

Mid Suffolk District Council



Wetheringsett cum Brockford NP 2022 - 2037

Reg 16 Submission consultation responses

On February 2024, Wetheringsett cum Brockford Parish Council (the 'qualifying body') submitted a new Neighbourhood Development Plan to Mid Suffolk District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 18 March until Friday 3 May 2024.

Twelve representations were received in total. The respondents are listed below and copies of their representations are attached.

The Parish Council were also given an opportunity to respond to any new issues raised by the consultees listed below. Their response is also included at the end of this document.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Mid Suffolk District Council
(3)	Mendlesham Parish Council
(4)	Natural England
(5)	Suffolk Wildlife Trust
(6)	Historic England
(7)	Environment Agency
(8)	Anglian Water
(9)	National Landscape Team (<i>Dedham Vale and Suffolk Coast & Heaths</i>)
(10)	National Highways
(11)	Evolution Town Planning Ltd (obo D I Alston Will Trust)
(12)	Evolution Town Planning Ltd (obo Mr Ribbons)
(13)	Response from Wetheringsett cum Brockford Parish Council

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(1) SUFFOLK COUNTY COUNCIL

Date: 03 May 2024
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: neighbourhoodplanning@suffolk.gov.uk



Mid Suffolk District Council
Endeavour House,
8 Russell Road,
Ipswich
IP1 2BX

Dear Mr Bryant,

Submission Consultation version of the Wetheringsett Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Wetheringsett 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 welcome that reference to Suffolk Guidance for Parking has been included in Policy WCB6: Design, as we had previously recommended. However please note that this document has since undergone an update, and therefore the policy should be updated to reflect this.

The Suffolk Guidance for Parking (2023) can be found here: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>

SCC has no further comments to make on this plan.

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague
Senior Planning Officer (Growth)
Growth, Highways, and Infrastructure

(2) MID SUFFOLK DISTRICT COUNCIL

Our ref: Wetheringsett NP R16 response

Dated: 3 May 2024

From: Planning Policy Team, Mid Suffolk District Council

To: Janet Cheesley (Independent Examiner)
cc: Robert Townshend (Chairman, NP Steering Group), and
Andrea Long (NP Consultant)

Dear Janet, (All)

1. Reg 16 submission draft Wetheringsett cum Brockford N'hood Plan 2022 - 2037 2. Representation from Mid Suffolk District Council

This response is made for and on behalf of Robert Hobbs, Corporate Manager for Strategic Planning.

The Parish Council consulted us on their Regulation 14 pre-submission draft Plan (the 'WCBNP') in late 2023. Of relevance at that time was our adoption, just as their consultation was ending, of the Babergh & Mid Suffolk Joint Local Plan (Part 1). In our response, we suggested several ways in which the submission draft plan could be updated to ensure that it had regard to our new planning policy document. We are pleased to see that those suggestions have been taken on-board. We also saw, in December 2023, publication of the new National Planning Policy Framework (NPPF) which has also been picked up in the submission draft plan.

We do have some comments to make but consider that, where other changes are proposed, these are largely minor matters and that they could be dealt with accordingly. Of note, we would like to draw attention to our thoughts re policy WCB10.

We trust that our comments are helpful and would be happy to answer any questions.

Yours sincerely

Paul Bryant

Neighbourhood Planning Officer | Planning & Building Control

Babergh & Mid Suffolk District Councils – Working Together

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www.babergh.gov.uk / www.midsuffolk.gov.uk

Comments from Mid Suffolk District Council on the 2nd Submission draft Wetheringsett and Brockford Neighbourhood Plan

Chapter 1. Introduction

Para 1.9 - Minor modification. In the last sentence, delete the word '*emerging*' before 'Babergh and Mid Suffolk Joint Local Plan'.

Para 1.28 - Minor modification. At the end of the last sentence, amend the text to read 'Part 2'

Para 1.29 - Minor modification. To correct a spelling mistake of our making in our Reg 14 response, the first word on the second line should read 'totaling'.

Chapter 2. 'The Parish'

Updates noted. We have no other comments to make on this chapter.

Chapter 3. Plan preparation

Updates noted. We have no other comments to make on this chapter.

Chapter 4. Vision and objectives

We have no comments to make on this chapter.

Chapter 5: Housing & Economic Development

Updates noted. We have no other comments to make on this chapter.

Chapter 6: Design and the Historic Environment

In our Reg 14 response we made some suggestions re the positioning of the policy WCB8 text box, its associated supporting text, and what were Figures 12 to 16. In the submission draft plan, we see that the policy WCB7 text box now follows on from para 6.33, we then see Figures 14 to 18, and finally, policy WCB8 text box.

As a presentational matter only, we think it would be helpful in the final version of this part if this part could be presented as follows: para 6.30, Policy WCB7, paras 6.31 to 6.33 (with the NdHA sub-heading), Policy WCB8, and then Figures 14 to 18. Looking at the relevant pages (61 to 65) there appears to be sufficient space to accommodate this order.

Chapter 7: Natural Environment

Footnote 19 (pg 67) - Minor modification. The hyperlink only takes readers to our 'Current Evidence' webpage, from where they would need to search the listings to find the Joint BMSDC Landscape Guidance document. We currently have two direct links to this document. The first

is from this webpage, and the second is from our JLP Core Document Library List. We suggest that the WCBNP use the former for footnote 19.

- <https://www.babergh.gov.uk/documents/d/asset-library-54706/joint-landscape-guidance-aug-2015>
- <https://www.babergh.gov.uk/documents/d/babergh/d08-joint-landscape-guidance-2015>

Policy WCB10: Protecting and enhancing biodiversity

We make two minor observations (see bullet points), and then a more substantive comment which we ask the Examiner to consider.

- At the start of the second paragraph, delete the full stop and reformat accordingly.
- Through examination, we are anticipating that there will be a recommendation to add a footnote to the third paragraph of WCB10 to explain that there are certain types of development that are exempt from biodiversity gain. We leave the final wording of this footnote to the Examiner.

The third paragraph in WCB10 states that: “*Otherwise acceptable development proposals will be supported where they provide a minimum net gain of 10% in biodiversity, rising to 20% where possible ...*”.

The issue of whether an emerging neighbourhood plans should be allowed to set out, in policy, a community aspiration that would be supportive of proposal that deliver more than the minimum requirement for 10% net gain has been the subject of separate correspondence between this Council and Suffolk Wildlife Trust (SWT). Should they decide to make a written representation on this draft plan, SWT may comment on this issue.

In our response to SWT’s enquires we said that we would “*support NP Groups and communities being proactive in aspiring to achieve biodiversity enhancements and [that] we would encourage communities to undertake assessment and monitoring if the biodiversity in their areas.*” We also explained that Babergh and Mid Suffolk District Councils, “*through partnerships, are supporting the development of the wider Local Nature Recovery Strategy and that we are undertaking measures at the district level to ensure that we can be as proactive as possible in supporting biodiversity*”.

In short, we would be supportive of the retention of the ‘*aspiration*’ set out in WCB10 to deliver up to 20% net gain where possible.

Policy WCB11: Local Green Spaces

Not mentioned in our Reg 14 response, and we leave the Examiner to instruct accordingly, but we suggest that the last sentence in WCB11 should be deleted as this simply repeats what is already set out in national policy, i.e., NPPF (Dec 2023), para 107.

Chapter 8: Community and access

Updates noted. No further comments.

Chapter 9: Implementation and Monitoring

We have no comments to make on this chapter.

Appendices A to E

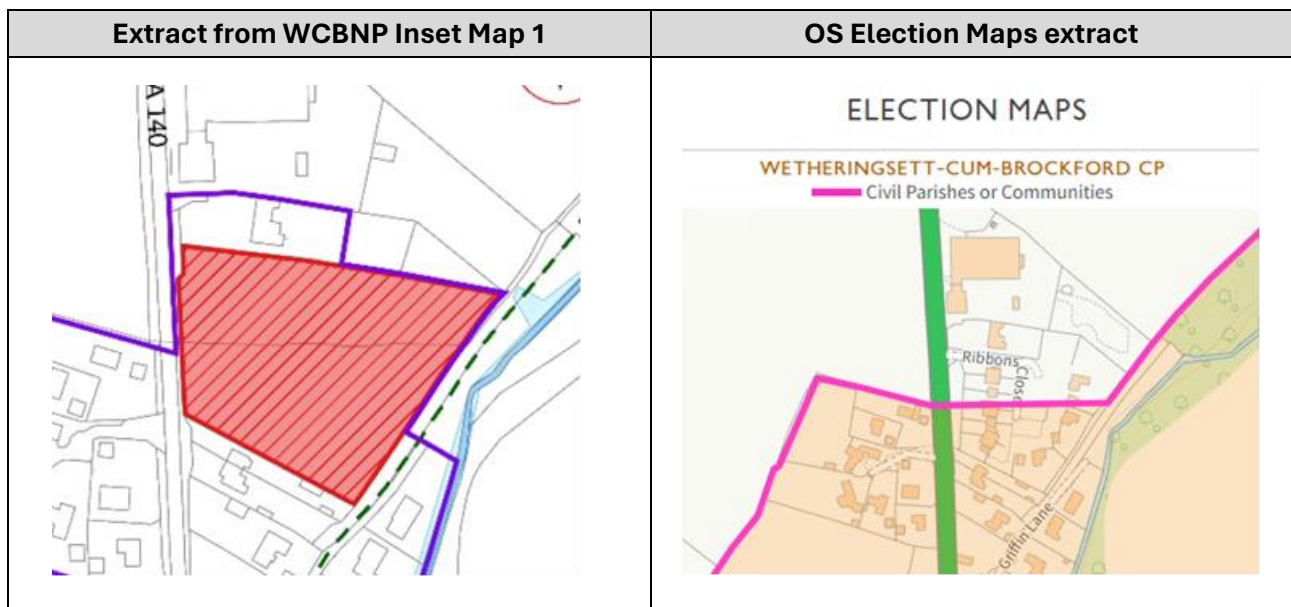
We have no other comments to make on these appendices

Appendix F: Inset (Map) 1 & 2

Inset (Map) 1 - Brockford Street

This map shows a red-hatched area within the settlement boundary as a 'site with planning permission'. This is the same site described as "substantially complete" in paragraph 1.30. To avoid confusion, we recommend that the red hatching be removed from the map and that these new properties simply be shown as part of Brockford Street.

Also overlooked by us all, the northernmost part of the proposed Brockford Street settlement boundary falls within the parish of Thwaite. We have already suggested to the Parish Council that this oversight could easily be addressed by showing the relevant part of the settlement boundary as a dotted line.



Inset (Map) 2 – Wetheringsett (Church)

This map also shows a red-hatched area as a 'site with planning permission'. This is the 14 dwelling (former football field east of Hockey Hill) site referred to in both para's 5.7 and 7.27, i.e., the site granted outline planning permission on appeal.

The site is shown as lying outside of but adjacent along its northern and western edge to the settlement boundary being proposed for adoption through this plan. We suggest that, in accordance with paragraph 1.26 of the WCBNP, this site should probably now be shown as lying within the settlement boundary.

[Ends]

(3) MENDLESHAM PARISH COUNCIL

MENDLESHAM PARISH COUNCIL



1 May 2024

Consultation on the submission draft Wetheringsett cum Brockford NP 2022 – 2037 Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Thank you for the opportunity for Mendlesham PC to comment upon the draft plan.
We feel that it is a sound document, recognising the needs of the rurality of the parish.

Clearly, we need to ensure that, as neighbours, your draft and our adopted plan are in concert.
We believe that they are.

One joint area of concern that your draft plan only slightly refers to are the numerous unauthorised caravan sites on Brockford Road that are situated in both of our areas. We appreciate that these are the subject of current enforcement action by the District Council but it is important to recognise these sites that are outside both of our settlement boundaries and do not meet your principal objective 3 in your plan – to protect rural character and open spaces.

Yours Sincerely

Amy Johnson

Amy Johnson
Parish Clerk
Mendlesham Parish Council.

(4) NATURAL ENGLAND

Date: 01 May 2024
Our ref: 470176
Your ref: Wetheringsett Cum Brockford Neighbourhood Plan

Mr Paul Bryant
Barbergh & Mid Suffolk District Council

BY EMAIL ONLY

communityplanning@baberghmidsuffolk.gov.uk



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Dear Mr Bryant

Wetheringsett Cum Brockford Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 15 March 2024.

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 does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

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

Natural environment information sources

The [Magic](#)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 from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². 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](#)³.

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.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ 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.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. 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.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ 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 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. 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 and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- 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 reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

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. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- 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).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.



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Wetheringsett NP Consultation'
c/o Mr P Bryant
Spatial Planning Policy Team
Mid Suffolk District Council
Endeavour House, 8 Russell Road
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IP1 2BX

18th April 2024

To Whom It May Concern,

RE: Wetheringsett-cum-Brockford Neighbourhood Plan Consultation under Reg. 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Thank you for sending us details of the Regulation 16 consultation for the Wetheringsett-cum-Brockford Neighbourhood Plan. Suffolk Wildlife Trust have read the plan and are happy to see that suggestions made in our previous letter¹, responding to the Regulation 14 consultation, have been included.

Suffolk Wildlife Trust have the following comments:

WCB10: Protecting and enhancing biodiversity

Suffolk Wildlife Trust support the aspiration for new development in the parish to deliver 20% net gain where possible.

Alongside many other Non-Government Organisations (NGOs) working in the conservation sector, Suffolk Wildlife Trust advocate that net gain should be increased to a minimum of 20%. There is clear evidence that greater confidence in positive ecological outcomes will be delivered should net gain deliver above 10%. DEFRA's Impact Assessment² Document states:

- *"In simple terms, [10%] is the lowest level of net gain that [DEFRA] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives."*
- *"Advice from some Natural Capital Committee members suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses."*

While recent changes to the wording of Planning Practice Guidance (PPG)³ may be off-putting to including policy or even aspiration to deliver net gain above 10%, the guidance also clearly states that plan-makers could seek a higher percentage net gain for area-wide plans or for specific allocations if a higher-level net gain is

¹ Letter, 5th August 2022, E. Shailes (Suffolk Wildlife Trust), RE: Wetheringsett cum Brockford DRAFT Neighbourhood Plan

² https://consult.defra.gov.uk/land-use/net-gain/supporting_documents/181121%20%20Biodiversity%20Net%20Gain%20Consultation%20IA%20FINAL%20for%20publication.pdf

³ <https://www.gov.uk/guidance/biodiversity-net-gain>

justified. Suffolk Wildlife Trust support Wetheringsett Parish Council in this aspiration and seek to provide further supporting information which we believe justifies this aspiration within the plan.

Justification of including a 20% net gain policy has been put forward within the Maidstone Local Plan (Regulation 19)⁴; the recent publication of the inspector's report⁵ of the plan acknowledges the justification, stating; *"there is nothing in the National Planning Policy Framework⁶ or the Environment Act 2021⁷ to suppress local authorities seeking more ambitious minimum targets through Local Plans provided it is justified."*

This sets a precedent that it is still viable for plans to include policy or aspiration for delivery of 20% net gain. Justification of this is clear in the eyes of Suffolk Wildlife Trust, with both local and national evidence showing that more needs to be done to halt wildlife decline and tackle the biodiversity crisis. The following support the need and desire for a 20% net gain policy or aspiration:

- Babergh Mid-Suffolk District Council declared a climate and biodiversity emergency in 2019⁸, and in September of the same year, councillors approved commitments to enhance and protect biodiversity across the district.
 - This clearly demonstrates local acceptance of the biodiversity crisis, and that in order to support nature further, an aspiration to deliver net gain above the minimum mandatory level is justified.
- Suffolk County Council have declared a climate emergency⁹ and note the importance to protect and enhance biodiversity in the county. The climate and biodiversity crises are intrinsically linked.
- In 2020, the government committed to protecting 30% of the UK's land by 2030¹⁰ (often called 30by30). Thanks to UK leadership, a global 30by30 target was adopted at the UN Biodiversity Summit COP15 in December 2022, as part of an ambitious Global Biodiversity Framework.
 - In October 2023, Wildlife and Countryside Link published the 30by30 in England 2023 Progress Report¹¹. This found:
 - The area of England effectively protected for nature is still hovering around 3.11% on land and at maximum 8% at sea.
 - The UK is one of the most nature-depleted countries in the world, sitting in the bottom 10% globally for biodiversity remaining.
- The 2023 State of Nature Report¹² highlights that, despite considerable conservation efforts over recent decades, many species continue to decline. This includes, of note to Suffolk:
 - The abundance of 753 terrestrial and freshwater species has on average fallen by 19% across the UK since 1970. Within this average figure, 290 species have declined in abundance (38%).
 - The UK distributions of 4,979 invertebrate species have on average decreased by 13% since 1970. Stronger declines were seen in some insect groups which provide key ecosystem functions such as pollination (average 18% decrease in species' distributions).
 - Since 1970, the distributions of 54% of flowering plant species and 59% of bryophytes (mosses and liverworts) have decreased across Great Britain.
 - 10,008 species were assessed using Red List criteria. 2% (151 species) are extinct in Great Britain and a further 16% (almost 1,500 species) are now threatened with extinction.

⁴ Maidstone Borough council, 2021, Local Plan review, Draft Plan for Submission (Reg.19), <https://drive.google.com/file/d/13MfNeKxSGxYlFfCCKZcP6-ggua2EFInbt/view>

⁵ Spencer, D., 2024, Report to Maidstone Borough Council, Report on the Examination of the Maidstone Local Plan Review, PINS/U2235/429/10, <https://drive.google.com/file/d/1BpJD7DyWVbclC0QQ2pLhEY5o3hWXo1Mb/view>

⁶ https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

⁷ <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

⁸ <https://www.babergh.gov.uk/documents/d/mid-suffolk/climate-change-and-biodiversity-annual-report-mid-suffolk>

⁹ <https://www.suffolk.gov.uk/council-and-democracy/our-aims-and-transformation-programmes/our-ambitions-for-suffolk/protecting-and-enhancing-our-environment>

¹⁰ https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf

¹¹ https://wcl.org.uk/assets/uploads/img/files/WCL_2023_Progress_Report_on_30x30_in_England_1.pdf

¹² https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf

- The UK Government’s 25-Year Environment Plan¹³ includes the following targets, which are more likely to be achieved should BNG deliver levels above 10%.
 - Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition
 - Creating or restoring 500,000 hectares of wildlife-rich habitat outside of the protected sites network, focusing on priority habitats as part of a wider set of land management changes
 - Increasing woodland in England in line with our aspiration of 12% cover by 2060; this would involve planting 180,000 hectares by the end of 2042.
- At a minimum, the UK has failed to meet 14 of the 19 Aichi biodiversity targets, the global nature goals the UK committed to meet by 2020¹⁴, which were put forward as part of a “2020 Vision”¹⁵.

Suffolk Wildlife Trust believe that the above provides significant justification to support aspirations for Biodiversity Net Gain to deliver above the statutory minimum requirement. We offer our support to the Wetheringsett-cum-Brockford Parish Council in delivering this policy.

Please do not hesitate to contact us should you require anything further.

Yours sincerely,

Alex Jessop
Planning & Advocacy Officer

¹³ <https://assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf>

¹⁴ <https://publications.parliament.uk/pa/cm5802/cmselect/cmenvaud/136/136-summary.html>

¹⁵ <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

(6) HISTORIC ENGLAND



Historic England

Mr Paul Bryant
Babergh & Mid Suffolk District Councils
Endeavor House
8 Russell Road
Ipswich
Suffolk
IP7 6SJ

Direct Dial: [REDACTED]

Our ref: PL00737802

19 April 2024

Dear Mr Bryant

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 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 [<mailto:eastplanningpolicy@historicengland.org.uk>](mailto: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.

Yours sincerely,

Ross McGivern
Historic Places Advisor
ross.mcgivern@historicengland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



(7) ENVIRONMENT AGENCY



Paul Bryant
BABERGH AND MID SUFFOLK
DISTRICT COUNCIL
8 (First Floor - Gold Block 1) Russell
Road
Ipswich
IP1 2BX

Our ref: AE/2024/129381/01-L01
Your ref: Wetheringsett cum
Brockford 16
Date: 03 May 2024

Dear Paul

CONSULTATION ON THE SUBMISSION DRAFT WETHERINGSETT CUM BROCKFORD NP 2022 – 2037 REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 (AS AMENDED)

ENDEAVOUR HOUSE RUSSELL ROAD, IPSWICH, SUFFOLK, IP1 2BX.

Thank you for consulting us on the pre-submission plan for the Wetheringsett cum Brockford Neighbourhood Plan.

For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.

Environmental Constraints

We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:

Flood Risk

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3 of the River Dove.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. [National Planning Policy Framework](#) (NPPF) paragraph 167 sets this out.

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licencing strategies (CAMS process) - GOV.UK (www.gov.uk).

Informatives

We encourage you to seek ways in which your neighbourhood plan can improve the

local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

Source Protection Zones

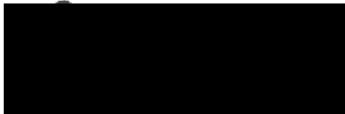
Your plan includes areas which are located on Source Protection Zones 1,2 and 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

Flood Defenses

Access to the natural high ground on the banks of the river must not be hindered.

We trust this advice is useful.

Yours sincerely



Mr Andrew Thornton
Planning Advisor

Direct dial: +44 20 3025 3127

Mobile: 07826434908

Direct e-mail: andrew.thornton@environment-agency.gov.uk

Team e-mail: Planning.EastAnglia@environment-agency.gov.uk

(8) ANGLIAN WATER

E fm: Carry Murphy | Spatial & Strategic Planning Manager
Rec'd: 20 March 2024
Subject: RE: Consultation on R16 Wetheringsett cum Brockford N'hood Plan (MSDC)

Dear Sir/ Madam,

Thank you for consulting Anglian Water on 2nd submission draft Wetheringsett cum Brockford Neighbourhood Plan.

We are not aware of any changes that would cause us to raise any objections and wish you every success in taking your plan forward.

Yours sincerely,

Carry Murphy

Chartered Town Planner - MRTPI
**Spatial and Strategic Planning Manager – Sustainable Growth
Quality & Environment**



Web: www.anglianwater.co.uk

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire. PE29 6XU

[Ends]

(9) NATIONAL LANDSCAPE TEAM

By e-mail: 18 March 2024

Subject: Re - Consultation on submission draft Wetheringsett cum Brockford NP 2022 - 2037

Good morning.

Thank you for consulting the National Landscape team on the submission draft Wetheringsett cum Brockford Neighbourhood Plan 2022 - 2037.

The area covered by the above Neighbourhood Plan lies outside both the Dedham Vale National Landscape and Stour Valley Project Area.

For this reason the National Landscape team does not wish to comment on the draft Wetheringsett cum Brockford Neighbourhood Plan 2022 - 2037.

Yours sincerely



**Suffolk & Essex
Coast & Heaths**
National
Landscape



Dedham Vale
National
Landscape
& Stour Valley

Beverley McClean

National Landscape Planning Officer

Email: beverley.mcclean@suffolkandessex-NL.org.uk

Phone: 01394 445225

Pronouns: She/Her

National Landscape Office, Saxon House, 1 Whittle Road,
Hadleigh Industrial Estate, Ipswich, Suffolk, IP2 0UH

www.coastandheaths-NL.org.uk

www.dedhamvale-NL.org.uk

Please consider the environment before printing this email.

[Ends]

(10) NATIONAL HIGHWAYS



Our ref: NH/24/05558 Wetheringsett NP Reg 16
Your ref: Wetheringsett cum Brockland NP Reg 16
Consultation

Wetheringsett NP Consultation
(c/o Spatial Planning Policy Team)
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

Shamsul Hoque
National Highways
Spatial Planning
Operations (East)
Woodlands
Manton Lane
Bedford MK41 7LW

Via email to communityplanning@babberghmidsuffolk.gov.uk

17 April 2024

Attention to: Paul Bryant

Dear Sir/Madam,

**THE 2ND SUBMISSION DRAFT WETHERINGSETT CUM BROCKFORD
NEIGHBOURHOOD PLAN 2022-2037
Consultation under Reg. 16 of the Neighbourhood Planning (General)
Regulations 2012 (as amended)**

Thank you for your correspondence, received on 15 March 2024, notifying National Highways of the consultation above.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Wetheringsett cum Brockland Neighbourhood Plan, we have responsibility for the trunk road A14, part of the Strategic Road Network (SRN).

This proposed Neighbourhood Plan area is remote from the nearest Strategic Road Network (SRN). Due to the proposed development scale, nature, and location, there would not be any predicted adverse impact on the Strategic Road Network (SRN).

National Highways do not have any further comment on this Second Submission Draft Wetheringsett cum Brockford NDP Consultation and the accompanying supporting documents.



Please contact us at PlanningEE@nationalhighways.co.uk if you require any clarification.

Yours faithfully,

S. H.
Shamsul Hoque
Assistant Spatial Planner

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

(11) EVOLUTION TOWN PLANNING (obo D I Alston Will Trust Ltd)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr Samuel Stonehouse
Job Title (if applicable):	Senior Planner
Organisation / Company (if applicable):	Evolution Town Planning
Address:	Evolution Town Planning Ltd Opus House, Elm Farm Park, Thurston Bury St Edmunds, Suffolk,
Postcode:	IP31 3SH
Tel No:	01359 233663
E-mail:	sam@evolution-planning.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	D I Alston Will Trust Ltd
Address:	██████████ ██████████ ██████████ ██████████
Postcode:	██████████
Tel No:	██████████
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

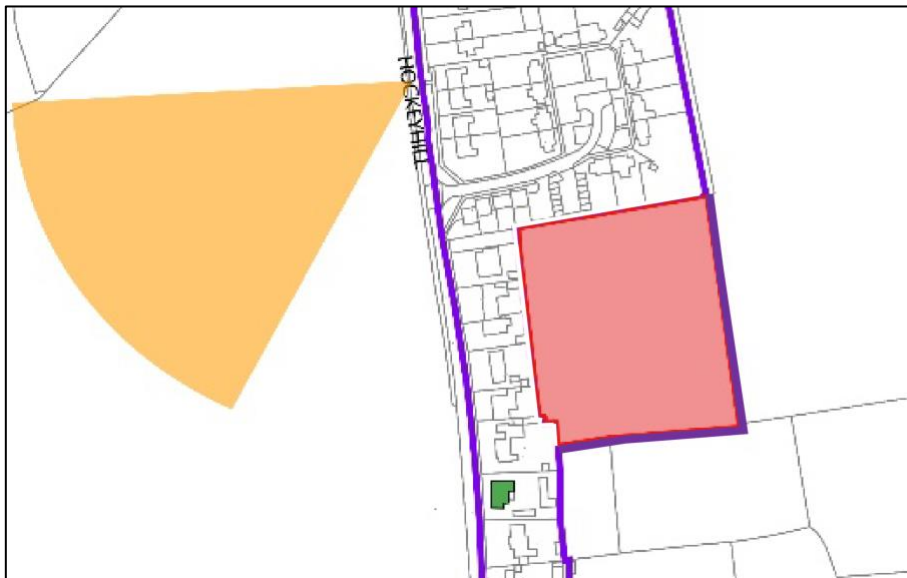
Paragraph No.	Appendix F - Inset 2	Policy No.	Appendix F - Inset 2
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support	Oppose	X
Support with modifications	Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

These representations object to the proposed Neighbourhood Plan settlement boundary map as shown in Appendix F - Inset 2 for Wetheringsett (Church). This shows the land east of Hockey Hill in Wetheringsett Cum Brockford, which benefits from extant outline planning permission DC/20/04921, outside of the defined settlement boundary. This representation proposed that this land is included within the defined settlement boundary, and the map is altered to include this permitted development site as follows;



We believe that the omission from the settlement boundary of the land east of Hockey Hill is a mistake as paragraph 1.26 states that; “it is proposed to use the settlement boundaries shown in Appendix F for the purposes of the Neighbourhood Plan Policies and these are largely based on those of the BMSJLP (November 2020) with some amendments to reflect latest permissions and commitments.”

The land east of Hockey Hill has an extant outline planning permission DC/20/04921, as such, this should be included within the proposed settlement boundary.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The land permitted for housing development under application DC/20/04921 should be included within the proposed settlement boundary for Wetheringsett (Church).

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

To provide details of the extant planning permission, the site, and its surrounding context.

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of the Wetheringsett cum Brockford NP by Mid Suffolk District Council	x

Signed:



Dated: 17.04.2024

Planning Department
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Our Ref E869.C1.Let01
16th April 2024

Dear Sir / Madam,

WETHERINGSETT CUM BROCKFORD DRAFT NEIGHBOURHOOD PLAN CONSULTATION RESPONSE

Introduction and Summary

These representations are submitted in response to the Wetheringsett cum Brockford Draft Neighbourhood Development Plan consultation. These representations propose a change to the settlement boundary shown in Appendix F, Inset 2 Map for Wetheringsett (Church) to include the land east of Hockey Hill. This land benefits from extant outline planning permission under reference DC/20/04921 (appeal reference 3292871). Outline planning permission was granted at appeal on 27th April 2023 and therefore remains extant until 26th April 2026. The site owners are preparing the Reserved Matters and fully intend for this site to be commenced and completed. The Neighbourhood Plan states that the settlement boundary reflects the latest permissions and commitments, as such, this land should be included within the boundary.

The appeal decision, location plan and indicative block plan are attached to this representation under Appendix 1.

Settlement Boundary Update

These representations seek a change to the draft Neighbourhood Plan so that the land to the east of Hockey Hill be included within the settlement boundary shown in Appendix F, Inset 2 Map for Wetheringsett (Church), as shown in Figure 1 and the attached amended map:

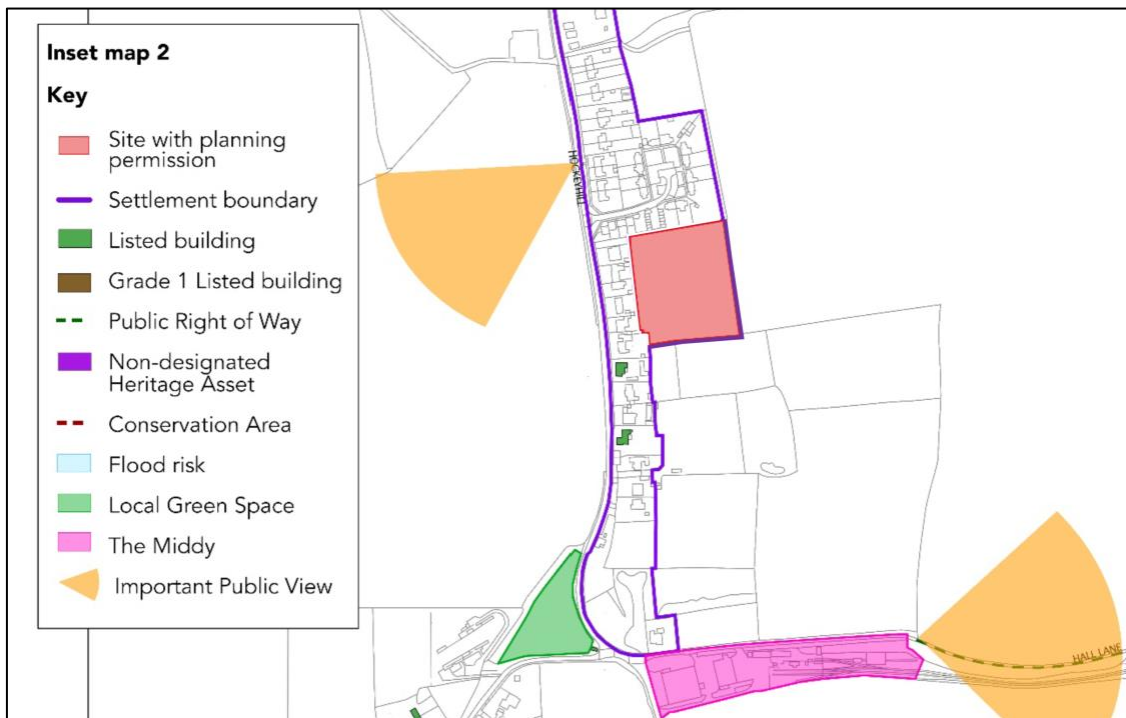


Figure 1 - Revised Settlement Boundary

Paragraph 1.26 of the Draft Neighbourhood Plan states that; *“it is proposed to use the settlement boundaries shown in Appendix F for the purposes of the Neighbourhood Plan Policies and these are largely based on those of the BMSJLP (November 2020) with some amendments to reflect latest permissions and commitments.”*

The land east of Hockey Hill should have been included within the settlement boundary shown in Appendix F, Inset 2, as this site has extant outline planning permission, as such it should be reflected in the Neighbourhood Plan as the site has permission.

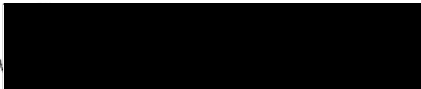
As set out in Paragraph 1.26, the settlement boundaries are based on The Draft Babergh Mid Suffolk Joint Local Plan settlement boundaries which were proposed in November 2020. These settlement boundaries were considered unsuitable by the Planning Inspectorate in December 2021 and the adoption of updated settlement boundaries and hierarchy was deferred to Part 2 of the Joint Local Plan. Babergh and Mid Suffolk Councils have recently undertaken a ‘Call for Sites’ public consultation regarding Part 2 of the Joint Local Plan, which ran from January to February 2024, indicating that this remains an early stage in the plan-making process. As such, the November 2020 settlement boundaries should not be considered suitable.

The land remains within the adopted settlement boundary for Wetheringsett, as set out in the 1998 Mid Suffolk Local Plan as it is well related to the existing village and it is a suitable site for a modest housing development suitable for a sustainable village such as Wetheringsett. As such, it should be included within the proposed Neighbourhood Plan Settlement Boundary.

Conclusion

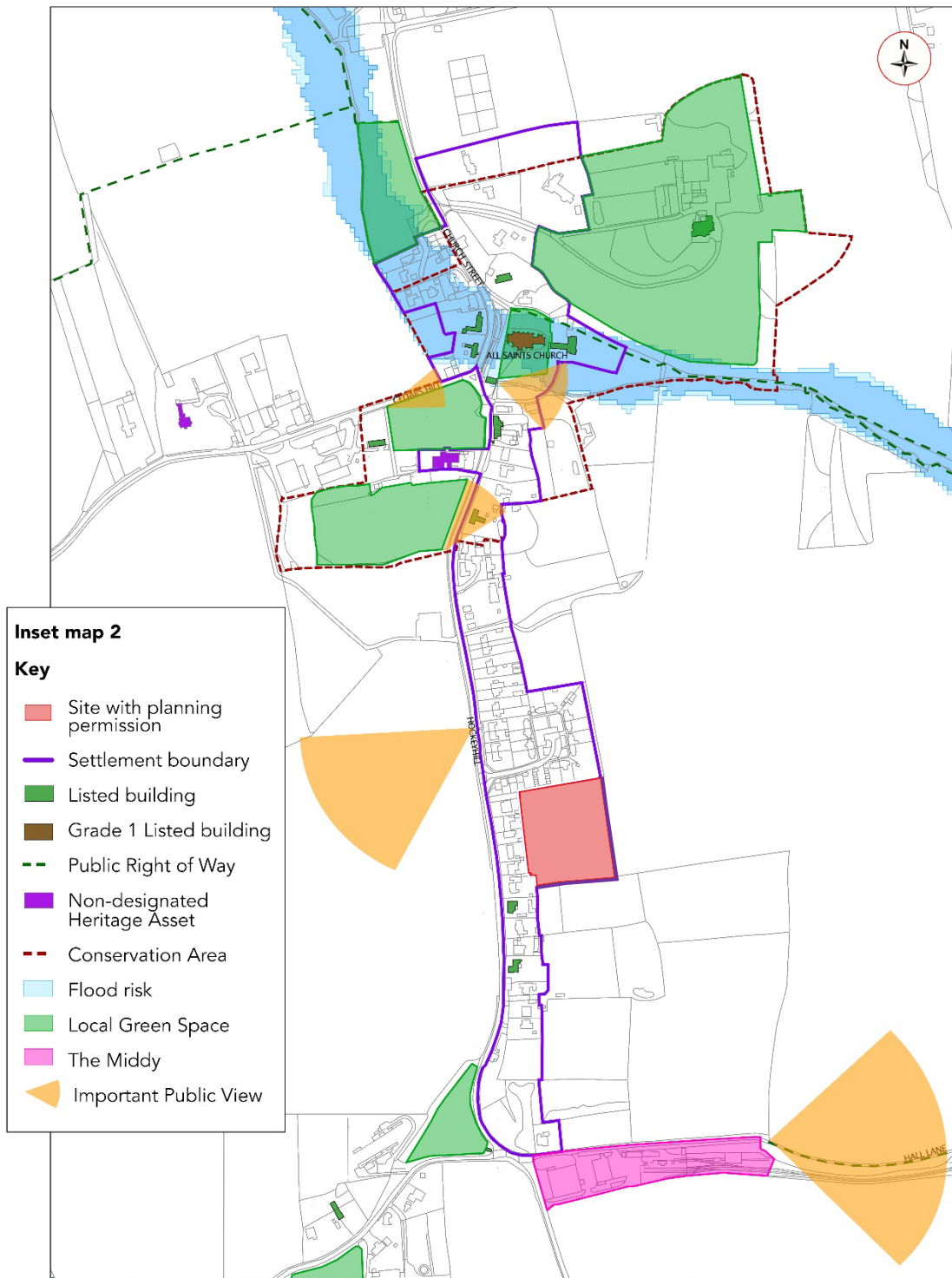
The land to the east of Hockey Hill should be included within the proposed settlement boundary for Wetheringsett as shown in Appendix F, Inset 2 Map of the Draft Neighbourhood Plan. This land has extant outline planning permission, as such the settlement boundary for the draft Neighbourhood Plan should be amended to reflect this as stated in the Draft Neighbourhood Plan.

Yours sincerely

A solid black rectangular box redacting the signature of Sam Stonehouse.

SAM STONEHOUSE
SENIOR PLANNER
EVOLUTION TOWN PLANNING LTD

Inset 2 – Wetheringsett (Church)



Appendix 1 – Appeal Decision 3292871 (Land east of Hockey Hill, Wetheringsett)



Appeal Decision

Site visit made on 17 February 2023

by K Savage BA(Hons) MPlan MRTPI

an Inspector appointed by the Secretary of State

Decision date: 27 April 2023

Appeal Ref: APP/W3520/W/22/3292871

Land to the East of Hockey Hill, Wetheringsett-Cum-Brockford, Suffolk IP14 5PN

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Dialston Will Trust Ltd against the decision of Mid Suffolk District Council.
 - The application Ref DC/20/04921, dated 30 October 2020, was refused by notice dated 14 September 2021.
 - The development proposed is 14 no. dwellings including 4 no. affordable dwellings, construction of access and associated parking.
-

Decision

1. The appeal is allowed and outline planning permission is granted for development of 14 no. dwellings including 4 no. affordable dwellings, construction of access and associated parking, at Land to the East of Hockey Hill, Wetheringsett-Cum-Brockford, Suffolk IP14 5PN in accordance with the terms of the application, Ref DC/20/04921, dated 30 October 2020, subject to the conditions set out in the attached schedule.

Preliminary Matters

2. The application was made in outline with the matters of access, scale and layout to be considered. I have approached the appeal on the same basis, with details relation to the reserved matters of appearance and landscaping being treated as solely illustrative at this stage.
3. I am considering this appeal at the same time as a proposal for 11 dwellings¹ on a site a short distance to the north along Hockey Hill. I have considered the appeals separately, but in doing so have been mindful of the potential cumulative effects of the two developments were both to be allowed.

Background and Main Issue

4. The appeal relates to a roughly square parcel of undeveloped land to the rear of dwellings on Hockey Hill and to the south of a small cul-de-sac containing Nos 18 to 33. The development would be accessed via the cul-de-sac, facilitated by the removal of existing blocks of garages between Nos 29 and 30. A roughly U-shaped layout of 8 bungalows and 6 two storey dwellings is proposed.
5. The application was recommended for approval by Council officers, but refused by its planning committee, on the basis that it would not enhance or maintain

¹ Appeal Ref: APP/W3520/W/22/3291190

the vitality of the rural community and would generate unsustainable traffic movements from future residents which would not support local services. No development plan policy conflict is cited in the reason for refusal, only conflict with Paragraph 79 of the National Planning Policy Framework (the Framework).

6. The main issue, therefore, is whether the proposal represents a suitable location for housing, having regard to the relevant local and national policy context and other material considerations.

Reasons

Location for housing

7. The development plan for the area comprises the Mid Suffolk District Core Strategy (September 2008) (the CS), the Core Strategy Focused Review (December 2012) (the FR) and saved policies of the Mid Suffolk Local Plan (September 1998) (the MSLP).
8. Policy CS1 of the CS designates Wetheringsett as a 'Secondary Village' at the bottom of the settlement hierarchy for the district. Secondary Villages are defined as villages unsuitable for growth but capable of taking appropriate residential infill and development for local needs only. This may include employment, amenity and community facilities as well as small-scale infill housing and "rural exception" sites for affordable housing.
9. The site lies within the settlement boundary for Wetheringsett as established under the MSLP and was previously allocated for housing. The settlement boundaries of the MSLP have not subsequently been updated, despite intentions to do so within the CS. The Council points to new settlement boundaries having been advanced as part of its submitted Joint Local Plan² (JLP). However, the JLP has not yet been adopted, and in the evidence before me there is a letter from the examining Inspectors in December 2021 raising concerns and requiring further work on the housing policies of the JLP. Consequently, I place limited weight on the proposed boundaries and have considered the proposal on the basis of the 1998 boundaries still in place, in line with the suggested course of action of the examining Inspectors.
10. Being within the settlement boundary, the proposed 14 dwellings, including 4 affordable units, would be supported under Policies CS1 and CS2 which allow for provision for meeting local housing needs within designated settlement boundaries, in particular affordable housing.
11. However, notwithstanding this, the Council argues that the location of the housing would be unsuitable due to Wetheringsett lacking services and facilities for day-to-day living, which would significantly increase reliance on the private car and vehicle movements in and out of the village. It argues that any use of the few services within the village would not be sufficient to sustain or enhance the vitality of the community. The Council also points out that, under its draft JLP, Wetheringsett is not proposed to be elevated in the settlement hierarchy but is proposed to be designated as 'hinterland,' an area not proposed for major market development.
12. The Framework at Paragraph 79 sets out that housing should be located where it will enhance or maintain the vitality of rural communities, and identify

² In conjunction with Babergh District Council

opportunities for villages to grow and thrive, especially where this will support local services. The Framework adds that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, whilst recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

13. The appeal site is adjacent to the main part of the village, Wetheringsett-Cum-Brockford – Church, which includes a church, village hall, primary school and play area. The addition of dwellings would have a positive effect in terms of support for these facilities, which could be reached on foot. The nearest shop, a convenience store forming part of a petrol station on the A140 some 1.8km away, is beyond reasonable walking distance, and is said to offer a limited range of goods. That said, the Framework recognises that where there are groups of smaller settlements, development in one village may support services in a village nearby. Mendelsham, around 3.5km away, has additional services including a health centre, local shop, chip shop, playing fields and a community centre which future residents could patronise.
14. The limited facilities in the village mean that residents are still likely to travel beyond the village to avail of most services and employment opportunities and would rely on the private car to do so as the distances involved would preclude walking or cycling, and with no conveniently located or regular public transport option, the nearest being the 113 service stopping on the A140 some 1.4km away. However, the dispersed layout of Wetheringsett means that any development is going to be closer to some facilities than others, and not all are going to be walkable given the distances and road conditions. The scale of the proposal also means the number of journeys is not likely to be significant and many trips, such as to the facilities in Mendelsham, would be short. Importantly, the proximity of the local primary school and church would encourage regular trips by walking or cycling which would help to reduce the overall reliance on the private car. In addition, I am told that the primary school is undersubscribed. The addition of development close to the school would potentially generate additional demand for pupil places which would support its ongoing viability.
15. Overall, the location of the proposal would not conflict with the spatial strategy of the development plan as expressed through Policies CS1 and CS2. I acknowledge that the level of service provision within the village is limited, and as such there would be a reliance on the private car for most journeys. However, the harm in this respect is mitigated by the proximity of the primary school, the support the development would provide to the school, and the potential for many car journeys to be relatively short. Consequently, in terms of accessibility to services and the vitality of the rural community, I conclude on balance that the proposal would represent a suitable location for housing.

Parking and Traffic Movements

16. The Council's criticism of increased traffic movements relates primarily to use of the private car as set out above, but further concerns are raised in respect of the parking layout proposed and potential safety issues with the operation of the local highway network.
17. The evidence before me indicates that the addition of 14 dwellings would lead to 11 additional trips in the peak period. This would not be a significant

increase bearing in mind it would be spread out over a period of an hour or more. Moreover, my observations on site were of the existing highway network being very lightly trafficked and capable of accommodating additional traffic without severe impact on its operation. I appreciate that during school pick-up and drop-off times there may be some congestion along Hockey Hill, but this is by its nature temporary and the scale of development proposed would not exacerbate this to a significant degree.

18. The Council at appeal stage criticises the tandem parking layout of some units, in that they may add unnecessarily to the number of vehicle movements within the estate should residents have to manoeuvre one car to allow another in or out. Such arrangements are not uncommon in housing estates, and whilst I accept that they may lead to some additional movements, I am not persuaded that they would be so frequent as to cause demonstrable harm to highway or pedestrian safety, or to neighbours' living conditions through noise or disturbance.
19. The Council has not opposed the loss of the existing garages but argues that the proposed parking spaces at the site entrance would be too distant from the existing dwellings in the Hockey Hill cul-de-sac and therefore not of use to existing residents. I have limited information regarding the existing use of the garages, though the appellant asserts they are rarely used for parking. I have no evidence that the proposal would lead to an unaddressed displacement of parking onto the cul-de-sac or the proposed development. Moreover, from what I saw on site, the proposed spaces would be close to a number of dwellings within the cul-de-sac and capable of providing convenient additional parking for residents and visitors. As such, I find no harm in these respects.
20. Concern has also been raised in respect of an existing agricultural access from Hockey Hill. This is to be retained but I am satisfied that it would not be used as a cut-through by residents given how close it would be to the actual entrance and that it would be unpaved, more difficult to navigate and certainly no quicker a route for drivers.
21. Some interested parties also question the suitability of the footpath between the site and the school. I walked this at my visit and although it is narrow in places, it is passable along its length, and there would not be such a level of pedestrian traffic that those using it would be routinely forced onto the road. I am satisfied that the existing footpath would provide a safe means of access to the school.
22. For these reasons, I conclude that the proposal would be acceptable in terms of its effect on highway safety. As indicated, the Council has not cited conflict with any development plan policy, but of those referred to me, I find no conflict with saved Policies H13, T9 and T10 of the MSLP which together require safe access and egress to be provided, regard to be had to the suitability and capacity of existing roads; and for road layouts and parking to be designed and provided in line with relevant standards. Nor would there be any conflict with the Framework, which directs that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Other Material Considerations

Effect on Heritage Assets

23. The Council considered the implications of the proposal on the settings of two listed buildings to the south-west of the appeal site, Paxes House and Hill Farm House, and determined that the countryside setting of these listed buildings would be maintained to the rear and south-east of these assets with the loss of setting to the north-east resulting in a very low level of less than substantial harm to heritage significance. Having observed the location of these buildings, which form part of the linear development along Hockey Hill and are separated from the appeal site by other dwellings and a substantial tree line, I concur with the Council that any harm in this respect would be very limited in the case of Paxes House, being the nearer of the two, with no harmful effect to Hill Farm House given its greater distance and additional intervening buildings and landscape features.
24. Paragraph 202 of the Framework directs that less than substantial harm to the significance of a designated heritage asset should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
25. The proposal would deliver 11 dwellings which would contribute to the Government's objective of significantly boosting the supply of homes, although in light of the Council's stated housing land supply of over 9.5 years, which is not directly challenged by the appellant, the proposal would not be essential for meeting housing targets and so this benefit, by itself, would attract limited weight in favour of the proposal.
26. There would be economic benefits arising from the construction of the dwellings, and subsequently from engagement by future residents in the local economy. Given the scale of the proposal, such benefits would attract limited weight.
27. The proposal would deliver a policy compliant four affordable housing units. This would help to meet a local need for such housing as set out under Policy H4 of the MSLP. Notwithstanding the Council's criticism of the site's location, their delivery would still be a benefit of the proposal attracting moderate weight.
28. I also afford moderate weight to the potential benefits to the viability of the local primary school through increased demand for places from new families who may occupy the development.
29. Overall, I find that the public benefits in this case would outweigh the low level of less than substantial harm to the setting of Paxes House.

Other Issues Raised

30. I have had regard to a number of matters raised by interested parties, beyond those already captured by the main issues above. Concerns regarding disruption during construction are noted. Although I accept this would be a source of noise and disturbance for nearby occupants, it would be temporary in nature and is a factor in every building operation. As such, it would not be a valid reason to withhold permission. However, the degree of disturbance can be

addressed through suitable planning conditions to control the hours of working and methods employed on site.

31. The Council has not opposed the proposal in terms of neighbours' living conditions. The dwellings to the western boundary of the site on Hockey Hill are bungalows with relatively tall rear fences and several with detached garages within their rear gardens. The nearest dwellings within the development would also be single storey in height. This would limit the degree of intervisibility between dwellings either side of the western boundary of the site, such that sufficient levels of privacy would be retained for both existing and new residents.
32. I accept that the existing vista over the undeveloped site and open countryside beyond would be lost for existing residents. However, this is not a protected view and whilst neighbours' outlook would include the massing of the proposed dwellings, their single storey scale and separation distance from existing dwellings would avoid creating an undue sense of enclosure or severe loss of outlook.
33. Reference is made to the use of the site as a local playing space and having a role as a wildlife corridor linking habitats. The appellant states that the site has not been used as a play space for over 50 years, and any activity in that time has not been with the consent of the landowner. The site was in a natural state at the time of my visit, with substantial grass growth which did not suggest any recent use as a play space. The Council has not opposed the application on the grounds of ecological impacts, and having regard to the evidence provided, I have no reasons to reach different conclusions.

Planning Obligation

34. The appellant has provided a signed and dated Section 106 Agreement. This would secure delivery of the four affordable housing units and payment of a secondary school transport contribution. I am satisfied that each sought obligation meets the tests set out in Paragraph 57 of the Framework for planning obligations. As a result, I have taken the completed agreement into account.

Conditions

35. The Council has provided a list of prospective conditions, upon which the appellant has had the chance to comment. Where necessary, I have amended the wording of conditions to ensure they meet the relevant tests set out in the Framework.
36. Conditions relating to the timing of reserved matters applications [1, 2], implementation of the development [3] and the relevant approved plans and documents [4] are all necessary to provide certainty.
37. Details of a surface water drainage scheme [5] are required to address site drainage and flood risk, to include a verification report [22] on completion of the development. A condition is required for the submission, approval and implementation of a Construction Environmental Management Plan [6] to protect neighbours' living conditions. Details of water, energy and resource efficiency measures [7] are required in the interests of sustainability. Precise details of the site access [8] are required in the interest of highway safety. A scheme of archaeological investigation and written report [9, 10] are required

to ensure any archaeological remains are properly recorded and preserved. Each of these conditions is required to be pre-commencement as they relate specifically to the construction phase and would be ineffective or lead to harm or loss were they required to be addressed at a later stage.

38. Further conditions are required in respect of refuse/recycling facilities [11] to are required to maintain public health and the general amenity of the area; for a biodiversity enhancement strategy [12] and agreed mitigation measures [13] to be implemented in the interest of protecting species and promoting biodiversity.
39. It is necessary to require works to be undertaken in accordance with the submitted arboricultural details [14] and to set parameters for the planting and maintenance of site landscaping [15] to protect existing trees and ensure a satisfactory overall appearance.
40. Conditions in respect of the use of the existing field access [16], the provision of visibility splays [17], providing manoeuvring space for refuse vehicles [18] and implementing the proposed parking areas [19] are all necessary in the interests of highway and pedestrian safety. Details of cycle parking arrangements [20] and fire hydrants [21] are necessary in the interest of promoting sustainable modes of transport and fire safety, respectively.
41. Details of electric vehicle charging facilities are sought by the Council. However, since June 2022, the requirement to provide electric vehicle charging points has become part of the Building Regulations, and so it is not necessary to duplicate this requirement by condition.

Conclusion

42. For the reasons set out, I conclude that the proposal accords with the development plan, taken as a whole. Material considerations in this case, including the Framework, do not indicate that permission should nevertheless be withheld. Therefore, the appeal should be allowed.

K Savage

INSPECTOR

SCHEDULE OF CONDITIONS

Procedural Matters

- 1) Details of appearance and landscaping (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the following drawings/documents:
 - Block Plan - Proposed LTA 7374-001D - Site Plan
 - Red Line Plan LTA 7374-001D - Site Location Plan
 - Design and Access Statement – Hucklesby Architects
 - Heritage Statement – Hucklesby Architects
 - Enviro check flood report (3/11/20)
 - Land Contamination Report including Flood Risk Assessment 07.2020 – Oakley Soils Ltd. Part 1
 - Land Contamination Report including Flood Risk Assessment 07.2020 – Oakley Soils Ltd. Part 2
 - Land Contamination Report including Flood Risk Assessment 07.2020 – Oakley Soils Ltd. Part 3
 - Land Contamination Report including Flood Risk Assessment 07.2020 – Oakley Soils Ltd. Part 4
 - Norfolk Trees - Arboriculturist Report
 - GH Bullard - Flood Assessment and Drainage Report
 - Anglian Ecology Report - Great Crested Newt Survey
 - GH Bullard & Associates – Drainage
 - Preliminary Ecological Appraisal (Anglian Ecology, March 2019)
 - Anglian Ecology - Updated Preliminary Ecological Appraisal (original dated 24.03.2019 submitted with Outline Planning Application on 30.10.20)

Pre-commencement

- 5) Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority (LPA). The scheme shall be in accordance with the approved FRA and include:

- a. Dimensioned plans and drawings of the surface water drainage scheme;
- b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
- c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
- d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
- e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year rainfall event including climate change, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- g. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority;
- h. Details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include:-
 - i. Temporary drainage systems
 - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 - iii. Measures for managing any on or offsite flood risk associated with construction.

The scheme shall be fully implemented as approved.

- 6) Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the local planning authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- Hours of working during the site clearance, demolition, and construction phases of development - to be agreed, in writing, by the local planning authority;
 - Means of access for construction traffic;
 - Haul routes for construction traffic on the highway network and monitoring and review mechanisms;
 - Provision of boundary hoarding and lighting;
 - Details of proposed means of dust suppression;
 - Details of measures to prevent mud from vehicles leaving the site during construction;
 - Details of deliveries times to the site during construction phase;
 - Details of provision to ensure pedestrian and cycle safety;
 - Programme of works (including measures for traffic management);
 - Parking and turning for vehicles of site personnel, operatives and visitors;
 - Loading and unloading of plant and materials;
 - Storage of plant and materials;
 - Maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.
- 7) Prior to the commencement of development, a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the local planning authority. The scheme shall include a clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.
- 8) Before the development is commenced, details of the access and associated works, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the local planning authority. The access shall then be fully provided in accordance with the approved details and shall be made available to use prior to first occupation of the development hereby approved.
- 9) No development shall take place until a scheme of archaeological evaluation of the site has been submitted to and approved in writing by the local planning authority (including any demolition needing to be carried out as necessary in order to carry out the evaluation). The evaluation shall be carried out in its entirety as may be agreed to the satisfaction of the local planning authority,
- 10) No development shall take place until a written report on the results of the archaeology evaluation of the site has been submitted to the local planning authority and that confirmation by the local planning authority has been provided that no further investigation work is required in writing.

Should the local planning authority require further investigation and works, no development shall take place on site until the implementation of a full programme of archaeological work has been secured, in

accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the local planning authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording.
- b. The programme for post investigation assessment.
- c. Details of the provision to be made for analysis of the site investigation and recording.
- d. Details of the provision to be made for publication and dissemination of the analysis and records of the site investigation.
- e. Details of the provision to be made for archive deposition of the analysis and records of the site investigation; and
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

The written scheme of investigation shall be carried out in its entirety prior to any other development taking place, or in such other phased arrangement including a phasing plan as may be previously approved in writing by the local planning authority.

No building shall be occupied until the archaeology evaluation, and if required the Written Scheme of Investigation, have been completed, submitted to and approved, in writing, by the local planning authority. Furthermore, no building shall be occupied until analysis, publication and dissemination of results and archive deposition from the archaeology investigations as agreed under the Written Scheme of Investigation has taken place, unless an alternative agreed timetable or phasing for the provision of results is agreed in writing by the local planning authority.

Before development above slab level

- 11) Prior to commencement of development above slab level, details of the areas to be provided for storage and presentation of refuse/recycling bins shall be submitted to and approved in writing by the local planning authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose(s).
- 12) Prior to commencement of development above slab level: a Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the local planning authority following the recommendations made within the Preliminary Ecological Appraisal (Anglian Ecology, March 2019). The content of the Biodiversity Enhancement Strategy shall include the following:
 - a) Purpose and conservation objectives for the proposed enhancement measures;
 - b) detailed designs to achieve stated objectives;
 - c) locations of proposed enhancement measures by appropriate maps and plans;
 - d) persons responsible for implementing the enhancement measures;

e) details of initial aftercare and long-term maintenance (where relevant).

The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter.

During construction/Prior to occupation

- 13) All changes in ground levels, hard landscaping, planting, seeding or turfing shown on the approved landscaping details (as required by Condition 1 above) shall be carried out in full during the first planting and seeding season (October - March inclusive) following the commencement of the development or in such other phased arrangement as may be approved, in writing, by the local planning authority up to the first use or first occupation of the development. Any trees, hedges, shrubs or turf identified within the approved landscaping details (both proposed planting and existing) which die, are removed, seriously damaged or seriously diseased, within a period of 10 years of being planted or in the case of existing planting within a period of 10 years from the commencement of development, shall be replaced in the next planting season with others of similar size and species.
- 14) The existing field access, which crosses part of the site, shall be retained as a result if the development hereby approved and shall remain available for use during site clearance, demolition and construction phases.
- 15) All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Anglian Ecology, March 2019), the eDNA Survey (Anglian Ecology, April 2021), the eDNA Survey (Anglian Ecology, April 2021) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.
- 16) Before the access is first used visibility splays shall be provided as shown on approved drawings and shall thereafter retained and maintained in the approved form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development)(England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.
- 17) The development hereby permitted shall be undertaken in accordance with the measures as outlined with the Norfolk Trees - Arboriculturist Report (November 2020), as submitted with the planning application.
- 18) The proposed estate road(s) shall be made suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around, and the estate road surfaces and construction shall be suitable for an RCV to drive on.
- 19) The use shall not commence until the areas within the site shown on the approved drawings for the purposes of loading, unloading, manoeuvring and parking (including garage spaces as applicable) of vehicles have been fully provided and made functionally available for use. Thereafter those areas shall be retained and remain free of obstruction except for the purpose of manoeuvring and parking of vehicles.

- 20) Notwithstanding the approved details, the use shall not commence until precise details of secure cycle storage areas have been provided and approved, in writing, by the local planning authority. The approved areas shall then be fully provided prior to first occupation and shall be retained thereafter for no other purpose(s).
- 21) Prior to the first occupation of the site, details of the provision of fire hydrants shall be submitted to and approved, in writing, by the local planning authority. The fire hydrants shall be carried out in accordance with these details in their entirety and in accordance with the timetable as may be agreed.

Post development

- 22) Within 28 days of practical completion of the last dwelling or unit, a Sustainable Drainage System (SuDS) verification report shall be submitted to the LPA, detailing that the SuDS have been inspected, have been built and function in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks have been submitted, in an approved form, to and approved in writing by the LPA for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

NOTE DO NOT SCALE DRAWINGS. DIMENSIONS are the only reference for the design. Do not use the drawings for construction or any other purpose without the consent of the architect.

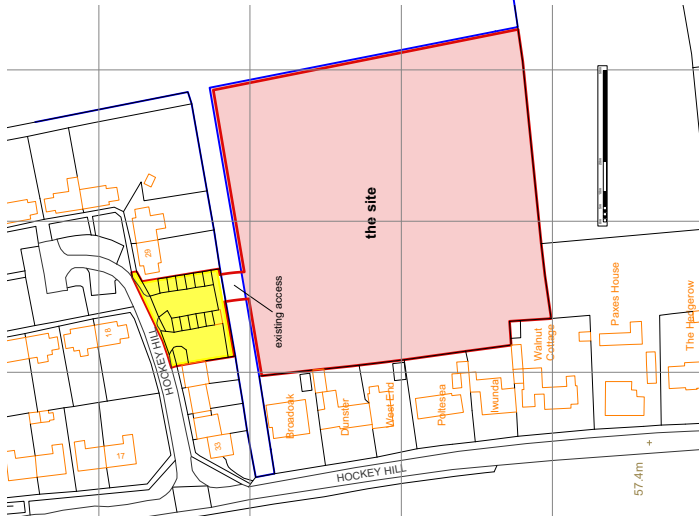
The drawing is to be read in conjunction with all relevant conditions and specifications.

The Drawing Copyright © Thurlow Architects

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Rev	Notes	By	Date
A	Layout revised to accommodate planning	mk	07/05/21
B	Approved building (plan, 5/18/3) amended	mk	14/02/21
C	Parking to accommodate housing plots 6 and 7	mk	15/02/21
D	Finalise site to the east of the building pond adjacent to the east to be retained.	mk	30/07/21

REVISIONS	
Rev	Notes
A	Layout revised to accommodate planning
B	Approved building (plan, 5/18/3) amended
C	Parking to accommodate housing plots 6 and 7
D	Finalise site to the east of the building pond adjacent to the east to be retained.



site location plan

scale 1:1250

Thurlow Architects
 the studio
 61 horwicks lane
 bury st lewys
 suffolk, ip33 2fb
 t: 01284 706805
 info@thurlowarchitects.co.uk
 www.thurlowarchitects.co.uk

client: **D.L. Alston Will Trust Ltd**
 project: **Land to East of Hockey Hill**
 Welington-cum-Stockford
 Suffolk, IP14 5FN
 drawing title: Site Layout and Location Plan

drawing status: **Planning**

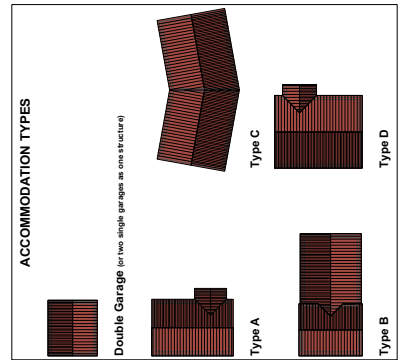
73374
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 Oct 20



site plan

scale 1:500

SITE DETAILS	
Area Of The Site	0.9ha.
Number Of Units	14
Number Of Beds	32 (accommodating 54 people)



ACCOMMODATION SCHEDULE			
Plot Nos.	Dwelling Ref.	Dwelling Type	Approx. Floor Area
Plot One	Type A	3b5p detached house	135m ² two storey
Plot Two	Type A	3b5p detached house	135m ² two storey
Plot Three	Type A	3b5p detached house	135m ² two storey
Plot Four	Type A	3b5p detached house	135m ² two storey
Plot Five*	Type B	2b4p semi detached house	86m ² two storey
Plot Six*	Type B	2b5p semi detached bungalow	63m ² single storey
Plot Seven*	Type B	2b5p semi detached bungalow	70m ² single storey
Plot Eight*	Type B	2b4p semi detached house	86m ² two storey
Plot Nine	Type C	2b5p semi detached bungalow	70m ² single storey
Plot Ten	Type C	2b5p semi detached bungalow	70m ² single storey
Plot Eleven	Type D	2b5p detached bungalow	95m ² single storey
Plot Twelve	Type D	2b5p detached bungalow	95m ² single storey
Plot Thirteen	Type D	2b5p detached bungalow	95m ² single storey
Plot Fourteen	Type D	2b5p detached bungalow	95m ² single storey

* denotes affordable housing

PARKING SCHEDULE			
Dwelling Ref.	No. Of Units	Spaces	Total
Type A	4	4	16
Type B	4	2	8
Type C	2	2	4
Type D	4	3	12
Visitors	1	4	4
Visitors (disabled)	1	1	1
Total			45
MSDC	1	5	5
MSDC (disabled)	1	3	3
Total			8
GRAND TOTAL			54

(12) EVOLUTION TOWN PLANNING (obo Mr Ribbons)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr S Stonehouse
Job Title (if applicable):	Planning Consultant
Organisation / Company (if applicable):	Evolution Town Planning
Address:	Opus House Elm Farm Park Thurston Bury St Edmunds Suffolk
Postcode:	IP31 3SH
Tel No:	01359233663
E-mail:	sam@evolution-planning.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Mr M Ribbons
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	WCB1
----------------------	--	-------------------	------

Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	x
Support with modifications		Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

Please see the submitted letter for full details of consultation response comments – Ref E385.C1.Let04

These representations seek a change to policy draft Policy WCB1. The wording of this policy currently states that:

“The focus for new development will be the defined settlement boundaries at Wetheringsett (Church), Brockford Street and Wetherup Street/Park Green as shown on the relevant policies maps.

New or windfall development within these defined settlement boundaries should be small-scale (meaning individual houses or small grounds and proposals should enhance the area’s form, character and setting...”

These representations suggest that this draft policy is updated to allow small-scale windfall development within and adjacent to the settlement boundary. There are very few locations within the proposed settlement boundary which allows infill development. Allowing small development adjacent to the settlement boundary will allow a small number of minor developments to come forward which will provide housing for local people which would otherwise not be developed over the Neighbourhood Plan period. Allowing the conditions for the development of a small number of houses reduces the need for larger sites to be allocated later and provides housing for local people.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

these representations suggest that the wording of policy WCB1 is updated as follows:

“WCB1: Location of new housing

The scale of new housing within the parish during the plan period will reflect its position within the adopted Local

Plan settlement hierarchy

*The focus for new development will be **within or adjacent to** the defined settlement boundaries at Wetheringsett (Church), Brockford Street and Wetherup Street/Park Green as shown on the relevant policies maps.*

*New or windfall development **within or adjacent to** these defined settlement boundaries should be small-scale (meaning individual houses or small grounds and proposals should enhance the area's form, character and setting and not have significant adverse*

impacts upon:

- a) Heritage assets (designated or undesignated)*
- b) Nature conservation interests*
- c) Highway safety or public rights of way*
- d) the amenity of adjoining occupiers, or*
- e) other identified constraints (e.g. flood risk, water and wastewater supply).*

New developments should actively seek to facilitate walking and cycling.

*Proposals for development located outside of, **and not adjacent to**, the defined settlement boundaries, will only be permitted where they are in accordance with adopted national and local policies, they comply with criteria a-e above and where they would not result in the erosion of undeveloped gaps between the distinct hamlets.*

Development may only be supported where no likely significant effects (LSE) or adverse effects on site integrity (AEoI) have been demonstrated through an individual project-level HRA"

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

It would be necessary to provide comments on the proposed changes to the policy wording.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
--	---

The final 'making' (adoption) of the Wetheringsett cum Brockford NP by Mid Suffolk District Council	x
---	---

Signed: S Stonehouse	Dated: 20.03.2024
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Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.	Inset 1 – Brockford Street Settlement Boundary	Policy No.	
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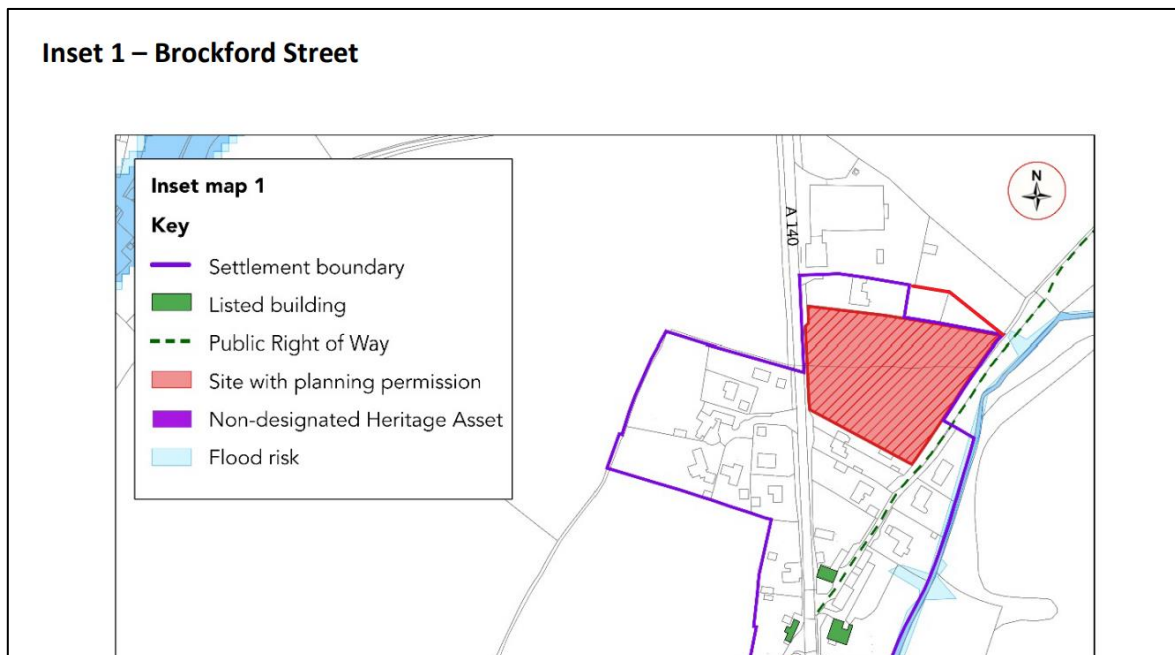
Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support	Oppose
Support with modifications	Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Please see the submitted letter for full details of consultation response comments – Ref E385.C1.Let04

These representations seek a minor change to the Neighbourhood Plan Settlement Boundary for Brockford Street as shown in Figure 1 below. This updated boundary is a logical squaring off the northeast corner of the existing settlement boundary and will include a small area of land that is in a sustainable location and is well-related to the existing housing on Brockford Street as shown in the following image:



(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Amending to the proposed Brockford Street Settlement Boundary to include to the small area of land to the northeast as shown in the by the red line in the following image:



(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

It would be necessary to provide comments on the site context, surroundings and uses.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of the Wetheringsett cum Brockford NP by Mid Suffolk District Council	x

Signed: S Stonehouse	Dated: 20.03.2024
-----------------------------	--------------------------

Planning Department
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Our ref: E385.C1.Let04
21st March 2024

Dear Sir / Madam,

WETHERINGSETT CUM BROCKFORD DRAFT NEIGHBOURHOOD PLAN CONSULTATION RESPONSE

Introduction and Summary

These representations are submitted in response to the Wetheringsett cum Brockford Draft Neighbourhood Development Plan consultation. This representation proposes a minor change to the settlement boundary around Brockford Street to include a small piece of land which is in a sustainable location and is well-related to the existing houses in the village. This representation also suggests a change to the wording of the draft Neighbourhood Plan Policy WCB1 to allow infill or windfall development within or adjacent to the defined settlement boundary.

Settlement Boundary Update

These representations seek a minor change to the Neighbourhood Plan Settlement Boundary for Brockford Street as shown in Figure 1 below. This updated boundary is a logical squaring off the northeast corner of the existing settlement boundary and will include a small area of land that is in a sustainable location and is well-related to the existing housing on Brockford Street.

Evolution Town Planning Limited

Registered Office:

Opus House Elm Farm Park
Thurston Bury St Edmunds
Suffolk IP31 3SH

Registered in England Number
10636748



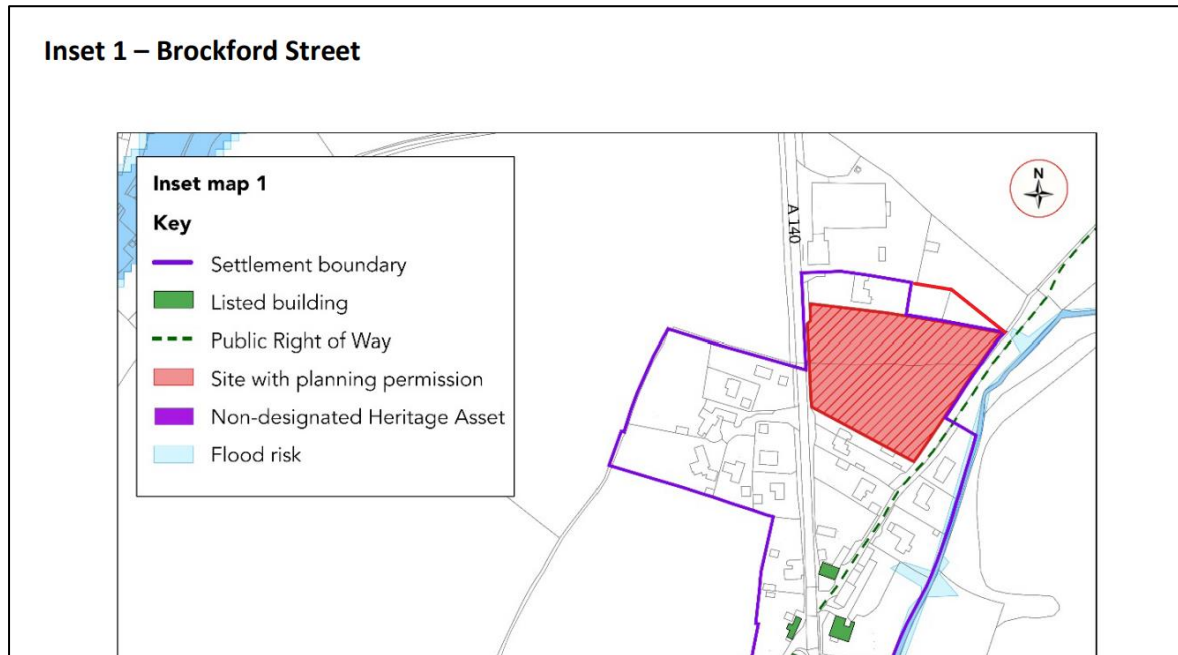


Figure 1- Proposed Change to Settlement Boundary

This area of land could provide a discrete infill development of one or two houses on land which is well related to existing residential properties which are positioned on two sides of the site. The site is located to the rear of the bungalow, Ashlea, and directly to the north of a housing development of 9 homes which are currently under construction.

As set out in Paragraph 70 of the NPPF, small sites such as this can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. This site could be used for community-led development or self-build and custom-build housing.

The site is sustainably located next to the village shop, which can provide future residents with many of their day-to-day needs. It is a short cycle to the nearby villages of Mendlesham and Wetheringsett. There are footways which lead from the submission site through Brockford Street to the bus stop. A regular bus service connects Brockford Street with the surrounding villages, and the nearby town of Diss, which has a full range of services and facilities. This shows that future residents will not be reliant on a personal car.

The development directly to the south was granted planning consent in October 2020 for the construction of 9 homes under planning reference DC/20/00324. When evaluating this application, it was found that the location was sustainable and that the development would complement the village. The suggested site to be included within the settlement boundary shares the same benefits as this permission which sets a precedent that this location is suitable for housing. Whilst this site

is closely related to the 9-home development to the south, it is under separate ownership and will be developed independently of the 9-home scheme. This access is shared with the larger development of 9 houses to the south and it has been confirmed by Suffolk Highways that this access is safe and suitable for residential use.

A tree survey has previously been undertaken on the site. This survey confirmed that the trees currently on site comprise overgrown remnant domestic planting, mostly made up of Layland Cypress, and other trees which are not considered to offer special merit and are of low landscape value. These can be replaced with new native trees and shrub and hedge planting which will have a positive impact on the landscape and will also have an ecological benefit.

An ecology assessment of the site has also been undertaken in the past. This report confirmed that the development of the site will not result in any significant ecological impacts on any protected or notable species and that no cumulative effects are anticipated. Biodiversity enhancements could secure a 10% biodiversity gain across the site. The triangular area to the east of the site would lend itself well to this purpose.

There are clear benefits from this land being included within the settlement boundary such as:

- The land is in a sustainable location, within quick walking distance to a local shop, within easy cycling distance to Wetheringsett and Mendlesham, and a short bus journey to Diss.
- The development of this land will make a positive contribution towards enhancing and maintaining the vitality of the local community of Brockford Street.
- Any new residential development will be discretely situated among other houses and will complement the character of the area without impacting the amenity of neighbouring properties or the character of the wider area.
- Any development would likely be undertaken by a local builder, providing a local economic benefit. The future residents of the house will support local services and facilities and will make a long-term contribution to the local economy.
- The development of this land represents a sensible use for this awkwardly shaped piece of land. If it is not developed for housing as proposed, there will be no viable use for this land which has previously been used to store building supplies.
- The development will include removal of poor quality, overgrown domestic

planting and its replacement with native hedges and trees which will have a positive impact on the landscape.

- The investigation of onsite contamination and mitigation if required will address any existing pollution which would otherwise not have been addressed.
- Implementation of biodiversity enhancement measures which will create at least a 10% biodiversity net gain on the site.
- Development of the land could be brought forward as self-build housing units.

Proposed Update to the Wording of Policy WCB1: Location of New Housing

These representations also suggest a change to the wording of draft Policy WCB1. The wording of this policy currently states that:

“The focus for new development will be the defined settlement boundaries at Wetheringsett (Church), Brockford Street and Wetherup Street/Park Green as shown on the relevant policies maps.

New or windfall development within these defined settlement boundaries should be small-scale (meaning individual houses or small grounds and proposals should enhance the area’s form, character and setting...”

These representations suggest that this draft policy is updated to allow small-scale windfall development within and adjacent to the settlement boundary. There are very few locations within the proposed settlement boundary which allows infill development. Allowing small development adjacent to the settlement boundary will allow a small number of minor developments to come forward which will provide housing for local people which would otherwise not be developed over the Neighbourhood Plan period. Allowing the conditions for the development of a small number of houses reduces the need for larger sites to be allocated later and provides housing for local people.

As such these representations suggest that the wording of policy WCB1 is updated as follows:

“WCB1: Location of new housing

The scale of new housing within the parish during the plan period will reflect its position within the adopted Local Plan settlement hierarchy

*The focus for new development will be **within or adjacent to** the defined settlement boundaries at Wetheringsett (Church), Brockford Street and Wetherup Street/Park Green as shown on the relevant policies maps.*

*New or windfall development within **or adjacent to** these defined settlement boundaries should be small-scale (meaning individual houses or small grounds and proposals should enhance the area's form, character and setting and not have significant adverse*

impacts upon:

a) Heritage assets (designated or undesignated)

b) Nature conservation interests

c) Highway safety or public rights of way

d) the amenity of adjoining occupiers, or

e) other identified constraints (e.g. flood risk, water and wastewater supply).

New developments should actively seek to facilitate walking and cycling.

*Proposals for development located outside of, **and not adjacent to**, the defined settlement boundaries, will only be permitted where they are in accordance with adopted national and local policies, they comply with criteria a-e above and where they would not result in the erosion of undeveloped gaps between the distinct hamlets.*

Development may only be supported where no likely significant effects (LSE) or adverse effects on site integrity (AEoI) have been demonstrated through an individual project-level HRA"

We trust that this is sufficient for you to consider these proposed changes to the draft Neighbourhood Plan and we look forward to hearing from you further regarding this land.

Yours sincerely

SAM STONEHOUSE
SENIOR PLANNER
EVOLUTION TOWN PLANNING LTD

(13) Response from Wetheringsett cum Brockford Parish Council

Wetheringsett cum Brockford Neighbourhood Plan – REG16 Consultation

Comments by Wetheringsett cum Brockford Neighbourhood Plan Steering Group (WCBNPSG) on REG16 representations – 16th May 2024

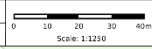
Serial	Respondent	Wetheringsett cum Brockford Neighbourhood Plan Steering Group comment
1	Suffolk County Council	<ul style="list-style-type: none"> • Policy WCB6 Design – No objection to updated reference to Suffolk Guidance for Parking being included in the policy.
2	Mid Suffolk District Council	<ul style="list-style-type: none"> • Chapters 1-6 – No objection to inclusion of proposed minor update/corrections • Chapter 7 and WCB10: No objections to proposed changes. • WCB11: No objection to removal of the final sentence although we note some examiners have retained it. • Chapter 8, 9 and Appendices A-E: No comments • Inset Map A- Brockford Street : No objection to proposed mapping amendment. • Inset Map B: Wetheringsett Church – The preference is for this site to remain outside of the settlement boundary until it has been constructed. Once constructed any relevant review of the NP or LP could include it within the SB in the future. However, should the Examiner be minded to include the site within the settlement boundary, then the QB would not make further objections. See also comment made in respect of Evolution TP representation at 11.
3.	Mendlesham Parish Council	Comments noted
4.	Natural England	Noted
5.	Suffolk Wildlife Trust	Comments noted
6.	Historic England	Comments noted
7.	Environment Agency	Comments noted
8.	Anglian Water	Support noted
9.	National Landscape team (Dedham Vale and Suffolk Coast and Heaths)	Comments noted
10.	National Highways	Comments noted.
11.	Evolution Town Planning on behalf	There have not been previous consultation responses made on behalf of this landowner to previous stages of the Neighbourhood Plan.

	of D I Alston Will Trust	See response to MSDC representation at 2 above. 4
12.	Evolution Town Planning on behalf of Mr Ribbons	<p>There have not been previous consultation responses made on behalf of this landowner to previous stages of the Neighbourhood Plan.</p> <p>Please see MSDC representation. It is believed that the settlement boundary amendment requested, lies outside the parish boundary and therefore the Neighbourhood Area for this Neighbourhood Plan. Please see extract from parish online below which shows the parish boundary as a blue line. Land outside of the parish is 'toggled off' and is therefore less defined.</p> <p>In addition, even if the site in question did fall within the Neighbourhood Area, the QB is not minded, to amend the settlement boundary to include this site for future development. The results of public consultation during the evolution of the Neighbourhood Plan have not indicated a strong desire to include further land for development above and beyond that already committed in the parish. Furthermore It is considered that development in this location would result in further traffic movements in Griffin Lane and onto the A140 which is a key highway safety concern of the local community.</p> <p>The QB does not agree with the suggested wording amendments to Policy WCB1 which seeks to allow small scale windfall development outside of but adjacent to settlement boundaries. The QB consider that this would set a dangerous precedent which could allow for further housing development in the parish in unsustainable locations, which is not supported by the community consultation undertaken to date. The policy has been drafted to be clear on the limited circumstances in which development outside of defined settlement boundaries can take place and this is consistent with NPPF paragraph 84 and Adopted Local Plan Policy SP03. The proposed amendment is therefore not supported</p>

Wetheringsett-cum-Brockford

Author:

Date: 08/05/2024



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