

## **Ufford Neighbourhood Development Plan**

### **Independent Examiner's Clarification Note**

#### ***Context***

This note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt, matters of clarification are entirely normal at this early stage of the examination process.

#### ***Initial Comments***

The Plan is very well-presented. The distinction between the policies and the supporting text is very clear. Photographs produced to a high quality reinforce the issues included in the Plan. The various Assessments and other supporting documents directly inform the relevant policies.

The Plan provides a clear and distinctive vision for the neighbourhood area and has focused on appropriate and locally-distinctive matters.

#### ***Points for Clarification and other comments on the policies***

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise some initial issues for clarification for the Parish Council.

The comments that are made on these points will be used to assist in the preparation of my report. They will also inform any potential modifications that may be necessary to the Plan to ensure that it meets the basic conditions.

#### ***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.

#### ***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?

#### ***Policy UFF4***

I am satisfied that the Site Selection element 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?

#### ***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.

*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)?

*Policy UFF8*

The policy takes a very positive approach towards biodiversity.

*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?

*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?

*Policy UFF11*

This is a good, locally-distinctive policy.

*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?

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

*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?

*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:

- 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.
- 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)?

- in criterion i is the 'adjacent woodland areas including (the) existing pond' the area shown on figure 33?

### ***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.

### ***Protocol for responses***

I would be grateful for responses to the questions raised by 19 February 2025. Please let me know if this timetable may be challenging to achieve. It reflects the factual basis of the questions raised.

If certain responses are available before others, I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled, please can all responses be sent to me by East Suffolk Council and make direct reference to the policy/issue concerned.

Andrew Ashcroft

Independent Examiner

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29 January 2025