



Ufford Neighbourhood Plan Referendum

Summary of Representations

This document contains summaries of the representations made in response to the publication of the Submission Ufford Neighbourhood Plan which was held between 20 November and 15 January 2025. The full representations were submitted to the Examiner for consideration during the Examination of the Ufford Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

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

Respondent	Summary of representations
Anglian Water	<p>The response was overall supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.</p> <p>Anglian Water recommended that the developer of the UFF16 Former Crown Nursery site allocation engage in pre-application communication with them to assess water infrastructure capacity requirements. Anglian Water recommended that the neighbourhood plan included supporting text that encouraged this.</p> <p>Anglian Water encouraged the neighbourhood plan to include a policy requirement for water efficiency in new homes of the equivalent of 100 litres used per person per day (this would be a slightly higher standard than the Local Plan's policy requirement for 110 litres per person per day, which is based on the Building Regulations optional requirement).</p> <p>Anglian Water was supportive of measures to address surface water run-off, including the preference for this to be managed using Sustainable Drainage Systems (SuDS) and requiring permeable surfaces for new areas of hardstanding within developments to comply with the drainage hierarchy.</p>

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	<p>The reference under Policy UFF15 criterion (g) requiring separate systems for surface water and foul water being provided was welcomed.</p> <p>Anglian Water supported the wording of Policy UFF5: Local Green Spaces, Policy UFF6: Landscape Character and The Water Meadows and Policy UFF8: Biodiversity/nature conservation.</p> <p>Anglian Water made the comment that there may be benefit in referencing the Suffolk Local Nature Recovery Strategy (Local Nature Recovery Strategy (LNRS) - Suffolk County Council) which maps specific areas for improving habitats for nature recovery.</p> <p>Regarding Policy UFF9: Ecological corridors, Anglian Water requested that the neighbourhood plan group clarify with them which areas are covered by the policy (as the map scale means this is unclear), as there may be implications for investment/engineering works needed to serve the local community on assets owned by Anglian Water within this area. They objected to the land south of Spring Lane (which includes a sewer pumping station) being included in the corridor designation and requested it be removed.</p> <p>Anglian Water commented that the diagram on p. 26 Design Guidelines and Codes should be amended to show "highly water-efficient devices" rather than "highly waste-efficient devices".</p> <p>Anglian Water also commented that water efficiency is not adequately covered in the Section 4.1 Checklist (pages 57 – 63), and that permeable surfacing for parking and other hard standing areas should be listed under checklist 10.</p>
Landex Ltd	<p>The response supported the allocation and overall content of Policy UFF16 Former Crown Nursery Site. The respondent commented that the land is available and deliverable in accordance with the policy, subject to detailed design matters related to public realm areas.</p>
Sport England	<p>The response set out overall support for the plan and welcomed the amendments that had been made since Sport England's consultation response at Regulation 14 stage. Additionally, the response set out the importance of complying with the National Planning Policy Framework, and provided some additional information related to sport and the role of Sport England in planning.</p>
East Suffolk Council	<p>The Council's response provided detailed comments on several policies and supporting text sections of the plan, but raised no 'basic conditions' objections to the plan. The comments made by the council are summarised below:</p>

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	<p>General comments – the response raised that various policies could be shortened or potentially removed. Inclusion of hyperlinks in the context was encouraged, and updating paragraph references and extracts to the 2024 NPPF was stated as required. Additionally, a number of grammatical errors and wording changes were highlighted within the response.</p> <p>Policies and projects – the response raised that Figure 21 combines items for precept spend with CIL-funding eligible items. It was suggested that this list is separated into two lists and further detail is provided on each project. It was also recommended that further information is added in regard to the need for a new burial ground.</p> <p>Policy UFF1 Design – the response noted the lengthy criteria list, and suggests shortening this. Specific amendments to the policy text are identified relating to typographical errors, orientation of homes towards public spaces, shortening of the parking criteria, and changes to the landscaping criteria. The response also references relocation of policy criteria from Policy UFF15 New and Existing Business to UFF1 Design.</p> <p>Policy UFF2 New Housing – the response commented that this policy could be removed to shorten the document as sections repeat policies within the East Suffolk Council – Suffolk Coastal Local Plan.</p> <p>Policy UFF3 Housing Mix – the response outlined support for this policy in principle, highlighting the affordable housing tenure mix, though raised concerns over the potential viability impacts of the proposed 50% discount on First Homes.</p> <p>Policy UFF4 Rural and Community Led Exceptions Sites – the response included the suggestion that this policy be either shortened or removed, as there is some repetition with other policies within the document and the East Suffolk Council – Suffolk Coastal Local Plan. The response provides some suggested amendments to the text if it is retained.</p> <p>Policies UFF5 Local Green Spaces, UFF6 Landscape Character and The Water Meadows & UFF7 Important Views – The response set out overall support in principle for these policies.</p> <p>Policy UFF8 Biodiversity – The response suggested some amendments to be added to this section for accuracy and consistency with Policy UFF1 Design.</p> <p>Policy UFF9 Ecological Corridors – The response set out overall support for this policy in principle.</p>

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	<p>Policy UFF10 Historic Environment – The response noted a typographical error in the supporting text of this policy.</p> <p>Policy UFF11 Non-designated Heritage Assets – the response set out overall support in principle for this policy.</p> <p>Policy UFF12 Dark Skies – the response set out overall support for this policy in principle, and suggested a minor amendment to the wording to provide further detail.</p> <p>Policy UFF13 Access and Connections – the response encouraged the inclusion of a cross-reference to the Healthy Environment SPD’s guidance on active travel infrastructure.</p> <p>Policy UFF14 Community Facilities – the response set out overall support in principle for this policy, but noted that there was some repetition within the first two paragraphs with Policy SCLP8.1 Community Facilities and Assets of the East Suffolk Council – Suffolk Coastal Local Plan. The response also suggested the inclusion of priority ranking for the delivery of new/improvements to community facilities.</p> <p>Policy UFF15 New and Existing Businesses – the response suggested that the reference to home working spaces in this policy be moved to UFF1 Design.</p> <p>Policy UFF16 Former Crown Nursery Site – the response commented that criterion (a) should simply state that a third of the housing should be Affordable Housing, consistent with the requirement in Policy SCLP5.10 Affordable Housing on Residential Developments of the East Suffolk council – Suffolk Coastal Local Plan. The response also commented that some specific sections could be reduced in length or moved, and identified amendments to the text to increase clarity. The response requested that rationale is provided for the requirement of specifically 8 allotments. It was also requested that an Ecological Impact Assessment is highlighted as a requirement within the policy or supporting text. The response also suggested amendments to the text to make clear which areas are required to be conveyed to the Parish Council.</p>
Environment Agency	<p>The response set out overall support for the plan, and provided some detailed comments that have been summarised below:</p> <p>The response acknowledged that the requirement for cemetery provision had been identified, and referenced guidance that should be considered.</p>

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	<p>The response raised support for the development of brownfield sites in Policy UFF15 New and Existing Business and Policy UFF16 Former Crown Nursery Site. The response referenced guidance that should be considered.</p> <p>The response highlighted the support for references to SuDS in policies UFF1 Design, UFF8 Biodiversity and UFF16 Former Crown Nursery Site, but raised the point that SuDS are not appropriate on all sites. The response referred to specific guidance that should be considered.</p> <p>The response raised the omission of reference to the importance of the underlying aquifer. The response encouraged amendments to include specific guidance on groundwater protection.</p> <p>The response suggested the inclusion of relevant policies to cover the management of flood risk.</p> <p>The response raised the threat of scarce water resources and recommended the Parish Council have discussions with the water company (Anglian Water) about capacity. The response supported higher standards of water efficiency than policy minimums.</p> <p>The response identified that the plan includes areas which are located in Source Protection Zone 3. They suggested that this should be considered if growth and development is proposed in these locations. The response provided a reference to additional information and guidance.</p> <p>The response also encouraged the Parish Council to seek ways in which the plan could improve the local environment, and to identify sites for biodiversity net gain. The response provided reference to guidance on neighbourhood planning that had been produced jointly with Natural England, Historic England and the Forestry Commission.</p>
Christopher Goodall	The response requested further detail and clarification on Local Green Space 6: 'Three triangular grassed areas on Loudham Lane at junctions of East Lane, Spring Lane and The Avenue.'
Historic England	Historic England did not provide any specific comments on the Ufford Neighbourhood Plan submission version.
National Highways	The response set out overall support for the Ufford Neighbourhood Plan and did not raise any further specific comments.
Natural England	Natural England did not provide any specific comments on the Ufford Neighbourhood Plan submission version.

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Suffolk County Council	<p>The response set out overall support for the Ufford Neighbourhood Plan following the changes made from the Reg 14 consultation. The response raised that the Suffolk Minerals and Waste Local Plan (2020) should be referenced in the National and Local planning policy context section. Additionally, the response also suggested the addition of location maps for the identified Local Green Spaces.</p>
Suffolk Wildlife Trust	<p>The response set out overall support for the Ufford Neighbourhood Plan, and made specific reference to supporting the Environment objective, Policy UFF8: Biodiversity and Policy UFF9: Ecological corridors.</p> <p>The response gave support in principle for the inclusion of a 20% Biodiversity Net-Gain ambition. The response raised the omission of County Wildlife Site 'Hospital Grove' within the Neighbourhood Plan.</p>