

# **Wickham Market Neighbourhood Development Plan 2018-2036**

**A report to East Suffolk Council on the Wickham  
Market Neighbourhood Development Plan**

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## **Executive Summary**

- 1 I was appointed by East Suffolk Council in January 2023 to carry out the independent examination of the Wickham Market Neighbourhood Development Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 15 February 2023.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding local character and allocating sites for new housing. The Plan has successfully identified a range of issues where it can add value to the strategic context already provided by the adopted Local Plan.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Wickham Market Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area and a parcel of land to the south in Pettistree parish.

**Andrew Ashcroft**  
**Independent Examiner**  
**28 June 2023**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Wickham Market Neighbourhood Development Plan 2018-2036 (the 'Plan').
- 1.2 The Plan has been submitted to East Suffolk Council (ESC) by Wickham Market Parish Council (WMPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) 2012 and its updates in 2018, 2019 and 2021. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether or not the submitted Plan meets the basic conditions and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as a result of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope. Any plan can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the development plan. It proposes two housing allocations and the designation of Local Green Spaces.
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the neighbourhood area and will form part of the wider development plan.

## **2 The Role of the Independent Examiner**

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by ESC, with the consent of WMPC, to conduct the examination of the Plan and to prepare this report. I am independent of both ESC and WMPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 35 years' experience in various local authorities at either Head of Planning or Service Director level. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral Service.

### *Examination Outcomes*

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted proceeds to a referendum; or
  - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
  - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Sections 7 and 8 of this report.

### *Other examination matters*

- 2.6 In examining the Plan I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
  - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
  - the Plan has been prepared for an area that has been designated by the relevant local planning authority and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements.

### 3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the Sustainability and SEA report. (July 2022)
- the SEA Scoping Report.
- the SEA non-technical summary.
- the ESC HRA screening report (October 2021).
- the Heritage and Character Assessment (February 2017)
- the Housing Needs Assessment (2017)
- the Site Assessment Report (February 2018)
- the Site Assessment Report (May 2023)
- the Local Green Spaces Assessment (May 2022)
- the Landscape Character Assessment (April 2018) (Parts 1-3)
- the Non-Designated Heritage Assets assessment (August 2022)
- WMPC's responses to the Clarification Note.
- the representations made to the Plan.
- the adopted Suffolk Coastal Plan 2018-2036.
- the National Planning Policy Framework (July 2021).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 15 February 2023. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. My visit is covered in more detail in paragraphs 5.9 to 5.12 of this report.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted Plan, I was satisfied that the Plan could be examined without the need for a public hearing.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, WMPC has prepared a Consultation Statement. The Statement is extensive in the way it sets out the mechanisms used to engage all concerned in the plan-making process. It includes an assessment of the consultation undertaken during the various stages of Plan production. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (February to April 2019). It sets out the key issues in a proportionate way and is then supported by various appendices. An otherwise matter-of-fact document is brought to life with the inclusion of several of the consultation documents.
- 4.3 Appendix 10 of the Statement sets out details of the range of consultation events that were carried out in relation to the initial stages of the Plan. They included:
- the ongoing use of a dedicated website;
  - the distribution of leaflets throughout the parish; and
  - the various use of Open Days.
- 4.4 The Statement also provides details of the way in which WMPC engaged with statutory bodies. I am satisfied that the process has been both proportionate and robust.
- 4.5 Appendix 9 of the Statement also provides specific details on the comments received as part of the consultation process on the pre-submission version of the Plan and how WMPC responded to those comments and the changes that worked their way through into the submission version of the Plan. This process helps to describe the evolution of the Plan.
- 4.6 Consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation.
- 4.7 From all the evidence provided to me as part of the examination, I am satisfied that WMPC has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. ESC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

## *Representations*

4.8 Consultation on the submitted Plan was undertaken by ESC. It ended on 21 December 2022. This exercise generated comments from a range of organisations as follows:

- Anglian Water
- Berlain Limited
- Colin Carter (Artisan PPS Ltd)
- East Suffolk Council
- East Suffolk Internal Drainage Board
- Historic England
- National Grid
- Natural England
- Suffolk County Council
- Suffolk Fire and Rescue Service
- Suffolk Wildlife Trust
- Ufford Parish Council

4.9 Representations were also received from six residents.

4.10 Additional consultation was undertaken in May 2023 on a correction to the Site Assessment Report. It generated comments from the following organisations:

- Berlain Limited
- ES Water Management Board
- Michael Hughes
- Natural England

4.10 I have taken account of the various representation in examining the Plan. Where it is appropriate to do so, I comment on the various representations on a policy-by-policy basis in Section 7 of this report.

## 5 The Neighbourhood Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The neighbourhood area consists of the parish of Wickham Market. Its population in 2011 was 2156 persons living in 1006 houses. It was designated as a neighbourhood area on 12 January 2016.
- 5.2 The neighbourhood area is located to the immediate west of the A12, approximately 15 miles to the north-east of Ipswich.
- 5.3 Wickham Market is an attractive village which provides retail, commercial and community services both to the village and to its wider hinterland. Its historic core is a designated conservation area. The village is based around High Street and the Market Square. All Saints Church dominates the local environment. New residential development is taking place to the south of the village (between High Street and Chapel Lane). The remainder of the parish is attractive open countryside.

### *Development Plan Context*

- 5.4 The development plan covering the neighbourhood plan area is the Suffolk Coastal Local Plan 2018-2036 and the Suffolk Minerals and Waste Local Plan. The Suffolk Coastal Local Plan sets out a vision, objectives, a spatial strategy, and overarching planning policies that guide new development in the Plan period. It was adopted in September 2020.
- 5.5 The Local Plan includes a comprehensive range of policies. Policy SCLP3.2 identifies Wickham Market as a Large Village. Table 3.4 summarises the policy approach for such villages as follows:
- Development within existing Employment Areas (Policy SCLP4.1)
  - Development of employment uses appropriate to the scale of the settlement (Policy SCLP4.2 and Policy SCLP4.5)
  - Retail uses within defined District Centres (Policy SCLP4.8)
  - Protection of local shops (Policy SCLP4.12)
  - New housing allocations (Section 12) New housing development and infill within Settlement Boundaries (Policy SCLP5.1)
- 5.6 Policy SCLP 12.1 comments about the interplay between the Local Plan and neighbourhood plans. It identifies an indicative housing requirement of a minimum of 70 homes for Wickham Market. The policy indicates that this figure is in addition to the Local Plan allocation in Pettistree (SCLP 12.60) for 150 homes which is located to the immediate south of the neighbourhood area.
- 5.7 Section 12 of the Local Plan proposes a series of housing and employment allocations in the context of detailed Area Strategies. They include:



- SCLP 12.41 Riverside Industrial Estate, Border Cot Lane, Wickham Market (employment allocation); and
- SCLP 12.60 Land between High Street and Chapel Lane, Pettistree (adjacent to Wickham Market) (residential allocation).

5.8 The submitted Plan has been prepared within its wider adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in East Suffolk. This is good practice and reflects key elements in Planning Practice Guidance on this matter. It is also clear that the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

#### *Unaccompanied Visit*

- 5.9 I visited the neighbourhood area on 15 February 2023.
- 5.10 I drove into Wickham Market via the A12 from the south. This gave me an initial impression of the setting and the character of the neighbourhood area. It also highlighted its connection to the strategic road system.
- 5.11 I looked initially at the village centre. I saw the importance of the shops to the local community, including the supermarket to the immediate south of the village centre. I saw its historic character and the significance of All Saints Church both in the village and in the wider landscape.
- 5.12 I then spent time looking at specific elements within the submitted Plan including the proposed Local Green Spaces, the proposed housing sites off Old School Farm and Simon's Cross and the identified key views. In looking at the proposed Old School Farm site I saw the development of new homes to the immediate south of the village. The visit highlighted the compact nature of the village and the opportunity for residents to access services in a sustainable fashion.

## 6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. It is also proportionate to the Plan itself.
- 6.2 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
  - contribute to the achievement of sustainable development;
  - be in general conformity with the strategic policies of the development plan in the area;
  - be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations; and
  - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.
- 6.3 I assess the Plan against the basic conditions under the following headings.
- National Planning Policies and Guidance*
- 6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) as most recently updated in July 2021. This approach is reflected in the submitted Basic Conditions Statement.
- 6.5 The NPPF sets out a range of core land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Wickham Market Neighbourhood Plan:
- a plan led system– in this case the relationship between the neighbourhood plan and the adopted Suffolk Coastal Local Plan 2018-2036;
  - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
  - taking account of the different roles and characters of different areas;
  - always seeking to secure high quality design and good standards of amenity for all future occupants of land and buildings; and
  - conserving heritage assets in a manner appropriate to their significance.
- 6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.7 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the plan area within the context of its role in the settlement hierarchy. It includes a series of policies that allocate land for housing development, seek to safeguard the quality and nature of its historic environment, and propose the designation of local green spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance in March 2014. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

*Contributing to sustainable development*

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. The submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for the allocation of land for housing development (Policies WICK 12 and 13). In the social role, it includes a policy on local green spaces (Policy WICK 6). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has specific policies on landscape character (Policy WICK 2), on key views (Policy WICK3) and on heritage assets (Policy WICK 8). WMPC has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

*General conformity with the strategic policies in the development plan*

- 6.12 I have already commented in detail on the development plan context in East Suffolk in paragraphs 5.4 to 5.8 of this report.

- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the recommended modifications in Section 7 of this report I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

*Strategic Environmental Assessment*

- 6.14 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement WMPC prepared a Sustainability Report incorporating Strategic Environmental Assessment (SEA) for the Plan. The report is thorough and well-constructed. The Assessment assesses each policy against local sustainability objectives. It also assesses a series of options for new growth in the parish.
- 6.16 The assessment of sites section (paragraphs 5.20 to 5.24) comments that:

*'The process of site selection involved a comprehensive approach of site identification and assessment. Possible sites for development were gleaned from the following sources: the SCDC Strategic Housing Land Availability Assessment (SHLAA) process; the SCDC Strategic Housing and Economic Land Availability Assessment (SHELAA) process (which superseded the SHLAA); and sites suggested by Wickham Market Parish Council, which include parcels of land identified from the Wickham Market Neighbourhood Plan Landscape Sensitivity Assessment (2017)*

*In total 22 sites were submitted and assessed. The way the sites were assessed and the outcomes of the assessment are presented in the Wickham Market Neighbourhood Plan Site Assessment Report 2018 (prepared by AECOM)*

*The results of the site assessment process were that, of the 22 sites, 18 sites were given a 'red' rating, 2 sites an 'amber' rating and 2 sites a 'green' rating. The 'red' rated sites were not considered to represent reasonable alternatives.*

*The two sites with a 'green' rating were considered clearly appropriate for development. These were: site 5b/6: Land west of Old School Farm, High Street and site 27: Simon's Cross Allotments*

*A further two sites were given an 'amber' rating and therefore could potentially be reasonable alternatives: site 1b: Land adjacent to British Telecom Telephone Exchange and site 18: Land opposite the Post Office, High Street.'*

- 6.17 In the round I am satisfied that the approach taken is comprehensive and meets the basic conditions. The environmental assessment of the policies is very thorough. The assessment of reasonable alternatives is equally thorough. In addition, it takes account of early work undertaken on the assessment of a range of potential sites. I comment on its findings in greater detail in Section 7 of this report.

### *Habitats Regulations Assessment*

- 6.18 ESC produced a separate Habitats Regulations Assessment (HRA) of the Plan. The HRA report is very thorough and comprehensive. It takes appropriate account of an extensive range of protected sites (as set out in Table 1). The Assessment reaches the following conclusions:

*‘The Wickham Market Neighbourhood Plan will provide policies which will be used for determining planning applications alongside the East Suffolk Council Suffolk Coastal Local Plan, 2020. It includes locally specific criteria-based policies to be used for the determination of planning applications. The Plan also includes two allocations for new residential development (up to 110 dwellings).*

*The Neighbourhood Plan is being prepared to be in general conformity with the relevant policies in the East Suffolk Council- Suffolk Coastal Local Plan, September 2020.*

*Policies WICK1, WICK12 and WICK13 of the Wickham Market Neighbourhood Plan were identified through the HRA screening process as having a potential likely significant effect on protected Habitat Sites as the result of increased recreational disturbance. However, as confirmed by the conclusions of the Suffolk Coastal Local Plan HRA, The Suffolk Coast RAMS is considered to provide adequate measures to mitigate any impacts arising from planned housing growth. In addition, policy WICK12 includes sufficient references to the need to secure additional green infrastructure to ensure the mitigation of any likely significant effects arising as the result of that development alone.*

*The Wickham Market Neighbourhood plan includes adequate reference to the requirements of the Suffolk Coast RAMS and additional green infrastructure requirements and therefore it is concluded that the Wickham Market Neighbourhood Plan will not lead to any adverse effects on protected Habitat Sites.’*

- 6.19 The process followed provides assurance to all concerned that the submitted Plan takes appropriate account of important ecological and biodiversity matters. Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan obligations.

### *Human Rights*

- 6.20 In a similar fashion, I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

### *Summary*

- 6.21 On the basis of my assessment of the Plan in this section of my report, I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and WMPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (41-004-20190509) which indicates that neighbourhood plans must address the development and use of land. It does however include a series of well-developed non-land use Community Actions.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. Where necessary, I have identified the inter-relationships between the policies. It addresses the Community Actions after the policies.
- 7.6 For clarity this section of the report comments on all the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

### *The initial section of the Plan (Sections 1-3)*

- 7.8 The introductory parts of the Plan set the scene for the range of policies. They do so in a proportionate way. The Plan is presented in a professional way. It makes a very effective use of well-selected charts and maps. In combination they ensure that the Plan is easy to navigate and attractive to use. A very clear distinction is made between its policies and the supporting text. If the Plan is 'made' it will sit comfortably and professionally as part of the development plan for East Suffolk.
- 7.9 The Introduction is well-considered. It identifies the way in which a neighbourhood plan complements the existing development plan. Paragraph 1.1 properly identifies the Plan period. The neighbourhood area is shown on Figure 1.1.
- 7.10 Section 2 provides information about the neighbourhood area and its history. It provides interesting and comprehensive details which help to set the scene for the eventual policies. It neatly relates the history of the parish to the issues which the Plan addresses. The section on 'Wickham Market today' helpfully sets the scene for some of the resulting policies.

- 7.11 Section 3 sets out the vision, and objectives for the Plan. There are seven related themes in the Vision. The relationship between the Vision and the objectives is shown in Table 3.1 to good effect.
- 7.12 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

#### Policy WICK1 Development Strategy and Principles

- 7.13 As the title suggests, this policy sets out a wider strategy for the Plan. It includes the following principles:
- new development is focused in the settlement boundary;
  - new developments will be supported on land at the Old School House (Policy WICK12) and at Simons Cross (Policy WICK13);
  - guidance on the mix of new homes; and
  - a series of other matters including infrastructure provision and good design.
- 7.14 The policy has attracted objections from Colin Carter (Artisan PPS Ltd) insofar as it comments about the two proposed housing allocations in the Plan. I address this matter later in this report both generally (paragraphs 7.53 to 7.68) and in relation to the two proposed housing allocations (paragraphs 7.69 to 7.81).
- 7.15 In the round I am satisfied that the policy takes a positive approach to the location and nature of new development in the parish. The concentration of new development adjacent to the village will assist in the promotion of sustainable development by focusing new development close to existing commercial and community facilities.
- 7.16 Part C of the policy comments about Local Plan policies about housing mix. Whilst this is appropriate, I recommend the deletion of the explanatory text within this part of the policy and its repositioning into the supporting text.
- 7.17 I am satisfied that the series of issues addressed in Part D of the policy are important and distinctive matters. Nevertheless, I recommend that this part of the policy is applied on a proportionate basis. Plainly individual proposals will present their own opportunities to deliver the matters listed.
- 7.18 Finally I recommend that certain elements of the supporting text are modified to bring the clarity required by the NPPF and to remove unnecessary speculative comments. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

**In Part C delete the final sentence.**

**Replace the opening element of Part D with: ‘As appropriate to their scale, nature and location, development proposals should address the following matters:’**



*Replace the final three sentences of paragraph 4.2 with: ‘The Local Plan has extended the settlement boundary of Wickham Market to include the allocated site (SCLP 12.60) in Pettistree parish. Planning permission was granted for the development of the site in January 2021.’*

*At the end of paragraph 4.3 add: ‘These matters are addressed in Part C of Policy WICK1. The Parish Council fully support the Local Plan where it proposes that, for proposals of 10 units or more, at least 50% of the dwellings will need to meet the requirements for accessible and adaptable dwellings under Part M4 (2) of the Building Regulations.’*

#### Policy WICK2 Local Landscape Character

7.19 This is a detailed policy which is underpinned by a series of landscape studies (including the Suffolk Coastal Landscape Character Assessment and the Landscape Character Assessment produced for the neighbourhood plan). The key tenet of the policy is that proposals for development must demonstrate how they have been informed by the special qualities and features in the Wickham Market Landscape Character Assessment (including, where relevant, the mitigation measures identified in the Wickham Market Landscape Sensitivity Assessment 2018). Other elements of the policy set out specific requirements.

7.20 The policy takes a comprehensive approach to this matter. Paragraph 5.1 of the Plan explains the context as follows:

*‘Whilst Wickham Market is not in any statutorily designated landscape, the northern and eastern parts of the parish were within the Suffolk Coastal Special Landscape Area (SLA). SLAs were designations contained in Policy SSP38 of the Site Allocations and Area Specific Policies DPD (2017). The Local Plan has removed this designation and relies on the landscape character assessment approach. The Neighbourhood Plan has been informed by a specific Landscape Character Assessment; this identifies the landscape character types shown in Figure 5.1. The Suffolk Coastal Landscape Character Assessment has also been used to inform the Neighbourhood Plan.’*

7.21 In general terms, I am satisfied that the policy meets the basic conditions. I recommend a series of modification to ensure that the wording used in the policy has the clarity required by the NPPF. In part B I also recommend that the policy acknowledges that suggested enhancements may not always be practicable. The policy will contribute to the delivery of the environmental dimension of sustainable development.

**In part A replace ‘must’ with ‘should’**

**In part B replace ‘will be expected to’ with ‘should’ and ‘enhance’ with ‘where practicable, enhance’**

**In part C replace ‘will be expected to’ with ‘should’**

**In part D replace ‘Proposals’ with ‘Proposals for Development’**

## Policy WICK3 Key Local Views

- 7.22 This policy has two related elements. The first comments about a series of key views (and as identified on the policies maps). The second comments about the way in which development proposals should seek to respond to the identified views. The policy is informed and underpinned by the Wickham Market Landscape Character Assessment (2018).
- 7.23 Paragraph 5.8 of the Plan comments that the Wickham Market Landscape Assessment document identified several key views both into and out of the parish. It also comments about the importance of new development considering key views and being informed by the Part 2 of the Landscape Character Assessment – the Key Views Assessment.
- 7.24 The Plan acknowledges that views do not respect administrative boundaries. Paragraph 5.7 comments that the Plan will not form part of the development plan in neighbouring parishes. However, where development proposals in neighbouring parishes are likely to impact on views from Wickham Market parish, it comments that developers will be encouraged to demonstrate how the requirements of Part A of policy WICK3 are met. It also comments that WMPC will work with other parishes and the LPA to encourage suitable design and mitigation. This is a very practical and collaborative approach.
- 7.25 I looked carefully at a selection of key views during the visit. I paid particular attention to those view which may be affected by the development of the two proposed housing allocations in the Plan. Views 11 and 12 overlap with the proposed allocation of land at the Old School (WICK12).
- 7.26 In principle there is no reason why the development of housing allocations cannot accommodate and/or safeguard an identified key view. In this context paragraph 4 of the Key View Assessment (2018) comments:
- ‘The viewpoints selected are mapped on the following page. They are representative of the general location of a key view, and might represent one of a sequence of views experienced along a route, rather than a single point. This selection excludes points within the village core and focuses on the area outside the village envelope and the parcels of land that enclose it. This will allow policy making, relating to expansion of the village, to take account of key views when considering the impact that new development might have in any given location. It can be used to help make a judgement about how a proposed development or change in land use will alter views and, consequently, whether this change is likely to be acceptable.’*
- 7.27 I have considered the relationship between the identified views and the proposed allocation of land at the Old School Farm (WICK12) very carefully. On the balance of the evidence, I recommend that key views 11 and 12 are deleted from the policy. In reaching this conclusion I have noted that the Key Views Assessment does not provide any direct evidence or commentary about the relationship between the two issues.
- 7.28 Other than on this specific matter, the policy takes a positive approach to this important matter. It is impressively underpinned by the Key Views Assessment. However, in

order to bring the clarity required by the NPPF, I recommend that the policy is recast so that it sets out the specific requirements for developers on this matter. I also recommend that the policy sets out the implications of proposals which would have an unacceptable impact on an identified key view. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

**Replace the policy with:**

**‘The scale, form and design of development proposals should protect and, where practicable, enhance key local views as identified on the Policies Map. This process should be informed by the Wickham Market Landscape Character Assessment Part 2 (2018) - Key Views.**

**Development proposals which would have an unacceptable impact on an identified key local view will not be supported.’**

*Delete Views 11 and 12 from Policy Map 10.1 and 10.2*

Policy WICK4 Wildlife in New Development

- 7.29 As the title suggests, this policy comments about the way development proposals should safeguard and incorporate wildlife. The first part has a general effect and requires development proposals to include design features which will protect and enhance the ability of wildlife to thrive. The second and third parts of the policy refer to sustainable drainage.
- 7.30 The policy has received a level of support from the representations. The Suffolk Wildlife Trusts suggests that the policy should go further in its pursuit of safeguarding biodiversity. Such an approach would have been possible. However, it is not needed to ensure that the Plan meets the basic conditions.
- 7.31 In a more general sense, I recommend modifications to ensure that the policy meets the basic conditions. In both parts A and B this involves the introduction of a proportionate element to the policy. As submitted the policy would apply to all proposals. I also recommend a specific modification to the first part of the policy to remove the rather loose reference to minimising the effect of new development on biodiversity. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

**At the beginning of part A of the policy add: ‘As appropriate to their scale, nature and location,’**

**In part A of the policy replace the second sentence with: ‘Development proposals should provide net gains for biodiversity.’**

**Replace part B of the policy with: ‘New housing development should incorporate on-site sustainable drainage systems (SuDS) wherever technically feasible. Wherever practicable, and as appropriate to their scale, nature and location, new**

**housing development should also incorporate a wide range of creative SuDS solutions including the provision of SuDS as part of green spaces, green roofs, permeable surfaces, and rain gardens.'**

Policy WICK5 Renewable Energy and Carbon Reduction

- 7.32 This policy has three related parts. The first comments about water efficiency. The second comments about the relationship of site layouts to sunlight and solar gain. The third comments about car parking and electric vehicle charging points.
- 7.33 The policy takes a positive and non-prescriptive approach to these important matters. I have taken account of the representation from Anglian Water. On the balance of the evidence, I am satisfied that the policy and the supporting text take a balanced approach to water efficiency. Whilst the costs of water efficiency measures are unlikely to be significant to the overall viability of new development, it is important that the policy acknowledges that this may be the case in certain circumstances.
- 7.34 I recommend detailed modifications to the policy to bring the clarity required by the NPPF and to assist in its consistent application by ESC through the process. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

**In part A delete the unnecessary colon.**

**Replace part B of the policy with: 'The layout and design of new housing development should be configured to secure the optimum use natural sunlight and solar gain including enabling the provision of solar energy generation measures.'**

Policy WICK6 Local Green Spaces

- 7.35 This policy proposes the designation of eleven local green spaces (LGSs). I looked at the proposed LGSs carefully during the visit.
- 7.36 The LGS Assessment provides comprehensive information on the eleven green spaces. The concentrations of LGS around the Church and the Playing Fields provide very valuable areas of green space in very close proximity to the community.
- 7.37 Based on all the information available to me, including my own observations, I am satisfied that they comfortably comply with the three tests in paragraph 102 of the NPPF.
- 7.38 I am also satisfied that the proposed designation of the LGSs would accord with the more general elements of paragraph 101 of the NPPF. Firstly, I am satisfied that their designation is consistent with the local planning of sustainable development. They do not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period.

Indeed, they are an established element of the local environment and, in most cases, have existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the proposed local green spaces would not endure beyond the end of the Plan period.

- 7.39 The policy goes beyond the matter-of-fact approach in paragraph 103 of the NPPF. This is understandable given the range and nature of the proposed LGSs. Based on WMPC's responses to the clarification note, I recommend that the policy is modified so that it follows the format of paragraph 103 of the NPPF. In this context, elements of the submitted policy can be repositioned into the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

**Replace Part B of the policy with: 'Development proposals for local green spaces will only be supported in very special circumstances.'**

*At the end of paragraph 5.23 add: 'The policy takes on the matter-of-fact format of paragraph 103 of the NPPF. East Suffolk Council will be able to make its own assessment of the extent to which any development proposals are consistent with the designation of the various local green spaces. This may include any proposals for an ancillary feature to an identified local green space, and where it can be clearly demonstrated that it is required to support or enhance its role and function.'*

Policy WICK7 Wickham Market Conservation Area

- 7.40 This policy highlights the importance of trees to the Conservation Area. As the Plan comments The Wickham Market Conservation Area Appraisal (CAA) 2016 identifies several important open/green/treed spaces which are considered to contribute, in their undeveloped form to both the historic and visual character of the Conservation area. It specifically mentions the importance of numerous garden spaces forming the setting to many fine houses and groups of dwellings.
- 7.41 I recommend that the first and second elements of the policy are combined to ensure that it is policy-focused rather than a description of the importance of the green, open areas. I also recommend that the modified policy sets out requirements for developers rather than indicating what types of development will not be supported. This will ensure that the policy has a positive rather than a negative format. The recommended modification also involves the deletion of the final element of the policy (which does not bring additional value beyond the modified parts A and B of the policy and the wider context provided by national policy).
- 7.42 I also recommend a detailed modification to the wording used in the third part of the policy to bring the clarity required by the NPPF. Otherwise, it meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

**Replace parts A and B of the policy with:**

**‘Development proposals should respond positively to the important open, green and treed spaces within the Wickham Market Conservation Area which make a significant contribution to the character and appearance of the Conservation Area in their undeveloped form. Development proposals which would involve the loss of the open, green spaces or cause unacceptable harm to their character and appearance will not be supported.’**

**In part C of the policy replace ‘will need to’ with ‘should’**

**Delete part D of the policy.**

Policy WICK8 Non-Designated Heritage Assets

- 7.43 This policy identifies a series of non-designated heritage assets. It then sets out a policy approach to the assets. The proposed assets are listed in paragraph 6.12 of the Plan and detailed in the Non-Designated Heritage Assets document.
- 7.44 I am satisfied that the proposed assets have been carefully chosen. WMPC’s response to the clarification note explained its decision to include two woodlands in the schedule.
- 7.45 I recommend that the policy is recast so that it explicitly identifies the proposed assets and then applies the approach taken in paragraph 203 of the NPPF to the various assets. In this context, I recommend that the policy elements in the submitted Plan are repositioned into the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the environmental dimension of sustainable development.

**Replace the policy with:**

**‘The Plan identifies a series of non-designated heritage assets as follows: [add the assets listed in paragraph 6.12]**

**In determining development proposals that directly or indirectly affect non-designated heritage assets, a balanced judgement will be taken having regard to the scale of any harm or loss and the significance of the heritage asset.’**

*Combine paragraphs 6.11 and 6.12 (as 6.11). Thereafter add a replacement 6.12 to read:*

*‘The policy applies the national approach set out in paragraph 203 of the NPPF. Within this wider context proposals for the re-use of non-designated heritage asset structures will be supported if they are compatible with the significance of the asset, including its setting, and use appropriate materials and designs in any construction work. Applications should be accompanied by a heritage statement describing the significance of any heritage asset affected. The adaptive reuse of a non-designated heritage asset should not cause substantial harm to its physical structure or setting. Where substantial harm is unavoidable, it must be clearly and convincingly justified in the heritage statement. In considering proposals which involve the loss or alteration of*

*a non-designated heritage asset, the criteria set out in Local Plan Policy SCLP 11.6 will apply to built assets. In addition, for non-built features consideration will be given to the impact on the feature and how damage will be avoided.'*

#### Policy WICK9 Car Parking

- 7.46 This policy requires that development proposals provide car parking to the standards in the Suffolk County Council (SCC) Parking Standards 2019. Paragraph 7.4 of the Plan explains the context to the policy. It comments that:

*'Residential developments must be designed with adequate parking in order to prevent parking spilling over onto the public highway and pavements. The previous SCC parking guidance (2002) was written to try to encourage people to use public transport, but this has had a detrimental effect on rural communities that depend on the car as the primary means of transport. This point is made clearly in the foreword of the SCC Parking Guidance 2019. In reality, the coverage and frequency of public transport is generally insufficient to meet the needs of rural communities who continue to depend on the car as a primary means of transport. The Local Plan adopts the new guidance for all parking except those elements relating to Residential Parking Design, as set out in Local Plan Policy SCLP7.2. In this context the submitted Plan adopts the SCC Parking Guidance 2019 in full.'*

- 7.47 On the balance of the evidence, including WMPC's response to the clarification note I am satisfied that the policy brings an element of local distinctiveness to the approach already taken in the development plan (and by SCC in its capacity as the highways authority). However, to bring the clarity required by the NPPF, I recommended detailed modifications to the wording used in the policy. I also recommend that the policy acknowledges that there may be circumstances where the parking requirements may be impractical or where the transport requirements of the residents of the houses concerned can be met in an alternative fashion. Finally, I recommend consequential modifications to the supporting text. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environment dimensions of sustainable development.

#### **Replace the policy with:**

**'All residential development proposals should provide car parking to meet the standards in the 2019 Suffolk County Council Suffolk Parking Guidance. Development proposals which do not meet the relevant standards will only be supported where it can be demonstrated either that the standards are impracticable for the site concerned or that alternative arrangements are in place to address the transportation needs of the occupiers of the dwellings concerned.'**

*At the end of paragraph 7.4 add: 'The matter is addressed in Policy WICK9. It acknowledges that there may be circumstances where the parking requirements may be impractical or where the transport requirements of the residents of the houses*

*concerned can be satisfied in an alternative fashion. This is a matter which East Suffolk Council will be able to address on a case-by-case basis throughout the Plan period.'*

#### Policy WICK10 Pedestrian Safety

- 7.48 This policy identifies five locations in the parish where there is local concern about pedestrian safety. It then comments that development proposals should ensure that they do not have an unacceptable impact on safety in these parts of the parish.
- 7.49 I recommend that the opening element of the first part of the policy is recast so that it has the clarity required by the NPPF and can be applied by ESC on a consistent basis.
- 7.50 I have taken account of WMPC's response to the clarification note on part B of the policy. I recommend that this part of the policy is deleted and repositioned into expanded supporting text. This will provide greater clarity and a context within which WMPC can work with EDF as it prepares its proposals for the Sizewell C Park and Ride facility. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social dimension of sustainable development.

**Replace the opening component of part A of the policy with: 'Major development proposals (as defined in the NPPF) should demonstrate that they have been prepared constructively to ensure that the development does not have an unacceptable impact on pedestrian safety on the following sites.'**

#### **Delete part B of the policy.**

*At the end of paragraph 7.11 add: 'The Parish Council has been working with EDF on traffic calming measures to mitigate the impact of traffic arising as a result of Sizewell C's Southern Park & Ride car park planned just north of the village. The Plan seeks to take account of these works and to ensure that funding is secured for some mitigation measures which might include speed reduction to 20mph. Where it is considered necessary, and as identified by local traffic survey work, the provision of infrastructure improvements to enhance pedestrian safety should be secured via the necessary conditions and/or legal agreements.'*

#### Policy WICK11 Cycling, Walking and Disability Access

- 7.51 This is a comprehensive policy on cycling, walking and access. It comments that development proposals which would improve cycling, walking and access will be supported.
- 7.52 The policy takes a positive approach to this matter. I recommend detailed modifications to the various elements of the policy so that it can be applied on a consistent basis by ESC throughout the Plan period and to bring the clarity required by the NPPF. Clearly individual development proposals will present their own opportunities for such improvements. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social dimension of sustainable development.



**In part A of the policy replace the final sentence with: ‘Such routes should also incorporate access for disabled users and users of mobility scooters.’**

**At the beginning of Part B of the policy add: As appropriate to their scale, nature, and location,**

**In Part B replace ‘possible’ with ‘practicable’**

**In Part D replace ‘will’ with ‘would’**

The Proposed Allocations

7.53 The Plan proposes the allocation of two sites for housing purposes. The first is land at Old School Farm (Policy WICK12). The second is land at Simon’s Cross (Policy WICK13). This section of the report comments about matters common to their selection and the documents which have underpinned the process followed. Thereafter I address site-specific matters for the two sites under the two policy headings.

7.54 A variety of potential sites in the village were assessed by AECOM (on behalf of WMPC) in the Site Assessment Report (SAR) (February 2018). The SAR assessed 22 sites. Table 5.1 of the SAR summarises the findings on a consistent basis.

7.55 The SAR makes the following conclusions (in its Section 6.1):

*‘The site assessment has found that of the sites assessed there are two sites that would be appropriate for allocation in the neighbourhood plan, and which would meet the identified housing need. These are land to the West of Old School Farm (Site 499 in SCDC’s Issues and Options consultation or WMPC Land Parcel 5b and 6 + additional between the site and high street) and Simon’s Cross Allotments – (Land parcel 27) subject to the reprovizion of the allotments.*

*There are two other sites that are potentially suitable for development, if the identified issues were resolved. There are a number of other sites that may be suitable for other uses e.g. Local Green Space. The remainder of the sites being considered for housing are unsuitable for development and not appropriate for allocation in the Neighbourhood Plan.’*

7.56 The sites were also addressed in the Sustainability Report and SEA (SR/SEA) (July 2022). The SR/SEA summarises the earlier findings of the SAR. It then assesses reasonable alternative for housing development. The alternative sites tested were the same sites which were given an amber rating in the SAR 2018. Table 5.3 summarises the assessment of reasonable alternatives.

7.57 Representations received on the submitted Plan from the development industry comment about to the process followed and the selection of the two sites allocated in the Plan. The representations suggest that the following sites are allocated in the Plan instead of (or in addition to) WICK 12 and WICK13:

- Land at Dallinghoo Road;
- Land to the north of Border Cot Lane Industrial Estate;
- Land adjacent to the BT Telephone Exchange; and

- Land at Yew Tree Rise.

7.58 I comment on the general comments/objections and then the specific comments made about the two allocated sites. I do not comment on the four proposed alternative sites given that my role is to examine the submitted Plan against the basic conditions and not examine or propose an alternative Plan.

*Assessment of Housing Need*

7.59 The Local Plan provides clear advice for qualifying bodies preparing neighbourhood plans in Policy SCLP12.1 by providing minimum indicative housing totals for each affected parish. In the case of Wickham Market, the figure is 70 homes. Given that the Plan allocates two sites which together would deliver 110 homes in total, I am satisfied that the approach taken is both robust and appropriate.

7.60 In addition I am satisfied that this broader issue was properly assessed in SAR.

7.61 Plainly there is the possibility that the two sites will not deliver the homes required by 2036. I have addressed this matter in the section of this report on the monitoring and review of the Plan (paragraphs 7.84 to 7.85). In addition, Local Plan Policy SCLP 12.1 has its own delivery safeguards in respect of the collective delivery of housing.

7.62 In its representation on the Plan ESC comments that it is ‘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.’

*The process followed*

7.63 The selection of the allocations has arisen as a result of two related exercises. The first was the SAR (February 2018). It was prepared independently by AECOM (on behalf of WMPC). The second was the SR/SEA (July 2022). Plainly there is a gap between the two documents. The Local Plan was adopted in the intervening period (September 2020). Nevertheless, this process is not unusual in the preparation of a neighbourhood plan. In this case the Covid pandemic in 2020 and 2021 will have had inevitable consequences on the production of the Plan.

7.64 I have considered the representations on this matter very carefully. On the balance of the evidence, I am satisfied that a proportionate and evidence-based process has been followed. The SR/SEA naturally follows on from the SAR. In addition, there is a consistency between the two documents and their approaches. The SR/SEA assesses alternative site options. They are the sites which scored an amber rating in the SAR.

*Heritage issues.*

7.65 The representation from Colin Carter contends that there is an inconsistency between the SAR and the SR/SEA regarding heritage assets. As a matter of fact, the SAR was prepared before the Plan had been developed in any detail and the proposed non-designated heritage assets were identified. In the case of the proposed allocation at

Old School Farm (WICK12), the representation argues that the selection of the site has not been assessed in the context of the identification of the Old School as a non-designated heritage asset.

- 7.66 I have considered this matter very carefully. Based on all the evidence and information, I am satisfied that WMPC has taken a proportionate approach to this matter in the overall context of the evolution of the Plan. In relation to the proposed allocation at Old School Farm, I am satisfied that WMPC has taken this matter into account. The significance of the Old School is identified in criterion d of the policy and in the supporting text (paragraph 8.5). In any event, the identification of a non-designated heritage asset is an acknowledgement of the character of the Old School rather than a change in its circumstances or status.

#### *Key Views*

- 7.67 The representation from Colin Carter suggests that there is an inconsistency between the allocation of housing sites and the identification of key views in Policy WICK3. I looked at the views carefully during the visits.
- 7.68 I have concluded that there is an inconsistency between the allocation of the site at Land at Old School Farm and Views 11 and 12. This reflects the timing of the work on the Key Views Assessment which significantly pre-dated the detailed production of the policies in the Plan itself. I have already addressed this matter in greater detail in paragraphs 7.22 and 7.28 of this report. I have recommended the deletion of the two views to ensure the clarity required by the NPPF and the internal consistency of policies in the Plan. Whilst this matter was avoidable, I am satisfied that it does not detract from the overall way in which the Plan meets the basic conditions. As with all plans, a balance needs to be struck between competing issues and priorities. In this case, I saw nothing which was so fundamental about the two views to outweigh the wider economic and social benefits of promoting new housing development on the Old School Farm site as proposed in the Plan.

#### *Policy WICK12 Land at Old School Farm*

- 7.69 This policy allocates land at and adjacent to Old School Farm for residential development (85 homes). The western part of the site is currently occupied by the buildings at Old School Farm and the former school (now an antiques centre). The eastern part of the site is in agricultural use. Vehicular access is proposed off Main Street (B1438). The allocation is underpinned by the findings of the SAR.
- 7.70 The policy sets out a series of criteria for the development of the site. They include the following matters:
- the delivery a mix of housing to respond to Policy WICK1;
  - the provision of related footpath and cycle links;
  - safeguarding the Old School; and
  - securing sensitive design along the southern boundary of the site to safeguard the setting of the cemetery.

- 7.71 I looked at the site carefully during the visit. Taking account of all the evidence, I am satisfied that the development of the site can be accommodated in the wider environment of the village in a satisfactory way. In particular, I am satisfied that the site is well-related to the village and has the potential to create appropriate linkages to surrounding land uses. I am also satisfied that with careful design the development of the site can respect the Cemetery to the south. This is captured in a criterion in the policy.
- 7.72 A representation has suggested that there may be title and restrictive covenant issues which may prevent the site coming forward. I have taken account of this issue. However, it is not unusual that allocated sites will need to resolve legal and commercial matters. Given that the Plan period is up to 2036 there is adequate time for any such issues to be resolved. Nevertheless, I have recommended that progress on the delivery of new homes is monitored and that, if necessary, a review of the Plan is undertaken if it becomes clear that the strategic allocation for Wickham Market in the Local Plan will not be achieved through the lack of delivery of either of the allocated sites.
- 7.73 I recommend modifications to criterion d. to bring the clarity required by the NPPF. The priority is to retain the Old School, and incorporate it sensitively into the wider development of the site. In these circumstances, a wide range of uses may be appropriate for its longer-term use and will assist in securing on-going maintenance and repair if this important building.
- 7.74 The final criterion requires archaeological investigations by way of a condition on planning applications. In principle I am satisfied that such an approach is appropriate, although it will be a matter for ESC to determine as part of its exercise of the development management process. However, in the round this is a process matter rather than a policy. As such I recommend that the criterion is deleted from the policy and addressed in expanded supporting text.
- 7.75 Otherwise the policy meets the basic conditions. The proposed delivery of 85 homes will contribute to the delivery of the social and the economic dimensions of sustainable development. In addition, its development will be consistent with the national policy drive to boost the supply of housing land (paragraph 60 of the NPPF).

**Replace d. with: ‘The Old School Building should be retained and incorporated sensitively into the layout of the site. The layout should ensure that the building has appropriate parking provision for its intended use.’**

**Delete criterion j.**

*At the end of paragraph 8.5 add: ‘Investigation using geophysical survey to inform the evaluation of any archaeological potential on the site prior to determination of planning applications on the site will be required.’*

Policy WICK13 Land at Simon's Cross

- 7.76 This policy allocates land at Simon's Cross for residential development (25 homes). The site is currently grassland and play space. It was formerly used as allotments. The allocation is underpinned by the findings of the SAR. SCC Highways advise that access to the site from the B1078 is not suitable and will need to be provided from the existing estate roads.
- 7.77 The policy sets out a series of criteria for the development of the site. They include the following matters:
- the delivery of a mix of housing to respond to Policy WICK1;
  - the provision of access from Simon's Cross; and
  - the delivery of pedestrian and cycle access connections.
- 7.78 I looked at the site carefully during the visit. Taking account of all the evidence, I am satisfied that the development of the site can be accommodated in the environment of the village in a satisfactory way. I am satisfied that the site is well-related to the village and could create appropriate linkages to surrounding land uses. I am also satisfied that with careful design the development of the site can secure safe access from Simon's Cross which respects the bridleway which runs in a north to south direction along the eastern boundary of the site. This is captured in criteria c and d.
- 7.79 I recommend modifications to the policy so that it incorporates an additional criterion to ensure that the development of the site is designed in a way which respects the amenities of the residential properties to the immediate east (in Simon's Cross).
- 7.80 The final criterion requires archaeological investigations by way of a condition on planning applications. In principle I am satisfied that such an approach is appropriate, although it will be a matter for ESC to determine as part of its exercise of the development management process. However, in the round this is a process matter rather than a policy. As such I recommend that the criterion is deleted from the policy. The matter is already addressed in paragraph 8.15 of the supporting text.
- 7.81 Otherwise the policy meets the basic conditions. The proposed delivery of 25 homes will contribute to the delivery of the social and the economic dimensions of sustainable development. In addition, its development will be consistent with the national policy drive to boost the supply of housing land (paragraph 60 of the NPPF).

**Add a new criterion after d. to read: 'The layout of the site should respect the amenities of the existing houses to the immediate east in Simon's Cross.'**

**Revise the letters used for the criteria thereafter.**

**Delete criterion h (on archaeology).**

## Community Actions

- 7.82 Section 9.1 of the Plan identifies a series of Community Actions. They are non-land use matters which have naturally arisen as the Plan was being prepared. They are set out in a separate part of the Plan to take account of national guidance on this matter.
- 7.83 I am satisfied that the Actions are both appropriate and distinctive to the parish. In some cases, they will complement some of the policies.

## Monitoring and Review of the Plan

- 7.84 Paragraph 1.12 comments about the way in which WMPC would monitor the effectiveness of the Plan. In the same way in which there is no requirement for a parish council to prepare a neighbourhood plan, there is no requirement for a parish council to review a 'made' neighbourhood plan. Nevertheless, it is best practice to ensure that the Plan responds to the success or otherwise of its policies and/or responds to broader changes in the development plan (such as the adoption of a new local plan).
- 7.85 In this context I recommend that the Introduction is expanded to highlight that WMPC will consider the need for a full or a partial review of any made neighbourhood plan to take account of two circumstances. The first would be where the development of the allocated sites did not proceed (and therefore the village would not deliver its strategic housing requirement). The second would be if ESC were to adopt a new/updated local plan which would replace the existing Local Plan. I recommend a consequential modification to the heading in the Introduction of the Plan.

*Add a new paragraph in the Plan (1.13) to read: 'As part of the monitoring process the Parish Council will pay particular attention to two matters. The first would be where the development of the allocated sites did not proceed (and therefore the village would not deliver its strategic housing requirement). The second would be if East Suffolk Council was to adopt a new Local Plan. Should either of these circumstances arise, the Parish Council will consider the need or otherwise for a partial or a full review of the Plan.'*

*Change the title of 'Monitoring the Plan' to 'Monitoring and Potential Review of the Plan.'*

## Other matters - General

- 7.86 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly as a result of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan as a result of the recommended modifications to the policies. These may include natural updates to the Plan based on the stage which it has now reached (for the referendum version) and for the made version (if the community supports the Plan at referendum). It will be appropriate for ESC and WMPC

to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies.*

Other Matters – Specific

- 7.87 ESC has made a series of helpful comments on the general elements of the Plan. Based on these comments, I set out below a series of very specific modifications that are necessary to ensure that the Plan meets the basic conditions.

*Section 2 – include a reference to the proposed park and ride facility for the construction phase of Sizewell C as part of the narrative of ‘Wickham Market today’*

*Paragraph 5.5 - delete ‘draft’*

*Paragraph 6.6 – refer to the policies in capital letters (to reflect their presentation elsewhere in the Plan)*

*Page 32/33 – revise paragraph numbering*

*Replace paragraphs 8.9 and 8.14 with: ‘The site falls within the Anglian Water Source Protection Zones 1, 2 and 3. Insofar as the land concerned may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with planning applications to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model, and initial assessment of risk), and provide assurance that the risk to the water environment has been fully understood and can be addressed through appropriate measures.’*

## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2036. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community. The Plan responds positively to the delivery of new homes in the parish. It also includes policies to safeguard local green spaces and its historic environment.
- 8.2 Following the examination of the Plan, I have concluded that the Wickham Market Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

### *Conclusion*

- 8.3 On the basis of the findings in this report I recommend to East Suffolk Council that subject to the incorporation of the modifications set out in this report, the Wickham Market Neighbourhood Development Plan should proceed to referendum.

### *Referendum Area*

- 8.4 I am required to consider whether the referendum area should be extended beyond the Plan area. I have considered this matter carefully and taken account of my observations during the visit. I recommend that the Plan should proceed to referendum based on the neighbourhood area as designated on 12 January 2016 and the houses on the Wickham Gate development to the immediate south of the neighbourhood area in Pettistree parish. This is the site allocated for residential purposes in the Local Plan (Policy SCLP12.60). The association of this site with Wickham Market is acknowledged by the recent boundary reviews in ESC.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner.

**Andrew Ashcroft**  
**Independent Examiner**  
**28 June 2023**