Wickhambrook Neighbourhood Plan Parish Council response to Examiner's Clarification Note June 2025

The Neighbourhood Plan Examiner published a Clarification Note on 9 June 2025. This paper provides the Parish Council's response to the questions raised in the Note.

Policy WHB 2 – Land west of Bunter's Road

The Examiner asks if the Concept Drawing (Figure 6) in the submitted Plan has been prepared to add value and detail to Policy AP53 of the emerging Local Plan? The Examiner further asks if the reference to "the preferred method of delivery for the affordable housing is through a Community Land Trust" within the policy should be in the supporting text, given that it is not a requirement.

Parish Council response

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 and the parish council would like to refer the Examiner to the made Great Waldingfield Neighbourhood Plan¹ (Babergh District Council – October 2023) where policies GWD12 and GWD19 include a "preference" for the type of development.

¹ https://www.babergh.gov.uk/documents/d/babergh/gt_waldingfield_np_ref_version_oct23

Representations

The Examiner asks for the Parish Council's comments on, in particular, the representations from the Claydon family and those from West Suffolk Council.

Parish Council's response to representations

The table below sets out the Parish Council's response to the representations highlighted by the Examiner.

Summary Comment

Parish Council response

The Claydon family

Neither the Claydon family nor their agent responded at Regulation 14 consultation stage

Policy WHB 4 – Low Energy and Energy Efficient Housing Design
The representation seeks to amend criterion b. as follows:

b. incorporate best practice in energy conservation and are designed to achieve maximum achievable energy efficiency exceed current Building Regulations requirements;

In considering this representation it is necessary to take into account the proposed modifications to the emerging Local Plan. The proposed modification to Policy LP1, which is not a strategic policy, includes:

"All proposals for residential development are required to submit a sustainability statement that sets out what measures are proposed to address water efficiency and achieve energy efficiency. Measures that go above development plan policy requirements and building regulations standards are encouraged."

Clearly the Neighbourhood Plan should not seek to repeat the content of the Local Plan or provide different requirements unless demonstrated by evidence. In this instance, the Local Plan 'encourages' exceeding building regulations whereas the draft Neighbourhood Plan (NP) policy seeks to achieve maximum achievable energy efficiency.

The representation suggests that the NP policy would require Passivhaus standard housing or higher which is unlikely to be feasible or viable in the context of estate housing. The suggested amendment to the NP would require proposals to exceed the Building Regulations, but also does not have regard to feasibility and viability.

Summary Comment	Parish Council response
	In response, and having regard to the modifications in the Local Plan, the Examiner is asked to consider whether the following amendment would clarify the matter without losing the ambition to achieve maximum achievable energy efficiency: b. incorporate best practice in energy conservation and, where feasible and viable, are designed to achieve maximum achievable energy efficiency
Paragraph 5.17	
The representation suggests amendments to the bullet points in paragraph 5.17 as below:	
• The development should comprise no more than around 40 dwellings.	From the outset of consultations on the draft Local Plan, the Parish Council representing the vocal views of its of residents has been consistent in not supporting in excess of 40 dwellings on this site. This view remains today.
• The mixed-use development should have a maximum gross floorspace of 450 square metres. The preference is for where no single unit in Use Class E shall-to have a floorspace greater than 100 square metres unless for the provision of medical or health services. but viability and deliverability will be valid considerations when determining proposals involving units over 100 square metres.	The Parish Council does not agree with this suggestion given housing-led nature of the allocation and the need to ensure that other buildings maintain the rural character and setting of the site.
Development must have regard to the presence of the Listed Building opposite the site on Bunter's Road and not cause harm to its setting.	Given the specific heritage impact mitigation measures set out in Local Plan Policy AP53, it might be more consistent to reflect the heritage element of that Policy in this paragraph? This is a matter that can be addressed in updating the Plan post-examination without impacting on the Basic Conditions.

Summary Comment	Parish Council response
• Traffic calming must be provided on Bunter's Road and to enable a safe pedestrian crossing point to facilitate provide safe links to services in the village (including the primary school and GP Surgery) should be provided subject to the approval of the highway authority.	This amendment would not accord with the amended Policy AP53 which requires "Sustainable travel connections to existing local destinations in accordance with policy LP57, including to the primary school and doctors' surgery, nearby public rights of way and the countryside."
A development landscape buffer shall be provided around Rose and Jasmine Cottage, west of Bunters Road.	The Parish Council would support this amendment if the Examiner considered it necessary
Figure 6 – Site Concept Plan The representation suggests the arrow indicating the "surface water retention area" should point towards the south-west corner of the site.	The arrow points to a light green area and states that this area is for surface water retention and possible allotments. It is not specific in identifying where, within this area, those uses should be located.
Paragraph 5.19 The representation suggests amendments as below: Figure 6 identifies an area for mixed use development in accordance with Policy AP53 of the Draft Local Plan (January 2024). The exact mix and viability of uses has yet to be determined but, in accordance with the Development Principles, the maximum gross floorspace shall be 450 square metres and the preference is for no single unit in Use Class E shall to have a floorspace greater than 100 square metres unless for the provision of medical or health services. However, viability and deliverability will be valid considerations when determining proposals involving units over 100 square metres.	As noted in our comments to paragraph 5.17 above, the Parish Council does not agree with this suggestion given housingled nature of the allocation and the need to ensure that other buildings maintain the rural character and setting of the site.

Summary Comment

Paragraph 5.22

The representation suggests amendments as below:

The housing development makes Development of land west of Bunters Road should make provision for a mix of house sizes across all tenures to meet current housing needs, at the time of writing this would be likely to involve with a greater emphasis on two and three bedroomed dwellings to redress the imbalance of larger homes in the Parish. If they are required to meet current needs, Bbungalows should be provided in the area closest to Bunters Road in order to minimise impact on the setting of the Grade II Gaines Cottage and provide choice in the housing available.

Parish Council response

These amendments are not supported. There are no other housing allocations in Wickhambrook in the emerging Local Plan and Policy LP21 'Housing type and tenure' of the emerging Local Plan sets out an emphasis on two and three bedroomed dwellings across all tenures. Policy LP21 would become a strategic policy if the Main Modifications to the Local Plan are confirmed. In relation to the requirement for bungalows, this requirement is made not only to reflect the current local mix and the need for accessible homes but also, critically, to reflect the Local Plan need to minimise the impact on the Grade II listed Gaines Cottage.

Paragraph 5.23

The representation suggests amendments as below:

The vehicular access shall be solely from Bunters Road. Minimising at a position to minimise light glare in residential properties opposite should be considered in conjunction with other relevant factors when determining the location of the vehicular access. Pedestrian and cycle links should provide safe and convenient access to the existing footpath and road network links into and from the site to local facilities. Where feasible, this should include links to the employment site to the west subject to any security issues being addressed.

The Parish Council would support such the principle of such an amendment concerning the location of the site access in relation to headlight glare, but believes that it must be minimised rather than "considered".

The Parish Council does not support this suggestion given the requirement of Policy AP53 of the Local Plan, as proposed to be modified, which states: 'b. Sustainable travel connections to existing local destinations in accordance with policy LP57, including to the primary school and doctors' surgery, nearby public rights of way and the countryside.'

Paragraph 5.24

The Parish Council does not support this suggestion. Minimising the impact of the development on its surroundings is a high

Summary Comment	Parish Council response
The representation suggests amendments as below:	priority of the local community and strategic landscaping is a requirement of the Local Plan policy.
Where feasible and viable, structural landscaping should be planted before development commences.	
Policy WHB 2 - Land west of Bunter's Road	
The representation suggests amendments to the policy as below:	
The policy text is reproduced below with suggested amendments in blue.	
A site of 2.720 hectares west of Bunter's Road, as identified on the Policies Map, is allocated for: i up to around 40 dwellings including affordable housing, and ii up to 450 square metres gross of Commercial, Business and Service uses (Use Class E) or Local Community uses (Use Class F), as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended), and iii community open space, and iv structural landscaping.	From the outset of consultations on the draft Local Plan, the Parish Council representing the vocal views of its of residents has been consistent in not supporting in excess of 40 dwellings on this site. This view remains today.
Development of-proposals for the site should be undertaken in accordance with have regard to the Concept Diagram (Figure 6), the Development Principles set out in this Plan and the Wickhambrook Site Masterplan (2023). Development proposals should 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. Housing proposals should provide a mix of sizes and types in accordance with the most up-to-date evidence on objectively-assessed housing needs. The	The Parish Council does not support such an amendment. When the Parish Council carried out focused consultation on options for the development of the site, in March/April 2023, the Claydon family commented "we agree with you that the proposals should revert to a concept and/or high level parameters plan which establishes a clear set of parameters addressing the key development issues for the site." The Examiner is referred to Policy GB3 of the made Great Barton Neighbourhood Plan which requires development to be undertaken in accordance with the Concept Diagram and the Development Principles.

Summary Comment	Parish Council response
amount of affordable housing provision should be in accordance with the relevant adopted Local Plan policy at the time of the planning application. It should designed so that it is indistinguishable from open market housing, be distributed around the site and not concentrated in any one area. The preferred method of delivery for the affordable housing is through a Community Land Trust. Proposals that include an element of self-build housing will be	
supported. Applications must be supported by a Landscape and Visual Impact Appraisal Assessment and a Heritage Impact Assessment.	Although not clear, the Parish Council believes that representation seeks an amendment to refer to a "Landscape and Visual Impact Appraisal". This would be contrary to the Landscape Institute's 'Guidelines for Landscape and Visual Impact Assessment ' August 2024. The Institute states that the guidelines offer 'detailed guidance on the process of assessing the landscape and visual effects of developments and their significance'. Their use is not limited to use in connection with EIA as suggested.
Policy WHB12 – Sustainable Construction Practices The representation states: Policy WHB12 is an almost direct repeat of Policy WHB 4. To avoid unnecessary duplication and confusion it is suggested that policies WHB4 (amended as above) and WHB12 and their supporting paragraphs are combined (and that in the process any duplication is removed).	The Parish Council does not support this suggestion. Policy WHB4 relates to new housing whereas WHB12 relates to all development.
West Suffolk Council The District Council submitted comments at the Regulation 14 stage.	
General comments The District Council recommends that the Neighbourhood Plan is	The Parish Council acknowledges we are where we are with the forthcoming adoption of the Local Plan which was always potentially going to happen before

Summary Comment	Parish Council response
updated to take account of the "considerable weight that should be given to the emerging local plan".	the Neighbourhood Plan was made. Amendments to Local Plan references and especially, chapter 3 can be made ahead of the referendum and without impacting on the purpose of the Plan. The Examiner may wish to reference such a need in his report.
Paragraph 4.7 The District Council asks what figure 2 is trying to show and suggests a colour key would be of benefit.	The axis and labels can be added to the referendum Plan.
Policy WHB1 The District Council notes and welcomes the policy	Nothing further to add
Paragraph 5.4 The District Council refers to more up-to-date affordability data.	This can be amended should it be considered necessary
Paragraph 5.9 The District Council asks what figure 5 is trying to show and suggests a colour key would be of benefit.	The axis and labels can be added to the referendum Plan.
Paragraph 5.17 First Bullet: the District Council suggests that the number of dwellings should refer to 'around 40'	Residents have been very vocal about the number of dwellings proposed on this site and the flexibility on numbers allowed in Local Plan Policy AP53 causes significant concerns to the Parish Council given that the original "Preferred Options" local plan consultation stated that the site has an "indicative capacity of 40 dwellings". The Parish Council does not support this amendment.
Final bullet: The District Council seeks clarification to the suggestion of community land trust (CLT) delivering the affordable housing and suggests that it would usually only be delivered on exception sites.	There is no known requirement in legislation that CLT schemes should be delivered on exception sites and the Parish Council believes that if the developer agrees to the affordable housing being delivered via a CLT then this would be within planning regulations.
Paragraph 5.22	The Neighbourhood Plan does not preclude this.

Summary Comment	Parish Council response
The District Council states that the housing type and tenure should be in accordance with emerging local plan policy LP21.	
Policy WHB 2 – Land west of Bunters Road	The District Council did not request that the policy is removed at the presubmission consultation stage.
The District Council suggests that the policy should be removed as it duplicates the content of Policy AP53. If the policy is to remain then the District Council suggests that it should mirror the wording of the local plan allocation.	The Neighbourhood Plan does not duplicate the Local Plan policy but compliments it. Policy AP53, in its opening paragraph, specifically states that 'The types and locations of these uses within the site will be determined through the neighbourhood plan.' That is what Policy WHB2 seeks to achieve.
	Policy WHB2 compliments rather than repeats the local plan policy in that it:
	 specifies the types and locations of the uses identified in the local plan through criterion i, ii, and iii and includes a site concept diagram (figure 6) requires development to be undertaken in accordance with the separate Wickhambrook Site Masterplan requires the incorporation of traffic speed and safety measures on Bunters Road and a safe crossing point requires a mix of house sizes and types in accordance with the up-to-date needs supports the provision of an element of self-build housing, which the District Council supports requires a Landscape and Visual Impact Assessment to support an application.
The following additional detailed comments not addressed above are put forward:	
 the site area should be amended to 2.70 Ha criteria i should be amended to 'around 40 dwellings' 	The Parish Council supports this amendment. The Parish Council does not support this amendment.

Summary Comment	Parish Council response
 fourth paragraph – missing word 	The Parish Council supports this
'be' before 'designed'.	amendment.
Paragraph 5.25 The District Council states that the Housing Needs Survey shows a need for one, two and three bedroom properties not just two-bedroom and that this slightly contradicts paragraph 5.12	The Parish Council acknowledges that the Housing Needs Survey (February 2022) shows a need for a mix of house sizes and that, if the Examiner agrees it is necessary, the paragraph could be amended in the referendum Plan to state "predominantly" two bedroom properties.
Paragraph 5.26 The District Council suggests that references to the current adopted local plan should be updated/deleted for clarity.	The Parish Council agrees that references throughout the Plan to superseded Local Plan documents will need amending in the referendum Plan.
Paragraph 5.29 and Community Action 1 The District Council suggests that the "aspiration" for CLT housing contradicts the preference in Policy WHB2.	The Parish Council disagrees. The policy reflects a preference while recognising that it cannot specify a requirement for CLT. As such it represents an aspiration.
Community Action 1 The District Council asks whether the reference should be to Community Action 5 rather than 7?	The Parish council agrees that the reference should be to Community Action 5.
Policy WHB 3 Housing Design The District Council suggests that the title could be Housing Standards rather than Housing Design	This matter was not raised at the presubmission stage. The Parish Council disagrees with the suggestion.
Policy WHB 4 Low Energy and Energy Efficient Housing Design The District Council supports the policy	Nothing further to add.
Paragraph 6.3 The District Council suggests it would be more appropriate to refer to the emerging local plan, and policy LP37 Farm Diversification.	The amendment can be made in preparing the referendum Plan.

Summary Comment	Parish Council response
Dollar WHD E Employment sites	
Policy WHB 5 Employment sites	
The District Council questions the need for the criteria of Local Plan Policy LP36 to be repeated in WHB 5	This matter was not raised at the presubmission stage. The Parish Council is happy to defer to the Examiner on this matter but believes that the repetition assists users of the Plan rather than needing to switch between development plan documents.
The District Council suggests that the employment site in the policy is named Claydon Drills.	The Parish Council Does not support this given that the company name could be subject to change during the lifetime of the Plan. The wording in the policy and link to the Policies Map is considered clear without the need for such a change.
Policy WHB 6 New Businesses and Employment Development	The Parish Council is unclear as to what the District Council wants in the way of changes to the policy.
The District Council supports the policy but states that it should be considered alongside the emerging local plan policy LP18 (as modified) SPX Economic development and essential utilities in the countryside which, it is considered, allows more flexibility for employment uses in the countryside which could mean a conflict when decision taking.	changes to the policy.
Paragraphs 7.1 & 7.2 The District Council notes that the Glem Valley Locally Valued Landscape (SP5) will extend into the southeast corner of the parish, and this should be acknowledged within the section on Natural Environment Context.	The Parish Council is happy to amend paragraphs 7.5 & 7.6 not only to bring them up-to-date, but also to refer to the Locally Valued Landscape in (currently numbered) Policy SP5.
Paragraphs 7.5 & 7.6	As above
The District Council asks for reference to the emerging local plan policies.	
Policy WHB7 Protecting Wickhambrook's Landscape Character	Nothing further to add

Summary Comment	Parish Council response
The District Council supports the policy	
Policy WHB 8 Biodiversity and Habitats The District Council states that the second paragraph is not completely consistent with the mitigation hierarchy in the NPPF which requires that harm should be avoided or reduced through mitigation and only where this is not possible compensated. Amendments are put forward.	The Parish Council is happy for the Examiner to determine whether such suggested amendments are required in order that the policy meets the Basic Conditions.
Policy WHB 9 Local Green Spaces	Nothing further to add
The District Council supports the policy	
Policy WHB 10 Buildings and Structures of Local Significance The District Council suggests that the final sentence could be made clearer and reference is made to Local Plan Policy LP51 - Built non-designated heritage assets.	The Parish Council considers that the policy reflects the wording in Local Plan Policy LP51
Policy WHB 11 Development Design Considerations The District Council supports the policy	Nothing further to add
Policy WHB 12 Sustainable Construction Practices The District Council supports the policy	Nothing further to add
Policy WHB 13 Flooding and Sustainable Drainage The District Council recommends that reference is made to the need for a surface water drainage	The Parish Council is happy to defer the decision to the Examiner as to whether these amendments are considered necessary in order to meet the Basic Conditions. It is noted that Main Modification MM9 of the Local Plan Main

Summary Comment	Parish Council response
strategy alongside a flood risk assessment where development is proposed in flood zones 2 and 3. Reference is also made to Local Plan Policy LP5 and suggests that Policy WHB 13 should refer to the LP policy.	Modifications refers to surface water drainage strategies, but does not provide a threshold as to when such a strategy would be required. The Parish Council feels that any subsequent amendment to require a surface water drainage strategy should be reasonable and proportionate to the scale of the proposal and the site circumstances.
Policy WHB 14 Dark Skies	The Parish Council would be happy to for
The District Council states that the reference to 'preferred' in the opening sentence will be difficult to implement through the development management process.	the policy to be amended to be more positive as long as the intent is not watered down.
Policy WHB 15 Community Facilities	The Parish Council considers it appropriate
The District Council notes that the main policy criteria a-c seems to duplicate rather than add to local plan policy.	to repeat the Local Plan criteria in this instance.
They also suggest that the community facilities are labelled on the policies map for clarity.	This is a matter that can be addressed in preparing the referendum Plan.
Policy WHB 16 Open space, Sport and Recreation Facilities The District Council questions the need to repeat Policy LP33 'Open space' in the Neighbourhood Plan.	The Neighbourhood Plan identifies sites, on the Policies Map, as to which the policy applies. The removal of this policy would render those sites not being specifically protected by the Neighbourhood Plan or Local Plan.
	It is suggested that the second paragraph of the policy could be amended to refer to those facilities identified on the Policies Map.
Policy WHB 17 Public Rights of Way	Nothing further to add
The District Council welcomes the Policy.	
Appendix 2	The table does not block out sections and
The District Council states that it would be preferable to not block out sections in the summary table.	the Parish Council refers the District Council to <u>Table 1 of its own Technical</u> Advice Note which blocks out the same boxes.

Summary Comment	Parish Council response
Other responses	
Other responses Suffolk Wildlife Trust	The Wildlife Trust submitted comments at the Regulation 14 stage.
	The Parish Council has nothing further to add.
Historic England	Historic England submitted comments at the Regulation 14 stage.
	The Parish Council has nothing further to add.
Mr Edmond Mahony The comments focus primarily on	Mr Mahoney did not comment at the Regulation 14 stage.
opposing further housing development in the village	The additional housing is identified in the West Suffolk Local Plan and the Neighbourhood Plan cannot stop this.
Mr R Byers	Mr Byers commented at the Regulation 14 stage.
The comments are mainly supportive of the Plan	The Parish Council has nothing further to add.
Mrs Ann Shaw	Mrs Shaw commented at the Regulation 14 stage.
Mrs Shaw comments on a number of matters that are primarily outside the control of planning policies.	The Parish Council has nothing further to add.
Natural England	Natural England commented at the Regulation 14 stage.
The body states "Natural England does not have any specific comments on this draft neighbourhood plan."	The Parish Council has nothing further to add.
Penny Bayman	Ms Bayman did not comment at the Regulation 14 stage.
Ms Bayman comments primarily on housing proposals.	The Parish Council has nothing further to add.
Sport England	Sport England were consulted but did not comment at the Regulation 14 stage.
The body makes a number of general comments but does not	

Summary Comment	Parish Council response
specifically comment on any policies in the Plan.	The Parish Council has nothing further to add.
National Highways The body states that it has	National Highways commented at the Regulation 14 stage.
The body states that it has reviewed the plan and notes the plan area and location that is covered are remote from the A14. Consequently, the draft policies set out are unlikely to have an impact on the operation of the A14 and National Highways offers no comment.	The Parish Council has nothing further to add.