

Response of the Ufford Neighbourhood Plan Steering Group to the Independent Examiner's Clarification Note

Policy UFF1

This is a good policy which is underpinned by the Design Guidelines and Codes. In the round, it is an excellent local response to Section 12 of the NPPF.

UNPSG Response: Noted

Policy UFF2

I am satisfied that the final part of the policy is locally-distinctive.

However, does the remainder of the policy bring any added parish-based value above the content of national and local planning policies?

UNPSG Response: The policy sets out the local emphasis on locating new housing development close to the existing facilities in the parish and ensuring that new development enhances the form, character, and setting of the built up area which is more locally distinctive and goes beyond both national and local policies e.g. specificity about the prevailing building line and avoiding the development of garden land

Policy UFF4

I am satisfied that the Site Selection element of the policy is locally-distinctive.

Does the remainder of the policy bring any added parish-based value above the content of national and local planning policies?

UNPSG Response: It is acknowledged that the 'principle' section of the policy contains similar criteria to those in Policy SCLP5.1, although UFF4 presents this in relation to community led housing as well as rural exceptions sites which SCLP5.1 does not. It is also noted that East Suffolk are due to begin a review of their Local Plan in September 2025 and therefore the UNPSG is conscious that existing SCLP policies will change over the life of the UNP

Policy UFF5

I looked carefully at the proposed Local Green Spaces during the visit. I saw their importance to the character and appearance of the parish.

The approach taken is underpinned by the details in Appendix B. Furthermore, the policy takes the matter-of-fact approach expected in the NPPF.

UNPSG Response : Noted

Policy UFF6

I saw the importance of the River Deben Valley during the visit. For clarity does the whole of the third part of the policy relate to this area (as defined on Figure 24)?

UNPSG Response: Yes, the third paragraph of the policy relates to the area shown in Figure 24

Policy UFF8

The policy takes a very positive approach towards biodiversity.

UNPSG Response: Noted

Policy UFF9

The policy takes a very positive approach towards ecological corridors.

In this broader context, I am minded to recommend that the order of the policy is revised so that the final part (on definitions) is weaved into the first part. Does the Parish Council have any comments on this proposition?

UNPSG Response: No objection to the proposed modification.

Policy UFF10

What is the intended purpose of the bold text in the policy? Could it be weaved into a consolidated version of paragraph 7.41 of the Plan?

UNPSG Response:

We believe the Examiner is referring to the final paragraph of the policy after the bold text. No objection to this being transferred to paragraph 7.41.

Policy UFF11

This is a good, locally-distinctive policy.

UNPSG Response: Noted

Policy UFF13

The general approach taken in this policy is very appropriate. However, the first and third parts read more as statements of intent rather than land use policies which would directly affect development proposals. Please can the Parish Council explain its intentions?

UNPSG Response: In the first part of the policy the intention is to set out the practical ways in which opportunities to improve the health and well-being of residents can be achieved through new development e.g. through the provision of appropriate new and

pedestrian cycle routes. The paragraph acts as a high level reminder to developers to ensure that their schemes include such provision.

The third part of the policy provides guidance for the creation of new networks both in terms of providing a cohesive network and ensuring connections to the wider countryside and neighbouring villages, including the bigger parishes. There are examples of Active Travel initiatives in surrounding parishes which such longer distance routes could connect with such as Woodbridge and Wickham Market. See [Active Travel Woodbridge](#) and <https://www.discoversuffolk.org.uk/walk/wickham-market-circular-walks-the-mill-route/>

Is the second part of the policy intended to be applied in a proportionate way and where it is practicable to do so?

UNPSG Response: Yes, Paragraph 2 of the policy is expected to be applied proportionately and where practicable to do so, dependent upon size, or location or nature of the proposed development.

Policy UFF14

The general approach taken in this policy is very appropriate Nevertheless I am minded to recommend that the first part is relocated to the end of the policy. Does Parish Council have any comments on this proposition?

UNPSG Response: No objection to this proposed modification

Policy UFF16

I looked at the former Crown Nursey site carefully during the visit. I noted its position adjacent to the recently-constructed houses to the north. I also note the support offered to the policy by the site owner.

The policy is well-considered. However, a few questions arise:

- a) could the number of houses to be delivered on the site in criterion a be revised to read as 'approximately 25 homes' without affecting the collaborative way in which the policy has been developed? I raise this point as the policy would prevent otherwise acceptable proposals coming forward which were slightly outside the defined window of 20-25 homes.
- b) does the reference to eight allotments relate to the area of land identified for such uses on Figure 33, or to local demand (or to both matters)?
- c) in criterion i is the 'adjacent woodland areas including (the) existing pond' the area shown on figure 33?

UNPSG Response:

a) UNPSG has some concerns over the use of the word 'approximate' and how much flexibility would be given by the LPA in applying this. This nervousness comes from the experience of the Framlingham Neighbourhood Plan, specifically Policy FRAM25: Land off Victoria Mill Road. The policy uses the word approximately – 'approximately 30 dwellings'. Planning permission has been granted on the site for both 35 dwellings

and for 49. Ref Nos: DC/22/2831/Out and DC/20/3326/OUT. This level of increase would not be appropriate for Ufford and significantly change the character of the area. The UNPSG understand the need for some flexibility for site layouts, however the uncertainty over whether 'approximately 25 homes' could mean 30, 35 or 40 homes is a major concern. The UNPSG would support 'up to 25 dwellings' if that was helpful

b) The number 8 was the level of interest in the Household Survey and is also (when taking standard allotment measurements) the number that could be achieved on the area of land at the north and east of the site. It is also a number which the PC feel they can realistically manage.

c) Yes – the green area.

Representations

I would find it helpful if the Parish Council commented on the representations from:

- Anglian Water; and
- Environment Agency.

East Suffolk Council proposes a series of detailed refinements to the policies and the supporting text. It would be also helpful if the Parish Council commented on those suggestions.

UNPSG Response to Representations (as directed):

Respondent	Summary:	Suggested UNPSG Response
Anglian Water	a) Infrastructure Capacity	a) No objection to including cross reference to Local Plan Policies if Examiner considers it appropriate.
	b) Water resources	b) Some examiners tend to remove wording from policies which include requirements which are above those currently required by Building Control Regulations. The Local Plan already includes the 110 ltr standard and the 100ltr standard is still under review nationally and therefore the justification for requiring it in the UNP is unclear. The UNPSG is unsure whether the intent is for the 100ltr standard to be included in the site specific policy or another policy such as UFF1. It is noted that the Environment Agency recommend the 110ltr figure. Therefore UNPSG has some nervousness as to the robustness of the rationale and whether introducing this requirement at a late stage would require further consultation as it may impact upon the viability of developments.
	c) Surface Water Drainage and UFF16	c) Support noted.
	d) UFF5 Local Green Spaces	d) Comments noted. It is not the intention to prevent access to AW assets.

Respondent	Summary:	Suggested UNPSG Response
	e) UFF Ecological corridors	e) It is not the intention to prevent access to AW assets. No objection to the insertion of a reference to Local Nature Recovery Strategies in the supporting text if the Examiner is so minded.
	f) Design Guidelines and Codes	Section 2.4 point 6 – UNPSG can ask AECOM to correct error. Section 4.1 Checklist - UNPSG can ask AECOM to correct errors relating to 1, 8 and 10.
Landex Limited	Support for UFF16	Support noted.
Sport England	Standing advice for NPs	Response noted.
East Suffolk Council	a) General Comments	a) Examiner has already sought clarification on potential repetition of Local Policy in UFF2 and UFF4 (see above) . References to NPPF 2024 can be included if required by Examiner.
	b) Introduction	b) Errors can be corrected.
	c) Ufford Parish	c) No objection to mapping amendments or inclusion of additional CWS.
	d) Vision and objectives	d) UFF8 can be added to diagram

Respondent	Summary:	Suggested UNPSG Response
	e) Policies and Projects	<p>It is noted that this is not a Basic Conditions Issue.</p> <p>Figure 21 in the Submission Version of the Plan , provides some prioritisation of UPC projected CIL spend. It is recognised that this is a 'snapshot in time'. It includes the burial ground and the allotments which are also listed in the policy. The CIL spend priorities are reviewed regularly by the Parish Council , and the process employed by the Parish Council to do so its proportionate to its resources available. It is unreasonable for ESC to expect the level of detail being sought in relation to the burial ground and also for the Parish Council to change their process. The UNMPSG recognises that priorities will change in the parish over the length of the Plan period as new information and opportunities come forward or where some opportunities are no longer available. Therefore a degree of flexibility is required as some elements may change and also their prioritisation may change. Including an overly rigid prioritised list in the Neighbourhood Plan may see it overtaken by events relatively quickly, superseded and out of date.</p> <p>A link between Figure 21 and the policy can be inserted for ease of reference.</p> <p>This is not a Basic Conditions issue.</p>

Respondent	Summary:	Suggested UNPSG Response
	f) UFF1 Design	<p>f) Examiner's comments in relation to UFF1 above are noted. A number of the comments relating to this policy from ESC have not been previously raised.</p> <p>The policy is detailed but the criteria carry development plan weight which would not be the case if the policy simply referred to the Design Code which is a supporting document. By shortening the policy to simply cross referring to a longer document which is the Design Code this would seem to weaken the weight of the important localised design elements which is a key driver for the Neighbourhood Plan. UNPSG preferences is for the key design criteria to be in the policy where it is easily accessible by a case officer, by moving the emphasis to an additional document without the policy lead there is a risk that the Design Code will not be as rigorously implemented or enforced.</p> <p>Comments relating to typos/footnotes etc can be corrected.</p> <p>Comments relating to orientation of dwellings towards open spaces was raised previously and the views of UNPSG expressed in Appendix 6c) of the consultation statement in relation to response 46. This remains the position.</p> <p>Parking – see comments in relation to cross references above.</p> <p>Street Trees: NPPF Para 136 makes reference to the need for new streets to be treelined. References to street trees have been inserted by examiners into plans elsewhere in Suffolk e.g. Acton in Babergh District, where the examiner inserted the following wording into ACT2: Design and Character “<i>All new development should include treelined streets unless in specific cases there are clear justifiable and compelling reasons why this would be inappropriate.</i>” Acton Neighbourhood Plan - Babergh District Council - babergh.gov.uk / midsuffolk.gov.uk</p> <p>The reference to UFF15 and 'homeworking' is in the context of the conversion of existing buildings and is better placed in UFF15..</p>

Respondent	Summary:	Suggested UNPSG Response
	g) UFF2 New housing	g) See also response to Examiner's Questions on UFF2 above. No objection to including reference to the Settlement Sensitivity Assessment in the supporting text.
	h) UFF3 Housing Mix	h) Comments noted.
	i) UFF4 Rural and Community led exception sites	i) See response to Examiner's Questions on UFF4 above.
	j) UFF8 Biodiversity	j) No objection to suggested amendments
	k) UFF12 Dark Skies	k) No objection to inclusion of BCT Conservancy guidance note in the supporting text.
	l) UFF14 Community Facilities	l) Comments noted. The prioritisation of new facilities has not been undertaken in the manner requested and therefore cannot be added to the NP at this late stage. It is not a requirement or a Basic Condition matter.
	m) UFF15 New and existing business	m) See response to UFF1 on the same issue. The preference would be to retain it in UFF15.
	n) UFF16 Crown Nursery	n) No objection to proposed amendments. See also response to Examiner's Question in respect of UFF16 above.
	o) Design Guidelines and Codes	o) This will be updated
Environment Agency	a) Environment Agency guidance on Groundwater Protection	No objection to including suitable reference in the text. .

Respondent	Summary:	Suggested UNPSG Response
	b) Water resources	b) A potential conflict with the response from Anglian Water. See above. UNPSG unsure where in the Plan such a requirement would be best located and also how it could be justified on a Neighbourhood Area basis
Christopher Goodall	LGS 6	There is a reference to an area of land at Church Lane in Appendix B under LGS 6 . The paragraph has been retained in error and should be removed.
Historic England	Standing advice	Response noted
National Highways	No objection	Response noted
Natural England	No comments	Response noted
Suffolk County Council	Reference to Minerals and Waste	No objection to inclusion of suggested references
Suffolk Wildlife Trust	UFF8 Biodiversity	It is noted that the SWT list of CWS in the parish differs from the ESC CWS list. It is suspected that SWT are including land that is not within the parish boundary and that the ESC suggested CWS are the correct ones. It would be helpful if this could be clarified by ESC.