



Playford Neighbourhood Plan Referendum

Summary of Representations

This document contains summaries of the representations made in response to the consultation on the Submission Playford Neighbourhood Plan which was held between 10 November 2023 to 19 January 2024. The representations were submitted to the Examiner for consideration during the Examination of the Playford Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/playford-neighbourhood-plan/>

Respondent	
Anglian Water	Anglian Water has no comments to make about the Playford Neighbourhood Plan Submission Version.
East Suffolk Council	<p>East Suffolk Council supports preparation of the Playford Neighbourhood Plan. It is noted that some of the issues raised during the regulation 14 consultation have been addressed, but there are still some outstanding amendments.</p> <p>Policy PFD1 – Playford’s Clusters East Suffolk Council still has reservations about this policy because Local Plan policy SLP5.4 does not permit neighbourhood plans to identify clusters. Policy wording makes it seem that there are no other clusters, but SCLP5.4 was not intended for this.</p> <p>Paragraph 5.7 should be amended to explain that the ‘Housing Clusters and Residential Development in the Countryside’ SPD provides guidance on how a judgement should be made.</p> <p>Maps 5 and 6 should be amended with thinner red lines that can be read more easily. There is also inconsistency in the way red lines are shown.</p> <p>Policy supports development within clusters, but the supporting text states that there is very unlikely that opportunities for</p>

development existing within the Brook Lane Cluster, which is a discrepancy.

The red line maps 5 and 6 includes areas defined as meeting criteria of Suffolk Coastal Local Plan policy SCLP5.4. However, the neighbourhood plan also defines red line as the border of the cluster. Determining the cluster is only the first part and must be read in conjunction with the criteria.

PFD6 – Design Considerations

Part i) exceeds the requirements in the Suffolk Parking Standards Guidance (2023) but its reasons are not clear. Amend policy to state that development should meet the charging point requirement and that any extra will be supported.

Page 9, paragraphs 3.2

NPPF text is still 2011 version.

Page 9, paragraph 3.5

Rural Development SPD is still undergoing consultation. Refer to adopted Historic Environment SPD and Healthy Environments SPD, which is being prepared.

Policy PFD2 – Area of Greater Landscape Value and Sensitivity

Commends landscape policy evidence base. Supports use of special landscape area designation as basis for evidence base.

Page 16, paragraph 6.9

Does the Area of Greater Landscape Value and Sensitivity refer to policy PFD2?

Bullet pt 3 – Change wording from un-designated to non-designated.

Policy PFD3 – Protection of Important Views

Policy text does not define detrimental visual impact.

Policy PFD4 - Protection of Trees, Hedgerows and other

Natural Features Delete unneeded 'and' from opening sentence.

Page 21, paragraph 7.2 – Text should specify grade of listing for each building.

Page 21, paragraph 7.5 – Amend text to refer to East Suffolk Council, not just 'Council's Heritage Team'.

Page 21, paragraph 7.7 – Final few words on following page.

Page 22, paragraph 7.8 – Identify who identified each property.

Page 24, paragraph 8.1 – Text should define ‘significant’. Policy could support a development that is significant relative to Playford.

Page 24, paragraph 8.4 – Amend first sentence to read ‘consideration of site and its **context...**’

Page 24, paragraph 8.5 - Correct error: ‘The Guidance Notes that provides a structure...’

National Design Guide and National Model Design Code aren’t relevant.

Page 26 – General Design Guidelines for New Development

Bullet pt 3 – Correct to read ‘Harmonise with and enhance the existing settlement...’

PFD6 – Design Considerations

b) The policy and Design Guidance and Codes fails to identify ‘significant contribution’, which is problematic. Most development is likely to take place on green land so there is a need to identify ‘important open/green/landscaped areas’.

Page 27, paragraph 8.11 – Revise map to show areas at risk from surface water flooding. Replace ‘will not be permitted’ with ‘supported’.

Page 28, paragraph 8.12 – Delete brackets from SUDs at start of sentence 3.

Page 34, Appendix 1 –

Paragraph 1 – Add ‘s’ to end of defines.

Suggests inclusion of photo of each asset.

Amend table for each NHA to include a row for listing all East Suffolk criteria that the NDHA meets.

Chapter 9 – Services and Facilities

There is a need to consider improvement to cycle and pedestrian access to educational facilities and also whether these will require CIL funding. There is also a need to consider maintenance funding and replacement of old equipment.

	<p>PFD8 – Parish Services and Facilities</p> <p>Para 2 – questions use of word ‘unacceptable’ and suggests ‘significantly negative’ would be better.</p> <p>Community Actions</p> <p>Separate section on infrastructure needed, which lists requirements in order of priority.</p> <p>Maps</p> <p>Discrepancies between cluster boundaries and property boundaries on maps 5 and 6. The Council can assist with preparation of maps. A review of discrepancies is recommended.</p>
Environment Agency	<p>The Environment Agency is unable to review this consultation but has identified the following environmental constraints.</p> <p>Flood Risk</p> <p>There are areas of fluvial flood risk and watercourses within the neighbourhood plan area. The neighbourhood plan area extends into Flood Zones 2 and 3 of the River Fynn.</p> <p>However, provided development avoids these areas there does not appear to be any potential significant environmental effects. Recommends inclusion of policies to cover flood risk. Site allocations and windfall development should both follow the sequential approach.</p> <p>Water Resources</p> <p>Recommends checking capacity of available water supplies. The Water Cycle Study and Local Plan may indicate constraints on water supply.</p> <p>In most places development will be expected to achieve water efficiency of 110 litres per person per day. However, a higher standard incorporating rainwater and greywater should be considered.</p> <p>Flood Defences</p> <p>There are Environment Agency flood defences along the River Fynn. Development within 8 metres of the watercourse will require permits that are separate from planning.</p> <p>Source Protection Zones</p> <p>The Plan includes areas located in source protection zones 1, 2 and 3. These should be considered if development is proposed with reference to the Groundwater Protection Guidance.</p>

Historic England	No comments.
Kesgrave Town Council	Supports Draft Neighbourhood Plan.
Liz Bennett	Opposes further housing development.
Ministry of Defence	New development has the potential to interrupt with operation of the East 2 WAM network. Safeguarding map associated with the East 2 WAM network has been submitted to DLUHC for issue. Presence and height of development and sources of electro-magnetic fields are of particular concern.
National Gas (Avison Young)	National Gas Transmission has not identified any assets that are affected by proposed allocations in the Neighbourhood Plan area.
National Grid (Avison Young)	National Grid has not identified any assets that are affected by proposed allocations in the Neighbourhood Plan area.
National Highways	The neighbourhood plan is remote from the nearest strategic road network. Consequently, the policies are unlikely to impact on the operation of the trunk road network. Therefore, no comment.
Natural England	No comment.
Suffolk County Council	<p>They noted that many of their comments from the regulation 14 consultation had been omitted from the Consultation Statement. They provided a full list of the comments that they had previously submitted which were not accounted for in the Consultation Statement. These related to:</p> <ul style="list-style-type: none"> • Active Travel and Air Quality • Minerals and Waste • Safeguarding and Consultation Area • Natural Environment • Local Green Spaces • Design Considerations • Public Rights of Way • Transport • Community Actions • Design Guidance and Codes • General points • Renewable Energy and, • Policy Map <p>They further noted that their comments relate to compliance of the Neighbourhood Plan with the basic conditions.</p> <p>They reiterated their comments from the regulation 14 consultation in relation to meeting the needs for old people. Suffolk County Council recommended that the plan sets out a positive position towards proposals which contain homes built to those standards, in accordance with footnote 52 of the NPPF</p>

	<p>December 2023. They provided some recommended wording to add to policy PFD6.</p>
<p>Suffolk County Council</p>	<p>The Neighbourhood Plan group updated their Consultation Statement to encompass the Suffolk County Council comments previously missed. Suffolk County Council’s second consultation response is in response to the updated Consultation Statement.</p> <p>They expressed their disappointment that their comments had not resulted in changes to the Neighbourhood Plan. They questioned whether the Neighbourhood Plan group had engaged effectively with Suffolk County Council and gave due consideration to their comments.</p> <p>They made the following further comments:</p> <p>Minerals and Waste</p> <p>Suffolk County Council stated that during the regulation 14 consultation they recommended reference to the Suffolk Minerals and Waste Local Plan (SMWLP) 2020 is included in a similar manner to the Local Plan. They noted that the updated Consultation Statement stated that the Local Plan does not reference the SMWLP which they state is incorrect.</p> <p>They noted that the whole of the settlement of Playford is within the minerals safeguarding/consultation area meaning relevant policies will apply. They also highlighted the location of Playford STW Anglian Water where relevant safeguarding policies will apply.</p> <p>Accordingly, they provided recommended text to be included.</p> <p>Suffolk Guidance for Parking, and Suffolk Design Streets Guide</p> <p>They provided an overview of The Suffolk Guidance for Parking and The Suffolk Design Streets Guide. They recommended that the Neighbourhood Plan references these documents.</p> <p>Policy Map</p> <p>They highlighted once more that they strongly recommend a policy map that displays the policies and relevant information on a single map.</p>

	<p>The updated Consultation Statement found that the change was not necessary. Suffolk County Council refuted this and referenced guidance and policy to support their stance.</p> <p>Community Action 3</p> <p>They highlighted that Playford lacks the street lighting required to implement traffic calming measures in accordance with the action.</p>
Suffolk Wildlife Trust	<p>Suffolk Wildlife Trust has the following comments about policy PFD4.</p> <p>Policy PFD4 – Protection of Trees, Hedgerows and other Natural Features</p> <p>Recommends the policy specifically references the Sinks Valley SSSI, all five County Wildlife Sites and priority habitats.</p> <p>The policy can be strengthened by reference to the national minimum of 10% net gain and could include an aspiration to exceed the national minimum.</p> <p>Supports aspiration to restore and repair biodiversity networks through planting of native trees, hedgerows and woodlands. Could reference the regeneration of woodland.</p> <p>Section about mitigation could be improved by adding the following:</p> <ul style="list-style-type: none"> • Each new building to include a bird and bat box. • Impermeable boundary fences to include hedgehog access. • Further enhancement options such as hedgehog houses, invertebrate boxes and bee bricks should be widely considered. <p>Welcomes inclusion of swift boxes in text. Provision could also be made for other species, including starling, house sparrow and barn owl. Boxes integrated into buildings should follow BS 42021: 2022.</p> <p>Text about replacing hedgerows lost to new access could be improved to ‘species-rich native hedgerow’ replaced at a ratio of 2m planted for every 1 m removed. This will provide additional hedgerow and support Community Action 1.</p> <p>Community Action 1 – Wildlife Corridors</p>

	<p>Supports cooperation with neighbouring parishes re wildlife corridors. These can be mapped and shared with neighbouring communities.</p> <p>In support of Playford Neighbourhood Plan Aspiring to Deliver 20% Biodiversity Net Gain</p> <p>It is anticipated that 10% biodiversity net gain will be required from November 2023 on larger developments and from Spring 2024 for smaller developments.</p> <p>Other neighbourhood plans include wording supporting 20% biodiversity net gain and this could work in Playford too.</p> <p>Suffolk County Council's commitment to deliver an additional 10% of biodiversity net gain in addition to that required suggests that this requirement is feasible.</p> <p>More ambitious Local Plan biodiversity net gain requirements have been supported by viability studies. These include Swale Borough Council Local Plan and the Greater Cambridge draft Local Plan.</p> <p>Therefore, a statement in support of 20% BNG could be included in the Playford Neighbourhood Plan.</p> <p>Delivering 20% BNG ensures a meaningful uplift in biodiversity. This will protect biodiversity assets and ecological networks within Playford and surrounding parishes.</p>
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