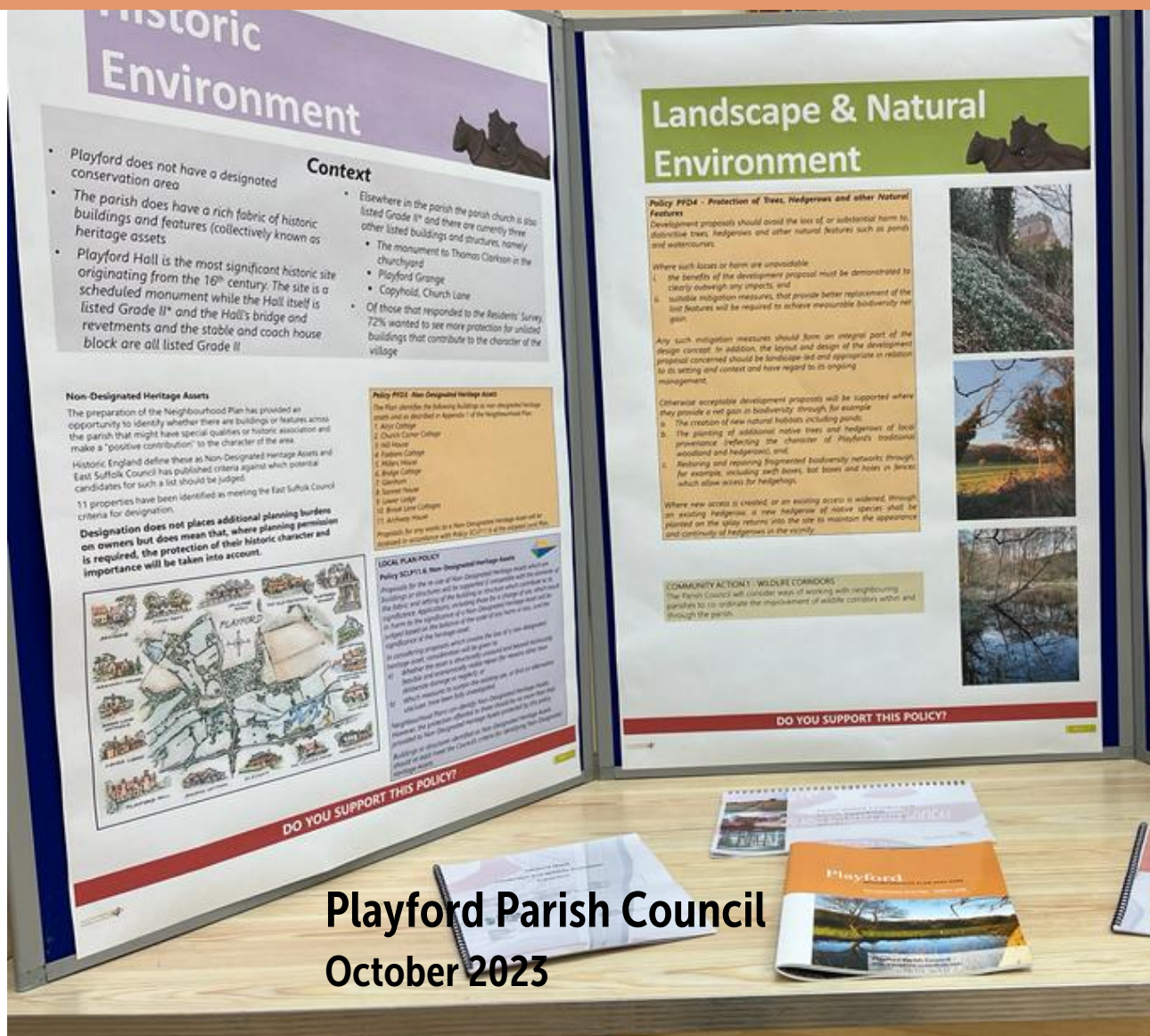


# Playford

NEIGHBOURHOOD PLAN 2023-2036

## CONSULTATION STATEMENT



Playford Parish Council  
October 2023

Prepared for Playford Parish Council by  
Places4People Planning Consultancy  
September 2023

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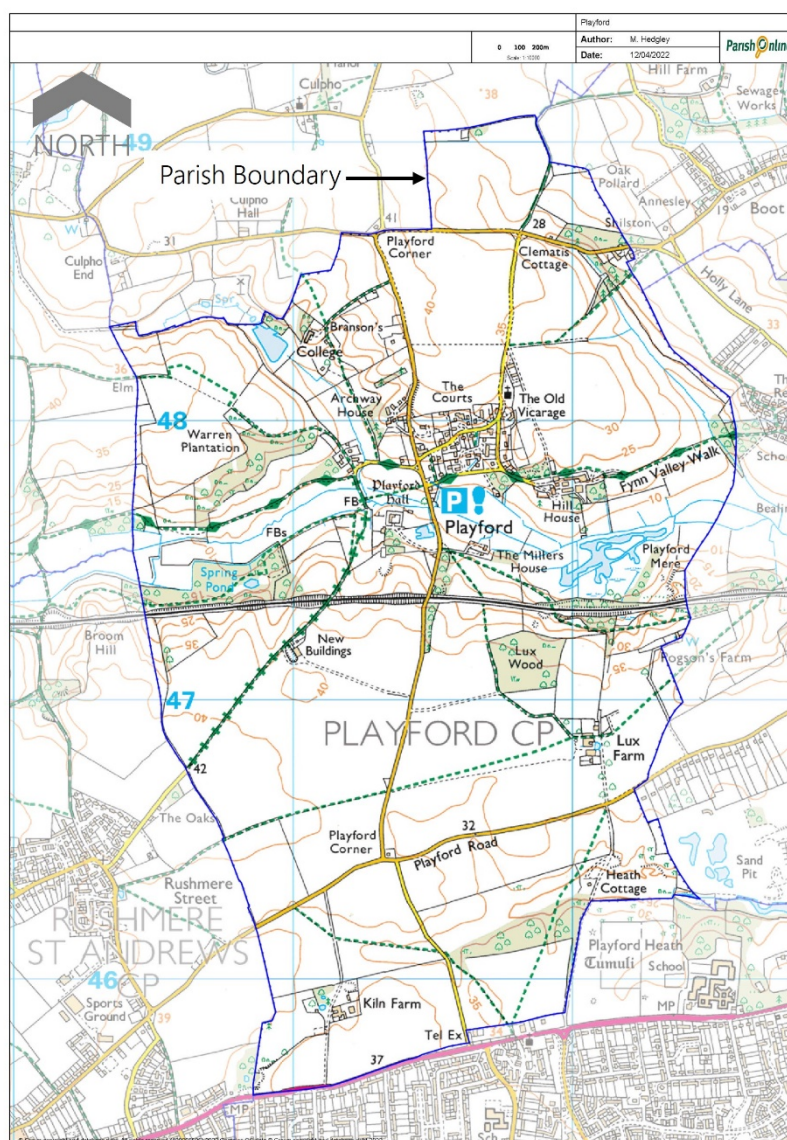
## 1. Introduction

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Playford Neighbourhood Plan.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
- contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted; and
  - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the Neighbourhood Plan are the culmination of extensive engagement and consultation with residents of Playford as well as other statutory bodies. This has included a household survey and consultation events at appropriate stages during the preparation of the Plan.



## 2. Background to the preparation of the Neighbourhood Plan

- 2.1 Playford Parish Council made the decision to produce a Neighbourhood Plan for the parish in August 2016. It was agreed that work would initially be carried out by a group of volunteers and parish councillors and would concentrate on the rich environmental and historic assets of the parish. An application to East Suffolk Council to designate the whole of the Playford parish as the neighbourhood plan area was made in April 2017 and the District Council formally designated the area on 28 June 2017. Map 1 identifies the extent of the Neighbourhood Area.



### 3. How the Neighbourhood Plan has been prepared

3.1 The Neighbourhood Plan has been prepared in accordance with the requirements of the Government's Neighbourhood Planning Regulations and, in particular, has involved local community engagement to gather evidence for the content of the plan and later inform the plan's direction and policies. The content of the Neighbourhood Plan has been generated and led by the community and shaped by results of surveys, drop-in events and externally sourced evidence reports as appropriate and proportionate to the content of the Plan and the matters it addresses.

3.2 The main pieces of work carried out in preparation of the Plan were:

- Residents' Survey 2018
- Fynn Valley Landscape Value Appraisal 2022
- Design Guidance and Codes 2022
- Assessment of Non-Designated Heritage Assets 2023
- Assessment of Important Views 2023

Reports on all these projects are either included as an appendix to the Plan or available separately to download on the Neighbourhood Plan pages of the Parish Council website.

3.3 Work to finalise the draft Plan was hampered by the onslaught of the COVID-19 Pandemic but in January 2023 the Parish Council considered the draft and approved it for the purposes on Pre-Submission consultation in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

## 4. Regulation 14 Pre-Submission Consultation

- 4.1 Consultation commenced on Saturday 18 March 2023 and ran until Friday 5 May. An explanatory leaflet, illustrated in Appendix 1, was published and distributed to every household.
- 4.2 A drop-in consultation event was held at the Village Hall on Saturday 18 March which approximately 25 people attended. The display boards used at the event are illustrated in Appendix 2.
- 4.3 The Neighbourhood Plan pages of the website provided a copy of the Draft Neighbourhood Plan, links to the supporting evidence documents and details on how to comment on the Plan. An online comments form was made available, linked from the Neighbourhood Plan pages. It was also made available in paper form should respondents be unable or unwilling to submit comments online.
- 4.4 The District Council provided a list of statutory consultees, as listed in Appendix 3, and these were notified of the consultation by email at the start of the consultation period. A copy of the consultation email content is included as Appendix 4.
- 4.5 Details of the responses received during the pre-submission consultation period are detailed later in this Consultation Statement.

## 5. Pre-Submission Consultation Responses

- 5.1 A total of 25 people or organisations responded to the Pre-Submission Consultation as listed below.

### Residents

A Cattermole	T Oldfield	A Rickard
H Legard	H Oliver	D & F Scott
B Wale	B Pearson	E Tabecki
G Williams	T Quilter	C Tayleur
L and K Bennett	G Radford	A Trump
J & M Hammond	O Rausch	M Waithe
C & R Moseley	J & J Reed	R Wood
M Newman	J Riches	

### Organisations and Developers

Kesgrave Town Council  
Ministry of Defence, DIO Safeguarding Department  
National Highways  
Natural England  
Suffolk Wildlife Trust  
Anglian Water  
Suffolk County Council  
East Suffolk Council

- 5.2 Appendix 5 of this Statement provides a summary of responses to the consultation questions while the schedule of comments and the responses of the Parish Council are set out in Appendix 6. As a result, the Submission version of the Neighbourhood Plan has been appropriately amended as identified in the “changes made to Plan” column of the Appendix. Further amendments were made to the Plan to bring it up-to-date as well as reflecting the outcome of the Screening of the Plan carried out for Babergh District Council and published in September 2022. Appendix 7 provides a comprehensive list of all the modifications made to the Pre-Submission Plan following consultation.

A NEIGHBOURHOOD PLAN

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for Playford

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your chance to comment

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## Your chance to comment on the Neighbourhood Plan for Playford

Since 2017, the Parish Council has been progressing with the preparation of a neighbourhood plan for the whole parish, illustrated on the map.

A neighbourhood plan is a community-led plan for guiding future development, regeneration and conservation of an area. Being a land use plan there are certain rules and regulations that must be followed during its preparation, but once complete they become part of the legal planning framework for the area.

There is a desire to focus on Playford's natural and historic environment and the Neighbourhood Plan covers the following key themes:

- DEVELOPMENT LOCATION
- LANDSCAPE AND NATURAL ENVIRONMENT
- HISTORIC ENVIRONMENT
- DEVELOPMENT DESIGN
- SERVICES AND FACILITIES
- HIGHWAYS AND TRAVEL

Each theme is supported by one or more policies that will be used in determining planning applications.

We've now reached a major milestone and are commencing consultation on the Draft Plan. Consultation commences on 18 March and will last until Friday 5 May, a period of 7 weeks. It's your chance to say whether or not you support the content of the Plan or would like to see some changes.

The Plan will be available to view online at <http://playford.onesuffolk.net/> from 18 March.

**THE FINAL PAGE OF THIS LEAFLET EXPLAINS HOW YOU CAN COMMENT.**

**It is important that you use this opportunity to have your say, even if you're fully supportive of the Plan.**

## VISION

In 2036, residents in Playford will enjoy a high quality of life with improved access to local facilities and services, and to the countryside within and around the parish. Built and natural heritage assets are conserved and enhanced by the sensitive siting and design of any new development.



The Vision is followed by a series of planning policies relating to the key themes.

### DEVELOPMENT LOCATION

The Plan does not allocate new sites for development, but recognises that there are some 'clusters' of existing residential development, as shown on the map, that may be suitable for limited infilling, so Policy PFD1 'Playford's Clusters', states infill development may be acceptable within the defined clusters.

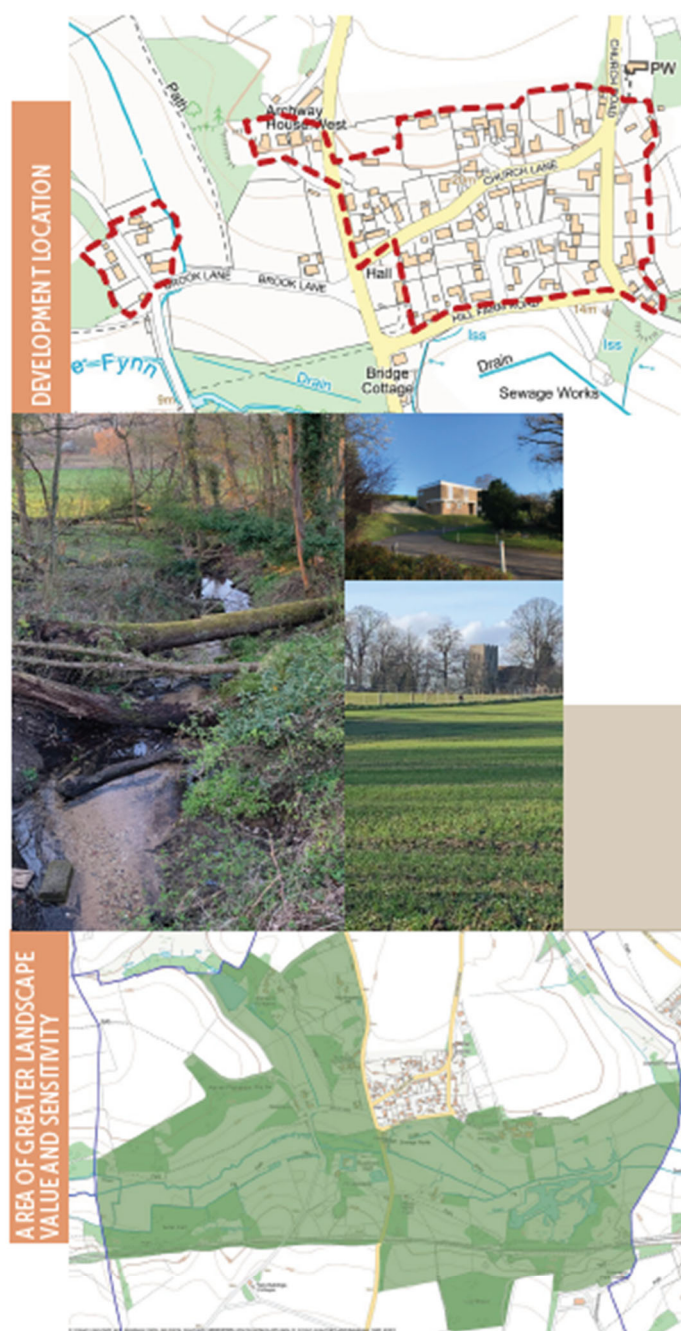
### LANDSCAPE AND NATURAL ENVIRONMENT

The built-up area of Playford nestles on the valley side of the River Fynn. Consequently the landscape and natural environment is a key theme in the Plan. Policy PFD2 defines an Area of Greater Landscape Value and Sensitivity focused on the valley, as illustrated, to ensure the special qualities of the landscape are retained and Policy PFD3 identifies seven important views from public vantage points, so that any proposed developments do not have a detrimental visual impact on the village or its setting.

Trees, hedgerows and other natural features are specifically mentioned for protection under Policy PDF4. Likewise proposals that provide a net gain in biodiversity are to be supported.

### HISTORIC ENVIRONMENT

Playford is rich in historic buildings and monuments which are protected through national designations. Locally, the Plan identifies a further 11 locally important buildings as non-designated heritage assets under Policy PFD5. The designation does not place additional planning burdens but does mean that, where planning permission is required, the protection of their historic character and importance will be taken into account.



- The properties are:
- |                          |                         |
|--------------------------|-------------------------|
| 1. Airys Cottage         | 6. Bridge Cottage       |
| 2. Church Corner Cottage | 7. Glenham              |
| 3. Hill House            | 8. Sonnet House         |
| 4. Foxboro Cottage       | 9. Lower Lodge          |
| 5. Millers House         | 10. Brook Lane Cottages |
|                          | 11. Archway House       |



### DEVELOPMENT DESIGN

You told us that design of development is important, so Policy PFD6 Design Considerations, sets out 9 matters to be taken into account which, together with the Neighbourhood Plan Design Guidelines, provide comprehensive guidance for new developments. Dark skies are preferred over streetlights, so Policy PFD7 limits the use of Artificial Lighting where planning permission is required.

### SERVICES AND FACILITIES

Local facilities and services are also valued by residents so Policy PFD8 seeks to ensure three key facilities are retained:

- i. The Village Hall
- ii. The Play Park
- iii. Kesgrave Allotments, Playford Lane, Rushmere St Andrew

### HIGHWAYS AND TRAVEL

The impact of traffic is high on the concerns of residents but there is little that planning policies can do about speed and volume. The Plan does contain "community aspirations" to try and get the County Council to address these concerns. Playford is fortunate to have a good network of footpaths and other rights of way, providing access to its high quality surroundings, so it is important opportunities to improve and extend these are utilised through Policy PFD9.

### HOW TO COMMENT

To view the Plan go to <http://playford.onesuffolk.net/> or if you would like to borrow a paper copy for a short time please contact:

Marian Hedgley, Parish Council Clerk 01473 738468  
Joan Metcalfe, Parish Council Chair 01473 623003  
or telephone 07879 877480 between 9.00am and 5.00pm

During the consultation period the Neighbourhood Plan website will have an online comments form which you can complete.

You can also collect a paper response form at the Drop-in Event or by contacting the above. The form explains how you can return them.

**COMMENTS MUST BE RECEIVED  
BY FRIDAY 5 MAY.**

**WE CANNOT ACCEPT  
COMMENTS AFTER THIS TIME**

## Drop-in Event

We'll be at the Village Hall on Saturday 18 March between 10.00 and 13.00 where you'll be able to find out more about the Plan and talk to members of the Working Group.



**We want your comments,  
even if you support  
everything in the Plan.**

Playford Parish Council supported by

**PLACES 4 PEOPLE**  
PLANNING CONSULTANCY

## Appendix 2 – Drop-in Event Display Boards

# Welcome



### The story so far

- Since 2017 the Parish Council has been progressing the preparation of a Neighbourhood Plan for the parish.
- Progress was hampered by available volunteer time and COVID but we've now reached a major milestone and are commencing consultation on the Draft Plan.
- Consultation lasts until Friday 5 May, a period of 7 weeks.
- This exhibition provides a brief summary of the Plan, illustrating the planning policies and proposed community actions that are in the Plan.
- We welcome your feedback by submitting your comments, even if you fully support the Plan.

### What is a Neighbourhood Plan?

It is a relatively new kind of planning document designed to allow local people to play an active part in planning their area.

When complete, the Plan will form part of the statutory development plan for the area, meaning East Suffolk Council and Planning Inspectors will have to take note of what it says when considering planning applications.



Over the next 7 weeks you have an opportunity to read the Plan and submit your comments.

The boards that follow provide information about the Plan.

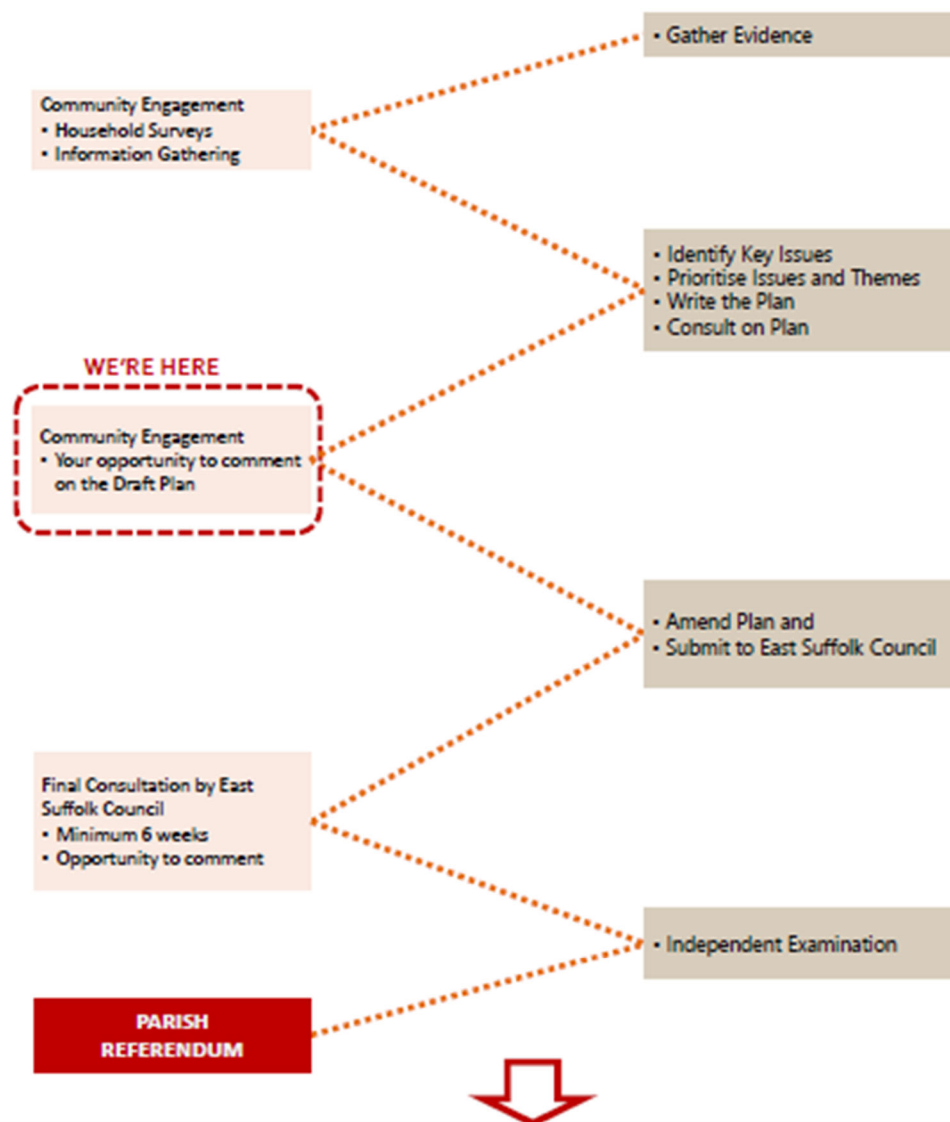
**WE NEED YOUR VIEWS BY 5 MAY**

# Process



## How the Plan is prepared?

There are a number of stages that have to be completed, as illustrated. Some of these stages are governed by the regulations for preparing neighbourhood plans and so there is no short cut.





# The Draft Plan



## Plan Contents

The Plan itself is a large document and necessarily quite complex in places as it will be used to decide whether planning applications should be approved.

Based on the issues identified during the initial stages of preparing the Neighbourhood Plan, the following themes have been identified but would urge you to view the Plan as a whole.

- **Development Location**
- **Landscape and Natural Environment**
- **Historic Environment**
- **Development Design**
- **Services and Facilities**
- **Highways and Travel**

### The Plan contains:

#### Planning Policies

These will be used to supplement the Local Plan when decisions on planning applications are made.

Planning policies can only cover matters that would require planning permission, so they can't, for example, tackle speeding.

#### Policies Maps

These illustrate areas of land or buildings where policies in the Plan apply.

#### Community Actions

Local initiatives to address non-planning matters and concerns raised in the Household Survey.



Neighbourhood Plans cannot contradict the main government planning policies or the strategic policies in the Local Plan for the area. For example, they cannot propose less development than is planned for in the adopted Local Plan.

**WE ESPECIALLY WANT YOUR COMMENTS ON THE PLANNING POLICIES**

**PLEASE COMMENT, EVEN IF YOU SUPPORT THE PLAN**

Page 9

# Playford Vision



## ***In a nutshell, the Plan:***

- Does not identify any new sites for housing
- Allows for infill development within tightly defined "clusters" drawn around the main built-up areas of the village
- Defines the main river valley as an "area of greater landscape value and sensitivity"
- Supports the retention of existing employment sites
- Designates an area of Local Landscape Sensitivity
- Identifies key views from public areas that should be considered when development is proposed
- Protects and maintains features of landscape and biodiversity value
- Identifies locally important buildings, the character of which should be respected when development is proposed
- Identifies key matters to reduce the impact of development on the village and our residents
- Seeks to minimise light pollution
- Seeks to protect our services and facilities
- Protects and encourages improvement of public rights of way

## **Neighbourhood Plan Vision**

In 2036, residents in Playford will enjoy a high quality of life with improved access to local facilities and services, and to the countryside within and around the parish. Built and natural heritage assets are conserved and enhanced by the sensitive siting and design of any new development

**The Vision translates into planning policies and community aspirations in the remainder of the Plan**



**DO YOU SUPPORT THE VISION?**

Sheet 4

# Development Location

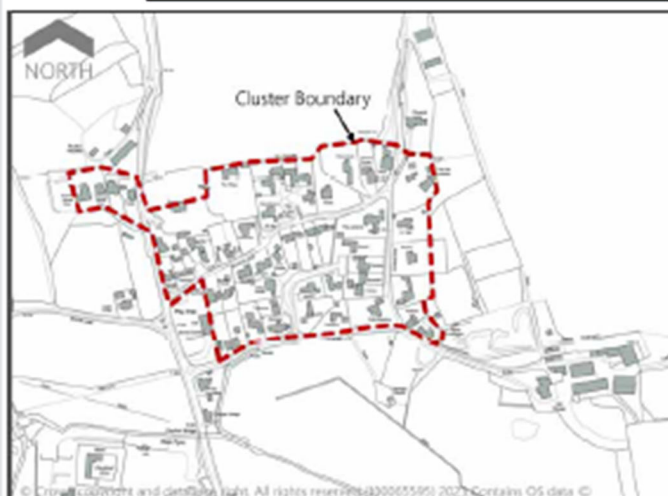


## Context

- The Local Plan policies for Playford allow limited infilling in existing "clusters" of five or more dwellings
- It also states that such sites "should consist of infilling within a continuous built up frontage, is in a clearly identifiable gap within an existing cluster, or is otherwise located adjacent to existing development on two sides"
- A separate Local Plan document ("Housing in Clusters and Small Scale Residential Development in the Countryside" Supplementary Planning Document) provides more guidance on how development in clusters will be considered
- The Neighbourhood Plan amplifies the Local Plan approach by identifying the extent of clusters in Playford that meet the definition, as illustrated on the maps

## Policy PFD1 - Playford's Clusters

In accordance with the adopted Suffolk Coastal Local Plan, clusters are defined on Maps 4 and 5. Within these areas, proposals for new dwellings will be supported where they are in accordance with Policy SCLPS.4 of the Local Plan and the "Housing in Clusters and Small Scale Residential Development in the Countryside" Supplementary Planning Document.



**DO YOU SUPPORT THE POLICY?**



# Landscape & Natural Environment



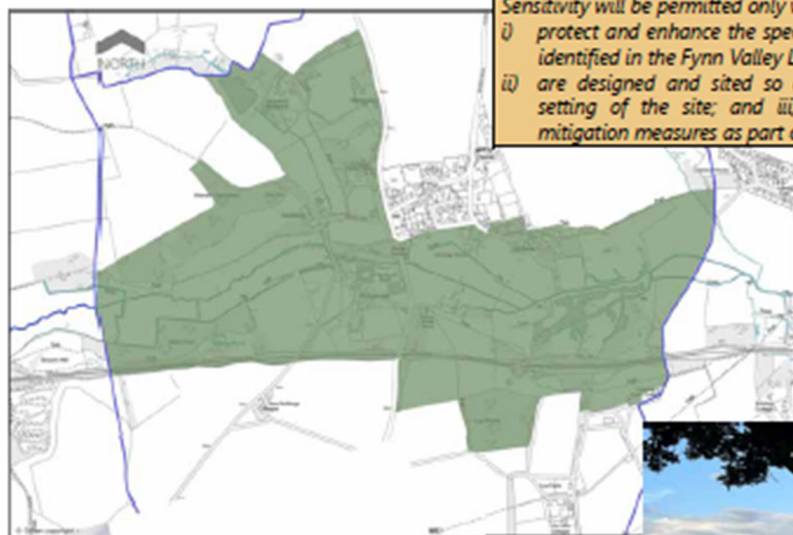
## Context

- The landscape of Playford is especially important and the location of the village is influenced by the presence of the River Fynn.
- Prior to the current Local Plan for the area, the Fynn Valley formed part of a wider "Special Landscape Area" designation, but this was not carried forward.
- A separate Landscape Assessment has identified that the Fynn Valley area has a high landscape value.
- The presence of the valley generates a number of important views in the parish from publicly accessible places, such as public footpaths looking primarily into the village.
- Trees, hedgerows, ponds and our wildlife are a major asset of the parish.

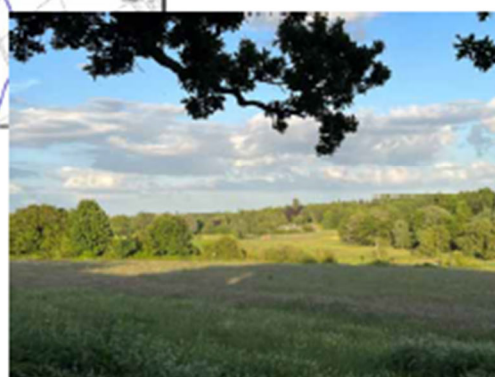
### Policy PFD2 - Area of Greater Landscape Value and Sensitivity

An Area of Greater Landscape Value and Sensitivity is identified on Map 7. Development proposals in the Area of Greater Landscape Value and Sensitivity will be permitted only where they:

- protect and enhance the special landscape qualities of the area, as identified in the Fynn Valley Landscape Value Appraisal (2022); and
- are designed and sited so as to harmonise with the landscape setting of the site; and
- provide suitable landscape impact mitigation measures as part of the proposal.



Fynn Valley Landscape Value Appraisal  
For Playford Parish Council  
March 2022



**DO YOU SUPPORT THIS POLICY?**

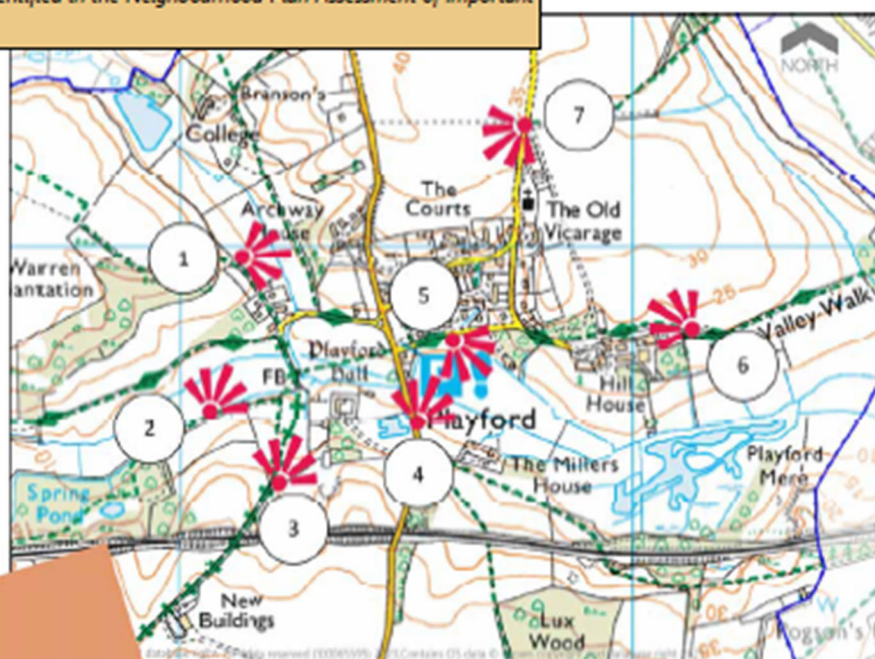


# Landscape & Natural Environment



## Policy PFD3 - Protection of Important Views

Important views from public vantage points, either within the built-up area or into or out of the surrounding countryside, are identified on Map 8. Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Important Views



**DO YOU SUPPORT THIS POLICY?**

# Landscape & Natural Environment



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

Development proposals should avoid the loss of, or substantial harm to, distinctive trees, hedgerows and other natural features such as ponds and watercourses.

Where such losses or harm are unavoidable:

- the benefits of the development proposal must be demonstrated to clearly outweigh any impacts; and
- suitable mitigation measures, that provide better replacement of the lost features will be required to achieve measurable biodiversity net gain.

Any such mitigation measures should form an integral part of the design concept. In addition, the layout and design of the development proposal concerned should be landscape-led and appropriate in relation to its setting and context and have regard to its ongoing management.

Otherwise acceptable development proposals will be supported where they provide a net gain in biodiversity through, for example:

- The creation of new natural habitats including ponds;
- The planting of additional native trees and hedgerows of local provenance (reflecting the character of Playford's traditional woodland and hedgerows), and;
- Restoring and repairing fragmented biodiversity networks through, for example, including swift-boxes, bat boxes and holes in fences which allow access for hedgehogs.

Where new access is created, or an existing access is widened, through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.



## **COMMUNITY ACTION 1 - WILDLIFE CORRIDORS**

The Parish Council will consider ways of working with neighbouring parishes to co-ordinate the improvement of wildlife corridors within and through the parish.

**DO YOU SUPPORT THIS POLICY?**



## Historic Environment

# Development Design



## Context

- You told us that the design of development is important.
- National planning policy is clear that 'good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'
- Preparing the Neighbourhood Plan provides us with the opportunity to identify the features and attributes that will make sure that new development reflects the character of the area and will not have unwanted impacts.
- As part of the Government support for preparing Neighbourhood Plans, we've commissioned the preparation of Design Codes for Playford.
- The Design Codes apply to the whole of the parish, although some codes will be more relevant to built up areas such as the village centre.
- The general area in the proximity of the River Fynn is susceptible to flooding, but national and Local Plan policies are sufficient to ensure that new development takes into account the flood zones of the Fynn.
- Artificial lighting, such as floodlighting, can have a significant impact on our rural setting.

## General design guidelines for new development:

- Integrate with existing paths, streets, circulation networks and patterns of activity;
- Reinforce or enhance the established settlement character of streets, greens, and other spaces;
- Harmonise and enhance existing settlement in terms of physical form, architecture and land use;
- Relate well to local topography and landscape features, including prominent ridge lines and long-distance views;
- Reflect, respect, and reinforce local architecture and historic distinctiveness;
- Retain and incorporate important existing features into the development;
- Respect surrounding buildings in terms of scale, height, form and massing;
- Adopt contextually appropriate materials and details;
- Provide adequate open space for the development in terms of both quantity and quality;
- Incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features;
- Ensure all components e.g. buildings, landscapes, access routes, parking and open space are well related to each other;
- Positively integrate energy efficient technologies;
- Make sufficient provision for sustainable waste management (including facilities for kerbside collection, waste separation, and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours;
- Ensure that places are designed with management, maintenance and the upkeep of utilities in mind; and
- Seek to implement passive environmental design principles by, firstly, considering how the site layout can optimise beneficial solar gain and reduce energy demands (e.g. insulation), before specification of energy efficient building services and finally incorporate renewable energy solutions.





# Development Design



## Policy PFD6 - Design Considerations

Proposals for new development must reflect the local characteristics and circumstances in the Neighbourhood Plan Area as identified in the Playford Design Guidelines and Codes, and create and contribute to a high quality, safe and sustainable environment.

In addition to having regard to the National Model Design Code, all planning applications should demonstrate how they satisfy the requirements of the Development Design Principles in Appendix 2 of the Neighbourhood Plan, as appropriate to the proposal.

In addition, and as appropriate to their scale, nature and location, proposals will be supported where:

- the key features, characteristics, landscape/building character, local distinctiveness and special qualities of the area are maintained and enhanced;
- they do not involve the loss of gardens, important open, green or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;
- designs respect the character, scale and density of the locality;
- 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;
- development faces on to existing roads wherever possible;
- water run-off would not add to or create surface water flooding;
- adequate provision for the covered storage of all wheelie bins and cycle storage is made, as appropriate and in accordance with adopted cycle parking standards;
- suitable ducting capable of accepting fibre to enable superfast broadband is included; and
- one electric vehicle charging point per new off-street residential parking place created is provided.



## Policy PFD7 - Artificial Lighting

While ensuring that new developments are secure in terms of occupier and vehicle safety, dark skies are to be preferred over streetlights. Any future outdoor lighting systems should have a minimum impact on the environment by being downward focussed and motion sensitive, not extend past the property boundary, and minimise light pollution and adverse effects on wildlife and subject to:

- highway safety;
- the needs of particular individuals and groups, or
- security

Schemes should reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare.

**DO YOU SUPPORT THESE POLICIES?**

# Services and Facilities



## Context

- The village currently has very little in the way of services and facilities.
- It is vital that existing services and facilities are protected and enhanced for the use of current and future residents.
- It is recognised that demands change over time, however, and it would be unreasonable to require the retention of facilities if there is no longer a proven need or demand for them.
- The Neighbourhood Plan protects facilities in the parish (including Kesgrave's allotments in Playford Lane) from being lost except in exceptional circumstances.

### Policy PFD8 - Parish Services and Facilities

Proposals that would result in the loss of the following facilities, as identified on Map 10 and Map 11, will be determined in accordance with Policy SCLP8.1 of the Local Plan:

- i. The Village Hall
- ii. The Play Park
- iii. Kesgrave Allotments, Playford Lane, Rushmere St Andrew

Proposals for the enhancement of the existing services and facilities will generally be supported subject to there being no unacceptable impact on the natural and historic environment, infrastructure and the amenity of residents



**DO YOU SUPPORT THIS POLICY?**

# Highways and Travel



## Context

- Despite the number of concerns raised when we carried out our Residents' Survey, neighbourhood plans have little power to introduce highway improvements as most schemes will not require planning permission.
- Improvements are therefore reliant on the County Council's Highways Department for investment in projects.
- Playford is fortunate to have a good network of footpaths and other public rights of way, providing access to our high quality countryside.
- The Plan contains a number of community actions to try and resolve the traffic issues you highlighted.

### Policy PFD9 - Public Rights of Way

Proposals that would result in the loss of the following facilities, as identified on Map 10 and Map 11, will be determined in accordance with Policy SCLP8.1 of the Local Plan:

- i. The Village Hall
- ii. The Play Park
- iii. Kesgrave Allotments, Playford Lane, Rushmere St Andrew

Proposals for the enhancement of the existing services and facilities will generally be supported subject to there being no unacceptable impact on the natural and historic environment, infrastructure and the amenity of residents



### COMMUNITY ACTION 2 - PUBLIC RIGHTS OF WAY

The Parish Council will continue to lobby landowners to ensure that the public rights of way network remains accessible and barrier free for all users throughout the year.

### COMMUNITY ACTION 3 - TRAFFIC CALMING

The Parish Council will consider ways of working with the County Council to install traffic calming points at the entrance to the village.

### COMMUNITY ACTION 4 - 20 MPH SPEED LIMIT

The Parish Council will consider ways of working with the County Council to designate a 20mph speed limit on roads in the village centre.

### COMMUNITY ACTION 5 - HGV's

The Parish Council will consider ways of working with the County Council to seek the introduction of lorry weight limits in the village centre.

### COMMUNITY ACTION 6 - PUBLIC TRANSPORT

The Parish Council will consider ways of working with bus operators, including community transport initiatives, to provide better public transport to nearby centres.



**DO YOU SUPPORT THE POLICY AND COMMUNITY ACTIONS?**



# What next?



## Consultation on the Neighbourhood Plan ends on 5 May

At the end of the consultation the Working Group will review all submitted comments before deciding if any amendments to the Plan are required.

At the same time a "Consultation Statement" and a document known as the "Basic Conditions Statement" will be prepared. The Final Draft Plan – known as the "Submission Plan" and the above documents will be put to the Parish Council for approval for submission to East Suffolk Council.

## Further Consultation

East Suffolk Council will carry out a further six-week consultation on the Neighbourhood Plan before it is submitted to an Independent Examiner.

## Examination

The Independent Examiner will review the Plan and consider any objections to it.

The Examiner's Report will recommend whether the Plan, possibly with amendments, should proceed to a referendum in the parish.



## Referendum

If the Examiner recommends that a Referendum on the Plan should take place, this will be organised and paid for by East Suffolk Council in the same way as a local election. Notice will be given of the Referendum and all those living in the parish that are entitled to vote will be asked whether the Neighbourhood Plan should be approved. No matter how many turn out to vote, if more votes say "Yes" then the Neighbourhood Plan will be adopted.

You can submit your comments on the Draft Neighbourhood Plan online at the Parish Council website or, if you don't have the internet, by completing a comments form and sending it to the address on the form.

Why not complete a form today?

## Appendix 3 – Statutory Consultees Consulted at Pre-Submission Stage

East Suffolk Council	Network Rail
SCC Neighbourhood Planning	National Highways
Kesgrave Town Council	Suffolk Wildlife Trust
Rushmere St Andrew PC	Suffolk Preservation Society
Tuddenham St Martin PC	Anglian Water
Culpho PC	Essex and Suffolk Water
Great Bealings PC	UK Power Networks
Little Bealings PC	Mobile UK
Suffolk and North-East Essex Integrated Care Board	Homes England
Environment Agency	Suffolk Police Designing Out Crime Officer
Historic England	Marine Management Organisation
Natural England	

## Appendix 4 – Statutory Consultees Notification

### **PLAYFORD NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION (REGULATION 14)**

Dear Sir / Madam

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended), Playford Parish Council is undertaking a Pre-Submission Consultation on the Draft Neighbourhood Plan for the Parish. East Suffolk Council has provided your details as a body/individual we are required to consult and your views on the Draft Neighbourhood Plan would be welcomed.

The full plan and supporting documents can be viewed here together with information on how to send us your comments.

This Pre-Submission Consultation runs until Friday 5 May 2023.



We look forward to receiving your comments. If possible, please submit them online at <https://www.smartsurvey.co.uk/s/PlayfordNP/> or, if that is not possible, please send them in a reply to this email.



Marian Hedgley




Clerk




Playford Parish Council

## Appendix 5 - Summary of Pre-Submission consultation comments



1. Do you support the content of Chapters 1, 2, and 3?				
Answer Choices			Response Percent	Response Total
1	Yes		75.00%	6
2	No		0.00%	0
3	No opinion		25.00%	2

2. Do you support the Vision in Chapter 4?				
Answer Choices			Response Percent	Response Total
1	Yes		75.00%	6
2	No		0.00%	0
3	No opinion		25.00%	2



3. Do you support Policy PFD1 - Playford's Clusters?				
Answer Choices			Response Percent	Response Total
1	Yes		50.00%	4
2	No		25.00%	2
3	No opinion		25.00%	2

4. Do you have any other comments on Chapter 5 – Development Location?				
Answer Choices			Response Percent	Response Total
1	Yes		37.50%	3
2	No		37.50%	3
3	No opinion		25.00%	2



### 5. Do you support Policy PFD2 - Area of Greater Landscape Value and Sensitivity?

Answer Choices			Response Percent	Response Total
1	Yes		75.00%	6
2	No		0.00%	0
3	No opinion		25.00%	2




### 6. Do you support Policy PFD3 - Protection of Important Views?



Answer Choices			Response Percent	Response Total
1	Yes		75.00%	6
2	No		0.00%	0
3	No opinion		25.00%	2




### 7. Do you support Policy PFD4 - Protection of Trees, Hedgerows and other Natural Features?



Answer Choices			Response Percent	Response Total
1	Yes		75.00%	6
2	No		0.00%	0
3	No opinion		25.00%	2




### 8. Do you support Community Action 1 – Wildlife Corridors?




Answer Choices			Response Percent	Response Total
1	Yes		75.00%	6
2	No		12.50%	1
3	No opinion		12.50%	1



9. Do you have any other comments on Chapter 6 - Landscape and Natural Environment?				
Answer Choices			Response Percent	Response Total
1	Yes		42.86%	3
2	No		57.14%	4



10. Do you support Policy PFD5 - Non-Designated Heritage Assets?				
Answer Choices			Response Percent	Response Total
1	Yes		62.50%	5
2	No		12.50%	1
3	No opinion		25.00%	2



11. Do you have any other comments on Chapter 7 – Historic Environment?				
Answer Choices			Response Percent	Response Total
1	Yes		14.29%	1
2	No		85.71%	6

12. Do you support Policy PFD6 - Design Considerations?				
Answer Choices			Response Percent	Response Total
1	Yes		62.50%	5
2	No		12.50%	1
3	No opinion		25.00%	2
			answered	8
			skipped	1




13. Do you support Policy PFD7 - Artificial Lighting?				
Answer Choices			Response Percent	Response Total
1	Yes		62.50%	5
2	No		12.50%	1
3	No opinion		25.00%	2




14. Do you have any other comments on Chapter 8 – Development Design?				
Answer Choices			Response Percent	Response Total
1	Yes		28.57%	2
2	No		71.43%	5



15. Do you support Policy PFD8 - Parish Services and Facilities?				
Answer Choices			Response Percent	Response Total
1	Yes		75.00%	6
2	No		0.00%	0
3	No opinion		25.00%	2




16. Do you have any other comments on Chapter 9 – Services and Facilities?				
Answer Choices			Response Percent	Response Total
1	Yes		42.86%	3
2	No		57.14%	4








17. Do you support Policy PFD9 - Public Rights of Way?				
Answer Choices			Response Percent	Response Total
1	Yes		62.50%	5
2	No		12.50%	1
3	No opinion		25.00%	2




18. Do you support Community Action 2 – Public Rights of Way?				
Answer Choices			Response Percent	Response Total
1	Yes		62.50%	5
2	No		12.50%	1
3	No opinion		25.00%	2



19. Do you support Community Action 3 – Traffic Calming?				
Answer Choices			Response Percent	Response Total
1	Yes		71.43%	5
2	No		0.00%	0
3	No opinion		28.57%	2



20. Do you support Community Action 4 – 20mph speed limit?				
Answer Choices			Response Percent	Response Total
1	Yes		62.50%	5
2	No		12.50%	1
3	No opinion		25.00%	2

21. Do you support Community Action 5 – HGVs?				
Answer Choices			Response Percent	Response Total
1	Yes		50.00%	4
2	No		25.00%	2
3	No opinion		25.00%	2

22. Do you support Community Action 6 – Public Transport?				
Answer Choices			Response Percent	Response Total
1	Yes		75.00%	6
2	No		0.00%	0
3	No opinion		25.00%	2
			skipped	1

23. Do you have any other comments on Chapter 10 – Highways and Travel?				
Answer Choices			Response Percent	Response Total
1	Yes		37.50%	3
2	No		37.50%	3
3	No opinion		25.00%	2

24. Do you support the content of the Appendices?				
Answer Choices			Response Percent	Response Total
1	Yes		62.50%	5
2	No		0.00%	0
3	No opinion		37.50%	3

25. Do you have any other comments on the Draft Neighbourhood Plan?				
Answer Choices			Response Percent	Response Total
1	Yes		25.00%	2
2	No		75.00%	6

## Appendix 6 - Responses received to Pre-Submission Consultation, Responses to Comments and Proposed Changes

The tables in this appendix set out the comments that were received during the Pre-Submission Consultation Stage and the responses and changes made to the Plan as a result of the comments. The table is laid out in Plan order with the general comments following the comments on the policies. Where proposed changes to the Plan are identified, they relate to the Pre-Submission Draft Plan. Due to deletions and additions to the Plan, they may not correlate to the paragraph or policy numbers in the Submission version of the Plan.

Name	Organisation	Comment	Parish Council Response	Changes to Plan
Chapters 1, 2, and 3 comments				
	East Suffolk Council	Neighbourhood Planning in a Nutshell Page 2, paragraph 2 The text currently says 'community-led planning plan', this text could just say community-led plan.	This will be corrected	Delete 'planning' in para 2 of page 2
		Chapter 1 – The Playford Neighbourhood Plan Page 6, paragraph 1.2 The word 'contrived' is still used and it does not seem correct in this context.	This will be amended	Delete 'contrived' and replace with 'contributed'
		Page 6 Diagrams are well presented and are identified in the text but are still not labelled or numbered. This can make them difficult to identify.	This is not considered necessary	None
		Chapter 2 – Playford Past and Present Page 7, paragraph 2.1 End of the paragraph should read 'off the beaten track' ('the' is missing).	This will be amended	Amend para 2.3 as suggested
		Page 8, paragraph 2.3 Typo - Paragraph numbered incorrectly.	The paragraph number will be corrected	Amend para number to 2.3
		Chapter 3 – Planning Policy Context Page 9, paragraph 3.2 The text still shows NPPF paragraph 11 as per the 2021 version.	The 2021 NPPF remains in force	None

Vision comments				
B Wale	-	Yes and we would appreciate a small shop in the village.	Noted	None
Policy PFD1 - Playford's Clusters				
H Legard	-	<p>Well No is too strong a comment. The reservations are that to date the planning and infilling that's taken place has been IMHO inappropriate.</p> <p>Firstly plot sizes need to be adequate for the house size, and nearness of neighbours given consideration.</p> <p>Secondly, if a house has an historic relevance to Playford, greater protection offered so it bears some resemblance to it's original character....or is this not important?</p> <p>Infilling in some cases makes sense, but who is going to monitor this, given the track record of builder/planners cooperating with each other?</p> <p>The parish councils need a strong presence on The Council for this to go ahead with confidence, otherwise villagers appear to be without protection against inappropriate infilling.</p> <p>I can understand the concept, but feel very unconfident about this not opening floodgates that there is no way of keeping under control.</p>	The Neighbourhood Plan provides design guidelines that will require impact on neighbouring properties and the character of the area to be taken into account.	None
L & K Bennett		<p>Feel this is short-sighted. - there are other areas that can be used if necessary but not urbanisation of the village.</p>	The Neighbourhood Plan provides design guidelines that will require impact on neighbouring properties and the character of the area to be taken into account.	None
	East Suffolk Council	While the Council acknowledges the intention of Policy PFD1 it still has reservations on this policy as SCLP5.4 does not include a policy window for Neighbourhood Plans to identify 'Clusters' in their areas. While this is also not explicitly prohibited by the policy, it was not the intention of the policy.	Noted	None
				None

		<p>The wording of the policy makes it appear that there are no other potential 'Clusters' in the Neighbourhood Area. Again, SCLP5.4 was not designed for this to be done and the decision for whether an area could be classed as a 'Cluster' ultimately lies with East Suffolk officers. The Council has previously recommended that paragraph 5.7 be reworded to explain that the 'Housing in Clusters and Residential Development in the Countryside' SPD provides guidance on how 'Clusters' are defined and how a judgement needs to be taken on a case-by-case basis. The current wording of the first half of the paragraph feels overly negative towards the SPD.</p>	<p>Paragraph 2.6 of the SPD is clear how clusters are defined and, in Playford's case, there are only two areas of the parish that meet that definition. These are identified on Maps 5 and 6.</p>	
		<p>The Council has also previously stated that, if this policy is to remain, the maps 5 (Village Centre Cluster) and 6 (Brook Lane Cluster) should be reviewed so they have thinner red lines in order for them to be more easily read by officers. Also, the red line should be more consistent in that some back gardens are included when others are not, with no clear explanation why.</p>	<p>The maps will be amended as suggested.</p>	<p>Amend Maps 5 &amp; 6 as suggested</p>
		<p>The policy seems supportive of new dwellings within these clusters, but the supporting text says that "it is considered very unlikely that further opportunities for infill development exist in this area given the Local Plan criteria" in terms of the Brook Lane Cluster, which means that there appears to be an inconsistency.</p>	<p>The policy reflects the parameters of the Local Plan policy but the supporting text acknowledges that, as would be expected in a countryside location, few opportunities for development exist.</p>	<p>None</p>
		<p>The policy text refers to maps 4 and 5, but this should be maps 5 and 6.</p>	<p>The policy will be amended to correct the map numbers</p>	<p>Amend the policy to refer to Maps 5 &amp; 6</p>
<b>Chapter 5 – Development Location comments</b>				
H Legard	-	See above	Noted	None
B Wale	-	I agree that there are few areas for infill development in the main cluster or Brook Lane, although affordable housing is required in the village.	Noted	None



East Suffolk Council	Chapter 5 – Development Location Page 12, paragraph 5.7 Speech marks still missing from end of second ‘well-related’.	Noted	Amend Para 5.7 as suggested
<b>Policy PFD2 - Area of Greater Landscape Value and Sensitivity</b>			
No comments received			
<b>Policy PFD3 - Protection of Important Views</b>			
East Suffolk Council	There is also no definition of what would constitute a detrimental visual impact.	The separate Assessment of Important Views identifies the key features of the views and it will be a matter for any application to be assessed against the Assessment.	None
<b>Policy PFD4 - Protection of Trees, Hedgerows and other Natural Features</b>			
H Legard	-	Its a YES, however there are trees, hedges and natural features growing within more central areas of the village. These also provide welcome protection for wildlife, so not be removed, mowed or trimmed indiscriminately ?	The trimming or removal of trees and hedgerows when not associated with a planning application would not require planning consent unless the tree is protected by a preservation order.
B Wale	-	We would welcome further development to expand these areas along green corridors and improve biodiversity. We have recorded and photographed a rare Lesser Spotted Woodpecker in the mature oaks at the back of our garden in Warren Plantation, Brook Lane in February 2022. This river valley is a special interconnected habitat for rare species and could be enhanced further.	Noted
Suffolk Wildlife Trust		The Suffolk Wildlife Trust are pleased to see that the Playford Neighbourhood plan recognises the importance of biodiversity and seeks to ensure its protection and enhancement within Policy PFD4 and would like to put forward our thoughts on how the policy could deliver more for wildlife in the parish.	Noted

<p>We recommend that this policy should reference safeguarding Sinks Valley Site of Special Scientific Interest (SSSI), and all five County Wildlife Sites (CWSs) within the Parish. Additionally, there are several Priority Habitats represented within Playford including hedgerows, coastal and floodplain grazing marsh, lowland fens, deciduous woodland, and wood pasture and parkland which should also be highlighted within the plan text or policies in order to provide protection and where possible enhancement of these key habitats which in turn support a wide range of species, including priority and notable species.</p>	<p>It is not considered necessary to amend the policy to reference to designations, but a reference will be made to priority habitats in the supporting text.</p>	<p>Amend Para 6.13 to refer to Playford's priority habitats.</p>
<p>The proposed policy PFD4 notes that acceptable development will be supported where a net gain in biodiversity is provided. We welcome suggestions of the creation of ponds, native hedgerow and tree planting (especially supporting hedgerows of local provenance) however note that this will soon become a necessity for a majority of projects once the Environment Bill is enforced and a requirement for biodiversity net gain comes into force.</p>	<p>Noted</p>	<p>None</p>
<p>Policy PFD4 also proposes species specific mitigation, compensation, and enhancement such as bird and bat boxes as well as providing access for hedgehog passage through new fences. We believe that this can be further improved by putting forward that each new dwelling should include a bird and bat box (suitably installed and where possible integrated into the building), any impermeable boundary fences installed include access for hedgehogs (with hedgerows a preferred boundary where appropriate), and that further enhancement options such as hedgehog houses, invertebrate boxes, and bee bricks should be widely considered.</p>	<p>Given that there is likely to be only a minimal amount of new housing in Playford, this amendment is not considered necessary and can be covered by district wide planning policies.</p>	<p>None</p>
<p>Swift boxes are specifically mentioned and are a welcome addition for this local priority species. However, other notable species recorded in the parish such as starling, house sparrow, and barn owl, could also benefit from the provision of well situated and good quality nest boxes. The proposed encouragement of new hedgerow planting and the enhancement of existing hedgerows is welcomed and has great</p>	<p>Noted</p>	<p>None</p>

	<p>potential to provide foraging habitat for birds, as well as nesting habitat for specialist species such as yellowhammer which have been recorded in the parish</p> <p>The proposal to ensure that where hedgerow is lost to create access, splay returns should be planted using native hedgerow is supported but this policy could be improved to 'species-rich native hedgerow' replaced at a ratio of at least 2m planted for every 1m removed. This will seek to provide additional hedgerow within the landscape to further support connectivity within the Parish which supports Community Action 1 – Wildlife Corridors. Further information on species recorded locally, County Wildlife Sites, Priority Habitats and Species can be obtained from the Suffolk Biological Information Service<sup>1</sup> and MAGIC Map<sup>2</sup>.</p>	<p>This is considered too detailed for inclusion in the planning policy. Given that it refers to a visibility splay for a new access, it is considered almost impossible to achieve 2m of new hedgerow for every 1m lost.</p>	<p>None</p>
East Suffolk Council	<p>i) It is suggested that the supporting text makes reference to the national Biodiversity Net Gain policy, which is due to be introduced from December 2023.</p> <p>Within PFD4 the policy states "Development proposals should avoid the loss or substantial harm to, distinctive trees, hedgerows and other natural features such as ponds and watercourses. Where such losses or harm are unavoidable", whilst the Ecology Team agrees with the protection of the proposed features listed, it is requested that there is clarification on what would be described as a "distinctive tree" is included in the Plan. Without this it is not considered that the proposed policy would be able to achieve its intended aim.</p>	<p>Paragraph 6.16 already refers to the Act but we believe that the requirement for large developments will be introduced in November 2023 but for smaller developments such as is likely in Playford, this is not required until April 2024.</p> <p>The policy will be clarified by deleting "distinctive".</p>	<p>None</p> <p>Delete "distinctive" from first sentence of policy</p>

		Also, regarding Policy PFD4, it is suggested that the text within criterion c <i>"Restoring and repairing fragmented biodiversity networks"</i> is added to criterion b and that the examples of ecological enhancements are retained in criterion c within a sentence such as <i>"Ecological enhancement of habitats for species of conservation importance such as swift-boxes, bat boxes and holes in fences which allow access for hedgehogs."</i> So, criteria b and c read as: <i>b. Restoring and repairing fragmented biodiversity networks through the planting of additional native trees and hedgerows of local provenance (reflecting the character of Playford's traditional woodland and hedgerows), and;</i> <i>c. Including ecological enhancement of habitats for species of conservation importance such as swift-boxes, bat boxes and holes in fences which allow access for hedgehogs.</i>	The policy will be amended as suggested.	Amend Policy PFD4 as suggested by East Suffolk Council.
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#### Community Action 1 – Wildlife Corridors

H Legard	-	<p>Well, yes but my comment is as said above its not purely the outskirts village which needs consideration.</p> <p>For example, the bio diversity around the village hall, along Hall Farm Road (which is now not fortunately trimmed to the soil!), and up Church Lane.</p> <p>Also, the bank of woodland, trees laurel,. blackberries that runs along the side of some of Spring Meadow. This area is a little appreciated hive of wildlife-grass snakes, stag beetles, hedgehogs (if the badgers dont get them). Because its untouched and life can form there as it nature intents.</p> <p>Deer wander in too during the nights, and its a safe haven for song birds. Especially as their longstanding safe habits are removed due to garden redevelopments, or housebuilding.</p> <p>In addition, the bank produces some of the finest Blackberries, picked by local families and those from neighboring villages. Also, a buffer against excessive water, where there's vegetation and roots, these all help to slow the power of the rainfall that's come with climate change.</p> <p>Why is the village grass cut so short, along verges decimating any</p>	Noted	None
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		wildflowers, weeds and insects every time.? Trim the edges ok, but listen to what the environmentalist say, let the verges grow! Again, the more vegetation on verges, the less easily heavy rain can run off.		
B Wale	-	Please consider expanding these green corridors with hedgerows and tree planting, bringing the community together to undertake these tasks, working alongside neighbouring parishes.	Noted	None
	Suffolk Wildlife Trust	Suffolk Wildlife Trust are happy to see that Playford Parish Council will consider new ways of working with its neighbouring parishes to improve wildlife corridors within and through the Parish to neighbouring areas.	Noted	None
		The NPPF (2021) (Section 179) identifies that plans should 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them' and 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' Considering the emphasis within the NPPF to map and safeguard wider ecological networks, we recommend this Community Action include identifying and mapping wildlife corridors within the parish.	This is not considered necessary for the Neighbourhood Plan	None
		Existing ecological networks within the Parish primarily lie along the River Fynn and the railway line; these provide habitat both through and beyond the Parish, with three of the five County Wildlife Sites in the Parish within 100m of the river or railway line. These could be further improved and extended to the south to provide greater connectivity to Sinks Valley SSSI and Playford Reservoir County Wildlife Site in the northwest.	Noted	None
		Some parishes, such as Oulton in northeast Suffolk, have included green corridor maps within their Neighbourhood Plans and highlight the need to protect and enhance these areas for wildlife. A green corridor map would satisfy the requirement within the NPPF to map	This is not considered necessary.	None



and safeguard ecological networks and could be referenced within Policy PFD4 to highlight areas where Biodiversity Net Gain and enhancement from development could be targeted as well as highlighting the locations of County Wildlife Sites and Sinks Valley SSSI.

## Chapter 6 - Landscape and Natural Environment comments

H Legard	-	<p>I repeat what I said above:</p> <p>Plus, the village ditches and gullies need regular attention now there is so much run off water. Its not cosmetic, its good housekeeping, protects the roads from wear, sends the water where it needs to go. There are good ditches, but they will always need silt clearing. This will help Brook Lane, access to the Village hall and along Hall Farm Road.</p> <p>Its not purely the outskirts of the village which needs consideration. For example, the bio diversity around the village hall, along Hall Farm Road (which is now not fortunately trimmed to the soil!), and up Church Lane.</p> <p>Also, the bank of woodland, trees laurel,. blackberries that runs along the side of some of Spring Meadow. This area is a little appreciated hive of wildlife-grass snakes, stag beetles, hedgehogs (if the badgers dont get them). Because its untouched and life can form there as it nature intends.</p> <p>Deer wander in too during the nights, and its a safe haven for song birds. Especially as their longstanding safe habits are removed due to garden redevelopments, or housebuilding.</p> <p>In addition, the bank produces some of the finest Blackberries, picked by local families and those from neighbouring villages. Also, its a buffer against excessive water run off, as there's plenty of vegetation and roots, these all help to slow the power of the rainfall that's come with climate change.</p>	Noted	None
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		Why is the village grass cut so short, along verges decimating any wildflowers, weeds and insects every time.? Trim the edges ok, but listen to what the environmentalist say, let the verges grow! Again, the more vegetation on verges, the less easily heavy rain can run off.		
B Wale	-	We have asked friends in the Suffolk Bird Group to undertake a bird survey and record bird and mammal species in the Playford Mere reserve to add to our understanding of it's value interconnecting habitats across the area.	Noted	None
	Suffolk Wildlife Trust	<p>Biodiversity Net Gain</p> <p>The new Environment Act 2021 requires development proposals to achieve a 10% net gain in biodiversity; whilst not yet required in law, this level is already being implemented as good practice across the country. It is expected that a legal requirement for a measured 10% net gain on larger developments will be enforceable from November 2023, with smaller developments seeing mandatory net gain of at least 10% in Spring 2024.</p> <p>The Wildlife Trusts, as well as other organisations, are advocating for 20% Biodiversity Net Gain (BNG) where possible. Setting an aspiration for achieving a higher percentage of net gain within the Neighbourhood Plan could help to ensure that the biodiversity assets of Playford are conserved and enhanced for future generations. Suffolk County Council's recent commitment to 'deliver a further 10% biodiversity net gain in aggregate across the housing programme, in addition to the 10% biodiversity net gain that will be required on each site.'<sup>4</sup>, suggests that it is reasonable to include this aspiration within the Playford Neighbourhood Plan.</p> <p>In the wider county, West Suffolk also consider a greater than 10% requirement for BNG in their recent preferred options consultation on their Local Plan. There are further examples of district councils outside of Suffolk requiring more ambitious BNG requirements within their Local Plans and these have been evidenced with viability studies. For example, Swale Borough Council completed a viability study and found that doubling the percentage of biodiversity net gain from 10%</p>	<p>Noted</p> <p>Given that the Act will require a minimum 10% net gain, it is not considered necessary to include this requirement in the Plan. Furthermore, any requirements over and above that specified in the Act has to be supported by locally relevant evidence.</p> <p>The West Suffolk Local Plan has yet to be published and face examination and so the preferred options have no weight. Likewise in the case of Swale and Greater</p>	<p>None</p> <p>None</p> <p>None</p>

	<p>to 20% increased the cost of delivery by just 19%, so then included a minimum 20% BNG requirement in their local plan<sup>5</sup>. The Greater Cambridge Draft Local Plan also includes a requirement for a minimum 20% BNG<sup>6</sup>. Therefore, we believe that Policy PFD4 could include a statement in support of development where 20% BNG can be demonstrated in the Parish. Delivering 20% BNG ensures there is more certainty that a significant and meaningful uplift in biodiversity will be achieved, which will help protect the high-quality biodiversity assets and ecological networks within Playford and surrounding parishes.</p>	Cambridge, which cannot be applied to Playford.	
East Suffolk Council	<p>Page 15, paragraph 6.2 The text still refers to the Suffolk Structure Plan and Special Landscape areas. The former is no longer current. However, the text has been updated to state that the latter were not carried forward into the new Local Plan. This is due to the evidence base supporting the special landscape area designation becoming obsolete.</p> <p>Page 15, paragraph 6.4 It is noted from Section 6.4 of the draft Neighbourhood Plan that the Parish Council commissioned a study of Playford Mere in 2019 to inform the preparation of the Neighbourhood Plan, "The study identified that the Mere incorporates a number of UK Priority Habitats and recommended that the extent of the County Wildlife Site be extended to include the adjacent sandy cliff". For information this extension of the County Wildlife Site (CWS) was completed in 2019 and therefore it is recommended that the above text be updated to reflect this.</p> <p>Page 16, paragraph 6.5 In section 6.5 it appears that the word 'enhance' is missing and that the text should read as "Policy SCLP10.1: Biodiversity and Geodiversity seeks to protect and enhance habitats and designated sites of national and enhance local biodiversity and geodiversity importance."</p>	<p>The text provides the context for when Special Landscape Areas were originally designated in a development plan.</p> <p>The Plan will be amended to reflect that the County Wildlife Site was extended.</p> <p>The word 'enhance' is not missing but 'importance' is</p>	<p>None</p> <p>Amend Para 6.4 to note that the County Wildlife Site has been extended</p> <p>Amend Para 6.5 to insert "importance" after national.</p>

<p>Page 16, paragraph 6.6 The text still refers to East Suffolk Council, not Suffolk Coastal District Council as having commissioned the Suffolk Coastal Landscape Character Assessment and the Settlement Sensitivity Assessment.</p>	<p>Para 6.6 will be amended.</p>	<p>Amend Para 6.6 to refer to Suffolk Coastal District Council as having commissioned the study.</p>
<p>Page 16, paragraph 6.8 Sentence 1 should read 'Recognising the fact that...'</p>	<p>Para 6.8 will be amended.</p>	<p>Amend Para 6.8 as suggested by East Suffolk Council</p>
<p>Page 16, paragraph 6.9 Area of Greater Landscape Value and Sensitivity – We would be grateful if you could confirm whether this refers to policy PFD2. This requires greater explanation in the text.</p>	<p>Given that Policy PFD is titled Area of Greater Landscape Value and Sensitivity then it is considered obvious.</p>	<p>None</p>
<p>Bullet point 3 – last sentence should read '...within an ancient pattern of enclosures.'</p>	<p>The third bullet point will be amended</p>	<p>Amend third bullet point of para 6.9</p>
<p>Page 17, paragraph 6.10 Sentence 1 should read '... a landscape and visual assessment...' should all be lower case.</p>	<p>Para 6.10 will be amended</p>	<p>Amend Para 6.10 as suggested by East Suffolk Council</p>
<p>Page 18, paragraph 6.11 The parish council website neighbourhood plan section includes an Appraisal of Important views. It is assumed that this is the same as the Assessment of Important Views, but the wording should be made more consistent to minimise confusion.</p>	<p>The title of the supporting document will be amended</p>	<p>Replace "Appraisal of Important Views" with "Assessment of Important Views"</p>
<p>Page 18, paragraph 6.13 Sentence 1 should read '...a County Wildlife Site...'</p>	<p>Para 6.13 will be amended</p>	<p>Amend Para 6.13 to refer to County Wildlife Site singular</p>



Policy PFD5 - Non-Designated Heritage Assets				
H Legard	-	Well only if they can be protected, the form's not been great so far.	None	None
	East Suffolk Council	East Suffolk Council very much welcomes this Policy and the inclusion of the local list of Non-Designated Heritage Assets within it. The policy wording refers directly to the policy and tests within the Suffolk Coastal Local Plan and this will ensure that the neighbourhood plan and the Local Plan are mutually self-supporting. That is, the Local Plan provides the overarching policy and the means of NDHA identification, and the neighbourhood plan populates the list of identified assets to be protected by the said policy. This approach is supported.	Noted	None
		The Non-Designated Heritage Asset identification criteria focus on buildings and structures. However, has the neighbourhood plan has considered any other type of assets worthy of identification in this way? The National Planning Policy Framework says that a heritage asset can be a site, place, area or landscape having a degree of significance meriting consideration in planning decisions, because of its heritage interest (Annex 2: Glossary). Is the road bridge over the River Fynn of historic interest, for example? Does the historic farmstead at Hill Farm retain any buildings (aside from Hill House, identified here as an NDHA) or groups of buildings of heritage interest, for example?	Noted	None
			Insufficient evidence is available to support identification of the buildings and structures suggested by East Suffolk Council	None
Chapter 7 – Historic Environment comments				
	Suffolk County Council	SCC welcomes the reference to SCCAS and the HER in paragraph 7.3.	Noted	None
		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	This is not considered necessary	
	East Suffolk Council	Page 21, Paragraphs 7.6 and 7.7 The Council strongly welcomes the opportunity taken here to include a local list of Non-Designated Heritage Assets in the neighbourhood	Noted	Insert map in Appendix to identify location of

		plan. East Suffolk Council welcomes the use of its adopted and published criteria in making the identifications included here. It is pleasing that the criteria have gained a much wider currency, as here, and have been used to identify (and protect) multiple heritage assets of local interest across the district.		non-designated heritage assets.
		Page 22, Would be useful to include a masterplan showing the location of all the sites whether here or in the appendices.	A map will be included in the Appendix to identify location of non-designated heritage assets.	
<b>Policy PFD6 - Design Considerations</b>				
H Legard	-	Design appropriate for a village environment, not vanity projects.	Noted	None
	Anglian Water	Anglian Water supports the policy approach particularly in relation to ensuring that run-off would not add to or create surface water flooding in the neighbourhood plan area.	Noted	None
	Suffolk County Council	<p><b>Flooding</b></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> <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</u> water run-off <del>would not that would</del> 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:</p>	Noted	None
			The policy will be amended as suggested	Amend part f. of the policy as suggested by the County Council
			The County Council is aware that the Written Ministerial	None

		<p>"[...] proposals will be supported where:</p> <p><u>j. 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>	Statement 2015 precludes neighbourhood plan stipulating these requirements.	
East Suffolk Council		<p>g) Consideration could be given to the design and placement of the wheelie bin storage as a poorly located and designed wheelie bin storage can be problematic. There may be circumstances where non-covered wheelie bin storage may be an equally valid solution. Policy SCLP11.1 states: 'Ensure that the layout and design incorporates adequate provision for the storage and collection of waste and recycling bins in a way which does not detract from the appearance of the development; and'</p> <p>i) Suffolk Parking Standards Guidance (2019), page 68, states that new dwellings should include ducting and a suitable consumer unit to allow for the installation of one wall charging unit per dwelling if required. Part i) exceeds this requirement in that it states there should be one electric vehicle charging unit for each parking space. The justification for exceeding the Suffolk Parking Standards Guidance is not clear. It is recognised that the policy states it is appropriate to their scale, nature and location, but the policy may need amending to state that the development is expected to meet the electric charging point requirement of the Suffolk Parking Standards Guidance (2019) and that any additional charging point will be supported.</p>	<p>Noted. Part g will be amended to reflect these comments.</p> <p>The policy requirement reflects that in the made Rushmere St Andrew NP</p>	<p>Amend part g of policy to reflect the potential to screen and/or cover of wheelie bins</p> <p>None</p>
<b>Policy PFD7 - Artificial Lighting</b>				
H Legard	-	Street lighting yes, other security lighting has a significance.	Noted	None
G Williams	-	getting a lot of light pollution at the butts road/ hill farm road junction	Noted	None
East Suffolk Council		<p>Policy PFD7 - Artificial Lighting</p> <p>The term vehicle safety could be changed to include other road users like cyclists and pedestrians.</p> <p>The Ecology Team welcomes the recognition of the importance of lighting design strategies for protecting biodiversity.</p>	The first line of the policy will be amended to highway safety	Amend first line of the policy to replace vehicle with highway

## Chapter 8 – Development Design comments

Anglian Water	<p>We welcome reference to the Playford Design Guidelines and Codes which promote sustainable design (SD 3.5) with 3.5.1 Features in Dwellings identifying energy and water efficiency measures. We would welcome reference to sustainable design and water efficient measures in the policy and/or design checklist, particularly since the publication of the Government's Environment Improvement Plan that sets ten actions in the Roadmap to Water Efficiency in new developments. This includes a new standard for new homes in England of 100 l/p/d where there is a clear local need, such as in areas of serious water stress. A more ambitious water efficiency standard of 100 l/p/d could therefore be endorsed and achieved through a fixtures and fittings based approach.</p>	These are matters that are dealt with through the Building Regulations	None
	<p>We welcome the reference to sustainable drainage systems in para. 8.12 in relation to managing the impact of development on surface water flooding. Anglian Water would support wording that stated SuDS should be prioritised for managing surface water in the most sustainable way, providing multifunctional benefits for biodiversity and amenity. This paragraph could cross refer to the Playford Design Guidelines and Codes section on rainwater harvesting.</p>	Noted	Noted
	<p>Furthermore, we agree with the NP para. 8.13 that the adopted Local Plan provides an adequate policy framework to manage surface water run-off. It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024.</p>	Noted	Noted
Suffolk County Council	<p>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.</p>	Noted	
	<p>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</p>	The paragraph will be amended as suggested.	Amend para 8.12 as suggested by the County Council



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 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 Observatory<sup>3</sup> 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"<sup>4</sup>. The

This is not considered necessary given the size of Playford.

None

	<p>Royal Town Planning Institute has guidance on Town Planning and Dementia<sup>5</sup> and for Neurodiversity<sup>6</sup> (to support those with learning difficulties) which may be helpful in informing policies.</p> <p>Health and Wellbeing</p> <p>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 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:</p> <p><u><i>Development proposals should be accompanied by a Building for a Healthy Life Assessment<sup>7</sup> that determines how the development contributes to the quality of Playford as a place to live.</i></u></p>	<p>This is not considered necessary</p>	<p>None</p>
East Suffolk Council	<p>Page 24, paragraph 8.1 states 'Although planning policies do not support the construction of significant housing development in Playford'. It is not clear what 'significant' means in this context. Whilst there are no allocations for major development in Playford, policy could support a development that may be 'significant' relative to Playford if it meets all other criteria.</p>	<p>It is not considered that, based on the strategic policy for development in clusters, there are opportunities for significant development.</p>	<p>None</p>
	<p>Page 24, paragraph 8.5</p> <p>The quote from the National Design Guide still needs to be deleted or changed.</p>	<p>The quote is from the PPG. The paragraph will be amended to reflect this.</p>	<p>Amend Para 8.5 to refer to the Planning Practice Guidance</p>
	<p>Page 25, paragraph 8.8</p> <p>The bar chart still needs a title and to be tidied up. Text should be contained within each bar or as a separate label.</p>	<p>A title will be added but it is considered that the text is sufficiently clear.</p>	<p>Amend chart on page 25 to add a title</p>
	<p>Page 25, paragraph 8.10</p> <p>This document is referred to as Design Guidelines and Codes and Design Guidance and Codes. A consistent approach is needed.</p>	<p>The Plan will be amended to refer to the Design Guidance and Codes</p>	<p>Amend para 8.10 as identified</p>
	<p>Page 26 - General Design Guidelines for New Development</p> <p>Bullet point 3 - 'Harmonise and enhance existing settlement...' should read 'Harmonise and enhance with existing settlement...'</p>	<p>The bullet point will be amended</p>	

		<p>Page 27, paragraph 8.11 There is no reference about the where the flood risk information comes from. The map should also be revised to show areas at risk from surface water flooding, as well as flooding from the River Fynn. The last sentence uses the words 'will not be permitted.' 'Supported' might be a better word.</p> <p>Page 28, paragraph 8.14 Text still refers to NPPF 180c). This should be amended to 185c).</p>	<p>The map states that the source is the Environment Agency The last sentence will be amended.</p> <p>Para 8.14 will be amended.</p>	<p>None</p> <p>Amend last sentence of para 8.11 to replace permitted with supported.</p> <p>Amend para 8.14 to refer to para 185c) of the NPPF</p>
<b>Policy PFD8 – Parish Services and Facilities</b>				
B Wale	-	We hope to see a village shop in the near future, maybe the community can pull together to help this become a reality.	Noted	None
	East Suffolk Council	Paragraph 2 – text amended to use the word 'unacceptable' in judging the impact of community facility enhancements on the historic environment. However, it is not clear exactly what this means. Would 'significantly negative' be better?	The policy as worded is considered suitable	None
<b>Chapter 9 – Services and Facilities comments</b>				
B Wale	-	We hope to see a village shop in the near future, maybe the community can pull together to help this become a reality.	Noted	None
	East Suffolk Council	Page 29, paragraph 9.4 Delete extra full stop at end of paragraph.	The extra full stop will be deleted	Delete extra full stop at end of paragraph 9.4
<b>Policy PFD9 – Public Rights of Way</b>				
No comments received				
<b>Community Action 2 – Public Rights of Way</b>				

G Williams	-	Community Action 2, 4 & 5  Please bear in mind that LGVs are essential for local businesses/deliveries to the residents. Through traffic (and even some residents!!) don't obey the existing speed limit, this wouldn't change with introduction of lower limits. Some of the footpaths that make up the wider network are getting 'cut-up' by bicycles and horses using them - the existing 'no right to cycle' signs are far too small and are easily ignored.	It is acknowledged that a balanced approach has to be taken	None
	East Suffolk Council	The Ecology Team support the acknowledgement of the existing value of Public Rights of Way in relation to biodiversity corridors and the consideration of measures to enhance biodiversity within development proposals.	Noted	None
<b>Community Action 3 – Traffic Calming</b>				
G Williams	-	Try anything - doubt that it'll work.	Noted	None
<b>Community Action 4 – 20mph speed limit</b>				
G Williams	-	If the residents can't stay within the current speed limits, what makes you think that they'll go any slower?	Noted	None
<b>Community Action 5 – HGVs</b>				
B Wale	-	Lorries rarely seem to go through the village and if they do, are more careful and slower than cars.	Noted	None
G Williams	-	HGVs are the lifeblood of this country - without them hauling goods to and from businesses, delivering goods to houses, the country will die.	Noted	None
<b>Community Action 6 – Public Transport</b>				
H Legard	-	The village needs it!	Noted	None
<b>Chapter 10 – Highways and Travel comments</b>				
H Legard	-	Village will be best served if some kind of Hoppa bus service can ever be devised for here and nearby villages.	Noted	None
G Williams	-	Try and persuade the council to repair the potholes!	Noted	None

Appendices comments				
	East Suffolk Council	<p>Appendix 1 – Non-Designated Heritage Assets</p> <p>Paragraph 2 does not quite scan and appears to include repetition: ‘...identified during the preparation of the Playford Neighbourhood Plan meet the East Suffolk criteria for designation as meeting the criteria for designation as Non-Designated Heritage Assets’.</p> <p>Is the end of paragraph 2 waiting for an appendix number to be added: ‘The Assessment does not include Designated Heritage Assets, as noted on Historic England’s website and identified in Appendix herewith’.</p>	The second paragraph will be amended	Amend second paragraph of Appendix 1 to provide greater clarity
		<p>The approach taken here to setting out the non-designated heritage assets, why they have been identified, cross-referring them to the relevant East Suffolk Council identification criteria, and their mapping, is exemplary. The approach here is an excellent way in which to set out all the relevant detail and is commended. This is clear, concise and an exemplar for other neighbourhood plans to follow as a format. Having read the descriptions of the non-designated heritage assets and applicable criteria, they do all appear merit-worthy for inclusion. NDHAs do not require approval from the design team.</p>	Noted	
		<p>Page 43, Glossary</p> <p>Designated Heritage Asset – ‘Asset’ needs to be highlighted.</p>	The Glossary will be amended	Amend the Glossary as identified
Other comments				
H Legard	-	I hope peoples comments are heard.	Noted	None
C Waldron	Ministry of Defence DIO Safeguarding Department	<p>Your reference: Playford's Neighbourhood Plan Draft pre-submission</p> <p>Our reference: 10058736</p> <p>E-mail:</p> <p>DIO-Safeguarding-Statutory (MULTIUSER) DIO-SafeguardingStatutory@mod.gov.uk Marian Hedgley</p>	Noted	None

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Parish Council Clerk  
Playford Parish Council  
The Coach House  
Playford Mount  
Gt Bealings  
Woodbridge  
IP13 6PH

5th May 2023

Dear Marian,

It is understood that Playford Parish Council are undertaking a consultation regarding their Pre-Submission Neighbourhood Plan Draft Plan. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

The MOD may be involved in the planning system both as a statutory and non-statutory consultee with statutory involvement stemming from consultation occurring as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up Housing and Communities (DLUHC) in accordance with the provisions of that Direction. Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.



The MOD have an interest within the area covered by the pre-submission Playford Neighbourhood Plan Draft in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Playford Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photovoltaic panels and their associated infrastructure) are of particular concern.

Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Anglian Water

Thank you for inviting comments from Anglian Water on the Playford draft pre-submission Neighbourhood Plan. We welcome the opportunity to comment as the statutory water and sewerage undertaker for the neighbourhood plan area, as follows: [see above]

Noted

None

I would like to take this opportunity to wish the Parish Council every success in taking the neighbourhood plan forward to the submission

	stage. Should you have any queries, please do not hesitate to contact me.		
National Highways	<p>Thank you for your correspondence, dated 21 March 2023, notifying National Highways of the above Neighbourhood Plan.</p> <p>National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Neighbourhood Plan, National Highways have responsibility for the trunk road A14.</p> <p>We have reviewed the 'Pre-Submission Draft Plan - March 2023' and note the area and location that is covered are remote from the nearest Strategic Road Network, A14. Consequently, the draft policies set out are unlikely to have an impact on the operation of the trunk road and we offer No Comment.</p>	Noted	None
Natural England	<p>Thank you for your consultation on the above dated 21 March 2023. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on the Playford Neighbourhood Plan.</p> <p>However, we refer you to the attached annex [available from the Parish Council on request] which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>	Noted	None
Suffolk County Council	Thank you for consulting Suffolk County Council (SCC) on the Pre-Submission version of the Playford Neighbourhood Plan.	Noted	None

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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:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Health and Wellbeing
- Libraries
- Minerals and Waste
- Natural Environment
- Public Rights of Way
- 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**

Noted

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.

#### **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.

East Suffolk Council

East Suffolk Council welcomes the opportunity to comment on the pre submission (Regulation 14) Playford Neighbourhood Plan and notes that there is a lot of valuable content within the draft Neighbourhood Plan. East Suffolk Council wishes to make the following comments about the Playford Neighbourhood Plan and we trust that you will find the comments below helpful in progressing the Plan. The Council has a role in providing support for neighbourhood plan groups throughout the plan making process. This includes providing comments in response to consultations and we would very much welcome further discussion on our comments and other aspects of the preparation of the Plan as the Plan progresses.

Noted

None

Largely, the overall approach and strategy of the draft Neighbourhood Plan is considered to be appropriate in the context of the Suffolk Coastal Local Plan and the Plan is considered to be well presented and structured. However, a number of comments are set out below, including on some policy elements. Many of these are matters of clarity and detail, however there is a matter of principle raised in relation to policy PFD1 – Playford's Clusters.

Noted

**HRA and SEA Screening**

Noted

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As requested, the Council is currently progressing the screening for Strategic Environmental Assessment and Habitats Regulations Assessment.

I hope that the above comments are helpful in taking the Neighbourhood Plan forward but please contact me if you have any questions. As set out above, we would welcome the opportunity to discuss the comments we have set out as the Neighbourhood Plan progresses.

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## Appendix 7 – Post Pre-submission Consultation Modifications

In this table, deletions are shown struck through - ~~deletion~~ and insertions are shown underlines – insertion

Page	Para/Policy number	Modification	Reason
Cover		Amend as follows: <del>Pre-Submission Draft Plan – March</del> <u>July 2023</u>	To bring the Plan up-to-date
2	Second paragraph	Amend first sentence as follows:  A neighbourhood plan is, therefore, a community-led <del>planning</del> plan for guiding the future development, regeneration and conservation of an area.	In response to comments
2	No 1	Amend as follows:  <u>This was carried out between 18 March and 5 May 2023. Residents and businesses in the parish received an explanatory leaflet identifying how to view and comment on the Plan. A range of Statutory bodies were also consulted and a drop-in event was held at the Village Hall on 18 March. This is the stage we've now reached. The plan has to be widely consulted on for a minimum of six weeks allowing residents, businesses, landowners and a range of government bodies and service providers to comment on the Draft Plan.</u>	To bring the Plan up-to-date
2	No 2	Amend as follows:  All comments received at the "pre-submission" consultation <del>will be</del> <u>were</u> considered and reviewed and any necessary amendments to the Plan <del>will be</del> <u>were</u> made. The Plan, together with supporting documents <del>will</del> <u>was</u> then <del>be</del> submitted to East Suffolk Council.	To bring the Plan up-to-date
6	1.2	Amend first sentence as follows:  Since the area was designated a number of factors have <del>contrived</del> <u>contributed</u> to delay the actual production of this first draft Plan, including:	In response to comments



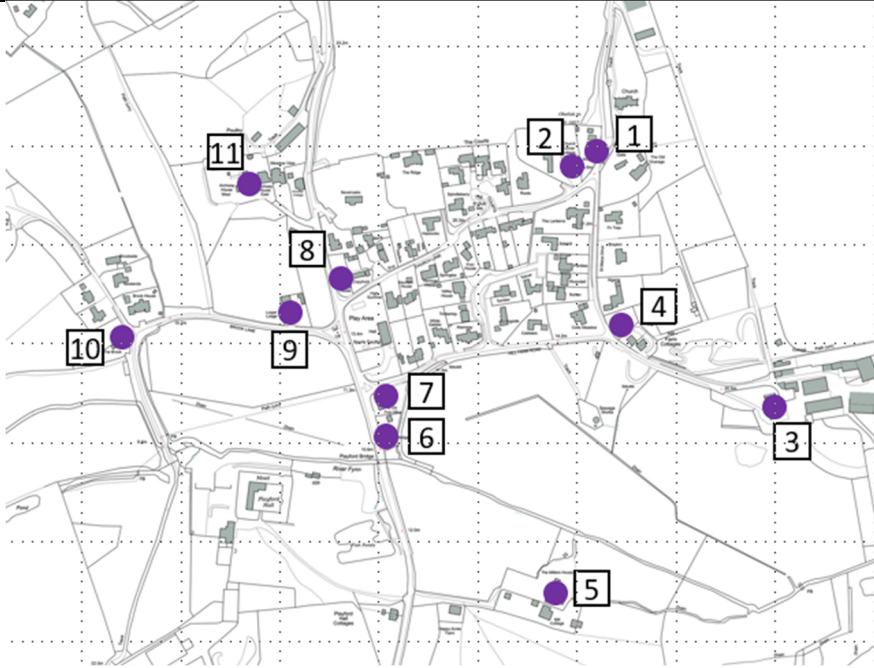
6	1.3	<p>Amend as follows:</p> <p><u>The pre-submission draft Neighbourhood Plan was consulted on between 18 March and 5 May 2023. Amendments to the Plan have been made and it has now been submitted to East Suffolk Council. We are now consulting on this first draft of the Neighbourhood Plan. Once the consultation is complete, the</u> The Plan will <u>now</u> progress through the following stages:</p> <p>Amend the diagram to delete boxes containing the following:</p> <p>Current Consultation 18 March - 5 May 2023</p> <p>Comments Review and Plan Amendments</p> <p>Submission to East Suffolk Council</p>	To bring the Plan up-to-date
7	2.1	<p>Amend final sentence as follows:</p> <p>Despite the proximity of the village to the edge of Ipswich, the larger settlements of Rushmere and Kesgrave, and the A12 corridor, it retains a very rural and 'off <u>the</u> beaten track feel'.</p>	In response to comments
8	2.3	<p>Insert 2 at start of paragraph number:</p> <p><u>2</u>.3</p>	To correct error
12	Maps 5 and 6	Amend maps by making red line thinner	In response to comments
12	5.7	<p>Amend first sentence as follows:</p> <p>Village Centre Cluster As illustrated in Map 5, the area around Butts Road, Church Lane, St Marys Drive and Hill Farm Road qualifies as a "cluster of at least ten dwellings" but neither the Local Plan or the Housing in Clusters and Small Scale Residential Development in the Countryside Supplementary Planning Document define whether the village is "well related" or, in fact, what "well related" means.</p>	In response to comments
13	Policy PFD1	Amend first sentence of policy as follows:	To correct error

		In accordance with the adopted Suffolk Coastal Local Plan, clusters are defined on Maps <del>4 and 5</del> <u>5 and 6</u> .	
15	6.4	Amend second sentence as follows:  The study identified that the Mere incorporates a number of UK Priority Habitats and recommended that the extent of the County Wildlife Site be extended to include the adjacent sandy cliff, <u>which happened in 2019</u> .	In response to comments
16	6.5	Amend third as follows:  Policy SCLP10.1: Biodiversity and Geodiversity seeks to protect and habitats and designated sites of national <u>importance</u> and enhance local biodiversity and geodiversity importance	In response to comments
16	6.6	Amend first sentence as follows:  <del>East Suffolk</del> <u>Suffolk Coastal District</u> Council commissioned the Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018) of the former Suffolk Coastal District and the fringes of Ipswich in support of the Local Plan.	In response to comments
16	6.8	Amend the first sentence as follows:  Recognising <u>the</u> fact that the Fynn Valley had previously been designated as a Special Landscape Area and in the context of paragraph 10.42 of the Local Plan, the Parish Council commissioned the "Fynn Valley Landscape Value Appraisal" to be prepared by Landscape Architect, Lucy Batchelor-Wylam in 2022.	In response to comments
16	6.9	Amend last sentence of third bullet point as follows:  The valley landscape provides setting and backdrop as well as being of historic interest in its own right, understood through the pattern of small and pastoral fields, still arranged within <u>an</u> ancient pattern of enclosures	In response to comments

17	6.10	<p>Amend first sentence as follows:</p> <p>The Appraisal recommended that <del>Landscape and Visual Assessment</del> <u>landscape and visual assessment</u> should be considered a requirement for any development proposed within this area.</p>	In response to comments
18	6.13	<p>Amend first sentence as follows:</p> <p>The parish is rich in wildlife habitats and natural features including a Site of Special Scientific Interest, a County Wildlife Sites and ancient woodland.</p> <p>Amend by inserting new second sentence:</p> <p><u>Across the Parish there is a range of "Priority Habitats" defined in the UK Biodiversity Action Plan and important for conserving biodiversity.</u></p>	In response to comments
19	Policy PFD4	<p>Amend first sentence as follows:</p> <p>Development proposals should avoid the loss of, or substantial harm to, <del>distinctive</del> trees, hedgerows and other natural features such as ponds and watercourses.</p> <p>Amend criterion b. as follows:</p> <p>b. <u>Restoring and repairing fragmented biodiversity networks through</u> the planting of additional native trees and hedgerows of local provenance (reflecting the character of Playford's traditional woodland and hedgerows), and;</p> <p>c. <del>Restoring and repairing fragmented biodiversity networks through, for example,</del> including <u>ecological enhancement of habitats for species of conservation importance such as</u> swift-boxes, bat boxes and holes in fences which allow access for hedgehogs.</p>	In response to comments
24	8.5	<p>Amend third sentence as follows:</p> <p><del>‡</del> <u>The government's Planning Practice Guidance notes that it</u> 'provides a structure that can be used for the content of local design policies, guides and codes, and addresses issues that are</p>	In response to comments

		important for design codes where these are applied to large scale development on single or multiple sites.'	
25	Chart	Amend chart by adding title: <u>Residents' opinions on principles that should influence the design of new homes</u>	In response to comments
25	8.10	Amend first sentence as follows:  As part of the government-funded Neighbourhood Planning Technical Support package, Design <del>Guidelines</del> <u>Guidance</u> and Codes have been prepared for the parish by AECOM Consultants.	In response to comments
26	Policy PFD6	Amend policy as follows:  f. <u>developments are not situated in areas of any form of flooding, and should not result in water run-off <del>would not</del> that would add-to or create surface water flooding, 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 System.</u>  g. adequate provision for the <u>screened and/or</u> covered storage of all wheelie bins and cycle storage is made, as appropriate and in accordance with adopted cycle parking standards;	In response to comments
27	8.11	Amend final sentence as follows:  Developments that do not take this into account and manage their own drainage properly, or that by nature of their construction send groundwater offsite to create flooding elsewhere in the village, will not be <u>supported</u> <del>permitted</del> .	In response to comments
28	8.12	Amend paragraph as follows:  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	In response to comments

		SuDS that are designed <u>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 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.</u>	
28	8.14	Amend first sentence as follows:  Paragraph <del>180</del> <u>185</u> (c) of the NPPF states that planning policies and decisions should “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”	In response to comments
29	9.4	Delete extra full-stop at end of paragraph.	In response to comments
34	Appendix 1	Amend second paragraph as follows:  This Assessment has been prepared to demonstrate how 11 individual or groups of properties that have been identified during the preparation of the Playford Neighbourhood Plan meet the East Suffolk criteria for <del>designation as meeting the criteria for</del> designation as Non-Designated Heritage Assets. Some regard has also been had to Historic England’s guidance on Local Heritage Listing. The Assessment does not include Designated Heritage Assets, as noted on Historic England’s website and identified in Appendix herewith.	In response to comments
34	Appendix 1	Insert following map	In response to comments

			
43	Glossary	Amend definition of Designated Heritage Asset by highlighting Asset	In response to comments