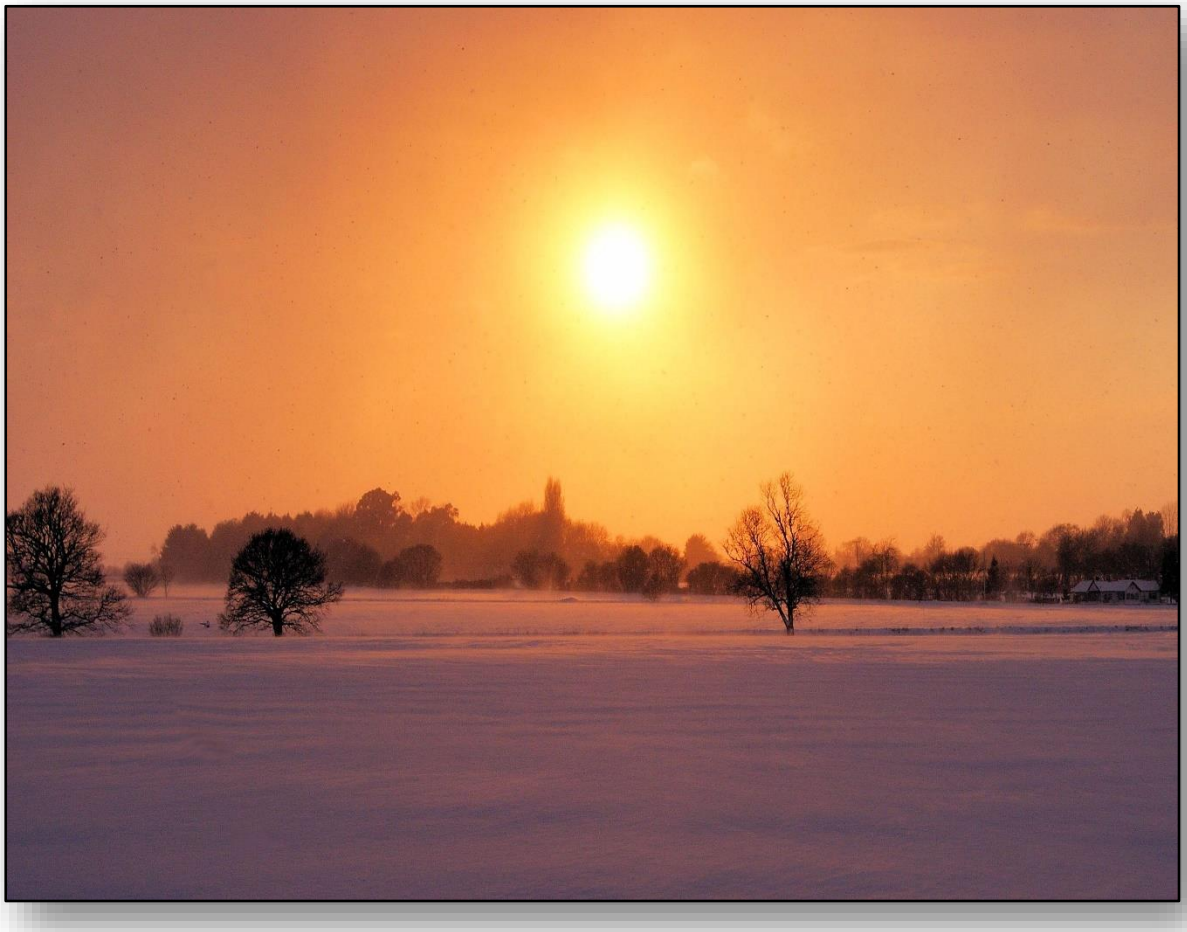
Wilby neighbourhood plan

2018-2036



Submission Version
July 2020

Contents:

1: Introduction

1.1 The Wilby Neighbourhood Development Plan will provide the first ever statutory planning policy document specifically for the Parish of Wilby. Neighbourhood Plans such as this were made possible by powers contained within the 2011 Localism Act which sought to decentralise policy making to the local level and give more powers to communities and the right to shape future development where they live. It complements existing national and local planning policy by providing a specifically local level of detail attained through consultation with the local community and further research.

1.2 The Neighbourhood Plan is a community-led document for guiding the future development of the parish. It is about the use and development of land between 2018 and 2036. Once the Plan is made and adopted, Mid Suffolk District Council will use it to determine planning applications. Wilby Parish Council will use the Plan to respond to planning applications.

1.3 Commissioned by Wilby Parish Council, the Wilby Neighbourhood Plan has been developed by a Volunteer Group of local residents (see **Appendix A** for Volunteer Group members). The aim of the Volunteer Group was to establish a Neighbourhood Plan for Wilby that allows for sustainable development that meets local needs and sustains local facilities whilst protecting the local landscape and rural character of the surrounding countryside.

1.4 The Neighbourhood Plan has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012 (as amended).

1.5 The Wilby Neighbourhood Plan is not a mechanism for stopping development - it is there to ensure that development takes place in an appropriate way for the parish. It has therefore been positively prepared, and its purpose is to support and manage growth, not prevent it. In practice, higher level planning documents such as the emerging Babergh Mid Suffolk Joint Local Plan (hereafter referred to as the Joint Local Plan or JLP) [1] cannot feasibly deal with all of the issues particular to every town and village across the district, whereas Neighbourhood Plans can by providing additional details which reflect specific local circumstances and conditions.

1.6 The Neighbourhood Plan provides clarity on what will be expected from development proposals, gives prospective investors confidence in how the area will change in the future, and ensures that the impact of development is anticipated and planned for in Wilby. A Neighbourhood Plan is a significant document and will carry legal weight so that developers have to take note when considering future developments in the parish.

1.7 The draft Wilby Neighbourhood Plan, was the subject of a six-week public consultation period between 22nd January and 12th March 2020. Local residents, businesses and statutory agencies all had the opportunity to comment on the draft Plan. All comments have been collated and considered. The Plan has been amended for submission to Mid Suffolk District Council.

1.8 The table below sets out the key stages of the Neighbourhood Plan process including those currently completed and those yet to come:

NDP Stages	Timeline	Progress
Stage 1: Neighbourhood Area Designation	December 2017	**Complete**
Stage 2: Set up, evidence gathering, initial community consultation to establish key themes, Vision and Objectives	January 2018 to November 2018	**Complete**
Stage 3: Further data collection, establish policy ideas	December 2018 to February 2019	**Complete**
Stage 4: Community consultation to test policy ideas in order to draft Neighbourhood Plan	March 2019 then Plan drafting April 2019 - October 2019	**Complete**

[1] https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-preferred-options-july-2019/

Stage 5: Pre-submission consultation (REG14) on the draft plan	January 2020 to March 2020	**Complete**
Stage 6: Submission of plan to District Council and further public consultation (REG16)	**Summer 2020**	Current Stage
Stage 7: Independent Examination	Autumn 2020	
Stage 8: Referendum	Winter 2020	

Accompanying supporting documents

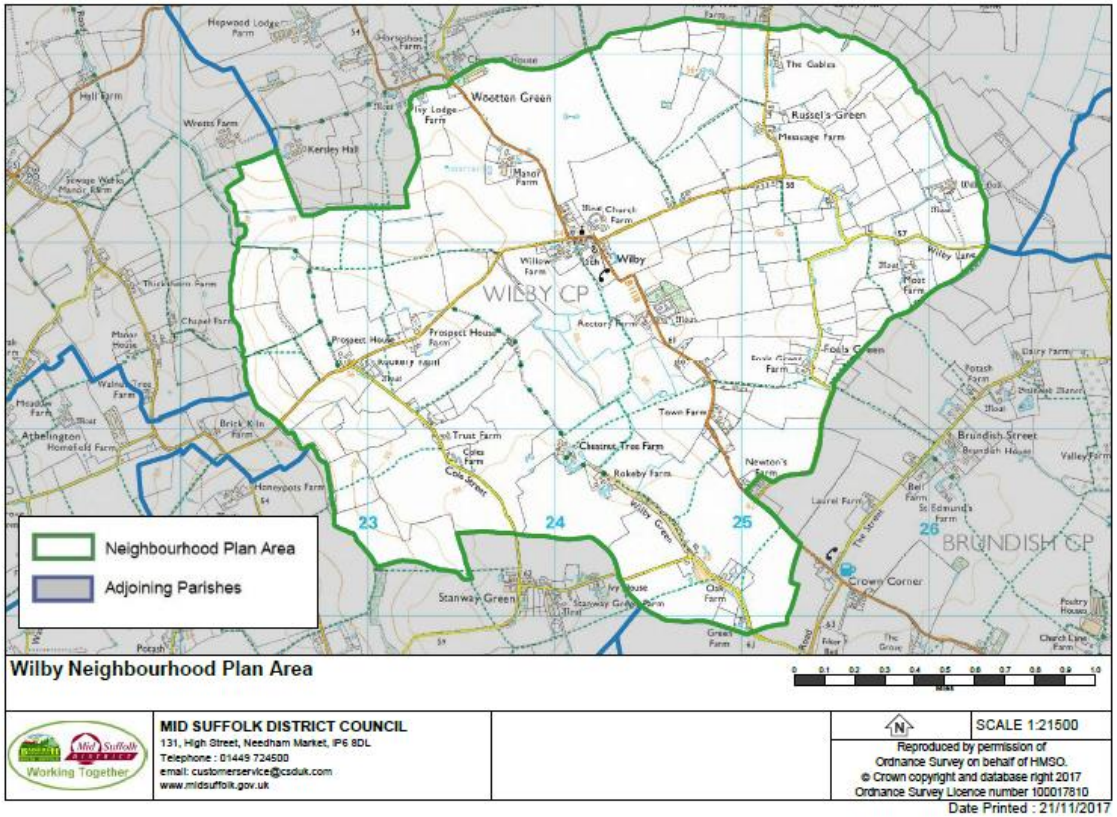
1.9 This version of the Wilby Neighbourhood Plan is submitted for independent examination, it is accompanied by the following documents:

- Basic Conditions Statement – outlines how the statutory basic conditions have been met.
- Consultation Statement – outlines how and when the public have been consulted on the content of the Plan.
- Strategic Environmental Assessment Screening Report – sets out the key environmental, economic and social issues in the plan area
- Habitat Regulation Screening Report – identifies any potential impacts on protected species or habitats.
- Site Heritage Impact Assessment for Site H1

1.10 At referendum, every resident of Wilby who is entitled to vote in the District Council elections will have the opportunity to vote on whether or not they agree with the Neighbourhood Plan. At referendum, residents will be asked, '*Do you want Mid Suffolk District Council to use the Neighbourhood Plan for Wilby parish to help it decide planning applications in the Neighbourhood area?*'. If the Plan gets at least 50 per cent support from those who vote in the referendum, the District Council will "make" (adopt) the Neighbourhood Plan as part of the statutory development plan.

1.11 The Neighbourhood Plan covers the entire Parish of Wilby and the area was formally designated by the District Council on 18th December 2017.

Wilby Neighbourhood Plan Area



2: Wilby

A brief History of Wilby

2.1 In 1870-72, John Marius Wilson's *Imperial Gazetteer of England and Wales* described **Wilby** like this:

> ***"WILBY**, a parish, with a small village, in Hoxne district, Suffolk; 6 miles ESE of Eye r. station. Post town, Stradbroke, under Wickham-Market. Acres, 1,844. Real property, £3,383. Pop., 560. Houses, 126. The property is subdivided. The living is a rectory in the diocese of Norwich. Value, £646.* Patron, the Rev. G. Mingaye. The church is Norman and good. Charities, £77."*

2.2 **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.

2.3 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. The nearest villages are Brundish, Laxfield, Stradbroke and Worlingworth. There are separate

hamlets within the parish of Foals Green, Russel's Green, Stanway Green and Wootten Green (part) which form part of the village which is dispersed in nature.

2.4 Settlement was first recorded in Wilby around 1086[2] . Suffolk County Council believe there are hints of Roman/Iron Age activity in the south of the parish, when there are records of farming activity such as pig keeping, horse breeding and poultry. Crops included barley with some wheat, rye, oats, peas, vetches, hops and occasionally hemp. By 1818, farming was changing and the choice of crops varied usually including summer fallow as preparation for corn products. By 1937 the main crops were wheat, barley, beans, peas, beet, clover and then by 1969 the land was more intensively farmed for cereal growing and sugar beet. At the start of the 19th century the population of the parish was nearly 900. However, as farming methods changed, with more and more mechanisation, it became less labour-intensive and former labourers moved elsewhere for work. As the social structure of the community changed over the next 200 years so did the topography, with hedgerows being removed to create the larger fields more suitable to mechanised farming. In modern Wilby only a minority of the population is required to run productive agriculture, but it is still essentially an agricultural community whose life is dominated by the farming seasons.

2.5 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.

2.6 Between 1908 and 1952 the village was served by Wilby railway station on the Mid-Suffolk Light Railway. The nearest operational railway station is now at Diss.

[2] Suffolk Historic Environment Record

Village Facilities

2.7 The village has some basic services including a primary school and village hall. The village **church** is dedicated to St Mary. It is medieval in origin and includes a 15th-century tower and a series of bench ends from the same century which are one of the finest collections in East Anglia. Services are held on a weekly basis under the auspices of the current vicar Rev'd David Burrell. St Mary's is a Grade I listed building.

2.8 The village **school** – Wilby Church of England Voluntary Controlled Primary School - serves around 83 children aged 5 to 11. The majority of the pupils are from the surrounding villages rather than Wilby itself. It is currently judged as 'Good' by Ofsted and has had historic links to a school in Mbauro in Kenya. At 11 children usually transfer to Stradbroke High School.

2.9 The **village hall**, which stands on the B1118, close to the centre of the village and opposite the school, is named Coronation Hall to commemorate the coronation of Her Majesty Queen Elizabeth II. Officially opened on Saturday 28 May 1955, it was one of the first village halls in Suffolk to be made by voluntary labour. The village hall is popular for activities and private functions. There is a separate bar area inside the main room, a stage and audio visual facilities. It is operated by an active Village Hall Management Committee which has bid successfully for funding in recent years and enabled the interior of the hall to undergo refurbishment.

Other facilities - Medical Facilities

2.10 There is no specific provision of medical services within Wilby and local residents predominantly tend to use facilities at Stradbroke. The Parish Council will support Ipswich and East Suffolk CCG in ensuring suitable and sustainable provision of Primary Healthcare services for the residents of Wilby."

Population

2.11 According to 2011 Census[3] data, the population of Wilby was 239 and there were 110 dwellings within the parish. Of these 98 were occupied and 12 were unoccupied – this equates to a vacancy rate of 10.9% which was well in excess of the 3.8% average for the whole of Mid Suffolk.

2.12 The gender balance of the population is relatively equal with 51.5% being female and 48.5% being male. The number of residents aged over 65 is 55 (22.2%) which is slightly above the Mid Suffolk average of 20.1% but higher than the England average of 16.3%. In 2011 there were 38 (15.9%) children under the age of 16, which is lower than both the Mid Suffolk average of 18.4% and the England average of 18.9%. There were 148 (61.9%) working age adults (aged 16-64) which was slightly higher than the Mid Suffolk average of 61.4% but below the England average of 64.7%. The dependency ratio for Wilby i.e. the Ratio of Non-working Age to Working Age Population was 0.61 which is below the Mid Suffolk average of 0.63 but above the England average of 0.55.

2.13 In terms of the health of the Wilby residents, just over 40% are classified as very good, 43% as good, 11% as fair, 3% as bad and 3% as very bad. The good and fair ratings very much mirror the Mid Suffolk and England averages, however the 'very bad' figure is over double the Mid Suffolk and England figures.

Natural Environment

2.14 Wilby is found within a large area of central north Suffolk identified as Plateau Claylands. This landscape occurs on the great plateau of glacial till or boulder clay deposited by the retreating ice-sheet of the Anglian Glaciation. This plateau is generally flat or only gently undulating and the edges of the plateau are dissected by the valleys of the Dove, Deben, Alde and Blyth. Small tributary streams provide the only relatively significant relief in this landscape such as between Wilby and Worlingworth.[4]

[3] Source ONS data https://www.ons.gov.uk/

[4] Courtesy of Julian Roughton, CEO Suffolk Wildlife Trust and Wilby Resident

2.15 This is an ancient, long-settled landscape and above all farming country. It is an area of villages and moated farmsteads. Since the 1940s changes in agriculture have impacted on the landscape, through larger field sizes, and once common farmland species such as grey partridge, lapwing, skylark, turtle dove and yellowhammer have greatly declined. Agri-environment schemes offer opportunities to address such declines although at present there are no areas in Wilby under either Countryside Stewardship or Environmental Stewardship.

Wildlife

2.16 Although Wilby has no designated sites of wildlife importance such as Sites of Scientific Interest, County Wildlife Sites or Roadside Nature Reserves it does have a number of Priority Species and Habitats.

2.17 Priority Species are those that have been identified as of greatest conservation concern across the UK usually because of a significant decline in their range or population. There are a number of priority species that live in Wilby and these include mammals such as bats (natterers and pipistrelle – recorded at Wilby Churchyard), harvest mouse, otter and water vole; amphibians and reptiles including common toad, grass snake and great crested newt and birds such breeding pairs of barn owls, bullfinches and dunnock.

Historic Environment

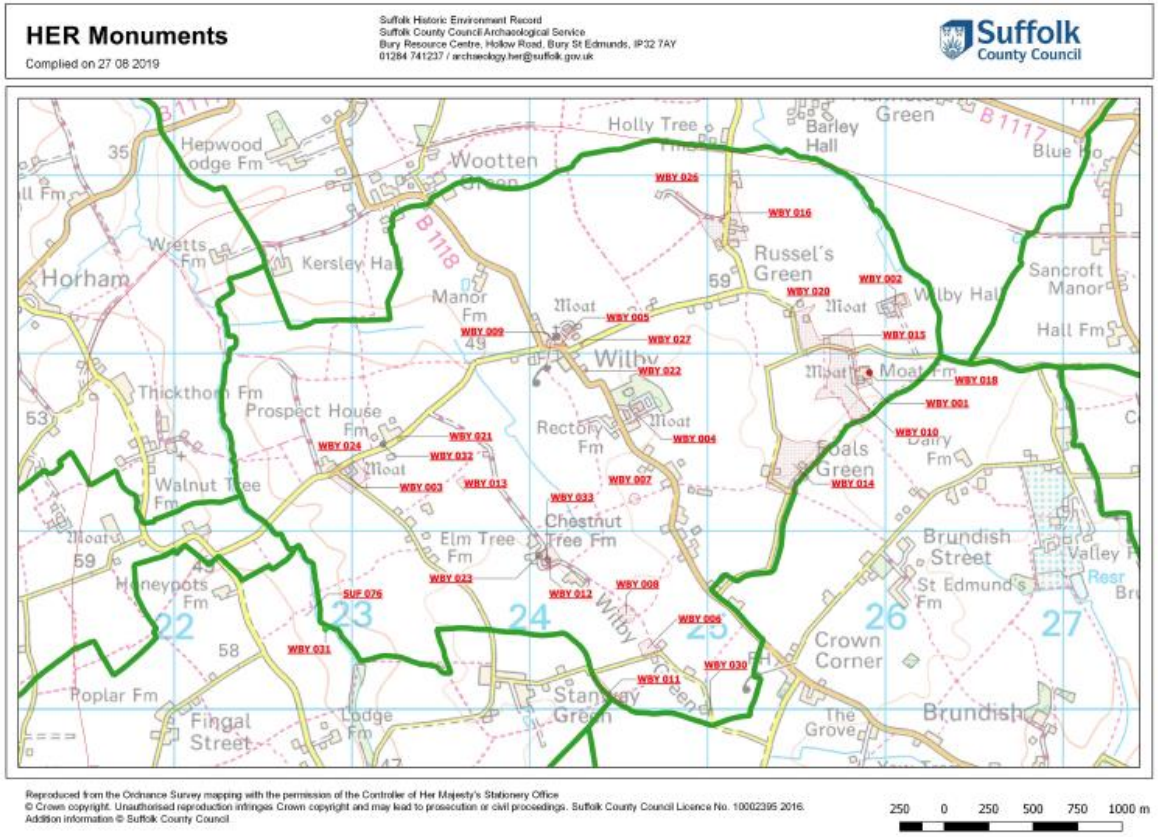
2.18 There are 30 buildings and structures within the parish of Wilby that are included on Historic England's National List. These range from the Church of St Mary which is listed Grade I, Wilby Hall and Wilby Manor both Grade II and a number of Grade II Listed farmhouses such as Rectory Farmhouse, Church Farmhouse and Foals Green Farmhouse. Wilby Hall is of interest due to its 16th century intact medieval moat.

2.19 Possibly due to its sporadic built form Wilby does not have a formally designated Conservation Area. There is a small cluster of listed cottages close to the church at the centre of the village in The Street and these include the former Swan Public House.

The Old Swan, formerly The Swan Inn

2.20 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. These are shown on Map A below.

Map A – Historic Environment Record



Transport and Access

2.21 Wilby is not well served by public transport with no direct services to or from the village. It is approximately a 30 minute walk to Stradbroke where bus services to Eye, Diss and Ipswich could previously be accessed up to September 2019 but these have now been withdrawn. There is a Community Bus provided in the village which operates on a dial-a-ride system.

2.22 There are public footpaths within the village but the network isn't necessarily coherent. The routes that exist today probably once extended between the main part of the village - the church and the various outlying farms e.g. Trust Farm, Foals Green, Town Farm, Moat Farm, Newtons Farm, Green Farm, Prospect Farm, Rokeby Farm and Rookery Farm. The principal route is Wilby FP16 which is accessed off Church Road opposite the graveyard and extends past the rear of the school before splitting into three other routes – Nos 17, 15 and 14 which all end at the by-road known as Capon Lane. FP14 passes Rokeby Farm where it becomes FP10 and continues to Wilby Green. FP11 begins at Wilby Green and joins the B1118 south of Town Farm. FP15 goes in the opposite direction before continuing straight on to become FP8 where it continues to Foals Green Road.

2.23 The footpath network as it exists is lacking with regard to the availability of circular routes of varying lengths. A more comprehensive network of routes would benefit residents in a number of ways not least the health and well-being benefits of walking, access to nature and opportunities to enjoy the countryside. This would require the opening up of more routes and would, therefore, necessitate co-operation from local farmers and landowners, with a view to looking at the potential for headlands as acceptable footpaths or permissive paths.

Floodrisk

2.24 Wilby is situated on Plateau Claylands, with seasonally waterlogged clay soils, many ponds, and some small steams and tributaries. These conditions could result in some risk from surface flooding. There are areas of Environment Agency flood zone 3 along the western parish boundary where there is an unnamed watercourse, and also some areas of the existing developed area within the parish which are predicted to be affected by surface water flooding. Surface water flood reports in Wilby all relate to flooding of the public highway.

Strategic Policy context

2.25 The National Planning Policy Framework (NPPF)[5] sets out the Government's planning policies for England and how they are expected to be applied. Every local planning authority in England is required to prepare a Local Plan. This Local Plan includes all of the local planning policies for that area and identifies how land is used, determining what will be built where. The Local Plan that covers Wilby is produced by Mid Suffolk District Council. The District Council's Local Plan, along with any Neighbourhood Plan, provides the basis for determining planning applications and future development in the local area and should be consistent with the National Planning Policy Framework.

2.26 The Wilby Neighbourhood Plan is believed to be in conformity with the revised NPPF, in particular taking a positive approach that reflects the presumption in favour of sustainable development.

2.27 Development is defined as "the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land". [6] Section 38 of the Planning and Compulsory Purchase Act 2004 emphasises that the planning system continues to be a "plan-led" system and restates the requirement that "determination must be made in accordance with the Plan unless material considerations indicate otherwise"

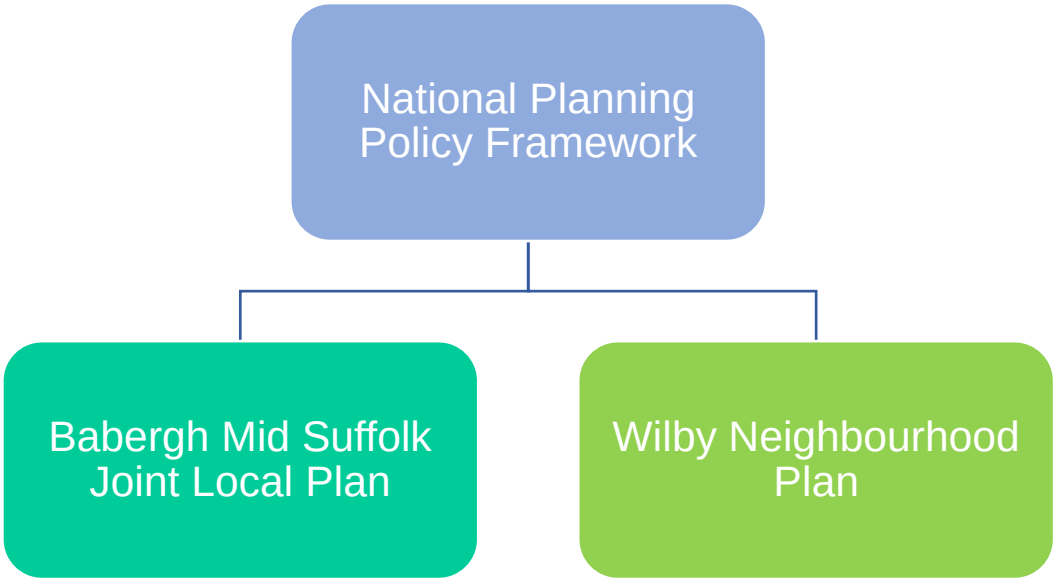
2.28 The Wilby Neighbourhood Plan once made (adopted) will form part of the statutory Development Plan for the area and future planning applications for new development will be determined using its policies.

2.29 Currently, the statutory development plan for the area consists of the saved policies in the Mid Suffolk Local Plan Adopted in 1998, the Mid Suffolk Core Strategy, Adopted in September 2008 and the Mid Suffolk Core Strategy Focussed Review, Adopted in 2012. These documents are in the process of

[5] NPPF Revised in February 2019 - https://www.gov.uk/government/publications/national-planning-policy-framework--2

[6] Town and Country Planning Act 1990 Section 55.

being replaced by the Babergh Mid Suffolk Joint Local Plan[7] (produced in conjunction with Babergh District Council) which has reached Preferred Options Consultation in July 2019. The Plan period of the existing plans runs to 2026 whereas the emerging Joint Local Plan looks to 2036. The Plan period of the Wilby Neighbourhood Plan is consistent with that of the emerging Joint Local Plan. Due regard has been given to the emerging Joint Local Plan which is expected to be adopted in 2020.



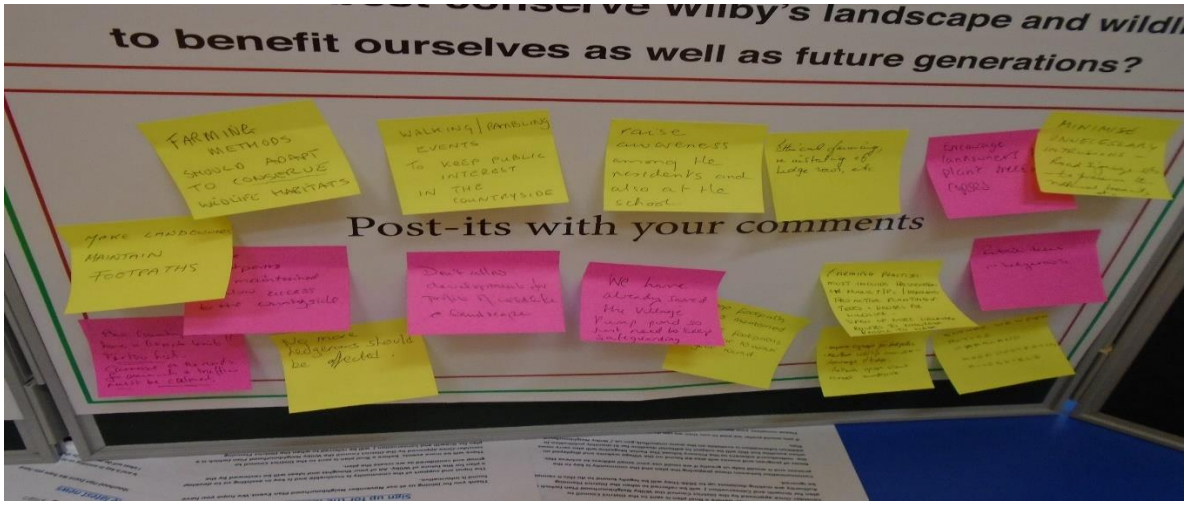
2.30 The Adopted Mid Suffolk Core Strategy identifies Wilby as a 'hamlet' in the settlement hierarchy with the expectation that new development will be to meet local needs only.

2.31 The Preferred Options Regulation 18 Consultation Version of the Babergh and Mid Suffolk Joint Local Plan (JLP) was published in July 2019, with consultation taking place until 30th September 2019. The emerging JLP identified Wilby as a 'Hinterland Village'. It indicated that in Mid Suffolk, hinterland villages are expected to account for 10% of planned growth over the plan period (April 2018 to 2036) which equates to 1174 dwellings over approximately 43 settlements. However, there is an error in the scoring matrix which defines the hinterland villages and Wilby is attributed retail development that does not exist. Mid Suffolk have subsequently confirmed that an error in

[7] https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-preferred-options-july-2019/

the scoring has been made. It is expected that Wilby will revert to its former classification as a hamlet in the next iteration of the Local Plan. The Local Plan indicates a figure of 12 dwellings for Wilby to be accommodated over the Plan period, which is largely derived from existing commitments (i.e. dwellings with the benefit of planning permission but not yet implemented) .

Entrance to Church of St Mary



3: How the Plan was prepared

3.1 The Neighbourhood Plan Volunteer Group has prepared the Plan with support from an independent consultant. The formal process began in October 2017 when a public meeting was held to gauge support for the production of a Neighbourhood Plan; strong support for proceeding was expressed. In early November after notes from the first meeting had been distributed to every household, a further public meeting agreed to go ahead with Neighbourhood Plan production. An extraordinary meeting of the Parish Council was held on 8th November and councillors unanimously agreed to proceed. An application for the designation of a Neighbourhood Area was submitted to Mid Suffolk District Council on 22nd November and the formal designation for the Neighbourhood Area was approved on 18th December 2017. The Area Designation covers the entire Parish of Wilby.

Funding

3.2 The Plan has been commissioned by Wilby Parish Council. Funding has come from a Locality grant from central government, the local County Councillor and support in kind from Mid Suffolk District Council.

Community engagement and consultation

3.3 The Wilby Neighbourhood Plan has been developed with extensive community engagement, consultation and communication. There have been three stages in which the Neighbourhood Plan Volunteer Group has actively engaged the community through consultation. More details of all the consultation will be outlined in the Consultation Statement, accompanying the submission of the Neighbourhood Plan to Mid Suffolk District Council later in 2020. Full results of all consultation events and notes are on the Neighbourhood Plan website. Below is a summary of each of the stages.

Consultation 1: Initial community consultation – October and November 2017

- Public meetings held on 9th October and 1st November 2017, where the pros and cons and implications of producing a Neighbourhood Plan for Wilby were discussed.
- Overwhelming public support for proceeding with a Neighbourhood Plan and Volunteer Group established.

Consultation 2: Evidence Gathering and public consultation on draft vision and objectives and key themes – January 2018 to November 2018

- Identification of draft vision and objectives.
- Co-ordination of evidence and local data
- Stakeholder meetings with School, Church and Village Hall,
- Public Drop-in exhibition style events held at Wilby Primary School on Saturday 24th November 10am-4pm and 5-8pm on Monday 26th November to check emerging vision and objectives and ask for views on key themes, whilst continuing to inform the community
- 95 people (47% of the adult population of the parish), attended the exhibition over the two days. Views were recorded via dots on exhibition boards and comments left on post it notes
-

Consultation 3: Public Drop-in exhibitions sessions on emerging policy ideas – March 2019

- Two drop-in events to check emerging policy ideas, assess options and develop detail in order to draft the Neighbourhood Plan, whilst continuing to inform the community. 10-4pm on Saturday 23rd March and 5-8pm on Monday 25th March at Wilby Primary School
- 38 people attended the exhibition over the two days. Views were collected via a Visitor Feedback Form which contained a number of specific questions relating to the exhibition boards.

Consultation 4: Pre-submission consultation on the draft Neighbourhood Plan – January to March 2020

- The purpose of this consultation was to present the draft pre-submission Neighbourhood Plan to obtain comments from both residents and statutory consultees. The consultation was held for 6 weeks between 22nd January and 12th March 2020. The draft plan was available in hard copy to all residents and on-line (with an online consultation response form).
- Responses were received from 22 local residents, 2 landowners and 8 statutory consultees resulting in 205 individual comments.

.

Communication

3.4 Communicating with residents through the development of the Wilby Neighbourhood Plan has been particularly important at consultation stages, but also throughout the process.

3.5 There is a dedicated Neighbourhood Plan web page which contains details of the progress of the Neighbourhood Plan, notes from Volunteer Group meetings, together with copies of the consultation materials and exhibition boards used for Consultations 2 and 3 above as well as the analysis of the results of those exercises. There are also contact details on the website for anyone wishing to receive direct updates on the progress of the Neighbourhood Plan.: http://wilby.suffolk.cloud/neighbourhood-plan/

3.6 Details of the consultation events were also published in the Parish newsletter. Posters and flyers were used to publicise events and banners were erected at the village entrances. Feedback from Consultation Event 2 indicated that the flyers were the most effective form of communicating the consultation events. An update for the Parish Council on Neighbourhood Plan progress was presented at most monthly meetings.

Key Issues Arising from Consultation

3.7 Analysis undertaken by the Volunteer Group of the results of the two public consultation sessions revealed a number of issues for the parish with some consistent themes emerging.

- Protection/retention of hedgerows should be a priority
- Footpaths need better maintenance
- Rural character of the village is important
- Concern that new development will spoil countryside views
- High traffic speeds through the village
- Parking/traffic in and around the school at peak times is a problem
- Concern over the design and visual appearance of recent new developments
- Some concerns over affordable housing development
- Accommodation for young families is beyond financial means.

- Expansion of the village must not detract from the village atmosphere and community.
- No appetite for large scale village expansion
- Lack of footways in the village
- No on street parking
- Concerns over sewerage capacity of Wilby – no mains drainage.
- Any increase in the size of the village should meet local need and be small scale.
- Development should respect wildlife habitats, existing built, natural and existing environments.
- Broadband is slow and mobile phone reception is patchy
- More moderate size properties to meet local need are required.
- Village amenities such as the church, school and village hall are valued.
- Support for domestic scale renewable energy measures such as solar panels and ground source heat pumps
- No support for wind turbines
- Support for a green area/play space

3.8 The themes that have emerged through the consultation exercises have helped to shape the Neighbourhood Plan's Vision and Objectives and, ultimately its policies.

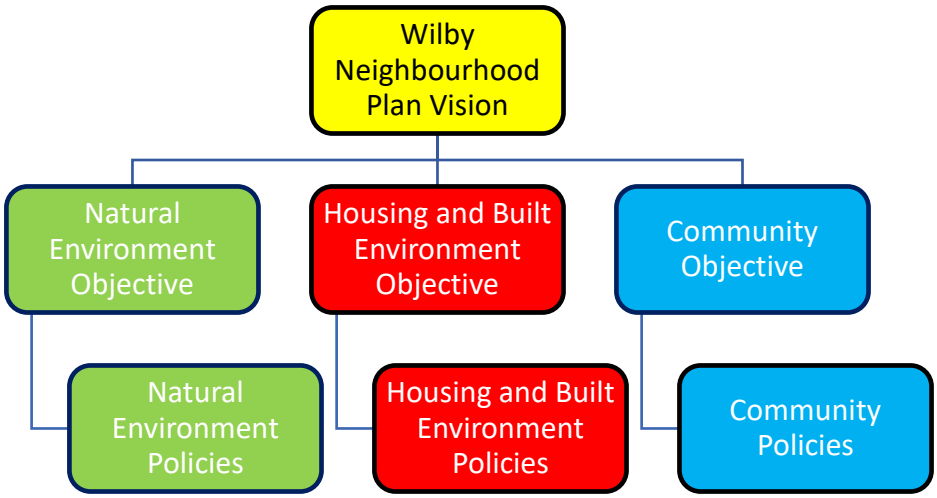
4: Vision and Objectives

Our Vision for Wilby
"Our vision for future Wilby sees the rural beauty of its natural environment preserved, with change to its amenities and built environment managed pro-actively, creatively and sustainably to the benefit of all those living here, working here, visiting or passing through"

4.1 It is important that any Neighbourhood Plan contains a short and simple vision statement which sums up the community's aim for the future of the parish. The Neighbourhood Plan vision is an overarching statement describing what Wilby should be like at the end of the Plan period i.e. 2036. It has been developed with local people and has been refined and adapted through the two public consultation sessions held in November 2018 and March 2019. The result is a vision statement which captures the overarching spirit and ambition of the local community and the Neighbourhood Plan.

4.2 The vision underpins the objective and policies of the Wilby Neighbourhood Plan and is referred to throughout.

4.3 From the vision flow the different objectives of the Neighbourhood Plan and from there, the policies. The diagram below outlines this relationship.



Structure of the Wilby Neighbourhood Plan

4.4. The objectives of the Neighbourhood Plan are broad statements of intent and they are there to help deliver the vision and link to the issues that Wilby is seeking to address. They have been drafted using themes picked up at an early stage and have been refined through the community consultation exercises.

Natural Environment	**Objective 1: To ensure that the rural nature of the parish is maintained, supported and encouraged, whilst safeguarding and enhancing the natural environment and wildlife in the area and minimising all forms of pollution**

Housing and Built Environment	**Objective 2: To preserve the best elements of the heritage and built environment and allow for sensitive, proportionate and sustainable development within the Plan area**

Community	**Objective 3: To encourage cohesion of the whole parish and promote community wellbeing by providing sufficient and suitable facilities, including support for the vibrant functioning of the school, the church and the community hall.**

5: Neighbourhood Plan Policies and Community Projects

5.1 The vision and objectives have provided the framework to develop the policies in the Neighbourhood Plan. Each policy relates to a particular objective under the following three broad themes: The Natural Environment, Housing and the Built Natural Environment, and Community.

5.2 The Neighbourhood Plan is first and foremost a land-use document for planning purposes. All policies in the Plan have been derived from a series of consultation events, stakeholder engagement and desk research, which provide the justification and evidence base for their selection.

5.3 The Neighbourhood Plan policies follow the government's guidance. They exist to:

- Set out locally led requirements in advance for new development in the parish.
- Inform and guide decisions on planning applications.
- Ensure that the multitude of individual decisions add up to something coherent for the area as a whole[8].

[8] Tony Burton, Writing Planning Policies, Locality.

5.4 To aid interpretation for decision makers and planning applicants, each policy is accompanied by supporting text, which includes context for the theme, the views of residents, guidelines and reference to strategic plans. This is set out before each of the policies.

Community projects and community aspirations

5.5 As expected, during consultation events the local community identified a number of projects that fall outside the remit of planning policy. These have been identified as non-planning policy actions called 'community action projects and are listed within the relevant Chapter. The Community Action Projects will be taken forward outside the Neighbourhood Plan process and they will be used by the Parish Council to direct spending of the Community Infrastructure Levy income that will be received as a consequence of new development Projects identified to date are shown below. These are included below and are not an exhaustive list. See **Chapter 9** for more details on implementation of the Plan.

Community Action Projects for future consideration

- To explore possibilities and use opportunities to create new paths and routes which connect or link with existing Rights of Way and provide a comprehensive, safe and useable network, with priority given to creating a safe route from the housing allocation on Stradbroke Road to the school.
- Positive promotion of recreational access to the countryside via the existing Rights of Way network within Wilby.
- Enhancement of Wilby's natural environment through Parish Tree and Hedge Planting Scheme
- Explore the potential for a Community Owned and managed Solar Energy facility

6 The Natural Environment

Objective 1. To ensure that the rural nature of the parish is maintained, supported and encouraged, whilst safeguarding the natural environment and wildlife in the area and minimising all forms of pollution.

Landscape and natural features

6.1 Wilby sits close to the centre of a large area defined by Natural England as the **'South Norfolk and North Suffolk Claylands'** National Character Area. Suffolk County Council (SCC) has carried out an in-depth assessment of the particular character and qualities of Suffolk's landscape areas. Wilby is found within a large area of central north Suffolk identified as **Plateau Claylands**.

6.2 This landscape occurs on the great plateau of glacial till or boulder clay deposited by the retreating ice-sheet of the Anglian Glaciation. This plateau is generally flat or only gently undulating and the edges of the plateau are dissected by the valleys of the Dove, Deben, Alde and Blyth. Small tributary streams provide the only relatively significant relief in this landscape such as between Wilby and Worlingworth.

6.3 This is an ancient, long-settled landscape and above all farming country. It is an area of villages and moated farmsteads. Since the 1940s changes in agriculture have impacted on the landscape, through larger field sizes, and once common farmland species such as grey partridge, lapwing, skylark,

turtle dove and yellowhammer have greatly declined. Agri-environment schemes offer opportunities to address such declines although at present there are no areas in Wilby under either Countryside Stewardship or Environmental Stewardship.

6.4 Although Wilby has no designated sites of wildlife importance such as Sites of Scientific Interest, County Wildlife Sites or Roadside Nature Reserves it does have a number of Priority Species and Habitats. Suffolk Biodiversity Partnership has identified 25 Priority habitats across Suffolk, of which 8 are found in Wilby: **(See Map B**)

- **Hedgerows:** The 1st Edition Ordnance Survey shows a field pattern formed of small fields with co-axial field boundary pattern. This is an ancient field pattern largely established in medieval times as opposed to more recent 18th and 19th century field enclosures elsewhere in the country. There has been a huge loss of ancient hedges and associated field boundary trees mainly as fields were enlarged and merged in the late 20th century.

- **Traditional orchards:** Historically Wilby was rich in old orchards with up to 27 old orchards mostly associated with farmhouses and small in size. Of these only 2 traditional orchards are thought to be remaining - at Wilby House and Rookery Farm.

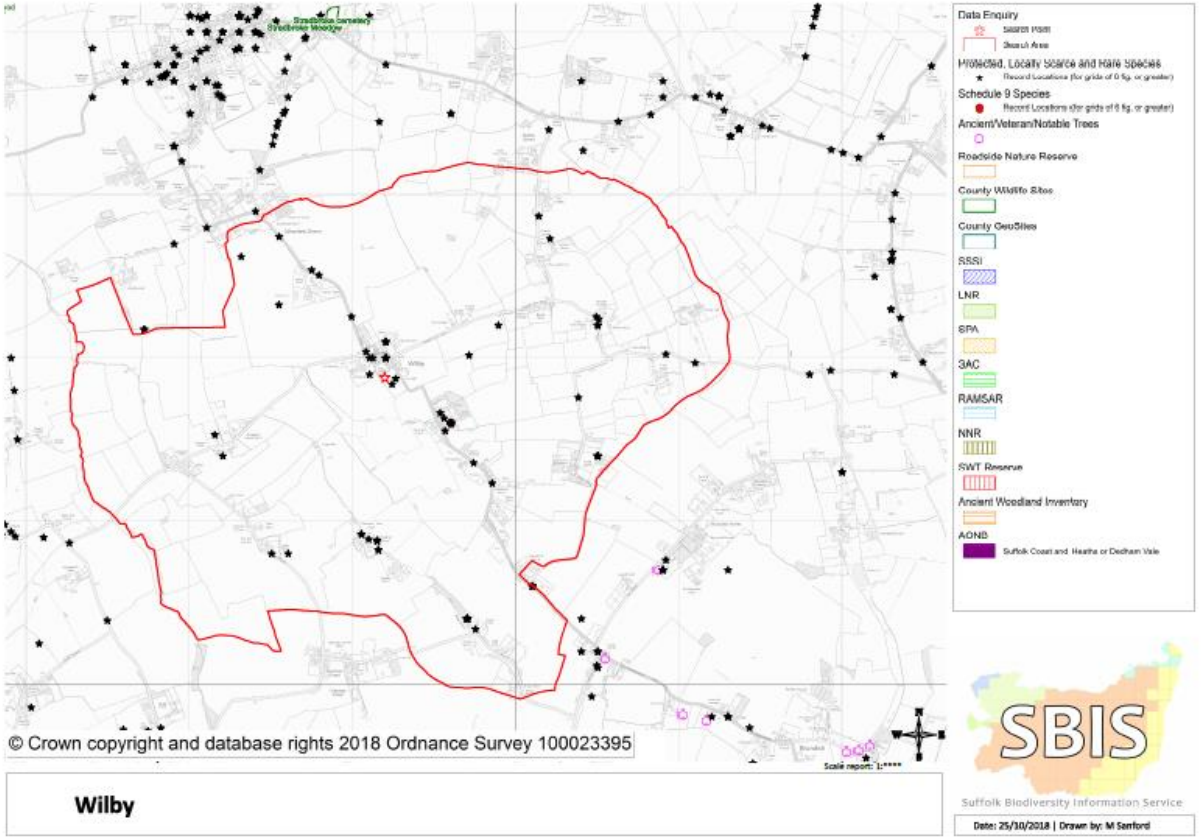
- **Wood pasture and parkland:** The land leading up to Wilby Hall has the characteristics of parkland with a number of veteran oak trees.

- **Mixed deciduous woodland**: although there is no designated ancient woodland there are a number of deciduous woodlands throughout the parish. The main woodland areas are around Wilby House (which dates from the late 19th century) and more recently planted broadleaved woodland along London City Road and at Foals Green.

- **Arable field margins:** field margins are areas between the crop and field boundaries. Where created these can provide valuable rough grassland or can be planted with wildflowers for pollinators and farmland birds.

- **Lowland meadows**: Historically these were managed for hay and livestock grazing. Meadows are still associated with larger farmhouses such as at Moat Farm and Wilby Hall. Wilby Green is a historic common and is the only significant area of species-rich grassland within the parish.

Map B Priority Species in Wilby



- Parts of Wilby Green have developed into trees and scrub as a result of lack of management.

- **Rivers and streams**: a small stream, a tributary of the River Dove, occurs on the boundary with Horham parish and there is a small stream between the B1118 and the lane that serves Rokeby Old Hall and Chestnut Lodge.

- **Ponds:** This area of Suffolk has amongst the greatest density of ponds in the UK. Wilby with its heavy, seasonally waterlogged, clay soils has at least 50 ponds across the parish. However, many ponds are in poor condition due to lack of management, over-shading or poor water quality. Wilby is also rich in moats which largely date back to the medieval period and mainly from 1200 to 1325. Examples of these are at Wilby House, Wilby Hall, Moat Farm, Church Farm and Rookery Farm. Suffolk (along with Essex) has the largest number of medieval moats in England. Moats like ponds are important for wildlife.

Trees and Hedgerows

6.5 Wilby has very little woodland so trees and hedgerows are of particular value in the parish. Wilby's remaining hedgerows are largely remnants of a medieval field pattern and of great importance to the historic landscape and offer valuable wildlife corridors across an arable landscape.

6.6 Hedgerow and roadside trees, mainly oaks, are of great importance in the parish e.g. oaks along London City Road. Non-woodland trees are much diminished from a hundred years ago and those that do remain are vulnerable due to their age and disease. A recent disease, ash die-back, is likely to result in the loss of the majority of ash trees and older oaks are vulnerable to acute oak decline.

6.7 Non-woodland trees play a vitally important role, both individually and collectively, in the parish:

- They make a highly visible contribution to the landscape of the parish
- They provide important ecological habitats and support a wide range of wildlife;
- They help to reinforce the distinctive, rural character of the village;

6.8 It is inevitable that many of these non-woodland trees will be lost over the next fifty years so the replacement of these trees along roadside verges and hedgerows is vital.

6.9 The results of the public consultation exercises reinforced the value that the residents of Wilby place on the surrounding rural environment. The results of the November 2018 Exhibitions indicated that 84 people (88% of respondents) felt that protecting the natural environment was an important issue with the main features being mentioned as footpaths, trees and hedges. The March 2019 Policy Ideas Exhibition advocated a specific policy idea for protecting the landscape setting of the village. This was well received with 36 respondents (95%) agreeing with the policy idea. It was clear from comments made at both consultation stages that local wildlife – including commonly spotted species and local habitats were also important to local people.

6.10 Nationally and locally designated sites e.g. SSSI and Local Nature Reserves are protected through national planning policy in the NPPF and also in specific legislation. However there is often little protection in Local Plans for non-designated local features which have a nature conservation value. The following policy has been broadened from the original policy idea to include the protection of natural features in addition to local landscape.

6.11 The policy also refers to 'wildlife corridors' which is a term used to refer to any linear feature in the landscape that can be used for the migration or dispersal of wildlife. Wildlife corridors enable the linking of habitats and reduce the isolation of populations. Linear features vary considerably in size (in terms of width and length), they may not be continuous, for example, a hedgerow may have a gate in it or an opening to a field. The extent to which a linear feature is broken by gaps has implications in terms of its function as a corridor. Patches of natural features or a particular habitat type can also enable wildlife to disperse/migrate - the term *'stepping-stones'* has occasionally been applied to them. The role of wildlife corridors is assuming greater importance and opportunities should be taken to create them as a consequence of new development.

WIL1	**Landscape and Natural Features** The visual scenic value of the landscape and countryside in the Neighbourhood Area outside the defined settlement boundary will be protected from development that may adversely affect this character. Those parts of the neighbourhood area that include sensitive features typical of the South Norfolk and High Suffolk Plateau Claylands Character Area will be particularly protected. The following Natural Features will be protected from development that would have a significant adverse impact upon their character, appearance and wildlife value: a) Ancient Hedgerows and associated field boundaries b) Traditional Orchards at Wilby House and Rookery Farm c) Wood Pasture and parkland at Wilby Hall d) Mixed deciduous woodland around Wilby House, along London City Road and at Foals Green e) Lowland Meadows at Wilby Hall and Moat Farm f) Wilby Green Development proposals will be expected to retain existing features of high landscape and biodiversity value (including ponds, trees, woodland, hedgerows and verges) provided this is justified. In addition, where practical to do so, (or where there is any loss to existing natural features) development will be expected to provide a net gain in biodiversity through, for example: a) the creation of new natural habitats and/or wildlife corridors. b) the planting of additional trees and hedgerows and restoring and repairing fragmented biodiversity networks. Where loss or damage is unavoidable, the benefits of the development proposals must be demonstrated clearly to outweigh any impacts and the development shall provide for equivalent or better replacement planting on site together with a method statement for the ongoing care and maintenance of that planting. Where development proposals cause damage to identified natural features, wildlife corridors around the interruption will be constructed.

Maps showing the natural features identified in the policy are shown in Appendix B

Important Views

6.12 At the November 2018 Exhibitions reference was made in the comments section to retaining of important views within the Parish. Concerns were expressed about the potential for new development to spoil existing views over farmland and the importance of the views at the edges and entrances to the village together with unnecessary intrusions of signage including road signs were also mentioned. In addition it is recognised that the low level of man-made ambient light in Wilby enables good observation of the dark night skies.

6.13 The March 2018 Exhibition asked a question in respect of a policy on retaining important views and included a specific map with a series of potentially important views within the parish marked on it. Respondents were asked to identify which views they considered to be the most important to them. 35 respondents (92%) agreed with the policy idea with no disagreement.

The results are shown below:

Policy Idea 2 – Important Views

Long Views Map

VIEW	NUMBER
A	22
B	26
C	32
D	26
E	19
F	15

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 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.

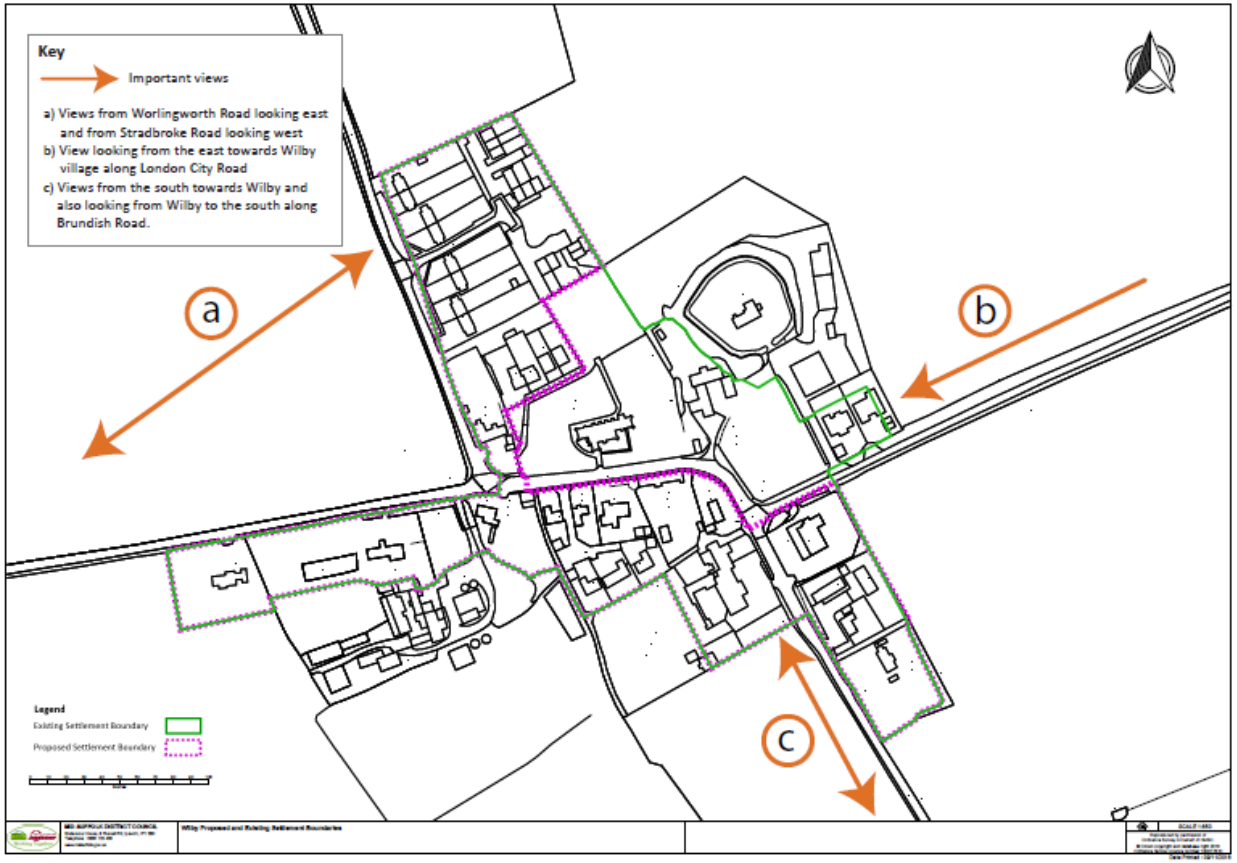
Proposals within or that would affect an important view should ensure that they respect and take account of the view concerned. Developments which would have an unacceptable adverse impact on the landscape or character of the view or vista will not be supported.

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



Local Green Spaces

6.13 The National Planning Policy Framework 2019, at paragraphs 99-101 introduces the concept of Local Green Spaces which can be identified through neighbourhood plans by local communities and allows green areas identified as being of particular importance to be protected. Paragraph 100, sets out 3 broad criteria for identifying and designating such spaces as follows:

'The Local Green Space designation should only be used when the green space is:

a) in relatively close proximity to the community it serves

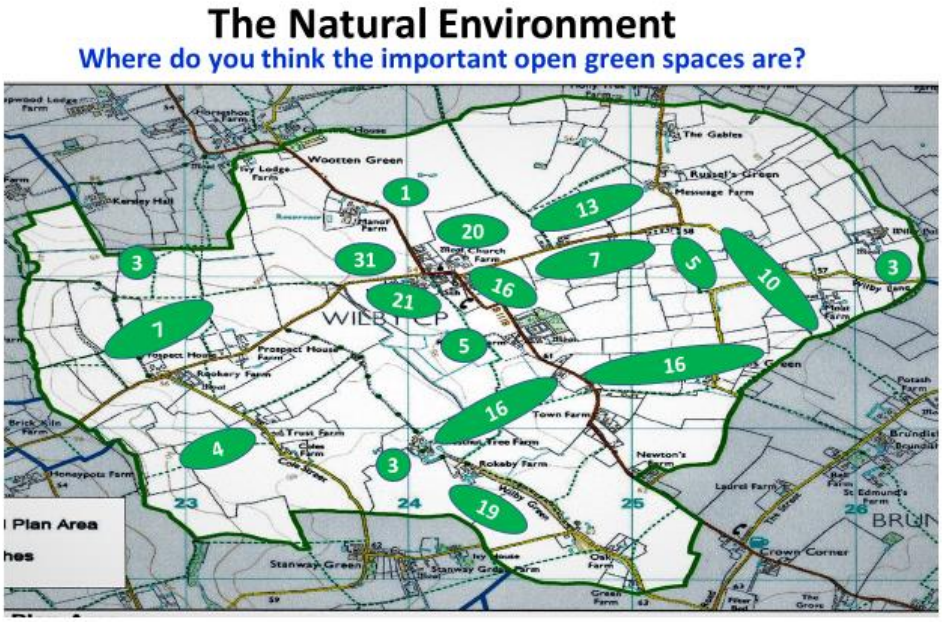
b) demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field) tranquility and richness of its wildlife: and

c) local in character and not an extensive tract of land'

6.14 The NPPF at paragraph 101 then goes on to state that 'policies for managing development within a Local Green Space should be consistent with those for green belts' and therefore affords them a very high level of protection. It is also clear that the designation of Local Green Spaces should not be used as a mechanism to try to block or resist development on agricultural land immediately adjacent to village development boundaries and that a successful designation must meet the criteria outlined above.

6.15 Such spaces can be viewed locally as equally as important as the landscape setting of an area. Such spaces are green spaces found within the built up area that contribute to the character of a settlement. These can vary in size, shape, location, ownership and use but such spaces will have some form of value to the community and help define what makes that specific settlement what it is. There is good evidence which supports the view that the presence of green spaces around developments are beneficial for mental health

6.16 The November 2018 Exhibition asked local people to indicate on a map any spaces that they felt should be considered for Local Green Space designation. The results of that exercise included 18 nominations across the entire parish but with the highest concentration of popular spaces being located on the edge of the main built up area in the centre of the parish.



6.17 The March 2019 Exhibition included a specific question relating to the potential for including a policy on Local Green Spaces in the Neighbourhood Plan and also asked residents to assess which of the previously identified spaces met the criteria outlined in the NPPF (information on the criteria was also supplied). There was support for the principle of a Local Green Spaces policy with 34 respondents (89%) agreeing and with no disagreement. The results are shown below:

Policy Idea 3 – Local Green Spaces

	Agree	Disagree
Protecting local green spaces (LGS)	34	0

Which LGS meet the criteria?

LGS	NUMBER
A	28
B	26
C	26
D	23
E	17

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

Renewable Energy and Low Carbon Technology

6.20 Government Guidance states that the planning system should support the transition to a low carbon future and help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, including encouraging the re-use of existing resources and support for renewable and low carbon energy.

6.21 Unsurprisingly given the current prominence of low carbon issues in the media, the length of the plan period of Neighbourhood Plans, and the likelihood of technological improvements during that period, many Plans include planning policies that can help to reduce greenhouse gas emissions such as through location, orientation and design. Some also include policies to help to increase the use and supply of renewable and low carbon energy and heat.

6.22 The November 2018 Exhibition included a specific section on renewable energy and asked what the Neighbourhood Plan should include. The responses were limited and tended to focus specifically on wind turbines, solar farms and solar panels. The results indicated that there was no support for wind turbines but that there was some support for small scale solar and individual measures (21 comments). The consultation also asked if there were any locations that would be considered suitable for small-scale solar or wind energy sites, but no specific sites were put forward.

6.23 The March 2019 Exhibition asked two specific questions – firstly about whether there would be any support for a policy that allowed for small scale solar energy. 24 (63%) respondents indicated they agreed with the principle of such a policy with 12 disagreeing (31.5%). The second question asked about support for a policy that would enable individual energy efficiency measures such as roof mounted solar panels, air and ground source heat pumps. 31 respondents (81%) agreed with the idea and 4 (10.5%) disagreed.

6.24 The following policy has been devised in the light of the consultation responses, taking into account the increasing prominence of climate change and low carbon issues.

WIL4:	**Renewable Energy and Future Sustainability** Proposals for well designed, small-scale renewable energy development [9]including solar arrays will be supported where such proposals do not significantly adversely affect the character or visual appearance of the landscape or would adversely affect protected natural assets. Proposals that incorporate energy saving measures into new development which help to mitigate or offset climate change and minimise visual impact will be supported. Support will be given to proposals that include (but are not limited to) one or more of the following technologies: a) passive solar gain; b) grey water recycling and rainwater capture and surface water harvesting; c) biomass/wood pellet boilers; d) air source and ground source heat pumps; e) Passive ventilation[10] f) thermal mass[11] g) on-site energy generation from renewable sources such as solar panels h) include a layout and massing that takes account of local climatic conditions, including daylight and sunlight, wind, temperature and frost pockets.

Footpaths

6.25 The consultation indicated that the community is aware of the need to protect the environment, not only the surrounding farmland, but also conservation of local habitat, including preservation of trees and hedges and remaining medieval field patterns. The relative lack of trees and hedges does impact on local footpaths, some of which can be particularly bracing and exposed. Reinstatement of hedgerows and trees along some of the routes where practical would make for a more comfortable walking experience, whilst also benefitting wildlife and habitat protection. This, in turn, could encourage more villagers to get walking.

[9] Definition of small scale as set out in the Renewable Energy (Electricity) Regulations 2001 e.g. <100kw or <250mwh of electricity generated per annum.

[10] Passive ventilation – allowing fresh air into a building whilst removing stale air

[11] Thermal Mass – the ability of material to absorb and store heat energy

7 Housing and the Built Environment

Objective 2. To preserve the best elements of the heritage and built environment and allow for sensitive, proportionate and sustainable development within the Plan area

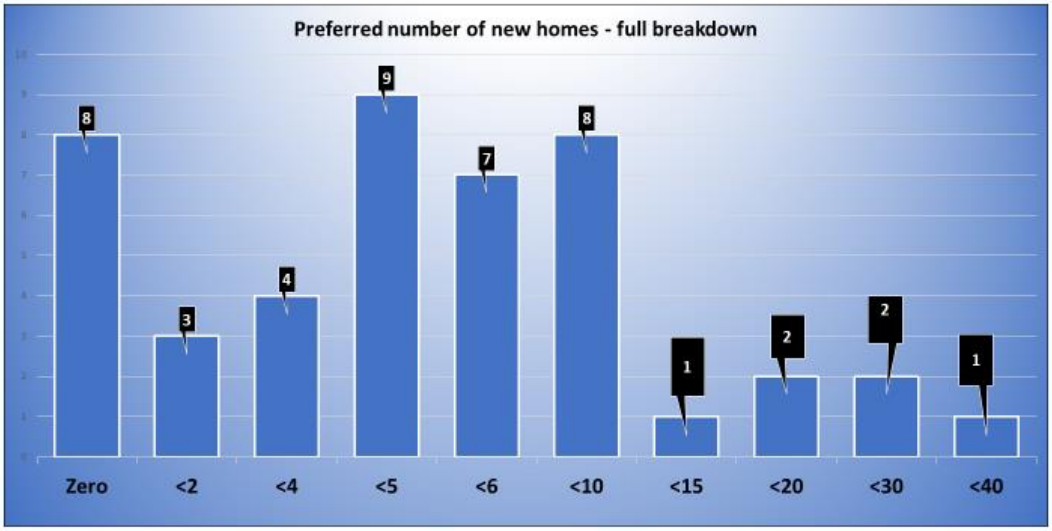
Housing

7.1 Government guidance advises that Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area. In addition they should support the delivery of strategic policies contained in local plans and should shape and direct development that is outside of these strategic policies. Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.

7.2 The issue of new housing is often a key determinant in the decision by a local community to embark upon the production of a Neighbourhood Plan. The issue of future housing development in Wilby has been a feature of each of the public consultation events undertaken to date.

7.3 Due to the emerging Joint Local Plan still being in its early stages, when work on the Neighbourhood Plan began it was not known what level of new housing growth might be expected to be accommodated in Wilby up to 2036. The November 2018 Exhibitions posed a broad question to the local community and asked "If Wilby were to be allocated more new homes in the MSDC Local Plan, what number do you think would be appropriate?". It is not unusual for respondents to initial consultations such as this to indicate a preference for no new development, however, Government Guidance indicates that Neighbourhood Plans are required to be positively prepared and should not be used as a mechanism for stopping development. The full results are shown below and indicate a slight preference for a range of 5-10 dwellings.

Built Environment 2



:

7.4 In addition respondents were asked to nominate potential new sites for development and the results are shown below:

Built Environment 3

Where within the Settlement Area do you think new homes could be built?

The numbers in the spots represent how many individuals responded to the question NOT the number of new homes

7.5 It was during the assessment of these results that it became clear to the Volunteer Group that there was a high degree of crossover between the sites put forward for housing and the sites nominated to be protected as Local Green Spaces. An additional consultation event to give the opportunity to explore this further was held in March 2019. It was hoped that by displaying the results of the November Consultations to the public (and thereby highlighting the potential conflict between suggested uses for areas of land) that the Volunteer Group would acquire some more in depth information .

7.6 The March 2019 Exhibition displayed the potential housing sites nominated from the previous round of consultation and asked respondents to rank the sites in order of preference. It also asked for feedback on the principle of a policy that allocated a site in the village for up to 10 dwellings based on the previous consultation responses. The results are shown in full below:

Policy Idea 6 – New Housing Sites

	Agree	Disagree
Housing locations for up to 10 dwellings	20	4

Built Environment - New Housing Sites

Site	Votes	No. of Houses		
		Average	Median	Mode
A	18	5	4	3
B	17	5	5	5
C	10	5	4	4
D	12	4	4	5
E	3	7	10	10
F	13	5	5	6
G	6	7	6	6
H	9	4	4	3
I	6	4	3	3
J	9	4	3	2

7.7 From these results it can be seen that 20 respondents (53%) agreed with the principle of the policy for up to 10 dwellings and that 4 respondents (11%) disagreed. In terms of locations, two sites A and B – both east of Stradbroke Road were the most popular. Neither site has been proposed as a Local Green Space or identified as an important local view. The next two most popular sites C – Land west of Stradbroke Road and North of Worlingworth Road and Site D, North of London City Road were identified through the consultations as the most important local views and also as the two most popular candidates for Local Green Spaces. Site F received 13 votes however this was also identified as a potentially important heritage asset immediately adjacent to a Listed Building.

7.8 As mentioned in earlier chapters, the Preferred Options (REG18) Version of the JLP identifies Wilby as a 'hinterland village' in the third tier of the Local Plan settlement hierarchy. Concerns were raised by the Parish Council in response to that consultation that the scoring matrix for Wilby was incorrect as it assigned 2 points for retail where none exists. MSDC clarified in April 2020 that an error had been made in the scoring matrix. The outcome would be to reduce the score for Wilby from 9 to 7. A score of 9, places Wilby in the 'hinterland village' category whilst a score of 7 would return it into the 'hamlet' category assuming that MSDC maintain the same thresholds in future versions of the Local Plan.

7.9 The emerging Local Plan indicates at Section 8 in Policy SP03 that development within hinterland and hamlet villages within settlement

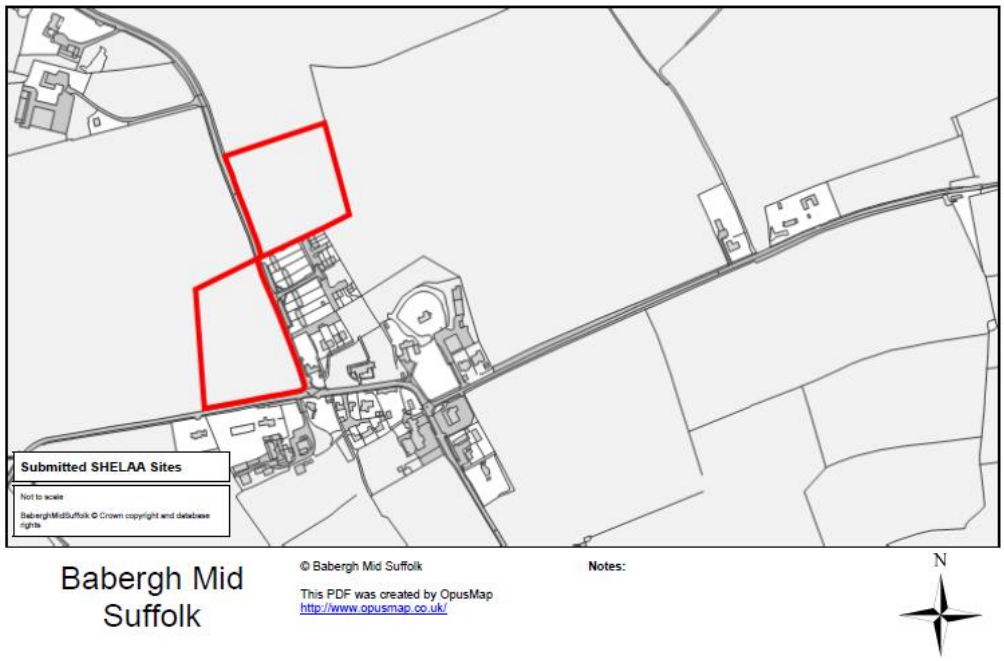
boundaries will be permitted subject to criteria governing design, landscaping, hedgerows and treelines and the cumulative impacts of proposals.

7.9 The draft Local Plan contains a minimum figure of 12 dwellings to be accommodated in Wilby over the plan period. This figure is broadly consistent with the results of the Neighbourhood Plan consultations to date.

7.10 The emerging JLP includes a proposed amendment to the Settlement Boundary which includes part of housing site C, the inference being that this site would be suitable for new housing development (5 dwellings) in the opinion of MSDC. This is at odds with the emerging conclusions of the Wilby Neighbourhood Plan and it would be fair to say that MSDC may not have been aware of the results of the consultation exercises undertaken to date or the details of local views when the decision to include this site within the settlement boundary was made. Objections to this site have been made by the Parish Council through the consultation on the Joint Local Plan and a request to replace this site with an equivalent site on the opposite side of the road – east of Stradbroke Road – which is the community's preferred option has been made. The sites are in the same ownership and the Agent on behalf of the landowner has indicated a willingness to work with the local community to bring the Community's preferred site forward instead of the site identified by Mid Suffolk.

7.11 Both Site C and the community's preferred option of Site A were put forward by landowners to Mid Suffolk for potential inclusion in the Local Plan as part of the Call for Sites in March 2018. See Map below.

Call for Sites (SHELAA Sites) – MSDC



7.12 The current commitment for Wilby at the base date of the Plan (1st April 2018) is 11 dwellings. Details of these permissions are shown in **Appendix D.** According to Mid Suffolk's own monitoring figures[12] the annual average completion rate in the village between 2010 and 2015 was 2 dwellings per annum.

7.13 The minimum housing requirement outlined in the Local Plan is 12 dwellings, of which, 11 dwellings are already committed. The Plan period still has over 16 years left, however Wilby is a village with very limited services and public transport which needs to be taken into account. Therefore it would seem appropriate and realistic for the Neighbourhood Plan to include an allocation for 5 dwellings to meet the dwelling requirement. The policy also makes a small allowance for windfall development. These are dwellings that will come forward during the plan period but are generally unforeseen and small in number. They typically consist of the conversion of existing buildings, often farm buildings or single plots inside the settlement boundary. However, the settlement boundary for Wilby is drawn tightly around existing development and there is very little scope for new dwellings within the boundary. Therefore any windfall development within the Plan period is more likely to come from the conversion of existing buildings outside of the settlement boundary. The

[12] Wilby Parish Profile September 2015

Neighbourhood Plan will therefore be planning for at least 16 dwellings for Wilby over the Plan period from April 2018 to March 2036.

WIL5	**Future Housing Provision** The Neighbourhood Plan will accommodate development in Wilby commensurate with its classification in the settlement hierarchy. This plan provides for around 16[13] dwellings to be developed in the Neighbourhood Plan area between April 2018 and March 2036 of which 11 dwellings are already committed. The housing target will be met through a combination of the existing commitment together with: 1) Allocation of a site for around 5 dwellings (H1), east of Stradbroke Road (B1118) **See Map E.** 2) small 'windfall' sites and infill plots within the Settlement Boundary that come forward during the Plan period and are not specifically identified in the Plan; 3) conversions and new development opportunities outside the Settlement Boundary in accordance with paragraph 79 of the NPPF 2019.

7.14 Therefore in line with the results of the community consultation it is proposed to allocate a site for 5 dwellings to meet the dwelling requirement identified in the emerging Local Plan east of Stradbroke Road for housing development to meet the identified housing target up to 2036. The reasons for allocating this site in preference to the site identified in the emerging Babergh Mid Suffolk Local Plan are:

1) The site is 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

[13] From Preferred Options of Babergh-Mid Suffolk Joint Local Plan Published July 2019

just the proposed site and improve its connectivity to the rest of the village.

3) The site is 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.

7.15 National planning policy states that major development should use SUDS unless it is inappropriate. Whilst the allocated development in Wilby is less than 10 dwellings, and therefore not classified as a major development, it is not strictly required to incorporate SUDS, however Suffolk County Council as the Lead Local Flood Authority do strongly recommend it.

7.16 With light traffic numbers generated from the site, the number of dwellings is considered by the Highway Authority as unlikely to have an impact on the highway network. This site is within walking distance to the Primary School, and therefore the Highway Authority have advised that the development will need to provide a footway from the site to the existing footway on Church Road to create a safe route for the vulnerable user. It is important that on-site parking and turning should be provided in accordance with Suffolk Guidance for Parking 2019 (SGP)3.

7.17 Given the heritage sensitivities associated with the site, which are explored in more detail below, and its edge of village location, it has also been considered necessary to ensure that development associated with the creation of the access to the site respects the rural character of the area. Any junction infrastructure and footway design should correspond to the character of the site, rather than employ a standard design. The principles of design found in the government's guidance document Manual for Streets 2 [14] (particularly section 2.7) should be the guiding ones used and also Historic England's own Streets for All [15]document should be taken into account, which provides some

[14] Manual for Streets 2 https://tsrgd.co.uk/pdf/mfs/mfs2.pdf

[15] Historic England Guidance https://historicengland.org.uk/images-books/publications/streets-for-all/

advice on new works to carriageways in historic places. Access designs in village edge locations such as the entrances to Wilby, should avoid the use of a very urban form of tarmacked pavement and concrete kerbs along the edge of the road towards the village, in place of the softer and more rural appearance of the verge as it is currently to ensure that it is not to the detriment of the proposed new development of this village edge site The policy wording has been amended to reflect this requirement.

7.18 Consultation at Pre-Submission Stage elicited some concerns from Historic England about views across the site towards the Church, which is a Grade I listed heritage asset and the impact that the loss of these views would have on the significance of the setting of the Church The Volunteer Group undertook a Site Heritage Impact Assessment in June 2020, in order to assess any potential impacts and to consider any mitigation measures that might be required.

7.19 The Site Heritage Impact Assessment concluded that 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. It went on to conclude that the development of the site does have the potential to affect the setting of the church tower when viewed form 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.

7.20 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. The View Safeguarding Zone is identified on Map F and accompanies the policy. The policy wording has been amended 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..

7.21 The Site Heritage Impact Assessment 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 dwelling layout in terms of potential heritage impacts.

7.22 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.

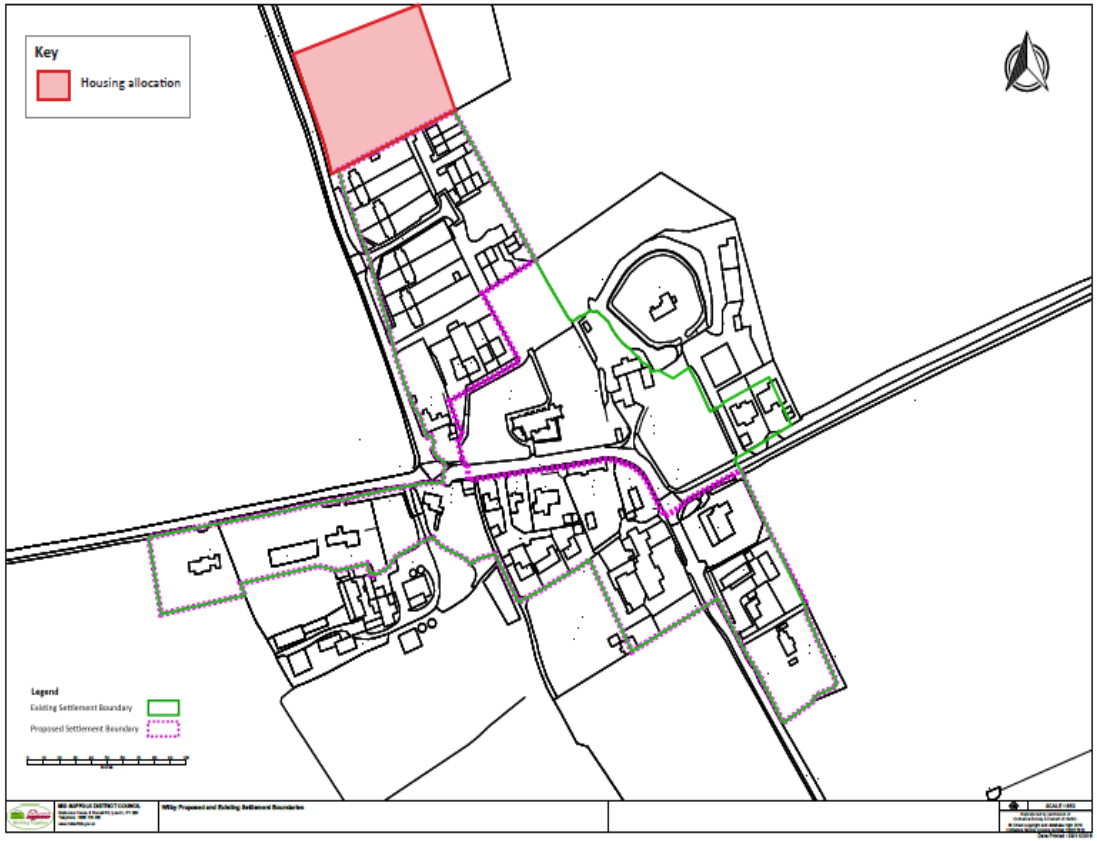
The full site Heritage Impact Assessment is shown at **Appendix E**
A full assessment of the site covering other issues is included as **Appendix F.**

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 Maps E and F**

Housing Site East of Stradbroke Road

Map E - Housing allocation Site H1



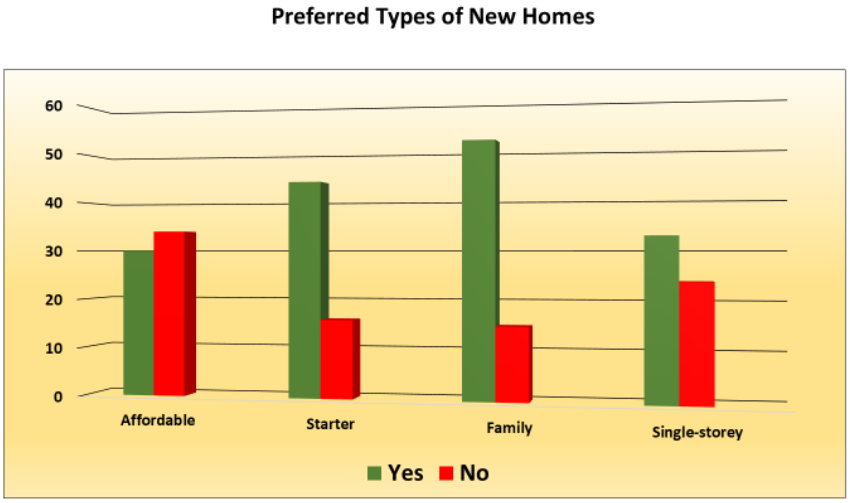
Map F – View Safeguarding Zone

Housing Mix

7.23 In addition to overall housing numbers, the size, type and tenure of any new housing is also a key housing issue for local communities. The specific mix of housing will clearly have an impact on the existing community and therefore careful thought needs to be applied to determining that mix.

7.24 Government guidance indicates that delivering a wide choice of high quality homes is essential to support a sustainable, vibrant and mixed community. Community consultation has indicated that residents are interested in a range of types of accommodation within the parish to meet their changing needs and to cater for any needs that are currently not being met for example families wishing to move into the parish. New homes should be of high quality, accord with environmental design standards and meet community aspirations for new and existing residents. The mix of housing types outlined in Policy WIL6 below has come though consultation with local residents both through the November 2018 and March 2019 Exhibitions.

7.25 In November residents were asked an open question: "What type of home are needed in Wilby?". The results are shown below:



7.26 Support was the greatest for family housing with 52 respondents (58%) advocating this form of housing and 15 respondents (16%) disagreeing. The second most popular form was starter housing with 44 (46%) supportive and

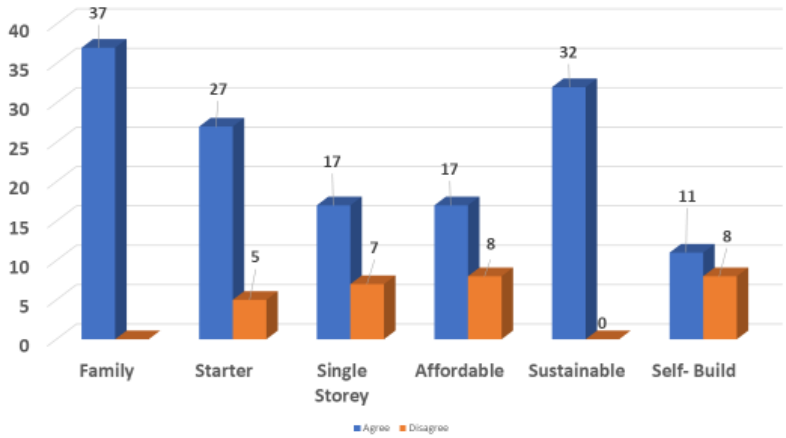
16 (17%) disagreeing. The split of views towards affordable housing and single storey was more even. Analysing the comments this appeared to be based largely on the experience of a recent development by Orwell Housing and also that single storey is associated with older people and that some viewed them as already being well catered for in the village.

7.27 A question was also asked about the style of new homes and 50 respondents (53%) indicated a preference for 'period homes' with 13 (14%) disagreeing. Sustainable homes were also popular with 50 people (53%) supportive and only 7 (7.5%) disagreeing. Contemporary, or modern homes were less popular with 19 respondents (20%) supporting the concept but with 28 (29%) disagreeing.

7.28 The March 2019 Exhibition built on the responses received in November and asked for views on the principle of a policy that encourages a mix of housing types and methods of construction. 20 respondents (57%) supported this approach with no-one disagreeing.

Policy Idea 7 – Housing Mix

	Agree	Disagree
Policy encouraging a mix of housing types and methods of construction	20	0



7.29 The March Exhibition also asked about preferred housing types. Family housing was again the most popular with 37 respondents (97%) in favour and no-one disagreeing. Starter homes were the next most popular with 27 (71%) in favour and only 5 (13%) disagreeing. The more even split of views towards

affordable housing and single storey housing was reinforced. Sustainable building was again popular 32 respondents (84%) in favour with no dissention. There was limited support for self-build 11 respondents (29%) in favour with 8 (21%) not in support and one person unsure. When analysing these results the Volunteer Group considered whether some uncertainty in the mind of the public as to the definition of self-build may have contributed to this result.

7.30 According to the 2011 Census, 38.8% of properties in Wilby have 4 or more bedrooms; this is well above the Mid Suffolk and England averages of 28.5% and 18.9& respectively. There are no one bedroomed properties in the parish; 23.3% of properties have 2 bedrooms which is slightly below the Mid Suffolk and England averages of 25% and 27.9%. 37.8% of properties have 3 bedrooms with the Mid Suffolk and England averages at 40.4% and 41.2%. 87.8% of properties in Wilby were under occupied i.e. the number of bedrooms in the property exceeded the number of occupiers. This compares to Mid Suffolk and England averages of 80.8% and 68.7%.

7.31 The average price for property in Wilby stood at £482,194 in August 2019[16]. This is a fall of 3.07% since August 2018. This is considerably higher than the figures for the whole of Suffolk, with an overall average price of £275,516 and that of England as a whole where the average house price is £242,286. The high price levels will reflect the low number of properties available, the low number of sales and also the large proportion of those that are farmhouses and therefore the figures may present a higher and misleading figure..

7.32 These figures start to reveal a picture of the housing and population composition of Wilby which indicates that the population is likely to be older and wealthier than the District and national averages and that they are occupying the larger properties. This could be a contributory factor to the consultation results indicating homes for families and starter homes (smaller properties) were required.

7.33 Mid Suffolk and Babergh's Updated Strategic Housing Market Assessment (SHMA) 2019 provides evidence and context for future housing needs within both districts looking at both open market and affordable sectors balanced against population trends and forecasts. The SHMA (Part 2) identifies the mix of housing required to 2036 in terms of the size and tenure. The SHMA projects that there will continue to be a decline in couple households with children whilst other households will continue to grow. For Mid Suffolk the

[16] Data extracted from Zoopla 18.08.19

overall profile of affordable housing appropriate to meet the population over the plan period derived from Local Housing Need is: 12.7% of housing to be Affordable Rented and 10.0% affordable home ownership (of which 5.8% could be Shared Ownership and 4.2% Starter Homes and reflects the mix of housing that would best address the needs of the local population.

7.34 In terms of size of housing needed, the greatest need is for two, three and four bedroom owner occupied accommodation. However, whilst individually the need for these sizes and tenures is higher than for other sizes and tenures, they equate to just over half of total need in Babergh and just below two thirds of total need in Mid Suffolk.

WIL7:	**Housing Mix** Support will be given to the provision of a wide range of types of housing that meet local needs and enable the creation of a mixed, balanced and inclusive community. In line with the latest evidence of need new developments should include : • Family housing 2-3 bedrooms • Starter homes/homes for first time buyers • Affordable Housing[17]** Support will also be given to the following housing construction methods: • Self-build or Custom Built Housing[18] • Sustainable Construction[19] • Accessible, Adaptable and Lifetime homes[20] *It should be noted that the above housing types may not be suitably accommodated on every site.

[17] Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market – see Glossary for full definition

[18] Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing

[19] Sustainable construction means designing, renovating or converting a building in compliance with environmental rules and energy-saving methods.

[20] Homes that are built using 16 specific design criteria which allows them to be easily adapted for use by older or disabled people

	**Paragraph 63 of the NPPF 2019 states that provision of affordable housing should not be sought for residential developments that are not major development (10 dwellings).

Design

7.35 One of the determinants of whether any new development is successful or not, will be dependent upon how well it is received by the local community. Often the key judgement will be whether the new development is considered to integrate with its surroundings. Matters such as design, impact on local character, layout and scale are the most common issues that will cause a local community concerns about any impending new development. It will also make it reticent about accepting further development in the future. If a community believes that is has been involved with and been able to influence the design of a development at an early stage, the higher the likelihood that the development will be considered to be acceptable.

7.36 Whilst to an extent design and impact on local character are subjective judgements these can be influenced by breaking design elements down into component parts and attempting to address them. The details of a building are the individual components and how they are put together. Some are a deliberate part of the appearance of a building, including doors, windows and their surrounds, porches, decorative features and ironmongery. Others are functional, although they can also contribute to the appearance of a building. These include lighting, flues and ventilation,

7.37 Small design details can make a significant difference to the overall appearance of a development e.g. overhanging eaves and verges can make the overall height of a building seem lower as they 'anchor' it to the ground. Whether a proposed new development is 'in keeping' with what is already there is one of the most common judgments to be made, yet there is often very little evidence or guidance to assist local people in making that judgement.

Wilby 'Vernacular' or "local character"

7.38 The term 'vernacular' is commonly used to describe the local architecture or style of a place; definitions of the word vary, but according to some in addition to it referring to ordinary and domestic buildings it also means using local materials and skills, and therefore ceased to have true meaning once bricks

and tiles started to be imported in the 17th century. Therefore reference here maybe more accurately relative to the style or character of the village.

7.39 Wilby is typical of small Suffolk villages, in containing a mix of dwellings constructed from around the 16th century to the present day. The oldest houses are timber framed and would originally have been infilled with wattle and daub and covered with a sand/lime or chalk/lime render under thatched roofs. Whilst they have been altered to varying degrees over the years and in some cases partially bricked up they mostly retain a smooth render external finish and some roofs are still of thatch or later clay pantiles or plain (small rectangular) tiles.

7.40 With timber becoming scarcer, and bricks available from the 17th century onwards, dwellings were more often of solid masonry construction and eventually of cavity brick and block, though more recent times have seen a return to painted rendered finishes.

7.41 Contemporary is a word often misunderstood and often used in the sense that something may be very modern or cutting edge. Dictionary definitions refer to “of the same time” or “modern” as in relating to the present time. In this respect there are no known copies of dwellings from a different period in the village and so they can all be considered as contemporary at the outset; they are of their own time.

7.42 There are cues to Wilby’s past in many of the more modern properties such as horizontal bar windows (though double glazed), pantiles (albeit concrete), use of black (though painted not tarred) boarding and one and a half storey designs but the properties that use these features are not copies of earlier ones. They are of more modern layout and shape but incorporating earlier elements which their designers considered made them fit acceptably with the existing built form, this was very common in the last part of the twentieth century.

7.43 This has not always been the case. For most of the 500 years or so that cover the homes in the Parish, the styles are a result of what the owners desired, coupled with what was available in the way of materials and labour at the time. Once people became more mobile, fashion and influence would have played a part too. In terms of style, generally C21st century architecture looks to be gradually returning to being properly of “its” own time” and is being influenced by the desire for sustainability and energy conservation. The phrase “in keeping” is often used but can be interpreted to mean either a

close copy (or incorporating features) of the style the object relates to or something in a very different style but is sympathetic to the other, or in other words sits well with or alongside it.

7.44 In summary Wilby is much like most other small Suffolk villages. There is no obviously defining and individual style as such. The dwellings are a mix of styles and types evolving over a period of around half a century reflecting the occupants' needs and the changing demographic.

7.45 It was clear from comments made at the November 2018 Exhibition, that the issue of design was an issue that local people felt strongly about. Some recent new developments in the village were not considered by some residents to be good examples.

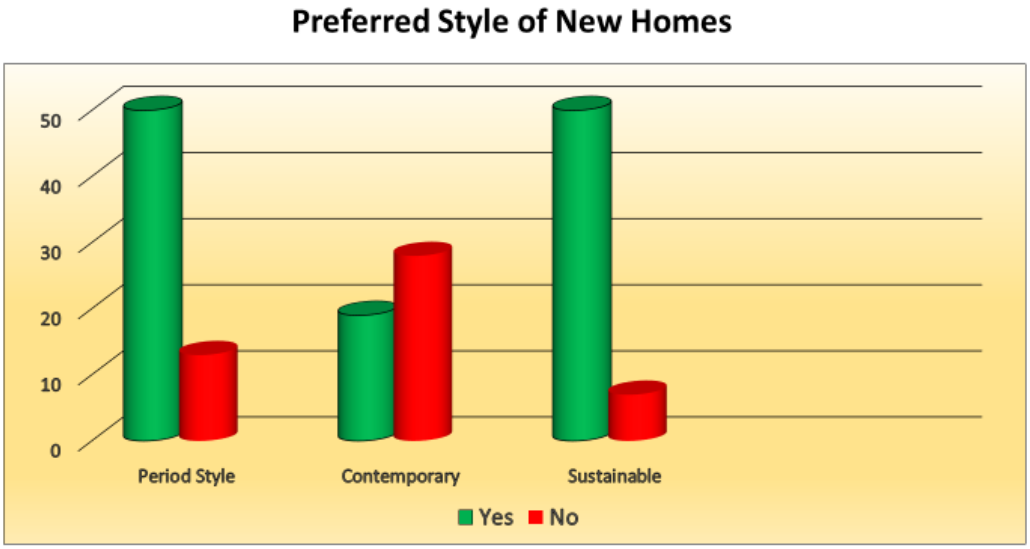
7.46 Government guidance places considerable emphasis on achieving well-designed places. Paragraph 124 of the NPPF describes it as fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development proposals acceptable to communities. Effective engagement between applicants, communities and local planning authorities is essential.

7.47 Paragraph 125 of the NPPF states 'Design policies should be developed with local communities so that they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics.' Neighbourhood Plans can play an important role in identifying the special qualities of an area and how it should be reflected in development.

7.48 Through the consultation exercises residents were asked about their views on various design elements and expressed some clear preferences in terms of the design of new development. At the November 2018 Exhibitions the community was asked an open question about the 'style' of new homes that they would like to see and clear preference for 'period style homes' was expressed by 50 respondents (52%) with 13 (14%) disagreeing. There was less support for contemporary/modern design 19 respondents (20%) in support of that style with 28 respondents (29.5%) in disagreement. The results identify a potential tension between a preference for 'period style' and 'sustainable' homes. Some of the comments left at the exhibition help to contextualise these results:

- "…must be in keeping with the local area and pre-existing buildings"

- “good design houses in keeping with older properties”
- “would not like to see extreme modernist style housing…”
- “no ‘mock period’ style homes”
- “no postage stamp gardens and plenty of parking”

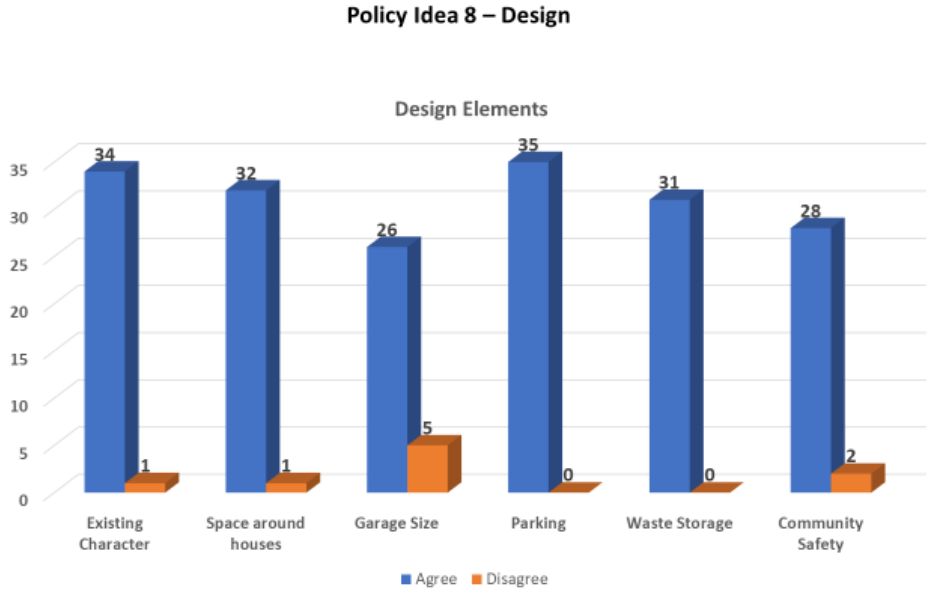


7.49 The March 2019 Exhibitions built on the comments made in November and asked for views on some specific design elements. Matters such as parking, garages, external storage, room for wheeled bin storage, road layouts, closeness of dwellings and the visual appearance of the edges of development have been considered in detail. Comments made included the following:

- “High quality design and detail that stands the test of time”
- “”important to have adequate space for cars, not necessarily garages”
- “space around the houses – recent developments are too close..”
- “reflect vernacular of existing developments nearby and materials”
- “All properties should be in keeping.”
- “Please do not build houses with all different coloured rendering – they look like a pattern card “
- “Garages not necessary for all houses. People don’t necessarily park in them”.
- “Parking space needed”.

- "Proportions should be right, windows, overhang shape, different heights, orientation, colour, texture, shape etc "
- "Cutting edge modern design of a high quality; environmentally friendly"

The results are shown below:



7.50 The NPPF indicates that planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of the area and the way it functions. Therefore the following policy has been devised with this in mind.

WIL8	**Well Designed Development** All new housing developments should reflect Wilby's local distinctiveness and character and seek to enhance its quality. Emphasis should be placed on the use of high quality, sustainable materials. New developments should respect the scale and character of existing and surrounding buildings, reinforcing local development patterns, the form, scale, massing, and character of adjacent properties where this provides a positive contribution**.**

This can be achieved where development proposals:

a) provide for a density compatible with that existing in the immediate locality;
b) respect the established building arrangements of residential front gardens, walls, railings, or hedges; where this would not compromise highway safety;
c) ensure that the design of highway infrastructure such as junctions and footways, does not adversely affect the character of the area;[21]
d) ensure that the proposed heights of buildings are appropriate to the character of the area and do not impact upon the amenity of adjoining residents through overlooking;
e) include soft well-landscaped, soft boundary edges where adjacent to open countryside or edge of settlement;
f) integrate with existing development, in terms of footway connections;
g) avoid overdevelopment by ensuring that a residential plot can accommodate the needs of modern dwellings with usable garden space;
h) provide sufficient external amenity space for refuse and recycling storage,
i) accommodate off-street parking for residents; in accordance with the Suffolk Guidance for parking,
j) provide for the appropriate landscaping of parking areas;
k) minimise the loss of trees and hedgerows to enable necessary road access and visibility splays and provide replacement planting;
l) have regard to the guidance in Secure by Design[22] to minimise the likelihood and fear of crime.

Proposals for innovative and contemporary design which respects the character of the area and promotes the use of sustainable and high quality materials will be supported.

Development should protect and where possible enhance Public Rights of Way through the inclusion of new or improved routes and connections.

[21] See also paragraph 7.17 .Useful guidance in Manual for Streets 2 https://tsrgd.co.uk/pdf/mfs/mfs2.pdf and
[21] Historic England Guidance https://historicengland.org.uk/images-books/publications/streets-for-all/

[22] Secure By Design - http://www.securedbydesign.com/

Historic Environment

7.51 The parish of Wilby has 30 Listed Buildings. These include the Church at Grade I, Wilby Hall, Wilby Manor, a range of farmhouses and a grouping of cottages close to the core of the village close to the Church. There is no Conservation Area and therefore the only historic buildings or structures in the parish that have any degree of protection are those on the statutory list.

7.52 The Government's Planning Practice Guidance (PPG)[23]recognises that there are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'. The PPG goes on to explain that these can be identified through Local Plans (and now most commonly through Neighbourhood Plans) and are a positive way for the local planning authority to identify non-designated heritage assets against consistent criteria so as to improve the predictability of the potential for sustainable development.

7.53 The NPPF 2019 at paragraph 198 indicates that the effects of an application on the significance of a non-designated heritage assets should be considered when determining applications. Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of

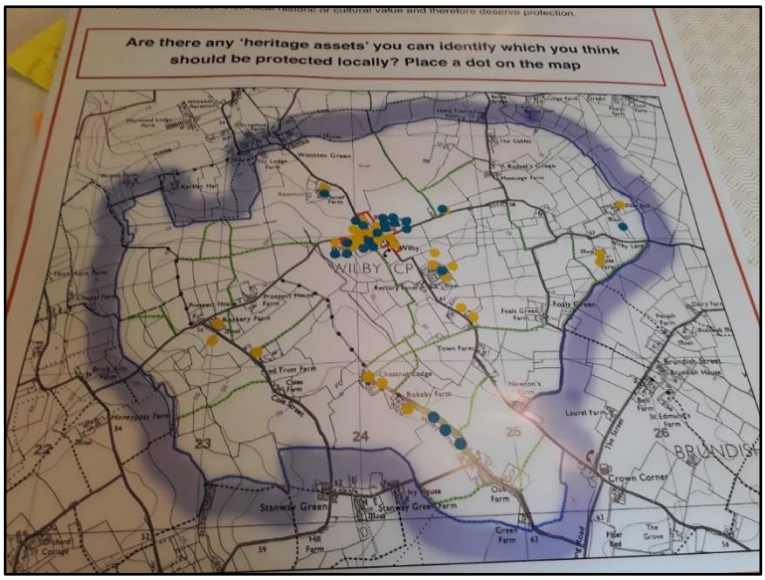
[23] https://www.gov.uk/government/collections/planning-practice-guidance

proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the NPPF and Local Plan policies are met.

Old Church Cottages

7.54 Mid Suffolk District Council does not currently have a local list of non-designated assets but has supported the identification of non-designated heritage assets through Neighbourhood Plans. This Neighbourhood Plan has separately identified a series of important heritage assets and historic features. The identification of character buildings and historic features will help to reinforce the local distinctiveness and character of Wilby ensuring that any application for planning permission takes account of the desirability of their conservation and that Mid Suffolk District Council gives them due weight in the determination of applications.

7.55 The November 2018 Exhibition, tested the appetite of the local community for identifying non-designated heritage assets in Wilby and asked for potential candidates to be identified on a map. There was considerable interest in the concept and the map is shown below:



7.56 Whilst there was clear interest in the concept of non-designated heritage assets it was also clear that there was some confusion with the nationally listed buildings in the minds of the local residents and many of the candidates put forward were already listed. The original map was also not of a scale where it was easy to identify individual buildings. The exercise was therefore repeated at the March 2019 Exhibitions with a larger map and with information on the existing listed buildings available. The exhibition also sought feedback on the potential for the inclusion in the Neighbourhood Plan of a policy covering non designated heritage assets. There was no dissention from this proposed policy idea at all from those attending and some detailed comments on some of the suggested assets were also received. Four candidate buildings were put forward. These were:

- Willow Farmhouse – an application has been made to MSDC for this building to be investigated for potential National Listing
- Trust Farm
- Town Farmhouse – formerly listed Grade 3 under the old listing categories.
- No 2 Church Farm Cottages

7.57 All four candidates were investigated by the Volunteer Group. In respect of No 2 Church Farm Cottages, the building is one of a pair of former farmworkers cottages. No 1 had not been nominated and there have been some alterations to the original building over time. In addition, the original setting of the pair has been interrupted by adjacent new build. It was therefore decided not to

include this nomination in the policy. In respect of Trust Farm, the Volunteer Group has been unable to find sufficient information to enable an assessment to take place and therefore this nomination has also not been taken forward into the policy. A justification for each of the two remaining nominees listed in **Policy WIL9** can be found in **Appendix G** where they have been assessed against the English Heritage Listing Criteria.

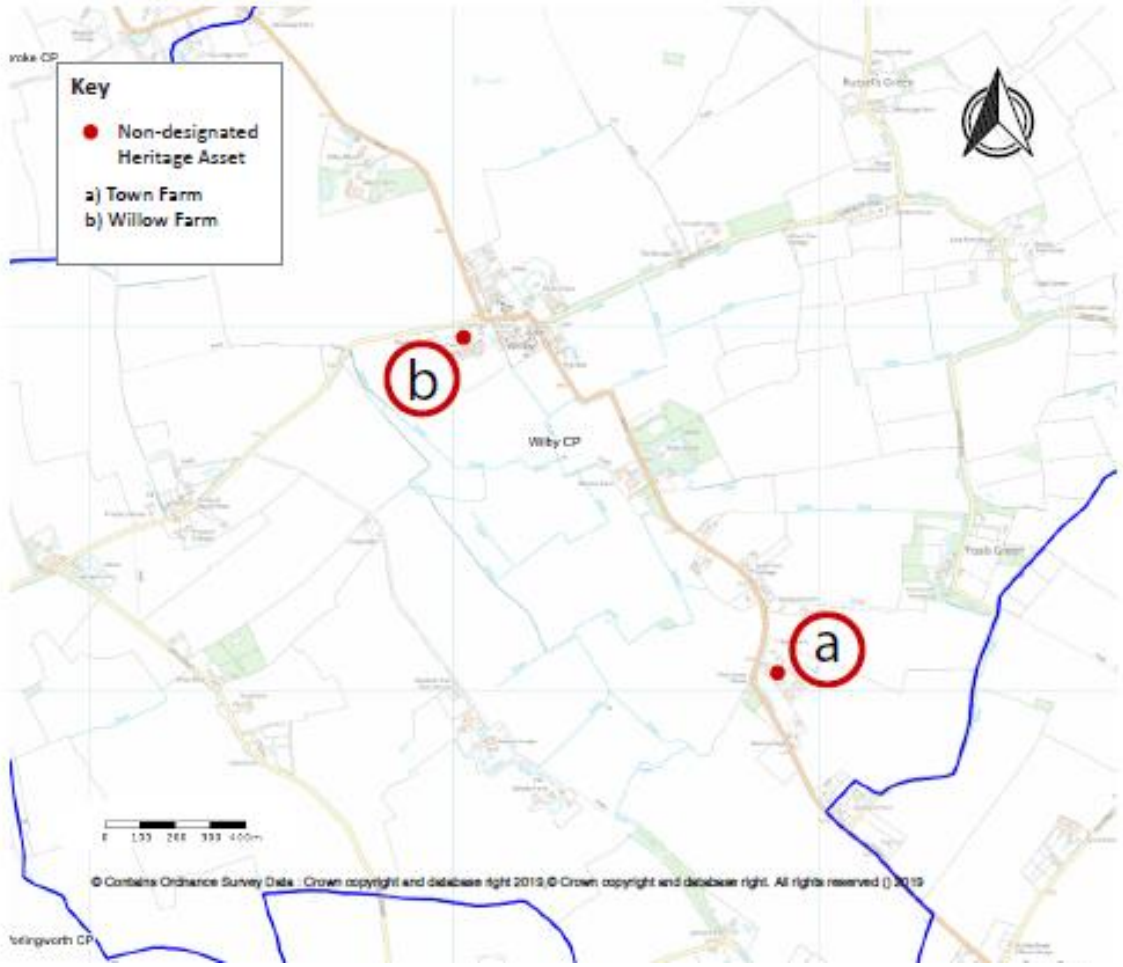
WIL9	**Non Designated Heritage Assets** The following buildings (as shown on Map F i, ii and iii) are identified as Non-Designated Heritage Assets due to their locally important character and historic features: a). Town Farmhouse and Barn b). Willow Farmhouse and Ancient Barn

Town Farmhouse and Barn

7.58 The farmhouse was formerly a Grade III Listed Building, thought to have been dropped from national listing when the lists were revised. Town Farm is an early C16th small timber framed hall house, probably commissioned by a yeoman farmer. It has been much altered, a chimney and central floor inserted in the C17th which was not unusual at that time. Then probably not a great deal more development, until the late C20th around 1970 when a two storey extension was added to the north side to provide up to date facilities and better access to the first floor. Notwithstanding the significant alterations the timber frame has historical value.

7.59 The four bay timber framed barn is believed to be of C17th origin with Victorian brick additions and some more modern alterations and repairs. The roof is of clasped purlin type and is in remarkably good condition as is often the case when these roofs are covered in “tin” as it is referred to, but actually corrugated steel. Externally the barn is clad in tarred boarding much of which is rotted or missing, internally the walls have been covered with sand/cement render on mesh up to the wall plate. The northern sole plate has been replaced with a slender section of softwood at a higher level. The crumbled remains of the southern sole plate can be seen in one or two places and the studs to this elevation remain their original length.

Map Fi) Non Designated Heritage Assets



Town Farmhouse

Map Fii) Town Farmhouse and Barn

Willow Farmhouse and Ancient Barn

7.60 A Tithe Map[24] and accompanying Tithe List[25] for the ancient Parish of Wilby dating to 1838 includes an entry for Willow Farmhouse in the ownership and occupation of William Greenard. The house itself is in the style of a Suffolk Hall House, which conforms to the typical layout. The interior has some older features which raise questions about its true age on which opinions vary from the mid-C16th to the early-C17th and it is believed to date from the mid-17th Century but probably dates from the mid C16th or early C17th. It is partially wood-framed and in parts this has been replaced with brick. It is under a pantiled roof. Some of the original windows have been replaced.

[24] (P461/289 Plot Nos. 11,12,13)
[25] FDA289/A1/1a Wilby

7.61 The barn is of wooden frame construction, originally under a thatched roof, believed to have been replaced with the current corrugated asbestos roof around 1950/1960. The size, orientation and layout of the barn appears to conform to that of a typical 17th century threshing barn. Opposing doors are found on the east and west sides of the building, with those on the western side being considerably larger. Elements of the internal wood frame have been replaced over time, but the barn retains its full character.

Willow Farmhouse

Map F iii) Willow Farmhouse and Ancient Barn

Ancient Barn at Willow Farmstead

7.62 The historical value of Willow Farmstead and adjoining barn is much appreciated locally. The farm is currently unoccupied and managed by agents although not currently being actively marketed, however any future new owner may wish to alter the building and/or develop the adjacent farmyard and buildings. The lack of occupation is considered to be an increased risk to its long term historical and aesthetic value which could be worthy of national listing. The farmhouse sits inside the current settlement boundary although the farm buildings to the rear are outside.

8 Community

Objective 3: To encourage cohesion of the whole parish by providing sufficient and suitable facilities, including support for the vibrant functioning of the school, the church and the community hall

Community Facilities

8.1 Government guidance states that planning policies should promote social interaction including opportunities for meetings between people who might not otherwise come into contact with each other and to provide the social, recreational and cultural facilities and services the community needs. Plans should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day to day needs. Shop, facilities and services should be able to develop and modernise and be retained for the benefit of the community.

8.2 Community facilities is a wide ranging definition that includes schools, pubs, shops, community buildings, sports and recreation facilities, health care facilities, open spaces, car parking areas, play areas and allotments to name just a few. Wilby has few facilities - church, school and village hall - which are all highly valued. In rural areas there may be a fine line between a viable and unviable facility. More emphasis is placed on multi-purpose facilities or buildings that can offer a wide range of services and there is also a need to match the services provided to age, gender and need profile of the community as a whole.

8.3 The November 2018 Exhibition asked a specific question: “Are there any specific issues around infrastructure which need addressing?”. A wide range of comments was received, although many raised non planning or non- land-use matters that the Neighbourhood Plan would be unable to address e.g. pot- holes, mains drainage, speeding, broadband and mobile phone signal. There was also some support for a green space/seating area adjacent to the village hall

8.4 The March 2018 Exhibition asked for feedback on the potential for the inclusion of a policy to protect the existing three community facilities and also for ideas about the potential to improve them.

8.5 There was support from 20 respondents (52%) for the policy idea about protection of facilities with only 3 (8%) not in support. There was also support for potential improvements with 29 (76%) supportive and only 1 person not supportive.

8.6 From the comments it was clear that in answering the questions the village hall was the facility that most people had in mind. This is not surprising given that the church is unlikely to physically change during the plan period. The school is widely regarded as doing well with a ‘an ‘Outstanding’ rating in three categories and ‘Good’ in a further two in its most recent inspection . The school attracts children from a number of surrounding parishes and is not suffering from some of the problems associated with small village schools in terms of viability. There are no known needs for either expansion or contraction of the school.

8.7 As already mentioned, the Village Hall is a popular and well used facility and has attracted funding from external sources in recent years such as Big Lottery Fund, Adnams, Transforming Suffolk, Section 106, County Corporative Regeneration Fund, Mid Suffolk Grant Aid and Transforming Suffolk Community Fund which have all helped to improve the internal appearance of the building and for external maintenance to be undertaken However there was a view expressed through the consultation that there may be a need for an eventual replacement or new facility which could be combined with some communal outdoor open space or play space for community use. Currently there is no such provision within Wilby. There are also parking issues associated with the school at peak times when the village hall car park is used and can become congested.

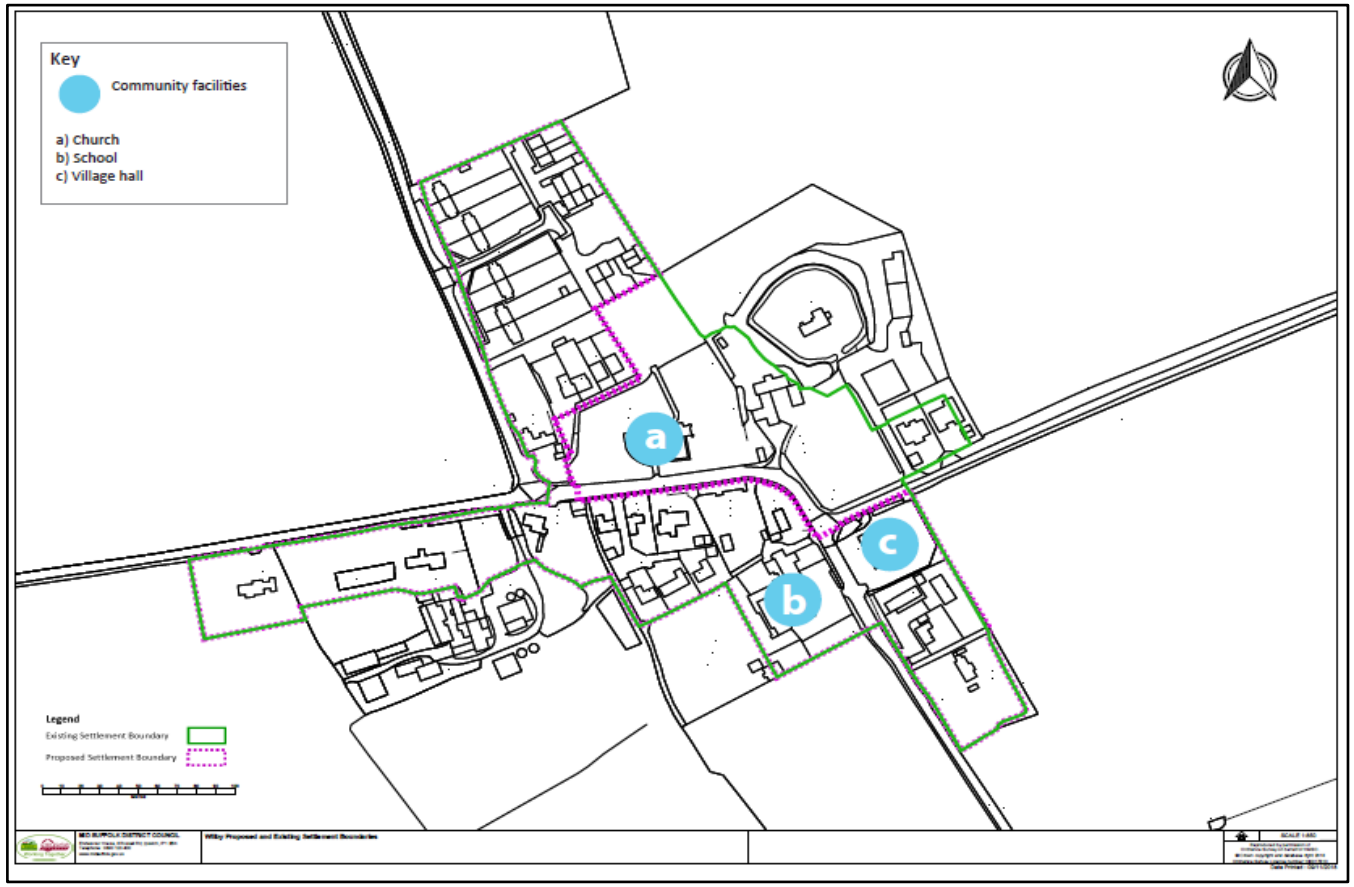
8.8 The Village Hall site lies within the settlement boundary and therefore the principle of redevelopment of the site is already acceptable in principle, but only if new provision for a new village hall site is made. Given the length of the plan period up to 2036, it is possible that a need could be identified for a new

village hall. However, there are currently no firm proposals nor has an need been identified and therefore a supportive policy that would allow for proposals to develop during the plan period is considered appropriate. However it is essential to ensure that the community does not experience a hiatus without access to a hall and therefore it is the intention to ensure that a new hall is in place before the current hall is replaced

8.9 The policy below seeks to ensure that existing community facilities are protected from development which may result in their loss, impact upon their viability or erode their value to the community. It also seeks to ensure that any new community facilities are designed to maximise their value, attractiveness and safety to both new and existing residents. Suffolk County Council advise that any future redevelopment of the hall site may also require a planning condition relating to archaeology on any consent as the site is within the historic settlement core,

WIL10	**Community Facilities** Proposals for change of use involving a potential loss of an existing community facility on the same site or elsewhere (Village Hall, Church or School), will only be supported where an improved or equivalent facility can be located elsewhere in the parish in an equally convenient, safe and accessible location or where there is no reasonable prospect of continued viable use and this can be sufficiently demonstrated. Support is given by the community for maintaining, developing and improving the services and facilities offered by the Village Hall, the Church and the School. This may include the creation of a new Village Hall, on the existing or an alternative site, should the need be identified during the plan period. Any new facility should be well designed and provide safe and convenient access, sufficient parking and outside amenity green space for community use. Proposals for the redevelopment of the existing site that would provide parking for use in conjunction with the school will be supported. **See Map H**

MAP H - COMMUNITY FACILITIES



9: Implementation and Monitoring

Implementation

9.1 The Wilby Neighbourhood Plan has been developed to assist with the planning of sustainable growth across the parish for a period up to 2036. The implementation of Wilby Neighbourhood Plan will require the co-ordinated input and co-operation of a number of statutory and non-statutory agencies, private sector organisations, landowners and the local community.

9.2 Alongside other strategic documents and policies, the Wilby Neighbourhood Plan is intended to provide a starting point for working together to implement positive sustainable growth in the parish.

9.3 The policies in this Neighbourhood Plan shape the way in which development will happen within the parish of Wilby. Some of the policies included within the Wilby Neighbourhood Plan have a delivery element, often a requirement of development or 'planning obligation'. Planning obligations(often referred to as section 106 agreements) are legal agreements negotiated between the District Council and a developer or landowner (usually in the context of a planning application). Planning obligations are typically used to ensure that new developments:

- Comply with planning policy ---for instance, by requiring affordable housing or public open space to be provided; and

- Do not impose undue burdens on existing facilities --- for instance, by requiring financial contributions to improve local services such as schools, libraries or transport.

9.4 In order to see delivery realised, it will require Wilby Parish Council and partner organisations to be proactive in getting the best results for Wilby. Working in partnership with the District Council and Suffolk County Council will be particularly important regarding strategic matters such as addressing traffic and highway safety issues.

9.5 The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, to help deliver infrastructure to support the development of the area. Mid Suffolk District Council has introduced CIL which currently operates at 15% although Wilby Parish Council will benefit from 25% of the levy revenues arising from development that takes place in Wilby, once the Neighbourhood Plan is made (adopted).

9.6 In addition to its role as part of the statutory Development Plan, the Neighbourhood Plan will be the key document used by Wilby Parish Council in formulating their responses to Mid Suffolk District Council in respect of consultations on planning applications.

Monitoring

9.7 A formal review process in consultation with the local community and the District Council should be undertaken at a minimum of every five years, to ensure that the Plan is still current and remains a positive planning tool to deliver sustainable growth. In order to determine when a review is necessary, the District and Parish Councils will monitor development in Wilby along with the local and national policy and legislative context.

9.8 It is understood that the Wilby Neighbourhood Plan will require review during its life and that it will be the role of the Parish Council to update the Neighbourhood Plan at the appropriate time. Some of the first Neighbourhood Plans that were “made” (adopted) across the country are now in the process of review and alteration.

9.9 The Parish Council will report annually on the implementation of policies, and the progress made on taking forward any Community Action Projects.

Appendices

Appendix A: Volunteer Group Members

- Stuart Banks , Joint Co-ordinator and Wilby resident
- Paula Barham, Wilby resident (until December 2019)
- Carl Berry, Wilby resident
- Jeremy Bisshopp, Wilby resident (until December 2019)
- Karen Collins, Parish Councillor and Wilby resident
- Robin Cross, Parish Councillor and Wilby resident
- Brian Jacquest, Wilby resident (until Spring 2019)
- Josette Jacquest, Wilby resident (until Spring 2019)
- Steve Lee, Joint Co-ordinator, Parish Councillor and Wilby resident
- Alison Walls, Parish Footpath Warden and Wilby resident

Supported by :

- Ian Williamson, Chairman of Wilby Parish Council
- Andrea Long, Consultant

COMPASS POINT • PLANNING AND RURAL CONSULTANTS

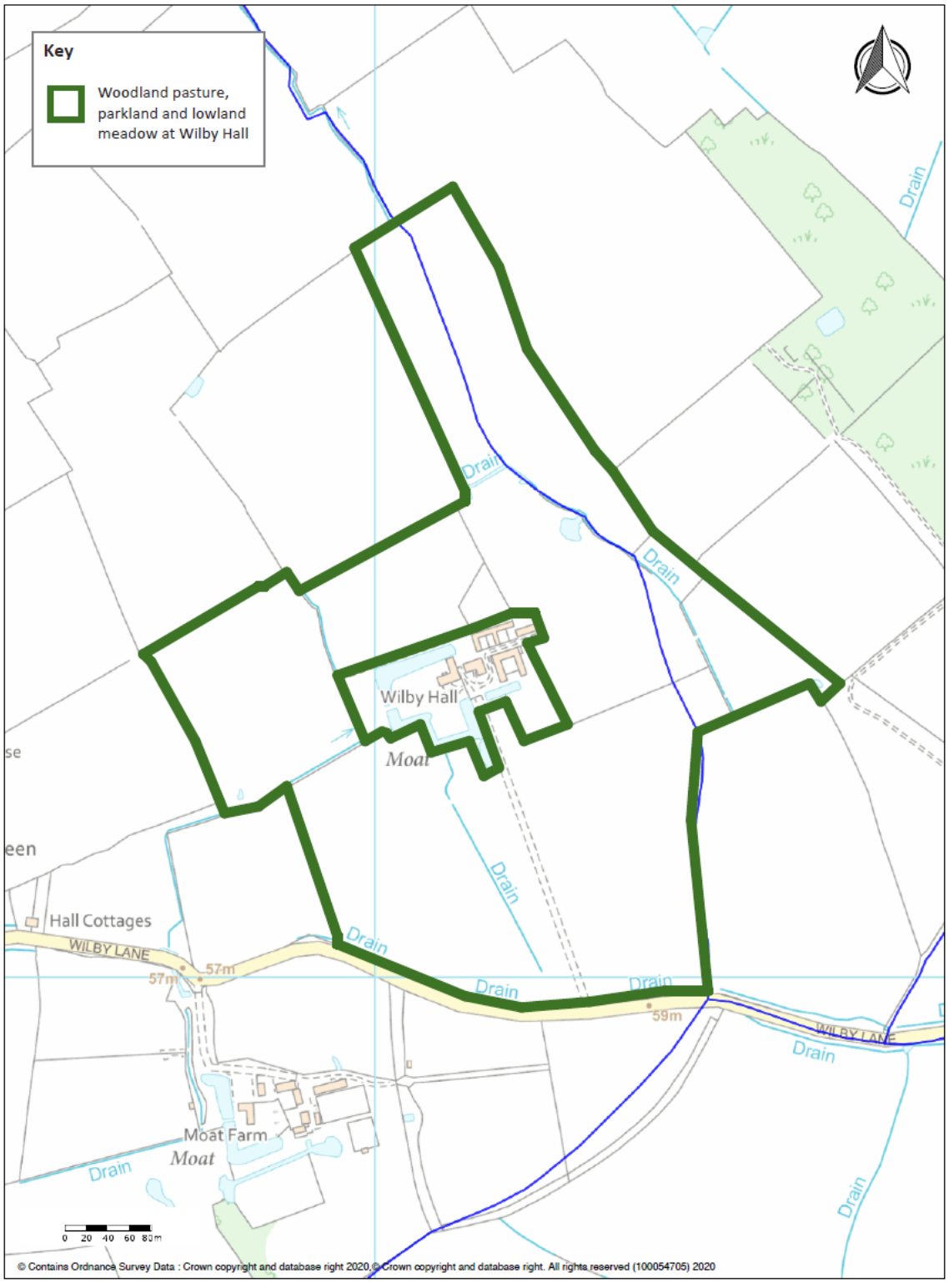
,

Appendix B: Natural Features Maps

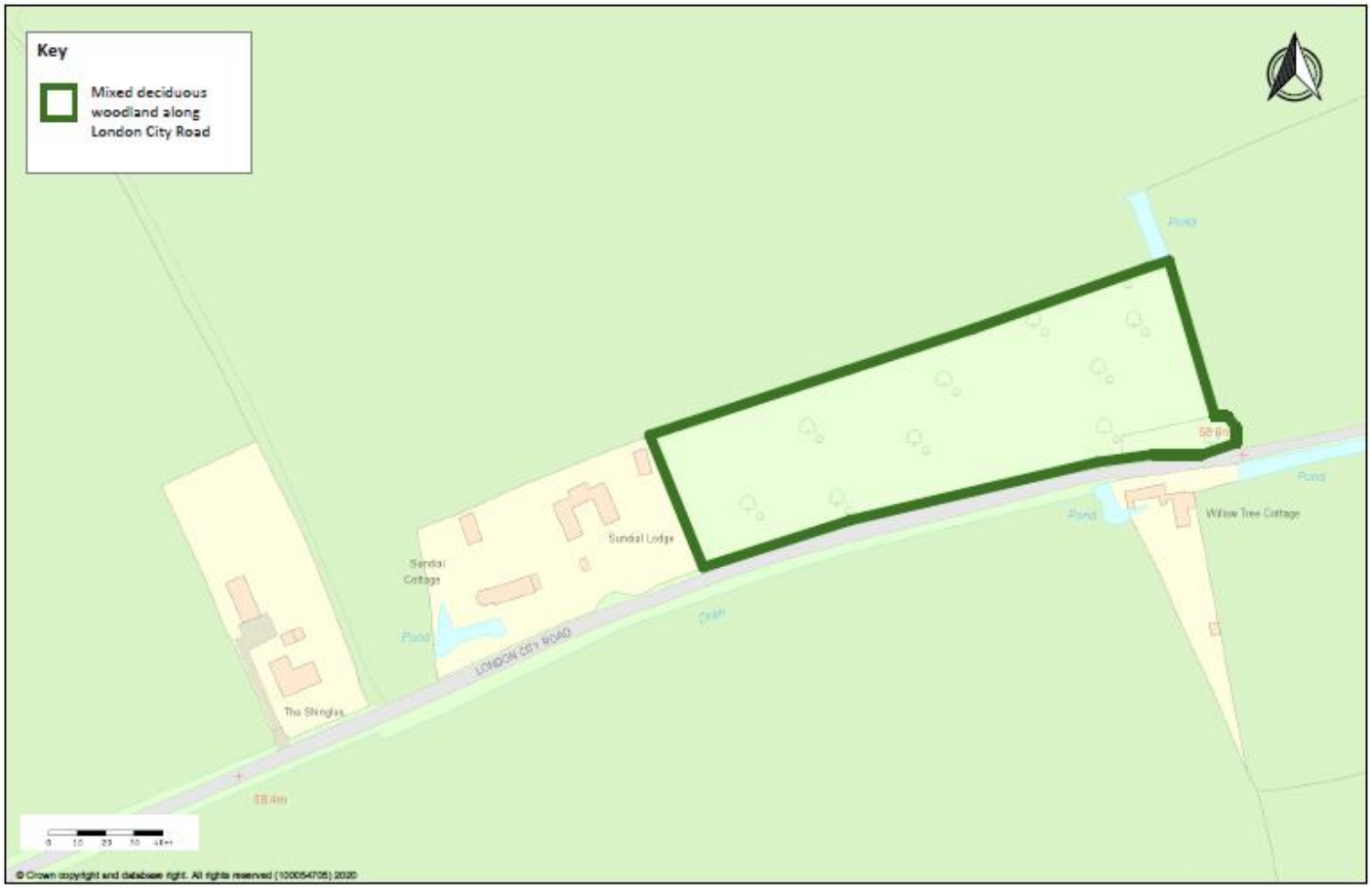
i) Traditional Orchard and mixed deciduous woodland at Wilby House

ii) Traditional Orchard at Rookery Farm

iii) Woodland pasture, parkland and lowland meadow at Wilby Hall

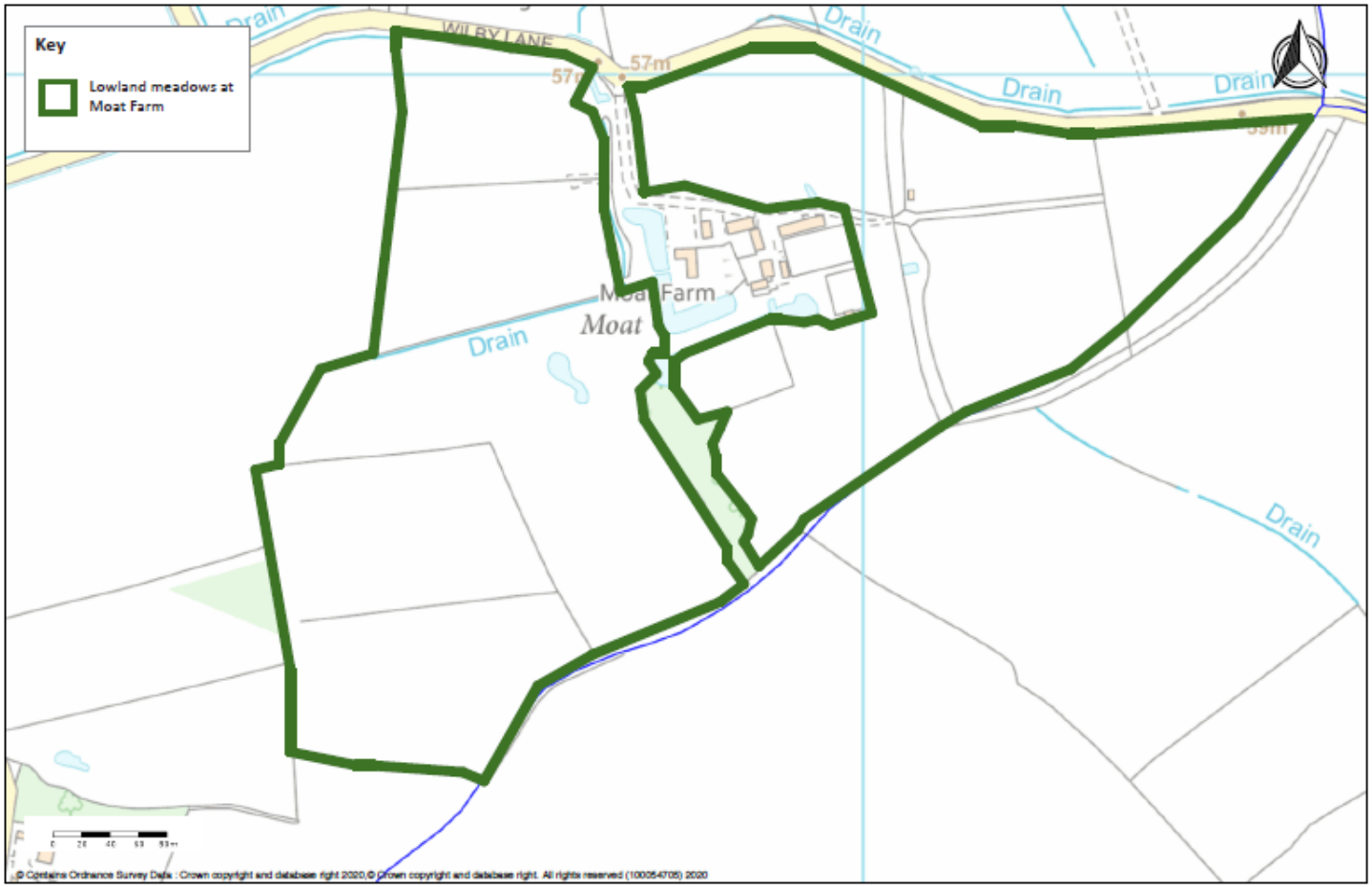


iv) Mixed deciduous woodland along London City Road



v) Mixed deciduous woodland at Foals Green

vi) Lowland Meadows at Moat Farm



vii) Wilby Green

Appendix C : Local Green Space Assessments

The table below outlines the justification for the inclusion of each Local Green Space identified. The criteria are based on paragraph 100 of the National Planning Policy Framework 2018

	Name of Green Space	Green space is in reasonably close proximity to the community it serves	Green space is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquility or wildlife value	Green space is local in character and not an extensive tract of land	Comments	LGS – Y or N
A	Junction of Worlingworth Road/Stradbroke Road	Yes - Relatively close to centre of settlement, houses opposite	No - Agricultural land No specific community value except that it is undeveloped	No – large tract of agricultural land – no smaller boundaries		No
B	London City Road (north side)	No - Not particularly close to or accessible to the main core of the village; very little adjacent development	No - Agricultural land No specific community value except that it is undeveloped	No - large tract of agricultural land – no smaller boundaries		No

C	London City Road (south side)	Yes - Close to village hall but not core of village	No - Agricultural land No specific community value except that it is undeveloped	No - large tract of agricultural land – no smaller boundaries		No
D	Brundish Road, Adjacent School	Yes - Adjacent to the school, close to public footpath so is accessible	No - Agricultural land No specific community value except that it is undeveloped	No - large tract of agricultural land – no smaller boundaries		No
E	Rear of Willow Farm	Yes - Behind existing development	No – former farmyard/agri use – no discernable community value	No – large tract of land		No
	School Playing field	Yes, close to village core and adjacent to school;	Yes – recreational and wildlife value as school playing field and Forest	Yes – not a large tract of land		Yes
	Land surrounding church including churchyard	Yes, close to village core, church is in the centre of the village	Yes – historical value as setting of church and use as churchyard; visual value as setting of church and affording views across to the church	Yes - not a large area of land	Previously protected in Local Plan as open space	Yes

Appendix D – Housing Commitment

Planning Reference	Site Address	Date of Approval	No of unimplemented dwellings at 1st April 2018	Source
M/3300/12/FUL	Barn at Prospect House Farm, Worlingworth Road	21/08/2008	1	BMSDC SHELAA July 2019
M/1895/10/FUL	Land to west of Chestnut Lodge Farm	24/09/2010	1	BMSDC SHELAA July 2019
M/0357/15/FUL	Green Farm, Wilby Green	30/03/2015	1	BMSDC SHELAA July 2019
M/1651/15/PRN	Rattlerow Farms Ltd, Manor Farm, Wooten Green	25/06/2015	1	BMSDC SHELAA July 2019
M/0640/16/FUL	Town Farm, Stradbroke Road	05/04/2016	1	BMSDC SHELAA July 2019
DC/17/04603/PRN	Bullrush Barn Unit 1, Messuage Farm, Russell Green	27/09/2017	1	BMSDC SHELAA July 2019
DC/17/04054/PRN	Cowslip Barn Unit 2, Messuage Farm, Russell Green	05/10/2017	1	BMSDC SHELAA July 2019
DC/19/02803/FUL	Rookery Farm. Worlingworth Road	10/10/2019	4	**BMSDC Planning Application System**
Total			11	

Appendix E – Site Heritage Impact Assessment

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	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. 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. **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.[26]

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

[26] 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	• **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	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. 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 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'[27] 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 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.

[27] See Appendix 2 for Map identifying the visual channel to the church tower

	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.3[28] 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.

[28] 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 his 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 d 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 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 form 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 E: Housing Site Assessment

Site H1 – East of Stradbroke Road

Parish/District	Wilby, Mid Suffolk
Site reference	H1
Site location	Land east of B1118
Approx Site area (ha)	0.6 ha approx
Brownfield/Greenfield	Greenfield
Existing land use	Agricultural
Neighbouring land use	Agricultural and Residential to south
Planning History	None
Proposed land use	Residential development – around 5 dwellings
Suitability	No constraints relating to flood risk, open space, no formal nature conservation designations, not in conservation area, no listed buildings in immediate vicinity, no landscape designations or known archaeology. Community Consultation: - most popular site for new development; not identified as a Local Green Space or as an important local view Immediately adjacent to existing development, scope for shared footpaths and infrastructure, definable physical boundaries on two sides. Further investigation required: Highways, including potential for footpath links with adjacent development Biodiversity – potential impact on protected species although according to SBIS no records on this site. Heritage – impact on views to church from Stradbroke Road. Site Heritage Impact Assessment has been undertaken. See Appendix D Archaeology - any consent for redevelopment would require a condition to secure a programme of archaeological work, as the site is close to the historic settlement core.
Deliverability	Site owners have formally indicated an interest in working with the community to develop the site and have supported the allocation through consultation responses.
Estimated dwellings yield	5
Delivery timetable – estimated	0-5

Appendix F – Non Designated Heritage Assets

	Name of Asset	Age	Rarity	Aesthetic Interest	Group Value	Archaeological Interest	Archival Interest	Architectural Interest	Historical Association	Designed landscape interest	Landmark Status	Social and Communal Value	Total	Rank
1	Willow Farmhouse and Ancient Barn	Mid 16th C	5	4	3	4	4	4	4	3	3	3	37	1
2	Town Farmhouse	16th C	3	3	3	3	3	3	3	2	2	2	27	2

Appendix G: Glossary and Definitions

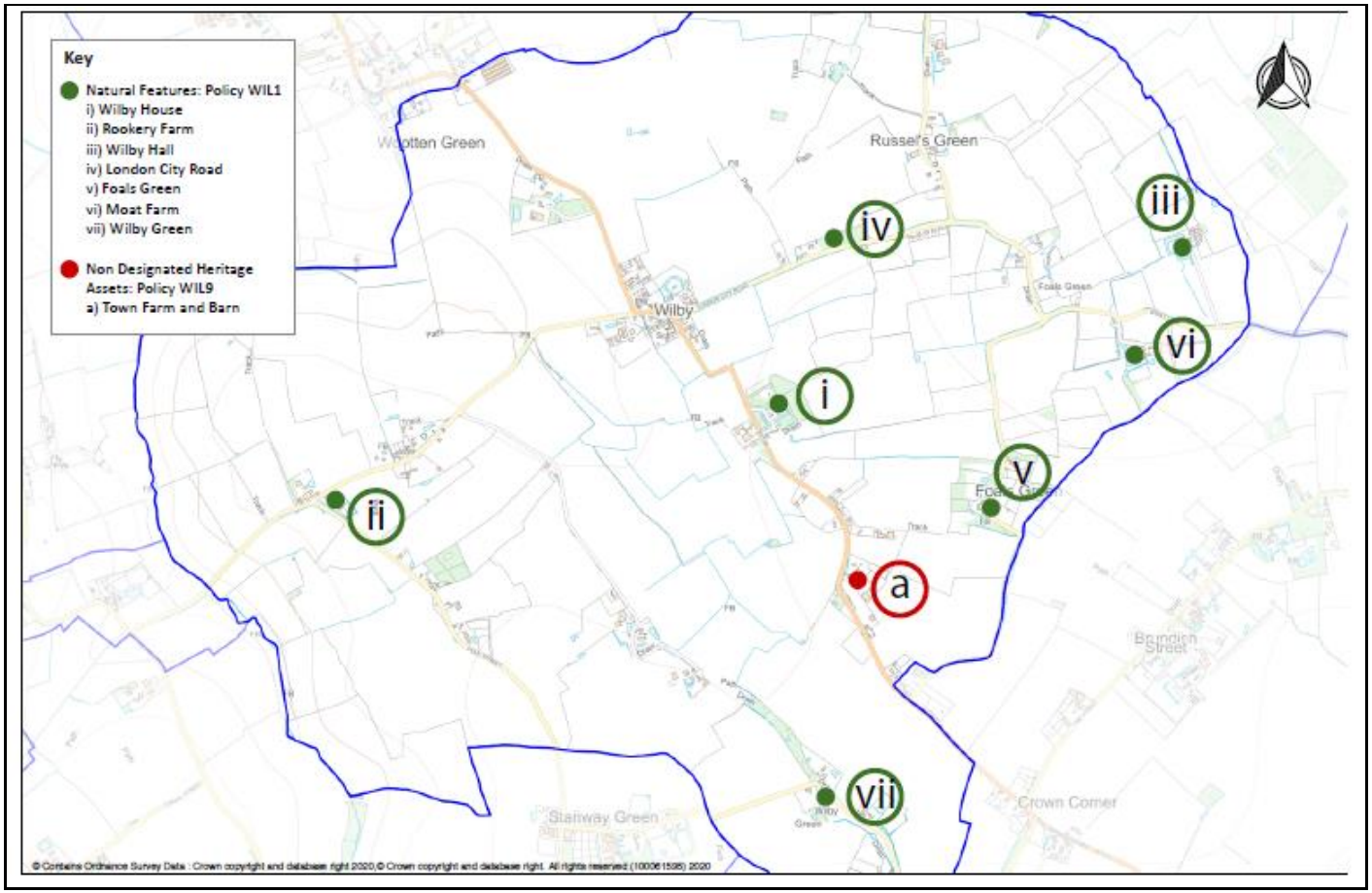
Affordable Housing	Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.
Allocation	An area of land identified for development in a development plan. The allocation will specify the type of development that will be permitted on the land.
Biodiversity	The whole variety of life encompassing all genetics, species and ecosystem variation including plants and animals.
Brownfield Land or Site	Brownfield land is another term for previously developed land.
Community Facilities	Facilities providing for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community
Conservation Area	An area of special architectural or historic interest, designated under the Planning (Listed Buildings & Conservation Areas) Act 1990, whose character and appearance are protected.
Density	Measurement of the number of dwellings per hectare and often in equivalent dwellings per acre.
Development	Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over, or under land, or the making of any material change in the use of any building or other land." Most forms of development require planning permission.
Duty to Cooperate	Local Councils now have a duty to co-operate with their neighbouring Councils and a set of prescribed bodies as defined by the Localism Act 2011 on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities
Environmental Impact Assessment (EIA)	EIA is a procedure that must be followed for certain types of development before they are granted permission. The procedure requires the developer to compile an Environmental Statement (ES) describing the likely

	significant effects of the development on the environment and proposed mitigation measures.
General Conformity	All planning policy documents must align with the expectations of the National Planning Policy Framework. This is known as general conformity.
Greenfield Site	Land that has not previously been used for urban development. It is usually land last used for agriculture and located next to or outside existing built-up areas of a settlement.
Habitat	The natural home of an animal or plant often designated as an area of nature conservation interest.
Infrastructure	Basic services necessary for development to take place, for example, roads, electricity, sewerage, water, education and health facilities.
Landscape Character Assessment	A tool to identify and understand the factors that give character to the landscape and to help inform policy and decisions about how the landscape may change in the future.
Listed Building	A building or other structure of Special Architectural or Historic Interest. The grades of listing are grade I, II* or II.
Local Development Framework (LDF)	The old-style portfolio or folder of Development Plan Documents and Area Action Plans which collectively set out the Spatial Planning Strategy for a Local Planning Authority area. Local Plans have now replaced the Local Development Framework.
Local List	A list of buildings identified for their local historic, architectural or cultural contribution to the character of an area. The Local List is compiled and adopted by the Local Planning Authority
Local Green Space	An area of green space that is demonstrably special to a local community by way of its beauty, historic significance, recreational value, tranquility or richness of its wildlife (see NPPF 2018 paragraph 100)
Local Nature Reserve (LNR)	Area designated under the National Parks and Access to the Countryside Act (1949) as being of particular importance to nature conservation and where public understanding of nature conservation issues is encouraged.
Local Plan	The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the

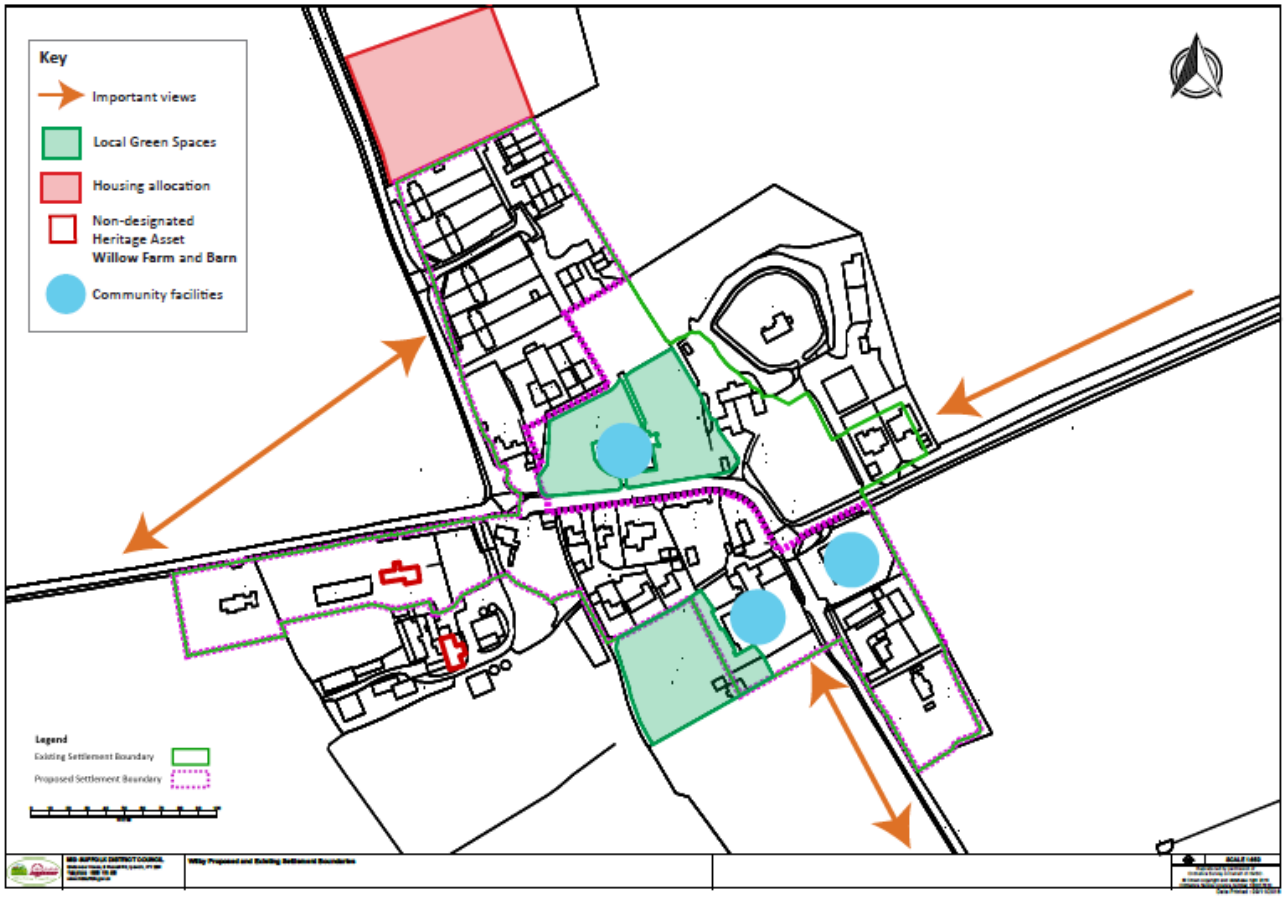
	Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Local Planning Authority (LPA)	The Local Government body responsible for formulating Planning Policies in an area, controlling development through determining planning applications and taking enforcement action when necessary. This is either a District Council, Unitary Authority, Metropolitan Council or National Park Authority.
Material Consideration	A matter that should be taken into account in deciding on a planning application or on an appeal against a planning decision.
Mixed Use (or Mixed-Use Development)	Provision of a mix of complementary uses, such as residential, community and leisure use, on a site or within a particular area.
Nature Conservation	The protection, management and promotion of wildlife habitat for the benefit of wild species, as well as the communities that use and enjoy them.
National Planning Policy Framework (NPPF)	The NPPF forms the national planning policies that Local Planning Authorities need to take into account when drawing up their Local Plan and other documents and making decisions on planning policies. The NPPF is published by the Department of Communities and Local Government.
Neighbourhood Plans	A Plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
Non Designated Heritage Asset	These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'.
Open Space	Open space is defined in the Town and Country Planning Act 1990 as 'land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground'. Open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes

	and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity.
Planning Condition	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order
Planning Obligation	A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
Protected Species	Plants and animal species afforded protection under certain Acts of Law and Regulations
Section 106 Agreement	A legal agreement under Section 106 of the 1990 Town and Country Planning Act. See also: Planning Obligations and Agreements.
Site of Special Scientific Interest (SSSI)	A SSSI is identified by Natural England as requiring protection from damaging development on account of its flora, fauna, geological and/or physiological features.
Strategic Environmental Assessment (SEA)	A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
Sustainable Development	Meeting peoples' needs now, socially, environmentally and economically, without jeopardising the needs of future generations. There are three dimensions to sustainable development as seen in paragraph 7 of the NPPF: - economic contributing to a strong, competitive economy; - social-supporting strong, vibrant and healthy communities and – environmental contributing to protecting and enhancing the natural, built and historic environment.
Sustainability Appraisal (SA)	To identify and evaluate what the effects of the strategy or plan are likely to be on social, environmental and economic conditions of the strategy or plan area
Tree Preservation Order (TPO)	A mechanism for securing the preservation of single or groups of trees of acknowledged amenity value. A tree subject to an order may not normally be topped, lopped or felled without the consent of the Local Planning Authority

Appendix H – Policies Maps – Parish Wide Policy Map



Appendix H – Policies Maps – Village Inset Policy Map



29

[29] All photographs have been taken by Members of the Volunteer Group or the Independent Consultant