

Neighbourhood Plan Update: Policy WHB 11 – Buildings and Structures of Local Significance

Consultation on the Draft Neighbourhood Plan took place between 4th November and 22nd December 2023. Consultation responses in respect of the Draft List of properties for inclusion in Policy WHB 11 – Buildings and Structures of Local Significance (Non-Designated Heritage Assets) were extended until 5th January 2024.

This section of the Draft Neighbourhood Plan, which looks at Buildings and Structures of Local Significance, was developed in response to previous surveys of the village, where 85% of the respondents said that enhancing existing heritage and historic assets was important, and 95% said it was important that new development should respect the local character. It is important to note almost 300 properties within the village responded, a very significant response.

At its meeting on 11th January, the public forum session in the meeting focussed on concerns and questions raised by residents about the draft list of Non-Designated Heritage Assets (NDHA's) included in Wickhambrook's Draft Neighbourhood plan, which was open to consultation in December last year (Min. 24.01.05 refers – excerpt attached as **Appendix A**).

The NPWG met on 22nd January '24 to review (specifically) responses from the consultation on the Draft Neighbourhood Plan relating to the draft list of properties for inclusion in policy WHB 11.

At this meeting, the parish council's appointed planning consultant for the preparation of the Neighbourhood Plan, Ian Poole of Places4People, confirmed that:

- The assessment criteria which the NPWG had used in drawing up a draft list of properties for inclusion in Policy WHB 11 reflected the guidance of Historic England in its document [Local Heritage Listing: Identifying and Conserving Local Heritage - Historic England Advice note 7 \(Second Edition\)](#).
- The consultation which the parish council undertook for those included in the draft list of properties for inclusion in Policy WHB 11 met both:
 - the legal requirements and
 - Historic England Guidance at paragraph 33

Having considered the many comments made and concerns raised during the consultation period and subsequently at the parish council meeting on 11th January about properties listed in WHB 11, the Neighbourhood Plan Working Group agreed that it wishes the parish council to consider removing the draft list of proposed properties in WHB 11. However, it respects the wishes of residents in previous surveys as expressed in the consultation on the draft plan and has asked that appropriate statements be added to the neighbourhood plan, (yet to be determined), that will reinforce what the plan already says about proposals for new development respecting the character and distinctiveness of the immediate area including the significance of the historic environment and heritage assets.

There has been a substantial response to the consultation on the draft plan, and all the responses (not just those with respect to policy WHB 11) will have to be considered by our planning consultant, referring to any changes in legislation, planning policy and national frameworks, before a final draft plan can be brought back to the parish council for approval. This is not likely to be before the scheduled meeting in April.

Recommendation: Cllr Turner

That the parish council consider asking its planning consultant (Places4People) to:

- i. remove the draft list of proposed properties in WHB 11; and**
- ii. draft appropriate statements to be added to the neighbourhood plan, (yet to be determined), that reinforce what the plan already says about proposals for new development respecting the character and distinctiveness of the immediate area including the significance of the historic environment and heritage assets for approval at a future meeting of the parish council.**

Appendix A24.01.05 **Public Forum – (Open Session)¹. 19:02**

Councillor Mike Lavelle welcomed residents of the parish to the meeting and following confirmation that they had questions about the Non Designated Heritage Assets (NDHA's) list which formed part of the Draft Neighbourhood Plan, introduced a slide show with background information on NDHA's, how they had been included in the draft list in Wickhambrook and the way forward before inviting questions from the floor.

Questions (in bold) and comments from members of the public are summarised below with any response

- Concern that one of the impacts of being included in a draft list of NDHA's would be the depressed value of individual properties
- Concern that inclusion of a property on the draft list would constrain a property owner in their ability to make changes to their properties
- **How many people responded to the Household Survey?**
Cllr Turner advised that 289 responses were received out of 535 properties consulted
- **Who was the consultant appointed by the parish council?** Places4People
- **What was the criteria used when preparing the list?**
The clerk confirmed that the Historic England criteria had been used by the NPWG, and their findings against each criteria summarised on the schedule provided in respect of each property included on the draft list:
 - Archaeological interest
 - Architectural interest
 - Artistic interest
 - Historic interest

The clerk summarised the NP consultation process and future opportunities for residents to express their views on the preparation of the draft NP and the list of NDHA's within that, confirming that:

 - The NPWG would consider all responses to the consultation on the draft NP by late January
 - A report, summarising comments and setting out any proposed amendments to the list of NDHA's published in the Draft NP consultation, would be considered by the parish council at an extraordinary meeting of the parish council on 1st February
 - A further report, summarising responses to the Draft NP consultation and setting out any proposed amendments to the the Draft NP (which may include any further changes to the draft list of NDHA's following the extraordinary meeting, would then be considered by the parish council at its next scheduled meeting on 29th February (or later if need be).
 - The approved draft plan would then be passed to West Suffolk who would undertake their own six week consultation.
 - The plan would then be sent to a planning inspector, who would have access to all the submissions and responses to consultation before approving a final version of the draft plan.
- Concern by a member of public on how parish council and NPWG had consulted on the draft list. Referring to Section 33 [Local Heritage Listing: Identifying and Conserving Local Heritage \(historicengland.org.uk\)](https://www.historicengland.org.uk) in their view they had not been consulted.
- **Were property owners going to be compensated?**
There is no mechanism for compensation to property owners where the value of a property listed as an NDHA is deemed to be lower than had it not been listed. The impact of planning on property is not a material consideration.

¹ The period of time designated for public participation at a meeting in accordance with standing order 3(e) shall not exceed 15 minutes unless directed by the chairman of the meeting.

Member of public left.

- 3 more elderly residents who were unable to attend the meeting were reported to be concerned that they would not be able to make the changes to their property that would enable them to stay in their own homes.

- A planning permission at Ashfield Green had already been refused on the basis that the parish council had included a neighbouring property in its draft list of NDHA's. Cllr Lavelle explained that the parish council could not comment on particular planning applications.

The clerk advised that that particular planning application had been determined in June, before the NPWG had started work on preparing a draft list of NDHA's. She further explained that when considering a planning application, West Suffolk applies the criteria set out in Historic England's guidance, and if a particular property meets the criteria to be designated an NDHA, the relevant local policies and National Planning Policy Framework paragraphs are taken into account in determining a planning application.

- **Why was the Greyhound Public House no longer included on the draft list of NDHA's?**

Cllr Couzens confirmed that the Greyhound Public House and Twenty-One was listed as a Community Asset within the Draft Neighbourhood Plan.

- **Were any properties of councillors included in the draft list?**

Councillor Lavelle confirmed that his property, Moor Green Farm was included in the draft list and that he had not objected to this.

- If the draft list of NDHA's it is just a suggestion, should it not have gone through the consultation process. Was there a way of simplifying to find common ground?

- **What would be the legal status of the list of NDHA's?**

The clerk advised that, if a Neighbourhood Plan is made following a referendum, all the policies within that plan would be a material consideration for the planning authority (West Suffolk) when determining any planning application.

- **Planning policy guidance implied that designation as an NDHA would be a rarity, why had so many properties been included in the draft list?**

Cllr Lavelle advised that the NPWG, a volunteer team within the community, had followed the guidance of the parish's planning consultant, when identifying a draft list for inclusion in the Neighbourhood Plan and emphasised that the group were all working to do their best to protect the village.

A member of the public responded to say that everyone who lives in Wickhambrook contributed to the village.

- **Would the parish council apologise for how the process has affected residents?**

Cllr Lavelle personally apologised for the uncertainty that the process had had on some residents of the parish who had been included on the draft list and stated that the parish council now had an opportunity to correct.

- **How much was the consultant paid?**

Cllr Lavelle advised that consultant fees had been paid from the grant funding received.

The meeting asked the clerk to forward a copy of the draft minutes to the NPWG in time for their next meeting.

Cllr Lavelle having explained that the meeting was public and anyone could stay for the duration of the meeting, the public forum was closed at 19:57pm and Members of the Public left the meeting.