HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:
Hopkins Homes

In respect of:
Matter 3 Development Allocations (Policy SCLP12.61 Land between High Street and Chapel Lane, Pettistree)
Date: July 2019

Document Reference: GA/DJ/05017/S0011
1.0 INTRODUCTION AND BACKGROUND

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins Homes in respect of Matter 3 Development Allocations (Policy SCLP12.61 Land between High Street and Chapel Lane, Pettistree) of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 The Statement is intended to assist the Inspector’s consideration of the legal compliance and soundness of the Plan and will form the basis of the discussion at the Examination Hearing session on 17th September 2019.

1.3 Hopkins Homes are currently engaging in pre-application discussions with the Council to discuss the issues with the allocation identified in our previous representations and in particular the capacity of the site to accommodate the level of development proposed. Hopkins Homes are keen to deliver a policy compliant development on the site, but to achieve this the policy must be deliverable.

1.4 The site was first promoted by Hopkins Homes to the Issues and Options Consultation in October 2017 for approximately 100 dwellings including a landscaped tree belt to the south of the site (see representations at Appendix 1). The site was then included as a proposed allocation in the First Draft Plan (July 2018) for approximately 120 dwellings (First Draft Plan Policy 12.56) including a requirement that landscaping provide a ‘soft’ edge to the southern boundary of the site. Hopkins Homes were very happy with this draft policy and we supported it as a deliverable allocation in representations submitted on behalf of Hopkins Homes to the First Draft Plan (Appendix 2). These representations included a Landscape and Visual Appraisal (LVA) prepared by Aspect Landscape Planning that recommends that a landscaped buffer be provided to the south of site. This buffer is shown on an Opportunities and Constraints Plan in the LVA as comprising a relatively narrow strip of landscaping to the south of the site.

1.5 The Final Draft Plan was published in January 2019 and includes a revised policy (Policy SCLP12.61) that increases the site allocation to 150 dwellings, despite Hopkins Homes not requesting this change. The revised policy also adds a restriction on built form to be limited to a developed area of just 4ha, for the site to provide approximately 2.15ha of open space to create a ‘soft’ and distinctive gateway to Wickham Market and for the site to provide a 0.1ha area for a new early years setting, if needed. The Council has presented no evidence to demonstrate that these changes are justified or required. They have not conducted a landscape assessment to demonstrate that 2.15ha of open space is required to buffer the site (contrary to Aspect’s findings that a relatively narrow strip of land would suffice), they have presented no evidence on local early years education requirements, nor have they
presented any justification for the high density of development required to achieve 150 dwellings on just 4 hectares.

1.6 In our reps to the Final Draft Plan (Appendix 3), we raised serious concerns regarding the capacity of the 6.15ha site to accommodate the allocation and put forward the potential for a larger 8ha area to be allocated. Following these reps, Hopkins Homes has conducted further technical work to test whether it is possible to deliver the proposed allocation (with a housing mix that accords with that set out at Policy SCLP5.8) without changing the red line. The conclusion of this work is that it is simply not possible for the following reasons:

- To achieve 150 dwellings at an appropriate density for the character of the area would require a larger site. By way of comparison, the site to the north that was developed by Hopkins Homes provides 65 dwellings on c.3.2ha giving a density of 20 dph. To achieve the same density on this site would require 7.5ha of land. This is quite simply not possible and while Hopkins Homes consider the density could be increased slightly without impacting on local character, it is clear that 150 dwellings is too high to be accommodated on 6.15ha, while also meeting the Council’s required housing mix set out at Policy SCLP5.8 which requires 60% of dwellings to be 3 or 4+ bedroom homes. Further, if restricted to a developed area of just 4ha, we consider the site could only achieve around 80 dwellings in the required mix;

- The Council has not at any stage considered the land required for SUDs drainage infrastructure, which will be larger than would previously have been the case due to emerging Policy SCLP9.6 that gives a strong preference for above ground SuDS. Hopkins Homes are aware from other developments in the District that the Lead Local Flood Authority are strictly applying this requirement and Hopkins Homes’ consultants Ingent have therefore advised that SUDS basins would need to be provided along the site’s northern boundary as the site slopes from south to north and the north of the site has the best ground conditions for infiltration. The SUDS basins could not therefore be incorporated into the 2.15ha of open space required to the south of the site and would instead reduce the area available for residential development; and

- In addition to the requirement for 2.15ha of open space to be provided solely to the south of the site, further areas of landscaping will be necessary along the other site boundaries that will further reduce the area available for residential development.

1.7 With respect to the above, it is clear that the policy as currently worded is undeliverable. Hopkins Homes consider that the 6.15ha site could reasonably accommodate approximately 120 dwellings as per the originally policy for the site. The would allow development at an appropriate density that would also allow sufficient room for SUDs, access roads and suitable landscaping, but it would not allow for
2.1 5ha of open space to the south of the site. As set out in the LVA submitted with our representations to the First Draft Plan (Appendix 2), we do not consider it necessary for the site to provide a 2.15ha area of open space to the south of the site in order to provide a suitable landscape buffer. However, if this is Council’s desire, we recommend that it could be achieved by extending the red line to encompass the full 8ha area within Hopkins Homes’ control (as set out in our representations to the Final Draft Plan at Appendix 3).

1.8 We have discussed the proposal to expand the site area with the Council and matters are ongoing such that we are hoping to agree a SoCG with them ahead of the 17th September hearing session. The only reason the larger site area was not promoted earlier was that negotiations were still ongoing with the landowner and we can now confirm that the larger site is available for inclusion as part of the allocation. We therefore see no reason why the site area should not be expanded to enable 120 dwellings and the policy criteria for 2.15ha of open space to be achieved, but if this cannot be agreed then we consider the original First Draft Plan policy for the site to represent an appropriate and deliverable form of development.

2. ISSUE – ARE THE PROPOSED AREA SPECIFIC STRATEGIES, ALLOCATIONS AND POLICIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

Question 3.81
Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

2.1 In terms of the Policy requirement (criteria a) for the housing mix to include suitable provision to meet the needs of the elderly population, it is acknowledged that changes to the National Planning Practice Guidance (PPG) on 26th June 2019 encourage the building of more homes for such users and confirm that Plans can set out different policy requirements for different types of development. However, these policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies and local and national standards, including the cost implications of Community Infrastructure Levy and section 106 (Paragraph: 015 Reference ID: 63-015-20190626).

2.2 As set out in our representations on behalf of Hopkins Homes to Matter 4 Policies (Policy SCLP5.8 Housing Mix), the Council’s approach to meeting the housing needs of the elderly is deeply flawed. The Council has forecast the need for housing for older people, but not considered in any depth how this need should best be met. There has been little regard paid to the type of dwellings needed and almost no provision made for specialist accommodation (i.e. sheltered housing, enhanced sheltered
housing and extra care housing). This flawed approach is continued in several site allocations, including this one, that require a mix of housing that includes an unspecified proportion of housing suitable for the elderly. No evidence is presented that due consideration has been given to any actual assessed need or demand for housing to meet the needs of the older population in Pettistree and Wickham Market and it is clear from the Council’s definition of housing suitable for the elderly contained at Paragraph 5.44, that the only provision that could reasonably be expected as part of the mix on this site would be bungalows and smaller properties with larger than normal living spaces. Not only would this not meet the clear need for specialist elderly accommodation, but it would duplicate the excessive requirement at Policy SCLP5.8 for all sites to provide 50% highly accessible and adaptable homes.

2.3 Our hearing statement for Matter 4 Policies (Policy SCLP5.8 Housing Mix) concludes that the Council’s approach to meeting the housing needs of older people would be ineffective and it is clear that the Policy requirement (criteria a) for the housing mix on this site to include suitable provision to meet the needs of the elderly population would also be ineffective in meeting actual needs. It is considered that this overly restrictive criteria may serve to discourage planning applications coming forward where this policy requirement may not be appropriate for the local context and would therefore adversely affect the delivery of housing and the enabling of sustainable development.

2.4 Accordingly, it is considered that this criterion is not based upon objectively assessed development requirements nor proportionate evidence and is therefore not positively prepared or justified and should be deleted.

**Question 3.82**

*Is the provision for the specified area of land for new early years setting justified and if so, should it be specifically identified/safeguarded on the Policies Map?*

2.5 With regard to the requirement (criteria c) for land to be reserved for an early years setting on the site, the NPPF states at paragraph 35 that for plans to be considered sound, they must be justified which it defines as comprising “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” In this regard, the Plan is not supported by any evidence to demonstrate that there is a current deficit in pre-school places in Wickham Market. There is furthermore no evidence to justify how the allocation would generate sufficient demand to require the specific provision of 0.1ha or that other alternative options have been investigated either through physical expansion or longer opening hours of existing providers or the likelihood that new private sector nurseries would open to meet any increased demand.
2.6 It is interesting that the plan’s evidence base does not appear to refer to Suffolk County Council’s Childcare Sufficiency Assessment (December 2018), despite this containing what we understand to be the most up to date position with respect to the need for early years places in the County. We have attached an extract from this report at Appendix 4 which details the early years education places available in the Framlingham/Leiston Cluster area which includes Wickham Market and Pettistree. The report identifies that there is a current surplus of 66 places in the cluster which rises to a surplus of 102 when migration of children in and out of the cluster is taken into account. The report also notes that there have been several new settings opened in the last year which is clear evidence of the market responding to needs. The report does not include a specific assessment of provision in Wickham Market, but it is clear from the map provided that there is an existing cluster of early years providers in Wickham Market and Pettistree. Further, we are aware from discussions with the proprietor of Presmere Day Nursery in Pettistree that: they currently have space to accommodate new children both in their baby room and the main nursery; that within Wickham Market there is a nursery attached to the school and several childminders; in nearby Melton there are 3 well established nurseries; and in Framlingham there is a nursery attached to the school, a well-established private nursery and a new nursery that is about to open in addition to several childminders. It is therefore clear that there is more than adequate provision in the local area.

2.7 Seeking provision of a new early years setting is only justified where there is clear evidence that the private sector cannot expand to meet needs or requires support to be able to expand. The policy requirement (criteria c) has not been demonstrated to be necessary by proportionate evidence and therefore fails the tests of soundness. Furthermore, the wording ‘if needed’ is not effective as it fails to give clear guidance to the decision maker.

Question 3.83
Would the development criteria be effective in providing a 'soft gateway' to Wickham Market or maintaining the separation of Wickham Market and Pettistree?

2.8 The Policy requires the “Provision of approximately 2.15ha open space to create a ‘soft’ and distinctive gateway to Wickham Market” (criteria d) and the “Provision of landscaping and creation of a ‘soft’ edge to the southern boundary of the development” (criteria e). On the surface the policy would therefore appear to include adequate provision to provide a 'soft gateway' to Wickham Market. Indeed, the Landscape and Visual Appraisal prepared by Aspect for our representations to the First Draft Plan (Appendix 2) recommended that a much more limited landscape buffer would be effective in providing a suitable edge to the development. As set out above, however, there are clear issues with the policy in terms of the capacity of the site to accommodate the required level of development and 2.15ha of open space to the south of the site.
2.9 With respect to whether the development criteria would be effective in maintaining the separation of Wickham Market and Pettistree. Hopkins Homes recognise that there have been objections to the allocation regarding the coalescence of Wickham Market and Pettistree, but we consider that the allocation would have very little impact in this respect. There is an existing strong separation between the settlements and the definition of coalescence provided by the Planning Portal website is "The merging or coming together of separate towns or villages to form a single entity". It is clear that this would not occur as a result of the allocation and that an effective separation between the two settlements would be maintained by the policy.

**Question 3.84**

What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Wickham Market Water Recycling Centre?

2.10 The Policy requires (criteria h) evidence to demonstrate that there is adequate provision for treatment at the Water Recycling Centre or that this can be provided. In response to this requirement, we are pleased to attach at Appendix 5 a Pre-Planning Assessment Report prepared by Anglian Water. This report clearly states that:

"The foul drainage from the proposed development is in the catchment of Wickham Market Water Recycling Centre, which currently has capacity to treat the flows from your development site."

2.11 It is clear from this that there are no implications for the deliverability or developability of the site with respect to treatment capacity at the Wickham Market Water Recycling Centre and this requirement should be deleted.

**General Question**

Are there any significant factors that indicate that the site should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?

2.12 There are no significant constraints to development that indicate the site should not be allocated.

**General Question**

Is the site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints?

1 [https://www.planningportal.co.uk/directory_record/163/coalescence](https://www.planningportal.co.uk/directory_record/163/coalescence)
2.13 The site is well related to the existing settlement, there are no insurmountable constraints to development, it is in a single ownership and is subject of an option held by Hopkins Homes who is committed to delivering a high quality development on the site. The allocation of the site is therefore clearly justified, but as detailed above there are issues with the policy criteria with respect to the capacity of the site to accommodate the proposed development and the justification for requiring: housing to meet the needs of the older population; a new early years setting; and evidence to demonstrate water treatment capacity.

2.14 Discussions are ongoing with the Council to agree a SoCG with respect to the policy, but as set out in this statement we consider there to be two options to amend the policy to ensure it is deliverable. Both options would require the number of dwellings to be reduced to 120 homes, as previously proposed. The first option would then increase the size of the site to 8ha in order to achieve the Council’s objective for a 2.15ha open space on the site. Importantly this option would restrict built form to the original site area and only allow open space and landscaping on the additional part of the site. As set out above, we do not consider 2.15ha of open space to be required to create an appropriate landscape buffer to the site, but Hopkins Homes are willing to provide this area on the extended site if the Council and the Inspector agree that it would provide an additional benefit. The second option would retain the 6.15ha site area by reverting to the previously proposed policy wording that simply required the provision of landscaping to create of a ‘soft’ edge to the southern boundary of the development. As set out above this could be achieved with a relatively narrow strip of landscaping to the south of the site.
Appendix 1

Issues and Options Reqs, October 2017
Dear Sir / Madam,

Representations to Issues and Options for the Suffolk Coastal Local Plan Review Consultation
Land between High Street and Chapel Lane, Wickham Market

On behalf of our client Hopkins Homes Limited we wish to make representations to the current Suffolk Coastal District Council Issues and Options consultation for the Suffolk Coastal Local Plan Review.

The consultation document is split into two parts with Part 1 focussing on the strategic cross-boundary issues facing Ipswich Borough Council (IBC) and Suffolk Coastal District Council (SCDC) and Part 2 focussing on local issues for Suffolk Coastal. The consultation document poses a series of questions on the future growth of the district. On behalf of Hopkins Homes, we wish to make specific representations on the following questions:

- **Part 1:**
  - Q06 – Which growth scenario should we plan for across the Ipswich Housing Market area?
  - Q07 – Do you have evidence to suggest that the housing and/or jobs targets should be different from the forecasts or scenarios outline above - either higher or lower?
  - Q09 – What key pieces of transport infrastructure should be sought?
  - Q13 – Which distribution options do you think would be most appropriate to take forward?
  - Q29 – What infrastructure is currently required in your area and what additional infrastructure do you think would be needed, and where, to support the future distribution and levels of growth outlined?
  - Q32 – Is there a need for additional education provision in certain areas of the Housing Market Area, including early years and special educational facilities, and if so what is the need and where?

- **Part 2:**
  - Q144 – Are there any other sites you are aware of which the Council should consider?

With respect to Q144 we wish to promote a site not previously submitted to the Council on our client’s site between High Street and Chapel Lane, Wickham Market for the development of approximately 100 homes.
along with open space, landscaping and connections to the local highways and footpath network. The development of the site would be focused on the northern portion of the land and would be in keeping with that delivered on Hopkins Homes’ site immediately to the north at Land South of Featherbroom Gardens, High Street, approved in 2013 as part of Application Reference C/12/2123.

Part 1

Q06: Which growth scenario should we plan for across the Ipswich Housing Market area?

We support a combined approach to delivering Scenarios B and C and consider that a 40% uplift against the OAN is required.

The Issues and Options document includes 3 options for setting the housing requirement for IBC and SCDC based on the OAN contained in the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (May 2017):

1. **Scenario A Baseline (OAN only)** – 21,531 dwellings (11,420 in Ipswich and 10,111 in Suffolk Coastal) – 4,776 dwellings would be the residual figure to be planned for once housing completions and permissions between 2014 and 2017 and existing allocations are accounted for.

2. **Scenario B Medium Increase in Growth (OAN plus 20%)** – 25,837 dwellings (no split identified between Ipswich and Mid Suffolk) – 9,082 dwellings would be the residual figure. This option aims to meet the regions aspirations for significant economic growth and recognises that a significant increase in the delivery of new homes is required to avoid constraining the labour supply.

3. **Scenario C High Increase in Growth (OAN plus 40%)** – 30,143 dwellings (no split identified between Ipswich and Mid Suffolk) – 13,388 dwellings would be the residual figure. This option aims to use infrastructure delivery to open up new land for housing and for new housing to support infrastructure delivery. It also recognises the importance of planning for large sites that have the critical mass to deliver health, education and community infrastructure on site.

We commend SCDC and IBC for considering the need for increased levels of growth over and above the OAN to support the region's economy and for recognising the benefits that can be accrued from a positive approach to infrastructure delivery. We consider that Scenarios B and C should be planned for in tandem to support both planned economic development and infrastructure delivery. In this respect, we consider that the figure to be planned for should be at least 40% above the OAN.

There is considerable justification for Scenarios B and C in the New Anglia Local Enterprise Partnership’s (LEP) economic strategies for the region:

- **The New Anglia Strategic Economic Plan** (New Anglia SEP) (2014) provides the blueprint for how the New Anglia Local Enterprise Partnership (LEP), an association of all the local authorities and key businesses in Norfolk and Suffolk, aims to deliver economic growth across the area to 2026. It sets targets for growth in jobs, businesses and housing. In September 2016, an **SEP Impact Report** was published which reviewed the progress made towards New Anglia SEP’s growth targets. It outlined that good progress had been made against the SEP’s targets for new jobs and businesses, but that more work was needed to ensure targets for housing are met. To help address the need for an additional housing, the LEP have recently published an **Economic Strategy for Norfolk and Suffolk** for endorsement by local authorities, businesses and education partners. This document sets a revised housing target for the delivery of 140,000 new homes in Norfolk and Suffolk by 2036 and it is clear that achieving this target will require an uplift in housing delivery across the region. Suffolk Coastal has an important role to play in delivering additional new homes to meet this wider regional target. Scenario B should therefore be supported and the OAN uplifted by 20%.
In addition to the ambitious targets set by the New Anglia LEP for housing growth, the Economic Strategy for Norfolk and Suffolk identifies a huge potential for economic growth in both Ipswich and Suffolk Coastal. In particular, it identifies the strategically important role of Suffolk Coastal as part of the Norfolk and Suffolk Energy coast, a global centre of oil, gas, nuclear and renewable energy generation and infrastructure. It states that the proposed development of Sizewell C nuclear power station will create 25,000 jobs, and opportunities in the decommissioning of existing nuclear power facilities and offshore installations and that significant investment is planned for the A12 to support the future growth of the Nuclear and wider energy sector. It is clear from this that there is a significant need for additional homes to support the forecast growth in jobs in the A12 corridor and that infrastructure improvements to the A12 will also make the area a more sustainable location for large scale growth. Scenario C should therefore be supported and a significant portion of its 40% uplift should be attributed to the A12 corridor to support the growth of the Norfolk and Suffolk Energy Coast and make the most of planned infrastructure improvements to the A12.

Q07: Do you have evidence to suggest that the housing and/or jobs targets should be different from the forecasts or scenarios outline above - either higher or lower?

The methodology used to calculate the emerging OAN is not in accordance with the government’s current consultation on the new standardised housing needs methodology. Using the new methodology, the OAN would increase by 8% and it should be revised up accordingly. The 40% uplift outlined above should then be applied and SCDC’s housing requirement should also factor in IBC’s unmet need. Based on our calculation below, we consider that SCDC should set a housing target of 15,550-16,050. (706-730 dpa).

The district’s emerging OAN is identified in the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA, May 2017) as 10,111 dwellings between 2014-2036 (460 dpa). The methodology used to calculate the OAN is not in accordance with the government’s current consultation on the new standardised housing needs methodology. The government plan to bring the new methodology into force in April 2018, from which point it will apply to all Local Plans not submitted for examination before this point. The Council will not be ready to submit their Local Plan Review before April 2018 and it will therefore be required to use the new methodology to calculate its OAN.

In the context of the above, we consider that the Council should review its OAN as a matter of priority in accordance with the government’s proposed standardised housing needs methodology. This new methodology has significant implications for SCDC’s OAN and the wider Ipswich Housing Market Area (HMA). The table below includes a comparison of the SHMA 2017 figures for each Council in the Ipswich HMA and the revised figures published by the government with the current housing needs methodology consultation. It shows SCDC’s OAN would increase by 8% or 35 dpa and that while Ipswich would see a fall in its OAN using the new methodology, Babergh and Mid-Suffolk would see a significant increase in their housing number. In total, the OAN for the HMA will need to be increased by 3,576 dwellings (163 dpa).

<table>
<thead>
<tr>
<th>Local Planning Authority</th>
<th>OAN (dwellings)</th>
<th>OAN (dpa)</th>
<th>New Method (dwellings)</th>
<th>New Method (dpa)</th>
<th>Change</th>
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<tr>
<td>Ipswich</td>
<td>11,420</td>
<td>519</td>
<td>9,724</td>
<td>442</td>
<td>-77dpa / -15%</td>
</tr>
<tr>
<td>Babergh</td>
<td>7,820</td>
<td>355</td>
<td>9,658</td>
<td>439</td>
<td>+84dpa / +24%</td>
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<tr>
<td>Mid Suffolk</td>
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<td>12,606</td>
<td>573</td>
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</tr>
<tr>
<td>Suffolk Coastal</td>
<td>10,111</td>
<td>460</td>
<td>10,890</td>
<td>495</td>
<td>+35dpa / +8%</td>
</tr>
</tbody>
</table>
In 2016, the 4 Local Planning Authorities in the Ipswich HMA published a Memorandum of Understanding (MoU) relating to planning for housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area. In this MoU, the Council’s commit to the following actions through a joint or aligned local plan review process:

- To agree objectively assessed housing need for the Ipswich Housing Market Area; and
- To identify broad locations to accommodate housing and employment growth, within the context of national planning policy and local planning constraints.

It is clear from the above that the HMA authorities will need to collectively review their OAN figure in light of the government’s new standardised methodology and will also be required to review where the most sustainable and deliverable locations are for growth.

In the context of the above, it should be noted that the consultation document recognises that Ipswich Borough Council will not be able to meet their OAN within the borough boundary and that it is estimated that their shortfall will be somewhere in the region of 2,000-2,5000 homes. This is important as while the above table shows that Ipswich’s OAN will fall by 1,696 dwellings, this would still leave 304-804 new homes unaccounted for within the borough boundary. The consultation document recognises that National Planning Policy requires a HMA wide approach to meeting the OAN and that if land is not available in one part of the HMA to meet it, then options across the whole HMA should be considered. Despite this, however, the consultation document makes no reference to how IBC’s unmet housing need would be reapportioned and instead simply states that “It is not the case that any need not planned for within Ipswich Borough would automatically have to be accommodated within Suffolk Coastal”. This is technically true, but considering the large increases to Mid-Suffolk and Babergh’s OANs, we consider that SCDC is the most sustainable and deliverable location for meeting Ipswich’s unmet need.

Based on the above, we consider that Suffolk Coastal’s OAN should be increased to 10,890 dwellings (495 dpa) using the government’s new standardised housing needs method. This figure should then be uplifted by 40% to support planned economic development and infrastructure delivery (in accordance with our answer to Q06) and Ipswich’s unmet need should be added. This gives a total housing requirement for SCDC of 15,550-16,050 (706-730 dpa).

**Q09: What key pieces of transport infrastructure should be sought?**

We support the delivery of the Suffolk Villages Gateway Scheme – A12 Four Villages Bypass.

The proposals for the A12 Four Villages Bypass will see a new stretch of the A12 constructed to bypass the four villages of Marlesford, Little Glemham, Stratford St Andrew and Farnham. The current four-and-a-half-mile section of single carriage running through these villages links two dual carriageway sections of highways and suffers from problems with congestion, reliability, resilience, accidents, air quality problems and community severance. We consider its development to be critical to the further economic development of the A12 corridor and the Norfolk and Suffolk Energy Coast.

**Q13: Which distribution options do you think would be most appropriate to take forward?**

We consider Option 6 to be the most sustainable and deliverable option for the distribution of additional development to 2036, albeit following an expansion of the definition of the A12 corridor. We do, however, feel that there should be complementary focus on the delivery of appropriate levels of growth in the larger and more accessible villages elsewhere in the District, particularly those along the A14 corridor between Ipswich and Felixstowe. On review, we consider that Option 6 should be refined to ensure that the A12 corridor should
suitably deliver 50% of the District’s growth with at least 15% of all new houses dispersed across the wider rural area.

The consultation document sets out 6 options for the delivery of the required housing requirement. Options 1-3 deal with delivery to meet Ipswich’s needs and Options 4-6 deal with delivery to meet Suffolk Coastal’s needs:

- **Option 4 – Continuation of existing approach** – focusses development on the communities around Ipswich, Felixstowe and the Trimley Villages and the Market Towns;
- **Option 5 – Ipswich and A14 transport corridor** - focusses development to the east of Ipswich and Felixstowe; and
- **Option 6 – A12 transport corridor and dispersed rural focus** – seeks to spread more development across the rural parts of the district but with a focus on those communities well related to the A12 corridor such as Saxmundham, Wickham Market and Yoxford.

When considering the appropriate spatial distribution of growth for the plan it is firstly important to consider the difficulties encountered by both Ipswich and Suffolk Coastal’s current strategies.

Appendix 1 to the consultation document identifies that there are still 2,520 allocated dwellings (114 dpa) to be built on land East of Ipswich during the plan period and 1,943 dwellings (88 dpa) centred around Felixstowe and the Trimleyes. Indeed 3,025 of the 4,463 homes planned across both growth points are yet to be granted any form of planning permission. Completion rates in these areas for the first three years of the plan period show that they are currently delivering roughly the required number of dwellings per annum. However, we would have concerns that the allocation of a significant number of additional homes in these areas would see the potential saturation of the local marketplace, with lessening demand resulting in significant under-delivery.

To this end a step change from urban focussed delivery is required. We consider that Option 6, which seeks to direct a sizeable proportion of the housing requirement toward the more sustainable settlements in the rural area, is the most suitable and deliverable option for the growth of the district to 2036.

We do, however, feel that there is a compelling need for further refinement of the proposed approach included under Option 6.

We agree that the A12 corridor should provide a strong focus for this growth, due to the high level of accessibility that the trunk road offers. However, the spatial approach advocated by Option 6 should also include a strong recognition of the role that the more sustainable settlements within the wider rural area can provide in the delivery of the District’s significant housing requirement.

We consider that the definition of the A12 corridor – the focus for growth – should be extended to include Leiston and Woodbridge. Leiston is the nearest town to the development of Sizewell C nuclear power station and therefore a key location for growth in the area. Woodbridge is a key settlement and service centre to the south of the A12 corridor and will benefit from planned improvements to the A12 in a similar way to other settlements such as Saxmundham and Wickham Market.

The proposed A12 Four Villages Bypass will deliver significant improvements to the accessibility and sustainability of settlements along the A12. It will therefore essentially ‘open up’ the A12 corridor to further sustainable growth which is the approach supported in the Council’s growth Scenario C. Encouraging development along the A12 corridor will help deliver the economic benefits of Sizewell C nuclear power station and the wider Energy Coast and therefore help fulfil the objectives of growth Scenario B.

Appendix 1 of the consultation document states that the villages of the A12 corridor have delivered 401 homes between 2014 and 2017 with 337 additional commitments. This both demonstrates that the corridor is an area
of the District with a track record of regular completions but also one that is not currently overburdened by an overwhelming level of existing commitments. We consider that it represents a considerable opportunity to plan for a significant level of the required additional growth in the District.

In terms of the wider rural area we consider that ample opportunities exist to distribute additional growth across a variety of sustainable sites in the District’s larger and more accessible settlements. By way of an example, the A14 villages form a clutch of such sustainable and accessible settlements that are able to deliver notable growth – this is evidenced from the ongoing growth in the Trimleys, on the edge of Felixstowe. Whilst we would not necessarily advocate additional substantial growth in the Trimleys (villages which have delivered 52 homes since 2014 with a further 692 further commitments) we do recognise the potential for additional housing to be delivered in villages such as Kirton in particular.

It is important to recognise that the need for appropriate levels of growth to help bolster infrastructure is not the preserve of the more strategic locations of the District. There is a pressing need for appropriate and sensitive growth across the wider rural area to ensure that communities remain vital and viable. Indeed, the Planning Practice Guidance suite in its coverage of the issue of Rural Housing recognises that “all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”. It is important that the delivery of rural housing across the plan area isn’t essentially locked in to two or three key growth locations defined by existing transport infrastructure.

A case in point is our Client’s site in Kirton (identified as Site 552 in the Issues and Options Consultation Document and dealt with as a counterpart representation) which demonstrates how the delivery of a modest level of growth can both support and be supported by the existing facilities within a key rural settlement. The appropriate apportionment of housing to settlements across the rural area is critical to ensure they remain vital and viable.

In its current form, Option 6 still proposes to allocate 50% of total additional growth to land East of Ipswich and in Felixstowe. For the reasons set out above we consider a further substantial allocation of housing to be undeliverable in these areas. We therefore recommend that the Council increases the level of growth to be attributed to both the extended A12 corridor and the ‘Other villages and rural settlements’.

We consider that the figure for the wider A12 growth corridor should be increased to 50% of new allocations with the level of growth to be directed towards the wider rural area increased to roughly 15%. At Q07 above we outline that SCDC’s housing requirement should be 15,550-16,050 dwellings (706-730 dpa), of which 8,466 are already committed. This leaves 7,584 dwellings still to be allocated, of which we recommend 50% or 3,792 dwellings should be allocated to the A12 corridor, including Leiston and Woodbridge with a further 1,137 allocated across the wider rural area. Each of these figures would of course represent a minimum requirement.

Q29: What infrastructure is currently required in your area and what additional infrastructure do you think would be needed, and where, to support the future distribution and levels of growth outlined?

We support the delivery of the Suffolk Villages Gateway Scheme – A12 Four Villages Bypass.

As outlined above, we consider this key piece of infrastructure to be critical to achieving the economic ambitions of the district and wider Norfolk and Suffolk Energy Coast and that it will help sustainably deliver much needed new homes along the A12 corridor to support this growth.

Q32: Is there a need for additional education provision in certain areas of the Housing Market Area, including early years and special educational facilities, and if so what is the need and where?
It is important that development comes forward in areas where there is either sufficient education, health and community infrastructure or where this infrastructure can be delivered by developments.

In identifying potential sites and locations for development, we recommend that the Council takes a positive approach to ensuring sufficient education, health and community infrastructure is in place to meet increased needs. This approach should focus on locating development where there is either existing capacity to meet needs, or where it is demonstrated that additional infrastructure requirements can be provided as part of developments. This approach has clear implications on both the location of development, but also on ensuring that allocated developments are of a sufficient size to be able to provide additional facilities and services required.

A key example in this regard is the need for a new primary school in Saxmundham which Suffolk County Council (SCC) as Local Education Authority raised as a key issue during the Examination of the recently adopted Site Allocations and Area Specific Policies Document. This lack of capacity was held to be a significant constraint to any further growth in the town. The consultation document outlines that a significant level of growth will be required in Saxmundham and it is therefore clear that there is a requirement for a new primary school.

**Part 2:**

**Q144: Are there any other sites you are aware of which the Council should consider?**

We consider our client’s site between High Street and Chapel Lane, Wickham Market to be a uniquely sustainable option for a low-density development of approximately 100 homes along with open space, landscaping and infrastructure. Any proposal would draw strong cues from Hopkins Homes site at Land South of Featherbroom Gardens, High Street, Wickham Market that was approved in 2013 (Ref: C/12/2123) (now known as Morris Road) which lies immediately to its north. We set out below the clear need for significant housing growth in Wickham Market of several hundred new homes and outline the sustainability of the proposed development site.

**Wickham Market Housing Requirement**

As outlined above, we consider the wider A12 corridor to be the most sustainable and deliverable option for large scale housing growth in the district to 2036. Wickham Market is one of the largest settlements in the A12 corridor and is identified in the adopted Local Plan as a Key Service Centre. It is therefore considered to be one of the most sustainable locations for growth in the A12 corridor and has an important part to play in delivering residential development to support the District’s economy and the delivery of essential local infrastructure. As a Key Service Centre Wickham Market is reliant on housing growth to both sustain existing services and facilities but also encourage the growth and diversification in the range of services the centre offers.

The adopted Site Allocations and Area Specific Policies Development Plan Document (January 2017) failed to allocate any sites for residential use despite the undoubted sustainability of the settlement. This is despite the Core Strategy (July 2013) clearly identifying Wickham Market as one of the few settlements of the District that could capably accommodate growth of scale. Paragraph 4.87 of the Core Strategy in fact makes a clear case for future allocations in the town when pre-empting the approach to be taken by the Allocations document:

"...the scale of each allocation will be consistent with the size and nature of the settlement. In larger Key Service Centres, these could be as much as 30 homes, down to 10 homes in the smaller ones. an exception may be Rendlesham where there is an outstanding allocation of about 75 homes. Wickham Market is another larger settlement where larger scale development may be possible."

(our emphasis)
It is important that the failure to seize on the growth opportunities offered by Wickham Market is not replicated in the emerging plan, particularly considering the significant development need in the District.

Currently the consultation document does not include any specific housing target for Wickham Market and in the indicative housing numbers at Appendix 1 it is it is simply included as either one of the Key and Local Service Centres (Option 4), Other towns, villages and rural settlements (Option 5) or A12 settlements (Option 6). Within these options, however, Wickham Market would be considered one of the largest settlements in each of the categories and would therefore be required to accommodate a significant level of the general growth figure. It is unquestionable that Wickham Market should be considered as a sustainable location for growth and that it will be required to accommodate additional major development whichever distribution option is chosen.

As outlined above, we consider a variation of Option 6 that sees a higher level of development allocated to the A12 corridor and the wider rural area to be the most sustainable option available for the Council to meet its additional housing needs. Within this option we consider that it is essential that the Council clearly apportions a development target for Wickham Market and other larger settlements along the A12 to provide a framework for the allocation of sufficient sites to meet the needs of individual settlements as well as the growth target for the A12 corridor and District as a whole.

Building on our analysis attributed to Q06 and Q07, in which we identify a housing requirement of 3,792 dwellings to be delivered in the A12 corridor, and our acknowledgement of the various sustainable sites in the town identified during the Call for Sites process (including our Client’s land at Old School Farm, to the north west of the High Street / Chapel Lane site), we consider that Wickham Market is prime to sustainably accommodate several hundred new homes.

Land between High Street and Chapel Lane, Wickham Market

Our Client, Hopkins Homes, have an interest in a parcel of land located between High Street and Chapel Lane, to the south of Wickham Market. The site represents an immediately available, suitable and entirely unconstrained option to deliver a sustainable residential development of around 100 homes on the edge of the urban area. It would form a logical and self-contained addition to the settlement and would draw strong cues from Hopkins Homes own recent development immediately to the north of the site (Application Reference C12/2123).

The site comprises a flat cultivated agricultural field which is unburdened by any designations or known physical or policy constraints. There are no adjacent heritage assets or protected habitats. Whilst the site lies adjacent to a Special Landscape Area to the east of Chapel Lane it is anticipated that any development on the site would largely be concealed from wider views by a series of established field lines and hedgerows. In addition, our Client would seek the delivery of a form of low-lying development in keeping with the Morris Road scheme to the north, largely comprising single storey bungalows.

The site lies immediately adjacent to the built-up area of Wickham Market, to the north. Its extent is clearly demarcated by High Street on its western boundary and Chapel Lane to its east. Whilst the field containing the site extends beyond the southern boundary of the area subject of this representation it is anticipated that the eventual southern extent of any development would be clearly established by a new belt of strategically designed landscaping and the establishment of a new field line.

Despite the site extending to 6.0 hectares in total it is anticipated that the developable area would comprise only the extent of the land closest to the built-up area of Wickham Market. A belt of land along the southern boundary of the site could then comprise a mixture of sensitively designed landscaping and informal amenity space allowing a gentle transition from the urban to rural form.

Immediate access to the site would be drawn from High Street to the west. A green lane runs close to the south-east corner of the land, linking it to an extensive network of rural footpaths and bridleways. There is also a bus
stop immediately to the north west of the site, on High Street, that provides access to regular services to Ipswich, Martlesham, Saxmundham and beyond.

Critically, when assessing the site against the other strategic growth options in the town comprising Sites 1055, 816 and 878, the land along with our Client’s additional site at Old School Farm (Site 499) present the only options unburdened by deficient highways access. Wickham Market is a settlement largely characterised by networks of single carriageway country lanes leading into and away from the centre as is the case on its eastern and western extremities, the locations of the only two alternative growth options. The south of Wickham Market, however, is fortunate to be served by the B1438 High Street which provides ample highways capacity leading into the centre to the north and to the A12 around 1.5km to the south.

In terms of accessibility to services, the site is close to both Wickham Market’s playing fields and the new Cooperative supermarket on the High Street. The wider range of services available in the centre then lie around 750m to the north, accessible via a continuous footway that leads along the High Street.

In considering the deliverability of the site we can confirm that it is in single ownership and is subject of an Option held by our client, Hopkins Homes, who are the largest independent house builder in the District. Hopkins Homes are extremely active across the region and have successfully delivered numerous high quality developments in the area, including the development to the north of the site. Our Client is committed to delivering the same level of high quality development on the site and would intend to move the proposal forward at pace within the first five years of the plan period.

Hopkins Homes’ site at High Street / Chapel Lane is one of the most sustainable and deliverable options for development in Wickham Market. There is a clear identified need for significant levels of growth in sustainable settlements such as Wickham Market and we therefore recommend that the site is allocated for residential development of approximately 100 dwellings in the Local Plan Review.

**Conclusion**

On behalf of our client, Hopkins Homes, we support a combined approach to delivering growth Scenarios B and C to support economic growth and ensure the benefits of planned infrastructure improvements are realised. On this basis, we consider that at least a 40% uplift against the OAN is required, but before this uplift is applied the OAN needs reviewing as a matter of priority to bring it in line with the government’s new standardised housing needs methodology. The consultation document also fails to account for Ipswich’s unmet need. For the reasons set out within this letter we consider Suffolk Coastal to be the most sustainable and deliverable option to accommodate this growth. Based on our calculations we consider that SCDC should set a housing target of 15,550-16,050 (706-730 dpa).

In order to deliver this housing requirement, it is clear that significant levels of growth will need to be allocated to both the A12 corridor and across the rural area. We recommend that the Council builds on the work it has already undertaken in this regard to strengthen its ambitions for growth in this area.

In terms of development within Wickham Market, this letter promotes the allocation of Land between High Street and Chapel Lane, Wickham Market for the development of approximately 100 homes. We have sought to demonstrate that Wickham Market is one of the most sustainable locations for growth along the A12 corridor and as such should be allocated several hundred new homes. The site itself is considered to be one of the most sustainable options to deliver required housing growth in Wickham Market with its the southern end representing the appropriate direction for an expansion. Accordingly, our Client’s site should be allocated for residential development.

We trust that these comments will be given due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact me.
Yours sincerely

Geoff Armstrong  
Director  
Armstrong Rigg Planning
**Suffolk Coastal Local Plan Review**

**Consultation on the First Draft Local Plan**

20\textsuperscript{th} July until 14\textsuperscript{th} September 2018 (5:00PM)

(Consultation carried out under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012)

Please specify to whether your comments relate to the Local Plan, the Sustainability Appraisal (SA) or the Habitats Regulations Assessment (HRA)

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<th>Habitats Regulations Assessment</th>
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Please specify to which policy or part of the plan/document your comments refer.

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Please state whether you support, object or are commenting

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Please refer to accompanying representations
Please tick here if you would like to be added to our mailing list to receive updates on the Local Plan.

Please register at [http://consult.suffolkcoastal.gov.uk/consult.ti](http://consult.suffolkcoastal.gov.uk/consult.ti) to submit your comments. Alternatively, comments forms can be sent to Suffolk Coastal District Council, Planning Policy and Delivery Team, East Suffolk House, Station Road, Melton, IP12 1RT, or emailed on this form to suffolkcoastallocalplan@eastsuffolk.gov.uk.

The information you have supplied is being collected in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 (and any updates), and will be used for considering your comments in the preparation of the Local Plan.

Your name only, organisation (if applicable) and comments will be made publicly available on our website and in published documents and so cannot be treated as confidential. Your information will not be used for any other purpose and will not be shared with any other third parties, unless permitted by law.

Your information will be retained until end of the plan period + 1 year or until superseded + 1 year (local retention policy).

Data will be processed and held securely and in accordance with the Data Protection Act 2018 and General Data Protection Regulation (and any updates).

Further information about data protection and the Privacy Notice can be found on the [East Suffolk Website](http://www.eastsuffolk.gov.uk).
14th September 2018

Sent by email to suffolkcoastallocalplan@eastsuffolk.gov.uk

Planning Policy & Delivery Team
East Suffolk House
Station Road
Melton
Woodbridge
IP12 1RT

Dear Sir/Madam

Representations to Suffolk Coastal Local Plan First Draft
Policy SCLP12.56 Land between High Street and Chapel Lane, Wickham Market (Pettistree)

On behalf of our client Hopkins Homes Limited we wish to make representations to the current Suffolk Coastal Local Plan First Draft consultation following on from our previous submissions made to the Issues and Options Local Plan consultation in October 2017. Detailed representations have been made in our accompanying letter reference GA/EW/05017/L0008 in respect of the Local Plan housing number and a range of general policies. This submission relates specifically to Land between High Street and Chapel Lane, Wickham Market (Pettistree) proposed to be allocated for residential development under Policy SCLP12.56.

As the Local Plan is expected to be submitted for Examination after 24th January 2019, it will be required to be fully compliant with the revised National Planning Policy Framework (NPPF) in accordance with paragraph 214. Reference is made to the revised NPPF throughout the representations made where relevant and regard has been given to the tests of soundness for examining Local Plans as set out in paragraph 35.

The site allocation proposed for 120 dwellings under Policy SCLP12.56 is situated to the south of Wickham Market directly adjoining an existing Hopkins Homes development approved under reference C12/2123 and would form a logical and self-contained addition to the settlement. The site comprises a cultivated agricultural field which is unburdened by any designations or known physical or policy constraints. There are no adjacent heritage assets or protected habitats. Whilst the site lies adjacent to a Special Landscape Area to the east of Chapel Lane it is anticipated that any development on the site would largely be concealed from wider views by a series of established field lines and hedgerows. Although the field containing the site extends beyond the southern boundary of the area subject of this representation it is anticipated that the eventual southern extent of any development would be clearly established by a new belt of strategically designed landscaping and the establishment of a new field line.
An Initial Landscape and Visual Appraisal has been prepared by Aspect (attached as Appendix 1) which concludes that the site is not considered a ‘valued’ landscape in relation to the revised NPPF and is of reduced landscape sensitivity, owing to its association with the adjacent built form and further urban elements established within the immediate and localised settings. Further, it concludes that if development on the site adopts a sensitive, landscape led approach it can be integrated without significant harm to the receiving landscape receptor or visual environment.

In terms of highways, the site has a direct frontage onto the High Street and a suitable access and extension to the existing footway on High Street can be accommodated to provide access by all modes into the site. A simple priority T junction can serve the site. The required visibility splays can be achieved in either direction, however it is suggested that the site access provides the opportunity to extend the 30mph speed limit south on High Street, subject to the necessary Traffic Regulation Order (TRO).

Preliminary access proposals have been prepared and provided (below) which demonstrates that both the site at Land west of Old School Farm, Wickham Market and Hopkins Homes’ additional site at land between High Street and Chapel Lane, Wickham Market (see separate representation letter reference GA/EW/05017/L0011) can come forward together with appropriate and safe access points without harm to the highway network.

The site is considered to be well located in relation to the existing services and facilities on offer in Wickham Market. The table below provides a summary of walking and cycling distances and journey times to key services/facilities based on a walk time of approximately 80m per minute and a cycle time of approximately 270m per minute.

<table>
<thead>
<tr>
<th>Facility/Service</th>
<th>Distance (Metres)</th>
<th>Journey Time (mins) Walking</th>
<th>Journey Time (mins) Cycling</th>
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<tr>
<td>Wickham Market Primary School</td>
<td>650</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Village Hall</td>
<td>600</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Wickham Market Library</td>
<td>600</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Supermarket (Co-op)</td>
<td>450</td>
<td>6</td>
<td>2</td>
</tr>
<tr>
<td>Wickham Market Medical Centre</td>
<td>600</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Wickham Market Pharmacy</td>
<td>700</td>
<td>9</td>
<td>2</td>
</tr>
<tr>
<td>Riverside Industrial Estate</td>
<td>1,350</td>
<td>17</td>
<td>4</td>
</tr>
<tr>
<td>Cemetery Bus Stop (High Street, B1438)</td>
<td>50</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Post Office</td>
<td>600</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Wickham Market Football Club</td>
<td>600</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Market square</td>
<td>900</td>
<td>11</td>
<td>3</td>
</tr>
<tr>
<td>Wickham Market Railway Station</td>
<td>4,250</td>
<td>-</td>
<td>16</td>
</tr>
</tbody>
</table>

There is an existing bus stop adjacent to the site frontage which is served by several bus routes which on average provide an hourly service Monday to Friday. All routes pass directly adjacent to the site. The site is located in the Super Output Area (SOA) Suffolk Coastal 05. The 2011 Census data for Journeys to Work for this SOA has been reviewed. The 2011 Census Data recorded 15% of the residents in the Suffolk Coastal 005 also work within the area. 46% of these residents travel by sustainable modes (walking, cycling or public transport). Further residential development can build on this existing sustainable mode share.

It is considered there is suitable capacity on the local highways network to support future development. Due to the location of the site, the majority of vehicular traffic associated with a future residential
development will travel south to the A12 and employment destinations in Woodbridge, Martlesham and Ipswich. This will limit the impact of vehicular traffic on the centre of Wickham Market. The local highway network would be assessed as part of any future planning application for the site.
In considering the deliverability of the site we can confirm that it is in single ownership and is subject of an option held by Hopkins Homes who is committed to delivering a high quality development on the site and intend to move the proposal forward at pace within the first five years of the plan period.

The proposed policy identifies that the site is allocated for development of approximately 120 dwellings which will be expected to accord with a range of criteria relating to housing mix, pedestrian connections, landscaping and open space provision. Hopkins Homes wish to support overall the proposed allocation on the basis that it forms a deliverable site in the context of the NPPF, the delivery of which will contribute towards the achievement of sustainable development through the provision of significant economic, social or environmental gains for the area.

However, given our concerns set out in the accompanying supporting representations reference GA/EW/05017/L0008 in respect of the clear and defined significant housing shortfall in the draft Local Plan and in the interest of bolstering the housing supply of the District (including affordable housing) as well as making efficient use of land in accordance with the NPPF, the Plan should be positively prepared to seek to maximise suitable and sustainable sites for housing development such as this. Table 3.5 of the Plan sets out an indicative housing contribution which for Wickham Market is 2%, identifying the need for to 220 additional dwellings which we support as an absolute minimum. Applying this percentage figure to our calculation of what we believe is the actual assessed housing need in the District over the Plan period (up to 14,860 dwellings) however, the proportionate requirement in Wickham Market should accordingly be increased to around 297 dwellings.

Change sought: Policy SCLP12.56 should be amended to refer to the site being allocated for the development of ‘at least’ 120 dwellings

Hopkins Homes generally support the criteria for Policy SCLP12.56, save for the specific requirement to provide ‘at least 15 self-build plots.’ In the first instance, this 13% requirement directly conflicts with draft Policy SCLP5.9 which seeks to impose a specific requirement for a minimum of 5% self or custom build properties on developments of 100 or more dwellings. Regardless, our accompanying supporting representations (reference GA/EW/05017/L0008) raised significant concerns overall to the proposed selfbuild policy on the basis that the express requirement for self-build plots on larger housing sites pays no consideration to actual assessed need or demand for such provision in specific locations. Furthermore, it is unlikely that those interested in self-build projects would wish to build a unit on part of a new housing development. Concern has also been raised that if self-build plots are not developed, there will be an unnecessary delay in housing delivery and build programmes would inevitably be disrupted if it was not known whether or not a small number of plots would eventually be available to the developer if no interest is forthcoming in such plots. Our supporting representations also confirm that these are concerns shared by the Home Builders Federation (HBF) and a number of Local Plan Inspectors examining similar policies. The requirement for at least 15 self-build plots in Policy SCLP12.56 would result in an unnecessary burden which would constrain the delivery of housing. The requirement is not based upon any evidence of objectively assessed development requirements in the area and is therefore not positively prepared or justified.

Change sought: Policy SCLP12.56 should amended to remove reference to the specific requirement for ‘at least 15 self-build plots’ and should refer instead to self-build plots being ‘encouraged’ on the site having regard to the evidence of need in the area, informed by the Council’s Self Build and Custom Housebuilding Register, at the time of a planning application.

It is also noted that criteria (c) and (f) in the policy duplicate the requirement for the provision of open space.
Change sought: The duplicated requirement for open space provision should be corrected accordingly.

We trust that these comments will be given due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact me.

Yours faithfully

Geoff Armstrong
Director
Armstrong Rigg Planning

Proposed allocation – Policy SCLP12.56 Land between High Street and Chapel Lane, Wickham Market (Pettistree)
APPENDIX 1
Initial Landscape and Visual Appraisal
LAND BETWEEN HIGH STREET AND CHAPEL LANE, PETTISTREE

Initial Landscape and Visual Appraisal
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PLAN ASP2 SITE AND SETTING
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APPENDIX 2 KEY VIEW PLAN (EXCERPT FROM EMERGING WICKHAM MARKET NEIGHBOURHOOD PLAN – KEY VIEW ASSESSMENT (APRIL 2018, ISSUE IV).
1. INTRODUCTION

1.1. Aspect Landscape Planning is instructed by Hopkins Homes Ltd. to undertake a review of the landscape and visual matters relating to the land between High Street and Chapel Lane, Pettistree for the potential provision of residential development. The site is illustrated on Plan ASP1 ‘Site Location Plan’ and ASP2 ‘Site and Setting Plan’.

1.2. The purpose of this appraisal is to accompany the other representation material and provides a review of the existing landscape character and visibility of the site and its ability to accommodate residential development. This appraisal covers landscape and visual matters and should be read alongside the other supporting material that accompanies this representation.

1.3. This appraisal will take the following format:

- Review of baseline conditions;
- Identification of potential landscape and visual effects, with suggested approach to mitigation; and
- Conclusions will be drawn

1.4. This appraisal does not represent a detailed Landscape and Visual Impact Assessment (LVIA) but has been prepared in line with guidance set out within GLVIA3, the industry best practice guidance. A detailed LVIA would however, be prepared as part of any future planning application for development on this site.
2. **BASELINE ASSESSMENT**

2.1. The site, whilst within the northern limits of the parish of Pettistree, is located to the immediate south of the settlement of Wickham Market, directly adjacent to a recently constructed residential development comprising 65 dwellings (Ref:C/12/2123). The existing settlement edge of Wickham Market shares a strong degree of intervisibility with the site and forms a notable and prominent urban setting within the receiving landscape. As a result, the site is considered to be highly influenced by the existing settlement edge and urban fringe character.

2.2. The site itself comprises the northern section of an agricultural field, which is defined to the east and west by existing road corridors. The eastern site boundary is defined by Chapel Lane, which is lined by a mature mixed native hedgerow, affording a degree of containment from the east. The western site boundary is defined by the busy B1438 road corridor, which is lined by sporadic tree and scrub planting. The eastern site boundary is defined by a more cohesive vegetation structure established along the more rural Chapel Lane road corridor, by a mature mixed species native hedgerow and hedgerow trees, providing a degree of physical and visual containment from this aspect. There is no physical southern site boundary, with the site being perceived as part of the wider field setting. (Refer ASP1 Site Location Plan & ASP2 Site and Setting Plan).

2.3. The site is located on a gradual north east facing slope, within a wider gently undulating setting, with the site itself falling from approximately 30m AOD in the south west to approximately 22m AOD in the north east. The landform within the site’s localised setting gently falls to the north and east, with the topography to the south west plateauing at approximately 30m AOD which extends to include the settlement of Pettistree.

2.4. The site is not publicly accessible. The nearest rights of way are established by a section of footpath, identified as Footpath 6 within definitive map for Wickham Market, which access the agricultural setting to the east and south of the site, where it crosses the B1438 providing access to the north eastern edge of Pettistree.
Landscape Related Policy

2.5. The site is not located within any statutory landscape designation associated with quality, however it is noted that that its eastern boundary lies immediately adjacent to a Special Landscape Area (refer to plan ASP1 – Site Location). This is a county wide designation (not recognised by the NPPF), covered by the Saved Policy ASP13, within the Suffolk Coastal Local Plan and by emerging policy SSP38, which states:

“……Development will not be permitted in these areas where it would have a material adverse impact on the qualities of the landscape that make it special. Where development is considered acceptable, landscape improvements should be included as an integral part of the development proposal.”

2.6. The site is covered by the Suffolk Coastal District Local Plan, Core Strategy & Development Management Policies (Development Plan Document, July 2013) and the Suffolk Coastal Local Plans remaining ‘Saved Policies’ (July 2018). Emerging policy and supporting evidence base can be found within the emerging Suffolk Coastal Local Plan, First Draft Local Plan (July 2018). Initial consultation on the emerging plan was open to the public between 20th July to 14th September 2018.

2.7. The site falls within Pettistree Parish Council, which as yet, has no adopted Neighbourhood Plan. However, the site is physically connected to Wickham Market (identified as a large village within the settlement hierarchy) which is currently in the process of adopting a Neighbourhood Plan, which will cover the period 2011-2036. Whilst the Wickham Neighbourhood Plan is emerging and therefore of limited planning weight, it is considered to offer a good indication as to the wishes and aspirations of the village community in relation to development and as such has been considered within this landscape and visual appraisal.

2.8. Supporting documents of note, considered of landscape relevance include the ‘Wickham Market Landscape Assessment,’ which includes the Key Views Assessment (April 2018 Issue IV) and the Landscape Character Assessment (April 2018 Issue IV). Several Key Views, which relate to the site, are identified within Key Views Assessment and are assessed within Section 3 of this document. The site although not located within any of the defined Parish Character Areas, is within
close proximity to WM3 – Mill Lane Valleyside and WM5 – Thong Hall Plateau Edge character areas.

2.9. The site has been identified within the emerging plan for Proposed Housing Allocation (Policy SCLP12.56) and measures 6.16Ha for potentially up to 120 homes, which states:

“Development will be expected to accord with the following criteria:

a) Development of a mix of dwelling types including housing to meet the needs of older people and provision of at least 15 self build plots;
b) Provision of affordable housing;
c) Provision of open space to act as a focal point of the development;
d) Provision of landscaping and creation of a ‘soft’ edge to the southern boundary of the development;
e) Provision of pedestrian connectivity with footpaths to the north on the B1438;
f) Provision of open space to form a focal point for the development; and
g) A flood risk assessment will be required, and any necessary mitigation provided.”

Landscape Character

2.10. At a regional level, the Natural England Character Map of England illustrates that the site is located on the boundary between the South Norfolk and High Suffolk Claylands NCA (83) and the Suffolk Coast and Heaths NCA (82). The regional assessments identifies that these areas are characterised by a number of features, including:

South Norfolk and High Suffolk Claylands NCA (83)

- “Large plateau area of chalky glacial till that is generally flat or only gently undulating, but can be locally concave. The edges of the plateau have been dissected by watercourses that form greater slopes, especially along the tributaries of the Waveney.”
Views are frequently open, only sometimes confined by hedges and trees, with some woodland present. The small valleys support quite confined landscapes with intimate views

Scattered areas of ancient woodland, game copses, shelterbelts, valley floor plantation and carr woodland as well as hedgerow trees provide a treed landscape character, despite much boundary loss

A mix of remnant medieval ancient countryside, some of it with a decidedly coaxial character, although irregular field patterns and large modern amalgamated open fields dominate.

Extensive areas of arable land dominated by cereals with break cropping of sugar beet and oilseed rape, and some pastures along valley floors. Intensive pig and poultry production is common.

A dispersed settlement pattern of small nucleated market towns with architectural variety and colour, loosely clustered villages and scattered hamlets. Settlement is often focused around large medieval greens. Many of the market towns have modern extensions

Some major transport links including the Norwich to London main rail line but infrastructure routes are predominantly an extensive network of narrow lanes and byroads.

Suffolk Coast and Heaths NCA (82)

Farm woodlands, plantations and field boundary trees provide a treed character with substantial coniferous forests (Rendlesham, Tunstall and Dunwich) in the core of the NCA. Ancient broadleaved woodland and parkland wood pasture cloak the southern river valley and estuary slopes. The coastal levels are largely devoid of trees

Inland valleys contain small-scale historic patterns of irregular drained meadow enclosure, bounded by elm hedgerows. The Sandlings and the coastal plain show 18th- to mid-19th-century large-scale regular enclosure. Pine lines and shelterbelts are characteristic of the Sandlings.

Settlement is sparse, with small, isolated villages and farmsteads. Larger urban settlements are confined to the north and south (Lowestoft, Ipswich and Harwich). Distinctive coastal towns (Aldeburgh, Southwold and Felixstowe) enjoy a relatively unspoilt atmosphere

Traditional buildings utilise soft-hued red bricks with straw thatch, pantiles or peg tiles. Some are rendered and painted (often in ‘Suffolk
Pink’) while others (including churches) use locally occurring split or knapped flint. Brightly painted beach huts line the coastal resort seafronts

- Large commercial ports (Harwich and Felixstowe), Sizewell nuclear power station, the Cobra Mist transmitting station and the Orwell Bridge all contribute landmark diversity. Major transport infrastructure includes the A14 and A12 and the main East Coast rail line.

- Public access is extensive both on the land and on the rivers. The sense of tranquillity and wildness is integral to the distinctiveness of the NCA, inspiring many writers, artists and naturalists, and supports the area’s popularity as a recreation and tourist destination.

2.11. At a more local level, ‘The Suffolk Landscape Character Assessment’ has identified the site and its wider setting within Landscape Character Area 4: Ancient Rolling Farmlands. The key characteristics of the LCA4 are identified as being:

- Rolling arable landscape of chalky clays and loams.
- Dissected widely, and sometimes deeply, by river valleys.
- Field pattern of ancient random enclosure. Regular fields associated with areas of heathland enclosure.
- Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees.
- Substantial open areas created for airfields and by post WWII agricultural improvement.
- Scattered with ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly.
- Network of winding lanes and paths, often associated with hedges, create visual intimacy.
- Dispersed settlement pattern of loosely clustered villages, hamlets and isolated farmsteads of medieval origin.
- Farmstead buildings are predominantly timber-framed, the houses colour-washed and the barns blackened with tar. Roofs are frequently tiled, though thatched houses can be locally significant.
- Villages often associated with village greens or the remains of greens.

2.12. The Ancient Rolling Farmlands ‘Guidance Note’, which accompanies the above character assessment, identifies several Development Management issues,
including: ‘Settlement expansion eroding the characteristic form and vernacular styles’ stating:

“Parishes in this landscape tend to consist of multiple clusters of varying sizes. The release of land for development should, if at all possible, reflect the local pattern. Ribbon development destroys this pattern and can have a considerable impact on the wider landscape. When vernacular styles and detailing are used for housing or other development the choice should echo that of the immediate locality or the specific cluster in which the development is proposed.”

2.13. With regards to **Land Management Guidelines**, the Guidance Note identifies the following management principles:

- Reinforce the historic pattern of sinuous field boundaries
- Recognise localised areas of late enclosure hedges when restoring and planting hedgerows
- Maintain and restore greens commons and tyes
- Maintain and increase the stock of hedgerow trees
- Maintain the extent, and improve the condition, of woodland cover with effective management
- Maintain and restore the stock of moats and ponds in this landscape

2.14. The potential effects through the introduction of residential development, within the site on the Ancient Rolling Farmlands character area, will be assessed within Section 3 of this report.

**Visual Environment**

2.15. Publicly accessible views of the site have been tested with views taken from the Public Right of Way (PROW) network that runs within the localised setting to the east and south of the site (Footpaths 5 & 6 as identified within the Wickham Market Definitive Map) the localised and wider road network and the neighbouring settlement locations found to the immediate north within the southern extents of Wickham Market and the eastern extents of Pettistree, found within the localised setting to the west. The visual assessment records the relevant Key Viewpoints as identified within the Key Views Assessment, which forms part of the evidence base.
for the emerging Wickham Market Neighbourhood Plan. Viewpoint locations can be found within the attached Viewpoint Location Plan, within Appendix 1 of this report, whilst the potential visual impacts are assessed within Section 3 of this report.
3. **POTENTIAL LANDSCAPE AND VISUAL EFFECTS**

3.1. The Landscape and Visual Appraisal does not include a detailed assessment of effects, but seeks to assess the principle of introducing residential development into the site within the context of the receiving landscape and visual environment as identified within the baseline assessment.

3.2. This section will provide an overview of the possible effects in terms of landscape character and visibility if the site were to be developed in an unsympathetic, non-landscape led way. The assessment then includes a series of recommendations for development to avoid or mitigate for the potential identified harm.

**Potential Landscape Effects**

3.3. The development of this site could give rise to potential significant landscape effects including:

- Over development of the site
- Reduction in perceived openness
- Loss of key landscape features
- Increased intervisibility of built form
- Loss of habitats
- Reduction in perceived tranquillity

3.4. To avoid these potential adverse effects, it is recommended that the proposals adopt a sensitive, landscape-led approach to the design of the layout and appearance of the scheme. The Site is located, adjacent to the defined settlement boundary to the south of Wickham Market and there is an opportunity to create a high quality residential development that creates a more sympathetic transition between the established settlement edge and the more rural landscape to the south than currently exists.

3.5. New development should avoid the creation of hard and prominent settlement edges by the incorporation of landscaped buffers and open spaces to the external boundaries and along the road corridors that run adjacent to the Site. This will ensure that a sense of space for users of these routes is maintained, and a softened edge to the development is established. In particular the site’s western edge,
immediately adjacent to the B1438, has been identified as having a weak vegetation structure and would benefit from the addition of new landscaping to re-establish the existing field boundary. The incorporation of landscape buffers to the external boundaries of the Site will also reflect the guidance set out within the Ancient Rolling Farmlands Guidance Notes and the emerging planning policy (SCLP 12.56) which suggests that new development be integrated into the landscape through the provision of open space creating focal points within the development area and boundary planting creating high quality landscape buffers. This is considered of particular importance along the site’s exposed southern boundary.

3.6. The Site masterplan should be developed to ensure that a sympathetic transition between the urban setting and wider rural landscape setting is achieved. This will ensure that southern village approach from the B1438 is enhanced and that the localised setting to the north east of Pettistree is not harmed and the perception of coalescence is avoided.

3.7. Any development within the Site should seek to protect and maintain the existing treescape and established field boundaries. These form key landscape features, where their retention will assist in creating a high quality, mature landscape setting for the proposals from Day One. It is noted that the site’s eastern boundary is established by a mature vegetation structure, providing a sense of enclosure between the site and the SLA established to the immediate east and would also benefit from this approach.

3.8. The incorporation of high quality landscaping within the internal development area itself, will ensure that the scale and massing of the potential residential development is consistent with the surrounding residential village setting. Through the introduction of feature trees, ornamental shrub planting, clipped hedgerows and maintained lawns, a series of diverse and verdant streetscenes could be established, reflecting the positive landscape elements evident within the village at present.

3.9. A landscape led design approach is considered vital to meet the requirements of the guidance notes and emerging policy, whilst ensuring that a sense of continuity is established between the neighbouring development parcel and the site itself. The incorporation of significant open space, supplemented by further high quality landscaping, would ensure that a sensitive, shared breathing space between the two developments is established within this important transitional area and would further ensure that an important visual break is established reducing the sense of urban
sprawl when perceived from the adjacent B1438 road corridor and wider rural setting.

3.10. The creation of landscape buffers and public open spaces also presents an opportunity for the creation of new habitats. At present, the Site comprises an arable field, which is considered to be of limited ecological merit. The creation of new open space as part of the development of this site presents opportunities for the establishment of areas of native wildflower grassland, shrub planting, woodland and wetland features. The open spaces will also seek to draw in the surrounding countryside setting into the heart of the development, further incorporating the development within its locality.

3.11. The perceived tranquillity of the Site, is reduced as a result of the adjacent road corridors, including the busy A12 located approximately 350m east of the Site, high powered overhead electricity pylons, established to the immediate south east and the recent residential development to the immediate north. Ensuring an appropriate offset from the Sites boundaries, together with the reinforcement of the vegetation structure will ensure that the perceived tranquillity of the Site from the road corridors that abut the Site is not compromised.

3.12. The Site also presents a significant opportunity to enhance public access to the countryside, with potential new footpath links taken through the proposed public open spaces. At present, the locality has limited footpath or bridleway coverage. There is an opportunity to create a new network of public rights of way that link the wider rural areas to the settlement edge.

3.13. The key opportunities and constraints associated with the Site are illustrated on Plan ASP3. These opportunities and constraints will inform any future masterplanning to ensure that a sympathetic, landscape-led scheme is achieved.

3.14. It is considered that the approach set out above is in line with the guidance set out within the ‘The Suffolk Landscape Character Assessment to ensure that development does not give rise to significant adverse effects.

3.15. The district-wide assessment identifies a number of characteristics associated with the localised landscape setting of the Site. As set out above, it is considered that the incorporation of a sensitive, landscape-led approach to the development will
minimise the potential landscape effects of the proposed development of the Site upon the receiving landscape. Table 1, below, sets out the potential effects upon the identified characteristics of a sympathetic, considered residential development upon the LCA.

Table 1: Potential Effects on the Key Landscape Characteristics of the ‘Ancient Rolling Farmlands’ Landscape Character Area (LCA 4)’

<table>
<thead>
<tr>
<th>Key Characteristics of Ancient Rolling Farmland LCA</th>
<th>Potential effects arising from development of the Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rolling arable landscape of chalky clays and loams.</td>
<td>Medium adverse – The site does associate with a gently rolling agricultural landscape, that is typical of the wider rural setting. However, the site is not within the neighbouring SLA and is also closely associated with the settlement edge to the immediate north forming a hard and unsympathetic edge to this part of Wickham Market. As such the Site’s sense of rural tranquillity and sensitivity to change is reduced.</td>
</tr>
<tr>
<td>Dissected widely, and sometimes deeply, by river valleys.</td>
<td>None – The site is not closely associated with any watercourses, with the river Deben flowing approximately 2km to the north, beyond the northern edge of Wickham Market and beyond the A12 corridor within the wider landscaper setting to the east.</td>
</tr>
<tr>
<td>Field pattern of ancient random enclosure. Regular fields associated with areas of heathland enclosure.</td>
<td>Medium adverse – Development within the Site, would result in the loss of farmland, however the fields northern boundary has been redefined by the recent adjoining residential development, whilst the study of historic maps, shows from 1881 shows the Site area characterised by several smaller field parcels, which have been lost / merged, giving way to the larger scale field pattern now present.</td>
</tr>
<tr>
<td>Hedges of hawthorn and elm with oak, ash and field maple</td>
<td>Low – A landscape led design approach would ensure that the established native hedgerow along the Site’s</td>
</tr>
<tr>
<td>Topic</td>
<td>Description</td>
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<td>----------------------------------------------------------------------</td>
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<tr>
<td>as hedgerow trees.</td>
<td>eastern boundary would be preserved as part of any future development proposals. The southern boundary is currently undefined and would see significant enhancement through the introduction of a new mixed species native hedgerow, which would also be used to supplement the Site’s western boundary, which displays a low quality, fragmented vegetation structure.</td>
</tr>
<tr>
<td>Substantial open areas created for airfields and by post WWII agricultural improvement.</td>
<td>None- The Site does not associate with any open areas created for airfields or post WWII agricultural improvement.</td>
</tr>
<tr>
<td>Scattered with ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly.</td>
<td>None- the site is not associated with any woodland within its immediate or localised setting, with the nearest small scale woodland block located beyond the A12 corridor, approximately 1km south east. Further notable woodland, is established along the Byng Brook watercourse, within the Site’s wider setting to the west and will not be harmed as a result of development within the Site.</td>
</tr>
<tr>
<td>Network of winding lanes and paths, often associated with hedges, create visual intimacy.</td>
<td>Low adverse- the Site’s eastern boundary is characterised by an established hedgerow, which contains the narrow Chapel lane as it extends south east from the settlement edge. As part of the landscape lead design proposals, this hedgerow would be protected, and a significant development setback established to reduce any harm to the setting of Chapel Lane and the SLA beyond.</td>
</tr>
<tr>
<td>Dispersed settlement pattern of loosely clustered villages, hamlets and isolated farmsteads of mediaeval origin.</td>
<td>Low adverse- a robust green edge would establish a soft green edge to the southern extents of Wickham Market, enhancing the hard edge currently present as a result of the recent residential development established to the immediate north. Development within the Site, would still maintain a significant gap</td>
</tr>
</tbody>
</table>
between the settlements of Wickham Market and Pettistree, retaining the dispersed settlement pattern associated with the character area.

| Farmstead buildings are predominantly timber-framed, the houses colour-washed and the barns blackened with tar. Roofs are frequently tiled, though thatched houses can be locally significant. | None- The site does not contain any farm buildings and is more closely associated with the residential setting to the immediate north. Old School Farm, with its notable silo structure, is located within the settlement edge of Wickham Market, within the localised setting to the north west of the site, however the farmstead is already closely associated with its immediate residential setting and as such would not be significantly harmed by further residential development within the Site. |
| Villages often associated with village greens or the remains of greens. | None- there are no village greens that associate with the site or its setting. |

3.16. In conclusion, it is considered that, subject to the incorporation of the positive landscape mitigation measures set out above, residential development can be integrated within the site without significant adverse effects upon the localised or wider landscape receptor.

3.17. The Site, which is given over to intensive agricultural use is of low biodiversity interest and is typical of the rural setting found to the west, with the mature and well-established vegetation structure established along its eastern boundary providing a degree of containment from the SLA setting to the east. The Site is not considered a valued landscape and is of reduced landscape sensitivity, owing to its association with the adjacent built form and settlement edge to the immediate north and the further urbanising influences, including the B1438 through road which runs immediately adjacent to the Site's western boundary, prominent high voltage electricity pylons and the audible presence of the A12 dual carriageway within the localised setting to the east.
3.18. Overall, whilst it is acknowledged that development within the Site would result in the loss of agricultural greenfield land, it is considered that residential development can be successfully incorporated within the Site, without any significant effects on the key characteristics of the Ancient Rolling Farmlands character area. A high-quality landscape led design approach, would ensure that development can be sensitively incorporated within the village edge setting, with the key landscape elements retained and enhanced through a robust planting scheme and the incorporation of positive development offsets. Given the above, the Site is considered to have capacity, in landscape terms, to accommodate residential development that is of high quality and proportionate, in terms of scale, to the adjacent built form.

Potential Visual Effects

3.19. The potential visual effect on the Sites visual environment has been reviewed, and is detailed within tables 2 and 3 below, which details the effect on Aspect’s viewpoint locations and those which are considered relevant within the emerging Wickham Market Neighbourhood Plan document, ‘Key Views Assessment (April 2018, Issue IV).

Table 2 Visual Assessment

<table>
<thead>
<tr>
<th>Visual Setting</th>
<th>Potential Visual Effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Immediate Setting</td>
<td>• New development to immediate north forms a hard and prominent built edge when viewed from the south, east and west of the Site (refer VP 1, 2 &amp; 3).</td>
</tr>
<tr>
<td></td>
<td>• Potential views available from the residential setting to the north and the adjacent B1438 road corridor to the west owing to reduced vegetation cover along these boundary locations. Views from these locations would be experienced within the context of the surrounding residential built form and prominent village edge which establishes the visual character within the immediate setting of the Site.</td>
</tr>
<tr>
<td></td>
<td>• Views from Chapel Lane (refer VP7), adjacent to the Site’s eastern boundary, are well contained as a result of a mature mixed species native hedgerow established</td>
</tr>
</tbody>
</table>
along this rural lane, which also offers a degree of visual containment from the wider SLA setting to the east.

Suggested Mitigation:

- Reinforce the western and southern boundaries with additional native hedgerow and hedgerow tree planting to enhance the visual approach to the village edge from the south along the B1438.
- Incorporate a development offset from the eastern boundary to preserve the existing vegetation structure along this boundary and preserve the visual setting along the Chapel Lane and the SLA setting beyond.

Localised Setting

- Views from PROW network adjacent to Pettistree’s northern and eastern edge (refer VP4 & 11) are well contained by an established intervening vegetation structure, within a relatively level topography. Potential glimpsed views of new development would be seen within the surrounding village edge context and urban components such as the prominent overhead electricity pylons.
- View from the PROW network to the south are illustrated within VPs 5 and 6.
- VP5 is afforded a high degree of visual containment due to the effects of an established intervening vegetation structure and an undulating landform. Proposed built form would be located within a localised dip, beyond the intervening shallow ridgeline.
- VP6 offers clearer views of the Site, owing to its elevated location and the Site’s open / undefined southern boundary. Rooflines of the adjacent residential development to the immediate north are prominent and inform visual character from this setting. New development would be seen within this visual context.
- Localised views from the SLA setting to the east are assessed via VP 8. Existing settlement edge is prominent and forms a hard edge and unsympathetic
transition with the wider rural setting. The mature hedgerow along Chapel Lane provides some visual containment as you move further south, however there are views available of the site as the road dips towards the village approach.

**Suggested Mitigation:**
- Incorporate a development offset from the eastern boundary to preserve the existing vegetation structure along this boundary and preserve the visual setting along the Chapel Lane and the SLA setting beyond.
- Establish a robust vegetation boundary and incorporate open space along the Site’s southern boundary, to ensure a sensitive transition between the settlement edge and wider rural setting.

### Wider Setting

- Long distance views of the site have been tested to the west and south west (refer VP 10 and 9 respectively). Views are well contained, due to an established intervening vegetation structure, built form and a gently undulating landform. Potential views would be glimpsed only.
- Long distance views to the east are well contained by the presence of the A12 and the established roadside tree belts. To the north, long distance views are contained by built form within Wickham Market.

3.20. Overall, it is considered that the Site is generally afforded a high degree of visual containment from both the localised and wider visual environment as a result of an established intervening vegetation structure and gently undulating landform. It is acknowledged that development within the Site would be seen within the immediate setting as a result of a relatively week vegetation structure that characterises the Site’s western boundary and southern extents, where the Site adjoins the recent development parcel to the north. However, views of the potential development, when seen from these immediate locations, would be evident within the context of the surrounding built form which currently forms a hard settlement edge along the
settlements southern extents and reduces the overall visual sensitivity of the Site itself.

3.21. Potential localised views from the east, within the SLA, and to the south also take in the existing settlement edge, which forms a prominent visual component within these views. Through the incorporation of the proposed landscape enhancements, it is considered that an improved transition between the settlement edge and village approach from the south (along the B1438) can be established, ensuring that any built form is successfully integrated within the wider rural setting in visual terms. As such, it is considered that the Site’s immediate, localised and wider visual environment, has the capacity to incorporate a high quality, landscape led, residential development.

3.22. A review of the ‘Key Views’ as identified within the emerging Wickham Market Neighbourhood Plan document, ‘Key Views Assessment (April 2018, Issue IV)’ has been undertaken. The potential impacts on these protected views is reviewed within the Table 3 below:

Table 3 Review of Key Views (as defined within the Key Views Assessment (April 2018, Issue IV)

<table>
<thead>
<tr>
<th>Viewpoint Location</th>
<th>Potential Visual Effects</th>
</tr>
</thead>
</table>
| Key View 9 (Aspect VP 7) | • Key View 9 is taken from Chapel Lane (refer VP7) adjacent to the Site’s eastern boundary (please note the VP location within the Key View Assessment, is considered to be incorrect, with the actual location considered to be further north and more accurately reflected within Aspect’s Viewpoint Location Plan).  
• The view illustrates the narrow rural lane and is focused on the established built form within the southern extents of the village. The Site is located within the periphery of the view to the east.  
• Important views of the Church spire and Deben Court, would not be affected, with a proposed development offset, suggested along the Site’s eastern boundary, ensuring that views of these built elements are not harmed and the mature hedgerows which align Chapel
3.23. Overall it is considered that there will be no significant impact on the Kew Viewpoints reviewed. The site is located within the periphery of both views and it is considered that development within the Site would have a limited effect on the key visual components noted within the published assessment.

3.24. An excerpt from the key Views Assessment, showing the Key Viewpoint locations, can be found within Appendix 2 of this report.
4. SUMMARY AND CONCLUSIONS

4.1. Aspect Landscape Planning is instructed by Hopkins Homes Ltd. to undertake a review of the landscape and visual matters relating to the land between High Street and Chapel Lane, Pettistree for the potential provision of residential development. The site is illustrated on Plan ASP1 ‘Site Location Plan’ and ASP2 ‘Site and Setting Plan’.

4.2. The site itself comprises the northern section of an agricultural field, which is defined to the east and west by existing road corridors. The eastern site boundary is defined by Chapel Lane, which is lined by a mature mixed native hedgerow, affording a moderate degree of containment from the east. The western site boundary is defined by the busy B1438 road corridor, forming the main transport route within the locality, which is lined by sporadic tree and scrub planting. The eastern site boundary is defined by a more cohesive vegetation structure established along the more rural Chapel Lane road corridor, by a mature mixed species native hedgerow and hedgerow trees, providing a degree of physical and visual containment from this aspect. There is no physical southern site boundary, with the site being perceived as part of the wider field setting. (Refer ASP1 Site Location Plan & ASP2 Site and Setting Plan).

4.3. The Site is not considered a ‘valued’ landscape in relation to the revised NPPF and is of reduced landscape sensitivity, owing to its association with the adjacent built form and further urban elements established within the immediate and localised settings.

4.4. It is considered that if the development adopts a sensitive, landscape led approach it can be integrated without significant harm to the receiving landscape receptor or visual environment. Any development within the site should incorporate the following elements:

- Provide generous high quality open space within the southern extents of the Site to establish a robust green edge between the settlement, the wider rural setting and the setting of Pettistree to the south west.
• Offset development from the site's boundary locations to ensure the long-term protection of the important vegetation structure associated with the site, particularly along the Site's eastern boundary, where an established vegetation structure provides containment from the SLA and Chapel Lane corridor.

• Further Open Space provided along the Site’s northern boundary, will ensure a sensitive transition between the Site and adjacent northern development, whilst establishing a high quality shared landscape setting between the two developments. This approach will also ensure that an important visual break is established between the developments reducing the sense of urban sprawl when perceived from the adjacent B1438 road corridor and wider rural setting.

• Provide new native boundary vegetation along the Site’s western extents, to provide a soft development edge and enhance the village approach from the South.

• Ensure the proposed built form utilises high quality material finishes and landscaping and reflects the scale and quality identified within the neighbouring Taylor Wimpey development.

4.5. It is concluded that the Site has the capacity to accommodate a sensitively designed residential development which will not give rise to significant landscape or visual effects and is in line with adopted and emerging planning policy. It is considered that, from a landscape and visual perspective, potential development of the Site can be supported.
Opportunities to provide a suitable development offset from the existing hedgerow along the eastern site boundary, ensuring its future health and long term growth, whilst maintaining the character of key view 9.

Key View 9 along Chapel Lane as identified in the Wickham Market Neighbourhood Plan. Existing hedgerows along the road corridor emphasise the church spire and Deben Court, which form focal points when approaching from the south east.

Special Landscape Area local designation as identified by Suffolk Coastal District.

Opportunities to retain and enhance existing boundary vegetation, with additional tree and shrub planting gapping up any breaks in along the western and eastern site boundaries.

Opportunities to provide a development offset form the southern site boundary, with open space comprising additional tree, shrub and hedgerow planting redefining the southern site boundary and assisting in the successful integration of the proposals into the receiving landscape setting and visual environment.
APPENDIX 1

PHOTOGRAPHIC RECORD
Recently constructed residential development to the north of the site

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a digital equivalent of a 35mm camera with 50mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 65° and when printed at A3, should be viewed at a distance of 330mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.
Viewpoint 3

Recently constructed residential development to the north of the site

Viewpoint 4

Glimpsed views of recently constructed residential development to the north of the site

Site located beyond intervening vegetation structure

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a digital equivalent of a 35mm camera with 50mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 61° and when printed at A3 should be viewed at a distance of 330mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.
N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a digital equivalent of a 35mm camera with 53mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 55° and when printed at A3 should be viewed at a distance of 330mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.
Viewpoint 7 (Key View 9)

- All Saints Church, Wickham Market
- Sites located beyond intervening vegetation associated with the eastern site boundary
- Existing development associated with the south eastern settlement edge of Wickham Market
- Chapel Lane

Viewpoint 8

- Site
- Recently constructed residential development to the north of the site

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a digital equivalent of a 35mm camera with 55mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 68° and when printed at A3, should be viewed at a distance of 330mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.
Approximate direction of the site located beyond intervening vegetation

Viewpoint 9

Approximate direction of the site located beyond intervening vegetation

Thong Hall

Grove Cottages

Viewpoint 10

N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a digital equivalent of a 35mm camera with 50mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 60° and when printed at A3, should be viewed at a distance of 330mm cued through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.
N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a digital equivalent of a 35mm camera with 50mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 68° and when printed at A3, should be viewed at a distance of 330mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.
APPENDIX 2

KEY VIEW PLAN (EXCERPT FROM EMERGING WICKHAM MARKET NEIGHBOURHOOD PLAN – KEY VIEW ASSESSMENT (APRIL 2018, ISSUE IV).
KEY VIEWS MAP

1. Approach to A12 junction
2. Footpath off Ash Road
3. Allotments, towards church
4. Footpath east of allotments
5. Vicarage Footpath - looking east
6. Bottom of Mill Lane
7. Footpath Green Lane
8. Fowls Watering meadows
9. Chapel Lane, towards the north
10. High Street towards centre
11. Walnuts Lane - looking south
12. Walnuts Lane - view to the east
13. Footpath west of Walnuts Lane
14. Footpath north-west of The Oaks
15. Thong Hall Road, near Gelham Hall
16. Footpath, near Valley Farm
17. Deben Mills

Key

- Viewpoint location and direction
- Definitive and permissive footpaths and Wickham Market Circular Walks
Representation Form

Make a representation on the Suffolk Coastal Final Draft Local Plan

This representation form relates to the Suffolk Coastal Final Draft Local Plan, which has been published under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).

The representations period runs from Monday 14 January to 17.00 on Monday 25 February 2019. Representations received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the Examination.

The representation form can be completed and submitted via:

- The Council’s online consultation system at www.eastsuffolk.gov.uk/finaldraftlocalplan (this is the Council’s preferred way of receiving representations);

- Or complete a representation form (available to download from the consultation system or by contacting the Planning Policy and Delivery Team suffolkcoastallocalplan@eastsuffolk.gov.uk / 01394 444557), and return via email to suffolkcoastallocalplan@eastsuffolk.gov.uk or by post to Planning Policy & Delivery Team, East Suffolk House, Station Road, Riduna Park, Melton, Woodbridge, IP12 1RT.

Before completing a representation, please read the accompanying ‘Guidance when Making a Representation’, available at www.eastsuffolk.gov.uk/finaldraftlocalplan

This form has 2 parts: Part A for personal details and Part B for your representation(s). Please fill in Part B for each representation you wish to make.

By responding to this consultation you are accepting that your name and representation will be available for public inspection and published online in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.
### Name of the DPD to which this representation relates:
Suffolk Coastal Final Draft Local Plan

### PART A | Your Details

#### 1. Personal details

<table>
<thead>
<tr>
<th>Title</th>
<th></th>
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<tbody>
<tr>
<td></td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>First Name</th>
<th>Geoff</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Last Name</th>
<th>Armstrong</th>
</tr>
</thead>
</table>

#### 2. Agent’s Details (if applicable)

<table>
<thead>
<tr>
<th>Title</th>
<th>Mr</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>First Name</th>
<th>Geoff</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Last Name</th>
<th>Armstrong</th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Hopkins Homes Ltd</th>
</tr>
</thead>
</table>

| Address | The Exchange  
Colworth Science Park  
Sharnbrook  
Bedfordshire |
|---------|------------------|

<table>
<thead>
<tr>
<th>Postcode</th>
<th>MK44 1LZ</th>
</tr>
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<table>
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<tr>
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<th></th>
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</thead>
</table>

<table>
<thead>
<tr>
<th>E-mail Address</th>
<th></th>
</tr>
</thead>
</table>
PART B | Your Representation

Please complete a separate form for each representation.

3. To which part of the Local Plan does this representation relate?

Paragraph number [ ] Policy Number SCLP12.61 Policies Map [ ] Appendix [ ]

4. Do you consider that this part of the Plan meets the legal and procedural requirements?

(See guidance note for assistance with this question)

Yes ☐ No ☐

5. Do you consider this part of the Plan has met the tests of soundness?

(See guidance note for assistance with this question)

Yes ☐ No ☐

Please refer to accompanying letter

6. Do you consider this part of the Plan to be unsound because it is not:

(See guidance note for assistance with this question)

Positively prepared ☐ Justified ☐

Effective ☐ Consistent with national policy ☐

7. Details of Representation:

Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

Please see attached letter

www.eastsuffolk.gov.uk/finaldraftlocalplan
8. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound:
You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Please see attached letter

9. If your representation is seeking a change, do you consider it necessary to participate in the public examination?

Please note the Planning Inspector will make the final decision on who will be invited to participate in individual sessions at the public examination, although all members of the public may observe the proceedings.

Yes, I wish to participate at the oral examination ☑

No, I do not wish to participate at the oral examination ☐

10. If you wish to participate in the public examination, please outline why you consider it to be necessary:

In order to participate in discussions at the Public Examination

11. Being kept informed:

Yes, I would like to be kept informed ☑

No, I do not wish to be kept informed of future progress of the plan ☐

12. Date of Representation and signature:

Date
25.02.2019

Signature

www.eastsuffolk.gov.uk/finaldraftlocalplan
Data protection
The information you have supplied is being collected in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. By returning this form you consent to Suffolk Coastal District Council holding and using your information in this way.

By responding to this consultation you are accepting that your name and response will be available for public inspection and published on line in accordance with the Act stated above. However, personal/email addresses, and telephone numbers will not be published.

After the end of the representations period, the Council will submit all representations received to the Secretary of State in a secure manner, this will include any personal data you have supplied.

Data will be processed and held in accordance with the Data Protection Act 1998 (and any updates). Data will be retained securely until the Local Plan is superseded or by the end of the plan period (April 2036) whichever is the earlier date.

Further information about data protection can be found on the East Suffolk website http://www.eastsuffolk.gov.uk/yourcouncil/access-to-information/data-protection-act/
Dear Sir/Madam

Representations to Suffolk Coastal Local Plan Final Draft
Policy SCLP12.61 Land between High Street and Chapel Lane, Wickham Market (Pettistree)

Overview

On behalf of our client Hopkins Homes Limited we wish to make representations to the current Suffolk Coastal Local Plan Final Draft consultation in respect of the proposed SCLP12.61 Land between High Street and Chapel Lane, Wickham Market (Pettistree) following on from our previous submissions made to the Issues and Options consultation in October 2017 and First Draft Local Plan in September 2018.

Hopkins Homes welcome the proposed allocation for approximately 150 dwellings, and particularly the uplift in the number of dwellings from 120 from the First Draft Local Plan. The site forms a deliverable option in the context of the NPPF which is well related to the existing settlement and specifically their adjacent development at Wickham Place and has no insurmountable constraints to development. The site is in single ownership and is subject of an option held by Hopkins Homes who is committed to delivering a high quality development on the site and intend to move the proposal forward at pace within the first five years of the plan period. In this regard, Hopkins Homes are commencing preparation of a planning application for the site and intend to progress to a submission within the next few months.

Whilst Hopkins Homes welcome the proposed allocation, they however wish to object to wording of the policy and a number of the policy criteria as drafted on the basis that they fail to meet the tests of soundness in the context of paragraph 35 of the NPPF. We set out below the changes sought to the policy to enable it to be considered sound.
Representations

Development Area

It should be noted that as drafted there is an inaccuracy in the areas proposed as part of the policy criteria – 4ha of built development, 2.15ha of open space and 0.1ha of land for a new early years setting amounts to 6.25ha whereas the site only extends to a total of 6.15ha.

Notwithstanding this, given the requirements of the policy to provide 2.15ha of open space, coupled with the likely surface water drainage requirements and necessity to provide a low density scheme in accordance with the prevailing surrounding character, it is considered that a larger site area should be considered for allocation in order to appropriately deliver the 150 dwellings proposed by the policy.

The plan below identifies the full extent of land available to Hopkins Homes which comprises some 8ha. The allocation boundary as proposed does not follow any field boundary and as such there would be no greater landscape harm as a consequence of its extension.

In the event that an increase in the site area is not agreed, Hopkins Homes consider that the specific requirement of 2.15ha of open space should be removed from the policy and reserve their position to negotiate an appropriate/suitable provision of open space having regard to the site and other material considerations.

Figure 1. Extent of land available to Hopkins Homes

Change sought: The site area should be amended from 6.15ha to approximately 8ha.
We respond below to other elements of the policy as drafted:

a) A mix of dwelling types including housing to meet the needs of older people and provision of self-build plots on a developed area of approximately 4ha within the site

The NPPF is clear at paragraph 61 that housing needs for different groups in the community should be assessed and reflected in planning policies. In this regard, the Plan provides no evidence that consideration has been given to any actual assessed need or demand for housing to meet the needs of the older population in Pettistree. It is considered that the overly restrictive criteria may serve to discourage planning applications coming forward where this policy requirement may not be appropriate for the local context and would therefore adversely affect the delivery of housing and the enabling of sustainable development. Accordingly, it is considered that the policy’s strategy is not based upon objectively assessed development requirements or proportionate evidence and is therefore not positively prepared or justified and is unsound.

In terms of the requirement for self build plots, our accompanying supporting representations reference GA/EW/05017/L0023 continue to raise significant concerns overall to the proposed self-build Policy SCLP5.9 on the basis that the express requirement for such provision on larger housing sites pays no consideration to actual assessed need or demand for such provision in specific locations. Furthermore, it is unlikely that those interested in self-build projects would wish to build a unit on part of a new housing development. Concern has also been raised that if self-build plots are not developed, there will be an unnecessary delay in housing delivery and build programmes would inevitably be disrupted if it was not known whether or not a small number of plots would eventually be available to the developer if no interest is forthcoming in such plots. Our supporting representations also confirm that these are concerns shared by the Home Builders Federation (HBF) and a number of Local Plan Inspectors examining similar policies. The requirement for at self-build plots in Policy SCLP12.61 would result in an unnecessary burden which would constrain the delivery of housing. The requirement is not based upon any evidence of objectively assessed development requirements in the area and is therefore not positively prepared or justified.

**Change sought:** A more flexible approach should be provided within the wording of Criterion (a) to allow proposals to be considered having regard to specific local housing need and market demand at the particular time in which a planning application is made. In addition, Criterion (a) should be amended to refer instead to self-build plots being permitted on the site having regard to the evidence of need in the area, informed by the Council’s Self Build and Custom Housebuilding Register, at the time of a planning application.

b) Provision of affordable housing on site

It is considered that this criterion, which simply requires the provision of affordable housing, is unclear and to be effective and therefore sound, the policy should state the actual affordable housing requirement for the site, cross referring to Policy SCLP5.10 of the Plan (proposals for residential development with capacity for ten units or more to be expected to make provision for 1 in 3 units to be affordable dwellings). Reference should also be made to the requirements of paragraph 64 of the NPPF which expects at least 10% of the homes on major sites to be available for affordable home ownership.

**Change sought:** Criterion (b) should be amended to state the actual requirement for affordable housing on the site.

c) Provision of 0.1ha of land for a new early years setting if needed

With regard to the new criteria for land to be reserved for an early years setting on the site, the NPPF states at paragraph 35 that for plans to be considered sound, they must be justified which it defines as comprising “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” In this regard, the Plan is not supported by any evidence to demonstrate that there is a current
deficit in pre-school places in Wickham Market. There is furthermore no evidence to justify how the allocation would generate sufficient demand to require the specific provision of 0.1ha or that other alternative options have been investigated either through physical expansion or longer opening hours of existing provisions or the likelihood that new private sector nurseries would open to meet any increased demand. Seeking provision of a new early years setting is therefore only justified when there is clear evidence that the private sector cannot expand to meet needs or requires support to be able to expand. The requirement has not been demonstrated by proportionate evidence which fails the tests of soundness. Furthermore, the wording ‘if needed’ is not effective as it fails to give clear guidance to the decision maker.

**Change sought:** Criterion (c) of Policy SCLP12.61 should be deleted.

We trust that these comments will be given due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact me.

Yours faithfully

Geoff Armstrong
Director
Armstrong Rigg Planning
Proposed Policy Changes

Policy SCLP12.61: Land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market)

6.15ha Approximately 8ha of land between High Street and Chapel Lane, Pettistree (adjoining Wickham Market) is identified for the development of approximately 150 dwellings.

Development will be expected to accord with the following criteria:

a) A mix of dwelling types including housing to meet the needs of older people and provision of self-build plots on a developed area of approximately 4ha within the site; having regard to specific local housing need and market demand at the particular time in which a planning application is made. Self-build plots will be permitted having regard to the evidence of need in the area, informed by the Council’s Self Build and Custom Housebuilding Register;

b) Provision of affordable housing on site which should include at least 10% of the total number of dwellings provided as affordable home ownership with the remainder in accordance with Policy SCLP5.10 of the Plan;

c) Provision of 0.1ha of land for a new early years setting if needed;

d) Provision of approximately 2.15ha open space to create a ‘soft’ and distinctive gateway to Wickham Market, and provide for all ages;

e) Provision of landscaping and creation of a ‘soft’ edge to the southern boundary of the development;

f) Provision of pedestrian connectivity with footpaths to the north on the B1438;

g) Proportionate archaeological assessment will be required;

h) Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided; and

i) A site-specific Flood Risk Assessment will be required, and any necessary mitigation provided.
Appendix 4

Suffolk County Council Early Years Report
Childcare Sufficiency Assessment (CSA)

Suffolk County Council
Early Years and Childcare Service
places. However, because Brandon closely borders Norfolk some children may be accessing childcare provision in this county.

There are a considerable number of people employed in the horseracing industry in Newmarket. This employment places demand for a more bespoke offer of childcare hours. Families often require childcare early in the morning and again early in the afternoon. However, because Newmarket closely borders Cambridgeshire some children may be accessing childcare provision in this county. In Severals ward, £26,641 developer contributions was used towards the creation of 37 full time equivalent places. In Exning ward, £6,185 was used towards the creation of 36 full time equivalent places.

Section 1.04 Cluster Sufficiency Overview Framlingham and Leiston

Map of Framlingham and Leiston Cluster – All Providers

<table>
<thead>
<tr>
<th>Provider Type</th>
<th>LOP</th>
<th>Non LOP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Childminder</td>
<td>14</td>
<td>8</td>
</tr>
<tr>
<td>Day Nursery</td>
<td>5</td>
<td>1</td>
</tr>
<tr>
<td>Nursery Units of Independent Schools</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Pre-School Playgroup</td>
<td>4</td>
<td>0</td>
</tr>
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</table>

December 2018
Page 39 of 71
<table>
<thead>
<tr>
<th>Maintained Nursery School / Academy Nursery Class</th>
<th>3</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Out of School Care</td>
<td>0</td>
<td>5</td>
</tr>
</tbody>
</table>

*Data Source: Cluster work spreadsheet and school census*

Table 2 Places available for cluster (LOP only)

<table>
<thead>
<tr>
<th>Total Baseline Population (eligible 2s plus all 3 and 4yr olds)</th>
<th>617</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of 15 hr places needed (baseline plus 30 hours projection)</td>
<td>893</td>
</tr>
<tr>
<td>Total places</td>
<td>959</td>
</tr>
<tr>
<td>Diff places available</td>
<td>66</td>
</tr>
</tbody>
</table>

*Data Source: SCC Sufficiency spreadsheet*

Table 2a Places available for cluster (LOP only) with migration considered

<table>
<thead>
<tr>
<th>NET Migration</th>
<th>-4.08%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Baseline Population (adjustment with migration considered)</td>
<td>591</td>
</tr>
<tr>
<td>Total Number of 15 hr places needed (adjustment with migration considered)</td>
<td>856</td>
</tr>
<tr>
<td>Total Places</td>
<td>959</td>
</tr>
<tr>
<td>Difference places available</td>
<td>102</td>
</tr>
</tbody>
</table>

* A positive number means more children migrated into the cluster for places than migrated out. A negative number means more migrated out.

Table 3 Current take up for cluster

<table>
<thead>
<tr>
<th>Eligible 2yr olds</th>
<th>93%</th>
</tr>
</thead>
<tbody>
<tr>
<td>3yr olds</td>
<td>95%</td>
</tr>
<tr>
<td>4yr olds</td>
<td>112%</td>
</tr>
</tbody>
</table>

*Data Source: SCC take up data Summer 18*

Framlingham/Leiston Cluster consists of 7 wards, Aldeburgh, Framlingham, Leiston, Hacheston, Saxmundham, Peasenhall and Yoxford and Wickham Market. This is predominantly a rural cluster with the main arterial road, A12 dividing it. There is a surplus of 66 places. After taking migration of children in and out of the cluster into consideration, there is a surplus of 102. This is because 15% of children living in this cluster migrate out. Children tend to migrate to Woodbridge and Kesgrave and High Suffolk. Only 9.59% of children attending provision in this cluster come from other clusters. The surplus of places is not necessarily in areas where they are needed.

There are two main factors to consider as to why the 4 year old take up exceeds 100% of the 4 year old population. One is that some children will be migrating from another cluster to access provision in this cluster. These children are not included in the population. Secondly ONS population data is used as a baseline and there may be an underestimate of the number of 4 year olds living in this cluster. Suffolk’s overall take up for 4 year olds is currently 94%.

Take up of places for 2 year olds exceeds Suffolk’s overall take up, currently 79%. 3 year olds also exceed Suffolk’s overall take up, currently 94%.
In the Cluster two new providers, term time only, opened in the Summer 2018, one a daycare provider providing 12 places and another a school nursery. Recent work in Saxmundham created 24 full time equivalent places, all year round from September 2018. This was partly funded by developer contributions, £79,736. All provision in the Saxmundham area is all year round.

In the Framlingham ward there is no group provision operating all year round. The school nursery is mornings and lunch only. A new provider which would provide 28 early education places all year round, 8 a.m.-6 p.m. is planning to open in January 2019. Another provider is planning to move into this ward from a neighbouring ward. Work has not yet started on this site. This provision would also provide all year round childcare. Three Ofsted registered childminders are planning to offer early education in the future and support is currently being provided to enable this to happen. Term time only provision is also considering offering a holiday club. SCC is currently working to develop places in wards with high demand or where there is additional housing growth new places are being developed.
Pre-Planning Assessment Report
LAND AT PETTISTREE 148791/903871269/1/0062061

Report published 12/07/2019
Section 1: Proposed development

Thank you for submitting a pre-planning enquiry. This has been produced for Ingent Consulting Engineers Ltd. Your reference number is 148791/903871269/1/0062061. If you have any questions upon receipt of this report, please contact the Pre-Development team on 03456 066087 or email planningliaison@anglianwater.co.uk.

The response within this report has been based on the following information which was submitted as part of your application:

<table>
<thead>
<tr>
<th>List of planned developments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Type of development</strong></td>
</tr>
<tr>
<td>Dwellings</td>
</tr>
</tbody>
</table>

The anticipated residential build rate is:

<table>
<thead>
<tr>
<th>Year</th>
<th>Y1</th>
<th>Y2</th>
<th>Y3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Build rate</td>
<td>50</td>
<td>50</td>
<td>50</td>
</tr>
</tbody>
</table>

Site grid reference no.

TM3036255216

Development type

Greenfield

Planning application status

Unknown

The comments contained within this report relate to the public water mains and sewers indicated on our records. Your attention is drawn to the disclaimer in the useful information section of this report.
Section 2: Assets affected

Our records indicate that we have the following types of assets within or overlapping the boundary of your development site as listed in the table below.

Additionally, it is highly recommended that you carry out a thorough investigation of your proposed working area to establish whether any unmapped public or private sewers and lateral drains are in existence. We are unable to permit development either over or within the easement strip without our prior consent. The extent of the easement is provided in the table below. Please be aware that the existing water mains/public sewers should be located in highway or open space and not in private gardens. This is to ensure available access for any future maintenance and repair and this should be taken into consideration when planning your site layout.

<table>
<thead>
<tr>
<th>Asset type</th>
<th>Pipe size (mm)</th>
<th>Total easement required (m)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water mains</td>
<td>102</td>
<td>4.50 m either side of the centre line</td>
</tr>
<tr>
<td>Water mains</td>
<td>101</td>
<td>4.50 m either side of the centre line</td>
</tr>
<tr>
<td>Water mains</td>
<td>101</td>
<td>4.50 m either side of the centre line</td>
</tr>
<tr>
<td>Sewer mains</td>
<td>100</td>
<td>3.00 m either side of the centre line</td>
</tr>
<tr>
<td>Sewer mains</td>
<td>225</td>
<td>3.00 m either side of the centre line</td>
</tr>
<tr>
<td>Sewer mains</td>
<td>225</td>
<td>3.00 m either side of the centre line</td>
</tr>
</tbody>
</table>

If it is not possible to avoid our assets then these may need to be diverted in accordance with Section 185 of the Water Industry Act (1991). You will need to make a formal application if you would like a diversion to be considered.

Source Protected Zone

We note that the site falls within a Source Protection Zone, we have assessed the potential impact of the site and have concluded that there is no risk to our potable water source.

Due to the private sewer transfer in October 2011 many newly adopted public used water assets and their history are not indicated on our records. You also need to be aware that your development site may contain private water mains, drains or other assets not shown on our records. These are private assets and not the responsibility of Anglian Water but that of the landowner.

Section 3: Water recycling services

In examining the used water system we assess the ability for your site to connect to the public sewerage network without causing a detriment to the operation of the system. We also assess the receiving water recycling centre and determine whether the water recycling centre can cope with the increased flow and influent quality arising from your development.

Water recycling centre

The foul drainage from the proposed development is in the catchment of Wickham Market Water Recycling Centre, which currently has capacity to treat the flows from your development site. Anglian Water cannot reserve capacity and the available capacity at the water recycling centre can be reduced at any time due to growth, environmental and regulation driven changes.

Used water network
Our assessment has been based on development flows connecting to the nearest foul water sewer of the same size or greater pipe diameter to that required to drain the site. The infrastructure to convey foul water flows to the receiving sewerage network is assumed to be the responsibility of the developer. Conveyance to the connection point is considered as Onsite Work and includes all work carried out upstream from of the point of connection, including making the connection to our existing network. This connection point has been determined in reference to the calculated discharge flow and on this basis, a 150mm internal diameter pipe is required to drain the development site. The nearest practicable connection is to the 225mm diameter sewer at manhole 4302 in Chapel lane at National Grid Reference NGR TM30485535. The cover level is 22m and the invert level is 20m. Anglian water has assessed the impact of gravity flows from the planned development to the public foul sewerage network. We can confirm that this is acceptable as the foul sewerage system, at present, has available capacity for your site. Please note that Anglian Water will request a suitably worded condition at planning application stage to ensure this strategy is implemented to mitigate the risk of flooding.

It is assumed that the developer will provide the necessary infrastructure to convey flows from the site to the network. Consequently, this report does not include any costs for the conveyance of flows.

**Surface water disposal**

You indicated on the Pre-Planning Application form that a connection to the public surface water sewer network is not required as infiltration techniques can be utilised. Therefore a capacity assessment has not been made on the public surface water network.

As you may be aware, Anglian Water will consider the adoption of SuDs provided that they meet the criteria outline in our SuDs adoption manual. This can be found on our website at [http://www.anglianwater.co.uk/developers/suds.aspx](http://www.anglianwater.co.uk/developers/suds.aspx). We will adopt features located in public open space that are designed and constructed, in conjunction with the Local Authority and Lead Local Flood Authority (LLFA), to the criteria within our SuDs adoption manual. Specifically, developers must be able to demonstrate:

1. Effective upstream source control,
2. Effective exceedance design, and
3. Effective maintenance schedule demonstrating than the assets can be maintained both now and in the future with adequate access.

If you wish to look at the adoption of any SuDs then an expression of interest form can be found on our website at: [http://www.anglianwater.co.uk/developers/suds.aspx](http://www.anglianwater.co.uk/developers/suds.aspx)

The proposed method of surface water disposal is not relevant to Anglian Water; we suggest that you contact the relevant Local Authority, Lead Local Flood Authority, the Environment Agency or the Internal Drainage Board, as appropriate.

**Trade Effluent**

We note that you do not have any trade effluent requirements. Should this be required in the future you will need our written formal consent. This is in accordance with Section 118 of the Water Industry Act (1991).

**Used Water Budget Costs**

As a result of the recent charging rules published by Ofwat, our charging regime has changed. Your development site will be required to pay a Zonal charge for each new property connecting to the public sewer that benefits from Full planning permission.

Payment of the Zonal charge must be made before premises are connected to the public sewer. More information on the Zonal charge can be found at [http://www.anglianwater.co.uk/developers/charges](http://www.anglianwater.co.uk/developers/charges)

The Zonal charge consists of two elements. The first is called the ‘Fixed Element’ which is the same in nature to the Infrastructure charge applied prior to April 2018. The second is called the ‘Variable Element’ which may vary each financial year.
The elements are combined together to create the 2018/19 Zonal charge for Sewerage:

<table>
<thead>
<tr>
<th>Element</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fixed Element</td>
<td>£ 370</td>
</tr>
<tr>
<td>Variable Element</td>
<td>£ 101</td>
</tr>
</tbody>
</table>

In most circumstances zonal charges are raised on a standard basis of one charge per new connection (one for water and one for sewerage). However, if the new connection is to non-household premises, the fixed element is calculated according to the number and type of water fittings in the premises. This is called the "relevant multiplier" method of calculating the charge. Details of the relevant multiplier for each fitting can be found at our web-page: http://www.anglianwater.co.uk/developers/charges/

The total Zonal charge payable for your site for Sewerage is:

<table>
<thead>
<tr>
<th>Zonal charge per new connection - Sewerage</th>
<th>No. Of Units</th>
<th>Total amount payable</th>
</tr>
</thead>
<tbody>
<tr>
<td>£ 471</td>
<td>150</td>
<td>£ 70,650.00</td>
</tr>
</tbody>
</table>

It has been assumed that the onsite used water network will be provided under a section 104 Water Industry Act application.

It is recommended that you also budget for connection costs. Please note that we offer alternative types of connections depending on your needs and these costs are available at our website.

**Section 4: Map of Proposed Connection Points**

![Map of Proposed Connection Points](image)

*Figure 1: Showing your used water point of connection*

**Section 5: Useful Information**

**Used water**

**Water Industry Act – Key Used Water Sections:**

**Section 98:**

This provides you with the right to requisition a new public sewer. The new public sewer can be constructed by Anglian Water on your behalf. Alternatively, you can construct the sewer yourself under section 30 of the Anglian Water Authority Act 1977.

**Section 102:**
This provides you with the right to have an existing sewerage asset vested by us. It is your responsibility to bring the infrastructure to an adoptable condition ahead of the asset being vested.

**Section 104:**

This provides you with the right to have a design technically vetted and an agreement reached that will see us adopt your assets following their satisfactory construction and connection to the public sewer.

**Section 106:**

This provides you with the right to have your constructed sewer connected to the public sewer.

**Section 185:**

This provides you with the right to have a public sewerage asset diverted.

Details on how to make a formal application for a new sewer, new connection or diversion are available on our website at http://www.anglianwater.co.uk/developers or via our Development Services team on 03456 066087.

**Sustainable drainage systems:**

Many existing urban drainage systems can cause problems of flooding, pollution or damage to the environment and are not resilient to climate change in the long term. Therefore our preferred method of surface water disposal is through the use of Sustainable Drainage Systems (SuDS). SuDS are a range of techniques that aim to mimic the way surface water drains in natural systems within urban areas. For more information on SuDS, please visit our website at http://www.anglianwater.co.uk/developers/suds.aspx. We also recommend that you contact the Local Authority and Lead Local Flood Authority (LLFA) for the area to discuss your application.

**Private sewer transfers:**

Sewers and lateral drains connected to the public sewer on the 1 July 2011 transferred into Water Company ownership on the 1 October 2011. This follows the implementation of the Floods and Water Management Act (FWMA). This included sewers and lateral drains that were subject to an existing Section 104 Adoption Agreement and those that were not. There were exemptions and the main non-transferable assets were as follows:

- Surface water sewers and lateral drains that did not discharge to the public sewer, e.g. those that discharged to a watercourse.
- Foul sewers and lateral drains that discharged to a privately owned sewage treatment/collection facility.
- Pumping stations and rising mains will transfer between 1 October 2011 and 1 October 2016.

The implementation of Section 42 of the FWMA will ensure that future private sewers will not be created. It is anticipated that all new sewer applications will need to have an approved section 104 application ahead of a section 106 connection.

**Encroachment:**

Anglian Water operates a risk based approach to development encroaching close to our used water infrastructure. We assess the issue of encroachment if you are planning to build within 400 metres of a water recycling centre or, within 15 metres to 100 metres of a pumping station. We have more information available on our website at http://anglianwater.co.uk/developers/encroachment.aspx

**Locating our assets:**
Maps detailing the location of our water and used water infrastructure including both underground assets and above ground assets such as pumping stations and recycling centres are available from . All requests from members of the public or non-statutory bodies for maps showing the location of our assets will be subject to an appropriate administrative charge. We have more information on our website at: http://www.anglianwater.co.uk/developers/our-assets/

Summary of charges:

A summary of this year’s water and used water connection and infrastructure charges can be found at http://www.anglianwater.co.uk/developers/charges

Disclaimer:

The information provided in this report is based on data currently held by Anglian Water Services Limited (‘Anglian Water’) or provided by a third party. Accordingly, the information in this report is provided with no guarantee of accuracy, timeliness, completeness and is without indemnity or warranty of any kind (express or implied).

This report should not be considered in isolation and does not nullify the need for the enquirer to make additional appropriate searches, inspections and enquiries. Anglian Water supports the plan led approach to sustainable development that is set out in the National Planning Policy Framework (‘NPPF’) and any infrastructure needs identified in this report must be considered in the context of current, adopted and/or emerging local plans. Where local plans are absent, silent or have expired these needs should be considered against the definition of sustainability holistically as set out in the NPPF.

Whilst the information in this report is based on the presumption that proposed development obtains planning permission, nothing in this report confirms that planning permission will be granted or that Anglian Water will be bound to carry out the works/proposals contained within this report.

No liability whatsoever, including liability for negligence is accepted by Anglian Water, or its partners, employees or agents, for any error or omission, or for the results obtained from the use of this report and/or its content. Furthermore in no event will any of those parties be liable to the applicant or any third party for any decision made or action taken as a result of reliance on this report.

This report is valid for the date printed and the enquirer is advised to resubmit their request for an up to date report should there be a delay in submitting any subsequent application for water supply/sewer connection(s).