

Little Waldingfield Neighbourhood Plan

Site Options and Assessment

Little Waldingfield Parish Council

22 October 2018

Quality information

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Abbreviations used in the report

Abbreviation

AONB	Area of Outstanding Natural Beauty
BMSDC	Babergh and Mid-Suffolk District Councils
BUAB	Built Up Area Boundary
Ha	Hectare
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
SHELAA	Strategic Housing and Economic Land Availability Assessment
SPD	Supplementary Planning Document
TPO	Tree Preservation Order

1. Executive Summary

This report is intended to help the neighbourhood planning group select a preferred site or sites for allocation to meet future growth requirements of the village in accordance with Local Plan policy.

The Little Waldingfield Neighbourhood Plan, which will cover the whole of Little Waldingfield Parish, is being prepared in the context of the Babergh and Mid Suffolk and District Councils (BMSDC) planning framework. Consideration is being given to the possibility of including housing allocations in the Neighbourhood Plan to manage and steer development on sustainable sites to meet any potential identified housing requirement in the emerging plan. In accordance with the Local Plan Little Waldingfield is identified as a Hinterland Village. These villages will accommodate some development to help meet housing need in accordance with Policy CS3: Strategy for Growth and Development.

Three sites were identified in a Call for Sites consultation undertaken by Babergh District Council for the Strategic Housing and Economic Land Availability (SHELAA) in August 2017. Building on the SHELAA assessments undertaken by Babergh District Council, AECOM has undertaken an assessment of two potentially suitable site options to ascertain which site is the most appropriate to allocate in the Neighbourhood Plan in line with Local Plan policy. It was found that allocation of part of Site SS0874 (Land to the south east of The Street, Little Waldingfield) was more appropriate than allocation of Site SS0545 (Land west of The Street, Little Waldingfield), when assessed against the core elements of achieving planning consent, namely impact on designated heritage assets, appearance and layout, means of access, landscaping, and scale of development.

Site selection and viability should be further discussed with BMSDC and through community consultation.

2. Introduction

2.1 Site selection and site allocations are one of the most contentious aspects of planning, raising strong feelings amongst local people, landowners, developers and businesses. It is important that any selection process carried out is transparent, fair, robust and defensible and that the same criteria and process is applied to each potential site. Equally important is the way in which the work is recorded and communicated to interested parties so the approach is transparent and defensible. This report is intended to help the neighbourhood planning group select preferred sites for allocation to meet potential future growth requirements of the village in accordance with Local Plan policy.

Background

2.2 AECOM has been commissioned to undertake an independent site appraisal for the Little Waldingfield Neighbourhood Plan on behalf of Little Waldingfield Parish Council. The work undertaken was agreed with the Parish Council and the Ministry of Housing, Communities and Local Government (MHCLG) in May 2018.

2.3 The Neighbourhood Plan, which will cover the parish of Little Waldingfield within the district of Babergh (**Figure 1**), is being prepared in the context of the emerging Local Plan. Consideration is being given to the possibility of including housing allocations in the Neighbourhood Plan to manage and steer development on sustainable sites, to meet any potential identified housing requirement in the emerging plan.

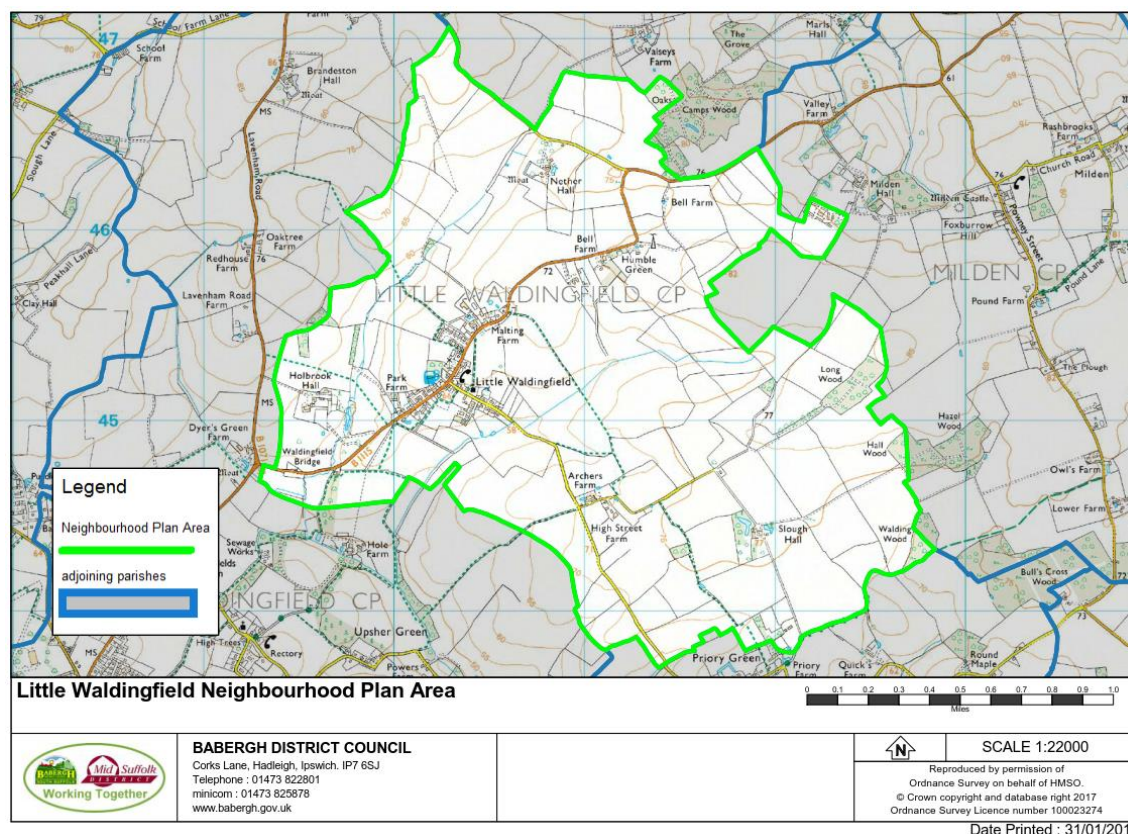


Figure 1 Little Waldingfield Neighbourhood Plan Boundary

2.4 Little Waldingfield is within the administrative area of Babergh and Mid Suffolk and District Council (BMSDC). The Babergh Local Plan Alteration No.2 was adopted by the Council on 1st June 2006. It sets out the detailed policies and proposals for the control of development across the district. The adoption of the Babergh Core Strategy has superseded some of the Local Plan policies. The Core Strategy which was adopted by Council on 25th February 2014 contains the strategic objectives and policies for the key planning issues of housing, employment,

environmental protection and infrastructure improvement. The Local Plan and Core Strategy do not set a provision for housing development in Little Waldingfield.

- 2.5 BMSDC are in the process of producing a new Joint Local Plan, which will replace the 2006 Local Plan. The latest iteration of the draft plan (Reg 18) was published in November 2017. The draft plan includes potential residential development options for Little Waldingfield (defined as a Hinterland Village¹), which came forward through the Call for Sites consultation for the Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment (2017).
- 2.6 The new Joint Local Plan covers the period up to 2036 and will set out the key policies for the district. It will comprise a suite of BMSDC's strategic and development management policies together with site proposals illustrated by a Local Plan Proposals Map. Little Waldingfield remains as a Hinterland Village in the spatial hierarchy, where growth options vary from 5% to 15% of the District's growth.
- 2.7 The Objectively Assessed Need published in the Ipswich and Waveney Housing Market Areas: Strategic Housing Market Assessment (2017) from 2014-2036 for the Babergh Local Authority area is 7,820 new dwellings, which equates to 355 new dwellings a year. However this figure only represents a 'starting point' in identifying housing requirements. There are a number of other factors that will be considered when setting the final figure in the Emerging Joint Local Plan.
- 2.8 BMSDC, through the work being undertaken to prepare the emerging Local Plan, has undertaken a comprehensive site appraisal of three sites that came forward as a result of a "call for sites" exercise. The BMSDC SHELAA Site Assessment Report has identified two sites that have potential for residential development to sustainably grow the village, with a third site found not suitable due to access issues and poor connectivity to the settlement pattern. In this context, the Parish Council has asked AECOM to undertake an independent assessment of the two sites to add value to the SHELAA findings. This objective assessment of the two sites will further explore the deliverability of housing.
- 2.9 Both sites have been identified as suitable, available and viable for the development proposed. The site appraisal is therefore intended to further guide decision making and provide evidence for the eventual site selection to help ensure that the Neighbourhood Plan can meet the Basic Conditions considered by the Independent Examiner, as well as any potential legal challenges by developers and other interested parties.
- 2.10 All existing work has been reviewed and site visits have been undertaken to verify the findings.

¹ It has been indicated informally by Babergh District Council to Little Waldingfield Parish Council that the village potentially could be designated as a Hamlet in the emerging Babergh & Mid Suffolk Joint Local Plan. In accordance with emerging policy Hamlets, defined as a nucleus of at least 10 dwellings fronting the highway, will potentially have to deliver 5% of the districts growth through appropriate infill development. As Little Waldingfield does not readily fit the definition of a hamlet in the emerging Local Plan and is currently designated as a Hinterland Village within the spatial hierarchy under adopted policy and emerging policy. Babergh and Mid Suffolk Councils are currently considering growth options for Hinterland Villages, which vary from delivery of 5% to 15% of the District's growth.

3. Policy Context

Planning Policy

3.1 The Neighbourhood Plan policies and allocations must be in accordance with the strategic policies of the Local Plan, and have regard to the emerging Local Plan. The Local Plan evidence base also provides a significant amount of information about potential developments in Little Waldingfield.

3.2 The key documents for BMSDC’s planning framework include:

- Adopted Babergh Part 1 Local Plan 2011-2031 Core Strategy & Policies, February 2014²;
- Saved Policies from the Babergh Local Plan 2006, as of June 2016³;
- Rural Development & Core Strategy Policy CS11 Supplementary Planning Document (SPD), August 2014⁴;
- Babergh & Mid Suffolk Joint Local Plan Consultation Document, August 2017⁵; and
- Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment Draft, August 2017⁶.

3.3 The following, **Figure 2**, is taken from BMDCs Interactive Web Map Layers⁷. This map shows the location of the Little Waldingfield Conservation Area and the presence of Tree Preservation Orders in the village.

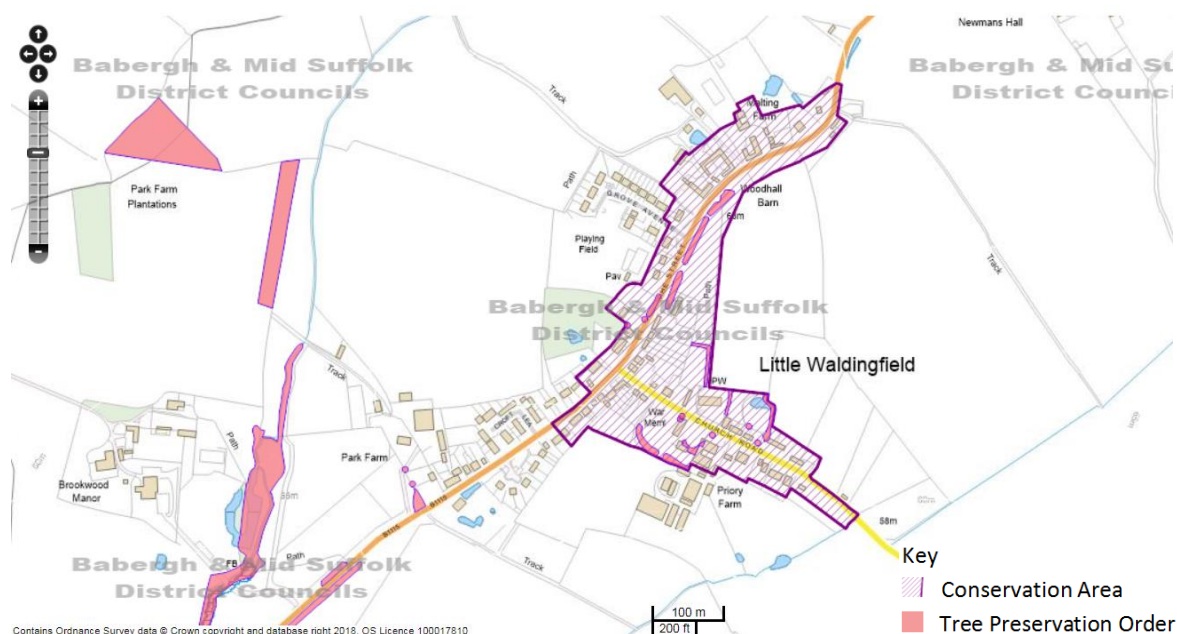


Figure 2 Planning and Environment designations within Little Waldingfield village

² Available at <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-Core-Strategy/CORE-STRATEGY-AND-POLICIES-FINAL-Feb-2014.pdf>

³ Available at <https://www.babergh.gov.uk/planning/planning-policy/adopted-documents/babergh-district-council/babergh-local-plan/>

⁴ Available at <https://www.babergh.gov.uk/assets/Strategic-Planning/SPD-Babergh/CS11-SPD-Adoption-Version.pdf>

⁵ Available at <http://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-consultation-document/>

⁶ Available at <http://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Draft-BMSDC-Joint-SHELAA-Report-August-2017.pdf>

⁷ Available at Available at <http://maps.midsuffolk.gov.uk/>

Babergh Local Plan 2011-2031 Core Strategy & Policies (Part 1 of New Babergh Local Plan) February 2014

- 3.4 The 2014 Core Strategy sets out a range of policies governing development in Babergh District. Those of relevance to development to Little Waldingfield include:
- 3.5 *Policy CS2: Settlement Pattern Policy* – The development strategy for Babergh is planned to a time horizon of 2031. Most new development (including employment, housing, and retail, etc.) in Babergh will be directed sequentially to the towns / urban areas, and to the Core Villages and Hinterland Villages. Little Waldingfield is identified as a Hinterland Village. These villages will accommodate some development to help the needs within them. All proposals will be assessed against *Policy CS11: Strategy for Development for Core and Hinterland Villages*. In the countryside, outside the towns/urban areas, Core and Hinterland Villages, development will only be permitted in exceptional circumstances subject to a proven justifiable need.
- 3.6 *Policy CS3: Strategy for Growth and Development* – Babergh District Council will make provision for 5,975 new dwellings between 2011 and 2031 in the District, of which 1,050 are planned in the Core and Hinterland Villages. There are, however, no housing allocations in the Core Strategy for Little Waldingfield.
- 3.7 This housing figure was written on the basis that the quantum and distribution of new development would be dealt with in a Local Plan Site Allocations Document. However, this may not be prepared for some time and in the meantime proposals for Core and Hinterland Villages will be considered on the basis of the policies in the Core Strategy and the guidance set out in Rural Development & Core Strategy Policy CS11 SPD (2014).
- 3.8 *Policy CS11: Strategy for Development for Core and Hinterland Villages* – Proposals for development in Hinterland Villages will be approved where proposals score positively when assessed against Policy CS15, and the following matters are addressed to the satisfaction of the local planning authority (or other decision maker) where relevant and appropriate to the scale and location of the proposal:
- i. The landscape, environmental and heritage characteristics of the village;
 - ii. The locational context of the village and the proposed development (particularly the AONBs, Conservation Areas, and heritage assets);
 - iii. Site location and sequential approach to site selection;
 - iv. Locally identified need – housing and employment, and specific local needs such as affordable housing;
 - v. Locally identified community needs; and
 - vi. Cumulative impact of development in the area in respect of social, physical and environmental impacts.
- 3.9 Development in Hinterland Villages will be approved where proposals are able to demonstrate a close functional relationship to the existing settlement, on sites where the relevant issues listed above are addressed to the satisfaction of the local planning authority (or other decision maker) and where the proposed development:
- i. is well designed and appropriate in size / scale, layout and character to its setting and to the village;
 - ii. is adjacent or well related to the existing pattern of development for that settlement;
 - iii. meet a proven local need, such as affordable housing or targeted market housing identified in an adopted neighbourhood plan;
 - iv. supports local services and/or creates or expands employment opportunities; and

- v. does not compromise the delivery of permitted or identified schemes in adopted community / village local plans within the same functional cluster.
- 3.10 Policy CS11 also states that the cumulative impact of development within the Hinterland Village in which the development is proposed and within the functional cluster of villages in which it is located will be a material consideration when assessing such proposals.
- 3.11 *Policy CS15: Implementing Sustainable Development in Babergh* – Proposals for development must ensure adequate protection, enhancement, compensation and/or mitigation, as appropriate, are given to distinctive local features which characterise the landscape and heritage assets of Babergh's built and natural environment within designated sites covered by statutory legislation, such as: AONBs, Conservation Areas, etc. and local designations such as Special Landscape Areas and County Wildlife Sites, and also local features and habitats falling outside these identified areas. In particular, proposals should protect and where possible enhance landscape and heritage areas including habitats and features of landscape, historic, architectural, archaeological, biological, hydrological and geological interest. Proposals should respect the landscape, landscape features, streetscape /townscape, heritage assets, important spaces and historic views by making a positive contribution to the local character, shape and scale of the area and seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars, thus improving air quality.

Saved Policies as of 2016 from the Babergh Local Plan 2006

- 3.12 The saved policies of relevance to development in Little Waldingfield include the following.

Policy HS05 Replacement Buildings - Outside the built-up areas of Towns and Villages, planning permission may be granted to replace a dwelling and ancillary outbuildings on or very close to the same site. The replacement of two or more small dwellings with one larger one will not be permitted, even if all the above criteria have been met, except when it can be demonstrated that the dwellings to be replaced would not meet any identified local housing need.

Policy HS28 Infill – Planning application for infilling or groups of dwellings will be refused where:

- The site should remain undeveloped as an important feature in visual or environmental terms;
- The proposal represents overdevelopment to the detriment of the environment, the character of the locality, residential amenity or highway safety;
- The layout provides an unreasonable standard of privacy, garden size or public open space; and
- The proposal is of a scale, density or form which would be out of keeping with adjacent and nearby dwellings or other buildings.

Policy CR08 Hedgerows – Where development proposals affect hedgerows of amenity or landscape significance, planning permission will only be granted where:

- Hedgerows are retained in full, or
- Suitable mitigation such as replacement planting and management programmes are proposed.

Policy CN01 Design Standards – All new development proposals will be required to be of appropriate scale, form, detailed design and construction materials for the location. Proposals must pay particular attention to the scale, form and nature of adjacent development and the environment surrounding the site.

Policy CN06 Listed Buildings – Proposals for new work within the curtilage or setting of a listed building should not conceal features of importance or special interest; be of an appropriate scale, form, siting and detailed design to harmonise with the existing building and

its setting; retain a curtilage area and/or setting which is appropriate to the listed building and the relationship with its setting; and respect those features which contribute positively to the setting of a listed building.

Policy CN08 Conservation Area - Proposals for the alteration, extension or change of use of an existing building, or for the erection of new buildings in a conservation area or which have an impact on views into or out of a conservation area should:

- preserve or enhance the character of the conservation area or its setting;
- retain all elements and components, including spaces, which contribute to the special character of the area;
- be of an appropriate scale, form, and detailed design to harmonise with its setting;
- include fenestration which respects its setting;
- use materials and components that complement or harmonise with the character and appearance of the area; and
- ensure that natural features such as trees and hedges are retained and integrated into any development proposals.

Rural Development & Core Strategy Policy CS11 SPD (August 2014)

3.13 This SPD provides guidance on the interpretation and application of Policy CS11 of the Babergh Core Strategy (2014). Based on the criteria listed within Policy CS11, it is considered that proposals put forward for consideration under this policy should have regard to the following matters:

Site location and relationship to settlement

3.14 Proposals must be in or adjacent to a Hinterland Village. Proposals should be well related to the existing settlement. It is suggested that the starting point for assessing this is whether or not the site adjoins the Built Up Area Boundary (BUAB) of the village. Some sites, even though they adjoin a BUAB, may not be well-related to the village and a judgement will need to be made, taking into account issues such as:

- Whether the proposal would constitute ribbon development on the edge of the village;
- How the site is connected to the existing settlement, jobs, facilities and services, including location of site access and availability of sustainable transport links;
- The scale, character and density of the proposal in relation to the existing adjoining development;
- Whether the proposal constitutes a logical extension of the built-up area of the village; and
- Whether the proposal is self-contained and has logical, natural boundaries.

Sequential approach to site selection

3.15 When considering the suitability of sites for development, the Council will have regard to, in the first instance, whether there are other available, suitable and deliverable sites within the built-up area of the village. The next preferred location is sites which adjoin the built-up area of the village. Sites that do not adjoin the existing built-up area of the village will only be considered if there is special justification. Preference will also be given to brownfield sites where these are well-located and meet sustainability criteria.

Scale of proposal in relation to existing settlement

3.16 In assessing the proposals, the Council will have regard to the fact that the total number of dwellings allocated to Core and Hinterland Villages by the Core Strategy for the period between

2011 and 2031 is a minimum of 1,050. The size and scale of any proposal should be proportionate to the settlement in which it is located. Because each village is different, it is not possible to prescribe standard proportions of development that would be acceptable. A judgement will need to be made on the basis of the size and character of the village, the services and facilities that are available and their capacity to accommodate further development.

- 3.17 As hinterland villages are generally smaller and have fewer services and facilities, it is expected that proposals for consideration will be smaller scale here. However some hinterland villages may be able to accommodate higher levels of development than others. Proposals for hinterland villages will need to demonstrate that the development can be accommodated without adversely affecting the character of the village and that services, facilities and infrastructure have the capacity to accommodate it or will be enhanced to accommodate it.

Cumulative impact taken with existing commitments or other proposals

- 3.18 The cumulative impact should include existing commitments and other proposals in the same village and cluster where they are likely to have a wider impact, for example in terms of traffic generation, capacity of schools and health services.

Local needs

- 3.19 A key part of CS11 is that proposals should meet locally identified need. This should include an analysis of the number and types of dwelling in the village, an assessment of the need for housing in the village, and the identification of any gaps in provision.

Constraints and impacts

- 3.20 Proposals should have regard to issues such as:

- The impact on the character and appearance of the countryside;
- Environmental issues such as agricultural land quality and access;
- Impact on the historic environment;
- Impact on any nationally or locally designated areas of landscape or ecological importance; and
- Contaminated land.

Babergh and Mid Suffolk Joint Local Plan: Consultation Document (August 2017)

- 3.21 The Babergh and Mid Suffolk Joint Local Plan consultation document sets out the strategy for growth in both Districts, indicating where development will take place up to 2036. Once adopted, the new Joint Local Plan will replace the existing local planning policies for Babergh. The Plan will set out a vision for the area and will include policies and land allocations.
- 3.22 The consultation document proposes potential development sites (SHELAA sites) for Little Waldingfield that are considered technically suitable for development. Views were sought on whether the locations of these sites are considered appropriate for development. Little Waldingfield remains a Hinterland Village in the draft Local Plan's review of the settlement hierarchy, where growth options vary from 5% to 15% of the District's growth.
- 3.23 The consultation document also includes inset maps in Appendix 3 identifying potential development sites, existing settlement boundaries and proposed draft new settlement boundaries, as seen in **Figure 3** for Little Waldingfield.

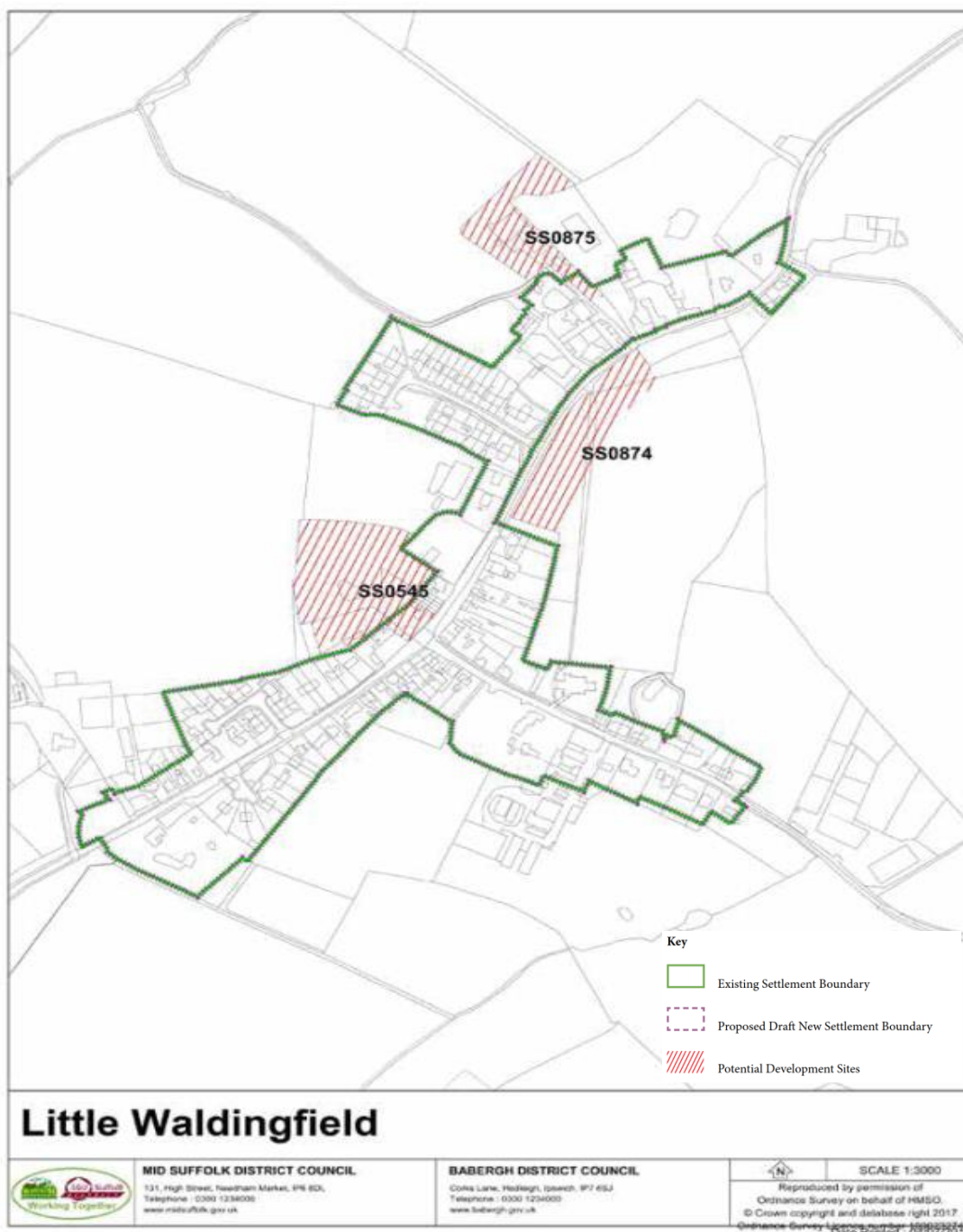


Figure 3 Inset map for Little Waldingfield identifying growth options

3.24 The consultation document was released for consultation (Reg 18) alongside interactive online mapping which identifies SHELAA sites for potential residential development, as seen in **Figure 4** for Little Waldingfield.



SHELAA Sites

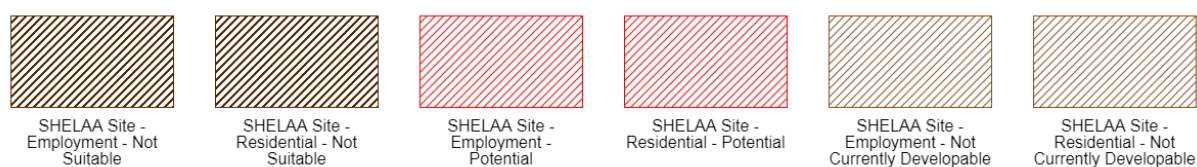


Figure 4 Consultation Map identifying SHELAA sites and existing settlement boundary for Little Waldingfield

Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment (2017)

3.25 An implication of the emerging Local Plan is that Little Waldingfield, and other villages and towns developing Neighbourhood Plans will allocate the development needed through those Plans. However, BMSDC have assessed a number of sites through technical work to support the Local Plan, specifically the Strategic Housing and Economic Land Availability Assessment (SHELAA) (August 2017). The SHELAA considered a total of three sites, as seen in **Figure 4**, for housing within the parish, all of which were assessed for residential development. In August 2017 the Draft SHELAA found that low-density partial development of all three sites would be recommended, in line with the existing settlement pattern, taking identified constraints into consideration.

3.26 In June 2018, BMSDC undertook a comprehensive assessment of these three sites using site assessment pro formas. The assessment found the following:

- Site SS0545 is potentially considered suitable for residential development, taking identified constraints into consideration;
- A low density partial development of the site (linear development along The Street / B1115 only) would be recommended for site SS0874, taking identified constraints into consideration; and
- Site SS0875 is not suitable due to unsuitable access to site and poor connectivity to settlement pattern.

3.27 **Table 1** summarises the key findings of the suitability availability and achievability assessment for the three sites.

Table 1 Summary of key findings of the SHELAA Site Assessment Report (June 2018)

Assessment Criteria	SS0545 (Land west of The Street, Little Waldingfield)	SS0874 (Land to the south east of The Street, Little Waldingfield)	SS0875 (Land to the north west of The Street, Little Waldingfield)
Net Site Area (ha)	0.8	0.78	0.58
Exist Land Use	Orchard and residential garden land	Agricultural	Agricultural land and buildings
Access to Site	Access may be possible from The Street / B1115. This will need further investigation/consultation with the highways authority.	Access possible from The Street / B1115. This will need further investigation/consultation with the highways authority.	No Access to main road - may be possible from the farm track off The Street / B1115, however this is a narrow access point from the main road. Land ownership of the access may also be an issue. Further investigation/consultation with the highways authority would be needed. There are no continuous footpaths to enable safe walking to and from the core services and limited possibilities to improve accessibility.
Landscape, Strategic Gap and Agricultural Land	Agricultural land classification is partly Grade 2 to the north-east and Grade 3 to the south-west. No detrimental impact on local landscape identified.	Agricultural land classification Grade 2. TPO's are identified the length of the western boundary; therefore assessment of impact upon TPOs will be required.	Agricultural land classification Grade 2. No detrimental impact on local landscape identified.
Townscape	Partial or low density development of the site, may have a neutral impact on the townscape. However this would need further investigation to ensure any impact can be mitigated to protect the historic townscape.	Partial development of the site, along The Street/B1115 only, may have a neutral impact on the townscape. However, this would need further investigation to ensure any impact can be mitigated to protect the historic townscape.	Poor connectivity with existing townscape
Biodiversity and Geodiversity	Mature trees and woodland within the site.	There are Tree Preservation Orders along the boundary of the site which runs along the B1115 / The Street.	-
Historic	The site is adjacent to and	The site is within the Little	The site is adjacent

Assessment Criteria	SS0545 (Land west of The Street, Little Waldingfield)	SS0874 (Land to the south east of The Street, Little Waldingfield)	SS0875 (Land to the north west of The Street, Little Waldingfield)
Environment	partly within the Little Waldingfield Conservation Area. The site is located to the rear of Grade 2 listed buildings. The site is also in proximity to County Historic Environment Records. The historic environment will need to be considered to ensure that the impact of the development could be mitigated.	Waldingfield Conservation Area and fronts two Grade 2 listed buildings. The site is also in proximity to County Historic Environment Records. The historic environment will need to be considered to ensure that the impact of the development could be mitigated.	to and partly within the Little Waldingfield Conservation Area. The site is located to the rear of Grade 2 listed buildings. The site is also in proximity to County Historic Environment Records. The historic environment will need to be considered to ensure that the impact of the development could be mitigated.
Open Space	Development of the site would not result in the loss of open space. There is an Outdoor Sports Facility area immediately to the east of the site.	Public right of way passes through the site.	Development of the site would not result in the loss of open space.
Availability	Site is under multiple ownership. Site was submitted by a planning agent on behalf of the landowners. Enquiries have been received for the site. Land available in 0-5 years.	Site is under single ownership - title deeds have been submitted. Site has not been marketed. Land available in 0-5 years.	Site is under multiple ownership - title deeds have been submitted. Land available in 0-5 years.
Achievability	The submission confirms that the site could come forward in 0-5 years. The submission confirms that there are no legal restrictions on the land and no known abnormal costs which would affect viability. The submission does not provide indication of the likely annual build out rate.	The submission confirms that there are no legal restrictions on the land and no known abnormal costs which would affect viability.	The submission confirms that there are no legal restrictions on the land and no known abnormal costs which would affect viability.
Suitability	Site is potentially suitable, but the following constraints have been identified which would require further investigation: - Highways – regarding access, footpaths and infrastructure required - Impact on the historic environment	Site is potentially suitable, but the following constraints have been identified which would require further investigation: - Highways – regarding access, footpaths and infrastructure required - Impact on the historic environment - Tree Preservation Orders along	Site is unsuitable due to access to site and poor connectivity to settlement pattern

Assessment Criteria	SS0545 (Land west of The Street, Little Waldingfield)	SS0874 (Land to the south east of The Street, Little Waldingfield)	SS0875 (Land to the north west of The Street, Little Waldingfield)
		the boundary of the site which runs along the B1115 / The Street. Open Space - public rights of way passes through the site	
Estimated Dwellings Yield	Estimated Dwellings Yield: 8	Proposed Development: 23 dwellings Estimated Dwellings Yield: 12	Proposed Development: 10 dwellings Estimated Dwellings Yield: 8

Conclusions of the SHELAA

3.28 The SHELAA concludes that site SS0874 is potentially suitable, available and viable. This would comprise low density development of an estimated 12 dwellings on part of the site, differentiating from the development approach of 23 dwellings proposed by the landowner. Site SS0545 is considered potentially suitable, available and viable for residential development, taking identified constraints into consideration. Site SS0875 is considered not suitable due to access issues to the site and poor connectivity to settlement pattern.

4. Further Assessment

- 4.1 In line with the findings of the SHELAA Site Assessment Report (June 2018), Sites SS0874 and SS0545 were further assessed with regard to potential for residential development, in terms of the character of the built form and landscape sensitivities of the village. This assessment looks at the likelihood of delivering housing on these sites with respect to the main elements of achieving planning consent under The Town and Country Planning (Development Management Procedure) (England) Order 2015, namely:
- the appearance – aspects of a building or place which affect the way it looks;
 - means of access – the way proposed development links to other roads and pathways outside the site;
 - landscaping – the improvement or protection of the amenities of the site and surrounding area;
 - layout – the way a housing scheme is laid out internally and in relations to buildings and spaces outside the development; and
 - scale – includes information on the size of the development, including density.

Appearance, layout and Relationship to Village Character

- 4.2 The continuation of the built form of Little Waldingfield along The Street, and opposite Grove Avenue, presents a logical progression of settlement growth to the northeast. The development of Site SS0874 is not without its constraints, but presents an opportunity to deliver housing need in line with the character of the village where the built form fronts onto the street. SS0874 is largely a paddock within the Little Waldingfield Conservation Area that is located adjacent to the villages' settlement boundary. The site exhibits high to medium landscape sensitivities from north to south respectively, as views of open countryside and the landmark Grade I listed St. Lawrence's Church dissipate to intimate and contained views of agricultural paddocks and hedgerows.
- 4.3 Site SS0545 is an orchard and residential garden with potential access gained through the curtilage/garden of the Grade II listed 'Enniskillen House' to The Street. The site is largely constrained by trees, while access to the site has the potential to have an impact on the settings of two Grade II listed buildings (not only Enniskillen but also The Swan pub) in very close proximity to the proposed access point. Paragraph 194 and 196 of the National Planning Policy Framework (NPPF) requires a clear and convincing justification for development within the setting of a heritage asset, where harm to the significance of a designated heritage asset should be weighed against the public benefits of the proposal. National policy recognises that heritage assets should be conserved in a manner appropriate to their significance. To minimise impact on the listed buildings, proposed residential development would have to be located to the rear of buildings along The Street, though even this does not rule out an impact on their settings. The erection of dwellings on parts of large gardens attached to existing dwellings is commonly known as backland development. If proposed development is deemed as backland development, the comprehensive development of land behind an existing frontage, it can be found to be acceptable in principle if new housing is in keeping with the character and quality of the local environment.
- 4.4 Although the landowner is providing direct access onto The Street, access would be through the garden of a Grade II listed building, meaning development of the access road would have to be sensitive to its setting. It is unlikely that proposed development would provide a residential aspect onto The Street to integrate with and relate to the existing built form of the village without adversely impacting on the setting of the Grade II listed building and Conservation Area. In this instance, proposed development has the potential to depart from the character of the settlement and existing housing schemes such as those at Croft Lea, Wade Crescent and Grove Avenue, which all provide residential aspects onto The Street.

- 4.5 In accordance with Rural Development & Core Strategy Policy CS11 SPD, proposals in Hinterland Villages should be well related to the existing settlement. Both sites have differing relationships with the village, whereby as stated in the SHELAA partial development of site SS0874, along The Street/B1115 only (see **Figure 5**) may have a neutral impact on the townscape. Site SS0874 has greater potential to achieve a coherent and legible built form that relates better to the village character when compared to Site SS0545 which potentially will not readily contribute to the street to the same extent.



Figure 5 Site SS0874 as viewed from B1115 / The Street

Means of Access

- 4.6 In an area lacking in public transport services, creating proper provision for vehicles is an important part of development proposals both in terms of safety and residential amenity. A two way carriageway with footpath is required for safe access and egress to a housing scheme. This is potentially feasible for both sites. However, proposed access from site SS0545 is directly onto the junction of The Street and Church Road (see **Figure 6**) which would require the approval of the local Highways Authority. A Road Safety Audit may find potential access arrangements onto an existing T junction to be unsafe.
- 4.7 Access plans for Site SS0874 would have to consider potential impacts on trees protected by Tree Preservation Orders along the shared boundary with The Street.



Figure 6 Access is proposed directly opposite the junction of Church Road and The Street

Landscape Impact and Scale

4.8 The Little Waldingfield Neighbourhood Plan Village Character Assessment identifies important views from the Little Waldingfield Conservation Area across the northern tip of Site SS0874 to the Grade I Listed Church of St Lawrence. These views are intermittent of the church framed between trees, hedgerow and shelter belt as viewed from The Street across the northern half of the site as seen in **Figure 7**.



Figure 7 Framed view of the Grade I Listed Church

4.9 Views across the paddock and southern half of the site are contained by the shelter belt, mature trees and hedgerow. A public right of way follows a shelter belt that bisects the northern

tip of the site, creating a natural boundary that allows views of the landmark building to be seen along the public path and from the northern half of the site. Views of the church and open countryside across the northern half of the site contribute to the village character, with views along the public right of way also of high landscape value as seen in **Figure 8**.



Figure 8 View (left) from the Church looking northwards towards the Little Waldingfield Conservation Area and site, and views (right) from the northern part of the site looking towards church and wider countryside.

- 4.10 The shelter belt and public right of way form a logical boundary that have potential to define the developable area to the southwest of the site, when important views across the northern part of the site are considered. This is in line with the SHELAA site conclusions, which considers the partial development of site to potentially deliver 12 dwellings.
- 4.11 Site SS0545 is screened from view by vegetation identified as ‘important trees and hedgerows’ in the Little Waldingfield Neighbourhood Plan Village Character Assessment. Although there are no tree preservation orders present on site, historically the site is an orchard and garden of a Grade II listed building. When considering the setting of the listed building and conservation area, and arboriculture sensitivities of this setting (see Figure 9), the SHELAA considerably reduced the developable area of the site to estimate a lower yield of 8 dwellings.



Figure 9 View of site looking north from rear of listed building

5. Conclusions

- 5.1 The growth strategy for Babergh Council seeks to direct development of 1,050 new dwellings to hinterland villages, such as Little Waldingfield, in accordance with Local Plan policy for the plan period of 2011 to 2031. Proposals for development in Hinterland Villages will be approved where proposals score positively when assessed against Policy CS15 and the Rural Development & Core Strategy Policy CS11 SPD.
- 5.2 An implication of the emerging Local Plan is that Little Waldingfield, and other villages and towns developing Neighbourhood Plans, will allocate the development needed through those Plans. Three sites were identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA) (August 2017) and assessed for suitability for residential development. Two of these sites were considered to be deliverable over the next 5 years, while a third site was considered not suitable for development.
- 5.3 The Parish Council has asked AECOM to undertake an independent and objective comparison of the two sites to add value to the SHELAA findings following a site visit and the drafting of a Village Character Assessment by the Parish Council.
- 5.4 It is clear from BMSDC and AECOM assessments that neither site is free from constraints. However, part development of Site SS0874 is considered to be a more sustainable option when assessed against the core elements of achieving planning consent, namely impact on designated heritage assets, appearance and layout, means of access, landscaping, and scale.
- 5.5 Development of Site SS0874 would have to consider the built and natural heritage implications of the site and surrounding setting. The site contains views of listed buildings and the conservation area across the northern part of the site and multiple TPOs on the western boundary. A reduced developable area, taking these significant heritage constraints into consideration, presents an opportunity to deliver housing need in line with the character of the village where the built form can front onto the street.
- 5.6 The delivery of housing on Site SS0545, the garden and orchard of and behind a Grade II listed building, has the potential to adversely impact on the setting of the listed building, conservation area and the character of the village through development on what is considered as backland. In accordance with Rural Development & Core Strategy Policy CS11 SPD, proposals in Hinterland Villages should be well related to the existing settlement. Site SS0874 therefore has greater potential to achieve a coherent and legible built form that responds more appropriately to the village character when compared to Site SS0545 which will not directly front onto The Street. Notwithstanding this potential departure from the village character, national and local policy encourage the preservation, enhancement and retention of a curtilage area and/or setting which is appropriate to the listed building and the relationship with its setting. In this respect development of site SS0545 would be contrary to Local Plan policy CN06 Listed Buildings. National policy also requires that proposed development respects those features which contribute positively to the setting of a listed building. In accordance with national policy, however, proposed development would require a clear and convincing justification setting out where harm to the significance of a designated heritage asset should be weighed against the public benefits of the proposal. Means of access for both sites would have to be created or significantly upgraded from The Street. Proposed access for Site SS0545 has the potential to have an impact on the setting of the Grade II listed building in addition to raising road safety concerns due to being located opposite a road junction. An upgraded access would require traffic safety measures such as traffic lights or roundabout to mitigate right of way and safety issues. Access plans for Site SS0874 would have to consider potential impacts on Tree Preservation Orders along the shared boundary with The Street.

Deliverability

- 5.7 After further assessment of the two suitable SHELAA sites, part development of site SS0874 is considered to be more favourable when assessed against the main elements of achieving planning consent. The delivery of housing on site SS0545 is largely constrained by national and

Local Plan policy, impact on built and natural heritage assets, and the need for increased road safety infrastructure.

Next Steps

- 5.8 As part of the site selection process, it is recommended that the Neighbourhood Planning Group discusses site viability with BMSDC. Viability appraisals for Site SS0874 and Site SS0545 may already exist. If not, each landowner or developer should be contacted to request evidence of such.
- 5.9 Following this, it is suggested that the Neighbourhood Plan group use all the information available, and community consultation (which should exclude any parties with landownership interests) should be undertaken to select the preferred option to make up any potential housing requirement for Little Waldingfield in the emerging Local Plan.
- 5.10 The site selection process should be based on the following:
 - The findings of this assessment;
 - Discussions with BMSDC including infrastructure requirements; and
 - Local criteria that can be applied to differentiate between the suitable sites, in particular the extent to which the sites support the vision and objectives for the Neighbourhood Plan.

