

Responses to the Ufford Neighbourhood Plan

Regulation 16: Publicising a Neighbourhood Plan

Publicity period: 20th November 2024 to 15th January 2025

Published January 2025



Responses

Anglian Water2

Landex Ltd8

Sport England.....9

East Suffolk Council.....13

Environment Agency.....23

Christopher Goodall.....27

Historic England28

National Highways29

Natural England30

Suffolk County Council.....31

Suffolk Wildlife Trust.....34

What is the purpose of this document?

Ufford 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.

This document contains all representations received during the publicity period, which ran from 20th November 2024 to 15th January 2025.

Anglian Water

Detailed response on the draft neighbourhood plan

The comments set out below are made, ensuring the making of the plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water. Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.

Policy UFF1: Design

Parking – see comments below on the need for permeable surfaces for areas of hard-standing such as parking.

Sustainability and drainage – see comments below which cover these matters.

Policy UFF2: New Housing

Policy UFF4: Rural and community led exceptions sites

Policy UFF15: New and existing business

Policy UFF16: Former Crown Nursery

Infrastructure capacity

The neighbourhood plan includes policies on the consideration of development proposals which may come forward within the area i.e. Policies UFF2, UFF4 and UFF15. Policy CCF16 is a specific housing allocation policy for 20-25 dwellings. Infrastructure capacity is, therefore, a key consideration and it is relevant to require new development to be served by a sustainable provision.

In accordance with Policies SCLP3.5: Infrastructure Provision and SCLP9.7 Holistic Water Management of the Suffolk Coastal Local Plan (2020), developers will need to demonstrate that there is sufficient water available to support the proposed development and that adequate mains foul water treatment and disposal already exists or can be provided in time to serve the development.

It is recommended that developers undertake pre-planning engagement with Anglian Water at the earliest opportunity to assess infrastructure capacity, and any specific requirements that may be needed to deliver the proposed development, which may include sustainable points of connection (SPOC) to our water supply and wastewater networks to minimise impacts on existing communities and the environment. Developing (anglianwater.co.uk). This is to ensure that connections or any upgrades to our network are addressed when

planning applications are submitted to the local planning authority. It is imperative that there is sufficient capacity or the ability through a phased approach to support new development prior to the sites being occupied for use. This may need to be secured using appropriate planning conditions.

The neighbourhood plan group may wish to include some wording to reflect the above or a suitable cross reference to the relevant Local Plan Policies; so that proposals demonstrate this and to ensure that development does not result in a detrimental impact on the environment and water infrastructure, including sewers and surface water and other flooding. This should also take account of climate change.

Water resources

As a region identified by the Environment Agency as seriously water stressed, we encourage measures to improve water efficiency in developments. This can be achieved by a fixtures and fittings approach, including through rainwater/ storm water harvesting and reuse, and greywater recycling. Such measures to improve water efficiency standards and opportunities for water reuse and recycling also reduces the volume of wastewater needed to be treated at our water recycling centres. This will help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water.

Given the proposed national focus on water efficiency, Anglian Water encourages local plans and neighbourhood plans to cover this issue through a policy-based approach. Anglian Water has produced a Water Efficiency Protocol with other partners (the Environment Agency, Natural England and Cambridge Water) on the imperative for development plan policies to achieve tighter water efficiency standards than the optional standard of 110 litres per person per day (l/p/d) for new homes. The standard of 110 litres is included in the Suffolk Coastal Local Plan under Policy SCLP9.2 Sustainable Construction.

This position is reinforced by the direction taken by the Government Department DEFRA which supports the need to improve water efficiency Plan for Water: our integrated plan for delivering clean and plentiful water - Plan for Water: our integrated plan for delivering clean and plentiful water - GOV.UK and the Government's Environmental Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new developments, including consideration of a new standard for new homes in England of 100 litres per person per day where there is a clear local need, such as in areas of serious water stress. It has recently been announced by Government that a review of the Water Efficiency Standard(s) within the Building Regulations 2010 (Part G2 of the Approved Documents) will be consulted on in the next few months.

As raised by the Environment Agency in the previous round of consultation on the Strategic Environmental Appraisal (Spring 2024) and for the above reasons, we respectfully request

this matter is re-visited. An improvement to the plan would be to include a target standard i.e. 100 litres per person per day. It is appropriate that the

neighbourhood plan includes details in its policies to help shape the design of development in the area by promoting water efficiency. This should include positive features of water efficient fixtures and fittings, and through rainwater/storm water harvesting and reuse, and greywater recycling. In addition, if water efficiency measures are promoted, this will help reduce the amount of foul drainage from developments and lessen any pressure on water recycling centres.

Separate comments are provided below on the corresponding design guidelines and codes document.

Surface Water Drainage

Anglian Water is 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.

We are aware that with more people opting for more paved and decked areas in their gardens we are seeing a loss of green areas, particularly in heavily populated areas, but it can also cause problems in less populated areas too. This means rainwater has nowhere to go, increasing the amount of water travelling into the sewer which can then cause flooding. We, therefore, advocate the use of natural drainage and sustainable drainage systems (SuDS) to minimise surface water run-off from existing properties and new development as part of the solution to protect the sewer network.

Such measures help to avoid surface water run-off from entering our foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development.

Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure.

The reference under Policy UFF15 criterion (g) requiring separate systems for surface water and foul water being provided is welcomed.

It has been the intention of Government to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in

England. However, we welcome the policy approach to ensure SuDS measures are incorporated within new developments, until such time these measures are in place.

Paras. 2.36 – 2.37 Rivers and Flooding (page 20) -We note the reference to localised flooding being made in the neighbourhood plan. If relevant in terms of sewer flooding, further information on reducing the risk of such events can be found on our website:

<https://www.anglianwater.co.uk/help-and-advice/flooding-guidance/reduce-the-risk-of-flooding/>

As part of our Get River Positive commitment, we have pledged to be as transparent as possible with the data we collect about our water recycling network and the improvements that we are making, especially around storm overflows. We have provided an online map that shows our latest investment schemes to improve the environment, including 2021 storm overflow data and the river network. Information can be found on our website:

<https://www.anglianwater.co.uk/services/sewers-and-drains/storm-overflows/improving-rivers-and-coastlines>

Policy UFF5: Local Green Spaces

The policy designates a number of areas of Local Green Spaces (LGS) within the neighbourhood plan area and is clear that managing development within a LGS should be consistent with national policy for Green Belts, as set out in paragraphs 104 – 107 of the NPPF (current 2023 version).

Anglian Water does have assets forming part of our water and water recycling network (e.g., rising mains and sewers) located in or in the vicinity of these designated areas of local green space. For example, there are underground pipes (sewers, water supply) which are located within sites 2, 4, 8, 9, 13 and 14. Based on the proposed wording of Policy UFF5, we do not consider that the policy would prevent any operational development that may be needed to manage, maintain or repair our assets.

Maps of Anglian Water's assets detailing the location of our water and water recycling infrastructure (including both underground assets and aboveground assets such as pumping stations, water treatment and water works and water recycling centres) are available at: www.utilities.digdat.co.uk

Policy UFF6: Landscape Character and The Water Meadows

Policy UFF8: Biodiversity/nature conservation

Policy UFF9: Ecological corridors

Anglian Water supports these policies in prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing and new areas of green and blue infrastructure. We would also support opportunities to maximise green infrastructure connectivity including through opportunities to minimise surface water run-off from existing urban areas through the creation of rain gardens for example.

Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all AW-owned land.

There may be benefit in referencing the emerging Suffolk Local Nature Recovery Strategy (Local Nature Recovery Strategy (LNRS) - Suffolk County Council) which will identify priority actions for nature and map specific areas for improving habitats for nature recovery.

Policy UFF9 identifies a corridor of habitats to be protected and enhanced as shown in Figure 27. These areas include Anglian Water owned assets which are critically important water supply and wastewater infrastructure, such as water supply and sewer pipes underground.

In addition, at land south of Spring Lane there is a sewer pumping station. Due to the scale of the map provided it is not possible to ascertain the extent of the proposed corridor around the facility. We ask the neighbourhood plan group to clarify the position on this matter with us. This could potentially place an unnecessary policy burden which could limit our ability to bring forward planned investment/ engineering works needed to serve the local community. Some of these works may be necessary operational works and deemed as 'permitted development'. To ensure that we can undertake any necessary works/ enhancement of this asset, we object to its inclusion and request that this area is removed from the proposed designation.

I should be grateful if you could please contact me directly to discuss as the Anglian Water lead for neighbourhood plans. My contact details are provided in this response.

Design Guidelines and Codes

Section 2.4 (pages 25- 26)

The diagram on p. 26 illustrates different measures for low-carbon homes for both existing and new homes, including water efficiencies. This can be achieved by a fixtures and fittings approach, including through rainwater/ storm water, harvesting and reuse,

and greywater recycling. Under point 6 this should state "*highly water-efficient devices*" rather than "*highly waste-efficient devices*". An updated version should be sought from AECOM as this anomaly in the diagram has been corrected for other neighbourhood plans.

Section 4.1 Checklist (pages 57 – 63)

Whilst guidance/ codes in the preceding sections includes mention of water efficiency, this is not adequately covered in the checklist. It is recommended this is added for greater effect under Checklists 1 and 8.

Permeable surfacing for parking and other hard standing areas is not referred to and should be listed under checklist 10.

I should be grateful if you could please acknowledge receipt of this representation and keep me updated on further progress made on the neighbourhood plan.

Landex Ltd

Landex continues to support the allocation of this land for the residential development prescribed within the policy UFF16 subject to being able to produce a viable, well designed development. The company intends to adopt the approach to the planning of its development scheme in accordance with the recently adopted East Suffolk developers charter.

We confirm that the land shown within the proposed allocation, is available and is capable of delivering the allocation albeit that there will be a need for flexibility in the detailed design of the submitted scheme and its constituent elements together with a pragmatic, common sense approach and understanding to the delivery of the associated, proposed public areas. The company intends to continue its ongoing work with the Parish Council and the Neighbourhood Plan delivery team.

Sport England

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) and Localism Act 2011

Sport England Reference: SP/24/00005952

Thank you for consulting Sport England on the above neighbourhood plan.

INTRODUCTORY COMMENTS

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that **Sport England is a statutory consultee on planning applications affecting playing fields.**

Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Planning for Sport Guidance ('Guidance').

The overall thrust of the Guidance is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT the right opportunities in the right places

ENHANCE opportunities through better use of existing provision

PROVIDE new opportunities to meet the needs of current and future generations.

Sport England's aim in working with the planning system is to help provide active environments that maximise opportunities for sport and physical activity for all, enabling the already active to be more so and the inactive to become active. The importance of sport should be recognised as a key component of local plans, and not considered in isolation.

The following comments are provided within the context of:

- The National Planning Policy Framework (DCLG, 2023).
- Sport England's Planning for Sport webpages including Planning for Sport Guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport>

COMMENTS ON THE NEIGHBOURHOOD PLAN

Upon reviewing the draft neighbourhood plan, Sport England acknowledges that their feedback concerning the neighbourhood plan, as detailed in our response dated 13th March 2024, has been adequately addressed, which is welcomed.

Sport England General Comments

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document - https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local

authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

- NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>
- PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>
- Sport England's Active Design: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

East Suffolk Council

Ufford Neighbourhood Plan – Regulation 16 Consultation Response

The preparation of the neighbourhood development plan for Ufford (the UNP) is supported, and it is considered that, overall, it is a well-presented plan that complements the strategy and policies contained in the Suffolk Coastal Local Plan (2020).

The Council has had good liaison with the Neighbourhood Plan group and submitted 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 but some have not. Whilst the Council does not have any 'basic conditions' objections to the submission UNP, there are a number of comments on the Submission Neighbourhood Plan, which are set out below:

Section/Policy	Comments
General Comments	<p>Various policies could be shortened, to aid clarity and reduce duplication; this is perhaps most notable in UFF1, where the Design Guidelines and Codes presents an opportunity to significantly shorten and use cross-referencing within the policy.</p> <p>Some of the policies could be removed where they simply repeat, or largely repeat, policies of the Suffolk Coastal Local Plan (2020) without adding much local detail to justify their inclusion. Examples include UFF2: New housing, UFF4: Rural and community led exceptions sites, and UFF10: Historic environment. This has the effect of adding to the plan's overall length without adding value, reducing its usability.</p> <p>In terms of document navigation, it would be useful if the Plan's contents page could list and include hyperlinks to the start of each of the Plan's policies, not just the chapters. The recently made Wickham Market NP's contents page is an example of this.</p> <p>As a general point, references to NPPF paragraphs/extracts will need updating to reflect the December 2024 version.</p>
Introduction	<p>Paragraph 1.6 should read the 'Suffolk Coastal Local Plan'.</p> <p>Paragraph 1.9 should read the '<u>Town</u> and Country Planning Act 1990 (as amended)'.</p>

2. Ufford Parish	<p>Figure 7's (page 19) is unclear – it is suggested this is amended with what is presumably accessible ancient woodlands – the darker colour with stripes – being separately labelled in the key.</p> <p>In paragraph 2.32, a small part of Rowanwood Cottage Marsh County Wildlife Site (Suffolk Coastal 141) extends into the parish (north of the A12) from neighbouring Pettistree and lies within the parish boundary and for completeness could be added to this list.</p>
3. How the Plan was prepared	No comments.
4. Vision and objectives	Paragraph 4.2 – a small point is that Policy UFF8 (Biodiversity) is missing from Figure 20.
5. Policies and projects	<p>Figure 21 from the 'Projects' section (pages 37-38) potentially combines items for precept (or other funding) spend with CIL-funding eligible items, although it is believed that these items are largely what the Parish Council would anticipate spending its parish CIL share on. An example is the potential provision of a new/extended burial ground, which obviously partly relates to new growth but primarily (it is believed) due to existing need. It would be helpful if these two types of funding were clarified, should any future bids want to be made for district CIL monies. It is therefore suggested that two distinct lists be created – one for primarily CIL spending, and one for precept (or other funding) spending.</p> <p>For the projects intended to be funded through CIL, particularly where a bid for district CIL to support its delivery may be anticipated, the current structure of ranking priority by number is recommended to be combined with, or replaced by, a priority structure of 'critical', 'essential' and 'desirable'. If numbers are to be retained, however, the Parish spending priority list should be corrected as the joint '4s' are currently listed as '7s'.</p> <p>Regarding the specific project of finding a new burial ground (also covered in paragraph 9.4 and policy UFF14, Community Facilities), it is recommended that the text includes further information on the need for a new burial ground, the assessment criteria that the Parish Council have/will use, whether any sites have been considered and discounted already and why, and where the Parish would consider it acceptable for the burial ground to be located, and when would it be needed by (i.e. must one be delivered within the next 15 years based on current growth rates?).</p>

	<p>This section would also benefit from more detail about the projects listed in Figure 21, i.e. how were the costing figures arrived at, how they will be funded, how the priority list was ordered and why, etc.</p> <p>Other than that, ESC supports the Plan listing the project priorities under Figure 21. This enables the Council to share those priorities and help Ufford to achieve them in a collaborative fashion – through either forward funding of Neighbourhood CIL where this is possible or, through collaborative funding through Local CIL Funds or the larger District CIL Fund.</p> <p>UFF14 Community Facilities does not currently have a priority ranked system – it is suggested that this policy makes reference to/includes an internal hyperlink to the CIL-funded priority list.</p> <p>Para 5.6 says “The CIL is levied on practically all new development within a given area” but this is not quite correct – it is levied on most residential development, except affordable housing and self-build dwellings.</p>
<p>6. Housing and design – Policy UFF1 Design</p>	<p>The criteria list for UFF1 Design is long, which may make it more difficult for schemes to be designed in accordance with the policy as a whole and might undermine interpretation of its key messages.</p> <p>There is also no major need to have a long design policy as the submission UNP is supported by a Design Guidelines and Codes document; a significant amount of the policy’s content could potentially be replaced with a cross-reference to the relevant part(s) of that document. However, this is not a basic conditions matter and is recommended only to improve the readability and interpretation of the policy.</p> <p>If the content of the policy is largely retained as is, the following amendments are recommended:</p> <ul style="list-style-type: none"> • Footnote 4 should read ‘principal elevation’ (not ‘principle’). • Suggest criterion (f) is replaced with a cross reference to section 2.2 (code 19) of the design code. It is also noted that there is a potential wording conflict here in the respect of how fences and walls should

	<p>be used to divide public and private spaces.</p> <ul style="list-style-type: none"> • Regarding the orientation of homes' principal elevations towards public spaces, as stated previously, there may be reasons why this may need to be adjusted (balancing solar gain/shade, privacy, adjoining active travel routes needing natural surveillance as well, etc.). There may be a risk of noise disturbance from use of public open spaces, particularly children's play areas, that justifies a buffer area that would set homes back from the space but allow them to face onto the space without unacceptable risk of disturbance. The matter of ensuring adequate buffer zones from play areas so that homes can face onto them could be included in the policy wording, or a cross-reference made to the Council's Healthy Environments SPD (which has detailed information on this matter). • The parking section could be reduced to criteria (i) and (l) only, with the cut sections replaced with a reference to the relevant sections of the design code instead (e.g. criterion (m) could be replaced with a cross-reference, where there is fuller guidance on garages). • Regarding criterion (o), it is not a realistic requirement for 'all new developments' to have street trees because some developments will be too small to include new street trees, or sites could already have good tree cover and there may be insufficient room for more. The wording therefore needs to be reworked to be more flexible, such as requiring new trees (not just street trees) 'where feasible'. Regarding the reference to trees within play areas, the Council is unlikely to support trees <u>inside</u> equipped play areas (e.g. LEAPs) due to safety and maintenance concerns (e.g. leaf drop from contributing to the buildup of algae) though trees can be planted nearby (but not overhanging). <p>Lastly, Policy UFF15 New and Existing Business makes reference to proposals that enable homeworking, which would be better covered under UFF1's policy criteria if what is meant by this is desk-based home working; otherwise it might be better for this policy to make reference to 'live/work units' which indicates the provision of appropriate spaces for commercial activities, for example, incorporation of space for an integral creative studio space on the unit's ground floor.</p>
--	---

<p>6. Housing and design – Policy UFF2 New housing</p>	<p>This policy is considered to be largely unnecessary, and could therefore be removed to shorten the UNP as little of it is substantially different to the Suffolk Coastal Local Plan:</p> <p>The first paragraph is covered by Policy SCLP3.2: Settlement Hierarchy and Policy SCLP3.3: Settlement Boundaries.</p> <p>The second and third paragraph is covered by Policy SCLP5.2: Housing Development in Small Villages and Policy SCLP5.7: Infill and Garden Development.</p> <p>The fourth paragraph is not needed, as it only directs the reader to national and local policies.</p> <p>The fifth paragraph adds some value by referencing the separate built-up areas of Ufford. However, this matter is also covered by Policy SCLP3.3 of the Local Plan which supports the principle of development coming forward anywhere within that envelope area. In practice, it is likely that a combination of the water meadows floodplains and the suite of Local Green Space designations proposed (if the sites in this area are retained for the made plan) would effectively perform the function of retaining these gaps.</p> <p>If this policy is retained, the supporting text for this policy could also include a reference to the Settlement Sensitivity Assessment (2018), which stated that the gap between Ufford and Melton should be maintained.</p>
<p>6. Housing and design – Policy UFF3 Housing Mix</p>	<p>This policy is supported in principle, including the affordable tenure mix, which is largely consistent with Policy SCLP5.10: Affordable Housing on Residential Developments.</p> <p>Policy SCLP5.10: Affordable Housing on Residential Developments does not set a maximum discount level for affordable home ownership tenure homes. The proposed 50% discount in UFF3 on First Homes is high, although it is within acceptable range as per the Affordable Housing PPG. Whilst not a basic conditions concern, it is noted that it could have an impact on development viability that may play out at the planning</p>

	<p>application stage for some schemes.</p> <p>The Council has no concerns about the inclusion of the sentence “where affordable housing is to be provided, priority should be given to those who can prove a local connection to Ufford parish”; however, it should be noted that the Council’s Affordable Housing SPD states that a local connection cascade should be a standard part of any S106 (see Appendix 2 Section 106 Model Heads of Terms and Template Clauses).</p>
6. Housing and design – Policy UFF4 Rural and Community Led Exceptions Sites	<p>This policy could be shorter, or perhaps simply removed, as these matters are addressed through:</p> <ul style="list-style-type: none"> • Policy SCLP5.11: Affordable Housing on Exception Sites, • UFF1: Design, and • UFF2: New housing (the paragraph on coalescence). <p>The footnote on what is meant by ‘small-scale’ (5-10 dwellings) could perhaps be changed to ‘non-major development’, as per the NPPF definition, as it is possible (although acknowledged to be unlikely) that schemes of 1-4 could come forward.</p> <p>Regarding criterion (c), a small amendment to say “the housing remains in affordable tenure and available in perpetuity” is recommended.</p> <p>Regarding criterion (h), it does not seem justified to rule out using some otherwise suitable land for delivering affordable homes because it would, for example, make use of only part of a field. Landscaping measures could be proposed which would introduce new boundaries and therefore an amendment is proposed: “...<i>well defined on the ground or such boundaries could be introduced through new landscape planting.</i>”</p>
7. Environment – Policy UFF5 Local Green Spaces	<p>The Council has no objections to the proposed Local Green Spaces (LGS), given the reduction in number and extent from the Regulation 14 consultation.</p>
7. Environment – Policy UFF6: Landscape	<p>The Council appreciates the recognition of these areas which are likely to provide higher biodiversity value and be more sensitive to development.</p>

Character and The Water Meadows	
7. Environment – Policy UFF7 Important Views	The proposed important views appear to be appropriate and justified.
7. Environment – Policy UFF8 Biodiversity	<p>Para 7.21 has not been updated to include the additional County Wildlife Site that was suggested by ESC (Rowanwood Cottage Marsh CWS, site 141).</p> <p>Para 7.22: add to the Deben Estuary SSSI that is also a Special Protection Area and a Ramsar site.</p> <p>Para 7.28 Page 75 – for completeness a minor amendment to say ‘great crested newt’ is sought (not simply ‘crested newt’, as the species of concern is the great crested newt).</p> <p>UFF1 makes reference to climate-resilient plantings. It may be useful to also make reference to climate-resilient plantings in this policy, noting the importance of balancing relevant species for creating a net gain in biodiversity with ensuring the plantings are durable in changing conditions, and are less likely to die off and need replacing.</p>
7. Environment – Policy UFF9 Ecological Corridors	The Council welcome the acknowledgement of the importance of ecological corridors and the need to retain, protect, and enhance them within the parish.
7. Environment – Policy UFF10 Historic Environment	Regarding the paragraph in italics that immediately follows UFF10, the correct title is ‘Suffolk Coastal Local Plan’, not ‘East Suffolk Local Plan’.
7. Environment – Policy UFF11 Non-designated Heritage Assets	The proposed NDHAs appear to be appropriate and justified.
7. Environment – Policy UFF12 Dark Skies	In terms of impacts on wildlife, the BCT guidance note ‘08/23 Bats And Artificial Lighting At Night’ could be referenced here for more specific nature-based sensitive lighting recommendations.

<p>8. Accessibility – Policy UFF13 Access and Connections</p>	<p>The Council would like to see a cross-reference to the Healthy Environments SPD's guidance on active travel infrastructure – particularly in terms of ensuring accessibility and inclusivity, and the creation of 'green routes', which is described currently in this policy as a 'green corridor', which is essentially synonymous, though it may be beneficial to keep the language consistent with the SPD.</p>
<p>9. Community – Policy UFF14 Community Facilities</p>	<p>The first two paragraphs of the policy appear to largely duplicate Policy SCLP8.1 of the Suffolk Coastal Local Plan but the Council does not have any major concerns about this.</p> <p>Due to the small scale of growth that is anticipated in Ufford over the plan period to 2036, it is unlikely that the desired facilities will be delivered via private development. It is therefore likely that the primary mechanism for delivering the identified new community facilities listed in UFF14 will be through Neighbourhood CIL spend (or other community sourced funding). As noted earlier in the Council's response, it will therefore be useful if the Plan includes a clear list of the community facilities desired and needed to mitigate the impacts of growth, ranked by priority.</p> <p>It would therefore be useful if the community facilities that are listed in Policy UFF14 were given a priority ranking that is consistent with the format of SCLP's Infrastructure List, i.e. 'Essential', 'Critical' or 'Desirable'. This could be used in combination with numbers to show nuance within these three categories. It is acknowledged that this is not a requirement; however, having the list embedded into the UNP would make it more convenient for the Council to have reference to it if/when bids for District CIL funding are received.</p>
<p>10. Business and Employment – Policy UFF15 New and Existing Business</p>	<p>It is suggested that the point about home working is moved to UFF1: Design, which determines residential design.</p>

<p>11. Area specific policy – Policy UFF16 Former Crown Nursery Site</p>	<p>Criterion (a) should simply state that a third of the housing should be Affordable Housing, consistent with the requirement in Policy SCLP5.10 – the figure of ‘8’ is overly prescriptive when the number of dwellings set out in the policy is 20-25 dwellings.</p> <p>The sections about the non-allocated Notcutts site (paras 11.14-11.17) perhaps do not need to be included here – it could be summarised more briefly, as the more detailed analysis and rationale is included in Appendix E.</p> <p>Figure 31 on page 89 (which shows an indicative route between Goldsmiths and the Community Hall, via the former Crown Nurseries site) would appear to be a more natural inclusion in this chapter of the UNP, perhaps even included within Figure 33.</p> <p>The Council would like to see the rationale for why the figure of “approximate” eight allotments is included in the policy explained briefly, along with an indication of who would be expected to manage the allotments, plus likely eligibility criteria. It is assumed that this need is for the parish of Ufford generally, not just the site itself, but it would be useful for this to be confirmed, if true.</p> <p>Regarding criterion f) (tree and hedge survey requirement), as surveys of trees are mentioned here, it is also requested that an Ecological Impact Assessment (EclA) is highlighted as a requirement either in the policy or the supporting text. The EclA should be undertaken by a suitably qualified ecologist following published best practice guidance and include all the necessary ecological assessments, should identify appropriate ecological avoidance, mitigation, compensation and enhancement measures to be included as part of the development.</p> <p>Paragraph 11.26 states that land <i>“outside of the allocated site, including the former orchard, would be conveyed to the Parish Council...”</i>. However, Figure 33 and UFF16 show that the 5.0 ha Crown Nursery allocation contains the former orchard and the woodland areas within the red line area, which is very sensible. Some minor wording changes are therefore recommended to paragraph 11.26 to minimise any potential for confusion</p>
--	--

	– it appears to the Council that this has arisen due to describing the 2.8 ha residential element of the site slightly separately from the other 2.2 ha (allotments, orchard and woodlands).
12. Implementation	No comments.
Appendix A Steering Group	No comments.
Appendix B Justification for Local Green Spaces	No comments.
Appendix C Justification for NDHAs	No comments.
Appendix D Glossary	No comments.
Appendix E Site Assessment	No comments.
Ufford Design Guidelines and Codes	The front cover reads 'June 2023', though this document was updated in October 2024.

Environment Agency

Thank you for consulting us on the Pre Submission Consultation for the Ufford Neighbourhood Plan.

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:

Groundwater and Contaminated Land Cemetery Provision

The requirement for cemetery space/burial grounds has been identified in the plan.

We recommend the following guidance be referenced: Guidance for Cemeteries and burials; Protecting groundwater from human burials; and The Environment Agency's Approach to Groundwater Protection, section L. Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted. Site Allocation: Former Crown Nursery Site

We are pleased to acknowledge support for the development of brownfield sites in Policy UFF15 and in the site-specific Policy UFF16. This is in line with NPPF Paragraphs 122, 146, 180, 189 and 190 within the National Planning Policy Framework (NPPF). Any development proposed should follow the requirements of our Land Contamination Risk Management (LCRM) guidance. This would initially require Preliminary Risk Assessment, which would consider any potential pollutant linkages. Consideration for the risk posed by surface water

drainage and foundations will need to be undertaken. Sustainable Urban Drainage Systems (SuDS)

A requirement to use Sustainable Urban Drainage Systems (SuDS), where appropriate, is included within the Plan Policy UFF1 and UFF8, as well as site-specific UFF16. We support the use of SuDS schemes where appropriate to support aquifer recharge and reduce flooding. However, use of infiltration SuDS is not appropriate on all sites. They should not be constructed in contaminated ground and should not be used where infiltration can re-mobilise contaminants already within soils to pollute groundwater. Where peak seasonal groundwater levels are shallow this may constrain the potential for infiltration drainage or the choice of infiltration SuDS due to a requirement to maintain a minimum unsaturated zone thickness beneath the infiltration level. We discourage the use of Deep Infiltration Systems (greater than 2m deep) such as borehole soakaways due to their inherent pollution risk.

We recommend that the following guidance be referenced: The Environment Agency's Approach to Groundwater Protection, particularly statements G1 and G9 to G13; The CIRIA C753 SUDS Manual; The Susdrain website; The Sustainable Drainage Systems: Non-Statutory Technical Standards guidance on gov.uk and the Recommendations To Update these.

Aquifers

The plan provides local context regarding the environment but does not note the importance of the underlying aquifer. The Environment Objective should be amended to include reference to groundwater and protecting controlled waters. Ufford is underlain by Principal and Secondary aquifers: Principal aquifers support water supply and sustain base flow to rivers on a strategic scale, whilst Secondary A aquifers can support local water supply and may also provide an important source of base flow to rivers.

The aquifer supports groundwater abstractions for public water supply. Source Protection Zones (SPZs) surround these abstractions and extend across Ufford. The

SPZs show the level of risk to the protected source from contamination and contaminative activities and are used to guide decisions about the acceptability of potentially polluting development scenarios. The aquifers that underly the area also support abstractions for agriculture. The groundwater resource is therefore of high value.

We recommend that the following guidance be referenced: The Groundwater Protection guidance on gov.uk which includes the Protect Groundwater and Prevent Groundwater Pollution guidance and The Environment Agency's Approach to Groundwater Protection. Our guidance is regularly revised, and therefore, throughout the plan's duration, the most recent version or replacement guidance for superseded versions should be consulted.

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 along the Byng Brook and ancillary water courses.

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 167 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).

Source Protection Zones

Your plan includes areas which are located on Source Protection Zone 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>

Biodiversity Net Gain

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. Identifying sites for the delivery of Biodiversity Net Gain could lead to habitat improvements in your area. Biodiversity Net Gain is a system that delivers habitat improvements on any local sites including Local Wildlife Sites to ensure that there is no loss of habitats from new development. Identifying areas that could benefit from management for conservation within your area could enable habitat to be created closer to development sites in your plan area, providing local ecological enhancement.

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](#).

Thank you for consulting us on the Pre Submission Consultation for the Ufford Neighbourhood Plan.

Christopher Goodall

Appendix B

Page 115

No 6

The small grassy area at the top of Church Lane.

As a resident of [REDACTED] Lower Ufford I'm intrigued to know and question why the ambiguity surrounding and I quote the small grassy area at the top of Church Lane.

To clarify and forestall any future appeal would you define precisely the area in question, the status of the area, ownership of the area and size of the area in square meters.

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/>

National Highways

National Highways welcomes the opportunity to comment on the consultation of the Ufford Neighbourhood Plan – Regulation 16 Submission Draft Consultation which covers the plan period from 2022 to 2036.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to the Ufford Neighbourhood Plan, our principal interest is in safeguarding the operation of the A14.

We understand that a Neighbourhood Plan is required to be in conformity with the relevant national, regional, and local planning policies. Accordingly, the Neighbourhood Plan is required to be in general conformity with the strategic planning policies of the development plan which complement those in the East Suffolk Council - Suffolk Coastal Local Plan (adopted on 23 September 2020). This draft Neighbourhood Plan covers the period to 2036 to coincide with the end year of the adopted Local Plan.

The adopted Local Plan made no specific new allocations in the Ufford Neighbourhood Plan area. Page 2 of 2

National Highways therefore consider the limited level of growth proposed across the Ufford Neighbourhood Plan area, will not have a significant impact on the operation of the SRN.

We have no further comments to provide and trust the above is useful in the progression of the Neighbourhood Plan.

Natural England

Thank you for your consultation on the above dated 20 November 2024.

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 the consultation under regulation 16 of the Ufford Neighborhood Plan.

Suffolk County Council

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

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

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~~.

Mineral and Waste

SCC notes that the Suffolk Minerals and Waste Local Plan (2020) is briefly referred to in paragraph 1.6, which is welcomed.

However, SCC believes that the Suffolk Minerals and Waste Local Plan (2020) should also be included later in the plan, under the heading of “National and local planning policy context” from page 9 onwards. The Suffolk Minerals and Waste Local Plan (2020) is a policy document in the same way the district council’s Local Plan is a policy document, and all its policies need to be considered where applicable.

SCC would recommend that the Suffolk Minerals and Waste Local Plan (2020) is included after paragraph 1.24 following the information set out regarding the East Suffolk Local Plan

Strategy, which falls under the heading of “Local Policy framework for Ufford Neighbourhood Plan”.

Paragraph 13 of the NPPF 2024 indicates that Neighbourhood Plans should “*support the delivery of strategic policies contained in local plans or spatial development strategies*”. The Suffolk Minerals and Waste Local Plan (2020) is a strategic policy document and should be considered with the same weight as the adopted district council Local Plan.

Therefore, in order to be in conformity with Basic Condition A) and C), the following text should be added, as a new paragraph with its own subheading following paragraph 1.24:

‘Suffolk Mineral and Waste Local Plan 2020

1.25 Ufford is within a Minerals Consultation Area and Minerals Safeguarding Area as defined by Suffolk County Council as the Minerals Planning Authority. As such the County Council will need to be consulted on the planning application. Therefore, any planning application should be supported by evidence which assesses the quality and quantity of sand and gravel resources on site in order to help judge whether on-site resources should be used on-site during development. This may help reduce the amount of material transported on and off the site.

In this area, Suffolk Minerals and Waste Local Plan (2020) Policy MP10: Minerals Consultation and Safeguarding Areas will apply.’

As per Paragraph 005 of the NPPG (2024) (Reference ID: 27-005-20140306) local plan making authorities are required to have regard to the local mineral plan and to consult the minerals planning authority where sites fall within the Minerals Consultation Area

“What is the role of the district council, as the local planning authority, in safeguarding minerals?”

Whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in 3 ways:

- *having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps;*
- *in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and*

- *when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.*

Paragraph: 005 Reference ID: 27-005-20140306''

SCC is requesting to include the Suffolk Minerals and Waste Local Plan (2020) and it's relevant policies in the Ufford Neighbourhood Plan not because SCC wishes for the plan to access the policies, it is so readers of the plan are aware of policies in Suffolk Minerals and Waste Local Plan (2020) which affect the neighbourhood plan area. For example, Policy MP10: Safeguarding will stipulate the applications for development in excess of 5 hectares (regardless of whether it is a mineral application or not) will need to consult with SCC as the Local Minerals Authority so our input can be given in mitigating any effects of any development relevant to this plan area.

Natural Environment

As part of SCC's Regulation 14 consultation response, it was raised that location maps for the Local Green Spaces would be a useful addition to the Appendix. As part of the Consultation Statement, the parish council has agreed to include them, however it appears that these additional maps have not made their way into the Regulation 16 consultation version of the plan. Whilst this is not necessarily a soundness issue, it would be helpful to have these additional maps included within the appendix as indicated.

General Formatting

SCC notes that paragraph 7.11 has extra empty bullet point. This does not impact the soundness of this plan but is for the parish council to be aware of.

Suffolk Wildlife Trust

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

Environment Objective

Suffolk Wildlife Trust support this overriding objective within the plan.

Policy UFF8: Biodiversity

Suffolk Wildlife Trust are happy to see our previous comments and that there is support in principle for the plan to have a 20% net gain ambition. As this is not included as a policy requirement, or an open ambition, we see no reason why this invitation for development to go beyond the statutory minimum requirement in Ufford, delivering a greater contribution towards nature recovery, should not be retained within the plan.

We do however note that there are four County Wildlife Sites in Ufford, *Ufford Grove*, *Boon Meadow*, *Round Grove*, and *Hospital Grove*. The latter of which is not included within the list noted within the draft plan. *Hospital Grove* is accessed via Thomas Churchyard Close, in the neighbouring parish of Melton.

Suffolk Wildlife Trust raise no further comment and offer our support to Policy UFF8.

UFF9: Ecological corridors

Suffolk Wildlife Trust raise no issue with this policy, which is well worded. We support the principle aim of this policy and the wording provided.