

## Consultee Comments for Planning Application DC/25/1736/HYB

This prepared response to a planning application sets out the policies and guidance referred to, an application summary, planning history and the comments of the parish council and any grounds for objection.

The Parish Council has referenced the following where relevant:

- [National Planning Policy Framework \[NPPF\]](#)
- [West Suffolk Local Plan](#)
- [Wickhambrook Neighbourhood Plan](#)

### Application Summary – West Suffolk Council

**Application No:** [DC/25/1736/HYB](#)

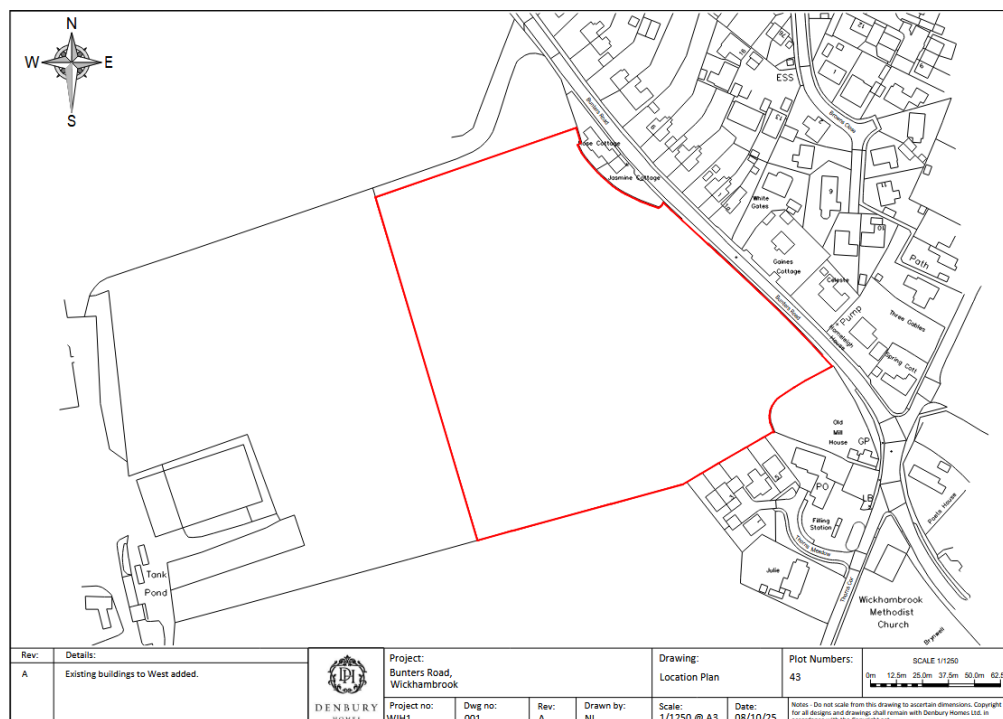
**Location:** Land Off Bunters Road Wickhambrook Suffolk

**Proposal:** Hybrid Planning application

- Planning application – 43 dwellings with access, roads, parking, garages, public open space and associated infrastructure
- Outline planning application (all matters reserved) for commercial use and associated parking (class E)

This is a new application for 43 dwellings with access, roads, parking, garages, public open space and associated infrastructure made by Mr Robert Eburne for Denbury Homes Ltd (the agent being Miss Rachael Morwood of Popham Planning Consultants)

The site (allocated by West Suffolk under its local plan as AP52) is located on Land West of Bunters Road, Wickhambrook, inside the published settlement area of [Wickhambrook \[RV3\]](#).



This is a reconsultation by West Suffolk to allow for comments on additional information supplied by the applicants (see documents posted 15<sup>th</sup> July 2026 and later, listed below:

The following documents were submitted with the [application](#)<sup>1</sup>:

- [Built Heritage Addendum](#)
- [Covering Letter from applicant](#)
- Amended – [Construction Environmental Management Plan](#)
- Amended [External Works Layout](#)
- [Drawings List](#)
- Amended [Landscape Strategy](#)
- Amended [Materials Plan](#)
- Amended [Planning Statement](#)
- Amended [Plot 1 and 14 Elevations](#)
- Amended [Plot 1 and 14 Floor Plans](#)
- Amended [Public Open Space Plan](#)
- Amended [Refuse EV and Cycles Plan](#)
- Amended [Street Scene Elevations](#)
- Amended [Site Layout Plan](#)
- [Sustainability Statement](#)

## Planning History

This is a re-consultation by West Suffolk on the proposal submitted by Denbury Homes arising from amended plans in response to comments from statutory consultees and stakeholders.

The parish council first considered this application at an extraordinary meeting on 12<sup>th</sup> December 2025 (Minute [WPC.EO.25.12.05](#) refers) and subsequently at an extraordinary meeting on 2<sup>nd</sup> July 2026 (Minute [WPC.EO.26.07.6.1](#) refers). Links to the parish council responses are highlighted for reference.

The applicant has provided a summary of changes as set out below:

1. Play area removed in favour of off-site financial contribution. Area shown with knee rail, bins and benches.
2. Footway around the southern bell mouth of site entrance removed in response to conservation officer comments regarding suburban character of junction. The footway is not required for pedestrian connectivity and this change has been confirmed as acceptable in technical discussions with SCC Highways.
3. Plot 1 and garage repositioned in response to conservation officer comments.
4. Plots 1 & 14 changed from render to brick, eaves height reduced by 300mm, roof pitch reduced and ridge height lowered by 1m in response to conservation officer comments.
5. Street elevations updated to reflect above changes.
6. Replacement hedgerow along Bunters Road increased in height and density in response to conservation officer.
7. Landscape Strategy updated to match additional street trees shown on layout in response to landscape officer.
8. Additional planting to the northernmost extent of the proposed open space in response to landscape officer

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<sup>1</sup> If you have any problem with the subsequent hyperlinks, go to: [West Suffolk Planning Portal](#) and then enter under keyword, the reference DC/25/1736/HYB. Once this has opened the hyperlinks should work.

Consultee Comments since the application was last considered in July are set out below:

- [Conservation Officer](#)
- [Ecology](#)
- [Energy and Sustainability Team](#)
- [Highways](#)
- [Landscape Officer](#)
- [Private Sector Housing and Environmental Health](#)
- [SCC Developer Contributions](#)
- [Strategic Housing](#)
- [Waste Management](#)

A summary of the consultation comments, with the applicant's response, is included in their [covering letter](#) and is attached as **Appendix A**.

### Submissions from neighbouring properties

- [Ivy Cottage](#)
- [The Beeches 1a](#) & [further comments](#)
- [49 Nunnery Green](#)

### Matters for Consideration

The following matters are relevant and should be considered with respect to the application:

1. **Settlement Hierarchy and Identity:** The proposed site is within the published settlement boundary of Wickhambrook [RV3 – Housing Settlement Boundaries]
2. **Wickhambrook Neighbourhood Plan:** The parish council should consider the application against the following statements and policies within the Wickhambrook Neighbourhood Plan ("made" by West Suffolk Council on 16<sup>th</sup> December 2025) – the vision and objectives are set out in **Appendix B**. Relevant paragraphs, policies etc. of Referendum Plan are attached as **Appendix C**, with new documents that have been submitted since the last application identified where relevant.
3. When the parish council last considered this application in July 2026, it considered that the following objectives and policies set out in the made Neighbourhood Plan had not been addressed by the applicant – this is an opportunity to review new information submitted by the applicant and the views of consultees to see whether those concerns have been addressed – namely:

- a. **Objective 3** - New housing should be located where it is safely accessible by foot to the village's services and facilities.

#### **Objectives and policies not supported by proposals**

**Policy WHB 2** – Land West of Bunters Road Highways comments may not accurately reflect the speeding issues on Bunters road as recorded by the parish VAS data collection over an extended period of time. The parish council is concerned that relying on a Road Safety Audit following planning approval may not be adequate to safeguard vulnerable children and adults crossing the road, and is seriously concerned with the impact which may arise as the commercial unit is established

- b. **Objective 7** - Natural habitats will be protected and enhanced.

#### **Proposals may not support NP objectives and policies**

**Policy WHB 8** – Biodiversity and Habitats

The application makes provision for plus 10% biodiversity net gain, and the provision of bird and bat boxes within the development. The parish council has noted that Great

Crested newts have been identified within the vicinity of the proposed development. As a protected species, this should be mitigated

- c. **Objective 8** - Wickhambrook's built heritage assets will be protected.

**NP objectives and policies not supported by proposals**

**Policy WHB 10** – Buildings and Structures of Local Significance

There is some protection around the properties of local significance and bungalows nearer the road but the parish council is concerned that there are still significant issues which need to be addressed with respect to the conservation officer's comments, particularly with respect to the likely impact of additional road signage on Gaines Cottage.

- d. **Objective 9** - High-quality and eco-friendly development will reinforce the local character of the village.

**Objectives and policies not supported by proposals (in part)**

**Policy WHB 11** – Development Design Considerations –

**Policy WHB 12** – Sustainable Construction Practices – The parish council is concerned that where air source heat pumps are installed, they should be supported by solar panels

- e. **Objective 10** - New development will not have a detrimental impact on the quality of life of existing residents

**Objectives and policies not supported by proposals**

The parish council would expect the construction management plan to be mandated as a condition by the planning authority Policy WHB 13 – Flooding and Sustainable Drainage

The parish council notes that changes have been made to mitigate this issue but wish to be reassured that this would be monitored to ensure compliance with flood authority guidance during the duration of the construction phase and post completion of the development

- f. **Objective 13** - The capacity and safety of the road network to cope with new development will be ensured.

**Objectives and policies not supported by proposals**

Capacity is not an issue but safety is on B1063. The DoT Local Transport Note L1/07 should be used to determine appropriate traffic calming measures (such as mini roundabouts, pelican crossings etc.) B1063 creates a significant barrier - footpath width and safety Highways comments may not accurately reflect the speeding issues on Bunters road as recorded by the parish VAS data collection over an extended period of time. The parish council is concerned that relying on a Road Safety Audit following planning approval may not be adequate to safeguard vulnerable children and adults crossing the road, and is seriously concerned with the impact which may arise as the commercial unit is established.

- g. **Objective 14** - The improvement of bus services to nearby towns will be encouraged.

**Objectives and policies not supported by proposals**

No provision to improve enhance bus service

- h. **Objective 15** - The Public Rights of Way network will be protected, maintained and improved

**Objectives and policies not supported by proposals**

Across the village centre, footways are sporadic in their quality and completeness although the recent development at The Meadows has provided a much-needed footway along Cemetery Road. The B1063 creates a significant barrier between the main built-up area of the village and the village stores and post office. The footpath width from Bunters road east down Shop Hill is a significant safety issue.

- 4. A Planning Intelligence Report (PAR-001765) prepared by Planning Application Review which had access to both the parish council's Neighbourhood Plan and all documents available through the planning portal, sets out the Planning Policy position and Information Gaps and Clarity Issues and is attached as Appendix D.

5. The report identifies the following outstanding matters of concern which should be resolved before the parish council could fully support the application:
  - a. Surface water routing (Anglian water objects to surface water being routed into the foul sewer)
  - b. Further information required in respect of protected species and related mitigation or licensing questions
  - c. Biodiversity net gain evidence should be clearly resolved and secured
  - d. Satisfactory mitigation through scheme details for Grade II Gaines Cottage
  - e. Highway details and securing mechanisms (detailed highway design, s.38 agreement, Road Safety Audit and s.106 contributions) to mitigate concerns of local residents about road safety and footpath width
  - f. Concerns with respect to accessibility issues for bathrooms at Plots 5 and 43 (scheme detail)



DENBURY  
HOMES

28 August 2026

Sent by email to [savannah.cobbold@westsuffolk.gov.uk](mailto:savannah.cobbold@westsuffolk.gov.uk)

Savannah Vince  
Planning Department  
West Suffolk House  
Western Way  
Bury St Edmunds  
Suffolk  
IP33 3YU

Dear Savannah

**Revised Submission**

**DC/25/1736/HYB | Hybrid planning application - a. Planning application - 43 dwellings with access, roads, parking, garages, public open space and associated infrastructure b. Outline planning application (all matters reserved) for commercial use and associated parking (class E)  
Land Off Bunters Road, Wickhambrook, Suffolk**

I am pleased to submit revised plans and details in support of our hybrid planning application at Land of Bunters Road, Wickhambrook ('the application'). This submission responds to the final outstanding matters raised by consultees.

In addition to submitting revised plans and details in response to consultation comments, I am pleased to submit a Concise Planning Statement that has been prepared in accordance with National Decision-Making Policy (NDMP) DM1 of the National Planning Policy Framework (NPPF, August 2026) to provide a concise assessment of the application. This demonstrates that the proposal is in full accordance with local and national policy criteria such that the proposal should be approved without delay in accordance with NDMP S3(1c) and S4(1).

The following plans and documents are submitted with this letter:

- Concise Planning Statement, ref: WIH1 DJ0001
- Build Heritage Assessment Addendum, ref: HER-01741
- Construction Environmental Management Plan, Abrehart Ecology Ltd, August 2026
- Reasonable Avoidance Measure (RAMS) for GCN, Abrehart Ecology Ltd, August 2026
- Document Issue Register
- Site Planning Layout, dwg no. 002 Rev E

Westley, Bury St Edmunds, Suffolk IP33 3WD

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- External Works Layout, dwg no. 003 Rev D
- Materials Plan, dwg no. 004 Rev C
- Street Elevations, dwg no. 005 Rev B
- Public Open Space Plan, dwg no. 006 Rev D
- Refuse, Bin & Cycle access, EV, Cycle Storage, dwg no. 007 Rev C
- Plots 1 & 14 Floor Plans, dwg no. 101 Rev B
- Plots 1 & 14 Elevations, dwg no. 102 Rev C
- Landscape Strategy, dwg no. ECE-1993-L-GA-100 Rev P05

I am pleased to provide below a summary of the changes made to the proposals in the current submission. I then provide a summary of consultation responses which includes an explanation as to how the changes made positively respond to the comments raised. This summary also serves to confirm that there are no other outstanding matters that should delay the Council's determination of the application.

### Summary of Changes

The key changes to the revised plans now submitted are as follows:

- Play area removed in favour of off-site financial contribution. Area shown with knee rail, bins and benches.
- Footway around the southern bell mouth of site entrance removed in response to conservation officer comments regarding suburban character of junction. The footway is not required for pedestrian connectivity and this change has been confirmed as acceptable in technical discussions with SCC Highways.
- Plot 1 and garage repositioned in response to conservation officer comments.
- Plots 1 & 14 changed from render to brick, eaves height reduced by 300mm, roof pitch reduced and ridge height lowered by 1m in response to conservation officer comments.
- Street elevations updated to reflect above changes.
- Replacement hedgerow along Bunters Road increased in height and density in response to conservation officer.
- Landscape Strategy updated to match additional street trees shown on layout in response to landscape officer.
- Additional planting to the northernmost extent of the proposed open space in response to landscape officer.

### Summary of Consultation Comments

The schedule below provides a summary of the consultation responses received to the application and how the applicant has responded to the comments received. It demonstrates that with the exception of final outstanding matters raised on ecology, landscape, heritage and from the parish council, there are no outstanding matters raised by consultees.

| Consultee                                                                                                           | Response |
|---------------------------------------------------------------------------------------------------------------------|----------|
| <b>Anglian Water – 19.12.2025:</b><br>Wickhambrook WRC and sewerage network have capacity to accommodate proposals. | Noted.   |
| <b>Arboriculture (Place Services) – 04.12.2025:</b>                                                                 |          |

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| Supports the application subject to condition requiring the submission of an Arboricultural Method Statement and Tree Protection Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Noted. We are happy to accept this condition.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Archaeology (SCC) – 27.11.2025:</b><br>No objection to the application and no archaeological mitigation required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Conservation Officer – 17.06.2026:</b><br>Comments from the Conservation Officer were received very late as we understand they were mistakenly not initially consulted. The Conservation Officer makes 5 detailed comments on design matters to reduce harm to the listed Gaines Cottage: <ol style="list-style-type: none"> <li>1. Access junction: wide gap in hedgerow and suburban in character.</li> <li>2. Plot 1: Scale and design of dwelling competes with Gaines Cottage and should be reduced.</li> <li>3. Loss of hedgerow along Bunters Road: replacement requires careful control.</li> <li>4. Site levels: No information provided on site level changes.</li> <li>5. Potential impact of additional road signage and infrastructure.</li> </ol> | <p>In response to these concerns raised, we are pleased to submit a Built Heritage Assessment Addendum prepared by Tetra Tech. This provides a description of changes made to the proposal in response to these comments as follows:</p> <p>Southern footpath to the site entrance has been removed reducing extent of hard surfaces (n.b. this change has also been requested by highways in initial S278 agreement discussions). Play area also removed in favour of off-site contribution which reduced suburban character further.</p> <p>Materiality changed from render to brick, eaves height reduced by 300mm and roof pitch and ridge height reduced by 1000mm. Plot 1 garage has been repositioned and moved further back from its access road.</p> <p>Replacement hedgerow increased in height and density. Details can be secured by condition.</p> <p>Section drawing has been updated to reflect site levels which demonstrates that the ground floor level of Plot 1 is lower than the neighbouring bungalows.</p> <p>Suitable signage will be required to accord with highway safety requirements.</p> |
| <b>Contaminated Land and Air Quality (WSC) – 02.12.2025:</b><br>Recommends condition on actions required if contamination found during construction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Noted. We are happy to accept this condition.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Developer Contributions (SCC) – 25.11.2025:</b><br>Response setting out required developer contributions to education, libraries, household waste and monitoring fees.<br><br><b>01.07.2026:</b><br>Revised response provided updated calculations in response to our request.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Response provided in letter dated 18<sup>th</sup> March 2026 accepting several of the contribution requests and requesting clarity on a couple of the education payments.</p> <p>Contributions now agreed as set out in draft S106 agreement currently being prepared.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Ecology (Place Services) – 17.02.2026:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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| <p>Temporary holding objection requesting further information on the potential impacts of the proposal on bats and great crested newts. Additional comments provided on BNG supporting the level of information provided with the application and confirming that the mandatory BNG condition should be applied to the application.</p> <p><b>Ecology (WSC) – 08.07.2026:</b><br/>Accepts logical rationale for RAMS given the area of the site to the south-west that is closest to the ponds is planned for recreation. Requests the submission of a draft RAMS prior to determination to inform a CEMP condition and compliance condition.</p>                                | <p>The layout was been amended to remove the need for works to tree T7, so a preliminary roost assessment no longer needs to be undertaken. GCN eDNA survey results submitted on 22/04/2026 that found evidence of GCN in 2 of the 4 ponds near to the site. Suitable mitigation to be put forward through Reasonable Avoidance Measures (RAMS).</p> <p>We are pleased to submit the requested RAMS statement and also a CEMP that could be subject to a compliance condition.</p> |
| <p><b>Energy and Sustainability (WSC) – 11.12.2025:</b><br/>Supports the fabric first approach to sustainability and climate resilience measures incorporated into design. Requests justification for solar PV panels not being included in the proposal, requires 110 litres per person per day water efficiency and condition requiring Building Regulations Part L / Future Homes Standard compliance.</p> <p><b>01.07.2026:</b><br/>Requests that sustainability statement is updated to include external water use within the 110 l/p/d requirement. Requests conditions requiring Building Regulations Part L / Future Homes Standard compliance and water efficiency.</p> | <p>Revised plans submitted on 13<sup>th</sup> March 2026 include solar PV panels. Sustainability statement updated to reflect this and provide water efficiency at 110 l/p/d. Response set out that it is a mandatory requirement for Building Regulations Part L to be complied with and it therefore isn't necessary to include this as a condition.</p> <p>Updated Sustainability Statement submitted 15/07/2026. The proposed conditions are noted and accepted.</p>           |
| <p><b>Highways (SCC) – 14.01.2026:</b><br/>Detailed response requesting a footway connection to existing provision along Bunters Road to the south of the site and comments on the design of the site layout.</p> <p><b>01.07.2026:</b><br/>No objection subject to conditions including the requiring the submission of details of the off-site highway improvements (i.e. footway connection along Bunters Road and uncontrolled pedestrian crossing facilities), a road safety audit of the proposed access arrangements and a construction management plan.</p>                                                                                                              | <p>A footway has been included connecting to existing provision on Bunters Road and the alignment of footways within the site have been amended.</p> <p>Noted and the proposed conditions are accepted.</p>                                                                                                                                                                                                                                                                        |
| <p><b>Landscape (Place Services) – 15.12.2025:</b><br/>Principle of development is acceptable. Requests that a play space is included in the proposal, a more robust landscape buffer to the northern and western</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Revised plans submitted on 13.03.2026 showing a play route to the north of the site, an increased landscape buffer along</p>                                                                                                                                                                                                                                                                                                                                                    |

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| <p>boundaries, the inclusion of more street trees and designing the SuDS basin to be as accessible as possible.</p> <p><b>Landscape (WSC) – 06.05.2026:</b><br/>Comment received from new internal landscape consultees reiterating many of Place Services comments regarding the need for a wider buffer, the need for a LEAP instead of a play route, street trees and basin design.</p> <p><b>Landscape (WSC) – 07.07.2026:</b><br/>Comments pleased with changes made subject to minor further changes and conditions. Following their previous the comments the Parish Council requested an off-site financial contribution to play provision instead of a play area on-site. As such, the landscape officer instead requested the installation of a knee rail fence adjacent to the site entrance and the inclusion of seating and a litter bin in this area. Comments approve of the additional street trees but recommends that the Landscape Strategy is updated to match. Recommends additional planting to the northernmost extent of the proposed open space. Requests a condition on replacement tree planting and details of tree planting.</p> | <p>the western boundary to 6m and an increase in street trees.</p> <p>Following an initial email response on 08.05.2026 to the comments received seeking clarification on points where we considered the design to be justified, a meeting was held with officers to review the comments. This provided a way forward and revised plans were submitted on 11.06.2026 changing the play route to a play area, amending the layout to further increase the number of street trees, including details of existing boundary hedgerows and showing mown paths through the basin that has shallow sloping sides.</p> <p>Requested changes made and proposed conditions accepted.</p> |
| <p><b>Lead Local Flood Authority (LLFA) – 14.01.2026:</b><br/>Holding objection requesting additional calculations and drawings to justify the drainage strategy.</p> <p><b>20.04.2026:</b><br/>Recommends approval subject to conditions.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>A technical note prepared by Ingent engineers submitted on 13.03.2026.</p> <p>Noted and the proposed conditions are accepted.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p><b>Leisure and Cultural Officer (WSC) – 27.11.2025:</b><br/>Requests for off-site contributions to play and sports provision.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Initial response on 13.03.2026 setting out that a play space was proposed on-site instead of on-site provision and detailed response to financial obligation requested provided on 18.03.2026. Further consultation with officer has led to agreement on most of the financial requests and the play area contribution following the Parish Council's request for</p>                                                                                                                                                                                                                                                                                                       |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | this to be off-site. Final contributions to be agreed through the S106 agreement.                                                                                                                                                                                                                                                                                                                    |
| <b>Planning Officer (WSC) – 19.01.26:</b><br>Comments requesting reconfiguration of parking areas, reduction in depth of turning head to south of site, removal of white cladding, changes to window hierarchy, widening structural landscaping to 6m and providing details of landscaping between the residential and employment areas at this stage.                                                                                                          | Revised plans submitted on 13 <sup>th</sup> March 2026 positively responding to all the comments received.                                                                                                                                                                                                                                                                                           |
| <b>Public Comments:</b><br>Comments have been received to the application by three local residents raising concerns regarding drainage, pedestrian accessibility, construction impact, highways and impact on wildlife and biodiversity and a lack of infrastructure in the village.                                                                                                                                                                            | Comments resolved in response to other consultation comments. Potential constructions impact to be managed through a condition requiring the approval of a Construction Method Statement.                                                                                                                                                                                                            |
| <b>Private Sector Housing and Environmental Health (WSC) – 17/12/2026:</b><br>Requests additional noise survey.                                                                                                                                                                                                                                                                                                                                                 | Noise assessment submitted on 28.04.2026 and accepted by the Council.                                                                                                                                                                                                                                                                                                                                |
| <b>Strategic Housing (WSC) – 08.12.2026:</b><br>Supports the scheme in principle as it provides policy compliant affordable housing provision.<br><br><b>06.05.2026:</b><br>Requests additional confirmation that bungalow designs meet M4(3) requirements.<br><br><b>22.06.2026:</b><br>No further comments. Supports application.                                                                                                                             | Confirmation provided that all required standards would be met and secured through the planning permission.<br><br>Revised bungalow plans submitted.<br><br>Noted.                                                                                                                                                                                                                                   |
| <b>Suffolk Fire and Rescue – 11.12.2025:</b><br>Requests condition requiring installation of fire hydrants. Responses also sets out building regulations requirements for fire access.                                                                                                                                                                                                                                                                          | Proposed condition is accepted and confirmation provided that design meets building regulations requirements.                                                                                                                                                                                                                                                                                        |
| <b>Waste Management (WSC) – 27.11.2025:</b><br>Supports application.                                                                                                                                                                                                                                                                                                                                                                                            | Noted.                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Wickhambrook Parish Council – 17.12.26:</b><br>Detailed response assessing the proposal against the objectives and policies of the Wickhambrook Neighbourhood Plan ('WNP'). The Parish Council considers that the proposal would support many of the NP's objectives and that the application accords with the original site masterplan prepared for the Neighbourhood Plan. However, they raised concerns regarding the compliance of the proposal with the | In response to the Parish Council's comments, confirmation was provided as to how the proposed housing mix meets identified needs, an additional footpath connection was provided to the south-east of the site to connect with existing provision, an updated drainage strategy was submitted in response to LLFA feedback, matters raised by the highways authority have been resolved and on-site |

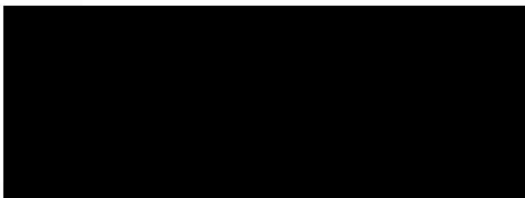
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| <p>objectives relating to housing mix, pedestrian accessibility, flood risk and drainage, play space provision and highways safety.</p> <p><b>06.07.26:</b><br/>Revised response. Some previous matters raised resolved, but still raising concerns on several points.</p> | <p>play provision has been removed in favour of making a financial contribution to existing facilities in the village. The applicant also met with the Parish Council on 02.07.26 to discuss the changes made to the proposal.</p> <p>We consider that the remaining points raised have been resolved in response to other consultee comments (e.g. great crested newts, conservation officer comments, highway safety and pedestrian accessibility). Comments on potential constructions impact can be managed through a condition requiring the approval of a Construction Method Statement.</p> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Summary and Conclusion

This revised submission responds positively to the final outstanding matters raised by consultees. It demonstrates that there are no other outstanding matters raised by consultees. The proposal is in full accordance with local and national policy criteria such that the proposal should be approved without delay in accordance with NDMP S3(1c) and S4(1).

I would be grateful if you would please reconsult relevant consultees as soon as possible and would be pleased to answer any questions you may have about the revised proposals.

Yours sincerely,



**David Jones**  
**Senior Planner**

[david.jones@denburyhomes.co.uk](mailto:david.jones@denburyhomes.co.uk)

**Wickhambrook Neighbourhood Plan****VISION**

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.

**Objectives*****Development Location***

1. New development should minimise the loss of the best quality agricultural land and its impact on the natural and historic environment as well as being well related to the existing services and facilities in the village centre.

***Housing***

2. New housing development will reflect Wickhambrook's status as a Local Service Centre within the "Settlement Hierarchy" of West Suffolk and provide a range of types, sizes, prices and tenures that meets the needs of all age groups and incomes.
3. New housing should be located where it is safely accessible by sustainable modes to the village's services and facilities.
4. Homes should incorporate measures to ensure they are accessible for all needs, incorporate energy saving features and make use of sustainable approaches to building.

***Employment and Local Economy***

5. A range of employment opportunities in the Parish will be retained and supported where there will not be a detrimental impact on the environment, services and infrastructure.

***Natural Environment***

6. The rural character of the Parish will be protected and, where possible, enhanced.
7. Natural habitats will be protected and enhanced.

***Built Environment and Design***

8. Wickhambrook's built heritage assets will be protected.
9. High-quality and eco-friendly development will reinforce the local character of the village.
10. New development will not have a detrimental impact on the quality of life of existing residents.

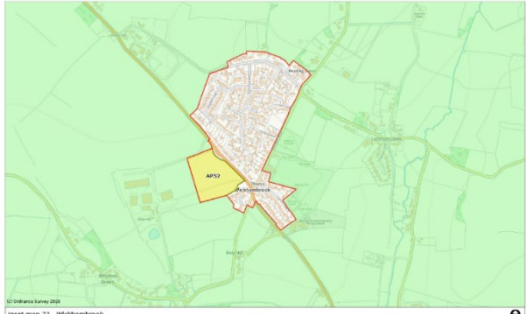
***Services and Facilities***

11. The level of services and facilities will be protected and improved.
12. The range of existing community facilities and services will be improved.

***Highways and Travel***

13. The capacity and safety of the road network to cope with new development will be ensured.
14. The improvement of bus services to nearby towns will be encouraged.
15. The Public Rights of Way network will be protected, maintained and improved

## Development Location

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4.8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The Local Plan Housing Settlement Boundary is illustrated on Map 3 and the Policies Map. In accordance with the adopted planning policies for Wickhambrook, new development will be focused within the Housing Settlement Boundary. This approach will ensure that the largely undeveloped countryside in the remainder of the Neighbourhood Area will remain preserved and the distinct settlement form is maintained. The indication of the Housing Settlement Boundary in the Neighbourhood Plan cannot preclude future local plan documents reviewing the Boundary and amending it to reflect housing allocations in that plan. |
| 4.9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Within the Housing Settlement Boundary there will remain a presumption in favour of development, but it is essential that any proposals have regard, as appropriate, to: <ul style="list-style-type: none"> <li>• the presence of heritage and natural assets;</li> <li>• the landscape setting of the village;</li> <li>• the capacity of services and infrastructure; and</li> <li>• the impact of development on designated habitats in the wider area. Policies elsewhere in the Neighbourhood Plan, as well as the Local Plan and the NPPF address such levels of detail.</li> </ul>                                           |
|  <p>Inset map 73 - Wickhambrook<br/>Scale: 1:5000<br/>Projection: 2023-06-18 13:03:14<br/>by: dave@BRIAR_DONNIN<br/>© Crown Copyright and Database rights 2023 OS 100023282<br/>West Suffolk Council<br/>West Suffolk Council<br/>Bury St Edmunds<br/>Suffolk IP11 1YU<br/>01284 763223<br/>www.westsuffolk.gov.uk</p>                                                                                                                                                                                                                                                    |  <p>Map 3 - Housing Settlement Boundary</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <h3>Policy WHB1 – Spatial Strategy</h3> <p>In the period 2023 to 2041 the Neighbourhood Plan area will accommodate development commensurate with the village’s designation as a Local Service Centre in the adopted Local Plan.</p> <p>New development will be focused within the defined Housing Settlement Boundary, as identified on the Policies Map. Proposals for housing development on infill plots or for small groups on redeveloped plots within the Housing Settlement Boundary will be supported where they do not have a detrimental impact on residential amenity, the natural and historic environment, infrastructure and highways....</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b>Consider:</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Built Heritage Addendum</a></li> <li>• <a href="#">Covering Letter from applicant</a></li> <li>• Amended <a href="#">Planning Statement</a></li> <li>• Amended <a href="#">Public Open Space Plan</a></li> <li>• Amended <a href="#">Street Scene Elevations</a></li> <li>• Amended <a href="#">Site Layout Plan</a></li> </ul>                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>• <a href="#">Highways</a></li> <li>• <a href="#">Landscape Officer</a></li> <li>• <a href="#">Strategic Housing</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

## Housing

Relevant paragraphs, policies etc. of Referendum Plan:

|                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| 5.11                             | <p>In order to inform the Parish Council's response to the Preferred Options Local Plan consultation, a focused consultation was held in April 2023 to consider two options as to how the Local Plan site might be developed. The consultation noted that any development on the site should:</p> <ul style="list-style-type: none"><li>• Minimise the impact on existing residents</li><li>• Provide a mix of house sizes, including bungalows, that meet the needs of Wickhambrook</li><li>• Preserve land along the southern edge of the site for informal open space and accommodating water run-off from the development. Allotments might also be possible in this area.</li><li>• Retain and improve the trees and hedgerows around the site to reduce the impact of the development on the wider landscape</li><li>• Provide opportunities for additional open space</li><li>• Enable the safe crossing of pedestrians over Bunters Road</li><li>• Minimise the impact of the commercial uses by reflecting a design that is typical of traditional low-rise Suffolk farmyards</li><li>• Be heavily landscaped around the edges.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Land West of Bunters Road</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 5.14                             | <p>The starting point for the consideration of this allocation is to consider how to minimise the impact of the development on existing residents, the landscape, historic buildings and local infrastructure. A separate Site Masterplan has been produced for the Neighbourhood Plan as part of the Government's neighbourhood planning support package and is available to view on the Neighbourhood Plan pages of the Parish Council's website. The site analysis in that document notes that the site "presents no obvious significant constraints to the development." It notes that:</p> <ol style="list-style-type: none"><li>1. There are a number of hedgerows across the site and trees which provide an instant landscape structure within which the development should sit. These important landscape features should be retained and enhanced, ideally by being integrated into the open space component of the development.</li><li>2. The existing three access points are unlikely to serve the development due to the proximity of the junction (southern access), the adjacency to the existing dwellings (central access) and the dedicated agricultural machinery business served by the northern access.</li><li>3. There are some existing dwellings located on Bunters Road which will require buffering and screening, while there is only one listed building in close proximity located on the other side of Bunters Road.</li><li>4. The southern part of the site has been identified for a Sustainable Drainage infrastructure (SuDs) location, thus development would be restricted in that location.</li></ol> |
| 5.15                             | <p>In addition, feedback from community engagement has identified a need for development to minimise impact on the setting of Gaines Cottage, opposite the site on Bunters Road, and long-distance views from Bunters Road.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Development Principles</b>    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 5.16                             | <p>The following development principles shall be incorporated into the development of the site:</p> <ul style="list-style-type: none"><li>• 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).</li><li>• 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.</li><li>• Development must have regard to the presence of the Listed Building opposite the site on Bunters Road and respond positively to its setting.</li><li>• Traffic calming shall 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.</li><li>• Structural landscaping shall be retained and reinforced along all boundaries.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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|                                   | <ul style="list-style-type: none"> <li>• A landscape buffer shall be provided around Rose and Jasmine Cottage, west of Bunters Road.</li> <li>• 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.</li> <li>• Open space should be provided along the southern edge of the site to include the potential for allotments.</li> <li>• 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.</li> </ul> |
| <b>Site Development Framework</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 5.17                              | <p>Figure 6 provides a Site Concept Drawing for how the site should be developed. Developers will be expected to have regard to the Site Concept Drawing in preparing proposals for the site as well as identifying how the principles will be delivered.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 5.18                              | <p>Figure 6 identifies an area for mixed use development in accordance with Policy AP52 of the 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 5.16, 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.</p>                                                                                                                                                          |
| 5.19                              | <p>Use Class F - Local Community and Learning includes for the provision of "shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres." Given that the Village Stores at Thorns Corner is currently open and operating, a proposal for a shop under this Use Class would not be supported at this time.</p>                                                                                                                                                                                                                                                                                                                                                                                |

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| 5.20 | The mixed-use development should be low rise development, having an overall height no greater than 6 metres to ridge height. Car and service vehicle parking is located so as to minimise impact on residential amenity. The development also makes provision for secure cycle parking                                                                                                                                  |
| 5.21 | The housing development makes provision for 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 in order to minimise impact on the Grade II Gaines Cottage and provide choice in the housing available                                       |
| 5.22 | 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. |
| 5.23 | Where it is both practicable and commercially viable to do so, structural landscaping should be planted before built development commences.                                                                                                                                                                                                                                                                             |

#### **Policy WHB 2 - Land west of Bunter's Road**

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 are 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.

#### **Consider:**

- [Built Heritage Addendum](#)
- [Covering Letter from applicant](#)
- Amended [Landscape Strategy](#)
- Amended [Planning Statement](#)
- Amended [Street Scene Elevations](#)
- Amended [Site Layout Plan](#)

#### Consultee Comments

- [Highways](#)
- [Landscape Officer](#)
- [Strategic Housing](#)

#### **Affordable Housing**

|      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 5.26 | The allocation at Bunters Road will be required to include a proportion of affordable housing which could be 40% of the market housing if Policy LP20 of the Draft Local Plan is confirmed. The affordable housing would be available to those registered on "Home-Link", the choice based letting scheme for all affordable housing owned by councils and other registered providers in West Suffolk and Cambridgeshire. It would not provide a preference for those that have a need or family connection requiring them to live in Wickhambrook. |
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#### **Housing Design Standards**

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|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5.31 | The NPPF states that "Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties." The March 2015 standards encourage provision of |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>enough space in homes to ensure that they can be used flexibly by a range of residents. The standards also aim to ensure that sufficient storage can be integrated into dwelling units. It is emphasised that these standards, which are set out in Appendix 2, are expressed as minimum space standards</p>                                                                                                                                                                                                                                                         |
| 5.32                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Externally, it is also important that homes meet modern day requirements for the storage of wheelie bins and cycles. Without sufficient and appropriate space reserved for these uses, the consequence can be added clutter and a deterrent in the use of cycles as a mode of travel.</p>                                                                                                                                                                                                                                                                            |
| 5.33                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Planning policies cannot influence the internal layout of dwellings but given the generally ageing population, new homes will be particularly welcomed where they meet the accessible homes standards currently set out in Part M of the Building Regulations. Part M defines three levels of housing accessibility:</p> <ul style="list-style-type: none"> <li>• Category 1: Visitable dwellings – Part M4(1);</li> <li>• Category 2: Accessible and adaptable dwellings – Part M4(2) and</li> <li>• Category 3: Wheelchair user dwellings - Part M4(3).</li> </ul> |
| 5.35                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Policy SP17 of the Local Plan requires all new homes to be built to Part M4(2) standard with around 13 percent of affordable homes to built to Part M4(3) standard, while encouraging market housing to be built to Part M4(3) standard.</p>                                                                                                                                                                                                                                                                                                                         |
| <p><b>Policy WHB 3 - Housing Design Standards</b></p> <p>Proposals for new dwellings should achieve appropriate internal space through compliance with the latest Nationally Described Space Standards. 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.</p> <p>New dwellings that are designed to be adaptable in order to meet the needs of the increasingly aging population, without restricting the needs of younger families, will be supported.</p>                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Consider:</b></p> <ul style="list-style-type: none"> <li>• Amended <a href="#">Materials Plan</a></li> <li>• Amended <a href="#">Plot 1 and 14 Elevations</a></li> <li>• Amended <a href="#">Plot 1 and 14 Floor Plans</a></li> <li>• Amended <a href="#">Refuse EV and Cycles Plan</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Energy Efficient Homes</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5.40                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Local Plan Policy SP1 addresses matters relating to the climate and environment emergency and sustainable development. It contains a number of criteria against which development proposals will be considered.</p>                                                                                                                                                                                                                                                                                                                                                  |
| <p><b>Policy WHB 4 - Low Energy and Energy Efficient Housing Design</b></p> <p>Wherever practicable, development proposals should incorporate current best practice in energy conservation. 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. As appropriate to their scale, nature and location, development proposals should demonstrate how they:</p> <ol style="list-style-type: none"> <li>maximise the benefits of solar gain in site layouts and orientation of buildings; and</li> <li>incorporate best practice in energy conservation and are designed to achieve maximum achievable energy efficiency; and</li> <li>avoid fossil fuel-based heating systems; and</li> <li>incorporate sustainable design and construction measures to improve energy and water efficiency including, where feasible, ground/air source heat pumps, solar panels and grey water recycling, rainwater and stormwater harvesting</li> </ol> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Consider:</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Sustainability Statement</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>Consultee Comments:</p> <ul style="list-style-type: none"> <li>• <a href="#">Energy and Sustainability Team</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

## Employment and Local Economy

Relevant paragraphs, policies etc. of Referendum Plan:

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| 6.6                                                                                                                                                                                                                                                                                                                                                                                   | <p>The creation of additional jobs in Wickhambrook will be supported where the proposal is compatible with the village's designation as a Local Service Centre and where the jobs are local in nature and would not result in significant in-commuting from other settlements and would not have a detrimental impact on:</p> <ul style="list-style-type: none"> <li>• the character of the area,</li> <li>• the local road network and the amenity of residents living near the site or on the access route to it, and</li> <li>• identified important views.</li> </ul> <p>It is envisaged that employment premises on new sites would remain small in terms of the size of the premises and the number of people employed on the site. Major development on new employment sites would not be appropriate in the Parish as more sustainable locations exist in larger settlements such as Bury St Edmunds, Haverhill and Newmarket where local access by sustainable travel modes such as buses, walking and cycling can be readily achieved and the potential for detrimental impact on the landscape character of the area reduced</p> |
| <p><b>Policy WHB 6 - New Businesses and Employment Development</b></p> <p>Proposals for new, small scale business development will be supported where sites are located within the Housing Settlement Boundaries identified on the Policies Map and where they would not have an unacceptable impact on residential amenity, heritage assets and the highways network.</p> <p>...</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><b>Note – this element is all matters reserved</b></p>                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

## Natural Environment

Relevant paragraphs, policies etc. of Referendum Plan:

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| 7.5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The Local Plan contains seven policies on the natural environment which are of relevance to the Neighbourhood Area, namely:</p> <ul style="list-style-type: none"> <li>• Policy SP5 Green infrastructure</li> <li>• Policy SP6 Locally valued landscapes</li> <li>• Policy SP7 Landscape</li> <li>• Policy SP8 Biodiversity net gain and enhancements</li> <li>• Policy SP9 Protected sites, habitats and features</li> <li>• Policy LP12 Trees</li> <li>• Policy LP13 Protected species</li> </ul> |
| <p><b>Wickhambrook's Landscape</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 7.7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The West Suffolk Landscape Appraisal provides strategic guidance for managing landscape change in the area. Summarised and as relevant to Wickhambrook, it recommends:</p> <p>Development of agricultural buildings and infrastructure</p> <p>Farmland habitat conservation</p> <p>Settlement development</p> <p>Green lanes</p>                                                                                                                                                                    |
| <p><b>Policy WHB 7 - Protecting Wickhambrook's Landscape Character</b></p> <p>Development proposals should respond positively to the landscape characteristics of the site and its vicinity as identified in the West Suffolk Landscape Assessment (2022).</p> <p>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.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><b>Consider:</b></p> <ul style="list-style-type: none"> <li>• <a href="#">Built Heritage Addendum</a></li> <li>• Amended <a href="#">Landscape Strategy</a></li> <li>• Amended <a href="#">Public Open Space Plan</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                | <p>Consultee Comments</p> <ul style="list-style-type: none"> <li>• <a href="#">Conservation Officer</a></li> <li>• <a href="#">Landscape Officer</a></li> <li>• </li> </ul>                                                                                                                                                                                                                                                                                                                            |

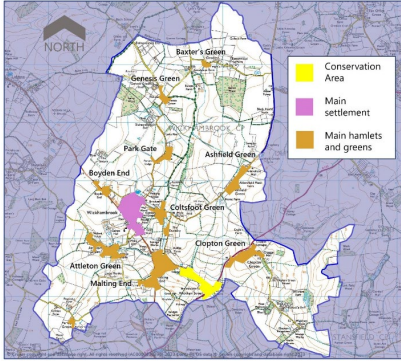
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| <ul style="list-style-type: none"> <li>• Amended <a href="#">Plot 1 and 14 Elevations</a></li> <li>• Amended <a href="#">Plot 1 and 14 Floor Plans</a></li> <li>• </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Habitats</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 7.9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Across the Parish the influence of trees and hedgerows plays a significant role in determining the character of the area. 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.                                                                                                                                                                                                                                                         |
| 7.10                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Currently the NPPF encourages net gains for biodiversity to be sought through planning policies and decisions. The 2021 Environment Act introduced a statutory requirement for all appropriate developments to deliver a minimum 10 per cent measurable net gain in biodiversity, measured by using a statutory metric and biodiversity statement to be submitted with planning applications. Strategic Policy SP8 of the Local Plan addresses the requirements for biodiversity net gain in relation to qualifying development proposals and it is not necessary to repeat the requirements in the Neighbourhood Plan. |
| 7.11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | There may be occasions where a new access to an otherwise acceptable development site would result in the loss of part of an existing hedgerow. Where this is necessary, a new hedgerow should be planted using native species of a local provenance at the rear of the visibility splay returns to minimise the loss of hedgerow and habitat and maintain the character of the area                                                                                                                                                                                                                                    |
| <p><b>Policy WHB 8 - Biodiversity and Habitats</b></p> <p>Qualifying development proposals are required to achieve a measurable biodiversity net gain of at least 10 percent, calculated using the statutory biodiversity metric.</p> <p>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:</p> <ul style="list-style-type: none"> <li>i. the benefits of the development proposal must be demonstrated to clearly outweigh any impacts; and</li> <li>ii. suitable compensatory measures, that provide better replacement of the lost features will be required and contribute to the enhancement of biodiversity.</li> </ul> <p>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. 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.</p> <p>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,</p> <ul style="list-style-type: none"> <li>a) the creation of new natural habitats including ponds;</li> <li>b) the planting of additional native trees and hedgerows (reflecting the character of Wickhambrook's traditional trees and hedgerows);</li> <li>c) restoring and repairing fragmented wildlife networks, for example, including swift-boxes, bat boxes and holes in fences which allow access for hedgehogs</li> </ul> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Consider:</b></p> <p>Consultee Comments</p> <ul style="list-style-type: none"> <li>• <a href="#">Ecology</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

## Built Environment and Design

Relevant paragraphs, policies etc. of Referendum Plan:

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 8.3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | The NPPF notes that heritage assets (see Glossary) “are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.” The NPPF also makes it clear, in paragraph 131, that ‘good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.’...                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 8.4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | The Local Plan contains strategic Policy SP1 covering the climate and environment emergency and sustainable development, Policy SP2 Flood risk and sustainable drainage, Policy SP4 covering Design and Policy, SP30 covering the historic environment. In addition, the following policies are of specific relevance to the built environment and design: <ul style="list-style-type: none"> <li>• Policy LP1 – Sustainable design and construction</li> <li>• Policy LP3 – Electric vehicle charging points in new developments</li> <li>• Policy LP4 – Reducing waste and the circular economy</li> <li>• Policy LP5 – Water quality and resources</li> <li>• Policy LP6 – Renewable and low carbon energy</li> <li>• Policy LP9 – Well-designed places</li> <li>• Policy LP35 – Listed buildings</li> <li>• Policy LP36 – Built non-designated heritage assets</li> <li>• Policy LP37 – Conservation areas</li> </ul> |
| <b>Built Heritage</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 8.8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | National and local plan policy is already in place and sufficient to deal with planning applications that affect designated heritage assets (listed buildings, the conservation area, scheduled monuments or archaeological records).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8.9                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | National planning practice guidance identifies that buildings, monuments, sites, places, areas or landscapes can have a degree of heritage significance that merit consideration in planning decisions, but which do not meet the criteria for designating as heritage assets. Known as “non-designated heritage assets”, many local planning authorities identify and publish lists of these assets and the preparation of neighbourhood plans can also enable such assets to be identified. Such a list is not made publicly available by West Suffolk Council and the Neighbourhood Plan does not designate any such specific assets                                                                                                                                                                                                                                                                                   |
| <b>Policy WHB 10 - Buildings and Structures of Local Significance</b><br>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.<br>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.<br>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 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Consider:</b> <ul style="list-style-type: none"> <li>• <a href="#">Built Heritage Addendum</a></li> <li>• <a href="#">Covering Letter from applicant</a></li> <li>• Amended <a href="#">Landscape Strategy</a></li> <li>• Amended <a href="#">Materials Plan</a></li> <li>• Amended <a href="#">Planning Statement</a></li> <li>• Amended <a href="#">Plot 1 and 14 Elevations</a></li> <li>• Amended <a href="#">Plot 1 and 14 Floor Plans</a></li> <li>• Amended Street Scene Elevations</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Consultee Comments <ul style="list-style-type: none"> <li>• <a href="#">Conservation Officer</a></li> <li>• <a href="#">Landscape Officer</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

## Development Design

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| 8.10 | <p>In 2022, as part of the Government's neighbourhood planning support programme, AECOM were commissioned to prepare Design Guidance and Codes for the Neighbourhood Plan Area on behalf of the Parish Council. The document, published separately on the Neighbourhood Plan pages of the Parish Council's website, provides guidance that seeks to inform the design of new development in order to retain and protect the character and distinctiveness of Wickhambrook. The Design Guidance and Codes should be used alongside the National Model Design Codes published by the Government in July 2021, or any subsequent published national as well as district level guidance</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8.11 | <p>The Design Guidance and Codes identified three distinct character areas, as illustrated on Map 6</p>  <p>Map 6 - Design Guidance Parish Character Areas</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 8.12 | <p>For each of the character area typologies, the existing and proposed characteristics are described...</p> <p><b>Main Settlement Area</b></p> <p>Existing characteristics:</p> <ul style="list-style-type: none"> <li>• This is the most concentrated area of the village and location of local amenities including the doctors surgery and school.</li> <li>• Cul-de-sac development is the most prominent form of development in this area.</li> <li>• There is a consistent set-back building line with small to medium sized front gardens.</li> <li>• There is use of informal green spaces throughout the settlement and low lying vegetation and landscaping including green verges and hedges.</li> <li>• Bungalows are common in this area along with some semi-detached and council housing.</li> <li>• There is a mix of 1 to 2 storey houses.</li> </ul> <p>Proposed characteristics:</p> <ul style="list-style-type: none"> <li>• Use the local material and colour palette in any new developments and avoid concentration of single typologies such as the bungalows in Nunnery Green.</li> <li>• Avoid proposing cul-de-sacs which reduced connectivity in the village.</li> <li>• The car parking issues can be benefited with a form of traffic management/enforcement and all proposed development should incorporated on plot parking to reduce on-street parking in this area.</li> <li>• Heights should be in keeping with Wickhambrook's character and existing buildings and should not exceed 2 storeys.</li> <li>• Design variety of architectural styles with various materials which all should be in keeping with Wickhambrook's character to avoid monotonous design appearance.</li> </ul> |
| 8.13 | <p>The Design Guidance and Codes work in tandem with the Neighbourhood Plan to provide guidance on the built form, layout and sustainability of development, which must be designed and constructed to perform to increasingly low-carbon requirements set by central and local government. It also contains general design guidelines to which new development will be expected to have regard. These are reproduced below.</p> <ol style="list-style-type: none"> <li>1. Integrate with existing paths, streets, circulation networks and patterns of activity;</li> <li>2. Reinforce or enhance the established settlement character of streets, greens, and other spaces;</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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|  | <ol style="list-style-type: none"> <li>3. Harmonise and enhance existing settlement in terms of physical form, architecture and land use;</li> <li>4. Relate well to local topography and landscape features, including prominent ridge lines and long-distance views;</li> <li>5. Reflect, respect, and reinforce local architecture and historic distinctiveness;</li> <li>6. Retain and incorporate important existing features into the development;</li> <li>7. Respect surrounding buildings in terms of scale, height, form and massing;</li> <li>8. Adopt contextually appropriate materials and details;</li> <li>9. Provide adequate open space for the development in terms of both quantity and quality;</li> <li>10. Incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features;</li> <li>11. Ensure all components e.g. buildings, landscapes, access routes, parking and open space are well related to each other;</li> <li>12. Positively integrate energy efficient technologies;</li> <li>13. Make sufficient provision for sustainable waste management (including facilities for kerbside collection, waste separation, and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours;</li> <li>14. Ensure that places are designed with management, maintenance and the upkeep of utilities in mind; and</li> <li>15. Seek to implement passive environmental design principles by, firstly, considering how the site layout can optimise beneficial solar gain and reduce energy demands (e.g. insulation), before specification of energy efficient building services and finally incorporate renewable energy sources.</li> </ol> |
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#### **Policy WHB 11 - Development Design Considerations**

Proposals for all new development should reflect the local characteristics and circumstances of the site by creating and contributing to a high quality, safe and sustainable environment. Planning applications should demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix 4 of this Plan (See appendix A), as appropriate to the proposal. In addition, proposals will be supported where they:

- a) recognise and address the key architectural features, characteristics, landscape/building character, local distinctiveness and special qualities of the area and, where necessary, prepare a landscape character appraisal to demonstrate this;
- b) maintain the village's sense of place and/or local character, as identified in the Wickhambrook Design Guidance and Codes;
- c) do not involve the loss of gardens, important open, green or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;
- d) taking mitigation measures into account, do not affect adversely and, where appropriate enhance:
  - i. any historic, architectural or archaeological heritage assets of the site and its surroundings;
  - ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features;
  - iii. sites, habitats, species and features with biodiversity and ecological interest;
  - iv. the residential amenity of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated;
- e) do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;
- f) produce designs that respect the character, scale and density of the locality;
- g) include tree-lined streets unless in specific cases there are clear, justifiable and compelling reasons why this would be inappropriate and include trees elsewhere within developments where the opportunity arises;

- h) produce designs, in accordance with adopted standards, that maintain or enhance the safety of the highway network, ensuring that all residents' vehicle parking is provided within the plot and that spaces and garages meet the adopted minimum size standards;
- i) seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement, in accordance with the Suffolk Design Streets Guide (or any successor documents);
- j) wherever possible ensure that development faces onto existing roads;
- k) do not result in water run-off that would add to or create surface water flooding by including, as necessary, water features such as ponds, wetlands and streams etc to collect run off to alleviate the possibility of flooding on lower lying land;
- l) where appropriate, make adequate provision for the covered storage of all wheelie bins and cycle storage in accordance with adopted cycle parking standards.

**Consider:**

- [Covering Letter from applicant](#)
- Amended – [Construction Environmental Management Plan](#)
- Amended [External Works Layout](#)
- Amended [Landscape Strategy](#)
- Amended [Site Layout Plan](#)
- 

**Consultee Comments**

- [Conservation Officer](#)
- [Highways](#)
- [Landscape Officer](#)
- [Strategic Housing](#)
- [Waste Management](#)

**Climate Change**

- 8.16 Where energy use is necessary, then priority should be given to utilising the most sustainable sources. ... There may be occasions where schemes that do require planning permission could have a potential adverse impact on the character of the area and the amenity of nearby residents. The Neighbourhood Plan has limited powers to require developments to meet energy saving standards, especially in the construction of new homes. However, that does not stop the encouragement of the incorporation of measures in development that meet the energy hierarchy (in order of preference) of:
1. Minimising energy demand;
  2. Maximising energy efficiency;
  3. Utilising renewable energy;
  4. Utilising low carbon energy; and
  5. Utilising other energy sources

**Policy WHB 12 - Sustainable Construction Practices**

For all appropriate development, 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. As appropriate to their scale, nature and location, development proposals should demonstrate how they:

- a) maximise the benefits of solar gain in site layouts and orientation of buildings;
- b) incorporate best practice in energy conservation and are designed to achieve maximum achievable energy efficiency;
- c) avoid fossil fuel-based heating systems;
- d) incorporate current sustainable design and construction measures and renewable energy measures, such as, where feasible, ground/air source heat pumps, solar panels, thermal and PV systems; and
- e) make provision for grey water/rainwater, and/or surface water harvesting and recycling

**Consider:**

- [Covering Letter from applicant](#)
- Amended – [Construction Environmental Management Plan](#)
- Amended [Planning Statement](#)
- [Sustainability Statement](#)

**Consultee Comments**

- [Energy and Sustainability Team](#)

### **Flooding and Sustainable Drainage**

- 8.18 A number of roads are susceptible to surface water flooding, especially Nunnery Green, Attleton Green and Coltsfoot Green. 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. New development will be required, where appropriate, to make provision for the attenuation and recycling of surface water and rainwater through Sustainable Drainage Systems (SuDS) that might include on-site rainwater and stormwater harvesting and greywater recycling, and the management of run-off and water management in order to reduce the potential for making the situation worse.

### **Policy WHB 13 - Flooding and Sustainable Drainage**

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 supported, 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. 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. Development will only be supported where it has an acceptably low risk of being affected by flooding when assessed through sequential testing against the most up-to-date (SFRA) maps. Environment Agency flood risk maps and the West Suffolk Strategic Flood Risk Assessment. Additionally, development should be safe for its lifetime and not increase flow rate compared to a greenfield scenario, and where possible reduce flood risk overall. Protection of the surrounding watercourses is necessary to decrease the likelihood of increasing the flood risk of Wickhambrook in the future. Proposals should, as appropriate, include the use of above-ground open Sustainable Drainage Systems (SuDS). These could include:

- wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/ recreational areas, and biodiversity benefits; and
- rainwater and stormwater harvesting and recycling; and other natural drainage systems where easily accessible maintenance can be achieved.

#### **Consider:**

- [Drainage Strategy](#)
  - Flood Risk Assessment (parts [1](#), [2](#) and [3](#))
  - [Landscaping Strategy](#)
  - [SUDS Proforma](#)
- Only the landscaping strategy has been updated.

#### **Consultee Comments**

- [Anglian Water](#)
- [SCC Floods and Water](#) and [further comments](#)

### **Light Pollution**

- 8.19 Paragraph 186 (c) of the NPPF states that planning policies and decisions should "limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation". Artificial lighting of development, while increasing a sense of security, can also impact upon residential amenity, the character and appearance of an area (particularly rural locations) and the environment. Aspects such as poor design, location or the expulsion of unnecessarily high levels of light can also have a harmful impact.

### **Policy WHB 14 - Dark skies**

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 and light pollution.

## Services and Facilities

Relevant paragraphs, policies etc. of Referendum Plan:

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9.3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Paragraph 88 of the NPPF states that planning policies and decisions should enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. Further, paragraph 93 states that planning policies and decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs                                                                                                                                                                                                                                                                                                                                                                                                        |
| 9.4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The Local Plan includes the following policies in relation to village services and facilities: <ul style="list-style-type: none"> <li>• Policy LP19 Community facilities and services</li> <li>• Policy LP20 Leisure and cultural facilities</li> <li>• Policy LP21 Open space, sport, play and recreation facilities</li> <li>• Policy LP22 Allotments</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 9.8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Opportunities for participating in exercise are important to the health of residents and reducing pressures on the health service. The Neighbourhood 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. The village playing field to the rear of the Village Hall provides a central facility for both formal and informal recreation. Adjoining, but separate from the playing field are the Bowls Club and tennis courts. As the population of the Parish grows, there may be a demand for further facilities, either an expansion of the existing or totally new provision. However, it is also important to safeguard what we already have and, in accordance with Policies LP20, LP21 and LP22 of the Local Plan, existing facilities will be protected from being lost unless there are demonstrable reasons for their loss. |
| <b>Policy WHB 16 - Open Space, Sport and Recreation Facilities</b><br>Proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities will be supported subject to compliance with other Policies in the Development Plan...                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Community Action 5 - Allotments and Community Gardens</b><br>The Parish Council will work with developers and parishioners to explore options for providing family allotments or community growing spaces in the village.<br>Future provision for vegetable, fruit and flower growing and general gardening might include: <ul style="list-style-type: none"> <li>• spaces allocated to individuals and families</li> <li>• spaces gardened by community groups.</li> </ul> In consultation with parishioners and in partnership with developers, the Parish Council may also decide to set aside spaces for community use as play areas, wildlife zones, enhanced landscapes and places for relaxation and leisure. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Consider:</b> <ul style="list-style-type: none"> <li>• Amended <a href="#">External Works Layout</a></li> <li>• Amended <a href="#">Landscape Strategy</a></li> <li>• Amended <a href="#">Public Open Space Plan</a></li> <li>• Amended <a href="#">Site Layout Plan</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                  | Consultee Comments <ul style="list-style-type: none"> <li>• <a href="#">Landscape Officer</a></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

## Highways and Travel

Relevant paragraphs, policies etc. of Neighbourhood Plan:

| 10.1                                                                                                                                                                                                                                                                                                                                                                                                                | Neighbourhood plans have little power to introduce highway improvements as most schemes will not require planning permission. Improvements are therefore reliant on Suffolk County Council, as the highways authority, for investment in projects or improvements required as part of the mitigation of the impact of development proposals                                                                                                                                                                                                 |           |                    |                                                                                              |                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|--------------------|----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| 10.7                                                                                                                                                                                                                                                                                                                                                                                                                | The NPPF seeks to promote sustainable transport through reducing the impacts of development on transport networks and promoting walking, cycling and public transport. At a local level, the Local Plan includes the following policies in relation to highways and travel: <ul style="list-style-type: none"> <li>• Policy LP41 Active and sustainable travel</li> <li>• Policy LP42 Rights of way</li> <li>• Policy LP43 Transport assessments, transport statements and travel plans</li> <li>• Policy LP44 Parking standards</li> </ul> |           |                    |                                                                                              |                                                                              |
| 10.10                                                                                                                                                                                                                                                                                                                                                                                                               | Although not a problem in Wickhambrook, it is important to take opportunities to improve air quality and mitigate any risk to human health due to man-made emissions such as nitrogen oxides and particulate matter. Development proposals should seek to encourage and facilitate active and sustainable travel to reduce vehicles on the road and therefore pollution and poor air quality, as well as improve mental and physical health.                                                                                                |           |                    |                                                                                              |                                                                              |
| 10.11                                                                                                                                                                                                                                                                                                                                                                                                               | Public rights of way provide opportunities for recreational walking, horse riding and cycling. Where feasible, improvements to the quality and extent of the public rights of way network will be supported where provided as part of development proposals                                                                                                                                                                                                                                                                                 |           |                    |                                                                                              |                                                                              |
| <b>Policy WHB 17 - Public Rights of Way</b><br>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. Where practicable, development proposals should incorporate measures to enhance biodiversity within the improved or extended public right of way. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |           |                    |                                                                                              |                                                                              |
| <table border="1"> <thead> <tr> <th>Consider:</th><th>Consultee comments</th></tr> </thead> <tbody> <tr> <td> <ul style="list-style-type: none"> <li>• Amended <a href="#">Site Layout Plan</a></li> </ul> </td><td> <ul style="list-style-type: none"> <li>• <a href="#">Highways</a></li> </ul> </td></tr> </tbody> </table>                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Consider: | Consultee comments | <ul style="list-style-type: none"> <li>• Amended <a href="#">Site Layout Plan</a></li> </ul> | <ul style="list-style-type: none"> <li>• <a href="#">Highways</a></li> </ul> |
| Consider:                                                                                                                                                                                                                                                                                                                                                                                                           | Consultee comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |           |                    |                                                                                              |                                                                              |
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### Action:

Using the pro-forma template, consider where the planning application meets and/or departs from the Wickhambrook Neighbourhood Plan objectives, and identify where the planning application departs from the NP Policies identified above.

**Street grid and layout:**

- Does it favour accessibility and connectivity? If not, why?
- Do the new points of access and street layout have regard for all users of the development; in particular pedestrians, cyclists and those with disabilities?
- What are the essential characteristics of the existing street pattern; are these reflected in the proposal?
- How will the new design or extension integrate with the existing street arrangement?
- Are the new points of access appropriate in terms of patterns of movement?
- Do the points of access conform to the statutory technical requirements?

**Local green spaces, views & character:**

- What are the particular characteristics of this area which have been taken into account in the design; i.e. what are the landscape qualities of the area?
- Does the proposal maintain or enhance any identified views or views in general?
- How does the proposal affect the trees on or adjacent to the site?
- Can trees be used to provide natural shading from unwanted solar gain? i.e. deciduous trees can limit solar gains in summer, while maximising them in winter.
- Has the proposal been considered within its wider physical context?
- Has the impact on the landscape quality of the area been taken into account?
- In rural locations, has the impact of the development on the tranquillity of the area been fully considered?
- How does the proposal impact on existing views which are important to the area and how are these views incorporated in the design?
- How does the proposal impact on existing views which are important to the area and how are these views incorporated in the design?
- Can any new views be created?
- Is there adequate amenity space for the development?
- Does the new development respect and enhance existing amenity space?
- Have opportunities for enhancing existing amenity spaces been explored?
- Will any communal amenity space be created? If so, how will this be used by the new owners and how will it be managed?
- Is there opportunity to increase the local area biodiversity?
- Can green space be used for natural flood prevention eg permeable landscaping swales etc?
- Can water bodies be used to provide evaporative cooling?
- Is there space to consider a ground source heat pump array, either horizontal ground loop or borehole (if excavation is required)?

**Gateway and access features:**

- What is the arrival point, how is it designed?
- Does the proposal maintain or enhance the existing gaps between settlements?
- Does the proposal affect or change the setting of a listed building or listed landscape?
- Is the landscaping to be hard or soft?

**Buildings layout and grouping:**

- What are the typical groupings of buildings?
- How have the existing groupings been reflected in the proposal?
- Are proposed groups of buildings offering variety and texture to the context of the village?
- What effect would the proposal have on the streetscape?
- Does the proposal maintain the character of dwelling clusters stemming from the main road?
- Does the proposal overlook any adjacent properties or gardens? How is this mitigated?
- Subject to topography and the clustering of existing buildings, are new buildings oriented to incorporate passive solar design principles?
- If any of the buildings were to be heated by an individual air source heat pump (ASHP), is there space to site it within the property boundary without infringing on noise and visual requirements?
- Can buildings with complementary energy profiles be clustered together such that a communal low carbon energy source could be used to supply multiple buildings that might require energy at different times of day or night to reduce peak loads? And/or
- can waste heat from one building be extracted to provide cooling to that building as well as heat to another building?

**Building line and boundary treatment:**

- What are the characteristics of the building line?
- How has the building line been respected in the proposals?
- Has the appropriateness of the boundary treatment been considered in the context of the site?

#### **Building heights and roofline:**

- What are the characteristics of the roofline?
- Have the proposals paid careful attention to height, form, massing and scale?
- If a higher than average building(s) is proposed, what would be the reason for making the development higher?
- Will the roof structure be capable of supporting a photovoltaic or solar thermal array either now or in the future?
- Will the inclusion of roof mounted renewable technologies be an issue from a visual or planning perspective? If so can they be screened from view being careful not to cause over shading?

#### **Household extensions: - Not applicable**

#### **Building materials and surface treatment:**

- What is the distinctive material in the area?
- Does the proposed material harmonise with the local materials?
- Does the proposal use high-quality materials?
- Have the details of the windows, doors, eaves and roof details been addressed in the context of the overall design?
- Does the new proposed materials respect or enhance the existing area or adversely change its character?
- Are recycled materials, or those with high recycled content proposed?
- Has the embodied carbon of the materials been considered and are there options which can reduce the embodied carbon of the design? For example, wood structures and concrete alternatives.
- Can the proposed materials be locally and/or responsibly sourced? E.g. FSC timber, or certified under BES 6001, ISO 14001 Environmental Management Systems?

#### **Car parking:**

- What parking solutions have been considered?
- Are the car spaces located and arranged in a way that is not dominant or detrimental to the sense of place?
- Has planting been considered to soften the presence of cars?
- Does the proposed car parking compromise the amenity of adjoining properties?
- Have the needs of wheelchair users been considered?
- Can electric vehicle charging points be provided?
- Can secure cycle storage be provided at an individual building level or through a central/communal facility where appropriate?
- If covered car ports or cycle storage is included, can it incorporate roof mounted photovoltaic panels or a biodiverse roof in its design?

#### **Architectural details and design:**

- Does the proposal reflect the characteristics of the locality in its design?
- Does the proposal harmonise with the adjacent properties? This means that it follows the height massing and general proportions of adjacent buildings and how it takes cues from materials and other physical characteristics.
- Does the proposal maintain or enhance the existing landscape features?
- Has the local architectural character and precedent been demonstrated in the proposals?
- If the proposal is a contemporary design, are the details and materials of a sufficiently high enough quality and does it relate specifically to the architectural characteristics and scale of the site?
- Is it possible to incorporate passive environmental design features such as larger roof overhangs, deeper window reveals and/or external louvres/shutters to provide shading in hotter months?
- Can the building designs utilise thermal mass to minimise heat transfer and provide free cooling?
- Can any external structures such as balconies be fixed to the outside of the building, as opposed to cantilevering through the building fabric to reduce thermal bridge?



PLANNING INTELLIGENCE REPORT

# Planning Application Review

Report reference: PAR-001765

|                                |                                |
|--------------------------------|--------------------------------|
| PLANNING APPLICATION REFERENCE | DC/25/1736/HYB                 |
| LOCAL AUTHORITY                | West Suffolk Council           |
| REPORT DATE                    | 15 September 2026              |
| PREPARED BY                    | Planning Application Review UK |

Prepared for information purposes. Evidence-led review of submitted planning material.

## EXECUTIVE SUMMARY

### Key points

- This application seeks hybrid planning permission for 43 dwellings (including affordable housing) with access, roads, parking, garages, public open space and associated infrastructure, along with outline consent (all matters reserved) for commercial use (Use Class E) at land west of Bunters Road, Wickhambrook.
- The official application form records the proposal as a major scheme, not retrospective, with no works started on a 2.67 hectare site currently described as agricultural land.
- Suffolk County Council's Highways consultee supports the route to determination subject to highway design and safety conditions, adoption requirements, and S106 matters.
- The Lead Local Flood Authority (LLFA) initially issued a holding objection (January 2026) and later confirmed no objection subject to drainage conditions (July 2026).
- West Suffolk Council's Air Quality consultee raised no objection after assessment; Energy & Sustainability initially objected to water consumption (112.15 litres/person/day), later recorded a revised compliant value (<110 litres/person/day) with Future Homes Standard, water, and energy requirements secured by condition.
- The formal heritage evidence identifies less than substantial harm to the setting of the adjacent Grade II listed Gaines Cottage. The Senior Conservation Officer recommends that Plot 1 be of bungalow form, with reduced paving, controlled hedging, and clear site levels to mitigate impact.
- Several unresolved matters remain in the supplied evidence:
- Ecology and biodiversity: statutory Biodiversity Net Gain (BNG) applies, but baseline, post-intervention, and onsite net-unit values are not identified. Place Services Ecology maintains a holding objection pending further information and specific mitigation measures (including RAMS/DLL/IACPC).
- Anglian Water objects to surface water connection to the foul sewer; only the foul drainage route is confirmed.
- The design-sensitive heritage matter relating to Plot 1 (bungalow form and mitigation for Gaines Cottage) remains under comment.
- The Housing Enabling & Strategy officer supports the overall mix, but flags accessibility concerns (M4(3) and 1500mm turning circle) for Plot 5 and Plot 43 bathrooms.
- Each technical strand—drainage and surface water, protected species/BNG, heritage-setting/building form, and accessible housing layout—requires further resolution or detail at the next planning stage.

### Key points (continued)

- Public and parish representations raise additional concerns on topics including highways and road safety, footpath width, speeding, commercial use, carbon efficiency, BNG delivery, impact on Gaines Cottage, density, green space, village cohesion, offsite play, and neighbourhood plan alignment; these remain unverified representations and are distinct from technical consultee findings.
- Statutory policy considerations directly engaged in the evidence include: the biodiversity gain condition and 30-year maintenance requirement where BNG is applicable; the statutory duty to preserve the setting of the listed building (Gaines Cottage); and the highway/access policy framework as supported by formal transportation consultation. The Neighbourhood Plan material is referenced for context but is not independently verified as policy in this review.
- The evidence shows that the scheme has evolved through technical consultation, addressing several major issues, but important details—especially relating to biodiversity/ecology and the surface water drainage route—remain only partly evidenced at this stage.
- This report provides an evidence-based review of the submitted application material and relevant retrieved context. It does not constitute legal or professional planning advice. Policy references should be cross-checked with the latest official published versions prior to reliance. Third-party representations are reported as supplied and not independently verified.

## THE PROPOSAL IN PLAIN ENGLISH

This is a hybrid planning application for land west of Bunters Road, Wickhambrook, from Denbury Homes Ltd, with Popham Planning Consultants as agent, to West Suffolk Council. In simple terms, the scheme combines two parts: a full application for 43 new dwellings, including affordable housing, together with the roads, parking, garages, public open space and other associated infrastructure needed to serve them; and an outline application, with all matters reserved, for a commercial development in Use Class E.

The application form says the site is currently in agricultural use, that no work has started, and that the proposal is not retrospective. It also records a 2.67 hectare site, 112 car parking spaces plus 2 disability spaces and 6 visitor spaces, a proposed mains foul sewer connection, and separate waste and recycling storage. The submitted drawings show residential house types and plot layouts for the housing element, including plots with ground and first floor plans shown, but the commercial element is only sought in outline at this stage.

## SITE & SURROUNDING AREA

The application site is land west of Bunters Road, Wickhambrook, CB8 8XY. The submitted form describes the site as agricultural and gives a site area of 2.67 hectares. The proposal is a hybrid application: full planning permission for 43 dwellings, including affordable housing, together with access, roads, parking, garages, public open space and associated infrastructure; and outline permission, with all matters reserved, for commercial use within Use Class E.

The site lies on the western side of Bunters Road and is described in the submitted material as forming part of a wider village-edge context rather than a previously developed site. The supporting evidence also identifies the site as being associated with the parish's wider agricultural character. The formal application form records that foul sewage is intended to connect to the mains sewer, while surface water matters are addressed separately in the drainage submissions and consultee responses.

Several features around the site are material to understanding its context. A public right of way is identified adjacent to the site at Boyden End. The site also sits close to established residential properties and local heritage assets, with the submitted heritage material and consultee comments referring to Gaines Cottage, a Grade II listed building, as a nearby heritage receptor whose setting is relevant to the proposal. The submitted evidence also identifies non-designated heritage assets, including Jasmine Cottage and Rose Cottage, in the wider surrounding area.

The site boundary includes hedgerows and trees that form an important part of the existing edge treatment. The arboricultural evidence refers to several boundary hedgerows, including H3, described as a 40m Hawthorn/Blackthorn/Guelder Rose hedge category B feature, and the proposal involves removal of a 40m section of H3 for access. This is a significant contextual feature because it shows that access formation affects existing boundary vegetation rather than taking place on an entirely open edge. The arboricultural and landscape material also indicates that tree protection, retained hedgerows and replacement/structural planting are important components of the site's relationship with its surroundings.

The site's wider planning context is also relevant to how it sits within Wickhambrook. The parish reference material describes Wickhambrook as a village with a distinct settlement structure and identifies the Bunters Road area as part of the main built-up area. It also notes that the site west of Bunters Road has been allocated in the local planning context for around 40 homes and community facilities and/or retail or local employment. That material is supporting context only, but it helps explain why the site is treated as a growth location rather than isolated countryside.

In visual and settlement terms, the site is closely tied to local movement and edge-of-village relationships. The submitted layout and supporting material show a new access from Bunters Road, with visibility splays to be provided, and the highway evidence treats access arrangement and road safety as key matters. The landscape evidence also shows that the proposal is intended to sit within a structured site layout, with public open space, landscaping and circulation space forming part of the site's relationship to the surrounding area.

The evidence supplied for building form is limited at this section stage. Some plot drawings show ground and first floor plans, but the visual evidence does not support a definitive generalisation about all plots or buildings from the available extract alone. Where the heritage consultee recommends a bungalow form

at Plot 1, that is a plot-specific mitigation suggestion rather than a site-wide description.

Overall, the site is best understood as a village-edge agricultural parcel west of Bunters Road with direct highway frontage, adjacent residential and heritage sensitivities, boundary hedgerows and a nearby right of way. Its surroundings are not presented in the evidence as unconstrained, but as a location where access, landscape containment, heritage setting and drainage relationships all need careful management.

## DESIGN, SCALE & MASSING

The submitted material proposes a hybrid scheme at Land west of Bunters Road, Wickhambrook: full planning permission for 43 dwellings, including affordable housing, together with access, roads, parking, garages, public open space and associated infrastructure, and an outline element for commercial use within Use Class E with all matters reserved. In design and massing terms, the core issue is how this level of built form sits within a rural edge-of-village site that the material repeatedly links to landscape structure, heritage setting and local character. The application form confirms a 2.67 hectare site and 43 dwellings, but no calculated density is stated in the supplied evidence.

The design evidence includes the drawing set and formal consultee comments. The drawings show plot-specific house types, parking allocation, refuse and cycle storage, EV charging locations, landscape structure, and a network of roads and access arrangements. For Plots 21 & 22 and Plots 29 & 30, the supplied drawing evidence explicitly shows ground and first floor plans. For Plot 24, the supplied drawing reference is Drawing no. 116, Rev. B, dated 08/10/25 at 1/100. The supplied drawings therefore support the existence of multi-level accommodation on at least some plots; they do not, by themselves, establish a universal house type or a site-wide building form classification.

A central design and massing consideration is the relationship to Gaines Cottage, a Grade II listed building. West Suffolk Council's Senior Conservation Officer, in comments dated 17 June 2026, recorded less than substantial harm to the setting of the listed building and recommended mitigation including a bungalow form at Plot 1, reduced paving, controlled hedge treatment and clearer site level information. This is a formal local-authority position and should be read as a substantive design concern. The evidence associates the bungalow recommendation specifically with Plot 1, nearest Bunters Road and the listed building, rather than identifying it as a scheme-wide requirement. The parish representation raises a separate concern regarding signage and impact on Gaines Cottage, but this is recorded as an unverified representation.

On landscape and townscape impact, the applicant-appointed landscape technical report records a moderate adverse site-level landscape effect at completion, and a short-term moderate adverse visual effect during construction for nearby receptors. These findings are consultant-stated rather than formal authority conclusions but materially indicate that the built form will be visually present and that landscape mitigation such as retained and reinforced boundary landscaping, structural planting, and buffers is integral to the design approach.

The formal commentary also addresses practical scale issues, including the site level fall of 3 metres from north to south, referenced by the Senior Conservation Officer, as this influences how the built mass is perceived in views and its relationship to Bunters Road and the listed building's setting.

Parish council comments provide additional local perspective, describing the scheme as low density, referencing green space, village cohesion, and the effect of the commercial unit, and stating perceived non-alignment with all Neighbourhood Plan objectives and policies. These do not override the formal technical evidence but show that the scale and mix of uses are matters of local interest. The Neighbourhood Plan extract indicates that Wickhambrook is characterised by small settlements in a high-quality rural landscape and allocates the site west of Bunters Road for around 40 homes and community facilities and/or retail or local employment, with principles including structural landscaping, a landscape

buffer around Rose and Jasmine Cottage, and consideration for the listed building opposite Bunters Road.

In policy terms, the evidence most directly engages West Suffolk Local Plan Policy LP36 on heritage, as the design and massing discussion focuses on the setting of Gaines Cottage and the relationship between the proposal and surrounding historic assets. NPPF paragraph 215 is referenced in formal consultee evidence on harm to listed building settings and mitigation. Policy AP52 is also referenced in the context of the site allocation but is treated as policy context cited in the submitted material unless independently verified in the adopted policy context for this report.

Overall, the design, scale and massing evidence reflects a substantial hybrid development on a 2.67 hectare edge-of-village site, with differentiated house types on at least some plots and reliance on landscaping and layout mitigation. The principal unresolved design issue relates to how built form, especially at Plot 1 and in relation to Gaines Cottage, is finally controlled through the detailed scheme and any conditions or reserved matters for the outline commercial element.

## OVERLOOKING, PRIVACY & AMENITY

Amenity considerations for the proposed development are informed by layout drawings, consultee comments relating to heritage setting, and environmental health comments addressing noise and lighting. While the supplied evidence does not include a dedicated technical assessment exclusively focused on overlooking or privacy, it provides material relevant to amenity-sensitive relationships across the scheme.

A key amenity issue concerns the interface with Gaines Cottage, a Grade II listed building. The Senior Conservation Officer (17 June 2026) records that the proposal would result in less than substantial harm to the setting of Gaines Cottage, and recommends mitigation measures by adjusting layout and external treatment. Specific recommendations include providing a bungalow at Plot 1, reducing hard paving, controlling hedge treatment, and addressing site level changes. Although these recommendations are made in the context of heritage, they are also directly relevant to amenity, highlighting sensitivity regarding the experience of adjoining residents and the visual character of the development edge, particularly along Bunters Road. Both application heritage evidence and representations from the parish council highlight ongoing concern for the amenity of those in proximity to Gaines Cottage, including from signage and roadside features.

Plot-specific floor plan evidence is provided for Plots 21 & 22 and Plots 29 & 30, showing ground and first-floor arrangements. For Plot 24, a drawing number, revision, and scale are supplied. The available plan evidence does not support generalising building arrangement or privacy conditions across all 43 dwellings.

West Suffolk Council's Private Sector Housing and Environmental Health consultee responses are directly relevant to overall amenity. An initial holding objection relating to noise, lighting, and contamination was later withdrawn after revision, but mitigation in the form of post-completion noise assessment, lighting controls, and construction management (including hours) continues to be required. This demonstrates that amenity was a substantive consideration during assessment and that conditions are anticipated to address occupational and construction impacts.

Internal amenity for future occupiers is further addressed in the Housing Enabling & Strategy consultee comments (22 June 2026), which support the housing mix in principle but raise specific concern regarding the adequacy of the bathrooms at Plot 5 and Plot 43 relating to M4(3) accessibility standards and turning space. While not an overlooking matter, this forms part of the broader evaluation of amenity and accessibility within the development.

The parish council's representation adds community-level amenity concerns including issues of village cohesion, density, green space, and the potential impact of the commercial unit. These are unverified representations but are noted as reflecting a broader local interest in the quality of the village setting and overall site design, complementing the formal consultee positions.

In summary, the evidence demonstrates that amenity is addressed primarily through layout design, careful consideration of building form at sensitive edges—especially near Gaines Cottage—and the requirement for mitigation of noise and lighting effects. The documentation does not establish an application-wide privacy or overlooking problem. The most significant amenity sensitivities relate to the site edge and the interface with Bunters Road.

## HIGHWAYS, ACCESS & PARKING

The submitted application is for a hybrid scheme at land west of Bunters Road, Wickhambrook: full planning for 43 dwellings, together with access, roads, parking, garages and associated infrastructure, plus outline provision for commercial use (Use Class E). On the application form, parking is stated as 112 car spaces, 2 disability spaces and 6 visitor spaces, with a new access from Bunters Road. The form also confirms that the proposal is not retrospective and that work has not started.

The highways evidence is strongest on the principle of access and highway design, but it is more limited on some of the practical detail visible in the drawings. Suffolk County Council, in its highways response of 1 July 2026, recorded conditions rather than objection. Its principal concerns and requirements related to detailed highway design, adoption arrangements through a section 38 agreement, a Road Safety Audit, and section 106 contributions. That is a formal technical position, and it is materially different from the separate parish view that raised road safety concerns about the B1063, footpath width, speeding on Bunters Road and the adequacy of any post-approval road safety audit. The parish comments are relevant, but they remain unverified representations rather than formal highway findings.

The access arrangements shown in the submitted material establish a new access from Bunters Road and refer to visibility splays, but the drawing evidence is only partially legible in the supplied material. The submitted records also notes visible references to delivery tracking, bin and cycle access, EV charging and allocated parking by plot, but some drawing references and plot identifiers are not fully clear and require visual rechecking before more precise drawing-based conclusions are made. A separate concern in the evidence is the removal of a 40m section of boundary hedgerow, identified in arboricultural advice as necessary for access. That is relevant to access design and visibility, but it is also an arboricultural matter and should not be treated as a highways finding in itself.

Parking provision is explicitly stated on the application form and is therefore confirmed as submitted scheme information. The supplied material also indicates that bin storage, cycle storage and EV charging provision are included within the layout. However, the detailed arrangement of some parking and access-related elements is partly plan-based rather than fully set out in narrative form, so the evidence is stronger on quantities than on every operational detail. The highways consultee did not identify a fundamental objection to the parking or access strategy, but it did require the scheme to be controlled through conditions and legal agreements.

The most relevant policy context is the application-cited West Suffolk Local Plan reference to highways matters, together with the National Planning Policy Framework paragraph 116, which is cited in the submitted material in connection with highways severity and the balancing of transport impacts. Suffolk Guidance for Parking and Suffolk County Council travel plan guidance are also cited in the application material and consultee responses. Those references matter here because the evidence is specifically about access design, parking provision, road safety and the need for controlled delivery of the highway works, rather than about general transport policy in the abstract.

Overall, the highways and access evidence shows a scheme with a defined new access from Bunters Road, a quantified parking strategy, and a formal county council position that moved to conditions rather than objection. The unresolved points in the supplied material are mainly the detailed implementation of highway works, adoption, road safety audit requirements and the precise plan-level

reading of some access and parking drawings. The parish's road safety concerns remain recorded, but they do not carry the same technical weight as the county council's formal response.

## DRAINAGE & FLOOD RISK

The submitted material presents a drainage strategy for a hybrid proposal at Land west of Bunters Road, Wickhambrook, combining 43 dwellings with an outline commercial element. On foul drainage, the application form states that the proposed connection is to the mains sewer, and the submitted records also identifies Anglian Water as supporting foul drainage in principle, subject to asset-protection requirements. On surface water, the position is different: Anglian Water's formal response objects to any surface water connection into the foul sewer and specifically says surface water must not connect into the foul system. That makes the discharge route for surface water the key drainage point for this section, rather than the foul sewer connection itself.

The Lead Local Flood Authority shows a clear chronology on the same drainage issue. A holding objection was issued on 27 January 2026, then a later July 2026 response recorded no objection subject to conditions. The submitted records treats these as different temporal states on the same subject, not a direct contradiction. In practical terms, the earlier position shows that drainage detail was initially considered insufficient, while the later position indicates that the LLFA's concerns were addressed to the extent that conditions are now relied upon. The unresolved point, as evidenced, is not whether the LLFA still objects, but the content and sufficiency of the remaining drainage conditions.

The Flood Risk Assessment is described in the submitted records as saying the site is not considered to be at groundwater flooding risk, while the area is notified as critical drainage by the Environment Agency. That is a materially relevant distinction: the applicant's consultant is making a groundwater risk statement, but the site still sits within a wider drainage-sensitive context. The evidence therefore supports a need to separate groundwater risk from surface water management and from the statutory drainage response. The submitted material does not identify a confirmed flood-zone designation in the supplied record, so the assessment here rests on the drainage evidence actually provided rather than on any wider flood-zone assumption.

The evidence base on drainage is strongest where formal consultees are engaged. Anglian Water's objection is clear and specific to surface water routing, while the LLFA's later position is a formal no objection subject to conditions after an earlier holding objection. Those positions together show that drainage is not merely a design detail but a matter requiring precise control through the scheme's drainage strategy and condition wording. The report should therefore read this topic as formally engaged and materially important, with the surface-water discharge route remaining the principal point to note and the LLFA's conditions defining the current technical position.

Relevant policy context is limited but material. The Flood & Water Management Act 2010 is cited in the submitted material, and the evidence directly engages drainage design, flood-risk management and surface-water control. That reference matters because the case turns on whether drainage arrangements are acceptable and properly controlled, not simply on whether a connection is proposed. No broader policy catalogue is needed to understand the drainage issue on the evidence supplied.

## ECOLOGY & BIODIVERSITY

The submitted material shows that ecology and biodiversity are central issues for this hybrid proposal. The application is for 43 dwellings with associated infrastructure on land west of Bunters Road, and the submitted evidence identifies Biodiversity Net Gain as applying to the scheme, together with ecology-related consultee concern about protected species, hedgerows and tree protection. The most important formal position is that Place Services' ecology response remains a holding objection, with further information required. That means the ecology case is not presented in the supplied material as fully settled at this stage.

On Biodiversity Net Gain, the submitted records is clear that the statutory BNG requirement applies. The applicant-stated planning material says a "guaranteed BNG of +10%" is secured within the Section 106 document and managed for 30 years, and it refers to a biodiversity metric calculation tool and condition assessment sheets. However, the supplied evidence does not identify the baseline units, post-intervention units, onsite net change, hedgerow units, watercourse units, offsite units, final provider, or Biodiversity Gain Plan stage. It also does not independently confirm acceptance of the applicant's "guaranteed BNG of +10%" wording. In practical terms, the report can only treat this as partial evidence of the delivery route, not as a fully evidenced final BNG outcome.

That distinction matters because where the statutory biodiversity gain regime applies, the policy framework requires the biodiversity gain objective to be met and, where relevant, a biodiversity gain plan to be approved before development begins. The supplied evidence directly engages that statutory regime, but it does not supply the full quantified schedule needed to show how the objective is being met. The evidence therefore supports a statement that BNG is a live planning matter and that the delivery mechanics are not fully visible in the submitted material reviewed here. The report should not convert the absence of a full quantified schedule into a conclusion that BNG cannot be achieved.

Protected species are the other main ecology issue. Place Services records a holding objection on ecology, including Great Crested Newt, and the submitted records says further information is required before determination. The unresolved point is not simply ecological interest in the site; it is whether the submitted information and any mitigation or licensing pathway are sufficient to address the consultee's concerns. The record specifically preserves this as partially supplied evidence. It is therefore material, and it remains a formal consultee issue rather than a parish-only concern.

The ecology evidence also needs to be read alongside the tree and hedgerow information. The supplied material records several boundary hedgerows, including the proposed removal of a 40m section of H3 hedgerow for access, together with arboricultural protection requirements and references to AMS/TPP controls. Place Services' arboricultural position is supportive subject to conditions, but the physical loss of part of H3 for access remains part of the scheme description and should be understood as a direct ecological and landscape intervention. The evidence does not identify a quantified biodiversity-unit loss caused by that hedgerow removal, so it should not be treated as such. It does, however, show a clear relationship between the access layout and boundary habitat change.

The Parish Council raises additional concerns about biodiversity-related matters, including a positive reference to "+10% biodiversity net gain", low density, green space, village character and offsite play provision. Those are relevant local concerns, but they remain unverified representations and must not be

treated as technical findings. They do, however, reinforce that ecology and green infrastructure are important local issues in the proposal.

From the policy context supplied, the most directly engaged reference is the statutory biodiversity gain regime under Schedule 7A of the Town and Country Planning Act 1990, inserted by the Environment Act 2021. That matters here because the submitted material expressly engages a statutory BNG requirement and a claimed 30-year management period. The evidence also engages the application-cited West Suffolk Local Plan references and the neighbourhood-plan context only insofar as they are used in the submitted material to frame local landscape and habitat expectations, but they do not substitute for the missing quantified BNG detail.

Overall, the ecology and biodiversity position is one of partial supply rather than full resolution. The formal ecology consultee remains at holding objection stage on protected species matters, the BNG evidence is incomplete at the quantified delivery level, and the hedgerow/access implications are clearly identified in the submitted material. The most secure conclusion is that ecology remains a material consideration requiring careful separation of applicant-stated BNG delivery, formal consultee concern, and the more limited drawing and metric evidence actually supplied.

## TREES, LANDSCAPE & VISUAL IMPACT

The submitted material describes a major hybrid proposal for housing and an outline commercial element on land west of Bunters Road, with the full element providing 43 dwellings, new access, roads, parking, garages and public open space. For trees, landscape and visual impact, the key evidence comes from the applicant-appointed landscape and arboricultural material, the West Suffolk Council Senior Conservation Officer, Place Services, the formal highways response, and the parish representation.

The most significant landscape information is the applicant-appointed consultant's conclusion that the scheme would have a moderate adverse site-level landscape effect at completion, with a moderate adverse short-term visual effect during construction for nearby receptors. Those are consultant-stated assessments rather than formal authority findings, but they are material because they indicate that the development would not be visually neutral even after the site is established. The evidence also records that the site is an agricultural parcel with boundary hedgerows, tree planting proposals and wider landscape structure, and that the proposal includes public open space and new and replacement hedge planting. The applicant-appointed landscape material is therefore presenting mitigation as part of the scheme, rather than suggesting an absence of landscape effect.

Tree and hedgerow impacts are a central issue. The submitted evidence records several boundary hedgerows, some of which are impacted or removed for access, and specifically identifies removal of a 40m section of H3 hedgerow for access. That hedge is described in the supplied material as 40m Hawthorn/Blackthorn/Guelder Rose, and the arboricultural advice links the access arrangement to tree protection requirements. This is a direct, scheme-specific tree and hedgerow loss associated with the proposed access from Bunters Road. The evidence does not quantify any wider arboricultural loss beyond that hedgerow section, so it would be inaccurate to generalise from this to all boundary vegetation on the site.

The formal arboricultural position is more qualified than the applicant's general landscape material. Place Services' arboricultural response supports the proposal subject to an Arboricultural Method Statement, Tree Protection Plan and related conditions. That is a formal consultee position and it materially indicates that the tree resource can only be treated as acceptable with defined protective controls, not as unqualified endorsement. In practical terms, the evidence suggests that existing hedgerows and trees are not merely decorative; they are part of the site structure and part of the mitigation relied upon to manage the transition from farmland to housing.

There is also a clear visual-design dependency around the setting of Gaines Cottage, which is identified in the submitted evidence as a Grade II listed building. The Senior Conservation Officer's 17 June 2026 comment records less than substantial harm to the setting and recommends mitigation through layout and landscape measures, including a bungalow at Plot 1, reduced paving, controlled hedge treatment and clearer site level information. Although that is a heritage response, it is directly relevant to landscape and visual impact because it shows that building form, boundary treatment and levels are being used to reduce visual prominence close to a sensitive edge of the site. The parish representation separately raises concern about signage and the impact on Gaines Cottage, which should be treated as an unverified community concern rather than a formal technical finding.

The site levels are another material visual factor. The Senior Conservation Officer refers to a 3-metre fall

from north to south. That level change matters because it affects how the proposed housing massing will read in views and how much cut, fill or platforming may be apparent from surrounding public vantage points, including Bunters Road. The supplied material does not provide a separate formal landscape finding on earthworks, so the significance of that level change should be understood as part of the visual and setting context rather than as a standalone engineering issue.

The drawing evidence is only partly conclusive on building form, and that matters for visual impact. The submitted records notes that Plots 21 and 22 and Plots 29 and 30 have explicit Ground and First Floor Plans, while Plot 24 is identified only by drawing number, revision and scale. The record also notes that no explicit “bungalow” label appears on the drawing plans, even though the Senior Conservation Officer recommends a bungalow form for Plot 1. That means the visual evidence supports a concern about building form and visibility, but it does not allow the drawings alone to be read as expressly confirming the form of every plot. Where the officer is trying to reduce visual impact near Gaines Cottage, the form of the nearest unit is part of the mitigation discussion.

Public realm and movement features also have a landscape dimension. The site includes a public right of way at Boyden End identified in the applicant-appointed landscape and arboriculture report. That makes the boundary treatment, hedge retention and screening strategy more important because the route may experience close-range views of the development edge. The drawing material also references landscape strategy, hard and soft landscaping, new/replacement hedge and tree planting, and foundation requirements. These features are relevant because they show the landscape design is intended to be integral to the scheme rather than an afterthought.

Overall, the evidence shows a scheme that would alter a visibly bounded agricultural site with a defined hedge structure, some loss of hedgerow for access, and a likely moderate adverse landscape effect at completion according to the applicant-appointed consultant. The formal consultee position does not reject the principle of development on landscape or arboricultural grounds, but it does attach importance to protective conditions and to specific mitigation near Gaines Cottage. The unresolved practical point is not whether landscape effects exist — the evidence shows that they do — but how far the final layout, hedge treatment, building form at the sensitive edge and treatment of levels successfully contain those effects.

## HERITAGE & SETTING

The submitted material identifies a heritage setting issue at Gaines Cottage, which is recorded in the submitted evidence as a Grade II listed building. The development is therefore directly engaged with the statutory duty to have special regard to preserving the building's setting, and any features of special architectural or historic interest. The evidence also identifies two non-designated heritage assets, Jasmine Cottage and Rose Cottage, in the applicant-appointed heritage material.

The strongest formal heritage position is the Senior Conservation Officer comment dated 17 June 2026. That response records an assessment of the proposal's impact on the setting of Gaines Cottage and concludes that the effect would amount to less than substantial harm. It also sets out mitigation-focused recommendations, including a bungalow form at Plot 1, reduced paving, controlled hedge treatment and clearer understanding of site levels. This is a formal consultee position with substantive assessment and reasons, so it carries materially greater weight than the parish representation. The same officer comment indicates that the harm was considered capable of being moderated through layout and landscape treatment rather than through a wholesale redesign of the scheme.

The heritage evidence should be read alongside the drawing and form material with care. The submitted records notes that some plot-level drawing evidence is visually incomplete, and that the bungalow recommendation for Plot 1 comes from the conservation officer rather than from an explicit drawing label. The submitted drawings visible in the supplied chunks include ground and first-floor plans for some plots, but they do not, by themselves, establish a general building-form classification for the heritage-sensitive plots. It is therefore safest to treat the conservation advice on form as a heritage mitigation recommendation, not as a drawing-based factual description of all affected dwellings.

The parish representation separately raises concern about the impact on Grade II Gaines Cottage, including signage and village-cohesion effects. That concern is material context, but it remains an unverified public representation rather than a formal heritage finding. It broadly aligns with the officer's acknowledgement that the setting of Gaines Cottage is sensitive, but it does not add independent technical evidence beyond the concerns already assessed by the conservation officer.

The applicant-appointed heritage material identifies Jasmine Cottage and Rose Cottage as non-designated heritage assets and says they would be affected by the proposal. That material is relevant to the wider setting assessment, but it remains applicant-stated unless independently adopted by a formal authority. The supplied evidence does not show a separate formal heritage conclusion on those assets comparable to the Grade II listing position for Gaines Cottage.

In policy terms, the issue is materially engaged by the statutory listed-building duty and by the heritage-balancing approach reflected in the National Planning Policy Framework paragraph 215, both of which are directly relevant to a proposal affecting the setting of a listed building. The submitted documents also cite West Suffolk Local Plan policy LP36 in connection with heritage matters, but that citation should be treated as policy references cited in the application documents rather than independently verified policy text in this section.

Overall, the evidence shows a clearly identified heritage-setting sensitivity around Gaines Cottage, with a formal conservation response that accepts some level of less than substantial harm and points to mitigation through design, landscaping and site-level treatment. The parish concern about signage and

the applicant's references to other heritage assets remain part of the evidence base, but they do not displace the formal consultee position on the principal listed-building issue.

## NOISE, LIGHTING & DISTURBANCE

The submitted material indicates that noise, lighting and disturbance were material issues for this hybrid proposal, particularly during construction and in relation to the final residential layout. West Suffolk Council's Private Sector Housing and Environmental Health response is recorded as having moved from a holding objection in December 2025 to the objection being withdrawn by June 2026 after revision, with continuing recommendations including a post-completion noise assessment, lighting controls and construction hours. That is a formal local-authority position and it shows the topic was actively reviewed rather than left unconsidered.

On noise, the submitted records shows a chronology rather than a direct contradiction. Earlier Environmental Health concern was recorded as a holding objection where the submitted information was considered insufficient. A later position records the objection as withdrawn after revision, subject to controls and further post-completion noise assessment. The evidence therefore points to a resolved assessment stage, but not to a blank issue: the residual concern is being managed through conditions and further assessment rather than treated as absent. The formal position is more robust than any Parish concern, and the Parish Council's general objections do not carry the same technical weight as the local authority's assessed response.

On lighting, the same Environmental Health response identifies the matter as part of the assessed scheme and refers to lighting controls. The broader technical policy basis cited in the submitted material includes ILP GN01/21 and BS 8233:2014, but the report material supplied here does not provide a full standalone lighting assessment result in the way it does for some other topics. The evidence is therefore sufficient to show that lighting was addressed and that controls were still being tied into the scheme, but it is not sufficient to describe the issue as closed without qualification. The most reliable statement is that lighting is a managed design and condition matter within the current scheme.

Disturbance from construction is also materially engaged. The application form states that no work has started, and the formal consultee and parish material both refer to construction management controls. The evidence does not separate out a dedicated construction-noise study from the wider environmental health response, but it does show that construction hours and controls were part of the assessed mitigation package. This is important because it distinguishes the temporary disturbance arising during building works from the longer-term operational noise of the completed development. The supplied evidence does not establish a wider unresolved technical objection on this point once the revised scheme and controls were taken into account.

The Parish Council's representation raises noise-adjacent and disturbance-related themes indirectly through concerns about village cohesion, traffic, and the commercial element, but those are lower-weight representations rather than formal technical findings. They remain relevant context, especially where they overlap with movement and construction activity, but they do not override the formal Environmental Health position.

Overall, the evidence supports a proportionate conclusion that noise, lighting and disturbance were material and reviewed issues, with the main technical concern being moved from an earlier holding objection to a later controlled position. The remaining significance lies in the need for conditions and post-completion assessment, rather than in an unresolved objection on the face of the supplied material.

## PLANNING POLICY POSITION

The submitted material describes a hybrid proposal for 43 dwellings, including affordable housing, together with access, roads, parking, garages, public open space and associated infrastructure, plus an outline element for commercial use in Use Class E. The planning policy case therefore engages housing supply, settlement strategy, design and residential amenity, heritage setting, highways and access, energy and water efficiency, ecology and biodiversity gain, and the principle and scale of the mixed-use element.

A central policy reference in the submitted material is West Suffolk Local Plan 2024-2041 Policy AP52. That matters because the case evidence repeatedly links the site to the Bunters Road allocation and to the wider development framework for Wickhambrook. The Parish reference context also describes the site west of Bunters Road as an allocation for around 40 homes with community facilities and/or retail or local employment, which is broadly consistent with the application's hybrid residential and commercial structure. The supplied evidence does not, however, provide a formal policy analysis resolving every site-specific detail against AP52; it shows that AP52 is the key allocation policy engaged, not that compliance is automatically established.

Several of the submitted documents and consultee responses cite West Suffolk Local Plan 2024-2041 Policies LP1, LP2 and LP5 in connection with general development principles, sustainability and water efficiency. This is materially relevant because the Energy & Sustainability consultee first objected to a residential water consumption figure of 112.15 litres/person/day, then later recorded a revised figure below 110 litres/person/day. The evidence therefore shows a policy issue under LP5 that moved from objection to a later condition-led position after revision. The same policy group is also relevant to the proposal's sustainability claims, but the supplied material preserves those claims as part of the applicant-led case rather than as a standalone formal policy finding.

Policy LP35 is cited in the submitted material in relation to the overall development framework, while Policy LP36 is cited in relation to heritage. That is directly relevant because the site affects the setting of Gaines Cottage, identified in the evidence as a Grade II listed building, and because the Senior Conservation Officer recorded less than substantial harm together with mitigation suggestions, including a bungalow form at Plot 1, reduced paving, controlled hedging and clearer site level treatment. The policy significance here lies in the balancing exercise for designated heritage assets and their setting, not in any claim that heritage impact is absent. The evidence also identifies Jasmine Cottage and Rose Cottage as non-designated heritage assets in the applicant-appointed heritage material, which broadens the heritage context but remains a separate, lower-weight source role from the formal conservation response.

Policies LP42 and LP43 are cited in the submitted material in relation to highways and access. That is materially engaged because the proposal introduces a new access from Bunters Road, requires visibility splays, and has attracted a formal highways response from Suffolk County Council. The highways consultee's later position was conditions-based, with detailed highway design, a s38 agreement, a Road Safety Audit and S106 contributions referenced. Against that formal position, the Parish Council's concerns about B1063 road safety, footpath width, speeding and the adequacy of a post-approval Road Safety Audit should be read as unverified representation rather than as a formal technical conclusion. The policy relevance is therefore clear: access, highway safety and the adequacy of mitigation are live

policy issues under the cited highways policies, but the supplied evidence does not present them as unresolved in the same way as the ecology position.

The National Planning Policy Framework is cited in the submitted material, including paragraphs 111, 116 and 215. Paragraph 111 is relevant to the mixed-use structure because the proposal includes both housing and an outline commercial element, so the question is not only land use principle but also whether the scale and mix are policy-supportable in the local context. Paragraph 116 is directly relevant to highway safety, because the formal highway response and the Parish objections both focus on access, movement and road safety. Paragraph 215 is relevant to the heritage balancing exercise for Gaines Cottage, where the evidence records a less than substantial harm assessment and mitigation-led comments rather than an outright refusal position. Paragraph 100 appears in the submitted policy register in relation to education infrastructure, but the supplied evidence on school capacity is limited to contributions and a letter stating no forecast to exceed 95% capacity; that is more appropriately treated as infrastructure context than as a standalone policy conflict.

The policies cited in the submitted documents also includes Wickhambrook Neighbourhood Plan policies and objectives, but the relevance-selected parish extract supplied here does not visibly print exact policy references. For that reason, the parish material can only be used as contextual support for the village vision, settlement structure, landscape character, accessibility, heritage protection and highway safety themes described in the extract. It cannot be treated in this report as an independently verified policy list. The extract does, however, show a strong local planning context: Wickhambrook is presented as a Local Service Centre, with development expected to relate well to existing services, protect rural character, safeguard heritage assets, and ensure the road network and public rights of way can cope with growth. Those themes align closely with the application's principal policy issues, even though the exact neighbourhood-plan policy numbering is not visible in the supplied parish context.

Biodiversity Net Gain is another major policy topic engaged by the evidence. The current policy context supplied for the report includes the statutory biodiversity gain objective, the biodiversity gain condition, the biodiversity gain plan approval test and the 30-year maintenance requirement where significant onsite habitat enhancement is relied upon. That matters because the submitted evidence confirms that BNG applies to this application, that the statutory requirement is said to apply, and that applicant-stated material refers to a guaranteed +10% BNG secured through Section 106 and managed for 30 years. However, the formal ecological position remains a holding objection pending further information, and the quantified metric result, baseline, post-intervention and net change values are not identified in the supplied material. The policy significance is therefore that the statutory regime is clearly engaged, but the exact delivery route and full technical support for the claimed outcome are not fully evidenced in the material supplied for this report.

Overall, the most materially engaged policy references in the supplied evidence are AP52, LP5, LP36, LP42, LP43 and the cited NPPF paragraphs 111, 116 and 215, with the statutory biodiversity gain regime also directly relevant. The submitted material shows that the application is being assessed within an allocation-led local policy context, with key issues concentrated on housing delivery, mixed use, highway access, water efficiency, heritage setting and biodiversity gain. It does not, however, provide a complete policy-compliance resolution for every topic; where formal consultee positions remain condition-led or partial, that remains part of the evidence rather than a policy conclusion.

## INFORMATION GAPS & CLARITY ISSUES

The submitted material is substantial, but several parts of the evidence remain incomplete or require careful clarification before the scheme can be understood with confidence. The main uncertainties relate to biodiversity net gain, ecological mitigation, drainage detail, building-form interpretation from drawings, and some application-form fields that are not populated.

The most material gap is the biodiversity net gain position. The submitted records confirms that BNG applies to this hybrid application and that the submitted material refers to a statutory metric, condition assessment sheets, a claimed “guaranteed BNG of +10%” and 30-year management. However, the supplied evidence does not identify the baseline units, post-intervention units, onsite net change, or any quantified offsite route. Place Services ecology also maintains a holding objection and asks for further information. On the evidence supplied, the key issue is therefore not whether BNG is mentioned, but whether the full statutory delivery route and supporting documentation are complete and accepted. The report should treat this as partially supplied evidence rather than a confirmed full BNG outcome.

Ecology and protected species evidence is also incomplete. Place Services records a holding objection and seeks further information, including matters linked to Great Crested Newt and RAMS/DLL/IACPC-related requirements. The supplied material shows that ecological concern remains live, but it does not provide a complete closure of the issue in the evidence bundle reviewed here. This means the ecological position should be read as unresolved on the supplied record, not as a technical acceptance.

Drainage evidence is clearer than the ecology position, but there is still an important distinction to preserve. Suffolk County Council as Lead Local Flood Authority moved from a holding objection in January 2026 to no objection subject to conditions in July 2026. That is a chronological development on the same drainage topic, not a contradiction. Even so, the precise condition wording and any detailed drainage drawing or final routing clarification are not fully set out in the evidence package. Separately, Anglian Water objects to surface water connecting to the foul sewer and requires foul and surface water to remain distinct. The unresolved point in the supplied material is therefore the detailed surface water routing, not whether the application has any drainage issue at all.

There is also a drawing-clarity issue on building form. The evidence shows explicit Ground and First Floor Plans for Plots 21 and 22 and for Plots 29 and 30, while Plot 24 is identified only by drawing number, revision and scale. The record also notes that some drawing references and labels are not fully legible in the supplied chunks. Because of that, the drawings support only limited conclusions about form for the specific plots shown, and they do not justify a wider assumption about storey height or dwelling type where the source does not expressly state it. The conservation officer’s reference to a bungalow at Plot 1 is a separate formal-consultee recommendation and should not be conflated with the drawing evidence for other plots.

The application form also leaves several factual fields blank or only partly specified. Occupant numbers and staffing numbers are not supplied. The residential use class is not stated, even though the form does specify Use Class E for the commercial element. The site area, parking provision and existing use are given, but the evidence does not provide a complete operational profile for the residential element. These are information gaps rather than contradictions.

In heritage terms, the position is broadly evidenced but still depends on mitigation detail. Gaines Cottage

is identified as a Grade II listed building, and the Senior Conservation Officer records less than substantial harm, with recommendations including bungalow form at Plot 1, reduced paving, controlled hedge treatment and clearer site levels. The remaining clarity issue is not the existence of heritage sensitivity, but the extent to which the final scheme secures the suggested mitigation in a form that can be clearly tied to the submitted layout and drawings.

There is also a smaller but still relevant clarity issue around the Parish Council's concerns. The Parish raises concerns about road safety, the commercial unit, BNG, Gaines Cottage, density, village cohesion and neighbourhood-plan alignment. These are materially relevant representations, but they remain unverified as technical findings unless independently supported by formal consultee evidence. They should therefore be treated as representations, not as established conclusions.

Overall, the evidence base is sufficient to identify the main planning topics, but not complete enough to leave every topic fully resolved. The most important open questions in the supplied material concern the detailed BNG delivery route, the remaining ecology information request, the precise surface-water solution, and some plot-specific drawing interpretation.

## PROFESSIONAL DISCLAIMER

This report is an evidence-led review of the planning application documents supplied for assessment. It is prepared for information purposes only and does not constitute legal, planning, surveying, engineering, ecological or other professional advice.

Policy references are included only where supported by the documents and policy material reviewed for this report. They should be checked against the latest published versions and confirmed with the relevant Local Planning Authority before being relied upon. Planning policy may be amended, superseded or interpreted differently by the decision-maker.

The report does not independently verify every factual statement, technical conclusion or consultee position contained in the submitted documents. Its findings are limited to the evidence available at the time of review. Independent professional advice should be obtained where required.