

Responses to Wickham Market Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 9 November 2022 to 21 December 2022

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What is the purpose of this document?

Wickham Market Parish Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 9th November 2022 to 21st December 2022.

Following the closure of this consultation, it became apparent that a small number of consultees had not been notified of the publicity period. These consultees were also given a six-week opportunity to submit a representation. One additional representation from the East Suffolk Internal Drainage Board was received, and this document has been updated to include that representation.

Anglian Water

1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.
- 1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

2. Anglian Water and Neighbourhood Development Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for the Wickham Market neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources.

3. Commentary on the Wickham Market Neighbourhood Plan

- 3.1. Anglian Water welcomes the opportunity to comment on the Wickham Market Neighbourhood Plan, having previously commented on the draft Neighbourhood Plan (Reg.14) iteration. We welcome the reference to our comments in the Consultation Statement and that these were addressed in this subsequent version of the Plan.
- 3.2. The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development.

WICK4 - Provision for Wildlife in New Development

- 3.3. We welcome the supporting text set out in paragraphs 5.12 - 5.15 regarding effective sustainable drainage systems (SuDS) and biodiversity - this reinforces the natural flood management approach to SuDS to provide multi-functional benefits for the local community including opportunities to utilise rainwater harvesting and greywater reuse.
- 3.4. We support this policy and welcome the amendments proposed in relation to our previous consultation response.

WICK5 - Designing for Renewable Energy and Carbon Reduction

- 3.5. Paragraph 5.18 - we note that this paragraph refers to the Suffolk Coastal Local Plan policy requirement for all new housing to achieve the optional technical standard for water efficiency (110 litres/person/day). We support this approach given the region is identified as an area of serious water stress, and we consider that meeting this requirement should be imperative and there should not be any flexibility to avoid meeting this standard on grounds of viability. Recent evidence shows that the cost of meeting this standard through a fixtures/fittings approach is minimal and therefore **we would request that the following text is removed from the paragraph:** *"However, if such provision is demonstrated to contribute towards making a development unviable then it is important that development does not minimise the potential for such provision at a later date by the homeowners or by the Registered Provider in the case of affordable housing."*
- 3.6. Measures such as rainwater harvesting and greywater reuse should be encouraged to achieve more ambitious water efficiency levels (beyond 110 litres/person/day) in new homes, and we would support this approach.
- 3.7. POLICY WICK5: We support this policy approach and welcome any measures which improve on water efficiency as this helps to reduce water use and supports reduction of carbon emissions through the treatment and distribution of water but also through less water being used in the home, particularly in terms of water heating. **Given our comments on the wording for paragraph 5.18 it may be clearer if the policy stated:**
- A. All new housing development ~~should~~ **will** achieve the **higher optional technical standard for** water efficiency **(110 litres/person/day)** ~~and through measures such as:~~ greywater reuse, rainwater harvesting and SuDS schemes **are encouraged to achieve improved water efficiency for sustainable and resilient homes.**
- 3.8. This ensures that the 110 litres standard is met as a minimum with encouragement to go further where feasible. We are seeking to develop an evidence base to support Local Plans and Neighbourhood Plans to go further in their water efficiency requirements, however we are only in the early stages of this work. We therefore support the ambition of parish councils in preparing neighbourhood plans that recognise and seek to address such issues.

Policies WICK12 and WICK13

- 3.9. **Paragraphs 8.9 and 8.14:** Factual correction - source protection zones are identified by the Environment Agency (<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs#find-groundwater-spzs>). Whilst we rely on groundwater for abstraction of drinking water in many areas of our region and the protection of these areas from pollution, the EA is responsible for protecting groundwater sources used to supply drinking water from pollution.

Action: delete "Anglian Water"

- 3.10. Furthermore, as paras. 8.9 and 8.14 refer to the provision of sufficient information to satisfy the decision maker that any risks of contamination within the SPZ have been assessed through a Preliminary Risk Assessment - then **we consider that this should be included as a policy requirement within POLICY WICK12 and POLICY WICK13.**

4. Conclusion

- 4.1. Anglian Water supports the direction of the Neighbourhood Plan with regard to sustainable drainage systems and water efficiency measures, subject to the clarifications we have suggested in our response.

Berlain Ltd (Thompson Elphick)

Submission to Wickham Market Parish Council Neighborhood Plan Team and Community Pub Project Group by Andrew Dutton BA (Hons) MRTPI on behalf of Berlain Ltd 20th December 2016

Introduction

Following my attendance at the Neighborhood Plan meeting for Wickham Market on 6th November I undertook to consider the issues raised and to comment further with regard to the implications of the information received both at and following that meeting, for the promotion of Land off Yew Tree Rise for residential development, for my client Berlain Ltd.

At the meeting the campaign for the acquisition and renovation of the George PH was also outlined by the Community Project Group and I should like to set out here a response to the ongoing consultation for this project also.

‘Least Impact’ vs ‘Most Benefit’ Approach

The Neighborhood Plan Team clearly has a significant responsibility to plan for the future and to ensure it is better than the present. This is a worthy aim but I wonder if in discharging this responsibility the Team are starting from the correct premise.

A detailed study by the Town Team of traffic and pedestrian safety issues in the village, completed in April 2004, was supplied to me at the meeting, Wickham Market Traffic and Parking Report 2014. This report was endorsed by the County Council and the local Police and contained a number of specific recommendations to improve the technical operation of parts of certain roads and parking in order to make the village a safer place.

It was explained that funding for the identified works was sought but despite the endorsement, the County Council (due to their own budget constraints) denied this request.

Having identified a number of existing highway problems the premise expressed at the meeting was that the search for suitable sites upon which to accommodate circa 130 homes over the plan period should give great weight to sites that would have the ‘least impact’ upon these deficiencies.

My professional opinion is that it is that greater relevance should be given to the identification and selection of residential sites that have the ‘most benefit’ in resolving the identified deficiencies. This may be seen as counter intuitive and as such requires a further explanation that I set out below by first considering the financial cost of the Works identified by the Traffic and Parking Working Group and then by looking at the ability of the Parish/District Council to secure funding for these works.

The Cost of the Works

Following receipt of the report we instructed EAS Transport Planning to provide us with a cost for the identified Works. Clearly there are a number of caveats to state due to the lack of detailed designs or investigations of the need for service diversions (though some helpful comments are made in the report following a visual inspection of drainage). In addition it may well be the case that further design work may result in the upgrading of materials (for example to carry out works to the High St, George to Revetts) to a conservation area grade of material would add significantly to the cost.

You will also see that to the Works identified in the report EAS has extended the area of works to the Yew Tree Rise, High St Junction as we feel that parking at this junction could not only be eased by parking regulation (as proposed by the Town Team) but also by the creation of parking bays.

A copy of the letter to us from EAS is attached. In this report the figure identified for carrying out all of the works (subject to the caveats above) is £174,000

Funding for the Works

At the 6th November meeting it was explained that as a result of accommodating homes over the plan period the Parish would only have made available to it from the New Homes Bonus circa £55,250 which is circa 30% of the sum required to complete the safety Works. (ie 130 homes x average of £1,700 per home in New Home Bonus with 25% of this sum available to the Parish) In other words the Parish would face a shortfall somewhere in the order of £118,000 to be funded from elsewhere (ie £174,000 less £55,250)

One other potential source of funding is directly from the landowner/developer under Section 106 of the TCPA however this has its limitations. Section 106 Planning Obligations were established in the Town and Country Planning Act 1990 (as amended). Current Central Government guidance on such Obligations was contained in the Community Infrastructure Levy Regulations 2010 and has been more recently confirmed in the National Planning Policy Framework in 2012 (notably Paras 203 to 206) These two documents set out the core principles underpinning the planning obligations ideology. To be considered legally sound, obligations must comply fully with all 3 of the following tests:

To be lawful, planning obligations need to be:

- 1) necessary to make the development acceptable in planning terms
- 2) directly related to the development;
- 3) fairly and reasonably related in scale and kind to the development.

It should be noted that the use of planning obligations is strictly governed by the basic premise that planning permission may not be bought or sold. What this means is that the

developer/landowner can only be lawfully required to fund Works where they have a direct impact and the extent of contributions made (or works carried out in lieu of contributions) is limited to the scale of impact they have.

Applying this to the choice of sites in the village it can be seen that in the case of Yew Tree Rise, which lies between two pinch points and would therefore discharge traffic either way along the High Street, it is lawful to require it to fund works along both routes of the additional traffic it generated. This would encompass much of the Works that are identified in the report which, once completed, would benefit the entire village.

The same cannot be said of many other potential sites for example the choice of sites to the south of the village. The very reason that they may be considered (i.e. 'least impact') is the same reason that funding for the Works will not be forthcoming from them.

Pursuing a 'least impact' rather than 'most benefit' approach is also leading to the consideration of unsuitable sites that do not function well from a planning point of view. It has been long accepted that a compact settlement offers the best opportunities for interaction by pedestrians, enhancement of social cohesion and ease of access to central services. In view of this the priority should be given to sites within the shortest distance on foot to the village centre such as Yew Tree Rise.

1989 Appeal Decision

I was presented with a Planning Inspectors (J Richardson) decision dated 8th September 1989 regarding application No.C88/1929. The decision related to an application by Bovis Homes against Suffolk Coastal District Councils failure to determine an application for an unspecified number of residential dwellings on the Glebe Allotments. It was also recognised in the appeal by all parties that there was no shortage of housing land and that at least a five-year housing supply existed for the Woodbridge area.

The Inspectors report was kindly supplied by Anne Westover. In supplying the report there was no suggestion that there was any direct link between this appeal decision of nearly 30 years ago and the proposals by my client (Berlain Ltd) which is for the land adjacent to the allotments. Berlain Ltd has never proposed that the Glebe Allotment site is developed, quite the contrary, they have proposed retention and reinvestment in situ.

The reason for the Inspectors report being supplied was that it was thought that there may be general comments made in relation to such issues as landscape setting (Anne is a qualified Landscape Architect) that may still be of relevance.

Having now had an opportunity to consider the comments made we agree that the report may have some limited relevance. For example the Inspector (Mr Richardson) commented on "The merging of agricultural fields with allotment land on the eastern approaches to the village" which " ... gives the impression of countryside reaching nearly to the heart of the

settlement". Mr Richardson thought that this should be respected (Para 7). We have walked the Deben Valley and viewed the site from the various footpaths and vantage points mentioned by the Inspector and have designed into the attached proposal with this comment in mind. Our proposal (see attached plan from RUA) is for only 4.2 acres of the 13.45 acre site to be developed.

Description of Berlain Proposals



Fig 1. Berlain Development Proposal (NB Larger plan also supplied)

Access

The sole point of access to the site is from Yew Tree Rise. It is proposed that works will be undertaken to the junction of Yew Tree Rise and High Street as recommended by the Town Team in their report of April 2014. In addition it is proposed that further works to create parking bays are also carried out with a view to removing parked cars on the carriageway at this junction.

The form of access into the allotments has been converted to a 'T' Junction instead of the previously advised 90-degree bend. This creates the opportunity to minimize the impact on the allotments of the extension of Yew Tree Rise as the road can be brought closer to the northern boundary. It also offers the opportunity to consider the use of the existing footpath as part of the road thereby reducing its impact still further. There will be no vehicular access or egress from Spring Lane.

Lighting of the access way will need to be carefully considered at a later date as will its profiling and landscaping as it crosses the open space in order to conceal its presence when viewed at a distance from the east.

Location of residential dwellings

The residential dwellings have been located in the South East corner of the site as in this location the development is obscured from views from the East. The precise boundary will need to be established by further detailed assessment at a later date. The form of development is a number of outward looking 'cells' with residential development facing the new road, Spring Lane or adjacent open space. This will create safe supervised areas.

Surfacing of the two existing PROW to the west of the development site will be improved in order to encourage their use by the new residents and to integrate the development into the footpath network.

Car Parking

The proposal also provides for new additional parking (circa 12 bays) directly behind the George Public House. This would be for general use by the pub, allotment holders, visitors (who are unable to park in the square on market days), and existing residents. The new bays are unlikely to be used by the new residents as they are some distance away from the new homes and parking for these homes will be accommodated within the developable area proposed.

The population of village is around 2300 people. An additional 130 homes at an occupancy rate of 2.4 persons per household gives 312 persons – i.e. a 13% increase in population. In order not to exacerbate existing car parking problems when visiting the Market Square an additional 13% increase in the current car parking capacity should also be provided in close proximity to the village square. The Yew Tree Rise proposal directly addresses this problem and is probably the only site that could do so.

Benefits for the George Public House

In the early part of my career I was employed as the Area Manager for 52 Public Houses in North Devon on behalf of Grand Metropolitan. The North Devon area is not entirely dissimilar to Wickham Market, both are attractive rural and coastal locations with occasional vacation traffic.

The benefit to a Public House of being able to cater for a wide range of customers needs is vital to their commercial success. The provision of the car park will have a beneficial effect on the commercial viability of the George. It will create the opportunity for the existing car park to be converted into a garden/play area whilst expanding the ability for staff and customers to park nearby. In winter months many Public Houses survive by reliance on inter

house team games. Having an adjacent car park that is large enough to accommodate visiting teams is extremely important in being able to capture the revenue from this source.

Providing a new vehicular rear access will also offer the potential to remove the need to use the existing vehicular access, which would improve the safety of this narrow part of the High Street that is already acknowledged by the Town Team as experiencing some traffic difficulties.

Deliveries to the George will also be improved upon by rear servicing. If the George becomes the successful venture that the Pub Project Group is aiming for then there will be a number of regular deliveries by mid range/large Dray vehicles. If there is no rear servicing then the existing poor service arrangements (See Fig 2.) will need to suffice which are likely to exacerbate the traffic problems in this area and lead to a continuation of the potential conflict problems with pedestrians and residents.



Fig 2. Existing Poor Service Access to the George Public House

Furthermore, the George is likely to serve a wider area than the Village. It is likely to attract customers from the surrounding area all of which are likely to access the facility by car and would need to park. The demographic information supplied by the Parish is also of relevance as it points towards a high percentage of elderly persons in the village with twice the national average between the age of 65 – 84 and a declining number of young people. Whilst many elderly will remain mobile some will be less so over the plan period and the provision of an adjacent car park will be an essential means of providing access to this facility. It is also an aim of the Draft Vision for the Neighborhood Plan to give particular consideration to the less able and vulnerable in the community and this is a practical step towards this aim.

Positioning the car park behind the George and making it available for general parking would create passing pedestrian traffic/customers walking to, and returning from the Town Square, once it is combined with the improvements to the High Street – The George to Revetts as identified by the Town Team.

Improvement to this area could also be combined with external highway improvements aimed at making the external seating to Andrew's café business safer and more attractive to customers.

Affect on the Allotments

It is acknowledged that the plots adjacent to the northern boundary will need to be relocated in order to accommodate the car park and new access road. There are many opportunities for this limited number to be relocated adjacent to the existing allotments. The allotments can therefore be extended to provide this.

As noted above in total the new development proposed in the plan will give rise to at least a 13% increase in the population of the village. The provision of allotments will also need to be increased in order to mitigate the impact of the development. Again, the Yew Tree Rise proposal is one of the few sites in the village that could achieve this.

There would be a further beneficial effect on the allotments as investment in improvements (e.g. hard standing areas, raised beds for the disabled etc) can be considered alongside any application for the residential dwellings.

Type of residential development proposed

The schedule of accommodation for the 50 dwellings proposed is as set out below;

Private					
House Type	Height (Storey)	No. of Bedrooms	Sqft	Amount	Total Sqft
Type A	2	2	775	5	3,875
Type C	2	3	1150	6	6,900
Type D	2	4	1250	5	6,250
Type E	2	4	1485	2	2,970
Type F	2	4	1645	15	24,675
Total				33	44,670
Affordable					
House Type	Height (Storey)	No. of Bedrooms	Sqft	Amount	Total Sqft
Type A	2	2	775	11	8,525
Type B	2	3	985	6	5,910
Total				17	14,435
Total				50	59,105
Total Housing Plot Areas (sqft)				59,105	

Fig 3. Schedule of Accommodation Proposed

The schedule provides for 35% of the number of dwellings proposed to be affordable in smaller homes (as requested by the employers in the village) of 2 and 3 bedroom dwellings. The precise mix of dwellings can be further refined by discussion however the above proposal is an initial proposal.

Conclusion

It is entirely recognised by my client that the Allotments are a much loved and valued community asset. It has never been my client's proposals to do anything other than improve upon this asset.

There will be an affect on the northern plots of the allotments in order to provide the access to the proposed development site and car parking however this will be compensated for by reinvesting and extending the allotments. There would therefore be a net gain for the allotments from the development. In any event, wherever the homes are provided there will need to be an expansion of the car parking and allotments to accommodate this 13% increase in population. The Yew Tree Rise site is the only site that can accommodate both of these facilities.

If an approach towards the allocation of sites is made on the basis of 'most benefit' rather than 'least impact' the case for developing from Yew Tree Rise is compelling. It will resolve the long standing highways difficulties identified by the Town Team, and will enhance the commercial viability and community offering of the George

The development from Yew Tree Rise will provide the opportunity to achieve long lasting safety improvements to the village as well as providing much needed homes.

Bruce Laws

I have lived in Wickham Market for the last 50 years and have seen the village develop and extend. I accept that development is necessary but am concerned that the infrastructure cannot cope with further development unless urgent steps are taken to impose some control.

Therefore, having carefully examined the Submission Copy of the Wickham Market Neighbourhood Plan I wish to register my support for the document. It seems to me to have been carefully researched and logically prepared.

I believe strongly that, as far as national planning policies permit, the represented views of the local community should be honoured, accepted and implemented.

In particular:

Section 5.12>: I agree that a prime need is to secure an effective and sustainable drainage system for the village. Without this we are just making problems for the (very near) future;

Section 5.21> : I fully agree that the Glebe Allotments, Playing Field, Beehive Field, church pightle, cemetery and Simon's Cross allotments should be protected from development;

Section 7.2>: I agree that current public parking provision is unsustainable. Something needs to be done!

Section 7.4>: I certainly endorse the expressed view that such residential development as is subsequently permitted must include adequate on-site car parking. Current parking in the village is insufficient and current planning policies for driving people onto public transport are not working. The result is increased parking on already restricted highways;

Section 7.14>: I fully endorse the list of proposed traffic etc improvements in this section;

Section 8: I fully endorse the proposed locations for the inevitable further housing development - i.e. Old School Farm and Simon's Cross;

Section 9.3>: I agree strongly that there is a great need for the creation of additional long-stay car parking. In my view this should be an ESSENTIAL provision (not just desirable)

I should be most grateful if you would:

1. Acknowledge receipt of this representation, and
2. INFORM me in due course of the outcome of the District Council's deliberations on this matter.

Colin Carter (Artisan PPS Ltd)

1. Introduction & Background

Introduction

- 1.1 Artisan is instructed by Mr Colin Carter to make representations to the Regulation 16 consultation for the Wickham Market Neighbourhood Plan (“**the WMNP**”). These representations relate to Land off Dallinghoo Road (south side) (“**the Site**” or “**site 7**”), as identified by the plan in **Appendix 1**¹ to this Statement.
- 1.2 To be clear, these representations take the form of **OBJECTIONS** made in respect of the following policies:
 - (a) WICK1
 - (b) WICK12
 - (c) WICK13
- 1.3 Moreover, representations in the form of **OBJECTIONS** are also made in respect of the following documents:
 - (a) Housing Needs Assessment (2017)
 - (b) Site Assessment Report (2018)
- 1.4 In order for the WMNP to proceed to a referendum, it must satisfy ‘Basic Conditions’ set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The basic conditions are:
 - (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
 - (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
 - (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
 - (d) the making of the order contributes to the achievement of sustainable development

¹ The site plan also show an indicative layout for residential development which is discussed later on in this document.

- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and
- (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

1.5 It is our client's view that the approach of the WMNP in relation to housing is fundamentally flawed, such that it cannot possibly satisfy the Basic Conditions. This is in relation to the assessment of housing need as well as the selection of sites forming the residential allocations in the current version of the WMNP. Accordingly, whether in addition to, or by replacement of, the proposed allocations, it is considered that the Site should be allocated for residential development under the WMNP.

1.6 Reference in this document to:

- (a) **"the Framework"** means the National Planning Policy Framework (2021)
- (b) **"the PPG"** means the Planning Practice Guidance (2014) (as amended)
- (c) **"the SCLP"** means the Suffolk Coastal Local Plan (Sept 2020)

2. **Assessment of Housing Need**

2.1 This section addresses the assessment of housing need as presented in the WMNP. In particular, the paragraphs below will consider the following policies and documents:

- (a) WICK1
- (b) Housing Needs Assessment dated July 2016, revised in March 2017 produced by AECOM (**"the HNA"**).

2.2 Before turning to the WMNP itself, it is important to consider the context in which the policies of the plan are drafted. Therefore, we turn first to the HNA.

Age of the HNA

2.3 The HNA forms part of the evidence base for the WMNP is more than five years old and uses evidence that is clearly out-of-date. Indeed, East Suffolk have an affordable housing SPD. This requires that all housing needs surveys are less than five years old. Whilst the SPD does not carry the same status as a development plan document, it

indicates the age of evidence that the District Council considers acceptable to meet the aims of its strategic housing policies. The HNA is more than five years old. Accordingly, the evidence underpinning the approach to housing in the WMNP is out-of-date and cannot be said to support the strategic aims of the SCLP.

2.4 In its section on neighbourhood planning, the PPG sets out at paragraph 41-040:

What evidence is needed to support a neighbourhood plan or Order?

While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.

[...]

Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.

In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making.

Paragraph: 040 Reference ID: 41-040-20160211

[Emphasis added.]

2.5 Therefore, the age of the document alone is sufficient to render it out-of-date and not robust as it does not consider the latest and up-to-date evidence of housing need. The table below shows the data used in the HNA compared with the data that is now available:

Data Used	Data Now Available
Ipswich Housing Market Area Strategic Housing Market Assessment Update (August 2012) ²	Ipswich Housing Market Area Strategic Housing Market Assessment Update (2018)
Suffolk Coastal District Local Plan: Core Strategy & Development Management Policies (Suffolk Coastal District Council, July 2013)	East Suffolk Council: Suffolk Coastal Local Plan (September 2020)
2012-based DCLG household projections	Household projections: <ul style="list-style-type: none"> • 2014-based³ • 2016-based • 2018-based Census 2021 (population data released on 28 June 2022)
Housing Register findings as at 9 th June 2016	More recent Housing Register data should be obtained given this is more than 6 years old

Calculation of Need

2.6 The HNA uses four different projections:

- (a) The first is derived from Suffolk Coastal Core Strategy up to 2027 and DCLG household projections 2027-2036. There are at least four problems with this.
 - (i) First, this clearly uses the figures from the strategic policies of the now withdrawn/superseded Core Strategy. This has not been updated to consider the SCLP, which was adopted two years ago.
 - (ii) Second, policy SP2 of the old Local Plan was consistently found to be out-of-date and not reflect the objectively assessed housing need for the area. It was found by a catalogue of Inspectors, the Secretary of State and indeed the Supreme Court⁴ to not be the correct figure for housing need in the area.

² It is important to note paragraph 46 of the HNA. This notes that the 2012 SHMA was in itself an update of the 2008 SHMA. The latter was based on the 2001 Census and housing need survey data from 2005-2008. Paragraph 46 of the HNA notes that the 2011 Census was not used and urges caution as a consequence.

³ Notwithstanding paragraph 88 of the HNA, it is considered that the 2014-based should now be used at the very least in order to be consistent with the calculation of district need in the standard method, which in turn underpins the SCLP strategic policy

⁴ *Suffolk Coastal District Council v Hopkins Homes Ltd and another* [2017] UKSC 37, [64].

- (iii) Third, the old Core Strategy and the newly adopted Local Plan overlap insofar as the plan period is concerned. The years 2018-2027 is covered by both plan period. However, the annual housing need identified in the more recent Local Plan significantly exceeds that in the old Core Strategy. Consequently, the HNA will have underestimated the level of need for the Neighbourhood Plan area.
 - (iv) Fourth, for the years beyond the now superseded Core Strategy, the HNA uses the 2012-based DCLG household projections. These are now significantly out-of-date. At the very least, the 2014-based figures should be used to be consistent with the most recently adopted SCLP, which used the Standard Method to assess its local housing need. However, it is considered that the more recent population projections should also be reviewed to assess whether this makes a material difference to the assessment of housing need. In summary, the first approach is based on a now withdrawn development plan document as well as out-of-date household projections.
- (b) The second approach uses only the 2012-based household projections. The comments about these projections set out above are repeated.
- (c) The third approach uses dwelling completion rates between 2001-2011. However, the report notes a few pages later: *“The number of dwellings in Wickham market grew by 12 units between 2001 and 2011 from 994 to 1,006. This equates to a 1.2% rate of dwelling growth which is a very low figure when in comparison to the district growth of 9.7%.”* This approach to calculating future housing need is based upon a “very low” growth over a ten-year period, which is all pre-NPPF. It is not therefore considered to be a robust starting point for an assessment of housing need today.
- (d) The final approach uses dwelling completion rates between 2011 and 2016, which is the date of the report (it is not clear whether this was amended in the 2017 revision). It is worthwhile remembering that during this period, the district council was plagued with a persistent lack of housing land supply as required by the NPPF. This would have constrained completion rates as fewer than required sites came forward. It is not clear what provision, if any, has been made for this in the calculation of need. More recent data is required to check whether the findings of some five years ago are still appropriate.

- 2.7 Whilst the HNA would have been appropriate when it was first published, it is clearly now out-of-date and it is no longer robust. It needs to be revised with a review of more recent data, as well as the most recently adopted development plan documents for East Suffolk.
- 2.8 Moreover, the HNA advises caution in using the DCLG projection need figure as it is 'unconstrained' and is 'driven by demand'. However, the standard method assesses the population change and applies an uplift based 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.

Dwelling Completions

- 2.9 Paragraph 149 of the HNA states:

Wickham Market has already seen 101 homes completed between 2011 and 2016. This leaves a residual demand range of 32 to 110 dwellings up to 2036.

- 2.10 Therefore, HNA deducts 101 dwellings from the calculation of need as they have been delivered. However, these dwellings were completed between 2011 and 2016. This does not relate to the period of time that the WMNP seeks to cover (2018-2036).
- 2.11 The strategic policies in the most recently adopted SCLP seek to address the needs of the wider district between 2018-2036. Therefore, the WMNP deducts dwelling completions from its assessment of need before the time that both the WMNP and the SCLP strategic policies seek to address.
- 2.12 It is considered to be inappropriate to deduct dwelling completions before the plan period from need within the plan period. It is possible that the housing need figure in the WMNP is unduly low as a result.
- 2.13 Moreover, given the age of the evidence, dwelling completions and housing delivery rates from the most recent five years have not been considered. It is therefore impossible to assess whether the approach in the HNA is still robust or whether it supports the strategic policies in the SCLP.

WICK1

- 2.14 In light of the above, the following sets out the specific **Objections** in respect of WMNP policy WICK1. An assessment of WICK1 against the Basic Conditions is set out in section 4

Paragraph A

- 2.15 Our client objects to the allocations referred to in this paragraph. More detail of these objections is set out in the following section.

Paragraph B

- 2.16 As discussed above, the calculation of 110 dwellings is not robust, it is based upon wildly out-of-date data, relies upon the now withdrawn Suffolk Coastal Core Strategy, it deducts completed dwellings from outside the plan period, it fails to consider more recent data and it fails to consider more recent strategic and national planning policy. It clearly, does not meet the requirements of the PPG.

Paragraph C

- 2.17 This merely requires compliance with the SCLP and is therefore superfluous as the SCLP is already part of the development plan for planning applications in the Wickham Market area.

Paragraph D

- 2.18 The first bullet point will require development to address “evidence-based needs as set out in the Wickham Market Housing Needs Assessment.” In light of the above discussion as to the robustness of that evidence now in 2022/23, this requirement is plainly inappropriate.

3. Housing Site Selection

- 3.1 This section considers the site selection process and the evidence underpinning that exercise resulting in the two allocations in WICK12 and WICK13.

Site Assessment Report (February 2018)

- 3.2 The Site Assessment Report (“**the SAR**”) was prepared by AECOM and is dated February 2018. Just like the HNA discussed in the previous section, the SAR is also out-of-date and has been overtaken by events. Consequently, it also omits highly relevant information that was published after the SAR. It can no longer be considered a robust in accordance with the PPG.⁵

⁵ Paragraph 41-040 – see paragraph 2.4 of this document.

- 3.3 In December 2018, East Suffolk Council published its Strategic Housing and Economic Land Availability Assessment (“**the SHELAA**”). Indeed, the entire approach set out in the SAR is underpinned by the old Suffolk Coastal District Council SHLAA dated 2014. The SAR therefore needs to be reviewed to take account of this more recent information.
- 3.4 The SAR also predates the updated Neighbourhood Planning Toolkit in 2021. The SAR is instead based upon the 2015 toolkit, which was specifically updated to respond to changes in the Framework and the PPG.
- 3.5 Moreover, the SAR was prepared prior to the proposed designation and allocation of various protective policies under the WMNP. Therefore, when the sites were assessed the SAR did not take these various constraints into account. Some of these are considered below in the context of WICK12 and WICK13.
- 3.6 Insofar as the SAR assesses the potential land for allocation, only two completed Site Appraisal Pro-Forms are supplied. These are for the two sites which go on to form the proposed allocations under WICK12 and WICK13. Whilst specific comments are made in respect of these proposed allocations, it is considered that the evidence base is substantially incomplete without a similar assessment of all the sites to support the conclusion that only WICK12 and WICK13 are suitable for allocation.
- 3.7 Consequently, the evidence supporting the review of all the potential sites and underpinning the site selection process is plainly not robust.

WICK12

- 3.8 There are significant issues with this proposed allocation, such that our client **Strongly Objects** to its inclusion in the WMNP. These issues relate to the following:
- (a) Impact on heritage assets
 - (b) Impact on Key View(s)
 - (c) Potential title issues impacting deliverability/availability
 - (d) Potential issue relating to a gas pipeline
 - (e) SHELAA Assessment
- 3.9 Each of these will be considered in turn.

Heritage Impact

- 3.10 One of the consequences of the SAR predating the draft policies in the WMNP is that the assessment of sites fails to take account of new protective policies and designations that emerge with the WMNP. This is the case in respect of heritage issues.
- 3.11 Whilst nationally protected buildings and land will have been known at the time the SAR was prepared, the proposed listing of non-designated heritage assets (“**NDHA**”) would not have been clear at the time. This explains why the Pro-Forma for this site attached in Appendix A to the SAR records that: “*There are no heritage assets within or adjacent to the site.*” With the proposed listing of The Old School⁶ and the Parish Cemetery and Bier House,⁷ the assessment in the SAR is clearly now wrong and requires reassessment.
- 3.12 Indeed, proposed policy WICK8 requires that there should not be substantial harm to the physical structure or the setting of the NDHAs without clear and convincing justification in a heritage statement. We have seen no such clear and convincing justification.
- 3.13 Accordingly, there are significant heritage considerations with this proposed allocation that have not been taken into account. This alone should justify the deletion of this proposed allocation on the basis that its selection appears to be unsupported by robust evidence and it appears to be contrary to other policies in the WMNP, namely WICK8.

Key View(s)

- 3.14 Just as the SAR failed to take into account heritage considerations in the site assessment process, it also failed to consider the proposed allocation of various key views in the plan area.
- 3.15 In the case of WICK12, there are two if not three Key Views impacting the site. Proposed policy WICK3 requires that development protects, if not enhances, these key views. Clearly the development of this site will neither protect nor enhance any of the key views proposed under the WMNP.
- 3.16 Key view 12 is across an open arable field towards the landmark church spire as set out on page 10 of the key views assessment. The development of this site will

⁶ Listed at number 6 in the list of NDHAs in the WMNP.

⁷ Listed at number 16 in the list of NDHAs in the WMNP.

obscure almost entirely the existing view of the landmark church. The existing glimpses of houses of Wickham market will be replaced with residential development much closer 2 walnuts lane. Accordingly, the quality of key view 12 will be substantially undermined and eroded by the allocation of WICK12 for development.

- 3.17 Key view 11 is a long-distance Open View across arable fields towards Pettistree Church, with the boundaries of the cemetery also visible. The development of this site will also obscure this key view to a significant degree. The quality of key view 11 is, therefore, also under threat from this proposed allocation off site WICK12.
- 3.18 Given the order of events, it does not appear that the SAR took into consideration these protected views when it assessed the suitability of all the prospective sites when conducting its appraisal. This further justifies the deletion of allocation WICK12 on the basis that it is not supported by robust evidence and it appears to conflict with proposed policy WICK3.

Title Issues

- 3.19 An inspection of the title register for land including WICK12 reveals that there are potential restrictive covenants that might prohibit this site ever coming forward. Whilst the accompanying title plan was not available online, the list of covenants on the register indicate that day is a restriction prohibiting direction of any building on the land and further that the land must only be used for the purpose of agriculture.
- 3.20 As noted above, we were not able to obtain a title plan and so some caution must be taken in the assessment of these restrictive covenants, it is considered that they are potentially fatal to the success or otherwise of this allocation. Therefore, further evidence is needed to demonstrate that there are No title issues and that the restrictive covenant entries do not apply to the allocated land.

Gas Pipeline

- 3.21 The title register also makes reference to an easement for a main gas pipeline. evidence is needed to demonstrate that they proposed allocation and residential development of this land will not cause any issues in respect to this pipeline, if indeed it runs across the proposed allocated land.
- 3.22 In the event that the gas pipeline does run across this land, then the impact on the number of dwellings start might be deliverable on this site needs to be assessed.

SHELAA Assessment

- 3.23 This site was submitted and considered as part of the East Suffolk SHELAA, with reference 499 (see the map produced at **Appendix 2**). The assessment of this site under the SHELAA is provided at **Appendix 3**. In summary, they were identified issues in respect of access, landscape and townscape, biodiversity, the historic environment, transport and roads and the compatibility with neighbouring uses. All of these were assessed as having an 'amber' impact.
- 3.24 Specific comments were made in respect of each of the amber-scoring criteria. These include the potential for impact on the Wickham Market conservation area, impact on the Pettistree conservation area call mom impact upon the cemetery, the site being identified as having potential archaeological value and given the trees and hedges around the site, it is considered to be of biodiversity interest.
- 3.25 It is unfortunate that the SAR was not updated following the publication of the East Suffolk SHELAA. Had it been updated, it would have been able to respond to the identified potential issues raised and there would have been some justification for the continued allocation of this site. In the absence of such evidence or justification, the inclusion of this site as a proposed residential allocation is clearly not robust.

WICK13

- 3.26 Our client **Objects** to the allocation of this site on the basis of the following issues:
- (a) Heritage impact
 - (b) SHELAA Assessment

Heritage Impact

- 3.27 This largely reflects the consideration of heritage impacts above in respect of site WICK12 and most of the comments therein also apply here.
- 3.28 The appendix to the SAR containing the pro forma for this site also considered that there were no heritage assets within or adjacent to the site. However, the now proposed listing of the Pill Box on the northwest corner of the proposed allocation⁸ was clearly not taken into account during the assessment or suitability for development.
- 3.29 There appears to be the same absence of robust evidence supporting the continued allocation of this site as well as the apparent conflict with proposed policy WICK8

⁸ Listed at number 5 in the list of NDHAs in the WMNP.

through the significant adverse change within the setting off the heritage asset. There is no clear and convincing justification set out for this proposed allocation.

SHELAA Assessment

- 3.30 This site was also considered as site 1114 under the SHELAA. The SHELAA assessment of the site is produced at **Appendix 4**. There are amber scores against the access to the site, utility's, landscaping townscape, biodiversity, open space and transport and roads.
- 3.31 Whilst the historic environment criterion scored green in this assessment, in light of the proposed designation of the adjacent Pill Box as an NDHA, this will need to be reassessed.

4. The Site

- 4.1 This section sets out details about the Site, reviews the assessment of the Site during the Preparation of the WMNP and then sets out the case in favour of its allocation for residential development.

Site Description

- 4.2 The Site is located outside but immediately adjacent to the settlement boundary of Wickham Market. There is good definition to the site frontage boundary in the form of Dallinghoo Road where the speed restriction is 30mph and which is capable of improvement to form an appropriate standard of vehicular access to serve the proposed residential allocation of approx. 46 dwellings.
- 4.3 The WMNP evidence base comprising the Part One Landscape Character Assessment of April 2018, in review of the key characteristics of the area which it names 'Thong Hall Plateau Edge', notes that (in respect of the area forming part of the mission site representation that, whilst the boundaries of the village in this location are clearly defined and well vegetated, the edge is less successful and more stark further north at 'The Crescent' (page 18). there is thus the evident opportunity to bring about significant change and landscape improvement to this part of the settlement concomitant with the landscaping requirements for the proposed development. Such landscaping measures would also enhance significantly local biodiversity.
- 4.4 The site forms part of an existing field, a single tract of actively farmed arable agricultural land without intervening hedge boundaries, trees or any other natural feature. It is approximately level.

- 4.5 On the SHELAA map (**Appendix 2**), the site the subject of this representation, is a slightly modified and extended reference 7, also taking in part of reference 816, done to achieve a better presentation of new boundaries with landscaped belts to the western and southern edge to achieve a better 'rounding off' of development in this part of the settlement.
- 4.6 However, also worthy of note is that there is existing residential development on the frontage to Dallinghoo Road opposite the omission site and in depth behind that frontage as well as in the adjacent Crescent. Thus, the new landscaping belts brought about by the proposed development of the omission site, would not only 'contain' the omission site in visual/landscape terms, but it would also improve on the present position of the area between this part of the village edge and the surrounding countryside and would read as part of the existing skyline of the village.
- 4.7 The land here is Grade 3 agricultural land and no protective landscape designations apply. It is also notable that the landscape assessment referred to in paragraph 1.2 above, does not record any important views into or out of this part of the village which require protection.
- 4.8 On its western and southern boundaries new landscaping belts would be introduced to mitigate any landscape impact but primarily to enhance biodiversity.
- 4.9 It is notable that the ESC settlement fringe sensitivity assessment 2018 (Vol 2), a report produced for the Council as part of the evidence base for the adopted ESC Local Plan 2020, did not consider that Wickham Market should feature as one of the key identified settlements of the wider former Suffolk Coastal district that required this priority study.

Assessment under the SAR

- 4.10 As noted in the previous section, the SAR does not produce the proforma assessment of all the sites under consideration for allocation under the WMNP. It is not therefore possible to review all of the evidence base in relation to the assessment of site 7. Table 5-1 of the SAR assesses the site under reference 4b and it receives a red rating, which means that it is not appropriate for allocation in the neighbourhood plan.
- 4.11 The assessment findings indicate that the reason the site was assessed as unsuitable stems from the SHLAA in 2014. That document has been superseded by the 2018 SHELAA and so the approach to this site in the SAR is out of date and needs to be

reviewed. In other words, the evidence rejecting this site for allocation in the WMNP is not robust as required by the PPG.

- 4.12 The specific comments listed in table 5-1 state that the development of this site will *“likely lead to additional traffic at the pinch point on Dallinghoo Road between the Market Square and school.”* It is also said that there is no safe direct pedestrian route between the site and the village centre (no footpath).
- 4.13 In respect of the alleged traffic problem, it is surprising that there is no highway assessment that would evidence an existing problem in respect of the capacity at this pinch point. Therefore, the rejection of this site for this reason is unjustified and without any evidence.
- 4.14 Moreover, any development on this site is more than capable of providing a footway thereby addressing the only other negative comment in the assessment under the SAR.
- 4.15 Overall, it is considered that the assessment of this site is fundamentally flawed, unsupported by any evidence and flows from an out of date SHLAA. The assessment of the site is far from robust and it is clearly not justified.

The Case for Site 7

- 4.16 In stark contrast to the two proposed housing allocations, site 7 does not have the same constraints and will not result in the immediate conflict with the proposed protective policies in the WMNP.
- 4.17 For example, site 7 does not have any NDHAs adjacent to it whereas both the proposed allocations do. The development of site seven will not therefore have any adverse impact upon the setting of any heritage assets. The same cannot be said for sites WICK12 and WICK13.
- 4.18 There are also no key views across site 7, let alone a key view that will be adversely affected by the residential development of the site. The same cannot be said for WICK12.
- 4.19 Site 7 is available now, it is clearly suitable for development and should therefore be an allocation under the WMNP. Our client **Objects** to the omission of site 7 as a housing allocation.

- 4.20 At **Appendix 1** is an indicative site layout demonstrating that site 7 is capable of delivering 46 dwellings. It illustrates a development of 46 dwellings arranged around a central amenity feature comprising public open space. The housing benefit, in quantitative and qualitative terms is evident given that there are a mix of dwelling types proposed, entirely in accordance with identified need.
- 4.21 Of the 46 dwellings, 16no. would comprise affordable dwellings of which 7no. would be single storey. Of the 16no. affordable dwellings, 10no. would be either one or two bedrooms which are the categories at the highest level of identified dwelling type need.
- 4.22 Of the 30no. market dwellings in the indicative layout, 20no. would be single storey bungalows. There are shown 7 no. three bed houses whilst there are only 3no. four bed houses. 20no. dwellings (all bungalows) would be two-bedroom thus achieving a healthy housing mix and cross section of property types as well as the specific address of certain sections of the community (older age groups). In qualitative terms, the development could deliver a very healthy addition to the housing stock in the village and to the wider district.
- 4.23 The proposed allocation of site 7 represents a logical extension to the built form and 'rounds off' the settlement in this respect.
- 4.24 The SHELAA only recorded 4 amber ratings in the assessment of this site, with every other criterion receiving a green rating. The SHELAA assessment for this site is produced at **Appendix 5**. The suitability conclusion states: *"Potentially suitable. Issues to be addressed include vehicle access, highways and surface water flooding."*
- 4.25 The provision of a foot way can form part of any development of this site and therefore addresses this perceived issue of accessibility. In terms of any perceived highways impacts, there is no evidence that there is a material issue in this respect that would prevent this site coming forward for development. In any event, any allocation of this site can be subject to a highways assessment confirming that there will be no severe impact on the local highway network.
- 4.26 In terms of any perceived surface water problem, this can and will be addressed through the provision of a suitable drainage solution and therefore addresses this concern in its entirety.
- 4.27 In respect of the amber rating under the Utilities criterion, this relates to Water Recycling Centre capacity issues. However, this is not unique to site 7 and also

applies to both WICK12 and WICK13. Therefore, this does not justify the omission of this site for this reason. In any event, given the contiguous land ownership of land outside the omission site, it is perfectly possible to devise a mini treatment works capable of dealing with the water recycling needs of development generated by site 7.

Conclusion

- 4.28 In summary, the assessment of site seven in the preparation of the WMNP is far from robust and the evidence base is out of date and incomplete. The above analysis demonstrates that this site is much more suitable for development than both WICK12 and WICK13, which each have technical issues unlike site 7.
- 4.29 Accordingly, site 7 should be allocated for residential development under the WMNP, either in addition to or the replacement of WICK12 and WICK13.

5. Assessment of Basic Conditions

- 5.1 Further to the foregoing sections of this representation, the following paragraphs will briefly consider each of the policies objected to against the Basic Conditions, as well as the WMNP overall.

WICK1

- 5.2 In light of the identified deficiencies in the now out of date HNA, there are serious concerns as to whether this policy satisfies Basic Condition (a), (d) and (e).
- 5.3 It has been demonstrated that the HNA is not consistent with the advice contained within the PPG and that it was prepared based on documents which predate the current NPPF. The age of the document alone is sufficient to render the approach to housing need inconsistent with the NPPF and the PPG. WICK1 will not therefore satisfy Basic Condition (a).
- 5.4 The issues with the assessment of need mean that it is impossible to confirm that the housing needs of the parish will be met. It cannot be said therefore that WICK1 contributes to the achievement of sustainable development. Basic Condition (d) will not be satisfied.
- 5.5 Moreover, given the approach to need is in part based on the old and withdrawn Suffolk Coastal Core Strategy, it is not clear whether there is general conformity with the strategic policies in the development plan. WICK1 does not therefore satisfy Basic Condition (e).

WICK12

- 5.6 There is significant concern that this policy does not satisfy the Basic Conditions (a), (c) and (d).
- 5.7 The development of this site will lead to environmental impacts through the loss of key views, potential impact upon two conservation areas and impact upon the setting of non-designated heritage assets.
- 5.8 The selection of this site for allocation is fundamentally flawed and it cannot be said, therefore, that it will contribute to the achievement of sustainable development.
- 5.9 For these reasons, this policy does not satisfy Basic Conditions (a), (c) and (d).

WICK13

- 5.10 The development of this site will lead to impact upon the setting of a non-designated heritage asset. There is no justification for this impact. This policy therefore fails to satisfy Basic Conditions (a) and (d).

The WMNP Overall

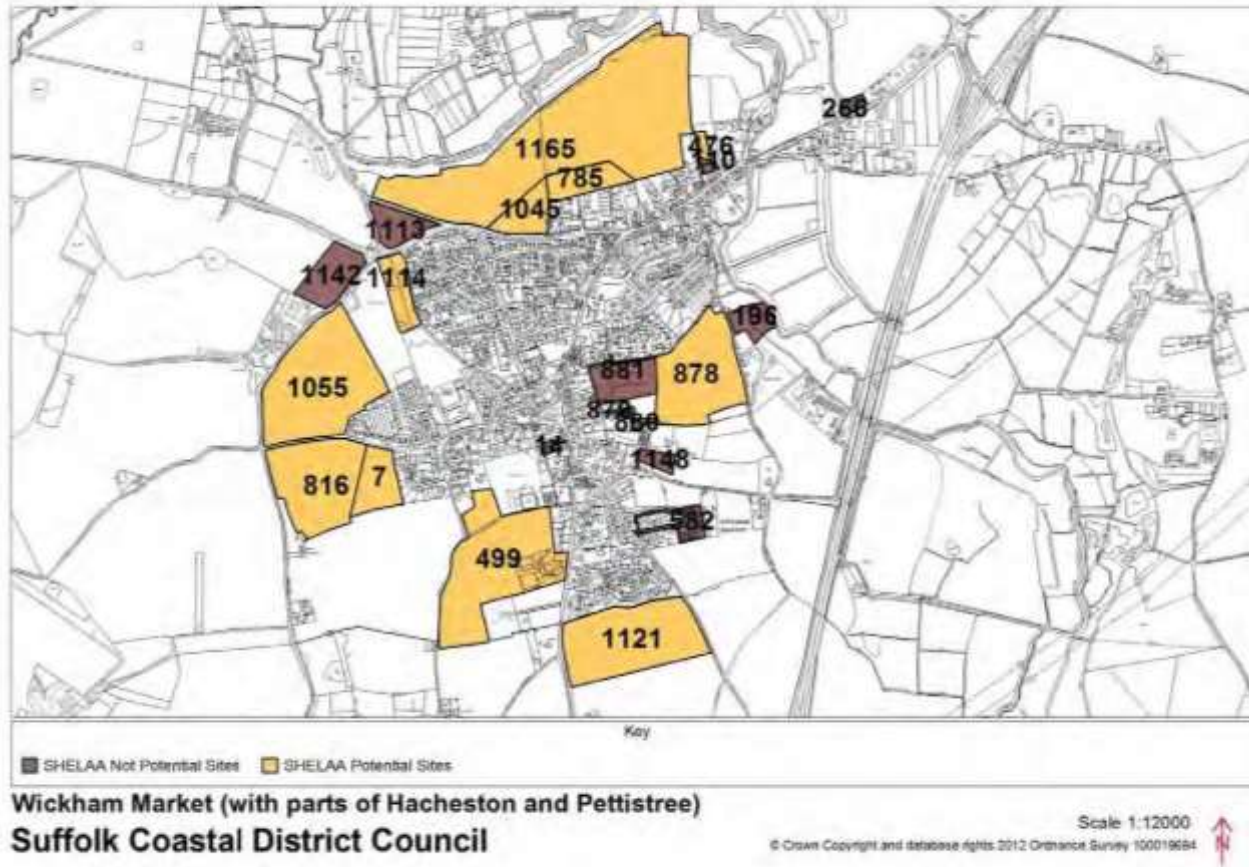
- 5.11 For the reasons set out above, it is considered that the WMNP does not meet the Basic Conditions in its current form. The WMNP certainly does not meet the test set out in the PPG that the evidence supporting must be robust, especially when it comes to housing. This alone indicates a failure to satisfy Basic Condition (a).

Appendix 1 - Site Plan & Indicative Site Layout



Appendix 2 - SHELAA 2018 Map

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment
Map Book (December 2018)



Appendix 3 - SHELAA – Site 499

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Site Details

Parish / Town	Wickham Market
Site reference	499 Land West of Old School Farm, High Street, Wickham Market
Site Area (hectares)	7.91
Proposed use	Housing
Existing land use	Agriculture and buildings
Neighbouring land uses	Site adjoins Pettistree conservation area that contains a number of Listed Buildings.

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Existing vehicle access in place serving employment / commercial uses within the south east of the site.
Utilities capacity	Amber	The Water Cycle Study identifies potential Water Recycling Centre capacity issues.
Utilities Infrastructure	Green	No issues to address.
Contamination	Green	No issues to address.
Flood Risk	Green	No issues to address.
Coastal Change Risk	Green	No issues to address.
Market Attractiveness	Green	No issues to address.
Landscape and Townscape	Amber	The site adjoins a conservation area and cemetery. A treelined footpath cuts across the site. Other trees within the site and to site boundaries.
Biodiversity	Amber	Trees, hedgerows, shrubs and overgrown grassed areas within the site are likely to be of biodiversity interest.
Historic Environment	Amber	Site adjoins Pettistree conservation area that contains a number of Listed Buildings. The site also adjoins a cemetery. SCC Archaeological Survey has identified the site as of potential archaeological value.
Open Space	Green	The site adjoins a cemetery.
Transport and Roads	Amber	Cumulative highways impacts to local roads. Footway widening required along frontage plus potential improvements to Walnuts lane towards school.
Compatibility with neighbouring uses	Amber	Site adjoins Pettistree conservation area that contains a number of Listed Buildings.
Contribution to regeneration	Green	The site contains existing employment / commercial units that are occupied.

Suitability conclusion	Potentially suitable. Issues to be addressed include; access, landscape / townscape, biodiversity, historic environment, highways impacts and compatibility with neighbouring uses.
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Availability

Is the site available?	Yes
Evidence of availability /	Landowner / developer

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

comments

Achievability

Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

Estimated dwellings yield	119
Estimated employment land yield (hectares)	-
Estimated retail floorspace (sqm)	-
Estimated commencement date	2020/21

Appendix 4 - SHELAA – Site 1114

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Site Details

Parish / Town	Wickham Market
Site reference	1114 Simons Cross Allotments, Wickham Market
Site Area (hectares)	1.26
Proposed use	Housing
Existing land use	Allotments
Neighbouring land uses	Residential to east. Vacant land to the north, west, and south.

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Access only appears feasible via Simon's Cross.
Utilities capacity	Amber	The Water Cycle Study identifies potential Water Recycling Centre capacity issues.
Utilities Infrastructure	Green	No issues identified.
Contamination	Green	No issues identified.
Flood Risk	Green	No issues identified.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Amber	A public footpath runs across the site, from East to West, and along the Western border. A bridleway borders the site to the east.
Biodiversity	Amber	Trees and hedges border the site on all sides.
Historic Environment	Green	No issues identified.
Open Space	Amber	Development would result in a loss of allotments. Provision for local residents should be provided elsewhere if possible.
Transport and Roads	Amber	Potentially no footway provision.
Compatibility with neighbouring uses	Green	No issues identified.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion	Potentially suitable. Issues to be addressed include; replacement of allotments if needed, access, landscape, biodiversity value, and open space.
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Availability

Is the site available?	Yes
Evidence of availability / comments	Landowner submission

Achievability

Is the site achievable?	Yes
Evidence of achievability	Assumed - replacement of allotments may be needed
Are there any commencement issues?	Replacement of allotments

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Estimated dwellings yield	19
Estimated employment land yield (hectares)	-
Estimated retail floorspace (sqm)	-
Estimated commencement date	2024/25

Appendix 5 - SHELAA – Site 7

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Site Details

Parish / Town	Wickham Market
Site reference	7 Land adj to 14 and 16 The Crescent, Dallinghoo Road
Site Area (hectares)	1.69
Proposed use	Housing
Existing land use	Agriculture
Neighbouring land uses	Residential to the east and north, agricultural to the south and west

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Potential vehicle and pedestrian access from Dallinghoo Road at the north of the site. No footways access to the site.
Utilities capacity	Amber	The Water Cycle Study identifies potential Water Recycling Centre capacity issues.
Utilities Infrastructure	Green	No issues identified.
Contamination	Green	No issues identified.
Flood Risk	Amber	Flood Zone1. Surface water flooding on the site.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Green	The site is used for crop production. Hedgerows to site and field boundaries. Adjacent established housing estate area to the east.
Biodiversity	Green	No records of protected BAP species on the site. The site is used for crop production. Hedgerows to site and field boundaries.
Historic Environment	Green	No issues identified.
Open Space	Green	No issues identified.
Transport and Roads	Amber	Cumulative highways impacts on Dallinghoo Road around the school in proximity to the site. No footways access to the site.
Compatibility with neighbouring uses	Green	Adjacent established housing estate area to the east.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion	Potentially suitable. Issues to be addressed include vehicle access, highways and surface water flooding.
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Availability

Is the site available?	Yes
Evidence of availability / comments	Landowner response

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Achievability

Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

Estimated dwellings yield	25
Estimated employment land yield (hectares)	-
Estimated retail floorspace (sqm)	-
Estimated commencement date	2021/22

Appendix 6 - Summary of Title - SK180282 (2022-12-20)

**GOV.UK**

Search for land and property information

Title register for:**Land Associated With, 41 High Street, Wickham Market, Woodbridge,
IP13 0HE (Freehold)****Title number: SK180282**

Accessed on 20 December 2022 at 17:27:20

This information can change if we receive an application. This service can not tell you if HM Land Registry are dealing with an application.

**This is not an official copy. It does not take into account if there's a pending application with HM Land Registry. If you need to prove property ownership, for example, for a court case, you'll need to order an official copy of the register.****Register summary****Title number** SK180282**Registered owners**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Value stated

[REDACTED] on 29 October 2021

This value covers more than just the land in this title

A: Property Register

This register describes the land and estates comprised in this title.

Entry number	Entry date	
1		<p>SUFFOLK : EAST SUFFOLK</p> <p>The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being land associated with 41 High Street, Wickham Market, Woodbridge (IP13 0HE).</p>
2	1998-04-09	<p>The mines and minerals are excepted from the land edged and numbered 1, 2 and 3 in blue on the title plan.</p>
3	1998-04-09	<p>The land has the benefit of the following rights reserved by a Conveyance of adjoining land dated 3 January 1991 made between (1) [REDACTED] [REDACTED] (Vendors) and (2) [REDACTED] [REDACTED] (Purchasers):-</p> <p>"EXCEPT AND RESERVING unto the Vendors and their successors in title for the benefit of their adjoining land (as the same is shown edged blue on the plan annexed hereto) and each and every part thereof a right to enter that part of the property hereby conveyed as is shown coloured green on the said plan as the same extends to a depth of Thirty feet (30 ft) from Mill Lane (hereinafter called the green land) to enter upon the same with or without machinery and workmen for the purpose of laying drains pipes wires and cables under the green land TOGETHER WITH the right for the passage of water soil and electricity through the same TOGETHER ALSO with the right to enter upon the green land to maintain and repair the drains pipes wires and cables the person exercising such right forthwith making good any damage so caused"</p>

NOTE: Copy Conveyance plan filed.

4	2001-06-28	The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.
5	2009-03-25	The land has the benefit of the rights granted by a Deed dated 17 December 2008 made between (1) [REDACTED] and (2) [REDACTED]. NOTE: Copy filed.
6	2018-07-25	A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.
7	2021-12-15	The land has the benefit of any legal easements reserved by a Transfer of the land edged and numbered SK412469 in green on the title plan dated 26 November 2021 made between (1) [REDACTED] and (2) [REDACTED] but is subject to any rights that are granted by the said deed and affect the registered land. NOTE: Copy filed under SK412469.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Class of Title: Title absolute

Entry number **Entry date**

1	2021-08-11	PROPRIETOR: [REDACTED] [REDACTED] [REDACTED] [REDACTED]
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2	1998-04-09	RESTRICTION: No disposition by a sole proprietor of the land (not being a trust corporation) under which capital money arises is to be registered except under an order of the registrar or of the Court.
3	2021-08-11	The value stated as at 29 October 2021 for the land in this title and in SK182519, SK182537, SK182540 and SK182541 was [REDACTED].

C: Charges Register

This register contains any charges and other matters that affect the land.

Class of Title: Title absolute

Entry number	Entry date	
1	1998-04-09	<p>Such part of the land edged and numbered 1, 2 and 3 in blue on the title plan as is affected is subject to a perpetual annual rent charge of £5 mentioned in a Deed dated 11 October 1912.</p> <p>NOTE 1: A Transfer dated 24 March 1932 from The East Suffolk County Council (the Council) to [REDACTED] (the Purchaser) of the land in this title and other land contained a covenant by the Purchaser with the Council that the said perpetual annual rent charge of £5 should thenceforth be charged on and issue out of the land thereby transferred to the exoneration of such other land (if any) belonging to the Council that the said Transfer contained an indemnity by the Purchaser for the payment of the said rent charge and for costs charges and claims incidental thereto</p> <p>NOTE 2: Copy filed under 15089.</p>
2	1998-04-09	A Conveyance of the land edged and numbered 4 in blue on the title plan dated 14 September 1950

		<p>made between (1) The Rural District Council of Deben (Council) and (2) [REDACTED] (Purchaser) contains the following covenants:-</p> <p>"The Purchaser hereby covenants with the Council (i) that he will forthwith erect and at all times hereafter maintain a good and sufficient boundary fence to the satisfaction of the Council between the land hereby conveyed and the adjoining property of the Council (ii) that the said land hereby conveyed shall not be used for any other purpose than agriculture and (iii) that any building or buildings shall not be erected on the said land or any part thereof without the written consent of the Council first had and obtained"</p>
3	1998-04-09	<p>The parts of the land affected thereby are subject to the following rights granted by a Deed dated 4 February 1955 made between (1) [REDACTED] (Grantor) (2) [REDACTED] (Bank) and (3) [REDACTED] :-</p> <p>"the Grantor with the consent of the Bank (receipt whereof the Grantor hereby acknowledges) the Grantor as BENEFICIAL OWNER HEREBY GRANTS and the Bank as Mortgagee hereby releases unto the Board and its assigns in fee simple the easements privileges rights and liberties specified in the First Schedule hereto in over and upon the said land</p> <p>THE Board hereby covenants with the Grantor and successors in title that the Board in exercising its said easements privileges rights and liberties will do as little damage as possible to the surface of the said land and the crops for the time being growing thereon and will pay to the Grantor and his successors in title compensation for all damage so done as aforesaid the amount of such compensation to be determined in default of agreement by arbitration pursuant to the provisions</p>

of the Arbitration Act 1950

THE FIRST SCHEDULE above referred to

The easement privilege right and liberty of laying and maintaining mains and pipes for carrying gas of a size hereinafter mentioned in and under the land coloured red on the said plan at a depth of not less than two feet in the position indicated by a broken line in the said plan between the points marked A and B C and D E and F G and H I and J and K and L and of inspecting maintaining repairing and renewing such mains and pipes and of obtaining access to the same for any of the purposes aforesaid over and along a track five feet wide above the site of such mains and pipes so indicated by the said broken line

Size of Main yards	Length of Main
8"	A - B 110
C - D 580	
E - F 470	
G - H 87	
I - J 193	
K - L 400	

1,840"

The said Deed also contains the following covenants by the Grantor:

"THE Grantor hereby covenants with the Board to the intent and so as to bind the said land that no building shall be erected over the mains and pipes specified in the First Schedule hereto without the consent of the Board"

NOTE: The land coloured red and the broken line are shown tinted pink and by a blue broken line respectively on the title plan.

4	1998-04-09	<p>An Agreement and Undertaking dated 15 June 1964 made between (1) [REDACTED] and (2) [REDACTED] affecting the land edged and numbered 1 in blue on the filed plan relates to improvements to the London Great Yarmouth Trunk Road.</p> <p>NOTE: Copy filed under P103284(SK)</p>
5	1998-04-09	<p>The land is subject to the rights granted by a Deed dated 2 October 1973 made between (1) [REDACTED] (2) [REDACTED] and (2) The [REDACTED]</p> <p>The said Deed also contains restrictive covenants by the grantor.</p> <p>NOTE: Copy filed.</p>
6	1998-04-09	<p>The land is subject to the rights granted by a Deed dated 14 May 1992 made between (1) [REDACTED] (2) [REDACTED] and (3) [REDACTED].</p> <p>NOTE: Copy filed.</p>
7	2013-12-16	<p>The land is subject to the rights granted by a Transfer of the land edged and numbered SK350470 in green on the title plan dated 5 December 2013 made between (1) [REDACTED] (Transferors) and (2) [REDACTED] (Transferee).</p> <p>NOTE: Copy filed under SK350470.</p>

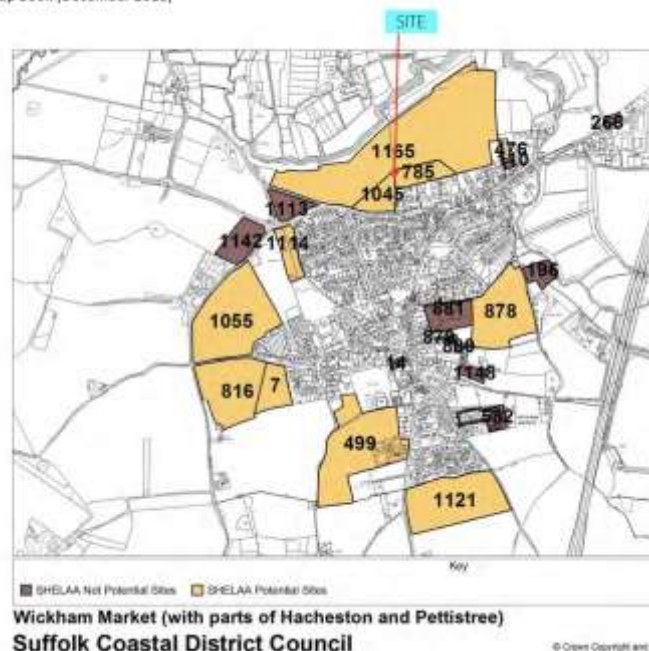
Colin Carter (Artisan PPS Ltd)

1. Introduction & Background

Introduction

- 1.1 Artisan is instructed by Mr Colin Carter to make representations to the Regulation 16 consultation for the Wickham Market Neighbourhood Plan (**“the WMNP”**).
- 1.2 The essence of the objection is that the proposed residential allocations in the WMNP are inappropriate and are based on a selection procedure which has not been carried out correctly using the latest available evidence thereby leading to a flawed assessment and conclusion.
- 1.3 In addition, the plan fails to make appropriate provision for employment land commensurate with the proposed housing growth for the village. There are better, more appropriate sites adjacent the village which perform significantly better using the same selection criteria as informed the WMNP.
- 1.4 In respect of the “better, more appropriate sites”, these relate to land known as, ‘Land to the north of Border Cot Lane Industrial Estate and land adjacent the BT telephone exchange, (**“the Site”**). They are available either individually or in combination. These parcels of land are identified on the SHELAA map extract inset below and numbered 785 and 1045 respectively.

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment
Map Book (December 2018)



1.5 To be clear, these representations take the form of **OBJECTIONS** made in respect of the following policies (and the relevant supporting text where identified elsewhere in these Representations):

- (a) WICK1
- (b) WICK12
- (c) WICK13

1.6 Moreover, representations in the form of **OBJECTIONS** are also made in respect of the following documents:

- (a) Housing Needs Assessment (2017)
- (b) Site Assessment Report (2018)

1.7 In order for the WMNP to proceed to a referendum, it must satisfy 'Basic Conditions' set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The basic conditions are:

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- (d) the making of the order contributes to the achievement of sustainable development
- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and
- (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

1.8 It is our client's view that the approach of the WMNP in relation to employment land is flawed in that it fails to provide for employment opportunities in the absence of any allocations for new employment land in one of the major rural settlements identified in the East Suffolk district for growth.

- 1.9 It is also our client's view that the approach of the WMNP in relation to housing is also fundamentally flawed, such that it cannot possibly satisfy the Basic Conditions. This is in relation to the assessment of housing need as well as the selection of sites forming the residential allocations in the current version of the WMNP. Accordingly, whether in addition to, or by replacement of, the proposed allocations, it is considered that the Site should be allocated for residential development under the WMNP.
- 1.10 Reference in this document to "**the Framework**" means the National Planning Policy Framework (2019). Reference to "**the PPG**" means the Planning Practice Guidance (2014) (as amended). Reference to the **ESCLP** is to the East Suffolk Local Plan adopted in September 2020.
- 1.11 These representations relate to the '**site**' as is identified by the plan on page 2 of this Statement which is extracted from the former Suffolk Coastal District Council's strategic housing and economic land availability assessment of December 2018 (SHELAA) where it is referred to by two index numbers, 785 and 1045. The site specific assessments of these two contiguous parcels which are in fact parts of the same single agricultural field, is set out in **Appendix 1** to this Statement.

Site description (Omission Site)

- 1.12 The Site is located outside but immediately adjacent to the settlement boundary of Wickham Market. There is good definition to the site boundary and an effective landscape screen to the village formed by the frontage hedge on to Border Cot Lane (B1078). In that frontage hedge there is an existing farm track/access just inside the 30mph limit which is capable of improvement to form an appropriate standard of vehicular access to serve both an extended employment site and the adjacent proposed residential allocation of approx 25 dwellings.



Farm access track on to proposed residential/employment allocation (Google Earth)

- 1.13 The site forms part of an existing field, a single tract of actively farmed arable agricultural land without intervening hedge boundaries, trees or any other natural feature. In visual/landscape terms, it is 'contained' and is not visible from any public viewpoints and there is no public access. The land here is Grade 3 agricultural land and no protective landscape designations apply. On its western and northern boundaries new landscaping belts would be introduced to mitigate any landscape impact but primarily to enhance biodiversity.
- 1.14 It is notable that the ESC settlement fringe sensitivity assessment 2018 (Vol 2), a report produced for the Council as part of the evidence base for the adopted ESC Local Plan 2020, did not consider that Wickham Market should feature as one of the key identified settlements of the wider, former Suffolk Coastal district that required this priority study.
- 1.15 The land is mainly level, north to south, but the larger field slopes down in the lower north easterly section towards the river but that part of this field which is proposed for allocation/development is mainly level.

Indicative Proposed Site Layout (Omission Site)

- 1.16 The proposed indicative layout drawing for the omission site is shown in **appendix 2** to this statement. It illustrates the alternative points of access either by extension to the existing Riverside Industrial Estate Rd. or via an improved access utilising an

existing farm track and access which would then serve both the extended employment land as well as the adjacent proposed residential allocation.

2. Policy WICK1: Development Strategy and Principles

Objection re employment land

- 2.1 The overall approach to meeting the future growth needs of Wickham Market is set out in 'Policy 1' and its supporting text. Mr Carter **objects** to both the policy and the supporting text on the following grounds:

- Employment Land requirement
- The Assessment of the Land north of border Cot Lane Site
- Employment Land Allocations and protection of the existing site

Employment Land Requirement

- 2.2 The local planning authority, East Suffolk Council, has adopted as its development plan, the East Suffolk Local Plan (September 2020). The Plan, referred to hereafter as the **ESCLP** covers the former Suffolk Coastal District within which Wickham Market is located.
- 2.3 The ESCLP sets out the collective strategy and sets out the strategic policies for meeting objectives, such as addressing housing and employment need. Section 4 of the plan addresses the economy Noting that the governments 2017 industrial strategy places emphasis on supporting businesses to enable local economies to prosper. At the local level, the East Suffolk Economic Growth Plan (2018 to 2023) Set the vision as to how this is to be achieved and notes that the local plan will be a key contributor to the delivery of this vision **“by the identification of appropriate land, premises and opportunities for economic growth”**.
- 2.4 The ESCLP Notes further That the local economy is it just about large scale strategic businesses such as the port of Felixstowe Sizewell nuclear power station or BT but that it is much more diverse made-up of many small and medium size enterprises that collectively provide a variety of economic opportunities, jobs and services. Given the diversity and broad based of the local economy the plan focuses on adopting policy which will foster the local economy at all levels and provide the opportunity for prosperous growth **“with a combination of suitable sites for serviced employment land and supporting infrastructure”** (Para. 4.9).
- 2.5 While setting out policies designed to protect existing employment areas, the ESCLP notes at paras. 4.12 and 4.13, but neighbourhood plans can address area specific

policies relating to those existing employment areas or indeed to cater for future needs. Providing for new employment development in a plan such as a neighbourhood plan, can provide opportunities for new local and inward investment to come forward over the plan which will improve the economic vibrancy and enterprise in the locality and across the wider plan area.

- 2.6 Policy SCLP 4.2 Of the ESCLP, '**new employment development**', supports the delivery of new employment development to provide greater choice and economic opportunities in suitably located areas notes that proposals for new employment development falling within use classes B1, B2 and B8 outside of existing employment areas but within settlement boundaries will be supported where they do not have an unacceptable impact on surrounding land use living conditions of local residents and the local highway network.
- 2.7 However, the local plan policy goes further noting that the same commercial land uses falling within the formal end use categories of B1, B2 and B8, proposed for land outside of settlement boundaries **will be permitted**. This is of course subject to there being demonstrated a need for additional employment land and provided that it does not have an unacceptable adverse impact on interests of acknowledged importance.
- 2.8 The ESCLP (at Policy SCLP4.5) also notes the importance of support to employment activities or land which are neither on recognised or allocated employment areas in rural locations recognising that they are important to support the rural economy and provide a valuable source of local jobs. This echoes planning policy at the national level within the Framework (para84) Seeking to support a prosperous rural economy through the sustainable growth and expansion of businesses in the rural areas.
- 2.9 At the same time there has been a significant structural change in respect of the type of premises required by business given the significant changes to the way that business is done over the last 10 years. As a consequence, many of those commercial premises built and developed only 20 to 30 years ago, are now no longer fit for purpose. Given that the primary thrust of SCLP4.5 is support for the growth and diversification of the rural economy particularly where this will secure local employment, it is important that the opportunity to provide for that growth is taken in the preparation of an up to date Neighbourhood Plan.

- 2.10 The evidence base on which the ESCLP and its policies and proposals is derived, includes the Ipswich Economic Area Employment Land Supply Assessment completed by Lichfields consultants for the council in 2017.
- 2.11 The assessment considered 79 sites within the former Suffolk Coastal District categorised as:-
- Suffolk Coastal SHLAA (2014) Employment Site;
 - Sites submitted to the Suffolk Coastal Call for Sites process (2016); and
 - Employment Allocations (Site Allocations, Area Specific Policies Development Plan Document, adopted 2017 and
 - sites within the Felixstowe Peninsula Area Action Plan adopted in January 2017).
- 2.12 Of its key findings, those worthy of note for the purpose of this objection include the fact that there was a notable clustering of sites in the southern part of the district, around Felixstowe and along the A12 and A14. Of the 24 existing employment sites, by Lichfield criteria, over 40% (10) were considered unsuitable despite them being in active operational employment use. A further 36 of the 79 sites were considered to be entirely unsuitable and were filtered out.
- 2.13 Paragraph 3.8 of the Litchfield report is worthy of specific consideration in the context of Mr. Carter's proposal to provide employment land in Wickham Market. It is reproduced below (with bold emphasis added by Artisan).

“Of the remaining 55 proposed employment sites (this includes sites which are partly existing employment sites) the study has identified no deliverable sites which are considered to be suitable, available and achievable for employment development. This is largely because there are a total of 29 proposed employment sites which are not deliverable or developable based on current information including sites where ownership information is not available. **All of these sites are however suitable and if further information were submitted to overcome the unknown factors concerning availability and achievability they potentially could be reassessed as being deliverable or developable sites through the development of the Local Plan**”.

The Assessment of the Land north of border Cot Lane Site

- 2.14 The land which is the subject of this representation is one of those sites referred to in the preceding paragraph (final sentence) and evidence of that positive assessment is advanced in the specific site assessment proforma for the land in question. It appears as **appendix 3** to this Statement. In the first instance, the existing employment allocation known as the Riverside Industrial Estate is assessed but this is

then followed by the assessment of the land bid represented by site number 785 in the Council's SHELAA Assessment, 2018.

- 2.15 Without wishing to sound critical of the Lichfield Report, the assessment's conclusion was negative, purely on the basis that the assessor did not have enough information at the time of production of the report but otherwise, all other criteria were either assessed positively or where matters/issues/features were unclear, would easily be resolved in the context of a planning application or further submission. In summary, the assessment of the land bid site concluded:-

“Based on the adjacent industrial estate, this site could become attractive through development. On Riverside Industrial Estate there are a range of businesses with few vacant units, some units appear relatively new”.

- 2.16 The key constraint identified at the time appears to have been:-

“This site is suitable and would form an extension to the existing employment site, however the access to the site is unclear. This could be achieved via the existing industrial estate to the south, which could potentially lead to a ransom strip, or access improved to the west of the site down the existing farm track. Availability and achievability of the site are unknown”.

- 2.17 **Mr. Carter, the landowner confirms that the land is available and that access is achievable either by an extension to the existing road into the Riverside Industrial Estate or via the existing adjacent farm track (improved), just to the west. Such constraints as were identified in the Lichfield assessment are capable of easy resolution with the supply of appropriate detail at application stage. The land can be delivered and ought to be included within the WMNP.**

- 2.18 The Lichfield report (Employment Land Assessment ELSA) found that the sites they assessed across the former Suffolk Coastal district were generally well aligned to the key property market areas and those characterised by stronger market and occupy demand. however, employment land supply was characterised by a number of large sites on the edge of settlements and the strategic road network which presents their own difficulties in terms of delivery.

- 2.19 Whilst the subject land located in Wickham Market off Border Cot Lane and the B1078 has good access to the primary route of the A12, it is acknowledged that it is not located in one of the prime demand areas associated with the more urbanised southern section of the district. Nevertheless, given the council's economic strategy

of ensuring and providing for appropriate growth in the rural areas, it seems logical to provide for this. Demand for the premises located on the Riverside industrial estate has been consistent with low vacancy rates. Given the advent and recent announcement of the project to build Sizewell C, the demand for construction related accommodation and sites for at least the next 10 years during the Sizewell C construction is inevitable.

- 2.20 In addition, the demand for accommodation in relation to the immediate needs of the rural area in this middle part of the former Suffolk Coastal district also seems inevitable. This is evident from the cross section of uses and users of the existing premises in the Riverside industrial estate off Border Cot Lane which the extract from Google Earth below, illustrates.



Google Earth extract December 2022

- 2.21 The Lichfield ELSA advises at para.4.48:-

The Council will need to work with its partners and local stakeholders to ensure that the best located sites with the best prospects of delivery over the plan period are supported to come forward to meet anticipated needs arising within these growth sectors. This is particularly important given the range of challenges faced by the sites considered as part of this ELSA, some of which will need to be overcome before employment development can come forward.

Employment Land Allocation and Protection of the existing use

- 2.22 The importance of the Riverside Industrial Estate to Wickham Market and to the District's wider economy is recognised by the Council at Policy SCLP 12.41 .

12.421 Riverside Industrial Estate is an important local employment site on the edge of Wickham Market with permission for a range of B1 Business and B2 General Industry type uses. The Council is keen to see it retained as a local employment centre, particularly as a number of smaller former employment sites around the village have been lost to other uses.

- 2.23 It is Mr Carters' view that the WMNP should be providing for employment growth accordingly to replace those sites lost to other uses as well as to provide for the immediate future for demand arising from project such as the construction of Sizewell C. Concerns with regard to flooding and water recycle treatment are capable of technical resolution.
- 2.24 This representation objects to the omission of the subject land as an allocation for employment land and for residential development. The objector's intention is that the two 'omission' sites be brought forward and developed together with the employment land serviced and made available before development commences on the adjacent residential land. There is therefore an element of cross subsidy or enabling development between the two but one is not conditional on the other.
- 2.25 A plan produced at a larger scale on an up to date Ordnance Survey base showing the extent of the proposed land for allocation appears as **Appendix 2** to this Statement.
- 2.26 This Statement will now move on to a review of housing need in the context of the WMNP and propose the alternative land forming part of the identified omission site as an immediately deliverable housing site commensurate with the growth strategy adopted for Wickham Market.

3 Assessment of Housing Need

- 3.1 This section addresses the assessment of housing need as presented in the WMNP. In particular, the paragraphs below will consider the following policies and documents:

(a) WICK1

- (b) Housing Needs Assessment dated July 2016, revised in March 2017 produced by AECOM (“**the HNA**”).

- 3.2 Before turning to the WMNP itself, it is important to consider the context in which the policies of the plan are drafted. Therefore, we turn first to the HNA.

Age of the HNA

- 3.3 The HNA forms part of the evidence base for the WMNP is more than five years old and uses evidence that is clearly out-of-date. Indeed, East Suffolk have an affordable housing SPD. This requires that all housing needs surveys are less than five years old. Whilst the SPD does not carry the same status as a development plan document, it indicates the age of evidence that the District Council considers acceptable to meet the aims of its strategic housing policies. The HNA is more than five years old. Accordingly, the evidence underpinning the approach to housing in the WMNP is out-of-date and cannot be said to support the strategic aims of the SCLP.

- 3.4 In its section on neighbourhood planning, the PPG sets out at paragraph 41-040:

What evidence is needed to support a neighbourhood plan or Order?

While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.

[...]

Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.

In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making.

Paragraph: 040 Reference ID: 41-040-20160211

[Emphasis added.]

- 3.5 Therefore, the age of the document alone is sufficient to render it out-of-date and not robust as it does not consider the latest and up-to-date evidence of housing

need. The table below shows the data used in the HNA compared with the data that is now available:

Data Used	Data Now Available
Ipswich Housing Market Area Strategic Housing Market Assessment Update (August 2012) ¹	Ipswich Housing Market Area Strategic Housing Market Assessment Update (2018)
Suffolk Coastal District Local Plan: Core Strategy & Development Management Policies (Suffolk Coastal District Council, July 2013)	East Suffolk Council: Suffolk Coastal Local Plan (September 2020)
2012-based DCLG household projections	Household projections: <ul style="list-style-type: none"> • 2014-based² • 2016-based • 2018-based Census 2021 (population data released on 28 June 2022)
Housing Register findings as at 9 th June 2016	More recent Housing Register data should be obtained given this is more than 6 years old

Calculation of Need

3.6 The HNA uses four different projections:

(a) The first is derived from Suffolk Coastal Core Strategy up to 2027 and DCLG household projections 2027-2036. There at least four problems with this.

- (i) First, this clearly uses the figures from the strategic policies of the now withdrawn/superseded Core Strategy. This has not been updated to consider the SCLP, which was adopted two years ago.
- (ii) Second, policy SP2 of the old Local Plan was consistently found to be out-of-date and not reflect the objectively assessed housing need for the area. It was found by a catalogue of Inspectors, the Secretary of State and

¹It is important to note paragraph 46 of the HNA. This notes that the 2012 SHMA was in itself an update of the 2008 SHMA. The latter was based on the 2001 Census and housing need survey data from 2005-2008. Paragraph 46 of the HNA notes that the 2011 Census was not used and urges caution as a consequence.

² Notwithstanding paragraph 88 of the HNA, it is considered that the 2014-based should now be used at the very least in order to be consistent with the calculation of district need in the standard method, which in turn underpins the SCLP strategic policy

indeed the Supreme Court³ to not be the correct figure for housing need in the area.

(iii) Third, the old Core Strategy and the newly adopted Local Plan overlap insofar as the plan period is concerned. The years 2018-2027 is covered by both plan period. However, the annual housing need identified in the more recent Local Plan significantly exceeds that in the old Core Strategy. Consequently, the HNA will have underestimated the level of need for the Neighbourhood Plan area.

(iv) Fourth, for the years beyond the now superseded Core Strategy, the HNA uses the 2012-based DCLG household projections. These are now significantly out-of-date. At the very least, the 2014-based figures should be used to be consistent with the most recently adopted SCLP, which used the Standard Method to assess its local housing need. However, it is considered that the more recent population projections should also be reviewed to assess whether this makes a material difference to the assessment of housing need. In summary, the first approach is based on a now withdrawn development plan document as well as out-of-date household projections.

(b) The second approach uses only the 2012-based household projections. The comments about these projections set out above are repeated.

(c) The third approach uses dwelling completion rates between 2001-2011. However, the report notes a few pages later: *“The number of dwellings in Wickham market grew by 12 units between 2001 and 2011 from 994 to 1,006. This equates to a 1.2% rate of dwelling growth which is a very low figure when in comparison to the district growth of 9.7%.”* This approach to calculating future housing need is based upon a “very low” growth over a ten-year period, which is all pre-NPPF. It is not therefore considered to be a robust starting point for an assessment of housing need today.

(d) The final approach uses dwelling completion rates between 2011 and 2016, which is the date of the report (it is not clear whether this was amended in the 2017 revision). It is worthwhile remembering that during this period, the district council was plagued with a persistent lack of housing land supply as required by the NPPF. This would have constrained completion rates as fewer than required

³ *Suffolk Coastal District Council v Hopkins Homes Ltd and another* [2017] UKSC 37, [64].

sites came forward. It is not clear what provision, if any, has been made for this in the calculation of need. More recent data is required to check whether the findings of some five years ago are still appropriate.

- 3.7 Whilst the HNA would have been appropriate when it was first published, it is clearly now out-of-date and it is no longer robust. It needs to be revised with a review of more recent data, as well as the most recently adopted development plan documents for East Suffolk.
- 3.8 Moreover, the HNA advises caution in using the DCLG projection need figure as it is 'unconstrained' and is 'driven by demand'. However, the standard method assesses the population change and applies an uplift based 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.

Dwelling Completions

- 3.9 Paragraph 149 of the HNA states:
 Wickham Market has already seen 101 homes completed between 2011 and 2016. This leaves a residual demand range of 32 to 110 dwellings up to 2036.
- 3.10 Therefore, HNA deducts 101 dwellings from the calculation of need as they have been delivered. However, these dwellings were completed between 2011 and 2016. This does not relate to the period of time that the WMNP seeks to cover (2018-2036).
- 3.11 The strategic policies in the most recently adopted SCLP seek to address the needs of the wider district between 2018-2036. Therefore, the WMNP deducts dwelling completions from its assessment of need before the time that both the WMNP and the SCLP strategic policies seek to address.
- 3.12 It is considered to be inappropriate to deduct dwelling completions before the plan period from need within the plan period. It is possible that the housing need figure in the WMNP is unduly low as a result.
- 3.13 Moreover, given the age of the evidence, dwelling completions and housing delivery rates from the most recent five years have not been considered. It is therefore impossible to assess whether the approach in the HNA is still robust or whether it supports the strategic policies in the SCLP.

WICK1

- 3.14 In light of the above, the following sets out the specific **Objections** in respect of WMNP policy WICK1. An assessment of WICK1 against the Basic Conditions is set out in section 4

Paragraph A

- 3.15 Our client objects to the allocations referred to in this paragraph. More detail of these objections is set out in the following section.

Paragraph B

- 3.16 As discussed above, the calculation of 110 dwellings is not robust, it is based upon wildly out-of-date data, relies upon the now withdrawn Suffolk Coastal Core Strategy, it deducts completed dwellings from outside the plan period, it fails to consider more recent data and it fails to consider more recent strategic and national planning policy. It clearly, does not meet the requirements of the PPG.

Paragraph C

- 3.17 This merely requires compliance with the SCLP and is therefore superfluous as the SCLP is already part of the development plan for planning applications in the Wickham Market area.

Paragraph D

- 3.18 The first bullet point will require development to address “evidence-based needs as set out in the Wickham Market Housing Needs Assessment.” In light of the above discussion as to the robustness of that evidence now in 2022/23, this requirement is plainly inappropriate.

4. Housing Site Selection

- 4.1 This section considers the site selection process and the evidence underpinning that exercise resulting in the two allocations in WICK12 and WICK13.

Site Assessment Report (February 2018)

- 4.2 The Site Assessment Report (“**the SAR**”) was prepared by AECOM and is dated February 2018. Just like the HNA discussed in the previous section, the SAR is also out-of-date and has been overtaken by events. Consequently, it also omits highly relevant information that was published after the SAR. It can no longer be considered a robust in accordance with the PPG. ⁴

⁴ Paragraph 41-040 – see paragraph 3.4 of this document.

- 4.3 In December 2018, East Suffolk Council published its Strategic Housing and Economic Land Availability Assessment (“**the SHELAA**”). Indeed, the entire approach set out in the SAR is underpinned by the old Suffolk Coastal District Council SHLAA dated 2014. The SAR therefore needs to be reviewed to take account of this more recent information.
- 4.4 The SAR also predates the updated Neighbourhood Planning Toolkit in 2021. The SAR is instead based upon the 2015 toolkit, which was specifically updated to respond to changes in the Framework and the PPG.
- 4.5 Moreover, the SAR was prepared prior to the proposed designation and allocation of various protective policies under the WMNP. Therefore, when the sites were assessed the SAR did not take these various constraints into account. Some of these are considered below in the context of WICK12 and WICK13.
- 4.6 Insofar as the SAR assesses the potential land for allocation, only two completed Site Appraisal Pro-Formas are supplied. These are for the two sites which go on to form the proposed allocations under WICK12 and WICK13. Whilst specific comments are made in respect of these proposed allocations, it is considered that the evidence base is substantially incomplete without a similar assessment of all the sites to support the conclusion that only WICK12 and WICK13 are suitable for allocation.
- 4.7 Consequently, the evidence supporting the review of all the potential sites and underpinning the site selection process is plainly not robust.

WICK12

- 4.8 There are significant issues with this proposed allocation, such that our client **Strongly Objects** to its inclusion in the WMNP. These issues relate to the following:
- (a) Impact on heritage assets
 - (b) Impact on Key View(s)
 - (c) Potential title issues impacting deliverability/availability
 - (d) Potential issue relating to a gas pipeline
 - (e) SHELAA Assessment
- 4.9 Each of these will be considered in turn.

Heritage Impact

- 4.10 One of the consequences of the SAR predating the draft policies in the WMNP is that the assessment of sites fails to take account of new protective policies and designations that emerge with the WMNP. This is the case in respect of heritage issues.
- 4.11 Whilst nationally protected buildings and land will have been known at the time the SAR was prepared, the proposed listing of non-designated heritage assets (“**NDHA**”) would not have been clear at the time. This explains why the Pro-Forma for this site attached in Appendix A to the SAR records that: *“There are no heritage assets within or adjacent to the site.”* With the proposed listing of The Old School⁵ and the Parish Cemetery and Bier House,⁶ the assessment in the SAR is clearly now wrong and requires reassessment.
- 4.12 Indeed, proposed policy WICK8 requires that there should not be substantial harm to the physical structure or the setting of the NDHAs without clear and convincing justification in a heritage statement. We have seen no such clear and convincing justification.
- 4.13 Accordingly, there are significant heritage considerations with this proposed allocation that have not been taken into account. This alone should justify the deletion of this proposed allocation on the basis that its selection appears to be unsupported by robust evidence and it appears to be contrary to other policies in the WMNP, namely WICK8.

Key View(s)

- 4.14 Just as the SAR failed to take into account heritage considerations in the site assessment process, it also failed to consider the proposed allocation of various key views in the plan area.
- 4.15 In the case of WICK12, there are two if not three Key Views impacting the site. Proposed policy WICK3 requires that development protects, if not enhances, these key views. Clearly the development of this site will neither protect nor enhance any of the key views proposed under the WMNP.
- 4.16 Key view 12 is across an open arable field towards the landmark church spire as set out on page 10 of the key views assessment. The development of this site will

⁵ Listed at number 6 in the list of NDHAs in the WMNP.

⁶ Listed at number 16 in the list of NDHAs in the WMNP.

obscure almost entirely the existing view of the landmark church. The existing glimpses of houses of Wickham market will be replaced with residential development much closer 2 walnuts lane. Accordingly, the quality of key view 12 will be substantially undermined and eroded by the allocation of WICK12 for development.

- 4.17 Key view 11 is a long distance OpenView across arable fields towards Pettsitree Church, with the boundaries of the cemetery also visible. The development of this site will also obscure this key view to a significant degree. The quality of key view 11 is, therefore, also under threat from this proposed allocation off site WICK12.
- 4.18 Given the order of events, it does not appear that the SAR took into consideration these protected views when it assessed the suitability of all the prospective sites when conducting its appraisal. This further justifies the deletion of allocation WICK12 on the basis that it is not supported by robust evidence and it appears to conflict with proposed policy WICK3.

Title Issues

- 4.19 An inspection of the title register for land including WICK12 reveals that there are potential restrictive covenants that might prohibit this site ever coming forward. Whilst the accompanying title plan was not available online, the list of covenants on the register indicate that day is a restriction prohibiting direction of any building on the land and further that the land must only be used for the purpose of agriculture.
- 4.20 As noted above, we were not able to obtain a title plan and so some caution must be taken in the assessment of these restrictive covenants, it is considered that they are potentially fatal to the success or otherwise of this allocation. Therefore, further evidence is needed to demonstrate that there are No title issues and that the restrictive covenant entries do not apply to the allocated land.

Gas Pipeline

- 4.21 The title register also makes reference to an easement for a main gas pipeline. evidence is needed to demonstrate that they proposed allocation and residential development of this land will not cause any issues in respect to this pipeline, if indeed it runs across the proposed allocated land.
- 4.22 In the event that the gas pipeline does run across this land, then the impact on the number of dwellings start might be deliverable on this site needs to be assessed.

SHELAA Assessment

- 4.23 This site was submitted and considered as part of the east Suffolk SHELAA, with reference 499 (see the map produced at **Appendix 5**). The assessment of this site under the SHELAA is provided at **Appendix 6**. In summary, they were identified issues in respect of access, landscape and townscape, biodiversity, the historic environment, transport and roads and the compatibility with neighbouring uses. All of these were assessed as having an ‘amber’ impact.
- 4.24 Specific comments were made in respect of each of the amber-scoring criteria. These include the potential for impact on the Wickham Market conservation area, impact on the Pettistree conservation area call mom impact upon the cemetery, the site being identified as having potential archaeological value and given the trees and hedges around the site, it is considered to be of biodiversity interest.
- 4.25 It is unfortunate that the SAR was not updated following the publication of the East Suffolk SHELAA. Had it been updated, it would have been able to respond to the identified potential issues raised and there would have been some justification for the continued allocation of this site. In the absence of such evidence or justification, the inclusion of this site as a proposed residential allocation is clearly not robust.

WICK13

- 4.26 Our client **Objects** to the allocation of this site on the basis of the following issues:
- (a) Heritage impact
 - (b) SHELAA Assessment

Heritage Impact

- 4.27 This largely reflects the consideration of heritage impacts above in respect of site WICK12 and most of the comments therein also apply here.
- 4.28 The appendix to the SAR containing the pro forma for this site also considered that there were no heritage assets within or adjacent to the site. However, the now proposed listing of the Pill Box on the northwest corner of the proposed allocation⁷ was clearly not taken into account during the assessment or suitability for development.
- 4.29 There appears to be the same absence of robust evidence supporting the continued allocation of this site as well as the apparent conflict with proposed policy WICK8

⁷ Listed at number 5 in the list of NDHAs in the WMNP.

through the significant adverse change within the setting of the heritage asset.
There is no clear and convincing justification set out for this proposed allocation.

SHELAA Assessment

- 4.30 This site was also considered as site 1114 under the SHELAA. The SHELAA assessment of the site is produced at **Appendix 4**. There are amber scores against the access to the site, utility's, landscaping townscape, biodiversity, open space and transport and roads.
- 4.31 Whilst the historic environment criterion scored green in this assessment, in light of the proposed designation of the adjacent Pill Box as an NDHA, this will need to be reassessed.

Appendix 1 - Omission site extracts: SHELAA Site Assessment December 2018

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Site Details

Parish / Town	Wickham Market
Site reference	785 Land to the north of Border Cot Lane Industrial Estate
Site Area (hectares)	1.39
Proposed use	Employment
Existing land use	Agriculture
Neighbouring land uses	Employment area to the south, agricultural to the north, west and east

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	The site adjoins Playford Lane but this boundary is heavily treed and hedged. Playford Lane is narrow.
Utilities capacity	Amber	The Water Cycle Study identifies potential Water Recycling Centre capacity issues.
Utilities Infrastructure	Green	No issues identified.
Contamination	Green	No issues identified.
Flood Risk	Green	No issues identified.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Green	Agricultural field in use for crop production bounded by hedgerows and trees.
Biodiversity	Green	Agricultural field in use for crop production bounded by hedgerows and trees.
Historic Environment	Green	Agricultural field adjoining Rushmere village that is not a conservation area.
Open Space	Green	No issues identified.
Transport and Roads	Amber	Cumulative impacts on narrow roads.
Compatibility with neighbouring uses	Green	Agricultural field adjoining Rushmere village.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion	Potentially suitable for employment use. Issues to address include access and highways impacts.
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Availability

Is the site available?	Yes
Evidence of availability / comments	Landowner submission

Achievability

Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Estimated dwellings yield	-
Estimated employment land yield (hectares)	1
Estimated retail floorspace (sqm)	-
Estimated commencement date	2021/22

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Site Details

Parish / Town	Wickham Market
Site reference	1045 Land adj. to British Telecom Telephone Exchange, Border Cot Lane, Wickham Market
Site Area (hectares)	1.38
Proposed use	Housing
Existing land use	Agricultural land
Neighbouring land uses	Adjacent established employment area. Consider for employment growth.

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Direct vehicle access to B1078 is available. Footway to opposite side of road. Hedgerows to site boundary along B1078. Limited footway provision.
Utilities capacity	Amber	The Water Cycle Study identifies potential Water Recycling Centre capacity issues.
Utilities Infrastructure	Green	No issues identified.
Contamination	Green	No issues identified.
Flood Risk	Green	No issues identified.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Green	Hedgerow Survey: Poor. Sensitive landscape setting.
Biodiversity	Amber	BAP species identified.
Historic Environment	Green	Coin hoard found.
Open Space	Green	No issues identified.
Transport and Roads	Amber	Cumulative highways impacts. Limited footway provision.
Compatibility with neighbouring uses	Amber	Adjacent established employment area. Consider for employment use.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion	Potentially suitable. Issues to be addressed include; biodiversity value, highways impacts, and compatibility with neighboring uses.
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Availability

Is the site available?	Yes
Evidence of availability / comments	Landowner submission

Achievability

Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Estimated dwellings yield	21
Estimated employment land yield (hectares)	-
Estimated retail floorspace (sqm)	-
Estimated commencement date	2021/22

Appendix 2 - Ordnance Survey Plan of Omission Site with indicative layout



Appendix 3 - Extracts of site assessment- Ipswich Economic Area Employment Land Supply Assessment: Suffolk Coastal - March 2018

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Site Details

Parish / Town	Wickham Market
Site reference	1045 Land adj. to British Telecom Telephone Exchange, Border Cot Lane, Wickham Market
Site Area (hectares)	1.38
Proposed use	Housing
Existing land use	Agricultural land
Neighbouring land uses	Adjacent established employment area. Consider for employment growth.

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Direct vehicle access to B1078 is available. Footway to opposite side of road. Hedgerows to site boundary along B1078. Limited footway provision.
Utilities capacity	Amber	The Water Cycle Study identifies potential Water Recycling Centre capacity issues.
Utilities Infrastructure	Green	No issues identified.
Contamination	Green	No issues identified.
Flood Risk	Green	No issues identified.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Green	Hedgerow Survey; Poor. Sensitive landscape setting.
Biodiversity	Amber	BAP species identified.
Historic Environment	Green	Coin hoard found.
Open Space	Green	No issues identified.
Transport and Roads	Amber	Cumulative highways impacts. Limited footway provision.
Compatibility with neighbouring uses	Amber	Adjacent established employment area. Consider for employment use.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion: Potentially suitable. Issues to be addressed include; biodiversity value, highways impacts, and compatibility with neighboring uses.

Availability

Is the site available?	Yes
Evidence of availability / comments	Landowner submission

Achievability

Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Estimated dwellings yield	21
Estimated employment land yield (hectares)	-
Estimated retail floorspace (sqm)	-
Estimated commencement date	2021/22

Appendix 4 - SHELAA Site Assessment December 2018 for site 1114.

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Site Details

Parish / Town	Wickham Market
Site reference	1114 Simons Cross Allotments, Wickham Market
Site Area (hectares)	1.26
Proposed use	Housing
Existing land use	Allotments
Neighbouring land uses	Residential to east. Vacant land to the north, west, and south.

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Access only appears feasible via Simon's Cross.
Utilities capacity	Amber	The Water Cycle Study identifies potential Water Recycling Centre capacity issues.
Utilities Infrastructure	Green	No issues identified.
Contamination	Green	No issues identified.
Flood Risk	Green	No issues identified.
Coastal Change Risk	Green	No issues identified.
Market Attractiveness	Green	No issues identified.
Landscape and Townscape	Amber	A public footpath runs across the site, from East to West, and along the Western border. A bridleway borders the site to the east.
Biodiversity	Amber	Trees and hedges border the site on all sides.
Historic Environment	Green	No issues identified.
Open Space	Amber	Development would result in a loss of allotments. Provision for local residents should be provided elsewhere if possible.
Transport and Roads	Amber	Potentially no footway provision.
Compatibility with neighbouring uses	Green	No issues identified.
Contribution to regeneration	Green	No issues identified.

Suitability conclusion	Potentially suitable. Issues to be addressed include; replacement of allotments if needed, access, landscape, biodiversity value, and open space.
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Availability

Is the site available?	Yes
Evidence of availability / comments	Landowner submission

Achievability

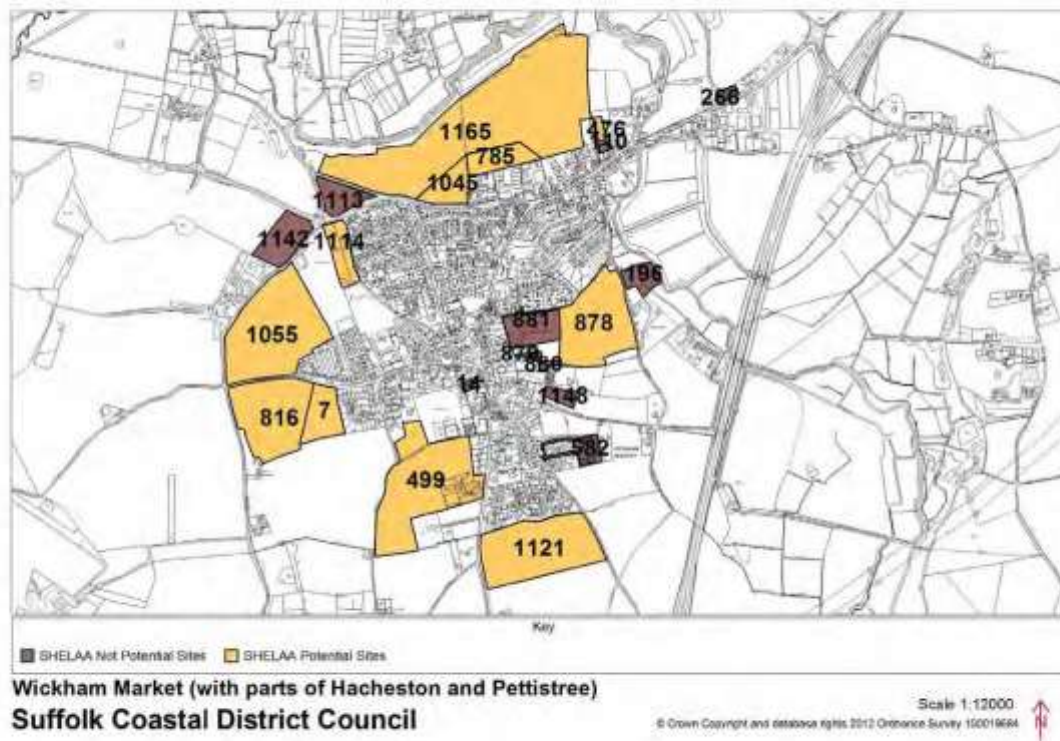
Is the site achievable?	Yes
Evidence of achievability	Assumed - replacement of allotments may be needed
Are there any commencement issues?	Replacement of allotments

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Estimated dwellings yield	19
Estimated employment land yield (hectares)	-
Estimated retail floorspace (sqm)	-
Estimated commencement date	2024/25

Appendix 5 - SHELAA 2018 map

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment
Map Book (December 2018)



Appendix 6 - SHELAA extract for site 499

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

Site Details

Parish / Town	Wickham Market
Site reference	499 Land West of Old School Farm, High Street, Wickham Market
Site Area (hectares)	7.91
Proposed use	Housing
Existing land use	Agriculture and buildings
Neighbouring land uses	Site adjoins Pettistree conservation area that contains a number of Listed Buildings.

Suitability Assessment

Criterion	Impact	Comments
Access to site	Amber	Existing vehicle access in place serving employment / commercial uses within the south east of the site.
Utilities capacity	Amber	The Water Cycle Study identifies potential Water Recycling Centre capacity issues.
Utilities Infrastructure	Green	No issues to address.
Contamination	Green	No issues to address.
Flood Risk	Green	No issues to address.
Coastal Change Risk	Green	No issues to address.
Market Attractiveness	Green	No issues to address.
Landscape and Townscape	Amber	The site adjoins a conservation area and cemetery. A treelined footpath cuts across the site. Other trees within the site and to site boundaries.
Biodiversity	Amber	Trees, hedgerows, shrubs and overgrown grassed areas within the site are likely to be of biodiversity interest.
Historic Environment	Amber	Site adjoins Pettistree conservation area that contains a number of Listed Buildings. The site also adjoins a cemetery. SCC Archaeological Survey has identified the site as of potential archaeological value.
Open Space	Green	The site adjoins a cemetery.
Transport and Roads	Amber	Cumulative highways impacts to local roads. Footway widening required along frontage plus potential improvements to Walnuts lane towards school.
Compatibility with neighbouring uses	Amber	Site adjoins Pettistree conservation area that contains a number of Listed Buildings.
Contribution to regeneration	Green	The site contains existing employment / commercial units that are occupied.
Suitability conclusion	Potentially suitable. Issues to be addressed include; access, landscape / townscape, biodiversity, historic environment, highways impacts and compatibility with neighbouring uses.	

Availability

Is the site available?	Yes
Evidence of availability /	Landowner / developer

Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018)

comments

Achievability

Is the site achievable?	Yes
Evidence of achievability	No specific issues or abnormal costs identified
Are there any commencement issues?	None identified

Estimated dwellings yield	119
Estimated employment land yield (hectares)	-
Estimated retail floorspace (sqm)	-
Estimated commencement date	2020/21

East Suffolk Council

The preparation of the Neighbourhood Plan for Wickham Market is supported by the Council and the Submission Neighbourhood Plan represents the significant work that the community have put in to preparing their Plan.

The Council has supported the preparation of the Neighbourhood Plan and has provided comments at earlier stages, however has some comments to make at this stage as set out below.

We are particularly supportive of the positive approach that has been taken to allocating land for future housing development. This approach aligns with the ambitions of Policy SCLP12.1 'Neighbourhood Planning' of the Suffolk Coastal Local Plan which sets a minimum figure of 70 dwellings to be delivered in Wickham Market over the plan period.

Chapter 2 – Local Context

It could be beneficial to include a reference to the proposed park and ride that is planned for the construction phase of Sizewell C as part of the narrative of 'Wickham Market today'.

Chapter 4 – Development Strategy

Page 14 – Para 4.4 / 4.5 – The Neighbourhood Plan proposes to alter the Settlement Boundary to incorporate the site allocations, as shown on the policies maps in Chapter 10. This approach aligns with that taken in the Suffolk Coastal Local Plan. For clarity, it should be stated that the Settlement Boundary identified in the Neighbourhood Plan (as shown on the Policies Maps) will supersede the Settlement Boundary included in the Suffolk Coastal Local Plan (for information the Local Plan policies map can be viewed here www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/Policies-Maps-Part-2-inc.-Erratum-updated-February-2021.pdf).

Chapter 5 – Landscape and Environment

Page 18 – paragraph 5.5 – the Suffolk Coastal Local Plan (SCLP) is referred to as a draft. This was adopted in 2020 therefore 'draft' should be removed.

Policy WICK4: Provision for Wildlife in New Development

The Council supports this policy promoting Biodiversity Net Gain. The second line of criteria A states that impacts on biodiversity should be 'minimised'. We would recommend that the mitigation hierarchy is referenced here (avoid, mitigate, compensate) in order for the policy to align more closely with national and local policy. The use of 'minimise' does not add anything and may in fact conflict with the policy to provide net gains.

Page 21 – 5.18 – it is understood that the second half of this paragraph relates to solar panels rather than water efficiency. The sentence is confusing here and it should be deleted. Meeting the optional technical standard for water efficiency is highly unlikely to result in viability issues – the Council’s Sustainable Construction Supplementary Planning Document (2022) (www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf - para 2.6) sets out that the cost for meeting the water efficiency standard is reported at £9 per dwelling.

Chapter 6 – Historic Environment

Page 24 – Paragraph 6.6 – policies not represented in full capitals.

Chapter 7 – Transport and Movement

The development of Sizewell C nuclear power station, being brought forward by EDF Energy, has recently had its Development Consent Order approved. Whilst the site of the proposed power station itself is on the coast and some distance from Wickham Market, the approved proposals include a park and ride to the north of the village of Wickham Market, in Hacheston parish. Further information on the proposal can be viewed at [\[Final\] SZC Bk6 ES V4 Ch1 Introduction \(planninginspectorate.gov.uk\)](#). Further information on Sizewell C can be found here: [The Sizewell C Project | National Infrastructure Planning \(planninginspectorate.gov.uk\)](#). While the Neighbourhood Plan makes references to the Sizewell proposals, at paragraphs 5.6 and 7.14, further references would be appropriate now that the Sizewell DCO has been granted.

Additional references would help the plan in terms of its general conformity with the strategic policies in the Suffolk Coastal Local Plan. Policy SCLP3.4 ‘Proposals for Major Energy Infrastructure Projects’, which relates to the Council’s role either as determining authority for development under the Town and Country Planning Act or as consultee on Nationally Significant Infrastructure Projects, outlines the factors that should be considered in relation to the development of Major Energy Infrastructure Projects and criterion a) states that regard will be had to ‘relevant Neighbourhood Plan policies, strategies and visions’.

EDF have been investigating options for mitigating the impacts of additional traffic in the village, working with the Parish Council, East Suffolk Council and Suffolk County Council and a public consultation led by Wickham Market Parish Council was carried out in 2021.

This could be reflected for example in paragraphs 7.11 and 7.14 to explain that proposals for pedestrian and cycle improvements are being considered as part of the package of measures to accommodate the development of the southern park and ride associated with the development of Sizewell C.

Chapter 8 – Site Allocations

As stated above, the Council is supportive of the Parish Council in allocating sites for future housing development in the Neighbourhood Plan. The evidence that has informed the identification of these site allocations is provided primarily in the 2018 Site Assessment Report and the 2022 Sustainability Appraisal and Strategic Environmental Assessment, as well as commentary in the Consultation Statement, which are part of the submitted evidence base. A number of sites were identified and assessed and we expect the Examiner to give consideration to this process as part of the Examination.

Page 32 – Typo – paragraph 8.3 missed

Pages 33/34 – Paragraphs 8.9/8.14 – The first two sentences of the paragraphs do not read well.

Policy WICK12 – Land at Old School Farm

A map showing the site would be beneficial to include here, to show some of the features referred to in the policy. Further, criterion c, in setting policy for the extent of physical development, appears to refer to what is in fact the western edge of the allocation and is therefore likely to be confusing and is arguably not needed.

Policy WICK13 – Land at Simon’s Cross

Same as above – a map would be beneficial.

Policies maps

Since the submission of the Neighbourhood Plan and the beginning of the Regulation 16 Consultation, the Council noted that there were some small differences between the Settlement Boundary as shown on the Wickham Market Neighbourhood Plan Policies Map (Page 42) and the Settlement Boundary as included in the Suffolk Coastal Local Plan (<https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/policies-map/>). These differences were beyond the changes made to include the two site allocations from the Neighbourhood Plan. The Council has since provided a corrected version of the Neighbourhood Plan Settlement Boundary.

The Council has recently undertaken a Community Governance Review (under part 4 of the Local Government and Public Involvement in Health Act 2007). This has resulted in the decision to alter the boundary of the parish of Wickham Market, amongst others. The alteration would result in extending the parish boundary to include the Wickham Gate development area (the site allocated under SCLP12.60 in the Suffolk Coastal Local Plan), which is currently in Pettistree parish. This change will come into effect from 1st April 2023. Further details are available on the Council’s website

here www.eastsuffolk.gov.uk/elections/community-governance-review-cgr/east-suffolk-council-community-governance-review-2021-2022/.

Please note that these comments are given at an Officer level without prejudice to any future decisions that the Council may make. I would be pleased to respond to any questions that you may have.

East Suffolk Internal Drainage Board (Water Management Alliance)

Thank you for consulting the East Suffolk Internal Drainage Board on the Wickham Market Neighbourhood Plan.

Wickham Market falls partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and therefore the Board's Byelaws apply to any development within the IDD.

The principal function of IDBs is to provide flood protection within the Board's area, and certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. Main Rivers within the IDB are regulated by the Environment Agency. Therefore, I recommend that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency.

The area outside the Board's IDD falls within the Board's watershed catchments (meaning water from the site will eventually enter the IDD). The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance [SuDS discharge location hierarchy](#).

Whilst the Board's regulatory process (as set out under the Land Drainage Act 1991 and the Board's Byelaws) is separate from planning, the ability to implement a planning permission may be dependent on the granting of any required Land Drainage Consents.

Please see the list overleaf of the proposed sites for development which we consider may impact the Board's area. The Board would seek to comment on these sites should they come forward for planning permission, alongside an explanation of any potentially required consents should these sites be developed. Please note that this list is not exhaustive and the Board may or may not choose to comment on these and additional site allocations if and when more information is presented.

Site reference	Within IDB / Watershed	Comments
WICK12 WICK13	Within ESIDB watershed catchment	Major residential developments. Whilst outside the Board's IDD, the Board would comment to promote sustainable drainage as any runoff will enter the Board's district indirectly.

In order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes where developments are proposed within or partially within a Board's IDD, please be aware of the following:

Byelaw 3- Discharge of Surface Water into the Board's District

- If a development proposes to dispose of surface water via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.
- If (following testing) a strategy wholly reliant on infiltration is not viable and/or a development proposes to discharge surface water to a watercourse, the proposed development will require consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (available at https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- If a development proposes to discharge surface water to a sewer, I recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in this location.

Byelaw 3- Discharge of Treated Foul Water into the Board's District

- If a development proposes to discharge treated foul water to a watercourse, this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3).

Byelaw 10- Work's within 9m of Board Maintained Watercourse/s

- Should any development include works within 9 metres of a Board maintained watercourse, consent would be required to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).

Section 23 of the Land Drainage Act (1991) and Byelaw 4- Alterations Proposed to a Watercourse

- Should any development include works to alter a Board maintained watercourse, consent will be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).
- Should and works be proposed to alter a riparian watercourse, consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.

For developments outside a Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice:

- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.
- If it is proposed to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the [Non-Statutory technical standards for sustainable drainage systems](#) (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

I recommend that the Neighbourhood Plan includes reference to the relevant regulators for drainage and flood risk (such as the Internal Drainage Boards, the Environment Agency and the Lead Local Flood Authority). These agencies are in place to support the provision of sustainable development and reducing flood risk. As outlined above, works to watercourses

(such as surface water discharges and/or any alterations of said watercourses) will require consent from the relevant regulatory body, therefore it would be beneficial for the regulators to be included in the plan.

If you require any further information or would like to discuss the Board's regulation in more detail, please do not hesitate to contact us.

How to Apply for Land Drainage Consent

To apply for Land Drainage Consent please complete an application form.

Application forms, application fees and 'Frequently Asked Questions' can be found on the 'Development' section of the Board's website, here:

<https://www.wlma.org.uk/east-suffolk-idb/development/>

For any additional help please call us on 01553 819600 or email planning@wlma.org.uk.

Byelaws

East Suffolk IDB Byelaws can be found via the following link:

https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf

Mapping

Mapping of the district can be viewed via the following link:

https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf

Planning and Byelaw Strategy

The Board's Planning and Byelaw Strategy seeks to provide:

- Guidance on how (and why) the Board will review and comment on planning applications.
- Information on the policies against which the Board will assess and determine applications.
- Guidance to riparian (waterside) landowners regarding watercourse maintenance.

The Planning and Byelaw Strategy can be found via the following link:

https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf

Arterial Watercourses

Maps on the Board's website show which watercourses are designated as Arterial Watercourses by the Board. You may also have heard these watercourses referred to as 'Main Drains' or 'Maintained Watercourses'. The designation is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB using the Board's Permissive Powers. Although the Board opts to proactively maintain this arterial network, there is no change in the ownership or liability associated with the watercourse resulting from this designation.

Why we comment on planning applications:

By engaging with the planning process the Board is seeking to:

- Reduce flood risk to communities within the Internal Drainage District
- Promote sustainable development in sustainable locations by supporting sound planning decisions in accordance with the National Planning Policy Framework (especially [Paragraph 167](#)) and the [Non-standard technical standards for SuDS](#).
- Reduce the potential for conflict between the planning process and the Board's regulatory process.

For further information please refer to the Board's Planning and Byelaw Strategy.

Historic England

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we are pleased to note that our comments at previous stages have been taken into account, and we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Jeffrey Hallett

I wish to submit the following comments on the proposed **Neighbourhood Plan for Wickham Market**.

Please note that I am now a resident of Wickham Market and I remain a parish councillor for the adjacent parish of Pettistree.

These are my personal comments.

General

The plan as submitted is an excellent document and has obviously entailed a great deal of work over several years. During this time there have been many changes in plans and policy both locally, and affecting the whole of Suffolk. These have included plans for Sizewell C, and the adoption of the Local Plan for Suffolk Coastal in 2020 that changed Pettistree from "countryside for no further development" to a "small village". This allowed a large housing development (now known as "Wickham Gate" to be built on Pettistree land but included within the settlement boundary of Wickham Market. The complications from this have made the preparation of the Neighbourhood Plan much more difficult, and the consequences are ongoing with the parish boundary now due to be moved from 1st April 2023 to include the development and make its governance much more logical.

Those preparing the Neighbourhood Plan are to be complimented on its thoroughness and detail. It is as clear as can be managed, allowing for the amount of jargon and documentation that is required in this type of proposal. The clarity and accessibility of the maps is unusually good for this type of document. (In my past experience as chairman of Pettistree Parish Council for a total of 18 years.)

2. Local Context

2.1 to 2.3 Good concise and clear historical notes.

2.6 If the restoration of the pub (The George) is successful and proves to be economically viable it will be an undoubted asset to the village. However, it has distracted effort from the improvements needed for the Village Hall. The Village Hall will remain a vital facility for the village as no other facility will have the capacity to accommodate large numbers for meetings and entertainment. More emphasis should be given in the plan to improving and maintaining the Village Hall.

2.8. I am surprised to read that the business community has said that no additional policies are needed to ensure that local business can expand to service the needs of a growing population both in the village itself, and also in the surrounding villages for which Wickham Market is the hub.

The "**Business Survey initial findings**" (27) from 2017, appears to have been thorough, but many of the questions should now be repeated in view of the current availability of practical

electric vehicles, better broadband, need for charging facilities etc. The expectation of business expansion was remarkably low at only 9 out of 47 responses. If the findings were “initial” in 2017 they clearly need to be updated now to see if new policies are needed.

2.10 Personal experience confirms anxiety about potential loss of the Post Office service, the danger to pedestrians at the pinch points near it, the need for parking for those who come from surrounding villages, and the need for access to mobility scooters in this area.

5.3 This section makes no mention of the need to provide for “**Quiet Lanes**” areas that are safe for pedestrians, cyclists, and horse riders to share these lanes with safety, remembering that some will have to be used by very large farm vehicles. Also see 5.6 below.

5.5 I support the insistence that steps must be taken to ensure that the settlements of Wickham Market and Pettistree remain distinctly separated by open countryside.

5.6. The Park and Ride for Sizewell C construction workers will not only affect countryside views but will also attract heavy traffic through and around Wickham Market. This traffic will be made up of actual Sizewell-bound vehicles, but also ordinary traffic trying to avoid the Sizewell Congestion via “rat runs”.

5.12 and 5.13. I echo the need for effective and acceptable drainage of surface water in any developments. The use of underground plastic crate SuDS has been seen to be ineffective in the Wickham Place scheme and the proposed use of surface lagoons in the Wickham Gate development must surely present a risk to children when they fill up, unless permanent unsightly fencing is used.

5.17 and 5.18. I strongly support the requirement for use of solar panels and re-use of domestic water in any new developments. This is conspicuously absent in the recent Wickham Place and Wickham Gate developments.

5.23. It is very helpful to have the **Local Green Spaces** listed and clearly shown on a map.

6.12 It is very helpful to have the **Non-designated Heritage Assets** defined, listed, and clearly shown on maps.

7. TRANSPORT AND MOVEMENT

This is a hugely difficult problem and great efforts have been made in this section of the Neighbourhood Plan to suggest some solutions. Many of them should be helpful but it cannot be certain that the measures that will be required from developers will solve the current problems, let alone those to be expected from further development.

8. SITE ALLOCATIONS.

It is very helpful to have the two sites for potential housing development described and illustrated. (Old School Farm and Simon’s Cross) The restrictions on access from the B1078 are sensible.

9. ACTIONS AND INVESTMENT PRIORITIES

It is very helpful to have an explanation of how CIL money could be used to benefit the community and lessen the strain on it from new developments.

I hope that these comments will be of help to the independent examiners for East Suffolk Council.

John Day

Para no;

2.3 Confirms the historic status of the Village and provides grounds for preservation and development as a heritage centre, the Village was enhanced by the A12 by-pass and has the features and facilities to be a pleasant place for both visitors and residents.

2.12 The target for 70 homes will be subject to recent Governmental revisions of local requirements and may be mostly met by the Simons Cross Allotments development, which is presumably already approved as the trouble was taken to move the allotments.

3.1.5 The Plan recognises the historic character of the Village which should be retained. If Village centre businesses are to be encouraged they will look for footfall, which is partly dependent upon improved parking arrangements.

3.1.6/ 7.2 / 7.5/ 9.3 Parking; on-street and off-street arrangements appear not to be fully covered in the Plan, only stating that a solution will be sought, yet it represents a major factor in the economy and viability of the Village centre. The ability to add a considered solution to the parking problem to the final Neighbourhood Plan should ideally be incorporated, and pressure put upon the authorities who oversee the parking arrangements to accept the views of the village and nearby residents, and also those of the Parish Council. A formal proposal will encourage businesses considering locating here.

3.1.6 Traffic is recognised as a problem with numerous solutions proposed in 7.14. It would be advantageous to give these 'Potential Improvement Works' a stronger status in the Plan, perhaps as 'Proposed works to be carried out, subject to final revisions'

3.2 /18 Makes an objective of 'easing traffic flow through the Village and minimising delays' but it is an accepted fact that traffic takes the easiest and fastest route. A degree of calming and restriction in order to reduce speeds for both safety and pollution reasons should be encouraged, rather than high-speed through traffic.

4. Development strategy- I have read Wickham has a high ratio of Social Housing (35% v 25% average) so no more should be encouraged but a stronger case made for first time buyer houses which will have the benefit of attracting families with potential school age children. Social rented housing alongside owner occupied property probably provides a better-balanced residential mix.

Recent Government relaxations on Village Housing targets should help Wickham's allocation as it is gripped by a traffic flow restriction, and lack of ease of movement both within and round the Village. Fewer smaller residential units should help balance the population mix and help with filling school places and providing an active workforce.

8.10 Land at Simon's Cross. This site was, I thought, an agreed development when the allotments were moved. It is near recreation spaces, the school and walking distance to the Village so seems ideal for young families, and is a preferable option over a productive open field site in a more visible location for development.

4.5 Policy Wick1, Development- D – states; “High quality design of buildings.....conserving, and where possible, enhancing the historic environment”. This should be a mandatory requirement to avoid the Village becoming a settlement of fragmentary designs, as seen in many Suffolk villages which have suffered a fate worse than Wickham Market's. In Wickham many of the houses built over the years have advantageously been clustered together to provide groups typical of their eras' building design, as found in Dallinghoo Road at the Village extremities where there are 1950's, 60's and later groups of buildings which do not unduly clash.

5.2 This entry emphasises that the Church Spire is the Village landmark and the aspect from various viewpoints should be preserved, especially the walking routes and from the Recreation Ground which serves as Wickham's prime parkland area.

6.4 The Neighbourhood Plan indicates that as it is unlikely rear garden developments will preserve and enhance the Conservation Area they will not be supported, and further in WICK7 D state such developments will be resisted. Now may be a good time to add 'and in the close proximity to the Conservation Area', as implied in 6.5., to avoid nearby inappropriate buildings harming the Conservation Area and views.

6.7 This proposed review of the Conservation Area may support the above observation.

6.9-6.11, these 'Non-designated Heritage Assets' are well collated, and this may be an ideal way to obtain general public participation in Village affairs by asking for nominations for sites not shown on maps 10.3 and 10.4

7. Transport

This topic is a major key to making the Village a safe and pleasant place for visitors, shoppers and residents and many points are raised in 7.14, but remain unresolved, and subject to funding as stated in 9.3.

If the Neighbourhood Plan raised these requirements from 'proposed' to 'necessary' in 7.14 it may help the funding prospects. (Stated as 'essential' in 9.3) SCC could be asked if they have undertaken a safety review. My experience is that visitors are shocked to find such narrow pavements in the proximity of often heavy traffic. And little no provision for wheelchairs, prams or pushchairs.

All the necessary improvements in 7.14 are valid. Continental villages often utilise built up guidance kerbs with cobblestoned areas within which still allow for HGV and bus turning but slow normal traffic by narrowing and tightening turns. A prime location would be the

turning from the High Street from the south into the Hill market square at which location, if the radius was tightened, it would slow the motorcycles and cars which often take this turning at high speed. It is immediately before a dropped kerb in the pavement for crossing the road to the bus stop. This could be added to the list at 7.7 and the improvements list at 7.14. Together with widened pavements and 20mph zones I consider these to be the most valuable potential contributions to Village safety.

One of the Transport consultations resulted in questions of why the southbound A12 was not accessible to head south when passing over the Woodbridge road in Pettistree beyond our village outskirts. I believe it was planned to go through Ufford before joining the A12 to avoid a huge increase in traffic through Wickham Market village centre, both round the Hill and in the High Street single lane sections.

5.6 the Park and Ride for Sizewell at Hatcheston will provide Wickham with a series of additional problems and reinforce the case for making the Village a 'slowly but safely' area to discourage motorists using it as a shortcut. The proposed modifications in 7.14 can be adjusted to make Wickham a destination rather than a cut-through. Proposals made by the Sizewell developers will have to be very carefully considered.

9.5 ID item 9, Improving Youth and Play Facilities.

There seems a need to consider the requirements of the teenagers in the Village.

The Neighbourhood Plan might usefully be enhanced by making more of a feature concerning younger residents, which would show the community is trying to understand the needs of all the population. The skatepark and basketball court appear well used in summer.

Martin Corral

I am writing to object to your proposal to build 85 houses on land surrounding Old School Farm.

Until the highways authority upgrade the many inadequate roadside footpaths within the village and tackle the issue of speeding traffic with 20mph zones it seems laughable to be proposing yet further residential development.

National Grid (Avison Young)

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director Spencer

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be

downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to

check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England acknowledges that two site allocations have been made in Wickham Market Neighbourhood plan in addition to those in the local plan, namely land at Simon's Cross and at Old School Farm, Highstreet. Natural England has assessed these site locations in relation to protected sites, and agree with comments made to providing a financial contribution to the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and also commend policies identifying the need for well-designed open space and green infrastructure.

Therefore, based on the plan submitted, Natural England has no objection.

However, we provide the further advice below with regard to the provision of green space and also the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

Recreational Disturbance & Green Infrastructure

It is considered that for larger residential developments (50 units +, or equivalent, as a guide) within the 13 km Suffolk Coast RAMS zone of influence are not able to fully mitigate the adverse impacts on European designated sites with a RAMS payment alone. Natural England recommends therefore that these developments include the provision of well-designed open space / green infrastructure (GI), that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the development site boundary and / or bespoke mitigation measures. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a **local landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³

<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹, such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

⁹

<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹ or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

¹¹

<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Ruth Grant

Pedestrian safety

The plan has nothing about the pavement from the southern entrance of the village. This exists only on the west side for most of the distance into the centre. It is extremely narrow and ill-maintained. Most of the houses recently built and being built are on the east side. There is no crossing from east to west until one reaches the village centre. Children from the new housing are required to cross the road for the (unmarked) bus stop heading north. At that point the pavement is about one person wide. The road from the new 30mph sign almost to the Coop is itself wide (it was the former A12) and includes a hatched central section to discourage traffic from overtaking. That section could be removed and the pavement widened. Consideration should also be had to creating a pavement on the eastern side of the road into the village. Alternatively at least 2 pedestrian crossings should be added, to allow access to the north bound bus stop and outside the entrances to the new estates on the eastern side of the road.

Simon Harrington

Paragraph 7.14, bullet point 7

The policy refers to the creation of 20mph zones in different locations. I disagree with a piecemeal approach to traffic calming in the centre of the village and contend that a 'central village zone' is required to cover all the area identified by the NP as being hazardous for pedestrians and cyclists. In order to create a vibrant and inviting village centre a 'shared space' approach is required where pedestrians can move about without risk. This requires traffic speeds to be slowed and a re-calibration of the relationship between vehicles and pedestrians where they have equal rights to the space.

Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Wickham Market Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

We thank the Neighbourhood Planning Group for making the amendments we suggested. We have no further comments to make at this time.

We wish to be kept informed of this plan as it progresses.

Suffolk Fire & Rescue Service

On behalf of the Suffolk Fire and Rescue Service our Area Manager has sent you his response.

Thank you for the Wickham Market Neighbourhood Plan.

Suffolk Fire & Rescue Service has considered the plan and are of the opinion that, given the level of growth proposed, we do not envisage additional service provision will need to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change. As always, SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard access, as long as access is in accordance with building regulation guidance. We will of course wish to have included adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.

Suffolk Wildlife Trust

Thank you for your consultation on the draft Neighbourhood Plan for Wickham Market.

Suffolk Wildlife Trust is pleased to see Policy Wick4: Provision for Wildlife In New Development, which seeks to protect features of biodiversity, provide net gains for biodiversity and requires SuDS provision to be designed to enhance green infrastructure, wildlife and biodiversity.

Paragraph 174 (d) of the National Planning Policy Framework (NPPF) 2021 states that *Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*

Whilst Policy Wick 4 refers to enhancing green infrastructure in relation to SuDs provision, this is not sufficient to meet the wider requirement in the NPPF to establish coherent ecological networks. Government policy in the 25 Year Plan for the Environment, the NPPF and the Environment Act 2021 recognises that we are in the midst of a climate change and biodiversity crisis and that nature recovery measures are essential for addressing these issues. The Government White Paper, Making Space for Nature (2012), proposed that coherent ecological networks should be established, linking up the fragments of high biodiversity which have survived, expanding them and enhancing habitat quality and connectivity for wildlife between them. It is no longer sufficient merely to protect the small areas of wildlife rich habitat which have survived. Neighbourhood Plans are an excellent opportunity for local communities to determine where such networks could be established and what measures are needed to implement them. The requirements for biodiversity net gain and enhancement enshrined in the NPPF and the Environment Act 2021 present an opportunity to focus enhancement and biodiversity net gain on improving habitat and connectivity in such networks.

Furthermore, paragraph 179 of the NPPF states that:

To protect and enhance biodiversity and geodiversity, plans should:

- (a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- (b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*

This draft of the Wickham Market NP does not currently meet this requirement as there is no indication that components of wildlife-rich habitats, wildlife corridors and stepping stones have been identified and mapped in the plan, and there is no reference to promoting the conservation, restoration & enhancement of priority habitats (as identified through Section 41 of the Natural Environment & Rural Communities Act 2006), or of ecological networks, or the protection or recovery of priority species. We therefore suggest that a map is inserted into the plan which meets the requirements of 179 (a), similar to those already provided for views, non-statutory heritage assets, landscape character and local green spaces, and that Policy Wick 4 is amended, or a new policy is inserted, to cover these aspects. A good example from another Neighbourhood Plan in Suffolk, which uses the term “green corridors” to be synonymous with ecological networks/wildlife corridors, states:

Policy 4: Biodiversity and Green Corridors

New development proposals must recognise the identified Green Corridors (see Figure 7 and the Policies Map in Appendix A) and address the following matters:

- a) Development within a Green Corridor must deliver measurable net gains in biodiversity which exceed national or local policy requirements or deliver qualitative improvement on site or to the corridor. This should relate to quality of habitat or its ability to facilitate movement of fauna or flora.
- b) Proposals adjacent to Green Corridors must maintain and where possible enhance the function of the corridor and demonstrate how they will mitigate any significant harm to the wildlife using it. Harm is likely to be caused by the introduction of barriers, such as housing, roads, hard landscaping and artificial lighting, the re direction of water sources or water courses, or the insensitive management of habitats e.g. hedge cutting in the bird breeding season.
- c) Proposals that support improvement to the function of a Green Corridor will be looked upon positively.
- d) In the parish, if a development, following through the metric related to biodiversity net gain as required by the Environment Act 2021, needs to deliver the net gain off site, then the requirement will be to deliver this net gain in the identified green corridors, working with local landowners.

Consideration will need to be given to the impact that allocated sites within the local plan have on the Green Corridors. Where possible the principles above should be followed.

Information on priority habitats and species and locally designated sites of importance for biodiversity can be obtained from the Suffolk Biological Information Service (<http://www.suffolkbis.org.uk/>). If the Parish Council would like any assistance in determining where to place wildlife corridors and what measures could be used to implement them, the Suffolk Wildlife Trust’s Community Conservation Adviser, Cathy Smith, may be able to give advice. If the Parish Council would like to carry out a more

comprehensive wildlife audit for the parish, which would provide up to date information, this could be commissioned from the Trust's ecological consultancy [Ecological consultancy | Suffolk Wildlife Trust](#).

We hope this is useful. Please do not hesitate to contact us using the email address below should you require anything further.

Ufford Parish Council

Ufford Parish Council wish to record their support for Wickham Parish Council's Neighbourhood Plan