

Ufford Neighbourhood Plan Basic Conditions Statement

To accompany the Ufford Neighbourhood Plan
submission version, for examination

October 2024

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1 Introduction

- 1.1 When submitting a Neighbourhood Plan to the Local Authority (in this case East Suffolk Council), it is a requirement that the Neighbourhood Plan be accompanied by a number of supporting documents. One of these is commonly referred to as the 'Basic Conditions Statement'. Only a Neighbourhood Plan which meets each of the basic conditions can be put to referendum and if successful, be used to assist in the determination of planning applications.
- 1.2 This Basic Conditions Statement is prepared for use by East Suffolk Council and the Independent Planning Examiner, to assist in making this assessment about the basic conditions.

2 Legal requirements

Legal Requirements: The Ufford Neighbourhood Plan is compliant with The Planning and Compulsory Purchase Act 2004 38A (1) & (2) and 38B (a)-(c) (as amended).

Qualifying Body: The Ufford Neighbourhood Development Plan is being submitted by a qualifying body – Ufford Parish Council. Ufford Parish Council was confirmed as a qualifying body by East Suffolk Council on 22nd April 2022, when the Ufford Neighbourhood Plan Area was designated.

A Neighbourhood Development Plan: The Ufford Neighbourhood Development Plan is a neighbourhood development plan. It relates to planning matters (the use and development of land) and has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.

The time period covered: The Ufford Neighbourhood Development Plan states the time-period for which it is to have effect (from 2022-2036) a period of 14 years.

Excluded Development: The Ufford Neighbourhood Development Plan policies do not relate to excluded development. The Ufford Neighbourhood Development Plan does not deal with County Matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

Area of the Neighbourhood Plan: The Ufford Neighbourhood Development Plan relates to the Ufford Parish Council's Neighbourhood Area and to no

other area. There are no other Neighbourhood Plans in place relating to that Neighbourhood Area.

3 Basic Conditions

3.1 Paragraph 8(2) of Schedule 4B in the Town and Country Planning Act 1990 (as amended by Schedule 10 of the Localism Act 2011 and paragraph 102 (1) of the Levelling Up and Regeneration Act 2023) sets out a series of requirements that Neighbourhood Plans must meet. These 'basic conditions' are set out below:

3.2 A draft Plan meets the basic conditions if:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan (see Section 4 below).
- (b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order (applies in relation to a Listed Building only) insofar as the order grants planning permission for development that affects the building or its setting (not applicable in respect of the Ufford Neighbourhood Plan).
- (c) Having special regard to the desirability of preserving or enhancing the character or appearance of the Conservation Area it is appropriate to make the order (applies in relation to Conservation Areas only) insofar as the order grants planning permission for development in relation to buildings or land in the area (not applicable in respect of Ufford Neighbourhood Development Plan).
- (d) The making of the Plan contributes to the achievement of sustainable development (see Section 5 below).
- (e) The making of the 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). (see Section 4 below).

Note: The Levelling up and Regeneration Act 2023, introduces a replacement Basic Condition to replace (e) above as follows, which is yet to be formally enacted but nevertheless has been considered by this statement:

e) (a) the making of the order/Plan would not have the effect of preventing development from taking place which

- (i) is proposed in the development plan for the area of the authority (or any part of that area), and*
- (ii) if it took place, would provide housing*

(f) The making of the Plan does not breach and is otherwise compatible with EU obligations (see Section 6 below) and,

(g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with, in connection with the proposal for the plan (see Section 7 below).

3.3 Where applicable each of these basic conditions is addressed in the following sections. For clarification it should be noted that b) and c) above are not applicable to the Ufford Neighbourhood Development Plan and refer to 'Neighbourhood Orders' only.

4 Compliance with Basic Conditions (a) and (e)

4.1 The following tables provide an appraisal of the extent to which the Ufford Neighbourhood Plan has regard to national policy and is in general conformity with strategic local policy.

4.2 The Neighbourhood Plan policies were drafted to be in conformity with the National Planning Policy Framework published in December 2023. **Table A** below assesses the degree of regard that the Ufford Neighbourhood Development Plan policies have had to NPPF 2023 (**Column B**).

4.3 The strategic policies for the area are contained in the East Suffolk Council – Suffolk Coastal Local Plan (SCLP) which was adopted in September 2020 and has a plan period up to 2036. The Neighbourhood Plan has been assessed against the relevant policies in the Local Plan (**Column C**). A formal review of the Adopted Local Plan has not yet begun.

4.6 In summary, it is the view of the Ufford Parish Council (as the relevant Qualifying Body) that the appraisal demonstrates that the Ufford Neighbourhood Development Plan has had appropriate regard to, and is in general conformity with, both national and strategic policy.

Adopted Policy Documents – Table A

<p>Column A The Ufford Neighbourhood Development Plan Policy</p>	<p>Column B NPPF 2023</p>	<p>Column C East Suffolk Council – Suffolk Coastal Local Plan</p>
<p>UFF1:Design</p>	<p>This policy reflects NPPF Section 12 which indicates that the creation of high quality, beautiful and sustainable buildings and places is fundamental to planning.</p> <p>Policy UFF1 is supported by a specific design code for Ufford which is consistent with the emphasis in NPPF paragraphs 132 and 133. The policy seeks to ensure that all new development should reflect the parish's local distinctiveness and character and seek to enhance its quality.</p> <p>The Ufford Design Guidelines and Codes which supports the policy contains clear guidance on a range of design elements which are reflected in the policy.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP11.1 Design Quality which supports locally distinctive and high-quality design that clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means.</p> <p>Policy UFF1 requires that all new development reflects the local characteristics and circumstances in the Neighbourhood Plan area and creates and contributes to a high quality, safe and sustainable environment.</p> <p>The policy is supported by the Ufford Design Guidelines and Codes produced by AECOM.</p>
<p>UFF2:New housing</p>	<p>This policy is consistent with NPPF paragraph 29 which advises that Neighbourhood Plans should not promote less development than</p>	<p>This policy is consistent with Policy SCLP3.3 of the Adopted Local Plan by ensuring new development will be focused within the</p>

<p>Column A The Ufford Neighbourhood Development Plan Policy</p>	<p>Column B NPPF 2023</p>	<p>Column C East Suffolk Council – Suffolk Coastal Local Plan</p>
	<p>set out in the strategic policies for the area or undermine them.</p> <p>Policy UFF2 acknowledges that development will continue to take place in Ufford and that over the plan period this will comprise the allocation identified in the Neighbourhood Plan together with some infill/windfall development inside the settlement boundary. and some limited development outside of the Any development outside of the settlement boundary will need to be compliant with specific national and local policies regarding exceptions.</p> <p>The plan achieves the local housing requirement for Ufford as set out in the Adopted Local Plan of 44 and also the newly identified indicative housing requirement of 7.</p>	<p>settlement boundary and will only be allowed outside that area where particular circumstances set out in the NPPF or the Local Plan are met.</p> <p>The adopted Local Plan (2020) makes provision for a minimum of 44 new homes in the parish between 1 April 2018 and March 2036. All 44 were committed developments on the adoption of the Local Plan and a number have now been completed. The policy allows for additional 'windfall' development during the Neighbourhood Plan period.</p> <p>In addition a specific housing allocation is made under Policy UFF16.</p>

Column A The Ufford Neighbourhood Development Plan Policy	Column B NPPF 2023	Column C East Suffolk Council – Suffolk Coastal Local Plan
UFF3: Housing Mix	<p>This policy reflects NPPF para 63, which advises that planning policies should reflect the needs of “those who require affordable housing, families with children, older people (including those who require retirement housing, housing with care and care homes) students, people with disabilities, service families, travellers, people ,who rent their homes and people wishing to commission or build their own homes”.</p> <p>The policy is based on consultation, carried out with local residents and the Housing Needs Assessment carried out by AECOM. The policy specifically seeks to prioritise smaller dwellings whilst recognising that some larger dwellings may be required to maintain a balance of housing available in the parish.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP5.8 Housing Mix which set out the preferred housing mix for the district as a whole This includes a focus on smaller properties (1-2 bedrooms), accessible housing and housing for older people.</p> <p>Policy UFF2 provides support for smaller properties such as 2-3 bedrooms which would be suitable for families and older people</p>
UFF4: Rural and community-led exception sites	This policy is consistent with paragraph 73 and 82 of the NPPF which encourages community led housing developments and rural exceptions sites, promoting responsiveness to local circumstances and to support housing	This policy is in general conformity with Adopted Local Plan Policy SCLP5.11: Affordable Housing on Exception Sites which supports proposals for the development of

Column A The Ufford Neighbourhood Development Plan Policy	Column B NPPF 2023	Column C East Suffolk Council – Suffolk Coastal Local Plan
	<p>that reflects local needs including supporting opportunities to bring forward rural exceptions sites which will provide affordable housing to meet local needs.</p> <p>Policy UFF4 expresses support for small scale affordable housing schemes outside of the settlement boundary.</p>	<p>affordable housing in the countryside subject to criteria.</p> <p>Policy UFF4 adds local detail to the policy through additional criteria.</p>
UFF5: Local Green Spaces	<p>This policy reflects NPPF paras 105-107 which advocate “The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them”.</p> <p>The 14 spaces proposed for protection by Policy UFF5 have been assessed against the criteria in the NPPF paragraph 106.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP8.2 Open Space which seeks to safeguard existing open space and enables Neighbourhood Plans to identify Local Green Spaces.</p> <p>Policy UFF5 identifies 14 proposed Local Green Spaces which have been assessed against the criteria in the NPPF</p>
UFF6: Landscape character and The Water Meadows	<p>This policy reflects NPPF paragraph 180 b) which recognises the intrinsic character and beauty of the countryside.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP10.4 Landscape Character which seeks to ensure that development proposals are informed by landscape character assessments</p>

Column A The Ufford Neighbourhood Development Plan Policy	Column B NPPF 2023	Column C East Suffolk Council – Suffolk Coastal Local Plan
	The policy adds a local dimension to this by identifying the special character of The Water Meadows and the contribution they make to the landscape setting of Ufford.	Policy UFF6 adds a local dimension this by identifying the special character of The Water Meadows and the contribution they make to the landscape setting of Ufford.
UFF7: Important Views	<p>This policy reflects NPPF paragraph 180 b) which recognises the intrinsic character and beauty of the countryside.</p> <p>The policy identifies 15 important public views that it is considered should be protected from development that would have an adverse impact upon the identified view. Justification for the identified views is included in the supporting text to the policy.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP10.4 Landscape Character which seeks to ensure that development proposals are shaped by the landscape character.</p> <p>Policy UFF7 adds a local dimension and seeks to ensure that wherever possible that there is no detrimental impact on the 15 identified important public views.</p>
UFF8: Biodiversity/nature conservation	This policy is consistent with paragraph 180 (d) of the NPPF which requires planning policies to minimise impacts on and provide net gains for biodiversity. In addition, paragraph 185 (b) of the NPPF refers to the pursuit of opportunities for measurable biodiversity net gains.	This policy is in general conformity with Adopted Local Plan Policy SCLP10.1 Biodiversity and Geodiversity which supports development that maintains, restores, or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity. The policy is also in conformity with Policy SCLP12.28

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	<p>Policy UFF8 provides support for biodiversity net gain in new developments in accordance including the creation of new habitats, the repair and connection of existing networks, together with encouragement for tree planting and for the inclusion of wildlife friendly measures in new developments.</p>	<p>criterion e) which seeks enhancements to networks of green infrastructure and h) which seeks to protect and enhance the natural environment.</p> <p>Policy UFF8 has been prepared in the context of the Environment Act 2021 and seeks to protect and enhance existing ecological networks and wildlife corridors and supports proposals that provide a net gain in biodiversity</p>
UFF9: Ecological corridors	<p>This policy is consistent with paragraph 180 (d) of the NPPF which requires planning policies to minimise impacts on and provide net gains for biodiversity. In addition, paragraph 185 (b) of the NPPF refers to the pursuit of opportunities for measurable biodiversity net gains.</p> <p>Policy UFF9 provides an additional local dimension by identifying specific ecological corridors within the parish which can be enhanced for biodiversity.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP10.1 Biodiversity and Geodiversity which supports development that maintains, restores, or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity. The policy is also in conformity with Policy SCLP12.28 criterion e) which seeks enhancements to networks of green infrastructure and h) which seeks to protect and enhance the natural environment.</p>

Column A The Ufford Neighbourhood Development Plan Policy	Column B NPPF 2023	Column C East Suffolk Council – Suffolk Coastal Local Plan
		Policy UFF9 adds a local dimension to this by identifying the specific ecological corridors within Ufford.
UFF10: Historic Environment	<p>This policy reflects NPPF paragraphs 195 to 214 which seek to conserve and enhance the historic environment.</p> <p>Policy UFF10 covers designated heritage assets such as listed buildings and the Conservation Area. It outlines the approach to assessing the impact of applications on designated heritage assets.</p> <p>This policy is consistent with paragraph 197 which recognises the importance of Conservation Areas as having special architectural and historic interest.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP11.3 Historic Environment, SCLP11.4 Listed Buildings and SCLP11.5 Conservation Areas which seeks to ensure where possible that development makes a positive contribution to the historic environment.</p> <p>Policy UFF10 provides a more localised dimension and relates this general principle to the Listed Buildings and Conservation Area of Ufford where it provides some specific guidance for applications affecting heritage assets.</p>
UFF11: Non Designated Heritage Assets	This policy reflects NPPF paragraph 209 which outlines the approach to assessing the impact of applications on non-designated heritage assets. "In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be	This policy is in general conformity with Adopted Local Plan Policy SCLP11.6 Non-Designated Heritage Assets which sets out the criteria for dealing with applications that affect Non-Designated Heritage Assets.

Column A The Ufford Neighbourhood Development Plan Policy	Column B NPPF 2023	Column C East Suffolk Council – Suffolk Coastal Local Plan
	<p>required having regard to the scale of any harm or loss and the significance of the heritage asset."</p> <p>The policy identifies 15 Non-Designated Heritage Assets within the parish that are important to the local character of the area. Each proposed non designated heritage asset has been assessed against the Historic England Listing Criteria.</p>	<p>Policy UFF11 provides a local dimension and identifies 15 potential Non-Designated Heritage Assets which have been assessed using the Historic England guidance.</p>
UFF12: Dark Skies	<p>This policy is consistent with NPPF paragraph 191 c) which refers to the desire to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation.</p> <p>Policy UFF12 seeks to limit the impact of lighting from new development on dark skies.</p>	<p>This policy is consistent with Adopted Local Plan policies SCLP6.3, and 6.4 (relating to tourist development) and SCLP 10.4 (Landscape character) which contain criteria which seek to protect dark skies in the district.</p> <p>In addition Policy SCLP11.2 covering Residential Amenity seeks to ensure that minimising light spillage (pollution) is a consideration in determining applications for new development.</p>
UFF13: Access and connections	<p>This policy is consistent with paragraph 108 (c) of the NPPF which promotes opportunities for</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP7.1</p>

<p>Column A The Ufford Neighbourhood Development Plan Policy</p>	<p>Column B NPPF 2023</p>	<p>Column C East Suffolk Council – Suffolk Coastal Local Plan</p>
	<p>walking and cycling and is consistent with paragraph 96 (c) of the NPPF which supports healthy lifestyles through encouraging walking and cycling and paragraph 108 (c) which promotes walking and cycling as a preferred transport option.</p> <p>Policy UFF13 seeks to improve the health and wellbeing of residents through the provision of safe and attractive pedestrian and cycle routes. The policy is also consistent with paragraph 115 which considers the impacts of new development on highway safety.</p> <p>Policy UFF13 protects existing public rights of way unless they are to be unavoidably lost and requires alternatives where this occurs. The policy also sets out the criteria for enhancing rights of way.</p> <p>The policy adds a local dimension by identifying a specific route in the parish which would contribute to improved connectivity.</p>	<p>Sustainable Transport which requires new development to be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services, and facilities and provides safe pedestrian and cycle access to services and facilities.</p> <p>Policy UFF13 specifically refers to the need for new developments to contribute to the health and wellbeing of residents by increasing levels of walking and cycling and to the provision of safe and attractive pedestrian and cycle routes and crossings.</p> <p>This policy is in general conformity with Adopted Local Plan Policy SCLP7.1 criterion f) which seeks to ensure that development is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network.</p>

Column A The Ufford Neighbourhood Development Plan Policy	Column B NPPF 2023	Column C East Suffolk Council – Suffolk Coastal Local Plan
UFF14: Community facilities	<p>This policy seeks to retain existing community facilities is consistent with criterion c of paragraph 97 which urges planning policies to “guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs”.</p> <p>Policy UFF14 seeks to retain the existing community facilities within the parish and provides support for new facilities identified through public consultation .</p>	<p>There is no specific corresponding policy in the Adopted Local Plan that supports new community facilities in general terms.</p> <p>However Policy UFF14 identifies the services and facilities that exist in the village which would be covered by Adopted Local Plan Policy SCLP8.1 Community Assets and Facilities which seeks to resist the loss of valued community facilities and assets subject to criteria governing viability and replacement facilities. In addition Policies SCLP8.2 and SCLP 8.3 cover specific matters relating to open space and allotments.</p>
UFF15: New and existing business	<p>This policy is consistent with NPPF paragraph 85 which encourages planning policies to create the conditions in which businesses can invest expand and adapt.</p> <p>Policy UFF15 encourages the creation of new businesses and the expansion of existing businesses subject to criteria governing impacts.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP4.1 Existing Employment Areas which supports new development for employment uses in certain locations</p> <p>Policy UFF15 encourages the creation of new businesses and the expansion of existing</p>

Column A The Ufford Neighbourhood Development Plan Policy	Column B NPPF 2023	Column C East Suffolk Council – Suffolk Coastal Local Plan
		businesses subject to criteria governing impacts.
UFF16: Former Crown Nursery	<p>This policy is consistent with NPPF paragraph 29 which indicates that Neighbourhood Plans should not promote less development than that set out in the strategic policies for the area.</p> <p>The Neighbourhood Plan makes a specific allocation at the former Crown Nursery site for residential use (20-25 dwellings), allotments and community open space. The indicative housing requirement for the parish is met (and exceeded) by the policies in the Neighbourhood Plan. The policy sets out the criteria that the development of the site would need to meet.</p>	<p>This policy is consistent with Adopted Local Plan Policies SCLP3.1 Strategy for Growth and SCLP5.2: Housing Development in Small Villages. Policy SCLP3.1 criterion g) allows for 'Appropriate growth in rural areas that will help to support and sustain existing communities' and Policy SCLP5.2 allows for new residential development on Exception Sites adjacent or well related to defined Settlement Boundaries.</p> <p>Ufford is identified as a 'smaller village' in the Local Plan hierarchy and the proposed allocation in Policy UFF16, identified s a site suitable for 20-25 new dwellings which will include affordable housing and new allotments and green space provision on a site immediately adjacent to the existing settlement boundary, and which enables better footpath and cycle connections between the main built up are of the village</p>

Column A The Ufford Neighbourhood Development Plan Policy	Column B NPPF 2023	Column C East Suffolk Council – Suffolk Coastal Local Plan
		and village facilities. Furthermore, the site already has a planning permission for employment use .

Compliance with new Basic Condition e) a) i) and ii)

4.8 The Levelling Up and Regeneration Act introduced a replacement Basic Condition:

- e) a) the making of the order/Plan would not have the effect of preventing development from taking place which:
 - (i) is proposed in the development plan for the area of the authority (or any part of that area), and
 - (ii) if it took place, would provide housing.

4.9 The Adopted Development Plan for the area made provision for approximately 44 dwellings at Ufford (SCLP 2020). Subsequently, in January 2024, East Suffolk revised the 'indicative' figure' for Ufford to an additional seven dwellings. The 44 dwellings figure was a 'commitments figure' in that planning permissions already existed for those dwellings. The additional seven dwellings are accounted for as part of the site specific allocation made under Policy UFF16 at the former Crown Nursery site.

4.10 In order to be compliant with the new Basic Condition, the policies of the Ufford Neighbourhood Plan should not prevent any housing identified in the strategic planning policies from coming forward. Given that the figure contained in the Adopted Local Plan had already been committed, this additional Basic Condition is satisfied. Furthermore, the Neighbourhood Plan at paragraph 1.24 acknowledges the revised indicative figure which is addressed by the site allocation.

5. Compliance with Basic Condition d)

- 5.1 The NPPF 2023 states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.¹ The appraisal of the Ufford Neighbourhood Development Plan policies against NPPF policies presented above, demonstrates how policies in the Neighbourhood Plan comply with the NPPF and therefore deliver sustainable development.
- 5.2. The NPPF states that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).

Economic, social, and environmental objectives

- 5.3 These objectives give rise to the need for the planning system to perform a number of roles as defined by the NPPF and set out below.
- 5.4 The objectives and policies contained within the Ufford Neighbourhood Plan contribute towards each of these three objectives and cumulatively contribute to the achievement of sustainable development. How they achieve this is summarised below. Unsurprisingly, there is a degree of cross-over between policies and many contribute to more than one of the sustainable development objectives e.g. **UFF1 Design** which contributes to both social and environmental objectives.
- 5.5 The plan has been formulated with Sustainable Development at its heart. The embedded theme of sustainability is reflected in the overarching vision for the plan, which reflects the three distinct strands of sustainability – economic, environmental, and social.

¹ Resolution 42/187 of the United Nations General Assembly.

Vision

Ufford parish will maintain its distinctive and separate identity, protecting the spaces between us and the neighbouring villages to prevent coalescence. There will be a range of housing types and tenures to suit all ages, supported by good rural village amenities. Development will be environmentally, economically and socially sustainable. It will be well designed and fit within the character of the parish. Green spaces, the natural environment and local heritage will be protected. Ufford will continue to be an attractive village that meets the needs of its community.

- 5.6 This table below helps to demonstrate the Neighbourhood Plan's comprehensive contribution to sustainable development.

NPPF Sustainable Development	Contribution through The Ufford Neighbourhood Plan Objectives and Policies
<p>NPPF 2023 An economic objective: to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places, and at the right time to support growth, innovation, and improved productivity; and by identifying and co-ordinating the provision of infrastructure.</p>	<p>Community objective: To protect and enhance the parish's existing community facilities and supporting the development of appropriate new facilities.</p> <p>Business objective: To support appropriate new and existing small scale businesses and enable them to thrive in Ufford.</p> <p>Policy UFF2: New housing This policy seeks to focus new development within the existing settlement boundary or on identified sites. The policy approach ensures that that sufficient land is available to meet the local housing requirement for the parish.</p> <p>Policy UFF14: Community Facilities. This policy seeks to ensure that the infrastructure required to support new growth is properly identified and in place. The policy also seeks to protect existing community facilities from development that would adversely affect their community value.</p> <p>Policy UFF15: New and existing business. This policy provides support for new employment development and the expansion of existing businesses.</p>

NPPF Sustainable Development	Contribution through The Ufford Neighbourhood Plan Objectives and Policies
<p>NNPF 2023</p> <p>A social objective: to support strong, vibrant, and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p>	<p>Housing objective: To ensure that future housing development addresses the needs of the changing demographics of the village by providing a variety of housing of appropriate size and scale. New housing should ensure that the distinctive character of the village is maintained, should be well designed and environmentally and socially sustainable.</p> <p>Accessibility objective: To ensure that new development improves and enhances accessibility for both residents and visitors to the village, through protecting public rights of way and encouraging the creation of safe routes for pedestrians and cyclists, which connect to village services.</p> <p>Community objective: To protect and enhance the parish's existing community facilities and supporting the development of appropriate new facilities.</p> <p>Policy UFF1: Design. This policy is supported by the Ufford Design Guidelines and Codes and seeks to ensure that all new development is well designed, locally distinctive, reflects the character of the parish and enhances its quality.</p> <p>Policy UFF2: New housing This policy seeks to focus new development within the existing settlement boundary or on identified sites. The policy approach ensures that that sufficient land is available to meet the local housing requirement for the parish.</p> <p>Policy UFF3: Housing Mix. This policy supports new housing development which will meet the current and future housing needs of the local community. It is supported by the Housing Needs Assessment.</p> <p>Policy UFF4: Rural and community-led exception sites. This policy supports proposals</p>

NPPF Sustainable Development	Contribution through The Ufford Neighbourhood Plan Objectives and Policies
	<p>for rural and community led housing schemes which are addressing and proven housing need</p> <p>Policy UFF13: Access and connections. This policy seeks to make Ufford a safer and more accessible community and encourages the provision of new pedestrian and cycle routes whilst protecting the existing provision. The policy identifies a specific route which would enhance the accessibility of the parish's key community facilities.</p> <p>Policy UFF14: Community facilities: This policy identifies the existing community facilities in the parish which are to be protected under Local Plan policy. The policy also expresses support for the provision of new community facilities which have been identified through community consultation.</p> <p>Policy UFF15: New and existing business. This policy provides support for new employment development and the expansion of existing businesses, to provide potential opportunities for local employment.</p> <p>Policy UFF16: Former Crown Nursery/ This policy allocate the former Crown Nursery site for residential development (including affordable housing and some bungalows) together with the provision of allotments and community open space. This allocation would replace the existing permitted use of the site for commercial development.</p>
<p>NPPF 2023</p> <p>An environmental role: to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural</p>	<p>Environment objective: To protect the rural landscape setting, green spaces and historic environment of the parish, whilst promoting, managing and enhancing its existing wildlife/biodiversity assets and encouraging an active environmental role for the community.</p>

NPPF Sustainable Development	Contribution through The Ufford Neighbourhood Plan Objectives and Policies
<p>resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	<p>Policy UFF1: Design. This policy is supported by the Ufford Design Guidelines and Codes and seeks to ensure that all new development is well designed, locally distinctive, reflects the character of the parish and enhances the quality of the built environment.</p> <p>Policy UFF5: Local Green Spaces. This policy identifies 14 existing green spaces that are demonstrably special to the local community, in accordance with the criteria set out in the NPPF.</p> <p>Policy UFF6: Landscape character and The Water Meadows. This policy seeks to ensure that the important landscape setting and character of Ufford is protected from development which would adversely affect its quality. Furthermore the policy identifies The Water Meadows as a locally distinctive and special landscape feature of the parish.</p> <p>Policy UFF7: Important Views. This policy identifies 15 important public views considered to be of environmental importance and landscape value to the community.</p> <p>Policy UFF8: Biodiversity/nature conservation. This policy seeks to improve the biodiversity of the parish by seeking a net gain for biodiversity from new developments and encourages new planting and the incorporation of wildlife friendly measures into new developments.</p> <p>Policy UFF9: Ecological corridors. This policy identifies the existing important ecological corridors in the parish and supports their retention, improvement and enhancement.</p> <p>Policy UFF10: Historic environment. This policy supports development which protects and enhances the historic environment of Ufford.</p>

NPPF Sustainable Development	Contribution through The Ufford Neighbourhood Plan Objectives and Policies
	<p>Policy UFF11: Non-Designated Heritage Assets. This policy identifies 15 Non-Designated Heritage Assets that are considered to make an important contribution to the local historic character of the parish.</p> <p>Policy UFF12: Dark Skies. This policy encourages the preservation of dark skies within the parish and seeks to minimise light pollution.</p> <p>Policy UFF16: Former Crown Nursery. This policy makes an allocation for residential development which also includes the provision of new allotments and new community green space.</p>

6 Compatibility with Basic Condition f)

- 6.1 The statement below demonstrates how the Ufford Neighbourhood Development Plan does not breach and is compatible with all relevant EU obligations. The United Kingdom formally left the European Union on the 31st of January 2020, which was followed by an 11-month transition period that expired on 31st December 2020. Basic Condition (f) of the Neighbourhood Plan Regulations 2012 requires that the making of a Neighbourhood Plan should not breach nor be incompatible with European Obligations. These include those relating to environmental matters such as Habitats and Species.
- 6.2 Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) are required to be carried out with regard to the Conservation Objectives of any European Protected Wildlife Sites deemed to be within a relative proximity of the Ufford Neighbourhood Plan Area. There are no nationally or internationally designated sites within the Ufford Neighbourhood Area, however the majority of the Ufford parish lies within the SSSI Impact Risk Zones for the Deben Estuary Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar Site, and the Sandlings SPA which is located to the south of Ufford.
- 6.3 East Suffolk District Council recommends that the screening processes in respect of both SEA and HRA be undertaken just prior to Pre-Submission stage. A Screening Report for both regulations was produced in January 2024 by East Suffolk Council, who then consulted the three Environmental Bodies during January and February 2024. The Screening Opinions were finalised by East Suffolk in April 2024. The SEA Screening Opinion concluded that due to the fact that the Neighbourhood Plan proposed to make an allocation for new development, the Plan was therefore 'screened in' for Strategic Environmental Assessment.
- 6.4 The Parish Council commissioned consultants AECOM to undertake the SEA work in April 2024. AECOM produced an SEA 'Scoping report' in April 2024 and consulted the three environmental bodies on the scope of the SEA. This consultation was carried out between May and June 2024. Following the results of that consultation AECOM produced a draft SEA 'Environmental Report' in September. The Environmental Report examined alternative growth options for Ufford in respect of the indicative local housing requirement, as well as assessing the sites that were put forward during the *Call for Sites* process held in Autumn 2023. The draft Environmental Report contained one recommendation as follows:

“Given that several locally listed monuments on the Suffolk Heritage Explorer have been identified in the area surrounding the proposed site allocation. On this basis, the SEA recommends that additional text could be included in a relevant policy which reflects the potential presence of local monuments, along with precautionary measures should a monument be identified during the construction of the development.”

- 6.5 The draft Environmental report recommendation was considered by the Neighbourhood Plan Steering Group in September 2024 and agreed to reflect the proposed wording from the report through an amendment to **Policy UFF10 Historic Environment**. The final SEA Environmental Report was finalised in October 2024 and reflects that the Neighbourhood Plan has been amended to reflect the conclusions of the draft Environmental Report.

Human rights

- 6.6 In addition the Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. The accompanying Consultation Statement sets out the process followed in terms of community involvement. The Neighbourhood Plan is seeking to protect both non-designated heritage assets and local green spaces, some of which are in private ownership. Private land/property owners have been notified of the contents of the plan both prior to the Pre-Submission consultation but also as part of that consultation process. They received specific notification letters on both occasions and many have responded through the consultation.

7 Compatibility with Basic Condition (g)

- 7.1 An additional basic condition is prescribed under Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 as follows:

“The making of the Neighbourhood Development Plan is not likely to have any significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2010 (2)) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c) Regulations 2007 (3)), (either alone or in combination with other plans and projects)”.

- 7.2 The purpose of the Habitat Regulations Assessment (HRA) is therefore to ensure the protection of European (Natura 2000) sites. These sites are designed to form an ecologically coherent network of designated sites across the whole of Europe. Referred to as 'European Designated Sites,' Natura 2000 sites include Special Protection Areas (SPAs) and Special Areas for Conservation (SAC).
- 7.3 An HRA Screening Report was produced by East Suffolk Council in January 2024. Consultation on the HRA Screening Report was carried out by East Suffolk Council in January 2024 with Natural England. The screening assessment identified **Policy UFF17 (now UFF16) Former Crown Nursery Site and Policy UFF2: New housing**, as having potential *Likely Significant Effects* on Habitat Sites as the result of increased recreational disturbance. As a result, both policies were subject to further consideration through *appropriate assessment* which was undertaken by East Suffolk Council .
- 7.4 The impact of increased recreation arising from housing growth has already been recognised in East Suffolk's Local Plan HRA work. This has led to collaborative working between the four Suffolk local planning authorities that lie within 13km of the coastal and heathland Habitat Sites. Taking a strategic approach to the Habitat Site mitigation has resulted in the development of the **Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)**. The Strategy sets out a tariff based approach to mitigating the additional recreation pressure risks associated with new residential development. The RAMS sets out an integrated suite of avoidance and mitigation measures that are supported by comprehensive evidence and experience gained from other Habitat Site mitigation strategies.
- 7.5 As confirmed by the conclusions of the Suffolk Coastal Local Plan HRA, The Suffolk Coast RAMS is considered to provide adequate measures to mitigate any impacts arising from planned housing growth.
- 7.6 The conclusions of the appropriate assessment were as follows:
 "Any residential development coming forward as the result of policies included in the Ufford Neighbourhood Plan will be subject to the RAMS tariff as per Policy SCLP10.1 Biodiversity and Geodiversity of the East Suffolk Council – Suffolk Coastal Local Plan (Adopted September 2020). It is therefore concluded that the draft Ufford Neighbourhood Plan will not lead to any adverse effects on protected Habitat Sites."
- 7.7 Natural England confirmed in their response dated 9th April 2024, that they agreed with the conclusion reached by East Suffolk Council that the Suffolk Coast RAMS would provide sufficient mitigation to ensure

that the Plan does not result in an adverse effect on the integrity of the habitat sites.

- 7.4 It is therefore considered by the Parish Council, as the relevant Qualifying Body, that the Neighbourhood Plan meets the additional prescribed basic condition.