

Wickhambrook Neighbourhood Development Plan 2023-2041

**A report to West Suffolk Council on the
Wickhambrook Neighbourhood Development Plan**

**Andrew Ashcroft
Independent Examiner
BA (Hons) MA, DMS, MRTPI**

Director – Andrew Ashcroft Planning Limited

Executive Summary

- 1 I was appointed by West Suffolk Council in May 2025 to carry out the independent examination of the Wickhambrook Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 6 June 2025.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It proposes a site for mixed-use development, and includes policies on local green spaces, design, and the natural environment.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
4 August 2025

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Wickhambrook Neighbourhood Development Plan 2023-2041 ('the Plan').
- 1.2 The Plan was submitted to West Suffolk Council (WSC) by Wickhambrook Parish Council (WPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises indirectly from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the development plan. It provides a context in which the neighbourhood area can maintain its character and appearance.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Plan would then be used to determine planning applications within the neighbourhood area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by WSC, with the consent of WPC, to conduct the examination of the Plan and to prepare this report. I am independent of both WSC and WPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 42 years' experience either in various local authorities at either Head of Planning or Service Director level or since 2016 as an independent examiner. I have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met subject to the modifications in this report.

3 Procedural Matters

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

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the Design Guidance and Codes
- the Local Green Spaces justification
- the HRA screening reports
- the Environmental Report
- the Landscape Appraisal
- the Site Masterplanning Studies
- the Housing Needs Survey Report
- the representations made to the Plan.
- WPC's responses to the clarification note.
- the adopted West Suffolk Local Plan.
- the National Planning Policy Framework (December 2023 and December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 6 June 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the detail within the package of submission documents.

The update of the NPPF

3.4 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.5 The Plan was submitted on 11 March 2025. On this basis, the examination of the Plan against the basic condition that it should regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

- 3.6 Paragraph 6.2 of this report sets out full extent of the basic conditions against which a neighbourhood plan is examined.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), WPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and the policies in the Plan. It is presented in a concise fashion and is supported by nine detailed appendices. The Statement summarises the approach which WPC took on consultation and engagement as the Plan was being prepared.
- 4.3 Section 2 of the Statement comments about the initial phases of engagement which led up to the pre-submission version of the Plan. Section 3 of the Statement provides specific details on the consultation processes that took place on the pre-submission version of the Plan (November to December 2023).
- 4.4 Section 4 of the Statement summarises the comments received on the pre-submission version of the Plan and provides details of the ways in which the document was refined because of this process. Section 4 is supported by the details in Appendices 7-9. This information helps to describe the way in which the Plan evolved.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. WSC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted Plan was undertaken by WSC. It ended in May 2025. This exercise generated representations from the following organisations:
- ET Claydon and Sons
 - Suffolk Wildlife
 - Historic England
 - National Highways
 - Natural England
 - Sport England
 - West Suffolk Council
- 4.7 Representations were also received from parishioners.

- 4.8 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Wickhambrook. As the Plan describes, Wickhambrook is a scattered village based on eleven Greens, ten miles from Bury St Edmunds, Newmarket, Clare, and Haverhill. The Greens follow an Anglo-Saxon settlement pattern of small farms and scattered groups of houses beside the fields. Its population in 2021 was 1,219 persons. It was designated as a neighbourhood area on 4 October 2021 and then revised on 3 April 2023 following local boundary changes.
- 5.2 Wickhambrook takes the form of a main village cluster, and three hamlets (Boyden End, Malting End and Park Gate). There are then a set of further 'Greens' which each feature a farmhouses, cottages, and more modern houses, strung out on a network of narrow, single-track lanes. Wickham Street and Clopton are also distinct clusters within the parish.
- 5.3 The main built-up part of Wickhambrook is focused around the area originally known as Thorns and Nunnery Green, where the bulk of development has taken place over recent years. It also includes the primary school, heath centre, village shop, Memorial Social Centre, recreation ground and other village facilities. The remainder of the parish is primarily rural and in agricultural use.

Development Plan Context

- 5.4 The West Suffolk Local Plan was adopted on 15 July 2025. The submitted neighbourhood plan was developed as the Local Plan was being prepared and has carefully ensured that its policies and approach were consistent with the evolving Local Plan.
- 5.5 Policy SP13 of the Plan identifies a Settlement Hierarchy. Wickhambrook is one of a series of Local Service Centres. The Plan advises that these settlements tend to have fewer homes than key service centres and a smaller range of services but will have as a minimum a primary school and convenience shop or community run shop and/or post office and village hall. It also comments that these settlements are less accessible than the higher order settlements but can still meet some needs of other nearby smaller settlements. Active travel links and public transport provision from local service centres to the larger settlements will, where appropriate, be required to be improved and new active travel links made, as they offer access to a wide range of services and facilities. The policy also advises that each local service centre's capacity to support planned and additional growth has been carefully assessed according to its individual opportunities and constraints, resulting in a different apportionment of the overall district's future growth needs.
- 5.6 The Local Plan allocates a site of 2.70 hectares west of Bunters Road, for around 40 homes and community facilities and/or retail or local employment (Policy AP52). It advises that the types and locations of these uses within the site will be determined through the neighbourhood plan.

5.7 The following other strategic policies in the Local Plan are relevant to the submitted Plan:

- Policy SP1 The climate and environment emergency and sustainable development
- Policy SP2 Flood risk and sustainable drainage
- Policy SP4 Design
- Policy SP14 Housing needs
- Policy SP15 Neighbourhood plans
- Policy SP16 Affordable Housing
- Policy SP17 Housing type and tenure
- Policy SP23 General employment and rural employment areas
- Policy SP24 Economic development and essential utilities in the countryside

5.8 The Plan has been prepared within this wider context and has relied on up-to-date information. It also seeks to give a local dimension to the relevant policies in the Local Plan. This is best practice, and the approach taken is helpfully captured in the Basic Conditions Statement.

Visit to the neighbourhood area

5.9 I visited the neighbourhood area on 6 June 2025. I approached it from the Hargrave/Hargrave Green to the north. This helped me to understand its position in the wider landscape.

5.10 I looked initially at the village centre of Wickhambrook. I saw its range of community and commercial services. The importance of the local shop was self-evident. I also took the opportunity to look at the proposed housing allocation off Bunters Road

5.11 I also looked at the proposed Local Green Spaces in the village. In doing so, I saw the first-class development of modern housing in The Meadows.

5.12 Throughout the visit I looked at the three hamlets of Boyden End, Malting End and Park Gate. I noted their characters, and their relationship with Wickhambrook. I also looked at the relevant proposed Local Green Spaces.

5.13 I left the neighbourhood area and drove to Newmarket to the north and west. As with the initial part of the visit, this helped me to understand its position in the wider landscape and its accessibility to the strategic road network (A14).

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan in the area;
 - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

- 6.3 For the purposes of this examination, the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Wickhambrook Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the West Suffolk Local Plan;
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

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

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy, including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on development and environmental matters and allocates a site for mixed-use development.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. The Guidance also advises that policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted, the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan will achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies to establish a spatial strategy for the parish (Policy WHB1), for a housing/mixed use allocation (Policy WHB2), and for employment development (Policies WHB 5 and 6). In the social dimension, it includes policies on housing design (Policy WHB3), local green spaces (Policy WHB9), community facilities (Policy WHB15), and open spaces (Policy WHB16). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on low energy homes (Policy WH4), on landscape character (Policy WHB7), on biodiversity (Policy WHB8), and on design (Policy WHB11). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

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

- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, WPC commissioned the preparation of an Environmental Report for the Plan. The report (February 2025) is thorough and well-constructed. It concludes that:

'Minor positive effects are concluded for the biodiversity and geodiversity SEA topic. This is because the policy framework seeks to safeguard and enhance local biodiversity, as well as delivering a 10% net gain, amongst a number of other things.

Neutral effects are considered likely for the historic environment SEA theme, as well as the climate change and flood risk SEA topic. With regard to historic environment, it is concluded that the policy framework ensures that new development in the area respects and integrates with the historic environment. For climate change and flood risk, the policy framework focuses on reduction of flood risk and promotion of sustainable development. These policies ensure that new developments incorporate flood mitigation measures and energy-efficient building techniques, contributing to climate resilience.

Minor negative effects are expected for land, soil and water resources and transportation. This is because development in the neighbourhood area is likely to lead to the loss of productive agricultural land, and the area is very constrained with regards to water. Also, for the transportation SEA theme, despite efforts to promote active travel and improve traffic safety, the neighbourhood area is poorly served by public transport, leading to a reliance on private vehicles. The policy framework supports active transport, but minor negative effects are still expected due to likely car dependency.

With regard to the landscape SEA theme, minor negative effects are also concluded as most likely given the greenfield development proposed (whilst noting a lack of brownfield alternatives). It is considered that the spatial strategy and policy framework seek to ensure that new developments respect and enhance the local landscape. Further, the policy framework helps to mitigate/ reduce any likely negative impacts, maintaining and enhancing the village's character and distinctiveness.'

- 6.15 Section 5 of the Report also considers reasonable alternatives and assesses the following options:
- Option 1: The preferred site in what was the emerging Local Plan, a smaller version of site WS195(A) 'Land South of Bunters Road' for 40 new dwellings – referred to as 'Land West of Bunters Road';

- Option 2: Site WS192(A) 'Land North of Bunters Road' for 63 dwellings; and
- Option 3: Site WS190 'Land South of Bunters Road' and site WS212 'Land at Cemetery Hill' delivering 49 homes combined (29 and 20 new homes respectively).

- 6.16 The preferred approach identified in the Report is Option 1 – the allocation of the 'Land West of Bunters Road' site. The Report advises that 'given that the emerging West Suffolk Local Plan identified the site west of Bunters Road (Option 1) for development, the draft Neighbourhood Plan has adopted the same strategy for the location of development in the neighbourhood area in order to meet the Local Plan housing requirement. To do otherwise would have resulted in the amount of future housing growth being doubled through the allocation of additional sites. The selection of the site in the Draft Local Plan was made through assessing potential sites and suitability through the West Suffolk Strategic Land Availability Assessment.'
- 6.17 I am satisfied that the approach taken is robust and helpfully underpins the details in the submitted Plan.

Habitats Regulations Assessment

- 6.18 WPC also commissioned a Habitats Regulations Assessment (HRA) of the Plan. The report (January 2025) is very comprehensive. It assesses the impact of the policies in the Plan on the following protected sites:
- Breckland SPA - 7.1km north of the parish;
 - Breckland SAC - 13.1km north of the parish;
 - Fenland SAC - 13.8km northeast of the parish;
 - Chippenham Fens Ramsar - 13.8km northeast of the parish; and
 - Devil's Dyke SAC - 12.5km east of the parish

- 6.19 The screening assessment of the policies in the Plan concludes that likely significant effects can be excluded in relation to all policies presented within the submitted Plan.
- 6.20 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns on this matter. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with the relevant regulations.

Human Rights

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

Summary

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

7 The Neighbourhood Plan policies

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

The initial parts of the Plan (Parts 1-3)

- 7.8 The Plan is organised and presented in a very effective way. It makes an appropriate distinction between the policies and their supporting text. The overall format of the Plan, and the associated use of colour, maps and excellent photographs results in a very attractive and legible document. If the Plan is made, it will sit comfortably as part of the overall development plan.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.10 The Introduction (Section 1) defines the neighbourhood area (Map 1), and the Plan period (in paragraph 1.2). It also comments about the way in which the submitted Plan has been prepared. This section also comments about the Plan's Vision and objectives. The Vision provides a good summary of the overall approach as follows:

'In 2040 Wickhambrook will remain a village that has retained its distinct structure of a number of small settlements within a high-quality rural landscape, where limited sustainable growth has taken place that meets the needs of the Parish and where essential infrastructure and services are retained and improved.'
- 7.11 A key success of the approach taken is how the Plan is structured. The Introduction comments that the Plan covers seven main topic areas. In turn they form the basis for

the distinct chapters of the Plan. Each chapter contains a reminder of the relevant objectives, links to the relevant planning policy context and a summary of the relevant evidence collected during the preparation of the Plan, culminating in planning policies and, where appropriate, community aspirations. This is best practice.

- 7.12 Section 2 provides information about the neighbourhood area. It includes interesting and comprehensive details which help to set the scene for the eventual policies.
- 7.13 Section 3 comments about the planning policy context within which the Plan has been developed. It addresses both national and planning policy. The Local Plan has been adopted since the Neighbourhood Plan was prepared and submitted. I recommend later in this report that the section on the Local Plan is updated.
- 7.14 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy WHB1 – Spatial Strategy

- 7.15 This policy establishes a spatial strategy for the neighbourhood area. It focuses new development within the Housing Settlement Boundary identified in the adopted Local Plan. It comments about development proposals both inside and outside the Settlement Boundary.
- 7.16 The policy takes a very positive approach which will ensure that new development has ready access to the commercial and community facilities in the Housing Settlement Boundary. In this context I am satisfied that the approach meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Policy WHB2 – Land West of Bunters Road

- 7.17 This is an important policy in the Plan. The site to the west of Bunters Road is allocated for around 40 homes and community facilities and/or retail or local employment in the recently-adopted Local Plan (Policy AP52). That policy also advises that the types and locations of these uses within the site will be determined through the neighbourhood plan. I will examine this policy against the basic conditions in this context, and which is reinforced as the Local Plan is now adopted and therefore forms part of the development plan.
- 7.18 The policy comments about a series of development principles for the site (paragraph 5.17), and incorporates a site development framework which includes a Site Concept Drawing (Figure 6).
- 7.19 I looked at the site carefully during the visit. I saw its location in relation to the houses to the east of Bunters Road, to the group of houses to the west of Bunters Road and to the overall vehicular use of Bunters Road (A1063).
- 7.20 WSC raise a series of issues on the policy as follows:

- Planning practice guidance on neighbourhood plans is clear that policies in local plans and neighbourhood plans do not need to be duplicated;

- the neighbourhood plan policy should be removed to avoid duplication and lack of clarity and to ensure conformity with the basic conditions;
- if the policy is retained, the site area should be amended to 2.70ha to reflect the size of the site as allocated in the Local Plan
- criterion i. should be amended to read 'around 40 dwellings' to ensure flexibility.
- the appropriateness of delivering for affordable housing on the site through a Community Land Trust.

7.21 The Claydon Family also makes a series of representations about the policy and the supporting text as follows:

- the number of homes to be developed on the site;
- the relationship of development to the concept framework; and
- other detailed comments on the wording used in the supporting text.

7.22 I sought clarity from WPC on a series of issues with the policy. In its response to the clarification note, it advised that:

'while the Concept Drawing illustrated in Figure 6 does relate to the allocation in Policy AP53 of the emerging Local Plan, it is directly linked to the Neighbourhood Plan policy itself which has been prepared to be in conformity with the Local Plan, especially as Policy AP53 will become a strategic policy in the adopted Local Plan as a result of the Proposed Main Modifications required by the Local Plan Inspectors.

The practice of providing site design concepts linked to policy is common to development plan documents in West Suffolk, as is illustrated in the made Great Barton Neighbourhood Plan and the St Edmundsbury Rural Vision 2031 and Bury St Edmunds Vision 2031 Local Plan documents.

With regard to the inclusion of the Community Land Trust (CLT) preference within the policy, the Parish Council has ambitions to deliver a CLT scheme within the village. Its inclusion in a development that will provide a new community hub for Wickhambrook, facilitates affordable housing run by the community to be provided in close relationship with other Local Community uses (Use Class F), and the community open space defined in the policy. The Parish Council is of the opinion that the policy can include such a preference as there is no known requirement that community land trust housing should be delivered on "rural exception sites". The policy intent would be diminished by its inclusion in the supporting text.'

7.23 I have considered various issues very carefully. In all the circumstances, I recommend that the policy is recast and restructured to acknowledge the adoption of the Local Plan and so that it provides further details to those already included in Policy AP52 of that Plan.

7.24 WSC comment that the yield of the site should be consistent with that in the Local Plan policy (around 40 homes). I have noted WPC's strength of feeling on this issue in its response to the clarification note. Nevertheless, Planning practice guidance (ID: 41-044-20190509) advises that a neighbourhood plan should not be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial

development strategy. Whilst I am satisfied that WPC has not approached this matter with such an intention, and that the differences in the two approaches is minimal, a matter-of-fact implementation of the wording used in the neighbourhood plan policy could deliver less homes on the site than the wording used in the adopted Local Plan. Moreover, this matter is raised both by WSC and the site owners in their representations.

7.25 In this context, the recommended restructuring of the policy does not address the issue of the yield of the site given that the matter is already captured in the adopted Local Plan. I have also recommended that the yield of the site is deleted from the development principles in paragraph 5.17 of the Plan.

7.26 I have carefully considered the Plan's commentary about WPC's preference for the affordable housing on the site to be delivered through a Community Land Trust (CLT). I also note that Community Action 1 advises about the establishment of a CLT. WSC advises that

'having a Community Land Trust as the preferred mechanism of delivering affordable housing via an allocation for those with a local connection to Wickhambrook would not comply with the emerging local plan policies LP20 Affordable Housing or LP22 Housing Type and Tenure, both of which are now proposed as strategic policies in the main modifications, and for this reason it is recommended that the reference to CLT is removed,' (Examiner's Note the two policies are SP16 and SP17 in the adopted Local Plan)

7.27 In its response to this representation WPC advises that:

'the policy reflects a preference while recognising that it cannot specify a requirement for CLT. As such it represents an aspiration.'

7.28 I have considered all the information and the evidence on this matter carefully. I have given significant weight to the importance of the delivery of affordable housing on the site to be in general conformity with the strategic policies in the development plan (including Policies SP16 and 17). On the balance of the evidence, I am satisfied that the reference to a CLT should be retained in the policy. The promotion of the concept has been a natural outcome of the preparation of the neighbourhood plan and represents one of a series of potential options to deliver the affordable housing required on the site. Whilst I acknowledge that the proposed CLT is a process/delivery issue rather than a land use matter, it will assist in the proper development of the site. Nevertheless, I recommend that additional wording is added to paragraph 5.29 of the Plan to relate the outcome of a CLT to strategic policies in the development plan. I also make a consequential modification to Community Action 1 later in this report (paragraph 7.92).

7.29 I am also satisfied that the preference for delivery of the affordable housing on the site should remain in the development principles (paragraph 5.17), and the more general commentary on affordable housing elsewhere in the Plan (paragraph 5.29). This approach will provide clear and appropriate guidance for the wider development industry.

7.30 I recommend modifications to sections of the supporting text. In summary they:

- are consequential to the modifications to the policy;
- reflect the adoption of the Local Plan; and
- respond, where appropriate, to the detailed comments made by the Claydon Family.

7.31 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

‘In addition to the details in Policy AP52 of the West Suffolk Local Plan, the development of land west of Bunters Road, Wickhambrook should:

- **respond positively to the Concept Diagram (Figure 6), the Development Principles set out in this Plan, and the Wickhambrook Site Masterplan (2023);**
- **incorporate measures to manage traffic safety and speeds on Bunters Road including the provision of a safe crossing point to facilitate links to village facilities;**
- **incorporate housing proposals which provide a mix of sizes and types in accordance with the most up-to-date evidence on objectively-assessed housing needs. The amount of affordable housing provision should be in accordance with the relevant adopted Local Plan policy at the time of the planning application. Affordable homes should be designed so that they are indistinguishable from open market housing, are distributed around the site, and area not concentrated in any one area. The preferred method of delivery for the affordable housing is through a Community Land Trust; and**
- **be supported by a Landscape and Visual Impact Assessment and a Heritage Impact Assessment.**

Development proposals that include an element of self-build housing will be supported where they otherwise comply with this policy and with Policy AP52 of the West Suffolk Local Plan.’

Replace paragraph 5.17 with:

‘The following development principles shall be incorporated into the development of the site:

- *The mixed-use element of the development should be within either Town and Country Planning Use Class E or Use Class F (see Appendix 1).*
- *The mixed-use development should have a maximum gross floorspace of 450 square metres and where no single unit in Use Class E has a floorspace greater than 100 square metres unless for the provision of medical or health services.*
- *Development must have regard to the presence of the Listed Building opposite the site on Bunters Road and respond positively to its setting.*

- *Traffic calming should be provided on Bunters Road to enable a safe pedestrian crossing point to provide safe links to services in the village including the primary school and GP Surgery.*
- *Structural landscaping shall be retained and reinforced along all boundaries.*
- *A landscape buffer shall be provided around Rose and Jasmine Cottage, west of Bunters Road.*
- *A surface water drainage system (SuDs) in accordance with the standards of the Lead Local Flood Authority (Suffolk County Council) shall be provided to manage water run-off from the development and reduce flood risk on adjoining lower land.*
- *Open space should be provided along the southern edge of the site to include the potential for allotments.*
- *The opportunity to deliver the affordable housing requirement for the site through a Community Land Trust should be explored unless, at the time of the development, a Trust has not been established or would not be able to deliver the affordable housing.*

Replace paragraph 5.19 with:

‘Figure 6 identifies an area for mixed use development in accordance with Policy AP52 of the adopted Local Plan. The exact mix and viability of uses has yet to be determined but, in accordance with the Development Principles set out in paragraph 5.17, the maximum gross floorspace shall be 450 square metres and no single unit in Use Class E shall have a floorspace greater than 100 square metres unless for the provision of medical or health services. Any proposals for Class E uses over 100 square metres, should be supported by relevant details on the relationship between their size and commercial viability/deliverability.’

Replace paragraph 5.22 with:

‘The housing development should provide a mix of house sizes across all tenures, with a greater emphasis on two and three bedroomed dwellings to redress the imbalance of larger homes in the parish. Bungalows should be provided in the area closest to Bunters Road to minimise impact on the Grade II Gaines Cottage and provide choice in the housing available.’

Replace paragraph 5.23 with:

‘The vehicular access shall be solely from Bunters Road at a position to minimise light glare in residential properties on the eastern side of the road. Pedestrian and cycle links should provide safe and convenient links into and from the site to local facilities. Where practicable, pedestrian and cycle links should connect to the employment site to the west subject to any security issues being addressed.’

Replace paragraph 5.24 with: ‘Where it is both practicable and commercially viable to do so, structural landscaping should be planted before built development commences.’

At the end of paragraphs 5.29 add: 'A CLT will be configured in a way which will deliver the strategic approach captured in Policies SP16 and SP17 in the parish in general, and specifically on the Bunters Road site'

Policy WHB3 – Housing Design

- 7.32 The supporting text advises that the development of adaptable and accessible homes for all users helps to ensure that dwellings are appropriate for older persons' needs whilst still meaning that they are suitable for other types of occupiers such as first-time buyers. It also comments that the Lifetime Homes standard seeks to enable 'general needs' housing to provide, either from the outset or through simple and cost-effective adaptation, design solutions that meet the existing and changing needs of diverse households. It advises that proposals for new housing in Wickhambrook will be especially encouraged to meet the Lifetime Homes standard. The supporting text also comments about national and local standards on adaptable and accessible homes.
- 7.33 The policy comments that proposals for new dwellings should achieve appropriate internal space through compliance with the latest Nationally Described Space Standards. It also comments that dwellings should also make adequate provision for the covered storage of all wheelie bins and cycles, in accordance with the adopted cycle parking standards as set out in the Suffolk Guidance for Parking document (2023) or any successor documents. Finally, it advises that new dwellings that are designed to be adaptable to meet the needs of the increasingly aging population, without restricting the needs of younger families, will be supported,
- 7.34 The policy takes a very positive approach to these issues and has regard to Sections 5 and 8 of the NPPF. In this broader context I recommend that the title of the policy is modified so that it better captures its purpose and objectives. Otherwise, I am satisfied that the approach meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy title with: 'Housing Design Standards'

Policy WHB4 – Low Energy and Energy Efficient Housing Design

- 7.35 The policy seeks to ensure that low energy and energy efficient homes can come forward in the Plan period. The policy comments that, wherever practicable, development proposals should incorporate current best practice in energy conservation. It also advises that such measures should be incorporated so that they are integral to the building design and its curtilage and minimise any impacts on the building or its surroundings. The final section comments that as appropriate to their scale, nature and location, development proposals should demonstrate how they meet a series of technical criteria.
- 7.36 This is a good policy which has regard to Section 14 of the NPPF. In addition, it has been designed to be applied in a proportionate way. In this context I am satisfied that it meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Policy WHB5 – Employment Sites

- 7.37 The supporting text advises that the Plan seeks to protect existing employment locations to ensure that local job opportunities remain where such uses are acceptable and viable. It comments that the main employment location is at Claydon Drills south-west of Bunters Road, where agricultural machinery manufacture takes place. It also advises that other, smaller but no less important sites are located across the Parish which all contribute to supporting the local economy.
- 7.38 The policy has two related parts. The first comments that the retention and development of existing employment and other business uses will be supported providing such proposals do not have a detrimental impact on a series of matters. The second comments that proposals for non-employment or business uses that are expected to have an adverse impact on employment generation will only be permitted where one or more of a series of criteria has been met.
- 7.39 In general terms the policy takes a positive approach to these matters and has regard to Section 6 of the NPPF. I have carefully considered WSC's comments on the policy and WPC's responses. On the balance of the evidence, I am satisfied that the approach taken in the policy is consistent with Policy LP24 of the Local Plan. In a similar way I am satisfied that the supporting text's commentary about the main employment location in the parish in paragraph 6.6 is fit for purpose.
- 7.40 In this broader context, I recommend that the opening element of the second part of the policy is modified so that it provides a more explicit approach towards impacts on employment generation and uses wording appropriate to a neighbourhood plan. Otherwise, I am satisfied that the approach taken meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the opening element of the second part of the policy with: 'Proposals for non-employment or business uses that would have an adverse impact on employment generation will only be supported where one or more of the following criteria has been met:'

Policy WHB6 – New Businesses and Employment

- 7.41 The supporting text advises that some of the farms in the parish have expanded over the years with the development of large-scale barns for storage. Older traditional buildings are frequently no longer suitable for modern farming practices and lend themselves to the conversion to business use. It then advises that there may be some scope across the Parish for such conversions where the buildings are well related to the main highway network and the proposed use would not have a detrimental impact on the natural and historic environment and the amenity of nearby residents.
- 7.42 The policy has three related parts as follows:
- proposals for new, small scale business development will be supported where sites are located within the Housing Settlement Boundaries and where they

would not have an unacceptable impact on residential amenity, heritage assets and the highways network.

- associated commentary about proposals outside the Housing Settlement Boundaries
- where possible, business developments should be sited in existing buildings or on areas of previously developed land and be of a size and scale that does not adversely affect the character, highways, infrastructure, residential amenity, environment, and landscape character.

7.43 In general terms the policy takes a positive approach to these matters and has regard to Section 6 of the NPPF. I have carefully considered WSC's comments on the policy and WPC's responses. On the balance of the evidence, I am satisfied that the approach taken in the policy is consistent with Policy SP24 of the Local Plan. As such I am satisfied that the approach meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Policy WHB7 – Protecting Wickhambrook's Landscape Character

7.44 The policy is underpinned by the West Suffolk Landscape Appraisal which provides strategic guidance for managing landscape change in the area. It provides specific advice for Wickhambrook on:

- the development of agricultural buildings and infrastructure;
- farmland habitat conservation;
- settlement development; and
- green lanes.

7.45 The policy comments that proposals must demonstrate how the landscape characteristics of the site and its vicinity have been considered in preparing the scheme, having regard to the West Suffolk Landscape Assessment (2022). It also advises that as appropriate to their scale, nature, and location, and to ensure that they conserve the essential landscape, heritage and rural character of the parish, development proposals should demonstrate how they have regard to, and conserve, or enhance, the landscape character and the setting of the parish.

7.46 This is another good policy which celebrates the landscape character of the neighbourhood area. As such it has regard to Section 15 of the NPPF. In this context I recommend the following modifications to the first part of the policy to bring the clarity required by the NPPF:

- the use of wording more appropriate to a neighbourhood plan in the first part of the policy; and
- the removal of the unnecessary reference to a proportionate approach in the first part of the policy given the format and content of the second part of the policy.

7.47 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the first part of the policy with: ‘Development proposals should respond positively to the landscape characteristics of the site and its vicinity as identified in the West Suffolk Landscape Assessment (2022).’

Policy WHB8 - Biodiversity and Habitats

- 7.48 The supporting text comments that the influence of trees and hedgerows plays a significant role in determining the character of the parish. It also advises that the combined effect of screening, providing natural habitats, and the wildlife corridors that these habitats create are vitally important within the parish and the wider area and their retention and enhancement will be supported.
- 7.49 The policy reinforces national policy on biodiversity net gain. It then comments on the following three related matters:
- wherever practicable, development proposals should protect, and avoid the loss of, or substantial harm to, trees, woodlands, hedgerows and other natural features such as ponds and watercourses;
 - where new access is created, or an existing access is widened, through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity; and
 - proposals will be supported where they integrate improvements to biodiversity which will secure a measurable net gain as part of the design through a series of measures.
- 7.50 In general terms the policy takes a positive approach to biodiversity and has regard to Section 15 of the NPPF.
- 7.51 I have carefully considered the representations made by WSC on the policy and WPC’s responses to those comments. On the balance of the evidence, I recommend modifications to the second and third parts of the policy which address the mitigation hierarchy. However, I am satisfied that the first part of the policy meets the basic conditions.
- 7.52 In addition I recommend the following modifications to the policy to bring the clarity required by the NPPF:
- a minor revision to the wording used in the fourth part of the policy to reflect its intention; and
 - the inclusion of a proportionate element into the fifth part of the policy.
- 7.53 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the second and third parts of the policy with:

‘Wherever practicable, development proposals should protect, and avoid the loss of, or minimise harm to, trees, woodlands, hedgerows, and other natural

features such as ponds and watercourses. Where such losses or harm are unavoidable, and cannot be reduced through mitigation:

- i. the benefits of the development proposal must be demonstrated to clearly outweigh any impacts; and
- ii. suitable compensatory measures, that provide better replacement of the lost features will be required and contribute to the enhancement of biodiversity.

Any mitigation or compensatory measures should form an integral part of the design concept. In addition, the layout and design of the development proposal concerned should be landscape-led and appropriate in relation to its setting and context, and have regard to its ongoing management.'

Replace the fourth part of the policy with: 'Where new access is created, or an existing access is widened and affects an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the immediate locality.'

Replace the opening element of the final part of the policy with: 'As appropriate to their scale, nature and location, development proposals should incorporate improvements to biodiversity which will secure a measurable net gain as part of the design through, for example,'

Policy WHB9 - Local Green Space

- 7.54 This policy proposes the designation of twelve Local Green Spaces (LGS). The approach taken is underpinned by the details in the Local Green Space Appraisal.
- 7.55 I looked at the various proposed LGSs during the visit. I am satisfied that they meet the criteria for such designation in paragraphs 105 and 106 of the NPPF.
- 7.56 In the round, this is an excellent policy which takes the matter-of fact-approach as set out in paragraph 107 of the NPPF. I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Policy WHB10 - Buildings and Structures of Local Significance

- 7.57 The supporting text comments generally about non-designated heritage assets. It advises that a list of such buildings is not made publicly available by WSC and the Plan does not designate any such specific assets
- 7.58 The policy advises that development proposals should be designed to respect the integrity and appearance of Wickhambrook's built heritage. It also comments that valued characteristics of the parish, including buildings, structures, features and gardens of local significance, and the character and distinctiveness of the various greens, hamlets, and neighbourhoods, must be protected.

- 7.59 The policy is underpinned by Community Action 3 (Historic Assets) which advises that WPC will set up and maintain a sub-group to co-ordinate actions to conserve and protect the historic assets of the parish.
- 7.60 The linkage between the policy and the Community Action provides a context to what might otherwise be a slightly unclear policy. In effect the work associated with the Community Action will establish a schedule of Buildings and Structures of Local Significance to which the policy will apply.
- 7.61 In general terms the policy takes a positive approach to this matter and has regard to Section 16 of the NPPF. In this broader context I recommend the following modifications to the first part of the policy to bring the clarity required by the NPPF:
- subdividing it into its component elements; and
 - wording the policy so that its modified second part is clear that it refers to buildings and structures of local significance.
- 7.62 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals should be designed to respect the integrity and appearance of Wickhambrook’s built heritage. Valued characteristics of the parish, including buildings, structures, features and gardens of local significance, and the character and distinctiveness of the various greens, hamlets, and neighbourhoods, should be protected.

Proposals affecting buildings and structures of local significance will be considered in the context of their potential impact on their character and setting including their situation and location in both the immediate and wider contexts.

Proposals for any works that would lead to the loss of or substantial harm to a local heritage asset or a building of local significance should be supported by an appropriate analysis of the significance of the asset together with an explanation of the wider public benefits of the proposal.’

Policy WHB11 - Development Design Considerations

- 7.63 The supporting text comments that AECOM was commissioned to prepare Design Guidance and Codes which provides guidance that seeks to inform the design of new development to retain and protect the character and distinctiveness of Wickhambrook. The supporting text also advises that Design Guidance and Codes should be used alongside the National Model Design Codes (July 2021), or any subsequent published national as well as district level guidance.
- 7.64 The policy comments that proposals for all new development must reflect the local characteristics and circumstances of the site by creating and contributing to a high quality, safe and sustainable environment. It also advises that planning applications

should demonstrate how they satisfy the requirements of the Development Design Checklist (in Appendix 4), as appropriate to the proposal. In addition, it advises that proposals will be supported where they meet a series of design criteria.

- 7.65 This is an important policy in the Plan. It is underpinned by the Design Guidance and Codes and the Development Design Checklist. In addition, the criteria in the policy are locally-distinctive. The policy acknowledges that a proportionate approach will need to be taken given that its various design criteria will not necessarily apply to all development proposals. In the round the approach taken is a first-class response to Section 12 of the NPPF.
- 7.66 In this context I recommend that the wording used in the first sentence is modified so that it is more appropriate to a neighbourhood plan. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

In the first sentence replace ‘must’ with ‘should’

Policy WHB12- Sustainable Construction Practices

- 7.67 The supporting text comments that energy use in the construction and operation of all development is currently a major contributor to greenhouse gas emissions. It advises that minimising energy demands from development and increasing the generation of energy from renewable sources can make a significant contribution to reducing carbon emissions. The starting point for minimising energy use is to maximise energy efficiency, both in new developments and through the retrofitting of existing buildings.
- 7.68 The policy advises that proposals that incorporate current best practice in energy conservation will be supported where such measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings. It also comments that development proposals should demonstrate how they meet a series of technical matters.
- 7.69 In general terms, the policy takes a positive approach to these issues and has regard to Section 14 of the NPPF. However, in this context, I recommend that the final element of the policy is modified so that it takes a proportionate approach. This will achieve two related outcomes. The first is that it will acknowledge that domestic and minor developments may not trigger all the issues listed in the policy. The second is that it will ensure that the policy has the non-prescriptive approach required by the Written Ministerial Statement of December 2023 on Local Energy Efficiency Standards
- 7.70 Otherwise I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace ‘Development proposals should demonstrate how they:’ with ‘As appropriate to their scale, nature and location, development proposals should demonstrate how they:’

Policy WHB13 - Flooding and Sustainable Drainage

- 7.71 The supporting text advises that the main village centre is not within an Environment Agency designated flood zone, but two watercourses do flow through the parish and have associated flood zones. In this context it comments that several roads are susceptible to surface water flooding, especially Nunnery Green, Attleton Green, and Coltsfoot Green. Finally, it advises that it is essential that development proposals do not create new or exacerbate existing surface water flooding through creating surfaces where rainwater can run-off into the highway or neighbouring sites.
- 7.72 The policy is extensive. It has two key elements as follows:
- proposals for new development, or the intensification of existing development, in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment and will not be permitted, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (and any successor), and National Planning Policy Framework and the sequential test; and
 - proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site surface water drainage and water resources will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere.
- 7.73 WSC suggest detailed revision to the policy so that it more closely relates to relevant policies in the Local Plan. Such an approach would be helpful. However, it is not necessary to ensure that the Plan meets the basic conditions.
- 7.74 The policy takes a positive and comprehensive approach to flooding and sustainable drainage and has regard to Section 14 of the NPPF. In this broader context, I recommend that the wording used is modified so that it is more appropriate to a neighbourhood plan. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

In the first and second parts of the policy replace ‘permitted’ with ‘supported’

Policy WHB14 - Dark skies

- 7.75 The policy seeks to safeguard the dark skies environment of the parish.
- 7.76 The policy comments that dark skies are to be preferred over lighting while ensuring that new developments are secure in terms of occupier and vehicle safety. Any future outdoor lighting systems should have a minimum impact on the environment, minimising light pollution and adverse effects on wildlife, subject to highway safety, the needs of individuals or groups, and security. Schemes should make use of low-level downward facing lighting and reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare and light pollution.

- 7.77 In general terms, the policy responds positively to the dark skies environment of the parish and has regard to Sections 8 and 15 of the NPPF. Nevertheless, I recommend that the policy is recast so that its intentions are clear rather than commenting about a preference for dark skies. This approach will allow WSC to be able to apply the policy through the development management process. The overall direction of the policy remains unaffected.
- 7.78 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Replace the policy with:

‘Wherever practicable, development proposals should not include external lighting.

Any future outdoor lighting systems which are necessary to ensure that the development concerned is secure in terms of occupier and vehicle safety should restrict their impact on the environment, and minimise light pollution and adverse effects on wildlife. In addition, outdoor lighting systems should make use of low-level downward facing lighting and reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare.’

Policy WHB15 - Community Facilities

- 7.79 The supporting text identifies a range of important community facilities. There are two parts of the policy. The first comments about the provision and/or enhancement of facilities. The second comments about proposals which would involve the loss of community facilities
- 7.80 I looked at the identified community facilities carefully during the visit. Their importance in the parish was self-evident.
- 7.81 This is an excellent policy which highlights the importance of community facilities in the neighbourhood area. It has regard to Section 8 of the NPPF. The approach taken also acknowledges that the use and/or viability of the identified facilities may change in the Plan period. In this context I recommend that the wording used in the first sentence is modified so that it is more appropriate to a neighbourhood plan. For clarity, I also recommend that the identified community facilities are shown on the Policies Map.
- 7.82 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

In the second part of the policy replace ‘permitted’ with ‘supported’

Show the identified community facilities on the Policies Map

Policy WHB16 - Open Space, Sport, and Recreation Facilities

- 7.83 The supporting text advises that opportunities for participating in exercise are important to the health of residents and reducing pressures on the health service. It also comments that the Plan can play an important role in making sure that there are sufficient and adequate services in the village to meet the needs of current and future residents.
- 7.84 The policy advises that proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities will be permitted subject to compliance with other policies in the development plan. It also comments that development proposals which will result in the loss of existing amenity, sport or recreation open space or facilities will not be allowed unless a series of criteria are met. The policy also includes other more detailed elements.
- 7.85 In general terms the policy takes a positive approach to these matters and has regard to Sections 8 and 15 of the NPPF. In this context I recommend the following modifications to the first part of the policy to bring the clarity required by the NPPF:
- the use of wording more appropriate to a neighbourhood plan throughout the policy; and
 - the recasting of the fourth part of the policy so that it more clearly relates to the development management process.
- 7.86 Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

In the first and second parts of the policy respectively replace ‘permitted’ and ‘approved’ with ‘supported’

Replace the fourth part of the policy with: ‘Where necessary to their acceptability, development proposals for new housing, office, retail, and other commercial and mixed development should provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate. These facilities will be secured using conditions and/or planning obligations.’

In the fifth part of the policy replace the two uses of ‘must’ with ‘should’

In the sixth part of the policy replace ‘permitted’ with ‘supported’

Policy WHB17- Public Rights of Way

- 7.87 The policy comments that measures to improve and extend the existing network of public rights of way will be supported where their value as biodiversity corridors is safeguarded and any public right of way extension is fit for purpose. The policy also advises that, where practicable, development proposals should incorporate measures to enhance biodiversity within the improved or extended public right of way.

- 7.88 The policy takes a positive approach to these matters and meets the basic conditions. It will contribute to the local delivery of the social and environmental dimensions of sustainable development.

Community Actions

- 7.89 The Plan includes a series of Community Actions. They have arisen naturally as the Plan was prepared. I am satisfied that they are both appropriate and locally-distinctive.
- 7.90 The Actions are incorporated in the main part of the Plan (with the land use policies) rather than being set out in a separate part of the Plan in accordance with national policy. However, on balance, I am satisfied that the approach in the Plan is appropriate. I have reached this view for three related reasons. The first is that they add value to the land use policies on a topic-by-topic basis. The second is that they are distinguished from the land use policies using colour. The third is that the Plan properly comments about their distinction from the policies in paragraph 1.10 of the Plan.
- 7.91 The following Actions are particularly noteworthy:
- Community Land Trust (CA1);
 - Historic Assets (CA3);
 - Allotments and Community Gardens (CA5); and
 - Footpaths and Bridleways (CA7).

- 7.92 Paragraph 7.28 of this report has recommended the inclusion of additional wording in paragraph 5.29 of the Plan (in relation to Policy WHB2). I recommend a consequential modification to Community Action 1 (on the proposed promotion of a CLT).

Replace the fourth sentence of Community Action 1 with 'These homes will be maintained in perpetuity by the CLT for the benefit of local people (including village residents and/or close family members of village residents) and will provide a range of affordable living options for people at various stages of their lives - starter homes for young people; family homes; and homes for older people.'

Other Matters – General

- 7.93 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for WSC and WPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.94 WSC has raised a series of issues on the Plan. Those which relate to specific policies have been addressed earlier in the report.
- 7.95 WSC also raise a more general range of issues. In the main, they propose updates or factual corrections to the Plan. I have noted WPC's responses to the matters. In this context I recommend that the following matters are addressed/incorporated in the Plan:

General – update any references to the West Suffolk Local Plan to reflect its adoption on 15 July 2025.

Paragraph 4.7 (Figure 2)

Paragraphs 5.4 and 5.9

Paragraph 5.25

Community Action 1

Paragraphs 7.1/7.2/7.5/7.6

- 7.96 The Vision for the Plan is addressed in paragraph 7.10 of this report. I recommend that the year in the Vision is modified so that it corresponds with the Plan period.

In the Vision replace '2040' with '2041'

8 Summary and Conclusions

Summary

8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2041. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area.

8.2 Following the independent examination of the Plan, I have concluded that the Wickhambrook Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

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

Other Matters

8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as most-recently was approved on 3 April 2023.

8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses from the Parish Council to the clarification note were both detailed and informative, and West Suffolk Council managed the overall process in a very efficient manner.

Andrew Ashcroft
Independent Examiner
4 August 2025