

Playford Neighbourhood Plan

Response to all Regulation 14 Consultation Comments received from Suffolk County Council

The Playford Neighbourhood Plan Consultation Statement (October 2023) omitted to address all the comments submitted by Suffolk County Council. This table addresses all the comments submitted. Those rows shaded grey are those included in the Consultation Statement. Playford Parish Council would not have proposed any further changes to the Pre-Submission Draft Neighbourhood Plan as a result of the consideration of all these comments.

Name	Organisation	Comment	Parish Council Response	Changes to Plan
Chapter 3 Planning Policy Context				
	Suffolk County Council	<p>Minerals and Waste</p> <p>Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means that SCC makes planning policies and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan⁹, adopted in July 2020, which forms part of the Local Development Plan.</p> <p><i>Chapter 3 Planning Policy Context</i></p> <p>We note that there is no mention of the Suffolk County Council Minerals and Waste Local Plan 2020 in Section 3. This should be considered within the planning policy context as it forms part of the development plan for the county and "would need to be taken into consideration when proposing development"</p> <p>Therefore, the following wording is proposed to follow paragraph 3.5: <i>"3.6 Consideration should be given to the adopted Suffolk County Council Minerals and Waste Local Plan 2020, which sets out planning policies in relation to minerals extraction and safeguarding, and waste management throughout the county, and forms part of the development plans for the area."</i></p> <p><i>Safeguarding and Consultation Area</i></p> <p>The whole settlement of Playford is within the minerals safeguarding/consultation area. This means that Policy MP10: safeguarding of the Suffolk County Council Minerals and Waste Local Plan 2020 will apply. This area can also be viewed on the Interactive Map of Waste Locations of Interest¹⁰ by enabling the "consultation area" overlay (this can be activated via the tab in the lower right corner).</p>	<p>The comments are noted. It is not considered necessary to amend the Plan given that the Local Plan does not make reference to the Minerals and Waste Local Plan</p>	None

It is also noted that there is a safeguarded site to the southeast of the development, AW148 – Playford STW Anglian Water. Although this is a small water treatment facility which is partially screened by woodland and therefore unlikely to have an impact on development or any of the suggested protected important views, safeguarding policies in the Suffolk Minerals and Waste Local Plan will apply.

Policy PFD2 - Area of Greater Landscape Value and Sensitivity

Suffolk County Council	As paragraph 6.2 notes, the Fynn Valley area of Playford parish used to be designated as SLA in the old Suffolk Coastal Local Plan, a designation that is not carried into the new Local Plan.	Noted	None
	Further, SCC understands that the parish commissioned the “Fynn Valley Landscape Value Appraisal” in 2022 as noted in paragraph 6.8, concluding that the lower Fynn Valley in Playford is of higher value and worthy of designation as an area of Greater Landscape Value and Sensitivity (AGLVS).	Noted	None
	SCC welcomes the suggested area illustrated on Map 7 and anchored in Policy PFD2 - Area of Greater Landscape Value and Sensitivity. SCC notes, however, that Policy PFD2 does not cover development outside AGLVS, which could still impact it as noted in paragraph 6.10. We therefore suggest following amendment: “Development proposals in <u>or adjacent</u> to the Area of Greater Landscape Value and Sensitivity will be permitted only where they: [...]”	The amendment is not considered necessary	None
	SCC notes that typically in Neighbourhood Plans, similar policies have been titled as “Area of Local Landscape Sensitivity (ALLS)” or as “Valued Landscape” and the Neighbourhood Planning Group should consider consistency with other Neighbourhood Plans.	Noted	None

Policy PFD3 - Protection of Important Views

Suffolk County Council	Map 8 and Policy PFD3 are welcomed. We suggest a minor amendment to the second sentence of Policy PFD3, as below: “Any proposed development should not have a <u>significant</u> detrimental visual impact [...]”	The amendment is not considered necessary	None
------------------------	--	---	------

This amendment would strengthen the intent of the Policy.

SCC welcomes the Assessment of Important Views found on the parish website, carried out in February 2023, which provides supporting evidence for the seven identified views, including description, map marker and photo of each.

Noted

None

SCC notes that paragraph 6.4 refers to a study dated 2019 which recommended the extension of the Playford Mere CWS, however, this makes no comments on whether this is being further pursued and SCC requests this is added if it is the case.

Noted

None

SCC queries the terminology used in paragraph 6.10, as current it refers to a Landscape and Visual Appraisal (LVA) and questions whether Landscape and Visual Impact Assessment (LVIA) would be the appropriate reference as these two assessments are rather distinct. LVA refer to the viability of designating areas as valued landscapes, whereas LVIA assess the impacts of proposed developments on designated landscapes.

Noted

None

Policy PFD4 - Protection of Trees, Hedgerows and other Natural Features

Suffolk County Council

SCC notes that Policy PFD4 focuses on natural features, which form, of course, the basis for biodiversity, and as such this policy can be taken as a biodiversity policy, but the focus remains relatively narrow and does not look at the bigger picture, such as the impacts on the functionality of wider ecosystems, when certain features are lost (for example; Loss of connectivity, which is recognised in paragraph 6.17 and Community Action 1 - Wildlife Corridors). The title ("Protection of Trees, Hedgerows and other Natural Features") promises more than the policy provides.

Noted

None

SCC welcome the references to biodiversity net gain (BNG) and the Environment Act 2021 from paragraph 6.14 onwards.

Noted

None

Paragraphs 6.15 and 6.16 set the bar for BNG rather low, instead SCC recommends the amending 6.15 to the following wording:

This is not considered necessary

None

“In Playford, biodiversity net gain should be no less than the national legal requirement, and development proposals that deliver go beyond the national requirement will be particularly supported”.

SCC suggests a minor amendment to paragraph 3 of Policy PFD4, as outlined below:

“Otherwise acceptable development proposals will only be supported where they provide a measurable increase in biodiversity net gain, ~~net gain in biodiversity in accordance with the Environment Act 2021~~, through, for example: [...]”

This amendment seeks to improve the requirement for development proposals to achieve biodiversity net gain, in accordance with the Environment Act 2021.

SCC notes that veteran trees are not mentioned in the Plan and considers that a veteran tree survey should be undertaken for the parish, as this could grant stronger protection for such irreplaceable features and could be support Policy PFD4 - Protection of Trees, Hedgerows and other Natural Features. Furthermore, SCC suggests that a survey of hedgerows to identify important hedgerows under the 1997 Hedgerow Regulations may also be useful.

This is not considered necessary

None

Clarification is sought over the definition of “distinctive tree”. SCC believes that “veteran tree” would be more accurate terminology. Further, SCC recognises that woodlands are not explicitly covered within this Policy. Additionally, we note that wide green verges seem to play an important part in the local character of Playford (paragraph 6.9 and 8.3). Hence, SCC suggests explicit protection of these features under Policy PFD4 through the following proposed wording, as below:

This is not considered necessary

None

“Development proposals should prevent the loss to, or substantial harm to, distinctive veteran trees, ancient woodlands, hedgerows, wide green verges, and other natural features. [...]”

This is not considered necessary

None

The final paragraph of this policy relates to new access or widening of access through hedgerows. SCC would like to note that visibility splays for access should meet current guidance and the Suffolk Design Streets Guide 2022.

Noted

None

Chapter 6 – Landscape and natural Environment

Suffolk County Council	<p><i>Local Green Spaces</i></p> <p>It seems to be a missed opportunity that no Local Green Spaces are proposed to be designated in the Plan. The Playford Design Guidance and Codes document recognises that Playford has several open spaces:</p> <ul style="list-style-type: none"> • Part 1.2 refers to the open space at the Village Hall; • Part 2.2.1 further refers to the playground there, playing fields and the churchyard of St Mary’s Church; and • Part 3.2.4 states that “Playford has several public open spaces located around the village” and provides guidance on their preservation and enhancement, explicitly mentioning the protection of these open spaces. <p>SCC suggests that a Local Green Space policy (aligned with paragraph 101-103 of the NPPF 2021) would be a beneficial improvement to the Plan, supported by a Local Green Spaces site appraisal, thereby ensuring that these important local green spaces are protected from being destroyed as an adverse impact of any development proposals.</p>	There are no green spaces in the Plan Area that meet the NPPF criteria	None
------------------------	--	--	------

Chapter 7 – Historic Environment comments

Suffolk County Council	<p>SCC welcomes the reference to SCCAS and the HER in paragraph 7.3.</p> <p>Additionally, SCCAS have been reviewing Farmsteads throughout Suffolk, as part of an ongoing project funded by Historic England. The Neighbourhood Plan Group may wish to consider whether the information from the Suffolk Farmsteads Project would add any details or information to the Plan. Entries from the project can be seen via the Suffolk Heritage Explorer</p>	Noted	None
		This is not considered necessary	

Policy PFD6 - Design Considerations

Suffolk County Council	<p>Flooding</p> <p>SCC, as the Lead Local Flood Authority, has the responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. The Environment Agency has the responsibility for managing flood risk from main rivers and the coast.</p>	Noted	None
------------------------	--	-------	------

	<p>SCC suggests the following addition into Policy PFD6 in order to provide strength and clarity to the policy: “[...] proposals will be supported where: f. <u>developments are not situated in areas of any form of flooding, and should not result in water run-off</u> would not that would add-to or create surface water flooding, <u>through the incorporation of above ground open Sustainable Drainage Systems (SUDS) that are multifunctional and provide amenity and biodiversity, in accordance with the Suffolk Flood Risk SuDS Local Design Guide 2023² and the Suffolk Coastal Local Plan Policy SCLP9.6 Sustainable Drainage Systems.</u>”</p> <p>Therefore, the following additional wording is proposed to be added to Policy PFD6 Design Considerations: “[...] proposals will be supported where: j. <u>they include the provision of homes that are adaptable and accessible (meaning built to optional M4(2) standards), in order to meet the needs of the ageing population, without excluding the needs of the younger people and families.</u></p>	<p>The policy will be amended as suggested</p> <p>The County Council is aware that the Written Ministerial Statement 2015 precludes neighbourhood plan stipulating these requirements.</p>	<p>Amend part f. of the policy as suggested by the County Council</p> <p>None</p>
Suffolk County Council	<p>Policy PFD6 - Design Considerations</p> <p>We note that Policy PFD6 - Design Considerations refers to landscape character in Part a, and gardens and open spaces in Part b, which is welcome. However, Part b could be strengthened through the following amendment, to include biodiversity as a consideration.</p> <p>“b. they do not involve the loss of gardens, important open, green or landscaped areas, which <u>are valued assets for</u> make a significant contribution to the <u>biodiversity, and make a positive contribution to the character and appearance of that part of the village;</u>”</p> <p>The design policy refers to parking in part d, but should make specific reference to the Suffolk Guidance for Parking 2019¹¹, as follows: “d. in accordance with adopted standards, the safety of the highway network is maintained or enhanced, ensuring that all vehicle parking is provided within the plot and that spaces and garages meet the adopted minimum size standards <u>as set out in the Suffolk Guidance for Parking 2019 or any successor documents;</u>”</p>	<p>This is not considered necessary</p> <p>This is not considered necessary</p>	<p>None</p> <p>None</p>

Part g of this policy refers to cycle storage in accordance with cycle parking guidelines, which is welcomed. However, this policy would be strengthened by amending as follows:

“g. adequate provision for the covered storage of all wheelie bins and secure cycle storage is made, as appropriate and in accordance with adopted cycle parking standards in the Suffolk Guidance for Parking 2019 or any successor documents;”

This is not considered necessary

None

It is noted that there is the lack of opportunities for public transport and sustainable travel in the Plan, due to the rural nature of the village, and this would require more consideration before any significant development is proposed on how to promote non-motorised trips on the network. Therefore, it is suggested that Policy PFD6 could include specific support for active travel, as follows:

“j. active and sustainable travel measures are created and/or enhanced within new developments.”

Given the limited development expected in Playford, this is not considered appropriate

None

Policy PFD7 - Artificial Lighting

Suffolk County Council

SCC recognises that Policy PFD7 - Artificial Lighting is effectively a Dark Skies policy and suggests that the title is reworded to reflect this terminology.

This is not considered necessary

None

Chapter 8 – Development Design comments

Suffolk County Council

Regarding paragraph 8.11, any proposals within areas of surface water flooding risk may be subject to Lead Local Flood Authority consideration at the planning stage.

Noted

Regarding paragraph 8.12, the following amendments are proposed: “In terms of surface water flooding, there are more areas of the village centre, ~~in particular,~~ that are prone to flooding as a result of heavy rain. Sustainable Drainage Systems (SuDS) can help manage the impact of development on flooding by providing an alternative to the direct discharge of surface water through networks of pipes and sewers to nearby watercourses. ~~They~~ SuDS that are designed to manage and use rainwater close to where it falls, on the surface and incorporating vegetation, tend to provide the greatest benefits. Most SuDS schemes use a combination of SuDS components to achieve the

The paragraph will be amended as suggested.

Amend para 8.12 as suggested by the County Council

overall design objectives for the site. store and/or re-use surface water at the source; decrease flows to watercourses until such a time as there is capacity in the system; and improve water quality.

Adaptable homes and an ageing population
SCC welcome the population data supplied in paragraph 2.1.3 of the Design Guidance and Codes and suggest referring to Suffolk Observatory³ for more recent data. Suffolk Observatory shows a mid-2020 estimate population for Playford of 249. Of these, 22% of residents are aged 65+ which is above the England average of 18.5%.

Noted

None

With respect to the population data, it is important to ensure the needs of all residents are catered for, recognising the likely increase of co-morbidities as people get older. It is suggested that there could be provision for homes that are adaptable to M4(2) standards. This can help meet the needs of elderly and frail residents, allowing them to maintain independence for longer, but without restricting younger people and families. Therefore, SCC welcome part 3.5.3 of the Design Guidance and Codes but recommend including some wording within the Neighbourhood Plan itself. We suggest that the following could be added after paragraph 8.4 of the Plan:

Within the wider mix of dwellings on housing developments, support will be given for the provision of homes that are adaptable and accessible (meaning built to optional M4(2) standards), in order to meet the needs of the ageing population, without excluding the needs of the younger people and families.

The County Council will be aware that the Written Ministerial Statement 2015 precludes neighbourhood plan stipulating these requirements.

None

We suggest an inclusion, in the supporting text, for the needs of residents who are living with dementia in the community, and the potential for making Playford a "Dementia-Friendly community"⁴. The Royal Town Planning Institute has guidance on Town Planning and Dementia⁵ and for Neurodiversity⁶ (to support those with learning difficulties) which may be helpful in informing policies.

This is not considered necessary given the size of Playford.

None

This is not considered necessary

Health and Wellbeing
We welcome the mention of "health" in paragraphs 6.5, 6.9, 8.7 and the reference to use of the Building for a Healthy Life Toolkit in the

None

Design Guidance and Codes. SCC would suggest including a paragraph referencing the Toolkit within the Plan to further support the health and wellbeing strategy. We suggest the following wording after paragraph 8.4:

Development proposals should be accompanied by a Building for a Healthy Life Assessment⁷ that determines how the development contributes to the quality of Playford as a place to live.

Policy PFD9 - Public Rights of Way

Suffolk County Council	<p>SCC welcomes Policy PFD9 as it recognises the potential value of public rights of way for biodiversity and support the ask to enhance their biodiversity as part of development proposals seems reasonable and justified.</p> <p>SCC welcomes Policy PFD9, however, we wish to highlight that the link between improving and extending the existing PROW network with biodiversity corridors can lead to on-going maintenance issues with vegetation growth as highlighted by residents and captured in paragraph 10.10. It should be noted that PROW in open corridors dry out better, providing year-round use, compared to those within vegetated, and consequently shaded, corridors.</p>	<p>Noted</p> <p>This is dependent upon soil conditions</p>	<p>None</p> <p>None</p>
------------------------	--	--	-------------------------

Community Action 3 - Traffic Calming

	<p>SCC acknowledges this community action, and will welcome engagement from the community. Please note that traffic calming is not considered suitable for A and B class roads, bus routes, or roads with inadequate street lighting.</p>	<p>There are no A or B class roads in Playford</p>	<p>None</p>
--	---	--	-------------

Community Action 4 - 20mph speed limits

	<p>SCC notes that there is a desire to implement a 20mph limit to the village as noted in Community Action 4, the following criterion originate from SCC 20mph speed limit policy ^{12;13}.</p> <p>Unless in exceptional circumstances, locations will not be considered for 20mph schemes where any of the following apply:</p> <ul style="list-style-type: none"> • they are on A or B class roads; 	<p>Noted</p>	<p>None</p>
--	--	--------------	-------------

- they have existing mean speeds above 30 mph;
- there is no significant community support as assessed by the local County Councillor.

Locations will then only be considered for 20 mph limits or zones if two out of three of the following criteria are met:

- current mean speeds are at or below 24 mph;
- there is a depth of residential development and evidence of pedestrian and cyclist movements within the area;
- there is a record of injury accidents (based on police accident data) within the area within the last five years.

Community Action 5 - HGVs

We acknowledge the concern of HGVs travelling through the village. Please note that there are two types of weight restrictions used on roads in Suffolk; environmental weight restrictions and weak bridge restrictions¹⁴.

Noted

None

SCC has recently undertaken a review of recommended lorry routes through Suffolk, which is displayed on a map¹⁵. This map shows the closest recommended access route is through Kesgrave. This does not however prevent lorries from using other roads within the county, as they may be required for access to facilities in the surrounding villages.

10. Highways and Travel

Suffolk County Council

Active Travel and Air Quality

SCC welcome the mention of active travel within the reference to the Manual for Streets on page 9 of the Design Guidance and Codes and the sentiments of paragraph 10.7 of the Neighbourhood Plan. We recommend an addition between paragraphs 10.8 and 10.9, to include implications to Air Quality, with the following wording, under a new heading of Active and Sustainable Travel:

Noted

None

"Active and Sustainable Travel

10.9 It is important to improve air quality and mitigate any risk to human health due to man-made emissions such as nitrogen oxides and particulate matter. Encouraging and facilitating active and sustainable

This is considered more appropriate to an urban area

None

<i>travel can reduce vehicles on the road and therefore pollution and poor air quality, as well as improve people's mental and physical health."</i>	rather than a small village such as Playford	None
Further, for the Neighbourhood Plan Group to consider – SCC believes that new developments should enable residents and users to move in and around the village using non-motorised forms of transport, including those with limited mobility. This can be done by addition of benches, including 'Chatty Benches' ⁸ . This could help to make an elderly population feel more included as part of the community and reduce isolation of vulnerable groups. It is suggested that this could be a Community Action.	Given the limited development expected in Playford, this is not considered appropriate	None
SCC notes paragraph 10.4, which states that Neighbourhood Plans "have little power to introduce highway improvements". Neighbourhood plans can provide significant weight to support County and District Councils in obtaining CIL and Section 106 funding and reaching Section 278 agreements with developers to fund highway improvements, thus bringing in external resources.	Noted	None
SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe as well as providing and managing flood risk for highway drainage and roadside ditches.	Noted	None

Other comments

Suffolk County Council	<p>Thank you for consulting Suffolk County Council (SCC) on the Pre-Submission version of the Playford Neighbourhood Plan. SCC is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:</p> <ul style="list-style-type: none"> - Archaeology - Education - Fire and Rescue - Flooding - Health and Wellbeing - Libraries - Minerals and Waste - Natural Environment - Public Rights of Way 	Noted	None
------------------------	---	-------	------

- Transport

This response, as with all those comments which SCC makes on emerging planning policies and allocations, will focus on matters relating to those services.

Suffolk County Council is supportive of the vision for the Parish. In this letter we aim to highlight potential issues and opportunities in the plan and are happy to discuss anything that is raised.

Where amendments to the plan are suggested, added text will be in italics and underlined and deleted text will be in ~~striketrough~~.

Education

SCC, as the Education Authority, has the responsibility for ensuring there is sufficient provision of school places for children to be educated in the area local to them. This is achieved by accounting for existing demand and new developments. SCC, therefore, produces and annually updates a five-year forecast on school capacity. The forecast aims to reserve 5% capacity for additional demand thus the forecasting below may refer to 95% capacity.

Noted

Early Years

There is no early years provision in Playford, the nearest provision is located in Kesgrave. As this Plan does not specify a number of additional houses, an assessment would have to be made as development comes forward.

Primary Education

Bealings School is currently forecast to exceed 95% capacity in 2023/24 and 2024/25 during the forecast period. However, at the end of the forecast period the school is expected to be at 95% capacity.

Currently, there are no recorded developments of 10 or more dwellings in the catchment area, and no planned developments proposed as part of the Suffolk Coastal Local Plan.

Secondary Education

Kesgrave High School is forecast to exceed 95% capacity during the forecast period. The proposed strategy for mitigating this growth is via the provision of a new secondary school within the Brightwell Lakes development.

Design Guidance and Codes

This is not considered necessary

None

SCC would recommend that the Playford Design Guidance and Codes make specific reference to Suffolk Guidance for Parking 2019 and Suffolk Design: Streets Guide 2022 ¹⁶.

Policy PFD1 refers to Maps 4 and 5, but should refer to Maps 5 and 6. Noted None

There is a graph shown on page 25 of the plan, but as there is no legend/title, figure number, caption, or key, and thus it is not clear what is being displayed. This is not considered necessary None

Renewable Energy
SCC highlights that considering the Climate Emergency (as declared by Suffolk County Council in March 2019¹⁷) all development should be sustainable. SCC notes that there are only brief mentions of renewable energy in the plan, and it is suggested that this concept could be incorporated into policy, along with sustainable design. There could be the specific support for proposals that include sustainable design, including rainwater harvesting, and the inclusion of renewable energy features, such as solar panelling on roofing. This is not considered necessary None

Policies Map
The Playford Neighbourhood Plan does not have a Policies Map. Whilst Maps 1, 7, 8 and 12 do display some of the relevant components of a policy map, none are sufficiently detailed to be classified as the Policy Map for the Plan. There also needs to be a clear Key to assist with identifying the displayed features. This is not considered necessary None

It is strongly recommended that the steering group creates a Policies Map, which clearly displays the important features mentioned within the plan policies in once clear and consolidated image.

This map should display the following: neighbourhood plan area boundary, Clusters boundaries, Listed Buildings and/or heritage assets, important views, public rights of way, the Area of Greater Landscape Value and Sensitivity, and any other important features, services and facilities of the parish.
Inset maps may be used to show closer detailed parts of the parish, where identified features would be lost and/or hard to read on the overall Policies Map.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the SCC's Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources.

Noted

None

The guidance can be accessed here: Suffolk County Council Neighbourhood Planning Guidance.

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.
