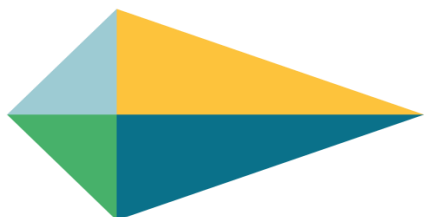


# Responses to Playford Neighbourhood Plan

## Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 10 November 2023 to 19 January 2024

January 2024



**EASTSUFFOLK**  
COUNCIL

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## What is the purpose of this document?

Playford Parish Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

The consultation was due to close on 22 December 2023, however due to the publication of the revised National Planning Policy Framework the consultation deadline was extended until 19 January 2024. East Suffolk Council also received an addendum to the Consultation Statement on 4 January 2024.

This document contains all representations received during the publicity period of 10 November 2023 to 19 January 2024.

## Anglian Water

Anglian Water wish to confirm that we have no further comments on the Playford Neighbourhood Plan Reg 16. Submission, having reviewed the Plan and the Consultation Statement with regard to our consultation response at Reg 14.

## East Suffolk Council

The preparation of the Neighbourhood Plan for Playford is supported and it is considered that overall the Plan complements the strategy and policies contained in the Suffolk Coastal Local Plan and, further, is a well-presented Plan. We have provided comments during the preparation of the Plan, including in response to the Regulation 14 consultation. It is noted that some of the changes suggested as part of the Regulation 14 consultation response have been made, as set out in the Consultation Statement. However, there are some outstanding suggested amendments and matters. Comments on the Submission Neighbourhood Plan are set out below.

The comments set out below represent significant concerns that we believe require further consideration during the examination.

### **Policy PFD1 – Playford’s Clusters**

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.

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 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.

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.

The red line shown on maps 5 and 6 includes the areas that the Neighbourhood Plan defines as having met the criteria of Suffolk Coastal Local Plan policy SCLP5.4 (Housing Clusters in the Countryside). However, the Neighbourhood Plan also defines the red line as the border of the cluster itself. The two are in fact different. Determining the cluster is only the first part and has to be read in conjunction with the criteria of policy SCLP5.4 to determine whether development is acceptable.

### **PFD6 – Design Considerations**

i) Suffolk Parking Standards Guidance (2023), page 64, states that new dwellings should include one charging unit per dwelling, if the number of parking spaces equals or exceeds the number of dwellings. Where the number of parking spaces is less than the number of dwellings then a charging point should be provided for each parking space. Part i) exceeds this requirement in that it states there should be one electric vehicle charging unit for each parking space, regardless of whether the number of parking spaces is greater or less than the number of dwellings. 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.

### **Other Comments**

These comments are often more minor than those above, but the Examiner may still wish to recommend changes to the neighbourhood plan document as a result.

## **Chapter 3 – Planning Policy Context**

### **Page 9, paragraph 3.2**

The text still shows NPPF paragraph 11 as per the 2021 version.

### **Page 9, paragraph 3.5**

The Rural Development SPD is currently undergoing public consultation.

Reference could be made to the adopted Historic Environment SPD and the Healthy Environments SPD, which are both currently being prepared.

## **Chapter 6 – Landscape and Natural Environment**

### **Policy PFD2 – Area of Greater Landscape Value and Sensitivity**

We commend the thoroughness of the landscape policy evidence base in the form of the commissioned landscape appraisal document. This is sensibly based on a review of the former Special Landscape Area designation on the basis that, whilst the SLA designation may have been discontinued, the qualities of the landscape that it covered remain, or at least should be reviewed for their continued existence. This review forms the basis for the new

Neighbourhood Plan policy PFD2 Area of Greater Landscape Value and Sensitivity which is justified by a strong evidence base and which should be supported.

**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.

**Bullet pt 3** - There is a reference to undesignated heritage assets at Hill Farm – wording should be changed from un-designated to non-designated.

**Policy PFD3 – Protection of Important Views**

The policy text provides no definition of what would constitute a detrimental visual impact.

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

There is an unneeded ‘and’ in the opening sentence of policy PFD4 which needs to be deleted (*“Development proposals should avoid the loss of, or substantial harm to ~~and~~ trees, hedgerows and other natural features such as ponds and watercourses. Where such losses or harm are unavoidable:”*).

**Page 21, paragraph 7.2**

It is suggested that for completeness the text should say what grade of listing each building is.

**Page 21, Paragraph 7.5**

There is reference here to the ‘Council’s Heritage Team’. Perhaps this should more specifically refer to East Suffolk Council or it could be misunderstood as the parish council. Also, the text should be amended to refer to Design and Heritage, rather than Design and Conservation.

**Page 21, paragraph 7.7**

The final few words have spread onto the next page.

**Page 22, paragraph 7.8**

Sentence 1 states that ‘Some 11 properties have been identified...’ It would be helpful to state who has identified them,

**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.

**Page 24, paragraph 8.4**

Amend first sentence to read ‘consideration of site and its **context...**’ Context captures more than surroundings.

**Page 24, paragraph 8.5**

There is an error in this sentence: ‘The Guidance notes that provides a structure...’

Given the scale of development likely in the village (and supported by the Plan), the National Design Guide and National Model Design Code aren’t that relevant other than to say that they informed the Playford Design Guidance and Codes document.

**Page 26 - General Design Guidelines for New Development**

Bullet point 3 - ‘Harmonise and enhance existing settlement...’ should read ‘Harmonise with and enhance the existing settlement...’

**PFD6 – Design Considerations**

b) The policy does state that proposals will be supported where they do not involve the loss of gardens ‘which make a significant contribution to the character and appearance of that part of the village;’ However the policy and the Design Guidance and Codes document do not define what is meant by ‘significant contribution’ and this makes the policy problematic. It is suggested that green spaces to be protected from development need to be identified. This is because development will likely be on green land due to the nature of the village so there a need to identify the ‘important open/green/landscaped areas’ similar to what is done in Conservation Area Appraisals.

**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.

**Page 28, paragraph 8.12**

Sentence 3 – Delete brackets from SUDs at the start of sentence 3.

**Page 34, Appendix 1**

Paragraph 1 – Sentence 2 should begin ‘Historic England defines...’ (‘s’ is missing)

It is a suggested that a photograph of each asset is included for ease of identification.

East Suffolk’s criteria for identifying Non-Designated Heritage Assets includes 11 criteria – the table only includes the headings that the criteria sit under. The table for each NDHA should include a row for East Suffolk criteria listing all the criteria that each asset meets.

**Chapter 9 – Services and Facilities**

The neighbourhood plan provides no information about the Education provision for the



children and young people of Playford. Have sustainable cycle and walking routes to early years, primary and secondary education facilities been considered for enhancement? There is a need to consider whether cyclists, pedestrians, wheelchair and pushchair users can safely access educational facilities. Consideration needs to be given as to whether improvement projects are needed and also whether they require community infrastructure levy funding. Other things to consider include maintenance costs, as well as how to finance the replacement of old equipment that has become tired.

### **PFD8 – Parish Services and Facilities**

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?

### **Community Actions**

It would have been helpful to see a separate section on infrastructure with the priorities and any new needs summarised in order of priority for delivery. Playford should then focus their 25% NCIL received from developments approved after the NP is made on delivering these improvements.

### **Maps**

There are discrepancies between the cluster boundaries shown on map 5 (Village Centre Cluster) and map 6 (Brook Lane Cluster) and the property boundaries. The two maps below show where discrepancies occur (these are highlighted by black circles.) If necessary, the Council can assist with the preparation of accurate maps. This list is not exhaustive and if the Parish Council wishes to retain these maps, then a complete review of discrepancies between the red line and property boundaries is recommended.



Please note that these comments are given at an Officer level without prejudice to any future decisions that the Council may make. I would be pleased to respond to any questions that you may have.

## Environment Agency

Thank you for consulting us on the pre-submission plan for the Playford Neighbourhood Plan.

We regret that at present, we are unable to review this consultation. We have had to prioritise our limited resource and must focus on influencing plans where the environmental risks and opportunities are highest.

For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.

### **Environmental Constraints**

We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:

#### **Flood Risk**

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3 of the designated main River Fynn.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the

sequential approach. [National Planning Policy Framework](#) (NPPF) paragraph 161 sets this out.

### **Water Resources**

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licencing strategies (CAMS process) - GOV.UK ([www.gov.uk](http://www.gov.uk)).

### **Flood defences**

We note the presence of Environment Agency maintained flood defences along the River Fynn. Any development located within 8m of the watercourse or defences will need to apply for permits separate from planning and these may not be granted.

### **Informatives**

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and

Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

### **Source Protection Zones**

Your plan includes areas which are located on Source Protection Zones 1, 2 and 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

We trust this advice is useful.

## Historic England

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on [eastplanningpolicy@historicengland.org.uk](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

## Kesgrave Town Council

Kesgrave Town Council are in support of Playford's Submission Draft Neighbourhood Plan.



## Liz Bennett

My husband and I have lived in Playford for approximately 52 years and would rather not see any further dwellings added to the village neighbourhood. We regard Playford as a village, not an urban overspill.

## Ministry of Defence

It is understood that East Suffolk Council are undertaking a consultation regarding the Playford Neighbourhood 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.

Paragraph 97 of the National Planning Policy Framework 2023 requires that planning policies and decisions take into account defence requirements by *'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.'* Statutory consultation of the MOD occurs 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 to Local Planning Authorities by the 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 Playford Neighbourhood Plan 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 photo voltaic panels and their associated infrastructure) are of particular concern.

In addition to the safeguarding zone identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more; and,
- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft

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.

# National Gas (Avison Young)

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

## About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

## Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

## Distribution Networks

Information regarding the gas distribution network is available by contacting: [plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

## Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Matt Verlander, Director**

[nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street

Newcastle upon Tyne  
NE1 3AZ

**Kam Liddar, Asset Protection Lead**

*\*email address redacted\**

National Gas Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded

here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

## National Grid (Avison Young)

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### **About National Grid Electricity Transmission**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

### **Proposed development sites crossed or in close proximity to NGET assets:**

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to NGET infrastructure.

### **Distribution Networks**

Information regarding the electricity distribution network is available at the website below: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

### **Further Advice**

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Matt Verlander, Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Tiffany Bate, Development Liaison Officer**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid Electricity Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)



## National Highways

Thank you for your correspondence, dated 10 November 2023, notifying National Highways of the above Neighbourhood Plan.

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 A12.

We have reviewed the neighbourhood plan. Both the area and the location that is covered are remote from the nearest Strategic Road Network. Consequently, the draft policies set out are unlikely to have an impact on the operation of the trunk road and we offer No Comment.

### **Informative:**

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The National Planning Policy Framework supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

# Natural England

## Playford Neighbourhood Plan – Regulation 16 Consultation

Thank you for your consultation on the above dated 10 November 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.

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.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/) .

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park or Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)<sup>4</sup> website and also from the [LandIS website](#)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

#### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

#### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

#### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced

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<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

### **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains

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<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

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<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

## Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Playford Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre- submission consultation stage.

However, as per email communications with the parish council, East Suffolk Council officers, and the neighbourhood planning consultant, please be aware that many of the comments made by SCC appear to have been missed, and therefore have not been included or addressed within the consultation statement.

As this is the submission draft of the Plan, the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in ~~strikethrough~~.

### Meeting the Needs of an Ageing Population

Within SCC's response to the pre-submission (Regulation 14) consultation stage, the following was stated:

"SCC welcomes the population data supplied in paragraph 2.1.3 of the Design Guidance and Codes and suggests referring to Suffolk Observatory<sup>1</sup> for more recent data. Suffolk Observatory shows [...] 22% of residents are aged 65+ which is above the England average of 18.5%.

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

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<sup>1</sup> <http://www.suffolkobservatory.info/>

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. [...]"

Following guidance from footnote 52 in the NPPF December 2023; "Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties."

Whilst SCC acknowledges that the Ministerial Statement 2015 referenced in the Consultation Statement indicates that neighbourhood plans should not set additional technical standards; however, SCC was not proposing that the plan should impose a requirement for M4(2).

SCC recommended that the plan set out a positive position towards proposals which contain homes built to those standards, in accordance with footnote 52 of the NPPF December 2023.

This will help the plan meet the needs of a wider range of groups including older and vulnerable people.

Therefore, the following additional wording is proposed to be added to Policy PFD6 Design Considerations:

"[...] proposals will be supported where:

*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."*

The Planning Practice Guidance<sup>2</sup>, paragraph 001 indicates that "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing" and "an ageing population will see the numbers of disabled people continuing to increase and it is important we plan early to meet their needs throughout their lifetime" (paragraph 002).

### Other Comments

As per email correspondence between SCC, East Suffolk Council, and the Parish Council and their consultant, the majority of the comments raised as part of the Reg14 consultation have not been included or addressed in the Consultation Statement. The Consultation Statement does include some of the comments made during the Reg14 consultation, up to approximately halfway down page 4 of 11.

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<sup>2</sup> <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>



Please see the below Appendix, which details the missing comments of our Reg14 response letter, which was submitted to Playford Parish Council, on 04 May 2023.

## **Appendix: Reg14 comments from SCC that were missed from the Consultation Statement**

### Health and Wellbeing

#### *Active Travel and Air Quality*

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

**“Active and Sustainable Travel**

**10.9 It is important to improve air quality and mitigate any risk to human health due to man-made emissions such as nitrogen oxides and particulate matter. Encouraging and facilitating active and sustainable travel can reduce vehicles on the road and therefore pollution and poor air quality, as well as improve people’s mental and physical health.”**

Further, for the Neighbourhood Plan Group to consider – SCC believes that new developments should enable residents and users to move in and around the village using non-motorised forms of transport, including those with limited mobility. This can be done by the addition of benches, including ‘Chatty Benches’<sup>3</sup>. This could help to make an elderly population feel more included as part of the community and reduce the isolation of vulnerable groups. It is suggested that this could be a Community Action.

### Minerals and Waste

Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means that SCC makes planning policies and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan<sup>4</sup>, adopted in July 2020, which forms part of the Local Development Plan.

#### *Chapter 3 Planning Policy Context*

We note that there is no mention of the Suffolk County Council Minerals and Waste Local Plan 2020 in Section 3. This should be considered within the planning policy context as it forms part of the development plan for the county and “would need to be taken into consideration when proposing development”

Therefore, the following wording is proposed to follow paragraph 3.5:

<sup>3</sup> <https://healthwatchesuffolk.co.uk/news/are-you-happy-to-chat-it-starts-with-hello>

<sup>4</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/>

“3.6 Consideration should be given to the adopted Suffolk County Council Minerals and Waste Local Plan 2020, which sets out planning policies in relation to minerals extraction and safeguarding, and waste management throughout the county, and forms part of the development plans for the area.”

#### *Safeguarding and Consultation Area*

The whole settlement of Playford is within the minerals safeguarding/consultation area. This means that Policy MP10: safeguarding of the Suffolk County Council Minerals and Waste Local Plan 2020 will apply. This area can also be viewed on the Interactive Map of Waste Locations of Interest<sup>5</sup> by enabling the “consultation area” overlay (this can be activated via the tab in the lower right corner).

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

#### Natural Environment

##### *Policy PFD2 and Landscape Character / Key Views / Settlement Gaps*

As paragraph 6.2 notes, the Fynn Valley area of Playford parish used to be designated as SLA in the old Suffolk Coastal Local Plan, a designation that is not carried into the new Local Plan.

Further, SCC understands that the parish commissioned the “Fynn Valley Landscape Value Appraisal” in 2022 as noted in paragraph 6.8, concluding that the lower Fynn Valley in Playford is of higher value and worthy of designation as an area of Greater Landscape Value and Sensitivity (AGLVS).

SCC welcomes the suggested area illustrated on Map 7 and anchored in Policy PFD2 - Area of Greater Landscape Value and Sensitivity. SCC notes, however, that Policy PFD2 does not cover development outside AGLVS, which could still impact it as noted in paragraph 6.10. We therefore suggest following amendment:

“Development proposals in or adjacent to the Area of Greater Landscape Value and Sensitivity will be permitted only where they: [...]”

SCC notes that typically in Neighbourhood Plans, similar policies have been titled as “Area of Local Landscape Sensitivity (ALLS)” or as “Valued Landscape” and the Neighbourhood Planning Group should consider consistency with other Neighbourhood Plans.

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<sup>5</sup> <https://scc-planning.github.io/minerals-waste-map/>

*Policy PFD3 - Protection of Important Views*

Map 8 and Policy PFD3 are welcomed. We suggest a minor amendment to the second sentence of Policy PFD3, as below:

“Any proposed development should not have a significant detrimental visual impact [...]”

This amendment would strengthen the intent of the Policy.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### *Local Green Spaces*

It seems to be a missed opportunity that no Local Green Spaces are proposed to be designated in the Plan. The Playford Design Guidance and Codes document recognises that Playford has several open spaces:

- Part 1.2 refers to the open space at the Village Hall;
- Part 2.2.1 further refers to the playground there, playing fields and the churchyard of St Mary’s Church; and
- Part 3.2.4 states that “Playford has several public open spaces located around the village” and provides guidance on their preservation and enhancement, explicitly mentioning the protection of these open spaces.

SCC suggests that a Local Green Space policy (aligned with paragraphs 105-107 of the NPPF December 2023) would be a beneficial improvement to the Plan, supported by a Local Green Spaces site appraisal, thereby ensuring that these important local green spaces are protected from being destroyed as an adverse impact of any development proposals.

#### *Policy PFD6 - Design Considerations*

We note that Policy PFD6 - Design Considerations refers to landscape character in Part a, and gardens and open spaces in Part b, which is welcome. However, Part b could be strengthened through the following amendment, to include biodiversity as a consideration.

“b. they do not involve the loss of gardens, important open, green or landscaped areas, which are valued assets for make a significant contribution to the biodiversity, and make a positive contribution to the character and appearance of that part of the village;”

*Policy PFD7 - Artificial Lighting*

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

*Policy PFD9 - Public Rights of Way*

SCC welcomes Policy PFD9 as it recognises the potential value of public rights of way for biodiversity and support the ask to enhance their biodiversity as part of development proposals seems reasonable and justified.

Public Rights of Way*Policy PFD9 - Public Rights of Way*

SCC welcomes Policy PFD9, however, we wish to highlight that the link between improving and extending the existing PROW network with biodiversity corridors can lead to on-going maintenance issues with vegetation growth as highlighted by residents and captured in paragraph 10.10. It should be noted that PROW in open corridors dry out better, providing year-round use, compared to those within vegetated, and consequently shaded, corridors.

SCC notes paragraph 10.4, which states that Neighbourhood Plans “have little power to introduce highway improvements”. Neighbourhood plans can provide significant weight to support County and District Councils in obtaining CIL and Section 106 funding and reaching Section 278 agreements with developers to fund highway improvements, thus bringing in external resources.

Transport

SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe as well as providing and managing flood risk for highway drainage and roadside ditches.

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

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

*Policy PFD6 - Design Considerations*

The design policy refers to parking in part d, but should make specific reference to the Suffolk Guidance for Parking 2023<sup>6</sup>, as follows:

“d. in accordance with adopted standards, the safety of the highway network is maintained or enhanced, ensuring that all vehicle parking is provided within the plot and that spaces and garages meet the adopted minimum size standards as set out in the Suffolk Guidance for Parking 2023 or any successor documents;”

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<sup>6</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>

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

*“g. adequate provision for the covered storage of all wheelie bins and secure cycle storage is made, as appropriate and in accordance with adopted cycle parking standards in the Suffolk Guidance for Parking 2023 or any successor documents;”*

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

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

#### *Community Action 3 - Traffic Calming*

SCC acknowledges this community action, and will welcome engagement from the community. Please note that traffic calming is not considered suitable for A and B class roads, bus routes, or roads with inadequate street lighting.

#### *Community Action 4 - 20mph speed limits*

SCC notes that there is a desire to implement a 20mph limit to the village as noted in Community Action 4, the following criterion originate from SCC 20mph speed limit policy<sup>7;8</sup>.

Unless in exceptional circumstances, locations will not be considered for 20mph schemes where any of the following apply:

- they are on A or B class roads;
- they have existing mean speeds above 30 mph;
- there is no significant community support as assessed by the local County Councillor.

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

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

#### *Community Action 5 - HGVs*

We acknowledge the concern of HGVs travelling through the village. Please note that there

<sup>7</sup> <https://www.suffolk.gov.uk/asset-library/imported/20mph-speed-limit-policy-criteria.pdf>

<sup>8</sup> <https://www.suffolk.gov.uk/roads-and-transport/traffic-management-and-road-safety/speed-limits>

are two types of weight restrictions used on roads in Suffolk; environmental weight restrictions and weak bridge restrictions<sup>9</sup>.

SCC has recently undertaken a review of recommended lorry routes through Suffolk, which is displayed on a map<sup>10</sup>. This map shows the closest recommended access route is through Kesgrave. This does not however prevent lorries from using other roads within the county, as they may be required for access to facilities in the surrounding villages.

### *Design Guidance and Codes*

SCC would recommend that the Playford Design Guidance and Codes make specific reference to Suffolk Guidance for Parking and the Suffolk Design: Streets Guide 2022<sup>11</sup>.

### General

Policy PFD1 refers to Maps 4 and 5, but should refer to Maps 5 and 6.

There is a graph shown on page 25 of the plan, but as there is no legend/title, figure number, caption, or key, and thus it is not clear what is being displayed.

### *Renewable Energy*

SCC highlights that considering the Climate Emergency (as declared by Suffolk County Council in March 2019<sup>12</sup>) all development should be sustainable. SCC notes that there are only brief mentions of renewable energy in the plan, and it is suggested that this concept could be incorporated into policy, along with sustainable design. There could be the specific support for proposals that include sustainable design, including rainwater harvesting, and the inclusion of renewable energy features, such as solar panelling on roofing. Policy PFD1 refers to Maps 4 and 5 but should refer to Maps 5 and 6.

### *Policies Map*

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

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

This map should display the following: neighbourhood plan area boundary, Clusters boundaries, Listed Buildings and/or heritage assets, important views, public rights of way,

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<sup>9</sup> <https://www.suffolk.gov.uk/roads-and-transport/lorry-management/weight-limits>

<sup>10</sup> <https://www.suffolk.gov.uk/roads-and-transport/lorry-management/lorry-route-plan-review-in-suffolk>

<sup>11</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas>

<sup>12</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/initiatives/our-climate-emergency-declaration>

the Area of Greater Landscape Value and Sensitivity, and any other important features, services and facilities of the parish.

Inset maps may be used to show closer detailed parts of the parish, where identified features would be lost and/or hard to read on the overall Policies Map.

**[Appendix ends]**



## Suffolk County Council

Thank you for consulting Suffolk County Council on this Addendum to support the Reg16 consultation.

We are disappointed to note that there are no proposed changes to the draft plan as a result of our comments raised within this Addendum, which were submitted as part of the Reg14 response letter.

SCC has already provided comments on the Reg16 consultation, via email to East Suffolk Council, dated 22 December 2023. These comments still apply.

SCC's main concerns were flagged directly with the planning consultant, via email dated 13 December 2023. These have been discussed in further detail below, as the Addendum document indicates that the parish council believes our proposed amendments are "not necessary".

The NPPF states at paragraph 16, part c), that plans should:

"be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees"

SCC believes that the steering group of this plan have not effectively engaged with SCC, who is a statutory consultee. We believe that our comments raised at Reg14 stage, which have been included as this Addendum, have not been duly considered.

Page 2 of the Reg16 draft of the Playford neighbourhood plan states:

"2 Submission of Draft Plan to East Suffolk Council  
All comments received at the "pre-submission" consultation were considered and reviewed and any necessary amendments to the Plan were made."

SCC believes that the comments and suggestions that were raised as part of our Reg14 response, and addressed in this Addendum, have not been adequately "considered and reviewed", as stated.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in ~~strikethrough~~.

Minerals and Waste

During the Reg14 consultation, SCC recommended including reference to the Suffolk Minerals and Waste Local Plan 2020<sup>1</sup> (SMWLP).

This document forms part of the development plan for the area, in the same way as the adopted Suffolk Coastal Local Plan is, and therefore SCC recommends that it should also be included in the Playford Neighbourhood Plan.

The Glossary of the Reg16 neighbourhood plan states:

“Development Plan: The Development Plan for an area is a suite of Local Plan and Neighbourhood Plan documents for a local planning authority area, setting out the policies and proposals for the development and use of land and buildings. It includes Minerals and Waste Local Plan documents prepared by the County Council. It is the starting point for the determination of planning applications.”

Therefore, the parish council are aware that the SMWLP is part of the development plan for the area.

Under paragraph 8(2) Schedule 4B to the Town and Country Planning Act, Basic Condition C states:

“The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)”.

The parish council response from the Addendum document states that:

“The Local Plan does not make reference to the Minerals and Waste Local Plan”.

That is incorrect. There are references to the SMWLP in the adopted Suffolk Coastal Local Plan, including in the Glossary, which uses the exact same terminology that the Parish Council have used in their Glossary to the Playford Neighbourhood Plan.

SCC would also like to note, as stated in our Reg14 response, that the whole settlement of Playford is within the minerals safeguarding/consultation area. This means that Policy MP10: safeguarding of the Suffolk County Council Minerals and Waste Local Plan 2020 will apply.

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

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<sup>1</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme>

Therefore, the Playford neighbourhood plan should be amended to include the following wording in relation to the SMWLP, as it forms part of the development plans for the area:

*“3.6 Consideration should be given to the adopted Suffolk County Council Minerals and Waste Local Plan 2020, which sets out planning policies in relation to minerals extraction and safeguarding, and waste management throughout the county, and forms part of the development plans for the area.”*

#### Suffolk Guidance for Parking, and Suffolk Design Streets Guide

The Suffolk Guidance for Parking<sup>2</sup> is “technical guidance” that forms Suffolk County Council’s recommended approach for planning authorities to use when determining planning applications. The document will be used as a guide by planning officers in determining appropriate parking for their areas.

The Suffolk Design Streets Guide<sup>3</sup> is a guidance document designed to assist the delivery of well-designed places in line with the National Design Guide as well as the National Model Design Code. The Streets Guide will be used by Suffolk County Council’s highway engineers, drainage engineers and Public Rights of Way officers in responding to planning applications.

SCC recommends that the Playford Design Guidance and Codes documents and the Playford Neighbourhood Plan make specific reference to Suffolk Guidance for Parking (2023, or any successor document) and Suffolk Design: Streets Guide 2022.

The Suffolk Coastal Local Plan states in Policy SCLP7.2: Parking Proposals and Standards:

“Proposals will be expected to have regard to the parking standards contained in the Suffolk Guidance for Parking (including subsequent revisions),”

Local planning authorities will take this guidance into account when determining planning applications. It is recommended to include references to these guidance documents in the plan, to ensure that developers are aware that they will need to adhere to these standards.

#### Policy Map

During the Reg14 consultation, SCC noted that the Playford Neighbourhood Plan does not have a Policies Map.

<sup>2</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>

<sup>3</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas#:~:text=The%20Streets%20Guide%20is%20a,the%20National%20Model%20Design%20Code>

Whilst Maps 1, 7, 8 and 12 do display some of the relevant components of a policy map, none are sufficiently detailed to be classified as the Policy Map for the Plan. There also needs to be a clear Key to assist with identifying the displayed features.

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

This map should display the following: neighbourhood plan area boundary, Clusters boundaries, Listed Buildings and/or heritage assets, important views, public rights of way, the Area of Greater Landscape Value and Sensitivity, and any other important features, services and facilities of the parish.

Inset maps may be used to show closer detailed parts of the parish, where identified features would be lost and/or hard to read on the overall Policies Map.

The response from the Parish Council in the Addendum document was:

“This is not considered Necessary”

Paragraph 23 of the NPPF states:

“Broad locations for development should be indicated on a key diagram, and landuse designations and allocations identified on a policies map.”

Locality<sup>4</sup> guidance document “Writing Planning policies – a toolkit for neighbourhood planners” states on page 24:

“If you have site specific policies then you need to include a clear map showing the location and boundaries.”

Whilst a Policies Map is not strictly a requirement for neighbourhood plans, SCC would recommend the inclusion of one, for context and ease of reading.

The NPPF states at paragraph 16, part d):

“16. Plans should: [...]

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;”

Policies maps reduce ambiguity of plans, and help to provide clarity for any future planning officers who are making planning decisions in Playford.

### Community Action 3

At Reg14 stage consultation, SCC raised the following concern regarding Community Action 3:

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<sup>4</sup> <https://neighbourhoodplanning.org/toolkits-and-guidance/>

“SCC acknowledges this community action, and will welcome engagement from the community. Please note that traffic calming is not considered suitable for A and B class roads, bus routes, or roads with inadequate street lighting.”

The response from the Parish council in the Addendum document stated:

“There are no A or B class roads in Playford.”

SCC notes that this is true, however would raise the issue that there appears to not be adequate street lighting in Playford to implement traffic calming measures. Details regarding traffic calming are set out on SCC’s webpage<sup>5</sup>.

The community action sets out the desire to:

“install traffic calming points at the entrance to the village.”

Neither the northern nor southern access to the village via Butts Road would likely be suitable for traffic calming, due to the lack of street lighting.

The access into the village via Church Road is also unlikely to be suitable for traffic calming, again due to the lack of street lighting.

Agreement would need to be reached with the Highway Authority for any traffic calming measures.

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<sup>5</sup> <https://www.suffolk.gov.uk/roads-and-transport/traffic-management-and-road-safety/traffic-management#:~:text=Traffic%20calming%20measures%20such%20as,safety%20for%20pedestrians>

# Suffolk Wildlife Trust

Thank you for sending us details of the Playford Neighbourhood Plan, please see our comments below:

Following our previous response to the Regulation 14 consultation, Suffolk Wildlife Trust are pleased to see that the Playford Neighbourhood plan continues recognises the importance of biodiversity and seeks to ensure its protection and enhancement within Policy PFD4 and would like to reiterate our thoughts on how the policy could deliver more for nature.

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

We recommend that this policy should specifically reference the protection of Sinks Valley Site of Special Scientific Interest (SSSI) all five County Wildlife Sites (CWSs) within the Parish, alongside Priority Habitats including hedgerows, coastal and floodplain grazing marsh, lowland fens, deciduous woodland, wood pasture and parkland, hedgerows, and ponds, offering further detail of the valuable habitats for nature within Playford.

The proposed policy PFD4 notes that acceptable development will be supported where a measurable net gain in biodiversity is provided. This can be strengthened in the policy wording by reference to the national minimum of 10% net gain and could include an aspiration for development in Playford to deliver above the minimum level, aiming for 20% net gain. This level gives far greater confidence in delivering genuine ecological benefits, ensuring that development contributes to nature recovery; I have included further information on this below.

As per our response to the Regulation 14 consultation, we support the aspiration to restore and repair biodiversity networks through the planting of native trees, hedgerows, and woodlands; this could include reference to natural regeneration of woodland as well as planting.

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). This is supported by RIBA who state: *As a guideline, the number of built-in provisions of nest or roost sites per development should be approximately the same as the number of residential units.*<sup>1</sup>
- Any impermeable boundary fences installed include access for hedgehogs (with hedgerows a preferred boundary where appropriate).

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<sup>1</sup> <https://cieem.net/resource/designing-for-biodiversity-a-technical-guide-for-new-and-existing-buildings-2nd-edition/>

- Further enhancement options such as hedgehog houses, invertebrate boxes, and bee bricks should be widely considered.

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. All bird boxes integrated into buildings should follow *BS 42021:2022 Integral nest boxes. Selection and installation for new developments. Specification<sup>2</sup>*.

We reiterate our comments from the previous consultation: 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.

### **Community Action 1 – Wildlife Corridors<sup>3</sup>**

Suffolk Wildlife Trust remain 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. These corridors can be formally mapped and shared with neighbouring communities to allow a fully coordinated approach.

### **In Support of Playford Neighbourhood Plan Aspiring to Deliver 20% Biodiversity Net Gain**

The 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.

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. Other recent Neighbourhood Plans in Suffolk have included wording in support of 20% Biodiversity Net Gain, and we believe a similar aspiration can work in Playford.

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

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<sup>2</sup> <https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1?version=standard>

<sup>3</sup> Wildlife corridors / ecological networks/ connecting greenspace can all relate to the same features, such as hedgerows and rivers.

that will be required on each site.’<sup>4</sup>, suggests that it is reasonable to include this aspiration within the Playford Neighbourhood 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% 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.

Please do not hesitate to contact us should you require anything further.

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<sup>4</sup> Confirmed Minutes - Cabinet - 1 February 2022 TR.pdf

<sup>5</sup> Local Plan Viability Study (swale.gov.uk).

<sup>6</sup> Greater Cambridge Local Plan First Proposals (greatercambridgeplanning.org)