
Wilby neighbourhood plan

Site Heritage Impact Assessment

Site H1 – Land east of Stradbroke Road, Wilby



July 2020

Introduction and Neighbourhood Plan Context

- 1.1 The Wilby Neighbourhood Plan covers the civil parish of Wilby in Mid Suffolk District. The REG 14 Pre-Submission Version of the Plan was the subject of consultation with statutory consultees and members of the public between 22nd January 2020 and 12th March 2020.
- 1.2 The Wilby NDP includes an allocation for 5 dwellings east of Stradbroke Road.
- 1.3 In February 2020, Mid Suffolk District Council commissioned independent consultants Land Use Consultants (LUC) to produce the Strategic Environmental Assessment (SEA) Screening Report to support the emerging Neighbourhood Plan. Mid Suffolk undertook the required consultation with the three Environmental bodies – Environment Agency, Historic England and Natural England during late February and mid-March 2020.
- 1.4 The Environment Agency and Natural England both raised no objections either to the REG14 Consultation or to the SEA Screening.
- 1.5 Historic England did not raise any objections during the REG14 consultation **but did raise submit concerns in respect of the SEA Screening Report :**

“The documentation indicates that the Wilby Neighbourhood Plan proposes to allocate a site for housing to on the north east side of the village, to provide 5 residential units. The Site currently affords excellent views of the Church of St Mary, which are an important part of how this heritage asset is experienced in its setting and contributes to its significance. These views may be disrupted by the development of the site. As the National Planning Policy Framework makes clear, heritage assets are an irreplaceable resource, the significance of which should be conserved for future generations. Paragraph 185 requires that Plans (including neighbourhood plans) should set out a positive strategy for the conservation and enjoyment of the historic environment. Paragraph 190 sets out that the significance of heritage assets can be harmed through development in their setting. The NPPF also requires that great weight is given to the conservation of heritage assets, and that the more important the asset, the greater that weight is.

Given the likely significant effects upon the historic environment, Historic England hence considers that a Strategic Environmental Assessment will be required to assess the potential impacts of the site’s development and provide conclusions as to any necessary mitigation required to avoid or minimise the harm to the significance of the Church of St Mary. We would suggest, in order to ensure that the SEA is proportionate and not overly onerous in terms of the resources required to complete it, that the SEA and its supporting evidence is tightly focused on this question”.
- 1.6 Discussions between the Wilby Neighbourhood Plan Volunteer Group, Historic England and Mid Suffolk District Council during April resulted in a combined agreement that the issue of impacts from the proposed development on the

setting of St Mary's Church could be satisfactorily explored through a Site Heritage Impact Assessment rather than a full SEA.

- 1.7 This document acts as the required Site Heritage Impact Assessment in respect of the proposed allocation East of Stradbroke Road.

Heritage Policy Context

- 2.1 Paragraph 190 of the National Planning Policy Framework (NPPF) states that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 2.2 The NPPF goes on to say at paragraph 193 that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 2.3 In this case the scope of the Site Impact Assessment is well defined in that Historic England's concerns relate to potential impacts on the setting of the Church and there is an acknowledgement that the development of the proposed site for 5 dwellings would not have direct physical impacts upon the Church building itself.
- 2.4 The following Site Heritage Impact Assessment is based upon Historic England's (2015) guidance in 'The Historic Environment and Site Allocations in Local Plans – Historic England Advice Note 3' and 'The Setting of Heritage Assets – Historic England Good Practice Advice Note 3 (Second Edition – December 2017).
- 2.5 The following Site Heritage Impact Assessment is split into 5 separate parts as follows:

Step 1: Identify Heritage Assets Affected

Step 2: Understand the site contribution to the significance of the asset(s) identified

Step 3: Identify the impact of potential site allocation on the significance of the asset(s)

Step 4: Consideration of maximising enhancements and mitigating harm

Step 5: Conclusion and policy implications.

Wilby

- 3.1 **Wilby** is a village and civil parish in the Mid Suffolk district of Suffolk in eastern England located around 9 miles (14 km) south-east of Diss and 1.25 miles (2 km) south of Stradbroke along the B1118. The population of the parish at the 2001 census was 231 and had risen slightly to 239 by 2011.
- 3.2 The name of the village is generally believed to be derived from the Old English meaning 'Ring of Willows'. The village is mentioned in the Domesday Book at which time it had a small population of around 7 households and formed part of the holding of Bishop William of Thetford
- 3.3 Wilby still largely consists of three main points of development - a small centre around the church and school, and further clusters at Cole Street and Wilby Green. Secondary settlements also exist at Russell's Green and Foals Green. There are 30 buildings and structures within the parish of Wilby that are included on Historic England's National List. These range from the Church of St Mary which is listed Grade I, Wilby Hall and Wilby Manor both Grade II and a number of Grade II Listed farmhouses such as Rectory Farmhouse, Church Farmhouse and Foals Green Farmhouse. Wilby Hall is of interest due to its 16th century intact medieval moat.
- 3.4 There is no Conservation Area in Wilby. There is a small cluster of listed cottages close to the church at the centre of the village in Church Road and these include the former Swan Public House.
- 3.5 According to the Suffolk Historic Environment Record there are 33 records of archaeological interest including 6 moats and 3 historic greens. The number of moats is a significant feature in Wilby and evidence of them is still evident today in particular Wilby Hall, a Grade II listed building, is a 16th-century farmhouse with an intact medieval moat.

Neighbourhood Plan Allocation

- 4.1 The REG14 Version of the Wilby Neighbourhood Plan was the subject of public consultation between January and March 2020. Previous public consultations had also taken place in November 2018 and March 2019 when public exhibitions were held at earlier stages of the Neighbourhood Plan process.

4.2 The REG14 version of the plan proposes the allocation of a site for 5 dwellings East of Stradbroke Road in Wilby. The allocated site was a result of public consultation exercises and is supported by the local community.

4.3 The reasons for allocating this site were:

- 1) The site was supported for development through the community consultation undertaken to date. It was not identified by the local community as an important view or local green space.
- 2) The site is immediately adjacent to existing new development at Church Close and indeed could be configured to allow for shared footways with existing development. A new footway between this site and the adjacent development would benefit a number of dwellings not just the proposed site and improve its connectivity to the rest of the village.
- 3) The site was considered to be the least likely option to constitute a significant landscape intrusion when compared against other sites. The view towards Stradbroke Road from Worlingworth Road and vice versa are the two most valued views by the local community.
- 4) The site's southern, eastern, and western boundaries are easily definable on the ground.
- 5) The site layout can be configured not to detract from existing views of the Church as the adjacent development has already achieved.

WIL6

Housing Allocation – Site H1 – East of Stradbroke Road

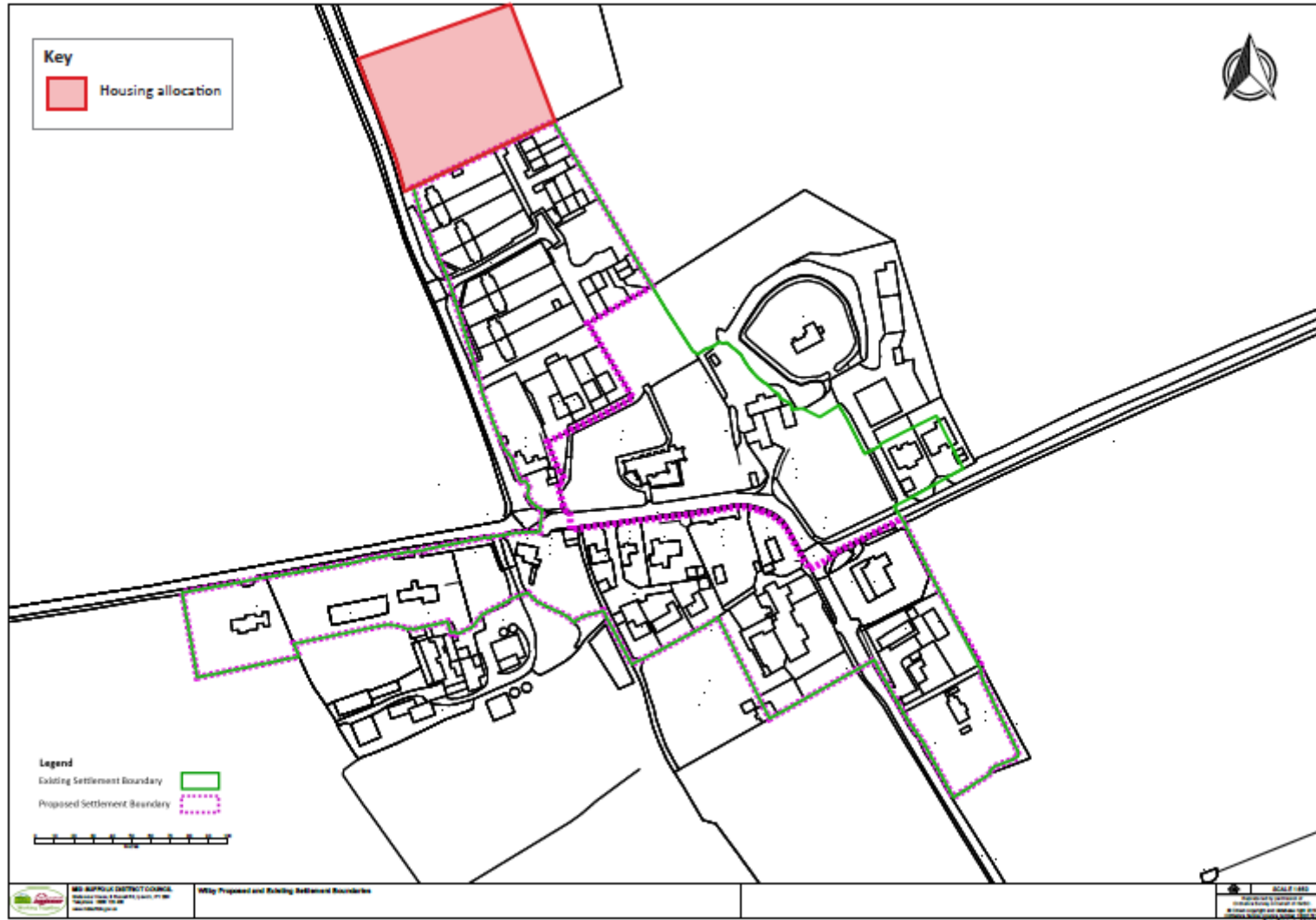
A site as shown on the Policies Map, east of Stradbroke Road is allocated for 5 dwellings.

Detailed proposals for this development should include the following:

- i) Access from Stradbroke Road;
- ii) Appropriate screen planting of a type to be agreed on the northern, southern and eastern boundaries; with a minimum 5m landscape buffer on the northern boundary
- iii) Dwelling layout to be set back from the road and configured to retain existing views of the church from the north
- iv) The housing mix e.g. size and type of dwelling provided will be in accordance with **Policy WIL7**
- v) A footway connection to link the site with the rest of the village will be provided which also connects with the adjacent built development.

See Map E

Map E - Housing allocation Site H1



Assessment – Land East of Stradbroke Road, Wilby

Methodology

Step 1: Identify Heritage assets affected

- i) An initial desk based assessment of statutory designations and historic maps to identify heritage assets (designated and non-designated) ¹ within adjacent to or in the proximity of the site allocation
- ii) Site survey and photographs to understand the context of the assets identified and relationship (if any) to the site

Step 2: Understand the site’s contribution to the significance of the heritage asset(s) identified

- i) Describe the significance of the heritage assets and any contribution made by their setting, using the guidance set out in :
 - Historic England 2008 “Conservation Principles, Policies and Guidance: For the Sustainable Management of the Historic Environment”
 - Historic England (2015) “The Setting of Heritage Assets – Historic Environment Good Practice advice in Planning 3”
- ii) Summarise the significance of the heritage assets and its setting – very high/high/medium/low/negligible/none
- iii) Describe and summarise the contribution the site makes to the significance of the heritage asset – very high/high/medium/low/negligible/none²

Step 3: Identify the impact of the site allocation on the significance of the heritage asset(s)

- i) Consider any direct impacts on the significance of the heritage asset (s) as a result of the site allocation
- ii) Consider any impacts upon the setting of the heritage asset(s) as a result of potential site allocation
- iii) Identify the level of harm to the significance of the heritage asset (s) – major, moderate, minor negligible, no change³

¹ Designated heritage asset – World Heritage Site, Scheduled Monuments, Listed Buildings, Conservation Areas, Protected Wreck Sites. Registered Battlefields, Registered Parks and Gardens

Non Designated heritage asset – a building, monument site, place or landscape which is identified by the local planning authority as having a degree of significance in meriting consideration in planning decisions due to its heritage interest. This can include local listing.

² See Appendix 4 for definitions

³ See Appendix 4 for definitions

Step 4: Consider maximising enhancements and mitigating any harm

- i) Consider what enhancements to the local historic environment could be achieved through the potential site allocation (e.g. increase public access and understanding of the heritage asset(s), contribution to the regeneration of heritage asset(s), better reveal the significance of assets).
- ii) Consider ways to mitigate any harm to the significance of the heritage asset through the site allocation (e.g. amend the site boundary, relocated development within the site, identify design requirements and address any infrastructure issues)

Step 5: Conclusion and Policy Implications

- i) Determine whether the site allocation is appropriate in the light of the NPPF's tests of soundness
- ii) Make recommendation for enhancing and/or mitigating harm in the historic environment
- iii) Conclude whether the site allocation will reflect the national policy i.e. will it conserve heritage assets in an appropriate manner to their significance.

SITE NAME: Site H1 LAND EAST OF STRADBROKE ROAD, WILBY

IDENTIFICATION OF HERITAGE ASSET(S)	
Heritage Asset	Description of Asset (s)
Listed Building	Church of St Mary – G1 – (ref: 1181714)
Scheduled Monument	None
Conservation Area	None
Registered Park and Garden	None
Non-designated	None
Significance of the Asset and the Site's Contribution to that significance	
Name of Asset	Significance of the asset (heritage values and the setting, physical surroundings and experience of the asset)

Church of St Mary	<p>The Church is a Grade I Listed medieval Parish Church consisting of Nave, chancel, south aisle, west tower, south porch, north vestry. It is constructed of flint rubble with stone dressings and leaded roofs. The west tower is a C15 square tower in 3 stages, with a crenellated parapet, plinth, buttresses and parapet enriched with flushwork and a moulded west doorway with shield-carved spandrels. Above is a frieze of flushwork and a 3-light window flanked by empty canopied niches. There are 2-light belfry openings and a C15 4-bay nave with 3-light windows.</p> <p>The Church's significance within the context of Wilby parish is high. Its significance is derived from its cultural, historical and religious value as a parish church and is reflected in its Grade 1 Listing. Its age and physical location at the centre of the village reinforces this significance and the tower acts as a focal point in the landscape sitting above the rest of the village and acting as a guide for those travelling to Wilby. The Church sits at the heart of a cluster of 6 other listed buildings (all Grade II) in the core of the village where key routes from Stradbroke, Brundish, Worlingworth and Laxfield converge.</p>
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Setting of the Church

The immediate setting of the church can be reasonably concluded as comprising the church yard plus that part of Church Road which flanked the parish church. The immediate setting of the church is very closed and small scale in nature. Three sides comprise dense woodland and shrubland set around a churchyard.



Church and churchyard as viewed from Church Road (south elevation)

To the immediate north and west of the Churchyard are The Old Swan (Early 15thC Grade II) and 4 unlisted mid-19th C cottages. Immediately to their north is Church Close (a mid 20th C development of 8 former council houses set out in semi-detached pairs and strung out along Church Road/B1108/Stradbroke Road).



Churchyard looking north west towards The Old Swan and Church Cottages



Church looking north and west (eastern elevation)

The density of the planting is such that there is little intervisibility between the church plus churchyard and the surrounding fields. There is no intervisibility between the proposed allocation and the Churchyard/Church Road.



Churchyard (looking north east)



Churchyard looking north east

The fourth side (southern) comprises a row of dwellings on the opposite side of Church Road – one of which is listed Grade II - Church Cottage (one dwelling formerly 3).



Old Church Cottage, Church Road facing east, Church and Churchyard located behind trees



Church and churchyard from Church Road (looking north)

From the south:

Views of the tower on the approach to Wilby from the south (Brundish Road) provide a clear view of half to two thirds of the tower rising above the dense tree cover that surrounds the Churchyard. The approach to the village from this direction was identified by local residents during the early consultations on the emerging Neighbourhood Plan, as an important view and is identified for protection under Policy WIL2.⁴



Long view of Church Tower from the south (Brundish Road)

⁴ See Appendix A for Policy WIL.2



View from south (Brundish Road)

From the east:

Views from the east along London City Road towards the tower are more obscured – firstly by the agricultural outbuildings that mark the eastern boundary of Church Farm and then by the two modern dwellings known as Mayfair and Belgravia permitted in 2014. Approaching Wilby from this direction, you will be almost at the foot of the tower on Church Road before you can really see it. There are long views of the tower from this direction but again no short views of the church building itself due to the enclosed nature of the Churchyard and the height of the trees.



View towards Church tower from east along London City Road

Views of the tower from this direction are intermittent rather than wholly consistent. The approach to the village from the east along London City Road was identified by residents as an important view, not specifically due to views of the Church which are limited in this direction, but as an attractive approach to the village and it is identified for protection under Policy WIL.2

From the west:

Views towards the Church Tower from the West (Worlingworth Road) were identified by local residents as one of the most important views in the village and it is duly protected under Policy WIL.2. Views from this direction offer the most complete views of the tower with only its base obscured by the outbuildings of The Old Swan. However, the remainder of the Church is still not visible until you reach Church Road.



View of Church tower from west (Worlingworth Road)



**Long view of Church from west
(from Worlingworth Road. Note Church Close properties fronting B1118 in the left of the photograph)**

From the north:

Views from the north towards the church consist of the upper third of the church tower set amongst trees and the roofs of more modern development below. There are long views of the tower across rear gardens and between properties fronting the B1118 at Church Close and the more recent properties that comprise the Orwell development which make a channel/frame for the view. A rear garden tree on the boundary of the proposed allocation makes a distinctive landmark in the landscape here. There are long views towards the tower here from Stradbroke Road but as you approach the village the view becomes oblique and the dominant structures in the landscape become the Church Close fronting the B1118 and the new development to properties the rear. There are no views of the base of the tower or the remainder of the church building itself from this direction. The view is dominated by the red roofs of the existing development which forms the edge of the settlement.

This approach to the village was not highlighted as important by local residents in early consultations on the emerging Neighbourhood Plan, partly due to the presence of the existing development. Indeed, other views into the village are less (or not at all) compromised by recent development than in this location. Views from the north looking west across fields towards Worlingworth Road were identified as important and are identified for protection in Policy WIL2.



Long view of Church tower from the north (B1118) glimpsed above existing development

Summary of significance

The church of St Mary is of high significance, as is reflected by its Grade I listed status. Its structure has an intrinsically high level of evidential value associated with its surviving medieval and later fabric, as well as associated archaeological potential commensurate with its status as a parish church and burial place over the centuries. Its historical value relates to its status as the parish church of Wilby and consequently as the symbolic heart of the village and wider parish community

over the centuries and its position as a dominant feature in the landscape. The aesthetic value of the church is derived from its fine fifteenth century architectural form and detailing, as well as that of interior features such as the font, pulpit and pews. Its communal value relates to the intangible value placed on it by the local community, who appreciate it as a focal point in views of their village, who enjoy the peaceful green space provided by the enclosed churchyard, and identify it as a place of celebration or commemoration, and of course religious observance.

SITE CONTRIBUTION TO THE SIGNIFICANCE OF THE ASSET

The proposed allocation site is located to the north west of the settlement of Wilby and consists of part of a wider agricultural field in active agricultural use.

The proposed allocation is approximately 0.6ha in size and is rectangular in shape. The site is allocated for around 5 dwellings. The southern boundary of the site is marked by the existing development comprising 8 post-war former council owned residential dwellings (4 x 2) pairs of semi-detached dwellings) fronting onto the B1118 (Church Close) with long rear gardens.

Behind them, to the south west of the allocation site, is a small modern development comprising 10 new affordable dwellings permitted in 2014. Access to this development is via, a short access road, which runs centrally between the existing line of residential dwellings fronting Church Close.

The western boundary of the proposed allocation site is the B1118 and there are no currently definable boundaries on the ground that would comprise the eastern and northern boundaries. However, the eastern boundary is demarcated by continuing the current rear boundary of the newest development at Church Close.

The proposed allocation is approximately 200m (as the crow flies) from the Church which sits to the south of the site

Intervening development consists of the two developments at Church Close, referred to above and Church Cottages which are 4 small semi-detached cottages laid out in two blocks facing the church, immediately adjacent to the northern boundary of the Churchyard. There is also a mature tree screen marking the boundary of the Churchyard.

There are no inter-visible views between the proposed allocation site and the Church building itself at ground level. There are few views of the Church enceinte itself from any direction.

The only views to or from the proposed allocation involve the Church Tower which gives the Church its significance as a prominent feature in the landscape. The Church tower acts as a landmark feature in the wider landscape marking the centre of Wilby and is visible from distance in every direction. The tower sits above the mature, well treed churchyard and it is the wider setting of the tower within this landscape that warrants the greater significance within the context of development on settlement edges. The Church tower however is visible from the centre of the allocation site across the intervening development.

The proposed allocation site is highly visible as the main approach to the village from the north (from Stradbroke). It's undeveloped and open nature affords views across the rear gardens of Church Close and up towards the top of the church tower.

The site in its current undeveloped form makes a minor contribution to the significance of the building through its setting and the views towards the church from the north, however the setting is narrow in character and disturbed by other features such as the tree cover and development edges/roofs. In addition, there are no known historical or cultural relationships between the church or parochial bodies and the site of the allocation.

POTENTIAL IMPACT OF THE ALLOCATION ON SIGNIFICANCE

	Description of Impact
Name of Asset	<ul style="list-style-type: none"> • Location and siting (e.g. proximity, extent, topography, key views) • Form and appearance (e.g. prominence, massing, scale and materials) • Secondary effect increased traffic movements, vibration, noise, lighting, access and use of landscape)
Church of St Mary	<p>It is acknowledged by Historic England, in correspondence, that there is not an objection to the principle of development in this location but that the potential impacts of the form of the development of the site on the setting of the church need to be considered in detail with the potential for safeguarding measures and mitigation to be included in the Neighbourhood Plan policy.</p> <p>Given the distance between the site and the Church and the intervening development there are no direct physical impacts on the church building itself. The proposed allocation does not physically relate to the Church – there is intervening development comprising of Church Close, new Church Close and other development in between e.g. Church Cottages, and a substantial screen of greenery that is the churchyard, with its heavily treed environs provide a setting for both the whole church and for the tower and further one not disturbed by the proposed development. Given the enclosed and close nature of the well treed churchyard the immediate setting of the church again will not be affected by development on this</p>

site. It is therefore concluded that the development of the proposed allocation would result in no direct harm to the significance of the church or the churchyard.

There is however a potential for development on the site to impede views of the church tower when approaching Wilby from the North. When leaving Stradbroke using the B1118, Wilby Church tower is just visible in the distance – the earliest point it can be viewed is at the bend on the B1118 approximately 200-185m from the northern boundary of the proposed site and approximately 400m from the Church. From that point the church tower is visible across the site frontage when looking up, between the trees and the rear of the properties fronting Church Close. By the time you reach the northern boundary of the site where it meets the B1118, the church tower has disappeared beyond the chimney pots and roof of No18 Church Close. There is therefore approximately an interval of 185m of Stradbroke Road when the church tower is visible across the site frontage.

The northern edge of the settlement currently comprises a mature hedge with a single notable tree, along the boundary in the rear garden of No18 Church Close There is also another significant tree in the rear garden of No15 Church Close.

The view up to the Church Tower from the north is not a wide open panoramic view but instead a relatively narrow ‘visual channel’⁵ framed by the rear of Nos 15 and 16 Church Close on the western side and the position of the two trees referred to above on the eastern side. The view is looking upwards towards the top half of the tower (rather than looking across the site at ground level) and is largely across rear gardens.

The Church tower sits behind and just above, the rooftops of Church Cottages and further behind the mature trees on the edge of the Churchyard. Furthermore, the positioning of the two trees acts to screen the eastern most corner of the tower and partly occludes and softens the views. The views across the proposed allocation site are currently open and unimpeded however , the entire view towards the tower is not unobscured or unimpeded and consists of visual interruptions such as the rear and side elevations of properties fronting the B1118, rear garden trees, the rooftops of Church Cottages and the treed edges of the church yard.

The form, development, scale and appearance of development on the site will be important here but the views are looking upwards towards the tower not necessarily across the site at ground level.

Development of the site for residential development has the potential to obscure the ‘visual channel’ (demarcated between the rear elevations of 15 and 16 Church Close and the trees in the rear gardens of 15 and 18 Church Close) which provides views of the church tower on the approach to Wilby from the north (from Stradbroke). Any development along

⁵ See Appendix 2 for Map identifying the visual channel to the church tower

the road (western) frontage of the site would be located within this 'visual channel' at the frontage of the proposed allocation and would therefore block existing views of the Church from the north.

The development of the site has the potential to obscure of views of the church tower form the northern approach to the village and development within the identified 'visual channel. would reduce the significance of the setting of the church tower, which is currently visible (in part) from all directions, resulting in a minor level of harm to the overall significance of the church.

Secondary impacts e.g. noise, lighting etc are unlikely to be severe given the intervening development and distance from the church and are considered to have no harm on the significance of the Church. However, consideration has been given in the policy to minimise these impacts, and a criterion has been included to limit the potential for light pollution and harm to the setting of the Church.

ENHANCEMENTS AND MITIGATING HARM

Maximising enhancement:

There is already public access to the Church and to the churchyard. There are few other green spaces within Wilby, and the churchyard is valued by the local community due to its historical value as providing a setting for the church but also its visual and amenity value as an accessible green space in the village.

Consequently the Churchyard is identified as a Local Green Space in the Neighbourhood Plan and is protected under Policy WIL.3⁶ The Local Green space designation provides a high degree of protection to the churchyard and the National Planning Policy Framework (NPPF 2019) indicates at paragraph 101 that 'policies for managing development within a Local Green Space should be consistent those for green belts'. Policy WIL.3 goes further than the NPPF and seeks not only to prevent development from taking place on Local Green Spaces but also seeks to control development adjacent to a Local Green Space that would adversely impact upon its special qualities.

Whilst the view towards the Church from the north was not identified through early consultation on the neighbourhood plan as an important view, the remaining views of the church from Brundish Road, London City Road and Worlingworth Road are all identified under Policy WIL.2 as important views and the policy seeks to resist development that would have an adverse impact on the landscape or character of the view will not be supported.

⁶ See Appendix 3 for Policy WIL.3

Mitigating Harm:

In assessing the significance of the setting of the church tower it has been possible to identify a 'visual channel' across the proposed allocation site that affords views up towards the church tower. It is acknowledged that this view is not un-obscured, is relatively short and only experienced publicly from the Stradbroke Road for a duration of approximately 185m north of the site until the site's northern site boundary is reached before views of the tower are then disappear behind development on Church Close . However, the view nonetheless does provide the only public long view of the northern elevation of the church tower and does contribute to the significance of the church as a heritage asset.

Development located within this channel would reduce the significance of the church as a heritage asset and therefore should be avoided. It is therefore proposed to identify a View Safeguarding Zone within the proposed allocation site which will be required to be kept free from development that would impede, reduce, obscure or interrupt the view. The area of land taken up by the Safeguarding Zone is approximately 0.056ha from an overall site area of 0.6ha and therefore is considered a sustainable and viable method of safeguarding this view. The View Safeguard Zone is shown in Appendix 2 and the requirement for this to be safeguarded will be included within the revised wording for Policy WIL.6 shown below.

The pre-submission version of Policy WIL.6 already required any new dwellings to be set back from the road and configured to retain existing views of the church from the north, however the identification of the View Safeguarding Zone will provide more specificity as to where this zone falls and will require development to be located towards the rear of the site. Identifying the View Safeguarding Zone within the policy will help to inform a the layout of any subsequent planning application and the policy also requires that due to the sensitivity of the site in terms of views of the church that any application should be made in full and not outline and be accompanied by a Heritage Statement which justifies the chosen layout in terms of heritage impacts.

The pre-submission version of the policy also required a minimum 5 m landscape buffer on the northern boundary. However due to the need to safeguard the views of the church, the requirement for a rigid 5m landscaping belt has been removed as this could inadvertently result in obscuring views to the church from certain distances, particularly if the landscaping were include the site frontage. Instead the requirement is for a soft landscaped edge to the development along the northern boundary but with scope for the site frontage to be left open.

Further consideration has been given to secondary impacts such as the potential for light pollution to be generated by the development and consequent impacts on the setting of the Church. It is proposed to include an additional criterion within the policy which seeks to control any lighting scheme associated with the development and mitigate its impacts through the use of downlighting, directional lighting and low lux/non sodium lights.

As referred to above the rationale for the selection of this site was community led and informed by the two public consultation exercises that took place in November 2018 and March 2019. The proposed application site was identified by the public as the most popular for new housing,

largely driven by the desire to protect the other views and that this part of the village had already been subject to new development which was seen to interrupt the northern approach to the village. The application site was also not identified by the community as an important view.

Alternative sites for development in the village that were put forward by local people and included land at Willow Farm, Land south of the School at Brundish Road, land west of Stradbroke Road and Land off London City Road. These were rejected on the basis of impact on listed buildings, non-designated heritage assets, landscape impacts and impacts on the form, character and setting of the village. It was considered that other views contribute more to the significance of the church.

Given the housing requirement set out by the emerging Local Plan, this site was considered the site most likely to *minimise* harm in respect of heritage and landscape impacts and is considered to represent a positive attempt to manage the delivery of the housing requirement in the parish in the most sympathetic and sustainable manner consistent with the NPPF.

CONCLUSIONS AND RECOMMENDATIONS

The proposed allocation is located on the northern approach to the village of Wilby. It is approximately 0.6ha in size and it allocates around 5 dwellings.

The development of the site will not directly affect the significance of the church building itself or the immediate church yard, due to the enclosed nature of the churchyard, its mature and well treed boundaries, the lack of intervisibility between the church, the churchyard and the allocation site, the distance to the allocation site and the presence of intervening development.

The development of the site does have the potential to affect the setting of the church tower when viewed from the northern approach to the village. Development located at the frontage of the site would be easily visible from the approach to the village along Stradbroke Road for some distance and would obscure the current views up towards the church tower currently visible between trees in the rear gardens of Nos 15 and 18 Church Close and the rear elevations of properties fronting the B1118.

The harm caused by the allocation could be mitigated through the restriction of development away from the site frontage and the identification of the View Safeguarding Zone within Policy WIL6 of the Neighbourhood Plan. It is recommended that the View Safeguarding Zone be identified on a map accompanying the policy and the policy worded to ensure that the View Safeguarding Zone be kept clear of development that would occlude, obscure or interrupt the views of the Church tower currently available through the View Channel.

It is also recommended that the policy wording should include the requirement for any application on the site for development to be made in full and not outline and that the application should be accompanied by a Heritage Statement that specifically justifies the chosen form, scale, massing and layout in terms of potential heritage impacts.

In addition the policy should also be reworded to remove the requirement for a 5m landscape buffer on the northern boundary to prevent views of the church through the Visual Channel to be obscured by landscaping and to allow the flexibility for the frontage to remain undeveloped and open. The addition of a criterion relating to minimising light pollution generated by the development and avoiding harm to the setting of the church has also been considered necessary.

The Church, its tower and churchyard both together and separately from a significant heritage asset namely the building and its setting. The proposed allocation with the safeguards set out in the policy are considered to have avoided or minimised harm to the significance of the setting of this fine parish church, its tower and the churchyard itself.

Appendix 1

Revised Policy WIL.6

WIL6

Housing Allocation – Site H1 – East of Stradbroke Road

A site (0.6ha) as shown on the Policies Map, east of Stradbroke Road is allocated for around 5 dwellings.

Detailed proposals for this development should include the following:

- i) Access from Stradbroke Road; which should be designed to ensure that any proposed junction infrastructure and footway design respect the rural character and edge of village location rather than employ a standard design; the use of very urban form of tarmacked pavement and concrete kerbs along the edge of the road should be avoided with a preference for a softer and more rural appearance.
- ii) Appropriate screen planting using predominantly native species of a type to be agreed on the northern, southern and eastern boundaries; with a soft well landscaped edge on the northern boundary
- iii) The View Safeguarding Zone as identified on Map E to be kept clear of development that would occlude, obscure or interrupt the views of the Church tower currently available through the identified View Channel;
- iv) The housing mix e.g. size and type of dwelling provided will be in accordance with **Policy WIL7**
- v) A footway connection to link the site to the existing footway on Church Close, which will allow for a safe route to the rest of the village including the school.
- vi) A lighting scheme which maximise the use of downlighting low lux/non-sodium lighting in order to minimise light pollution and avoid harm to the setting of the Church,

Outline applications will not be supported and full details of the proposed layout, building heights, landscaping etc will be required at application stage in order to safeguard the setting of the Church.

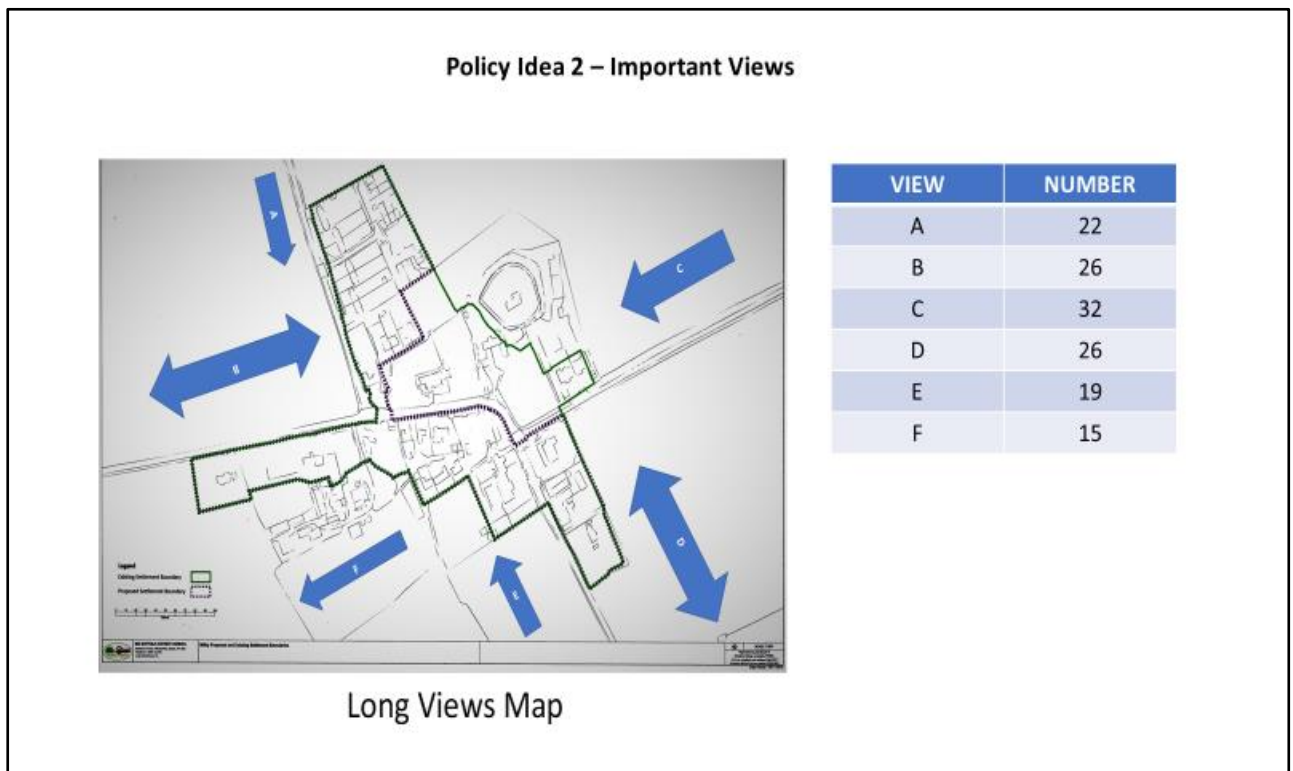
Applications for development on this site will be expected to be accompanied by a Heritage Statement that specifically justifies the chosen layout in terms of potential heritage impacts.

See Map E

Map E – View Safeguarding Zone



Appendix 2 – Policy WIL2 – Important Views – Extract from NDP



Results of Consultation

WIL2 Protection of important views

The following views and vistas (as shown on **Map C** and on the **Policies Map**) are identified as Important Public Local Views.

- a) Views from Worlingworth Road looking east and from Stradbroke Road looking west
- b) View looking from the east towards Wilby village along London City Road
- c) Views from the south towards Wilby and also looking from Wilby to the south along Brundish Road.

Proposals within or that would affect an important view should ensure that they respect and take account of the view concerned. Developments which would have an unacceptable adverse impact on the landscape or character of the view or vista will not be supported.



a) Views from Stradbroke Road looking west and from Worlingworth Road looking east

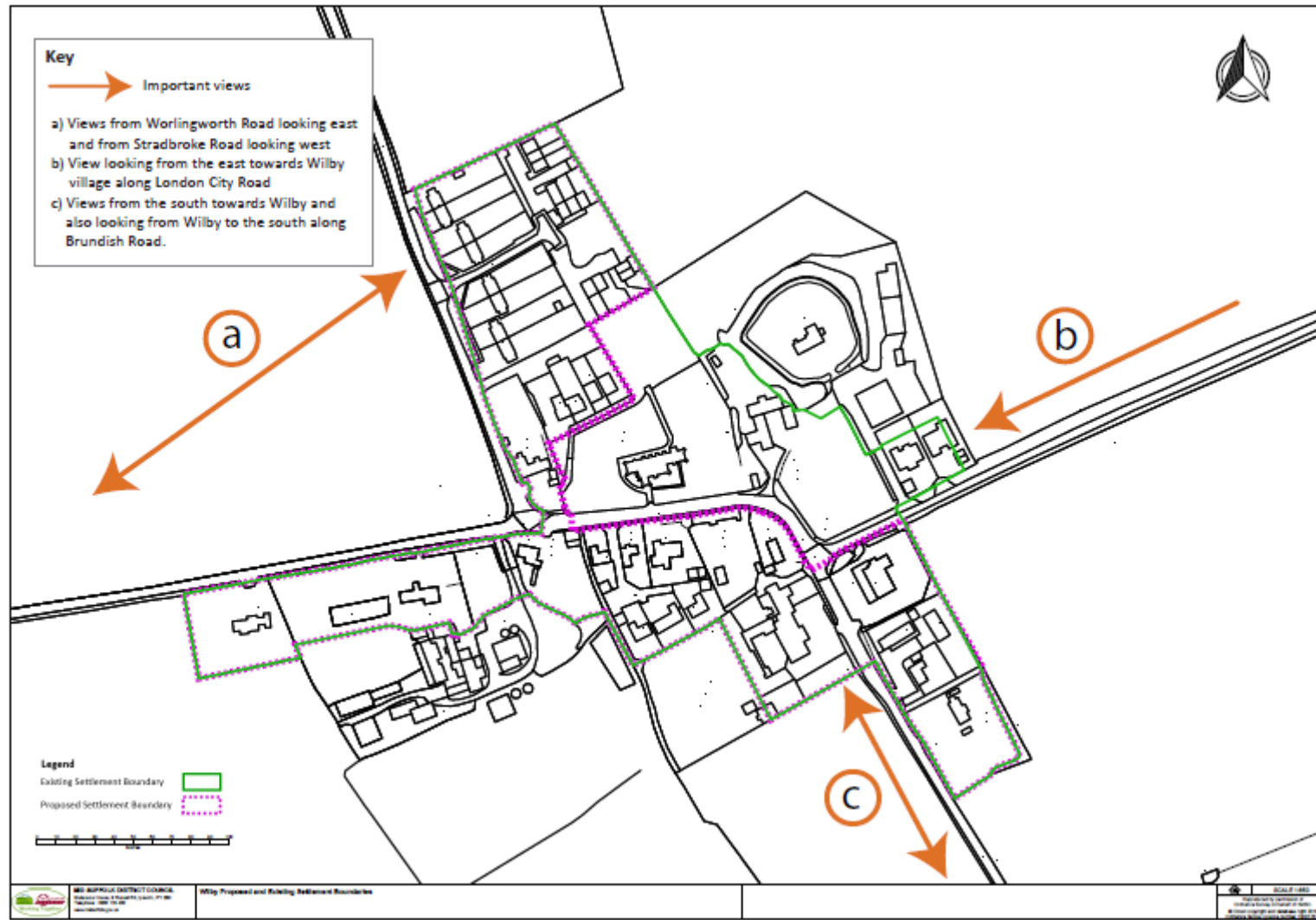


b) View looking from the east towards Wilby village along London City Road

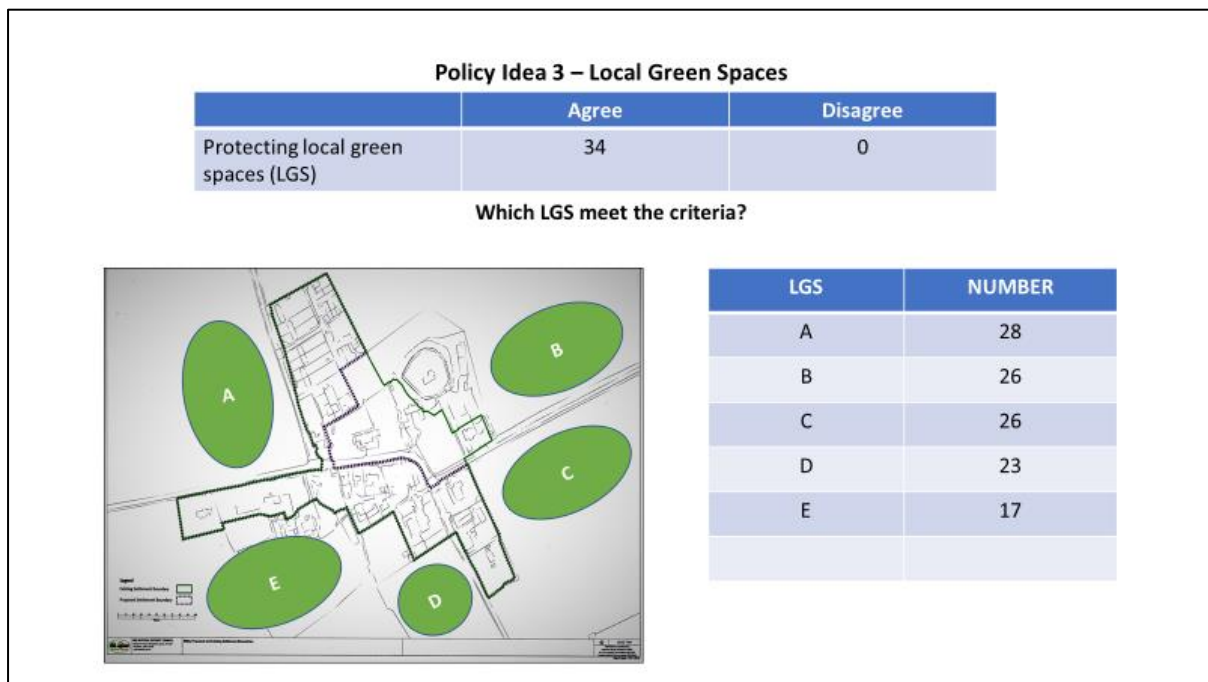


c) Views from the south towards Wilby and also looking from Wilby to the south along Brundish Road.

Map C – Important Views



Appendix 3 – Policy WIL3 Local Green Spaces – Extract from NDP



6.18 On reviewing the consultation results from this exercise, each of the spaces was assessed independently against the NPPF criteria by the Volunteer Group’s planning consultant. The results of that assessment are shown in **Appendix C**. The assessment indicated that none of the previously suggested spaces wholly met the criteria. The three most supported spaces could also be protected under **Policy WIL2** above in respect of important views as there was considerable cross over between the two concepts and spaces were nominated for protection under both.

6.19 The Babergh Mid Suffolk Joint Local Plan was published for its preferred options consultation at the time that the Neighbourhood Plan was being drafted and it became clear that the area around the church (including the churchyard) and the school playing field, both of which had previously been protected from development in the Mid Suffolk Core Strategy were no longer proposed by the emerging Joint Local Plan to be identified as open space. The Volunteer Group considered that these areas had some community value and could be potential Local Green Spaces, they therefore assessed them against the NPPF criteria. The results are shown in **Appendix C** and both spaces are considered to meet the criteria and are demonstrably special to the local community either for their historic and scenic value (Church), their recreational or community value (School Playing field and Forest School Field). Given that there was local support for the principle of a Local Green Space policy it is considered appropriate to include these two new spaces for protection within it.

WIL3 Local Green Spaces

The following areas are designated as Local Green Space for special protection (as shown on **Map D and the Policies Map**).

- a) Land surrounding Church of St Mary (including graveyard)
- b) Playing field associated with Wilby Church of England Primary School

Development on designated Local Green Spaces will only be permitted in very special circumstances. Development adjacent to a Local Green Space that would adversely impact upon its special qualities will not be supported , unless it can be satisfactorily mitigated.



a) Churchyard of St Mary



b) School Playing field and Forest School Field

Map D – Local Green Spaces



Appendix 4

Level of Significance	Definition
Very High	Site, Area, Building or Structure that has recognised international significance; Cultural associations with particular innovations, technical or scientific developments or movements of global significance or with particular individuals of global importance
High	Site, Area, Building or Structure that has recognised national significance; Cultural associations with innovations, technical or scientific developments or movements of national significance or with particular individuals of national significance.
Medium	Site, Area, Building or Structure that may be designated or undesignated, that has recognised regional or local significance; Cultural associations with particular innovations or developments of regional or local significance or with particular individuals of regional importance
Low	Site, Area, Building or Structure that may be designated or undesignated and has local significance; Cultural associations with particular individuals of local importance
Negligible	Site, Area, Building or Structure with little or no historical, architectural, or archaeological interest.
None	Site, Area, Building or Structure of no historical, architectural, or archaeological interest

Level of Harm/Impact	Definition
Major	Comprehensive changes such that the asset is totally altered.
Moderate	Changes such that the asset is clearly modified
Minor	Changes such that the asset is slightly altered
Negligible	Very minor changes to the setting
None	No change

