich Economic Area Employment Land Supply Assessment in 2017 (Lichfield Report) identified a clustering of sites in the southern part of the District along the A12 and A14. Over 40% were considered unsuitable despite being in use. Others were entirely unsuitable and filtered out. It draws attention to a number of sites that could be assessed as being deliverable or developable if further information was submitted about them.</p> <p><u>Assessment of the Land north of the Border Cot Lane Site</u> The Lichfield report was negative due to a lack of information. The key constraints were site access and availability, which were unknown.</p> <p>The landowner confirms that the site is available, and that access is achievable. Constraints identified in the Lichfield Report can be easily resolved.</p> <p>The site has good access to the A12, but it is acknowledged that it is not in a prime demand area. Nonetheless, it will help to provide growth in rural areas. The Riverside industrial estate is characterised by low vacancy levels. Due to Sizewell C the demand for construction related sites and accommodation is inevitable.</p>

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	<p>There is also demand in relation to needs in the rural area in the middle of the former Suffolk Coastal area.</p> <p><u>Employment Land Allocation and Protection of the Existing Use</u> Local Plan policy SCLP12.41 recognises the importance of the Riverside Industrial Estate to Wickham Market and the wider area.</p> <p>The WMNP should provide new employment sites to replace those lost to other uses and to meet rising demand created by Sizewell C. Flooding and water treatment issues can be resolved.</p> <p>The two omission sites should be brought forward and developed together, with the employment land made available before the development commences on the residential land. There is an element of cross subsidy but the two are not dependent on each other.</p> <p>See Appendix 2 for map of land proposed for allocation.</p> <p>Assessment of Housing Need <u>The Age of the HNA</u> The HNA is now more than five years old. The East Suffolk Affordable Housing SPD now required housing needs surveys to be less than five years old. This indicates the age of evidence that East Suffolk Council considers acceptable. The SMNP HMA is therefore out of date.</p> <p>PGG paragraph 40 states that where Neighbourhood Plans include policies about housing supply they should take account of the latest evidence. The age of the document renders it out of date and not robust. Evidence produced shows the age of the data used as opposed to the age of latest evidence available.</p> <p><u>Calculation of Need</u> The HNA uses four projections.</p> <p>a) Suffolk Coastal Core strategy to 2027 and DCLG housing projections 2027-36. This has four problems (i) The Core Strategy has been superseded. It does not consider the Suffolk Coastal Local Plan. (ii) Policy SP2 of the old Local Plan was found to be out of date and incorrect in terms of housing need. (iii) The housing need identified in the new Local Plan exceeds that in the old Core Strategy. The HNA will have underestimated the level of need for the Neighbourhood Plan area. (iv) 2012-based DCLG projections are now</p>

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	<p>significantly out of date. Review of more recent data is required. 2014-based figures should be used to ensure consistency with the more recently adopted Local Plan. More recent population projections should also be reviewed to ascertain whether this makes a difference to the assessment of housing need.</p> <p>b) The approach uses 2012 household projections (see above)</p> <p>c) The approach uses dwelling completion rates 2001-2011, when 12 units were completed. The approach used is based on very low growth over a ten-year period and is not robust for assessing housing need.</p> <p>d) Final approach uses dwelling completion rates between 2011 and 2016. This period saw constrained housing land supply, which would have constrained completions. More recent information should be considered.</p> <p>The HNA is out of date and should be reviewed using more recent data. Calculations in the HNA are no longer consistent with national policy and may no longer reflect housing need.</p> <p><u>Dwelling completions</u></p> <p>The HNA deducts 101 dwellings from calculation of need, but these were completed in 2011-2016. This does not relate to 2018-36, which the WMNP covers. It deducts completions from assessment before the period it seeks to cover.</p> <p>More recent completions have not been considered and so it is impossible to assess whether the HNA's approach is still robust.</p> <p><u>WICK1</u></p> <p>Paragraph A - Objects to allocations</p> <p>Paragraph B – Calculation of 110 dwellings is not robust and is out of date.</p> <p>Paragraph C – Merely requires compliance with the Suffolk Coastal Local Plan and is now superfluous.</p> <p>Paragraph D – Requirement is inappropriate in light of comments on Housing Needs Assessment.</p> <p>3. Housing Site Selection</p> <p><u>Site Assessment Report (February 2018)</u></p> <p>The Site Assessment Report (SAR) is now out of date and omits relevant information published more recently. It needs to be reviewed to take account of the East Suffolk Housing and Economic Land Availability Assessment (SHELAA). It is also based on the Neighbourhood Planning Toolkit, 2015 and not the more recent 2021 document.</p>

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	<p>The SAR also fails to take the protective policies of the Wickham Market Neighbourhood Plan into account.</p> <p>The SAR only includes site assessment proformas for WICK12 and WICK13 and so is incomplete. Consequently, the evidence base supporting site selection is substantially incomplete.</p> <p><u>WICK12</u></p> <p>There are significant issues with this allocation and our client strongly objects to the inclusion of this allocation.</p> <p><u>Heritage Impact</u></p> <p>The SAR fails to take account of protective policies in the Wickham Market Neighbourhood Plan.</p> <p>The proposed listing of non-designated heritage assets would not have been clear when the SAR was prepared. This explains why the proforma in Appendix A records that there are no heritage assets within or adjacent to the site. With the proposed listing of The Old School, the Parish Cemetery and Bier House this needs to be updated.</p> <p>Policy WICK8 states that there should be no substantial harm to the physical structure or setting of NDHAs without justification in a heritage statement. No such justification has been provided.</p> <p>As a result, heritage issues have not been taken into account. This should justify deletion of this allocation.</p> <p><u>Key Views</u></p> <p>Development of WICK12 would impact upon at least two, if not three key views.</p> <p>Development of the site will obscure views of the landmark church and glimpses of Wickham Market. Quality of key view 12 will be undermined and eroded by the allocation of WICK12.</p> <p>Development of WICK12 would threaten Key view 11 towards Pettistree Church.</p> <p>The SAR did not take into account impact on these key views, which further justifies the deletion of allocation WICK12.</p> <p><u>Title Issues</u></p> <p>Covenants on the land could prevent this site from coming forward.</p>

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	<p>No title plan was available but it is potentially fatal to this site coming forward. Further evidence is need to demonstrate that there are no title issues.</p> <p><u>Gas pipeline</u> Title register makes reference to easement for gas pipeline. Evidence is needed to demonstrate that development will not impact upon this pipeline.</p> <p><u>SHELAA Assessment</u> The site was submitted as part of the East Suffolk SHELAA. This assessment identified numerous issues. Comments were also made about impact on the Wickham Market Conservation Area, impact on the Pettistree Conservation area and impact upon the cemetery. The site is also of archaeological and biodiversity interest.</p> <p>However, this was not included in the SAR. As a result, inclusion of this site as an allocation is not robust.</p> <p><u>WICK13</u></p> <p>Our client objects to the allocation of this site in respect of heritage issues and the SHELAA assessment.</p> <p><u>Heritage impact</u> The SAR proforma considered that there would be no heritage impacts. However, proposed listing of the Pill Box in the northwest corner of the site was clearly not taken into account.</p> <p>There is a lack of robust evidence supporting allocation of this site and a conflict with policy WICK8.</p> <p><u>SHELAA Assessment</u> The site was considered as site 1114. There were amber scores in terms of utility, landscape, townscape, biodiversity, open space, transport and roads. Proposed designation of the Pill Box will mean historic environment green score will need to be revisited.</p>
East Suffolk Council	<p>The Council is particularly supportive of approach taken to allocating land for housing. This aligns with Suffolk Coastal Local Plan policy SCLP12.1 (Neighbourhood Planning).</p> <p>Chapter 2 – Local Context Include reference to proposed Sizewell C park and ride.</p>

Respondent	Summary of representations
	<p>Chapter 4 – Development Strategy Paragraph 4.4/4.5 – Proposed alterations to settlement boundary to incorporate site allocations. This approach aligns with that in Suffolk Coastal Local Plan. For clarity, state that the Settlement Boundary in the neighbourhood plan will be superseded by the one in the Suffolk Coastal Local Plan.</p> <p>Chapter 5 – Landscape and Environment Paragraph 5.5 – Remove ‘draft’ from Suffolk Coastal Local Plan.</p> <p>WICK4: Provision for Wildlife in New Development The mitigation hierarchy should be referenced to align with national and local policy. Use of ‘minimise’ does not add anything.</p> <p>Paragraph 5.18 – It is understood that the second half of the paragraph refers to solar panels rather than water efficiency. This part of the sentence is confusing and should be deleted. Meeting standards for water efficiency is unlikely to harm viability.</p> <p>Chapter 6 – Historic Environment Paragraph 6.6 – policies not represented in full capitals.</p> <p>Chapter 7 – Transport and Movement Further references to Sizewell would be appropriate, now that the Sizewell C DCO has been granted.</p> <p>Additional references would help with conformity with the Suffolk Coastal Local Plan, in particular, policy SCLP3.4 (Proposals for Major Energy Infrastructure Projects).</p> <p>EDF has been investigating options for traffic mitigation. This could better be reflected in paragraphs 7.11 and 7.14 to explain proposals for cycle and pedestrian improvements are being considered to mitigate impact of the southern park and ride.</p> <p>Chapter 8 – Site Allocations The Council supports the Parish Council in allocating housing sites in the neighbourhood plan. Evidence provided for housing allocations is the 2018 Site Assessment Report and the 2022 Sustainability Appraisal and Strategy Environmental Assessment, as well as the Consultation Statement.</p> <p>Paragraph 8.3 – Typo – Paragraph 8.3 missed. Paragraphs 8.9/8.14 – First two sentences do not read well.</p> <p>WICK12 – Land at Old School Farm</p>

Respondent	Summary of representations
	<p>Map showing site should be included. Criterion c refers to the western site of the allocation and is not needed.</p> <p>WICK13 – Land at Simon’s Cross Map would be beneficial.</p> <p>Policies Maps The Council has noted small differences between the Settlement Boundary on the WMNP policies map and the Local Plan policies map. The Council has provided a corrected version of the neighbourhood plan settlement boundary.</p> <p>Community Governance review has resulted in the alteration the Wickham Market parish boundary so that it includes Wickham Gate, which is currently in Pettistree parish. This will come into effect on 1st April 2023.</p>
<p>East Suffolk Internal Drainage Board (Water Management Alliance)</p>	<p>Wickham Market falls partly within the Internal Drainage District of East Suffolk Internal Drainage Board.</p> <p>Recommend an applicant proposing a discharge or any other works affecting a main river contact the Environment Agency.</p> <p>Request the Board is consulted as planning applications come forward for the allocated sites.</p> <p>Sites WICK12 and WICK13 fall outside of the Board’s Internal Drainage District. The Board would however comment to promote sustainable drainage.</p> <p>Please be aware of the following:</p> <p>Byelaw 3 – Discharge of surface water into the Board’s District</p> <ul style="list-style-type: none"> • Infiltration should be supported by ground investigation to determine infiltration potential and depth of groundwater. BRE Digest 365 is recommended to determine efficiency, where on site material is proposed. • If discharge to a watercourse is necessary this must be undertaken in line with the Board’s byelaws. Consent is conditional on payment of a Surface water Development Contribution Fee. • Surface water discharge to a sewer should be in line with the drainage hierarchy. <p>Byelaw 3 – Discharge of treated foul water into the Board’s District.</p> <p>Discharge of treated foul water to a watercourse will require land drainage consent.</p>

Respondent	Summary of representations
	<p>Byelaw 10 – Works within 9 metres of Board Maintained Watercourse</p> <p>Works within 9 meters of a Board maintained water course will require consent.</p> <p>Section 23 of Land Drainage Act (1991) and Byelaw 4 – Alterations proposed to a watercourse</p> <p>Works to board-maintained watercourses will require consent. Works to alter riparian watercourse will require consent.</p> <p>Recommended consent should be sought prior to determination of a planning application.</p> <p>For development outside the Board’s IDD but in the watershed catchment, where surface water has the potential to impact the internal drainage district, we recommend:</p> <ul style="list-style-type: none"> • Viability of infiltration proposals should be evidenced. Proposed strategies should be supported by ground investigation. Infiltration testing inline with BRE 365 should be used to assess on-site material. • Discharge to a watercourse should be facilitated in line with Non-Statutory Technical Standards for Sustainable Drainage Systems, typically S2 and S4. Discharge should be attenuated to greenfield runoff rates where possible. <p>These recommendations are intended to promote sustainable development and minimise flood risk. Reference should be made to relevant regulators for drainage and flood risk. Consent will be required from regulators and so they should be included in the plan.</p>
Historic England	Historic England has no comments to make at this stage but wishes to be informed when the plan is ‘made’.
Jeffrey Hallett	<p>General</p> <p>Overall, this is an excellent document that is clearly written.</p> <p>3. Local Context</p> <p>2.6 - Restoration of the George public house has distracted from improvements to the village hall.</p> <p>2.8 - Surprised that local businesses have not require land on which to expand in the future. The business survey should be updated to take account of changing circumstances.</p>

Respondent	Summary of representations
	<p>2.10 - There is concern about loss of the Post Office and the need to provide parking for users. Pinch points near to the Post Office also need to be removed.</p> <p>5.3 - This section makes no mention of 'quiet lanes.'</p> <p>5.5 - Supports measures to ensure that Wickham Market and Pettistree remain separate.</p> <p>5.6 - The Sizewell C park and ride will increase traffic through the village. This will include Sizewell traffic, as well as traffic trying to avoid congestion.</p> <p>5.12 and 5.13 - Development requires safe and acceptable drainage. Plastic crate SUDs are ineffective and surface lagoons present a risk to children, unless unsightly fencing is used.</p> <p>5.17 and 5.18 - Strongly supports use of solar panels and reuse of domestic water.</p> <p>5.23 – It is helpful for local green spaces to be listed and shown on the map.</p> <p>6.12 - Supports listing and identification of non-designated heritage assets.</p> <p>7. Transport and Movement There is no certainty that measures required from development will solve transport problems or those expected from future development.</p> <p>8. Site Allocations Supports two housing allocations and restrictions on access from the B1078 are sensible.</p> <p>9. Actions and Investment Priorities Explanation of how CIL money will be spent is helpful.</p>
John Day	<p>2.3 – Confirms historic status of village and provides grounds for development as a heritage centre. The village is pleasant for both residents and visitors.</p> <p>5.10 – The target for 70 homes will be subject to Government revision and may mostly be met by the allocation at Simon’s Cross.</p> <p>3.1.5 – Historic character of the village should be retained. Village centre businesses require footfall, which is dependent on parking arrangements.</p>

Respondent	Summary of representations
	<p>3.1.6 / 7.2 / 7.5 / 9.3 – On street and off-street parking is not covered in the plan. Yet this is a major factor in viability of village centre. The neighbourhood plan should include a considered solution to parking. This will put pressure on those responsible for parking provision to seek a solution.</p> <p>3.1.6 – Traffic proposals listed in paragraph 7.14 require stronger status in the Plan, perhaps as ‘proposed works to be carried out, subject to revisions.’</p> <p>3.2/18 – Traffic calming, to reduce speeds and pollution, should be encouraged.</p> <p>4 – There needs to be a higher ration of first-time buyer houses, which will attract families. Social housing alongside market housing provides a better mix.</p> <p>Relaxation of village housing targets should help Wickham’s allocation as it is gripped by traffic flow restrictions. Fewer smaller residential units should balance the population mix and help fill school places and provide an active workforce.</p> <p>8.10 – Land at Simon’s Cross is accessible and ideal for families. It is preferable to alternative sites.</p> <p>4.5– Policy WICK1 d) – should be mandatory to prevent fragmented designs. Buildings from different eras are often clustered together to create distinct housing areas.</p> <p>5.2 – Views of the church spire should be preserved, especially from footpaths and the recreation ground.</p> <p>6.4 – Restrictions on back garden developments should be extended to properties near the conservation area to prevent views of the conservation area from being harmed.</p> <p>6.7 – Review of the conservation area may support the above observation.</p> <p>6.9-6.11 – Asking residents to nominate non-designated heritage assets may encourage public participation.</p> <p>7. Transport Many transport issues remain unresolved. Measures listed in paragraph 7.14 should be upgraded from ‘proposed’ to ‘necessary’ to aid funding. SCC should be asked if they have undertaken a safety review.</p>

Respondent	Summary of representations
	<p>All improvements listed in 7.14 are valid. Continental villages use narrower and tighter turns to slow traffic. A prime location would be the turning from the High Street into the Market Square. This could be added to the lists in paragraphs 7.7 and 7.14.</p> <p>Believe there is no access to the A12 Southbound in order to prevent a build up of traffic in the centre of Wickham Market.</p> <p>The Sizewell C park and ride will create additional problems. Making the village a 'slowly but safely' area will help reduce its use as a cut through for motorists. Modifications in paragraph 7.14 can be adjusted to make Wickham Market a destination, rather than a cut through.</p> <p>9.5 – There is a need to consider teenagers in the village. There is a need for more facilities for teenagers and young people. This would show the community is trying to understand the needs of all the population.</p>
Martin Corrall	<p>Objects to proposals to build 85 homes at Old School Farm. Further residential development is inappropriate until road improvements are made, including better footpaths and 20 mph zones.</p>
National Grid (Avison Young)	<p>National Grid has identified that none of its assets are affected by allocations within the Neighbourhood Plan area. The representation provides links to information about assets within the neighbourhood plan area. It also provides guidance about electricity assets, in particular overhead electricity lines, as well as the high pressure gas pipeline network.</p>
Natural England	<p>Natural England supports comments relating to payments from development at Old School Farm and Simon's Cross towards the Suffolk Coast Recreational Disturbance Avoidance Mitigation Strategy (RAMS).</p> <p>Commends policies identifying the need for well-designed open space and green infrastructure.</p> <p>Therefore, Natural England has no objections to the plan submitted.</p> <p>Natural England adds that a RAMs payment alone is not considered sufficient to mitigate adverse impacts on European Designated sites and recommends developments should include well-designed open space / green infrastructure. The majority of recreation should be contained on site or there should be bespoke mitigation measures.</p> <p>Annex 1 provides information about neighbourhood planning and the natural environment. This includes further sources of information, such as the Magic website, as well as information about different landscape and natural environment designations.</p>

Respondent	Summary of representations
	The Annex also provides a summary of information about natural environment issues to consider when preparing a neighbourhood plan, as well as measure that can be taken to protect and enhance the natural environment.
Ruth Grant	There is a pavement only along the western end of the southern entrance to the village. This pavement is narrow. There is no pavement along the eastern side of the road, where there is new housing development. There is no crossing and school children will have to cross the road. The hatched section in the middle of the road could be removed to create space for an additional pavement. Pedestrian crossings could also be installed.
Simon Harrington	<p>Paragraph 7.14, bullet point 7 –</p> <p>Disagrees with piecemeal approach. 20 mph speed limits should cover all of the area identified as hazardous for cyclists and pedestrians. A ‘shared space’ approach is required, which requires slower traffic and a new relationship between pedestrians and vehicles, where they have equal rights to the space.</p>
Suffolk County Council	Suffolk County Council thanks the neighbourhood plan group for making suggested changes. SCC has no comments to make at this stage but wishes to be kept informed of future progress.
Suffolk Fire and Rescue Service	The plan will not result in the need for additional service provision. Encourages the installation of automated sprinkler systems in new development. No objection regarding access provided this is in accordance with Building Regulations. The water supply should be sufficient to enable firefighting.
Suffolk Wildlife Trust	<p>WICK4 refers to enhancing green infrastructure as part of SUDs provision but this is not sufficient to establish coherent ecological networks as required by the NPPF. Government policy requires the linking up of areas of high wildlife value. Simply protecting isolated areas is no longer sufficient.</p> <p>The Neighbourhood Plan does not meet the requirements of NPPF paragraph 179 because it does not identify wildlife rich habitats, wildlife corridors and stepping stones and there is no reference to conserving and restoring priority habitats as required by the Natural Environment and Rural Communities Act, 2006. It is suggested to insert a map into the plan that meets the requirements of 179a). WICK4 should be amended, or a policy inserted, to cover these aspects.</p> <p>Policy 4: Biodiversity and Green Corridors A good example from another neighbourhood plan is provided. It states that:</p>

Respondent	Summary of representations
	<p>a) Development in a green corridor must deliver net gains in biodiversity, which exceed national or local policy requirements or deliver qualitative improvement on the site or to the corridor. This should relate to quality of habitat or its ability to facilitate the movement of flora and fauna.</p> <p>b) Proposals adjacent to green corridors must maintain and where possible enhance the function of the corridor and demonstrate how they will mitigate harm to the wildlife using it.</p> <p>c) Proposals that support improvement to the function of a green corridor will be looked on positively.</p> <p>d) If development needs to mitigate net gain offsite, then the requirement will be to deliver this net gain in the identified green corridors, working with local landowners. Consideration of need will be given to the impact that allocated sites within the local plan have on green corridors.</p> <p>Information on priority habitats and species can be obtained from the Suffolk Biological Information Service.</p>
Ufford Parish Council	Ufford Parish Council supports the Wickham Market Neighbourhood Plan.

Additional Consultation

During the Examination a further consultation was held in relation to the Site Assessment Report. This additional stage of consultation lasted for three weeks and ran between 9th May 2023 and 30th May 2023. The consultation was open to those who commented on the submission consultation. Full comments to the additional consultation can be accessed via the following link: <https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/wickham-market-neighbourhood-area/>

Respondent	Summary of representations
Berlain Ltd (Consilium Land Ltd)	<p>Introduction</p> <p>It is essential that evidence is robust and consistent.</p> <p>The Call for Sites process is a core discipline, and many Councils go through a rigorous and time consuming process. This enables a plan making body to understand the aspirations of a landowner, potential site constraints and to judge whether there is a realistic prospect of it being developed.</p> <p>There is inconsistency in the supporting reports for the Neighbourhood Plan.</p> <p>WICK13 is subject to a ransom and WICK12 potentially unavailable.</p> <p>The omission of a call for sites is a fundamental flaw.</p>

Respondent	Summary of representations
	<p>A copy of the pre-submission consultation response (March 2019) is attached.</p> <p>My contention is that the Neighbourhood Plan Steering Group were not interested in a call for sites exercise.</p> <p>The lack of consistency is symptomatic of the negative basis upon which the Plan has been prepared.</p> <p>Wishes to be notified of East Suffolk Council’s Decision about whether to accept the Examiner’s recommendation and future progress with the neighbourhood plan.</p> <p>Summary of attached pre submission consultation response:</p> <p>The content of a Neighbourhood Plan is legally required to comply with the basic conditions and other matters set out in the Town and Country Planning Act 1990. The NP fails to meet basic condition a).</p> <p>Guidance issued by the Secretary of State sets out that proportionate, robust evidence should support the choices made and the approach taken.</p> <p>My contention is that robust evidence has not been obtained. Important information has been ignored, key choices are inadequately supported and important information has not been collected.</p> <p>A decision was reached by the Parish Council on the unsuitability of the sites (refs 881 / 878) before any information had been collected. SCDC officers had favourably assessed the sites if the allotments could be relocated. The trajectory accompanying the 2018 SHELAA shows the site 878 as being capable of delivering 80 dwellings commencing in 2022/23. Misinformation was also provided to Aecom.</p> <p>The Aecom report pre-dates the Landscape Sensitivity Assessment by 2 months. The latter does not preclude development and states the sites has moderate landscape value.</p> <p>In 2105, consideration of benefits of developing site 878 were effectively blocked.</p> <p>WICK6 does not preclude proposals for built development in areas such as Glebe allotment.</p> <p>Old School Farm Site</p>

Respondent	Summary of representations
	<p>The site assessment criteria have not been consistently applied, in relation to safe pedestrian routes to school.</p> <p>Proposed car park</p> <p>Safe pedestrian access cannot be secured – the policy should be deleted.</p> <p>Simons Cross Allotment Site</p> <p>This site was not presented to the NP Committee until October 2017. There is a contrast between the favour shown to this site and proposals for sites 878 and 881.</p> <p>Deficiencies in evidence</p> <p>Land registry data and viability evidence has not been collected. There is a ransom strip between 57 and 59 Simons Cross. The Simons Cross site can accommodate 40 dwellings, not 25, but there is no evidence against which the conclusion has been reached. A more thorough assessment of viability and traffic impact is needed.</p> <p>Pettistree proposal</p> <p>The opportunity still exists to extend the NP area to bring the proposed Local Plan allocation back to the WMNP to consider.</p> <p>General points:</p> <ul style="list-style-type: none"> a) WICK1 C is not a local policy. It refers to the July 2013 Suffolk Coastal Local Plan under which 60% of market housing should be 3 and 4-bedroom dwellings. 43% of affordable housing is to be made up of 1-bedroom dwellings. This conflicts with the evidence produced by AECOM, which states that 1 and 2-bedroom units are to be encouraged. A higher proportion should be targeted to the younger demographic. b) The neighbourhood plan is not compliant with NPPF paragraph 68 because it fails to identify smaller housing sites of less than 1 hectare. c) The neighbourhood plan is not compliant with NPPF paragraph 35 because it does not seek to address the area’s objectively assessed needs. The AECOM Housing Need Assessment shows a need for 211 dwellings. The 110 dwellings provided for in the NP will likely be insufficient.

Respondent	Summary of representations
	<p>d) Wickham Market is a 'key service centre' but there is no public house. The George was burnt down in 2013 and it is hoped that the community can purchase and restore it. There are no neighbourhood plan policies to help achieve this. There is only one site (881) that could provide a car park and play area, but the neighbourhood plan group has discounted this.</p> <p>e) The neighbourhood plan takes a very narrow view of trip generation due to its emphasis on keeping traffic out of the village centre. Table 1.1 recommends a desirable walking distance of no more than 400 metres. However, WICK13 and the Pettistree site are both more than 400 metres from the centre of Wickham Market. Site 776L/881 is closer to the centre of the village. The neighbourhood plan fails basic condition a) because evidence does not support the choices made and the flawed logic cannot explain the intention and rationale of the policies.</p> <p>f) The neighbourhood plan fails to address future employment needs. The WMPC should have evaluated the scale of the provision that was needed and examined alternative sites that were deliverable.</p>
<p>East Suffolk Water Management Board (Water Management Alliance)</p>	<p>The Board has no comments to make. Please note that the Board has been reconstituted and is now the East Suffolk Water Management Board. Comments submitted in February 2023 to the Submission consultation are attached.</p>
<p>Michael Hughes</p>	<p>East Suffolk Council documents are difficult to read. Reference is made to 'footnote 3 on page 36', with an error in section 4.1. Yet the link displays page 37. Page 36 cannot be found. Section 4.1 on page 37 is nothing more than a statement of fact.</p>
<p>Natural England</p>	<p>Natural England does not have any comments about the Wickham Market Neighbourhood Plan Additional Consultation.</p>