

# Neighbourhood Planning Guidance for Climate Change

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# Neighbourhood Planning Guidance for Climate Change

## 1. Introduction

Climate change, and the need to mitigate the impacts, is an issue that local communities can help to address. Neighbourhood Plans can be a key tool for ensuring new infrastructure and development responds more effectively to potential climate change impacts by incorporating appropriate adaptation and mitigation measures.



*Coastal erosion, Covehithe*

## Local climate change issues

The term 'climate change' refers to the long-term shifts in temperatures and weather patterns on Earth. The climate change impacts that could specifically affect East Suffolk over the coming years include:

### **Increased temperatures (air and water):**

- Increased air and water temperatures (including acute heat waves) may cause an increased risk of flooding (and associated damage and danger to life) and coastal erosion (increased sea level rise and storm conditions), as well as negative impacts on crop yields and marine environments, reducing food security, health, and economic activity.

- Increased air and water temperatures impact habitats and migration patterns of animal species, potentially reducing biodiversity in flora and resident and/or visitor fauna.
- Increased air temperatures may cause buildings to overheat, impacting health and wellbeing, and in extreme cases may be a danger to life, particularly for more vulnerable members of the population.
- Increased air temperatures may have physical impacts on transport systems, creating disruptions and potentially reducing safety.

**Warmer, wetter winters:** rainfall is unpredictable, but the UK is projected to have increased rainfall in winter. Heavy rainfall and increased winter storms are more likely. This may cause flood damage to property and/or crops, and therefore impacts on food security. In extreme flooding incidents there may be danger to life.

**Hotter, drier summers:** although summers are projected to be hotter and drier, some wetter summers are also possible. Heatwaves in summer are now more likely to occur due to climate change. Drought impacts reduce food security and fresh water supply. This may necessitate hose pipe bans or other freshwater rationing, and may mean development is unable to progress (particularly commercial and intensive agricultural). Measures may be limited to areas where freshwater is most limited, or district wide, and may be temporary or more permanent.



*Framlingham. Flooding after Storm Babet (2023)*

**An increase in severe weather incidents:** storm damage to property and transport systems, fallen trees, localised flooding incidents and secondary impacts such as power cuts and impacts on important supply chains. In extreme incidents there may be danger to life.

Information on how to explore climate change risk at Local Authority (East Suffolk) level, is available via the [Met Office Climate Data Portal](#).

**Risks to health:**

Climate change poses significant risks to human health, both directly and indirectly. Extreme weather events such as heatwaves, storms, and flooding can cause injuries, exacerbate existing health conditions including cardiovascular and respiratory diseases and, in severe cases, pose a danger to life. The [Local Climate Adaptation Tool](#) provides valuable insights into how these climate risks specifically affect weather and health.

## Climate change mitigation and adaptation

Climate change is already affecting the way we live, impacting the air we breathe, the water we drink, the food we eat, our wellbeing and our homes. Evidence suggests that in Suffolk, we are likely to face more extreme heat, increased flooding, and increased risk of mortality from heart, lung, and brain diseases as a result.

Neighbourhood Plans can guide how new developments respond to these challenges and help create healthier, greener, and more sustainable places for everyone. This can be achieved by incorporating two key measures:

- **Mitigation:** Taking actions to reduce or prevent the release of greenhouse gases, such as promoting renewable energy sources, improving energy efficiency, and encouraging sustainable transport.
- **Adaptation:** Making changes to prepare for and cope with the impacts of climate change that are already happening or likely to occur, such as designing buildings to withstand extreme weather, managing flood risks, and creating green spaces to help regulate temperatures.

## Neighbourhood Plans

Neighbourhood Plans provide an important opportunity for communities to identify their priorities and preferences for what, how, and where new development and infrastructure should be delivered in their area over a set plan period (usually 15 years).

Neighbourhood Plans are created by the local community. They apply to a geographical area (the 'Neighbourhood Area') defined by the community. Often this is a whole Parish, but it can be larger or smaller than this.

Neighbourhood Plans set out a vision which responds to local issues and addresses the needs and aspirations of the community. This vision can cover a wide range of topics that are important to local people. To help deliver the vision, Neighbourhood Plans set out planning policies which, once made (adopted), will be a key consideration for the determination of planning applications in the Neighbourhood Area, and will therefore directly shape new development and prioritise community infrastructure to support growth.

The Parish or Town Council (as applicable) will play an important role, but the Plan must be based on a shared vision which reflects the wishes of the community. Neighbourhood Plans are not compulsory, they are an optional tool for communities who wish to have more of a say in planning for their area. East Suffolk Council have a duty to provide assistance to groups preparing a Neighbourhood Plan.

Once made (i.e. adopted), Neighbourhood Plans become part of the Development Plan for the area. This means that they function alongside the relevant Local Plan. East Suffolk has two local plans in place:

- The [East Suffolk Council Suffolk Coastal Local Plan](#), adopted in 2020, which covers the former Suffolk Coastal District Council area.
- The [East Suffolk Council Waveney Local Plan](#), adopted in 2019, which covers the former Waveney District Council area.

Part of the East Suffolk district falls within the Broads Authority area. For this part of the district, the '[Local Plan for the Broads](#)' will be the relevant Local Plan.

The Neighbourhood Plan, the Local Plan, and the [National Planning Policy Framework](#) (NPPF) provide the planning policy framework for deciding planning applications. A Neighbourhood Plan should not repeat elements of local or national planning policy.

## How can Neighbourhood Plans help to address climate change issues?

Neighbourhood Plans can be used by communities to create their own policies on matters that are important to them, subject to [basic conditions](#) such as having regard for national and local plan policies. Communities may want to address matters related to climate change (e.g. active travel infrastructure for walking and cycling), to allocate sites for types of development, add local detail and community preferences to the policies of the adopted Local Plan (e.g. what specific *types* of green infrastructure are required on a site where green infrastructure is stated

as required), and set their priorities for community infrastructure delivery over the plan period. Neighbourhood Plans can also identify non-planning 'community actions' that relate to policy areas covered by the plan.

**Neighbourhood Plans can take forward climate change action policies through:**

- **Allocating sites for specified types of development**, including for renewable and low carbon energy schemes, or directly delivering important infrastructure improvements for increasing climate change resilience (including ensuring a site in close proximity to an area known to be at risk of flooding allows space to accommodate excess volumes offering betterment over the existing scenario). Site allocations can also include specific criteria about how the community wants that specific site to be developed – which could include a clear design focus on climate change resilience, and the need for this to be set out. Neighbourhood Plans can also make small amendments to Settlement Boundaries to enable this.
- **Setting design policies that support and encourage lower-carbon buildings and lifestyles**, by encouraging voluntary exceedance of Building Regulations minimums. Government advice for exceeding Building Regulations relates to Local Plans. No known Neighbourhood Plans have set higher standards for carbon emissions than Building Regulations and Local Plan policy minimums as a *requirement*, however Neighbourhood Plans can encourage and support voluntary exceedance. Neighbourhood Plan policies can support lower-carbon lifestyles by ensuring homes include adequate secure cycle parking storage space, include rainwater harvesting to reduce potable water demand, and are supported by adequate sustainable transport infrastructure (e.g. cycling and walking routes).
- **Setting topic-based policies**, e.g.:
  - Green infrastructure policies that prioritise carbon sequestration, habitat creation, space for community food production.
  - Blue infrastructure policies that prioritise the use of nature based sustainable drainage schemes (SuDS) to manage surface water runoff from new developments effectively to ensure flood risk into the future is not increased. Sites which are located in, or adjacent to areas at existing risk of flooding should be encouraged to allow extra space for water to be stored in times of excess volumes to reduce risk elsewhere in the catchment.
  - Biodiversity policies that encourage voluntary exceedance of statutory minimum net gain and help biodiversity adapt to climate change.

- Sustainable construction policies that encourage voluntary exceedance of minimum Building Regulations for energy and water efficiency (including rainwater harvesting).
- Active travel policies that require high-quality infrastructure design and improved connectivity and continuity of the active travel network in the area.
- **Cross-referencing specific sections of East Suffolk Council’s [supplementary planning documents](#)** (SPDs) where this supports their policies’ criteria. The most relevant SPDs for Neighbourhood Plans’ climate change policies are the [Sustainable Construction SPD \(2022\)](#) and the [Healthy Environments SPD \(2024\)](#).
- **Setting priorities for spending on infrastructure projects** to guide the community’s spending of its Community Infrastructure Levy (CIL) receipts from new housing development in their area (see CIL section below).
- **Adding local detail to existing Local Plan site allocations’ policy criteria** (e.g. where a site is required to provide green infrastructure, detailing what *types* or *where* on site they would like green infrastructure to be provided).
- **Include ‘community actions’** (see section below) that support relevant topic areas to climate change.

## Community Infrastructure Levy (CIL): funding infrastructure using CIL receipts

East Suffolk Council is a Community Infrastructure Levy (CIL) charging authority, which means that most net new housing development<sup>1</sup> within the district boundaries will be liable to contribute towards the cost of new infrastructure at district scale (some other development types are also CIL-liable).

CIL payments are normally paid to East Suffolk Council by developers in addition to on-site infrastructure delivery. However, on specified larger sites that are delivering significant new onsite infrastructure (e.g. a new school) and/or funding specific local improvements (e.g. a local GP surgery extension) the CIL rate is lower or zero-rated. The district’s CIL charges vary by location and are set out in the East Suffolk CIL Charging Schedule and its supporting map<sup>2</sup>.

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<sup>1</sup> Further information is available via the Community Infrastructure Levy section of the Planning Practice Guidance, available at: <https://www.gov.uk/guidance/community-infrastructure-levy#relief-and-exemptions>.

<sup>2</sup> Available at: <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/cil-rates/approved-cil-rates-for-the-east-suffolk-area/>.

Town and Parish Councils receive 15% of the CIL collected from new housing development in their area, unless they have a made (adopted) Neighbourhood Plan in place, in which case it increases to 25%; this allocation is referred to as 'Neighbourhood CIL' (N'CIL). Once received, Town and Parish Councils can spend those funds on a wide variety of community infrastructure projects and enjoy a high degree of flexibility. An example of community infrastructure projects that are relevant to action on climate change is new sustainable transport infrastructure, such as new walking and/or cycling routes (including new Public Rights of Way) or cycle/scooter parking (active travel infrastructure) provision. Town and Parish Councils are also able to use their N'CIL to do feasibility studies, where further investigation into different options is needed.

Communities must normally spend CIL receipts within five years (otherwise it may be clawed back), so are encouraged to be proactive and have project ideas lined up. The recommended way of doing this is through Neighbourhood Plans, and the inclusion of an Infrastructure Priorities List. The list can be ranked in accordance with community priorities (as identified through engagement and consultation activities during the preparation process for the Neighbourhood Plan). Once infrastructure needs have been identified, they can be prioritised as 'critical', 'essential' and 'desirable' infrastructure requirements within the Neighbourhood Plan. Alternatively, Town and Parish Councils can create [Parish Infrastructure Investment Plans](#), that simply set out a list of projects. Two good examples of Neighbourhood Plans in East Suffolk that include Infrastructure Priority Lists are [Wickham Market Neighbourhood Plan](#) and [Playford Neighbourhood Plan](#).

Town and Parish Councils also have the option of applying (bidding) to East Suffolk Council for funding through the 'Local CIL' (L'CIL) funding pot, where successful bids can match fund N'CIL to deliver higher cost (but higher community value) projects.

After a Neighbourhood Plan is made, infrastructure projects which have been prioritised in the plan will be added to East Suffolk Council's Infrastructure List within the [Infrastructure Funding Statement](#) at the next annual review point.

More detailed CIL guidance for Town and Parish Councils is available on East Suffolk Council's website<sup>3</sup> and from Locality<sup>4</sup>.

## What are 'community actions'?

Community actions are non-planning commitments related to issues raised by the local community during the consultations. Neighbourhood Plans are not required to have community actions. Community actions can be included in the Neighbourhood Plan for either the

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<sup>3</sup><https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/parish-support/>. See in particular the 'CIL parish guidance' document for more detailed general guidance.

<sup>4</sup> <https://neighbourhoodplanning.org/toolkits-and-guidance/understanding-community-infrastructure-levy-cil/>.

community as a whole, a specific task group, or the Town/Parish Council (Qualifying Body) to undertake.

Community actions could include encouraging homeowners to install water butts, raising awareness in the community of the [Warm Homes Suffolk](#) project, installing EV charging points in car parks owned by the Town/Parish Council, setting up a voluntary group to draft responses to energy schemes determined by the Council as well as Nationally Significant Infrastructure Projects (NSIPs), or providing an emergency response plan that identifies existing properties at risk of flooding and working with owners to ensure they have adequate flood response plans in place. Community actions can be integrated into the Neighbourhood Plan with each topic/chapter having a Neighbourhood Plan policy and/or community action. Alternatively, community actions can be listed in a separate chapter in the Neighbourhood Plan or in an appendix.

[Beccles Neighbourhood Plan](#) and [Worlingham Neighbourhood Plan](#) have a dedicated chapters on community actions/non-policy areas. They cover a number of matters requiring action that are linked to the Neighbourhood Plan's vision and objections which are either not planning policy issues or within the scope of neighbourhood planning. The [Bungay Neighbourhood Plan](#) has, where relevant, listed community actions alongside Neighbourhood Plan policies with each colour coded to assist the reader.

## General guidance on preparing or reviewing a Neighbourhood Plan

General guidance on the process of preparing new and reviewing made Neighbourhood Plans is available on [the Council's website](#).

East Suffolk Council offers support to Neighbourhood Plan Groups through a dedicated Planning Policy Officer. The officer acts as a main point of contact for advising on the content and process for preparing the Plan throughout the development of the plan from designation of the Neighbourhood Plan area through to examination. East Suffolk Council also has range of officers that can offer specialist advice including Ecology officers, Arboriculture and Landscape Officers, Design and Heritage Officers, and Rights of Way Officer.

## What type of climate change issues could a Neighbourhood Plan help to address?

There are different types of climate change issues that a Neighbourhood Plan could address – this document includes chapters covering the topics below:

2. [Sustainable Design and Construction](#)
3. [Renewable and Low Carbon Energy Schemes](#)

4. [Sustainable Transport](#)
5. [Green and Blue Infrastructure](#)
6. [Biodiversity](#)
7. [Mitigating Flood Risk](#)

East Suffolk Council has produced this guidance to support neighbourhood planning groups in addressing climate change challenges in their Neighbourhood Plan area through their approaches to policies, infrastructure priorities and community actions. The guidance includes advice, case studies, and links to further technical guidance.

This guidance can be referred to for either new or under-review Neighbourhood Plans. It should be noted that words occurring in the text that are shown in **bold** font are defined in the document's **Glossary**.

## 2. Sustainable Design and Construction

### Introduction

The construction of new buildings and the operation of buildings are major contributors towards greenhouse gas emissions. Improving building standards to reduce carbon emissions is a key step towards meeting the Government's 2050 Net Zero target.

'Sustainable development' is defined in the National Planning Policy Framework as development that is environmentally, economically and socially sustainable. Whilst all three elements are important, sustainable design and construction focuses on delivering the environmental element of sustainable development through construction methods, material choices, and technologies. Highly environmentally sustainable design and construction methods can deliver developments that:

- Have lower energy demand and use, which results in lower utility bills, and lower carbon emissions, and less pollution.
- Adapt the design and orientation of buildings to the location to utilise natural light, natural ventilation and prevent overheating in summer.
- Include onsite renewable energy generation, such as solar panels, and storage batteries
- Reusing existing soil and materials onsite, source building materials responsibly, use recycled building materials or use materials with a recycled content, and use renewable materials (e.g. FSC timber).
- Use materials that can be recycled when the building comes to the end of its life.

Neighbourhood Plans can help achieve sustainable development by setting planning policies relating to elements of sustainable design.

### The role of Building Regulations

Building Regulations are the legal minimum standards to which buildings must be designed and constructed. Building Regulations are set by central government and cannot be altered by Councils, Local Planning Authorities or Neighbourhood Plan Groups. They are enforced through site visits by Building Inspectors.

Building Regulations cover a wide range of topics including structure, fire safety, ventilation, water efficiency, drainage, the conservation of fuel and power, overheating, and many others. The Building Regulations are set out in a series of [Approved Documents](#) available to view online. The standards are intended to create safe, healthy, high-functioning buildings. Building Regulations apply to new buildings, extensions, conversions and to all forms of development including residential, commercial, retail, etc.



*Air Source Heat Pumps, Jubilee Court, Halesworth*

## The Future Homes and Future Building Standards

The Future Homes Standard was expected to introduce a new Part L of the Building Regulations (conservation of fuel and power) in [2025](#). A public consultation on the proposed standards is expected followed by publication of the final regulations, and a transition period prior to regulations coming into force. The [timescales](#) for this are unknown. These new higher standards will improve new residential buildings' energy efficiency and will reduce carbon emissions. The Future Homes Standard is a step towards meeting the Government's 2050 Net Zero target. The new Part L Building Regulations will address residential properties and is expected to:

- Ensure new homes produce 75-80% less carbon emissions than those built under the 2013 Building Regulation standard.
- Require higher levels of thermal insulation, including triple glazed windows and insulated external doors.
- Focus on creating well-sealed, airtight buildings that minimise heat loss, but also provide ventilation and good indoor air quality.
- Prevent the installation of fossil fuel (gas and oil) boilers for heating and hot water.
- Priorities low-carbon heating systems, with air sources heat pumps becoming standard for domestic heating and hot water.
- Use wastewater heat recovery systems.
- Incorporate renewable energy sources to reduce carbon emissions and reliance on fossil fuels, with solar roof panels becoming standard on homes where practically possible.



*Solar panels on the roof of a house (Stock image)*

The new Part O of the Building Regulations (2021) are intended to reduce the risk of buildings overheating, particularly in summer, as a result of solar gain and poor ventilation. These regulations:

- require consideration of the orientation and location of a building, and
- the relationship between window area and floor area, opening area of windows and assess the risk of overheating.

The Future Buildings Standard is expected to introduce new Part L Building Regulation standards for non-residential buildings; it will be introduced after the Future Homes Standard.

## Policy context

### National planning policy context

Building Regulations and planning policy impact new build development, extensions and conversions. The planning system cannot address the energy standards and carbon emissions from existing buildings.

## National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)

In the [National Planning Policy Framework](#) there is a strong focus on adapting to and mitigating climate change through consideration of flood risk, coastal change, and the use and supply of renewable and low carbon energy schemes (e.g. solar farms, wind farms and community-led initiatives). The NPPF does not directly address the issue of the planning system setting standards higher than Building Regulations.

The National [Planning Practice Guidance](#) has not been updated to reflect the introduction of new Building Regulations, the publication of new NPPFs or recent Ministerial Statements. The guidance supports the general principle of local planning authorities setting higher energy performance standard for buildings and offers no guidance in relation to Neighbourhood Plans.

### Can Planning set standards higher than Building Regulations?

Setting standards higher than Building Regulations is possible but extremely challenging. A few Local Planning Authorities have successfully introduced standards higher than building regulations, but this is not yet a widespread or standard approach. There are no known Neighbourhood Plans that have set standards higher than Building Regulations.

Government advice provided through a [Written Ministerial Statement in December 2023](#) addresses provisions for Local Plans to set standards higher than Building Regulations but does not provide provisions for Neighbourhood Plans. The Written Ministerial Statement notes that “any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned Building Regulations should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).”

The complexity and significant cost of gathering evidence to support policies that set standards higher than Building Regulations also is likely to be prohibitive for Neighbourhood Plan Groups. The setting of standards higher than Building Regulations is most effectively undertaken by Local Planning Authorities, where these can be considered comprehensively across a district and as part of plan-wide viability assessment.

However, depending on the ideas and aspirations of the local community, there is scope for Neighbourhood Plans to set higher expectations. Neighbourhood Plan policies could address expectations for **‘zero carbon ready’ buildings, Passivhaus standards, and whole life-cycle carbon emissions.**

Guidance on what Neighbourhood Plans can do and examples of community actions are provided below.



*Award winning Passive Housing development of 100% social housing, Goldsmith Street, Norwich*

## Local planning policy context

The key Local Plan policies for sustainable design and construction:

Suffolk Coastal Local Plan (2020)

- [Policy SCLP9.2 – Sustainable Construction](#)

Waveney Local Plan (2019)

- [Policy WLP8.28 – Sustainable Construction](#)

Both of these policies are strategic policies.

The local plans policies have sustainability requirements that apply to new developments of 11+ dwellings in the Suffolk Coastal area, 10+ dwellings in Waveney area, and some non-residential developments of 1,000sqm+ gross floorspace.

Policy SCLP9.2 requires a 20% reduction in CO<sub>2</sub> emissions below the Target CO<sub>2</sub> Emission Rate (TER) set out in the 2013 Part L Building Regulation standards. This requirement has been superseded by new Building Regulations. The other policy requirements relating to water efficiency and British Research Establishment Environmental Assessment Method (BREEAM) standards remain applicable to relevant planning applications.

Policy WLP8.28 requires developments to consider, where practical, a wide range of sustainability measures that could be incorporated into development. The applicant must submit a Sustainability Statement to demonstrate consideration of the issues.

Both policy SCLP9.2 and WLP8.28 set water efficiency standards of 110 litre per person per day for all new dwellings.

Both policy SCLP9.2 and WLP8.28 have requirements for certain non-residential developments to achieve the BREEAM 'Very Good' standard or equivalent.



*Award winning Passive Housing, Goldsmith Street, Norwich*

## Supplementary Planning Documents (SPDs)

East Suffolk Council has a [Sustainable Construction Supplementary Planning Document \(2022\)](#).

The SPD provides guidance on:

- water efficiency and management
- energy efficiency and carbon reduction
- materials
- waste
- siting, form and orientation
- sustainable energy and construction and the historic environment
- natural environment
- renewable and low carbon energy schemes

- construction methods, and
- healthy buildings and places.

## Suffolk County Council Guidance for Parking

Suffolk County Council has technical guidance on [Parking](#) which includes a chapter on EV (Electric Vehicle) Charging.

Suffolk Coastal Local Plan policy SCLP7.2 Parking Proposals and Standards expects proposals to have regard to the parking guidance excluding guidance related to ‘Residential Parking Design’ unless other local planning considerations indicate otherwise. Proposals should also accord with both the East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy, or Neighbourhood Plans for the area where applicable.

Waveney Local Plan policy WLP8.21 Sustainable Transport requires new developments to provide parking that meets the parking guidance.

[Suffolk Guidance for Parking](#) (2023) requirements are “each dwelling must have the ducting in place to allow a suitable wattage wall charging unit to be installed and connected to a suitable household consumer unit that has the capacity to charge an EV and run other household electrical appliances when required by the resident. Commercial developments must provide suitable charging systems for a number of parking spaces, with ducting and infrastructure in place to install additional charging systems when future demand dictates.” Neighbourhood Plans do not need to repeat guidance provided in the [Suffolk Guidance for Parking](#).

## What can Neighbourhood Plans do? ✓

Neighbourhood Plan Groups need to establish what the local community’s ideas and aspirations are in relation to sustainable design and construction. The group can investigate concerns and collect evidence to support the desired approach in the Neighbourhood Plan. A Neighbourhood Plan could define what the local community considers to be sustainable design and set out the local community’s aspirations.

Where communities are interested in the sustainability of new homes and buildings in their Neighbourhood Plan area, sustainable design and construction could form part of the plan’s vision for the area with an objective to support delivery of the highest possible standards.

Early discussions with East Suffolk Council are essential if a Neighbourhood Plan Group is seeking to set high expectations, so the practicalities and feasibility of proposals can be fully considered.

Neighbourhood Plan policies could:

- Apply some elements of Local Plan policies SCLP9.2 and WLP8.28 to ‘minor’ residential developments of 10 or less houses and commercial development schemes of 1,000sqm or less of floorspace.
- Set expectations for building design that utilises natural light, natural ventilation and prevents overheating.
- Set expectations for all new build developments, the conversion of existing buildings and building extensions to incorporate solar panels, where practical.
- Set expectations for onsite energy generation for local businesses through individual wind turbines and/or ground solar panels.
- Set expectations for onsite energy generation for community building and projects through individual wind turbines and/or ground solar panels.
- Set expectations for water efficiency measures such as water efficient sanitaryware, water butts, grey water, rainwater harvesting and sustainable drainage schemes.
- Set expectations for non-residential development of 1,000sqm gross floor area or more to meet BREEAM ‘excellent’ standards for water consumption.
- Set expectations for developments to be ‘zero carbon ready’ through designs that minimise energy needed to heat and cool the building.
- Set expectations for developments to include landscape schemes that help alleviate some of the effects of climate changes, such as providing street trees to improve the microclimate, using permeable surfaces to reduce surface water run-off, etc.
- Where feasible, incentivise buildings to be certified to [Passivhaus](#) or equivalent standards. Incentivise meeting the standard by recognising that Passivhaus building forms, plot sizes, plot coverage and layouts are likely to be different to the existing character of the area. Consider giving weight to achieving higher energy efficiency standards in the planning balance, providing the scheme does not significantly harm the character of the area.
- Where feasible, set expectations for new and refurbished buildings, that aren’t Passivhaus or equivalent standard, to have Planning Conditions requiring the submission of Post Occupancy Evaluation Reports that demonstrate the building is performing as predicted, and where necessary for corrective action to be taken.

- Set expectations for planning applications to submit Whole Life-Cycle Carbon Emission Assessment to demonstrate embodied carbon has been reduced where possible.
- Set expectations for planning applications to submit Energy Statements that demonstrate opportunities were taken to reduce energy use where possible in accordance with the energy hierarchy.
- Neighbourhood Plan Groups could work with landowners to allocate land for a car park or require a car park is provided through a housing allocation. See the Waveney Local Plan [policy WLP7.14](#) that allocates land in Ringsfield as an example.
- Neighbourhood Plans could set expectations for higher levels of EV charging points that those set out in the Suffolk Guidance for Parking.
- Neighbourhood plans could encourage the installation of the charging points, not just the ducting and infrastructure.



*East Suffolk House, Melton. Electric Vehicle Charging*

## Community actions

Depending on the aspirations of the local community and the vision for the Neighbourhood Plan, there are community actions that could be taken to improve existing buildings.

According to the Government, in 2022 emissions from residential buildings accounted for a fifth (20%) of greenhouse gas emissions in the UK ([Housing and net zero](#)). Finding ways to reduce greenhouse gas emissions from existing homes is a serious challenge. Most of the UK's housing stock is comprised of older homes with energy and insulation standards well below current Building Regulations. Poor levels of insulation can result, not just in higher greenhouse gas emission, but in higher energy bills and colder homes that impact people's health. Examples of community actions local communities could commit to are:

- Raising awareness in the community of the [Warm Homes Suffolk](#) project. It provides some households with access to free home improvements to make them warmer, healthier and cheaper to run.
- Raising awareness of the support available for [fuel, energy and utilities](#) including the [Surviving Winter Scheme](#) that can help those who are in fuel poverty and [interest-free loans for heating oil](#).
- Installing EV charging points in car parks owned by the Town/Parish Council.
- Engaging with consultations on the Future Homes Standard and Future Building Standard if/when they are held.

## Case studies

### East Suffolk Neighbourhood Plan policies:

- Wickham Market Neighbourhood Plan (2023) [Policy WICK5: Designing for renewable energy and carbon reduction](#) notes what housing development should achieve including water efficiency, optimising layout and design, and on-plot charging facilities.

### Other Neighbourhood Plan policies:

- The Thame Neighbourhood Plan (submission version April 2024) [Policy CPQ5: Sustainable Design and Construction](#) will support new developments being delivered that are 'Future Home Standard' ready and make optimal use of land through good design.
- The Capel Neighbourhood Plan (2024) [Policy C3: Meeting the highest environmental standards](#) seeks development that meets the highest environmental standards and sets out the design principles that will be supported.

- The Houghton Regis Neighbourhood Plan (2024) [Policy H2: Sustainable Development](#) focuses on optimising energy efficiency and includes requirements for retrofitting existing buildings where they require planning permission.
- Broadclyst Parish Council Neighbourhood Development Plan (2023) [Policy DC1 Energy Efficient New Buildings and Policy DC2 Increasing Energy Efficiency of Existing Buildings](#). The two policies support a fabric first approach in new buildings, and energy efficiency and use of renewable energy when refurbishing existing buildings.
- The Ongar Neighbourhood Plan (2022) [Policy ONG-ED4: Sustainable Design](#) sets out the criteria and features for well-designed and sustainable development which will be supported.
- The Ivers Neighbourhood Plan (2022) [Policy IV14 Passivhaus Buildings](#) sets out five elements intended to deliver improvements in buildings energy performance. The policy seeks to incentivise Passivhaus or equivalent standards by recognising that Passivhaus building forms, plot sizes, plot coverage and layouts are likely to be different to the existing character of the area. The policy gives weight to achieving higher energy efficiency standards in the planning balance, providing the scheme does not significantly harm the character of the area. The policy also requires post-occupancy reports for new and refurbished buildings to ensure standards delivered as predicted, unless the applicant is using Passivhaus or equivalent standards.

## Key resources

- The East Suffolk [Greenprint Forum](#) is a voluntary network facilitated by the Council which works to progress environmental issues in East Suffolk, open to anyone who wishes to join. Anyone, from the community, business, or public sectors, and individuals, can join for free and be involved in informing and learning from the group.
- [The Green Suffolk website](#), which provides information on lowering greenhouse gas emissions at home, work, schools and more through community projects.
- [Net Zero Carbon Toolkit](#) (2021) by Levitt Bernstein, Elementa, Passivhaus Trust and Etude commissioned by West Oxfordshire, Cotswold and Forest of Dean District Councils, funded by the LGA Housing Advisers Programme.
- [Leti Climate Emergency Design Guide](#) (2020) by the London Energy Transformation Initiative provide advice and guidance designing buildings in the context of a climate emergency and is working with professionals towards achieving net zero carbon development
- [Solar together with Suffolk](#) County Council is a group buying scheme individual wanting to install solar panels on their home.
- [Solar PV and Building Regulations in Conservation Areas](#) is guidance by East Suffolk Council to support homeowners in conservation areas.

## 3. Renewable and Low Carbon Energy Schemes

### Introduction

This chapter will focus on how Neighbourhood Plans can support the delivery of standalone renewable and low carbon energy schemes that produce energy on a larger scale.

The **Sustainable Design and Construction** chapter of this guide covers how Neighbourhood Plans can encourage and support the incorporation of renewable and low carbon energy technologies into homes.



*Large scale solar array development (Stock image)*

### What is ‘Renewable and Low Carbon Energy’?

Renewable and low carbon energy is energy which is derived from natural resources which emit minimal to no pollutants into the Earth’s atmosphere and will not run out. Sun, wind, water and waste are some of the sources of renewable energy which are available and can be incorporated into development. These can range from installing solar panels on roofs or as standalone schemes to produce energy on a larger scale.

Renewable and low carbon energy schemes are most commonly delivered in the form of solar/wind farms but can also include nuclear, biomass and hydropower amongst other sources.

Under the Town and Country Planning Act 1990, East Suffolk Council will determine applications for onshore energy schemes with a capacity of up to 50MW. Any onshore scheme with a capacity of 50MW or over is considered a Nationally Significant Infrastructure Project (NSIP) and applications for these will be determined by the Secretary of State. The government intends to increase the threshold for NSIPs from 50MW to 100MW for onshore wind and solar farms.

Neighbourhood Plans can contribute significantly to minimising climate change by encouraging and supporting renewable and low carbon energy schemes at a local level. Communities can consider what the energy need in the area is and where the opportunities are.



*Onshore development of wind turbines (Photo by [musicFactory lehmannsoud](#) on Pexels)*

## Policy context

### National planning policy context

#### The National Planning Policy Framework (NPPF)

Neighbourhood Plans must have regard to the NPPF, which states that:

‘The planning system should support the transition to net zero by 2050 and take full account of all climate change impacts...It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions... and support renewable and low carbon energy and associated infrastructure’ (paragraph 161 of 2024 NPPF).

The NPPF also requires local planning authorities to “recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions” (paragraph 168 b) of 2024 NPPF)

[The National Planning Practice Guidance](#) on renewable and low carbon energy identifies planning considerations when developing policies for renewable and low carbon energy.

### Local planning policy context

Neighbourhood Plans should be in conformity with the strategic policies of the adopted Local Plans.; the relevant policies are:

#### Suffolk Local Plan (2020)

- [SCLP 9.1 - Low Carbon and Renewable Energy](#)
- [SCLP10.4 - Landscape Character](#)
- [SCLP11.1 - Design Quality](#)

#### Waveney Local Plan (2019)

- [WLP8.27 - Renewable and Low Carbon Energy](#)
- [WLP8.29 - Design](#)
- [WLP8.35 - Landscape Character](#)

All of the key policies for renewable and low carbon energy schemes are strategic policies.



*Solar Farm (Stock image)*

## Nationally Significant Infrastructure Projects (NSIPs)

Renewable onshore energy schemes with an installed capacity of 50MW or greater are classed as Nationally Significant Infrastructure Projects (NSIPs) and these applications are determined by the Secretary of State. NSIPs are covered by the Planning Act 2008 and are usually large-scale onshore projects of national importance, such as Sizewell C in East Suffolk.

As previously mentioned, East Suffolk Council only determines applications below the 50MW threshold under the Town and Country Planning Act 1990. The government intends to increase the threshold for NSIPs from 50MW to 100MW for onshore wind and solar farms.

A Neighbourhood Plan cannot determine or control the development of NSIP applications, but town and parish councils are statutory consultees and members of the public can also participate at various stages of the application process by asking questions, attending meetings and responding to consultations.

- Government guidance on the NSIP process  
[The stages of the NSIP process and how you can have your say](#)
- Suffolk County Council guidance on NSIPs  
[Suffolk County Council- Advice for Town and Parish Councils on NSIPs](#)
- East Suffolk Council guidance on NSIPs  
[National infrastructure and energy projects](#)

## What can Neighbourhood Plans do? ✓

Neighbourhood Plan Groups need to establish what the local community's ideas and aspirations are in relation to renewable and low carbon energy. The group can investigate concerns and collect evidence to support the desired approach to the Neighbourhood Plan.

Neighbourhood Plans have a range of methods to consider when deciding how to support renewable and low carbon energy standalone schemes into their plan. These may include any or all of the following:

### The Neighbourhood Plan's Vision and Objectives

A Neighbourhood Plan can set out a positive strategy in the vision and/or objectives of the plan to address climate change by supporting/delivering energy schemes in the area.

### The Neighbourhood Plan's Policies

**Supporting policies** – Neighbourhood Plans can include policies which support renewable energy schemes in their neighbourhood area, subject to them meeting specific criteria. Policy criteria may require for example, that a scheme does not cause significant adverse impact on the landscape or use valuable agricultural land.

**Policies identifying suitable areas** – Neighbourhood Plans can take a proactive approach and include policies which identifying suitable areas for renewable energy schemes within their plan area. There is not a set process for this, but steps might include identifying the local need, identifying suitable land (call for sites), and considering connectivity to the grid. Neighbourhood Plan Groups should liaise with the East Suffolk Council Energy Team and Planning Policy Teams when identifying suitable areas.

**Mitigating Policies** – Neighbourhood Plans can include policies to mitigate the impact of renewable energy schemes by requiring landscaping in the immediate surrounding area. This may require that developers provide planting to enrich biodiversity and provide habitats. It could also include the requirement to produce a planting strategy.

**Other policies** – Neighbourhood Plans can include policies which identify specific important views, trees, or hedgerows of local value in their area which they wish to protect. Policies can explain that development will not be supported if it negatively impacts specific views, trees, or hedgerows.

Neighbourhood Plans can also set out what community benefit projects they would like to see funded if a NSIP was planned in their area. This could include funding for new, or improvements to existing, community infrastructure, or funding for community action projects. Projects that relate most directly to the likely impacts on the community of the NSIP are most likely to be successful in securing community mitigation funding. Listing specific projects in a made Neighbourhood Plan helps to give the listed projects more weight when negotiating with NSIP developers. Examples of grants that have been awarded to community benefit projects to date through the Sizewell C Community Fund can be viewed at:

<https://www.suffolkcf.org.uk/sizewell-c/grants-awarded/>.

## Case studies

Examples of existing Neighbourhood Plan policies which relate to renewable and low carbon energy schemes:

### East Suffolk Council examples

- Oulton Neighbourhood Plan (2023) [Policy 6: Protection of Important Local Views](#) – explains that development which adversely affects specific views will not be supported.
- Rushmere St Andrew Neighbourhood Plan (2023) [Policy RSA-4: Protection of Trees, Hedgerows and Other Natural Features](#) states that development should avoid substantial loss or harm of trees, hedgerows or other natural features and sets out mitigation requirements where this cannot be avoided.

## National examples

- Egloshayle, St Breock and Wadebridge Neighbourhood Plan (Draft)
  - [Policy RE03 Wind Turbines](#) - This policy supports wind farms providing criteria is met.
  - [Policy RE05: Community Energy Projects](#) – This policy supports community energy schemes providing criteria is met and sets out the percentage of community ownership required.
- Broadclyst Neighbourhood Plan (2022) [Policy DC6 Community Led Renewable Energy Production](#) – this policy supports community energy schemes providing criteria is met.
- Bude Stratton Neighbourhood Plan (2016) [Policy 14 Renewable Energy](#) – this policy supports community energy schemes (except wind turbines) providing criteria is met.
- Gwinear-Gwithian Neighbourhood Plan (2016) [Policy 12a: Policy on Wind Turbines](#) - This policy identifies suitable locations for wind turbines providing criteria is met.
- Hough on the Hill Neighbourhood Plan (2014) [Policy HoH13 Community-Led Initiatives for Renewable and Low Carbon Energy](#) - This policy supports community energy schemes providing criteria is met.

## Community energy schemes

Neighbourhood Plans can support the creation of community energy schemes which can involve ‘generating, using, owning and saving energy.’<sup>5</sup>

Community energy schemes are community-led energy projects which can be wholly or partially owned and/or controlled by the community. Communities can develop/fund these projects on their own or they may choose to partner with organisations such as local authorities and energy companies to assist with developing and/or funding their projects.

‘A community energy project can happen anywhere, from remote villages to city neighbourhoods. And it can involve anything from installing a wind turbine to running an awareness campaign about energy efficiency.’<sup>6</sup>

Collectively, such schemes can contribute significantly to reducing carbon emissions but also provide direct benefits for the community itself such as reducing energy bills, attracting investment, creating jobs and potentially generating an income which can be reinvested into the community.

Neighbourhood Plans can set out the criteria required for a community energy scheme to be supported. This may include the location of the scheme, the type/capacity of energy, or a

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<sup>5</sup> [Definition, impact and sector potential | Community Energy England](#)

<sup>6</sup> [How you can help your community - Energy Saving Trust](#)

desired percentage of community ownership, a good example of which can be found in the [Egloshayle, St Breock and Wadebridge Draft Neighbourhood Plan](#).

## Community actions

‘Community actions’ are non-planning actions for the community, specific task groups or the Town/Parish Council to undertake which can be formalised as a commitment through inclusion in the Neighbourhood Plan. In relation to renewable and low carbon energy, community actions could look like-

- Setting up a voluntary group to draft responses to energy schemes determined by the Council as well as NSIPs.
- Nominate a community energy champion- A volunteer who could provide a point of contact for the community in relation energy development.

## Key resources

### Community energy schemes

- Cornwall Council’s useful neighbourhood planning guide on energy efficiency and renewable energy- [Energy efficiency and renewable energy; a community-led approach](#)
- The Centre for Sustainable Energy have created guidance explaining how Neighbourhood Plans can respond to climate change [neighbourhood planning in a Climate Emergency](#).
- Impact is an online tool which can calculate the carbon footprint of an area, results can then be compared to those of other regions [Community carbon calculator tool](#)
- The Carbon and Place app can calculate the carbon footprint of an area [Place based carbon calculator tool](#)
- Community Energy England provide useful resources for community energy schemes, including:
  - [What is community energy?](#)
  - [What is community energy? \(Video\)](#)
  - [National Grid- Net Zero Community Guide](#)

### Nationally Significant Infrastructure Projects (NSIPs)

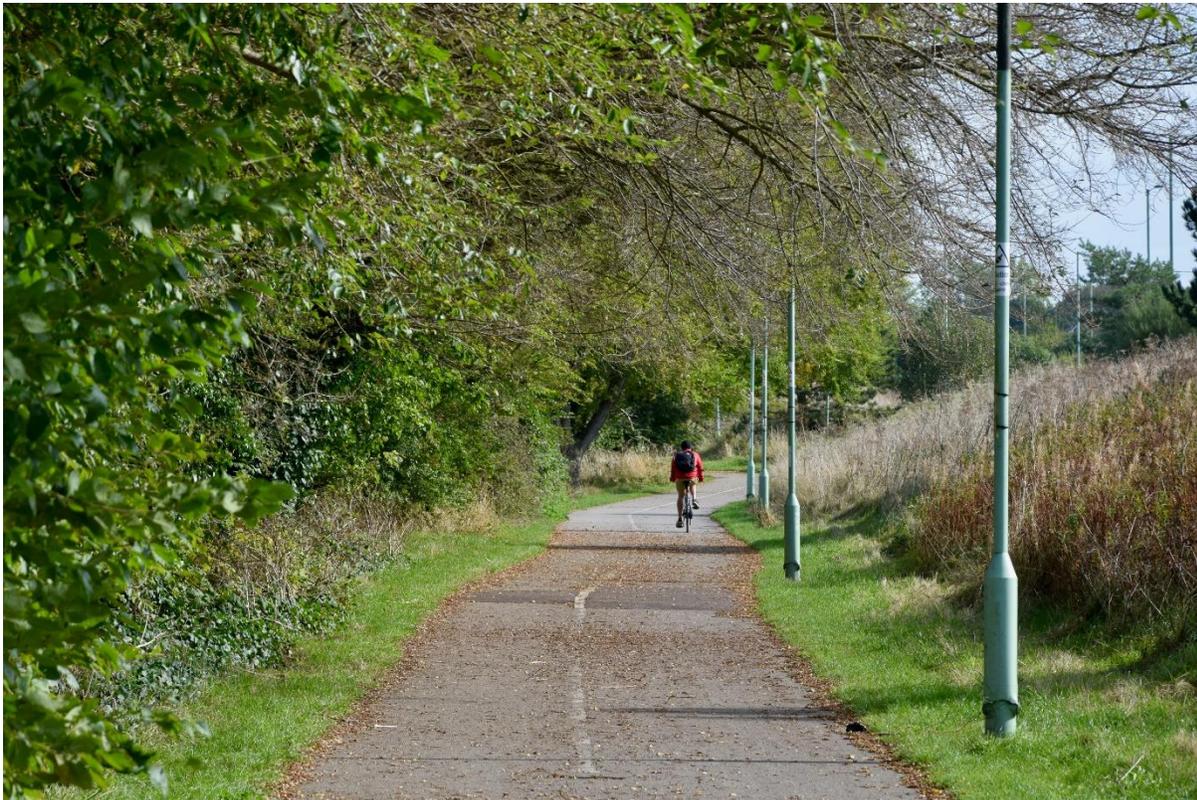
- East Suffolk Council - [National infrastructure and energy projects](#)
- Suffolk County Council - [Major infrastructure projects including NSIPs](#)
- Government Guidance - [The stages of the NSIP process and how you can have your say](#)

## 4. Sustainable Transport

### Introduction

Transportation modes that use finite resources, such as those that are fuelled by petroleum products or that require lithium for batteries, are unsustainable over the longer term. Use of petroleum perpetuates the carbon dioxide (CO<sub>2</sub>) emissions that are significant drivers of climate change caused by human activities, as well as creating pollution that is harmful to health and environments.

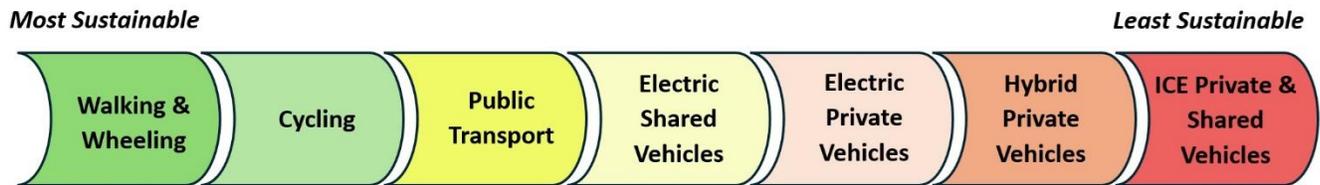
Enabling people to travel via more sustainable modes of transport is therefore an important policy area for Local Plans and Neighbourhood Plans to consider as part of an overall strategy to address climate change.



*Shared use path, Carlton Colville – an example of a **green route**.*

## What are the more sustainable modes of transport?

The sustainability of different transport mode options generally follows:



## Policy context

### National planning policy context

The National Planning Policy Framework (NPPF) acknowledges and promotes the centrality of sustainable transport for increasing localities' climate change resilience.

Paragraph 161 (in Chapter 14 'meeting the challenge of climate change, flooding and coastal change') states that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability, and improve resilience.

Paragraph 109 (in Chapter 9 'promoting sustainable transport') states that transport issues should be considered from the earliest stages of plan-making (which includes the making of Neighbourhood Plans), using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. The requirement for a vision-led approach requires plan-makers to take a more strategic 'whole-area' approach, which in a Neighbourhood Plan context could mean looking at the delivery of the most important active travel infrastructure for the Neighbourhood Plan area as a whole, particularly in response to planned growth, and where relevant, the provision/improvement of bus shelters to encourage more use of public transport. This is so that (inter alia) opportunities to promote walking, cycling and public transport use are identified and pursued.

More directly, paragraph 103 (in Chapter 8 'promoting healthy and safe communities') notes that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities, and can deliver wider benefits for nature and support efforts to address climate change.

### Local planning policy context

The following policies from the two East Suffolk Council Local Plans are most relevant for Neighbourhood Plans looking to address climate change through active travel infrastructure:

#### Suffolk Coastal Local Plan (2020)

- [Policy SCLP7.1 Sustainable Transport](#)

- [Policy SCLP7.2 Parking Proposals and Standards](#)
- [Policy SCLP8.2 Open Space](#)
- [Policy SCLP11.1 Design Quality](#)

Waveney Local Plan (2019)

- [Policy WLP8.21 Sustainable Transport](#)
- [Policy WLP8.29 Design](#)
- [Policy WLP8.30 Design of Open Spaces](#)
- [Policy WLP8.31 Lifetime Design](#)

It should be noted that all of these policies are strategic policies.

In addition to this, the [East Suffolk Cycling and Walking Strategy \(2022\)](#) contains recommendations for new and improved cycling and walking routes in key areas of the district, which Neighbourhood Plans are encouraged to support and embed into Neighbourhood Plan policy related to sustainable transport. [Suffolk County Council have also produced a Suffolk Local Cycling and Walking Infrastructure Plan \(2024\)](#) that covers all of Suffolk, and therefore may also include details of improvements intended for locations (see 'Network Map') that may fall within Neighbourhood Plan areas. For Neighbourhood Plans related to major settlements in East Suffolk, Suffolk County Council's 'Area Plan' for that settlement area is set out in the Local Transport Plan 2025-2040; the Area Plans provide area-specific guidance for sustainable transport measures.

Suffolk County Council's [Suffolk Design: Streets Guide \(2022\)](#) is also recommended to be referred to for Neighbourhood Plans looking at strategic overall movement network design and the creation of healthier, more active-travel-friendly streets in their areas.

Suffolk County Council's [Suffolk Green Access Strategy \(Rights of Way Improvement Plan\) \(2020\)](#) covers how the rights of way and access network is intended to be managed, maintained and improved to meet the needs of all users in Suffolk over the period of 2020-2030.



*Wayfinding signage, Oulton Broad*

## What are the relevant considerations for increasing use of sustainable modes of transport?

In order to encourage communities to use more sustainable modes of transport, they must be provided with feasible alternative modes. Directly improving public transport provision will usually be outside of the scope of a Neighbourhood Plan. At county level, public transport is challenging to improve in many areas of Suffolk due to low densities making new or improved services unviable. When assessing how feasible alternatives are, people will consider matters such as:

- **Convenience** (the distance, directness, how continuous the infrastructure/service is between where they're starting and where they're going is, the topography – are there challenging hill climbs on a route, connectivity to other transport modes, whether they can 'trip chain'<sup>7</sup>, and the impact these matters have on travel times compared with other feasible transport modes for the trip),

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<sup>7</sup> 'Trip chains' are where people make multiple stops before returning to where they started – this can be in a single round trip or over the course of a day. An example of a trip chain could include: (start) home > children's school > workplace > children's school > shops > home (end).

- **Accessibility, comfort and safety** (the condition and suitability of the surfacing for their trip, the available space, whether there is adequate lighting and overlooking, and how safe it feels to be in that space at different times of the day),
- **Security** (e.g. can a scooter or cycle be securely parked there),
- **Sociability** whether the mode/quality of the infrastructure enables social interaction during a trip (e.g. children may be more inclined to walk, wheel or cycle to school if their friends are enabled to, too),
- **Affordability** (cost of a journey; cost of a journey by one mode compared to another),
- **Overall attractiveness of the environment** through which they will travel (together with safety considerations, a more visually appealing environment that supports an enjoyable travel experience may influence behaviour – people may be willing to take a longer route for some of their journeys if it is more attractive and enjoyable than a shorter alternative route), and so on.

The key principles and specifications for designing high-quality, inclusive active travel infrastructure is covered in more detail in the ‘Active Travel’ chapter of the [Healthy Environments Supplementary Planning Document](#) (2024).

### What is ‘active travel infrastructure’?

‘Active travel’ is travel by walking, wheeling (e.g. using a wheelchair) or cycling<sup>8</sup>, rather than via a vehicle with a motor, such as a car, bus or moped; ‘active travel’ can be thought of as ‘people-powered’ forms of travel, though also includes electric cycles, which provide cyclists with power assistance.

Active travel is often the natural choice for shorter journeys (e.g. a 20 minute round trip), unless there are factors reducing the appeal or accessibility of travelling more actively. Therefore, the key opportunity for improving the sustainability of transport through Neighbourhood Plan policies is to better enable active travel through new and improved ‘active travel infrastructure’ for the community.

‘Active travel infrastructure’ enables people to walk, wheel and cycle between key origins and destinations (e.g. homes and schools, workplaces, shops, train station, etc.) it includes:

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<sup>8</sup> A more detailed definition of ‘active travel’ can be found in the ‘Active Travel’ chapter of the Healthy Environments Supplementary Planning Document (2024).

- **Walking, wheeling and/or cycling routes:** that are of appropriate width and surface treatment for the mode(s) and types of journey (i.e. commuting or leisure), and the anticipated number of active travel trips per day that it's intended for;
- **Cycle and scooter parking and/or storage:** both in homes and destinations, to ensure cycles and scooters are able to be securely and conveniently parked/stored in places where people live or travel to, and;
- **Seating:** to provide users with an opportunity to rest while travelling – ideally provided at regular intervals along routes to enable people with reduced mobility to increase their activity.

## What can Neighbourhood Plans do? ✓

Neighbourhood planning groups need to establish what the local community's aspirations and ideas are in relation to sustainable travel. The group can investigate concerns, identify what the local needs are and collect evidence to support the desired approach to the Neighbourhood Plan. The evidence base could include details of existing facilities and networks. Sources of information include the East Suffolk Council Local Plans, East Suffolk Council's Rights of Way team, Suffolk County Council's Highways team, and the [East Suffolk Cycling and Walking Strategy](#).

Neighbourhood Plans can:

- Include an **active travel infrastructure policy** which:
  - **Specifies the locations of existing infrastructure that needs improvement:** such as existing Public Rights of Way routes, pavements, cycle paths, existing benches, existing cycle parking, etc. Improvements could also include the upgrading of footpaths to bridleways to legally enable cycling, and the necessary widening, surfacing and signage needed to make cycling safe, attractive and accessible along that route. Consideration should be given, in relevant locations, to the impact this could have on equestrians; early consultation activities will likely help to identify any issues of this nature, though some specific outreach activities may be necessary.
  - **Specifies the locations of new infrastructure the community wants to be delivered:** either directly via build out of a site allocation, or through infrastructure funding spending. The location of desired new routes should be made clear in terms of where they should originate from and where they should end, and any key locations they should travel via. Ideally this would be shown on a supporting map, rather than

described in the text, as this is likely to be clearer. Active travel policies can also include direct reference to recommendations set out in the East Suffolk Cycling & Walking Strategy (2022), if recommendations exist within the designated Neighbourhood Plan area<sup>9</sup>. Direct references can be included either in site allocation policies, a high-level active travel policy, and/or itemised in the Infrastructure Priority List.

There may be instances where a community wants to directly fund and deliver new infrastructure. This could arise in situations such as where the community wants to create a new active travel route between two key locations, but this is not able to be delivered as an integral part of development. In such circumstances the new route would likely need to be delivered as a new Public Right of Way (PRoW), having been funded through CIL or other appropriate funding. Where a new route would be entirely over land owned by the Town/Parish Council, the public could be given access to it without the need for a formal agreement. Where the route would be over land not owned by the Town/Parish Council, the landowner would need to agree to a 'public path creation agreement' with Suffolk County Council's PRoW team. Other options may include more informal agreements with landowners, though this would not incur the same legal protection as a Public Right of Way route. Neighbourhood Plan policies could safeguard land for new pedestrian or cycle infrastructure.

- **Sets out design quality expectations:** sets the minimum design quality and specification expectations for active travel infrastructure in the area. Rather than re-creating this content or risking contradictory guidance, neighbourhood planning groups are recommended to make direct reference in their policy to the design and specification guidance set out in the 'Active Travel' chapter of the [Healthy Environments Supplementary Planning Document](#) (2024). The policy could also include a requirement for adequate secure cycle parking storage space for new buildings or key spaces in the Neighbourhood Plan area. This could apply to residential or non-residential development; non-residential development could also be required to include showers and changing areas to better enable people coming to work via active modes.
- **Include an Infrastructure Priority List:** Neighbourhood Plans can be used to rank the community's desired active travel infrastructure projects in order of priority for delivery. This

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<sup>9</sup> It should be noted that the East Suffolk Cycling & Walking Strategy (2022) did not include recommendations for all areas of the district. Neighbourhood planning groups are recommended to check the Strategy's overall Recommendations Map if they are unsure whether any of its recommendations relate to their area.

will help to ensure the community's Community Infrastructure Levy receipt spending is directed to the projects that are most supported by the community, most urgent, and/or most likely to be deliverable during the plan period.

Together with CIL spending on new or improved routes and cycle/scooter parking, Town and Parish Councils also have the power to provide and improve bus shelters and roadside seating (e.g. benches), subject to agreement with Suffolk County Council's Highways team. This may help to support greater use of public transport, particularly in rural areas. A strategic approach is recommended to ensure that the limited funds available for improvements to active travel infrastructure/bus shelters etc. are able to be spent on projects that will be the most beneficial to, and have been identified as most important to, the community.

- **Identify related community actions** – such as voluntary community projects to improve the environment to encourage more active travel which do not require or are not eligible for neighbourhood CIL spend (e.g. maintenance works to existing trees, regular litter picking, etc.). Town and Parish Councils may also wish to gather information on how to increase local use of public transport services, by surveying local people on what their barriers may be to higher usage (e.g. lack of bus shelters, lack of cycle parking at the train station, infrequent services, etc.), which could not only inform the Infrastructure Priority List but may also be of value to public transport service providers.

## What can't Neighbourhood Plans do? ✖

Neighbourhood Plans cannot directly designate local eligible roads as 'Quiet Lanes'. Quiet Lanes are intended to encourage vehicle drivers to drive slowly along them to support safer active travel. Designated Quiet Lanes are typically single-track, have no road markings, and have fewer than 1,000 vehicles using them per day. Designation is undertaken by Suffolk County Council's Suffolk Highways team following a local nomination and a successful eligibility assessment. Whilst Neighbourhood Plans cannot directly designate Quiet Lanes, a community action can be identified for the Town/Parish Council to nominate potential roads to Suffolk County Council for potential future designation.

## Case studies

- Saxmundham Neighbourhood plan (2023) – [Policy SAX5: Improving connectivity](#). This policy states that new developments should maximise walking and cycling through its location and design, that new active travel infrastructure should be delivered to high design standards, that new routes should create and connect to a cohesive network and

to key destinations (schools, town centre, library, the river, etc.), supports green corridor connections to and from the town and neighbouring villages, and identifies specific links or improvements the community would like to achieve (supported by a figure that maps the routes).

- Easton Neighbourhood Plan (2024) – [Policy ETN10 – Design considerations](#) includes the requirement for schemes to ensure “safe walking and cycling routes are included and should ensure they are safe for residents of all ages and those that have mobility issues or are otherwise vulnerable”.
- Halesworth Neighbourhood Plan (2023) – [Policy HAL.TM1: Key Movement Routes](#) – this policy adds local detail by identifying ‘key movement routes’, and specifying that new active travel routes that are segregated (from motorised vehicles) will be ‘strongly supported’. In particular, it also requires routes within schemes should be safe and continuous and should connect to the Key Movement Routes, where practicable.



*Woodland path, Kesgrave*

## Key resources:

- [Healthy Environments Supplementary Planning Document \(Active travel chapter\) \(2024\)](#)
- [East Suffolk Cycling & Walking Strategy \(2022\)](#)
- [Suffolk Design: Streets Guide \(2022\)](#)
- [Department for Transport – Local Transport Note 1/20 – Cycle Infrastructure Design \(2020\)](#)
- [Department for Transport – Inclusive Mobility \(2021\)](#)
- [Suffolk County Council – Air Quality Strategy & Action Plan \(2023\)](#)

## 5. Green and Blue Infrastructure

### Introduction

The adequate provision, protection and stewardship of green infrastructure is vital in building communities' resilience to climate change. The quality and quantity of available green and blue infrastructure impacts matters such as flood risk, water quality, food security, heat and storm resilience, biodiversity, community health and wellbeing, and the amenity value of the local environment.

This section of the guide principally covers how green and blue infrastructure policies can support the resilience of communities' people and spaces, whilst the following section, [Biodiversity](#), focuses in on supporting the resilience of nature.

### What is 'green infrastructure'?

Green infrastructure, is a range of spaces and assets that provide environmental and wider benefits, including parks, playing fields, open spaces, woodland, allotments, private gardens, and can include sustainable drainage features, green roofs and walls, and street trees.

Green and blue infrastructure is made up of individual parcels of natural space and features that, when connected, provide environmental benefits and quality of life for communities.

The National Planning Policy Framework (NPPF) defines 'green infrastructure' as 'a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity'. Within this definition of 'green infrastructure' sits the NPPF's broad definition of 'open space' as being 'all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity'.

Whilst all types of green infrastructure are beneficial for climate change resilience, not all green infrastructure is publicly accessible, or can be protected for recreational or biodiversity purposes through planning. Public access to privately owned land is limited to terms set out by the landowner (e.g. National Trust sites) and/or in public access agreements with the public authority (e.g. Public Rights of Way). Community access to green infrastructure is most likely to be retained in perpetuity through either public ownership (e.g. the Parish Council own the land) or through planning control over green infrastructure provided for new developments through planning obligations and conditions.



*Covehithe*

## What is ‘blue infrastructure’?

‘Blue infrastructure’ includes water features such as ponds, lakes, streams, rivers, canals, wetlands, and storm water provision swales and raingardens. The ‘Natural Environment’ section of the National Planning Practice Guidance (PPG) defines blue infrastructure as a sub-type of green infrastructure.

## How does green and blue infrastructure build resilience to climate change?

The key means through which green and blue infrastructure can support resilience to climate change impacts are through:

- **Reducing flood risk** (see also the [Mitigating Flood Risk](#) chapter): blue and green infrastructure help to slow and store surface water run-off whilst also cleaning it,

mimicking natural water cycles. This works by:

- **Slowing surface water flow:** unsurfaced ground and man-made features such as rain gardens, green roofs, and permeable pavements help to slow and therefore manage the surface water run-off water. This reduces pressure on existing stormwater systems which can result in combined sewer overflows.
  - **Storing water:** features like ponds, wetlands, and detention basins (particularly retention basins) retain surface water runoff.
  - **Mimics natural water cycles and improves water quality:** natural processes like infiltration, evaporation, and storage reduce surface water run-off whilst also improving water quality by reducing contaminants and sediment.
- **Sequestering carbon** – trees and plants absorb carbon dioxide from the atmosphere and deposit it in the soil.
  - **Reducing heat and vulnerability to storm impacts:** the risk of exposure to excess heat can be addressed through trees and perennial plantings that provide shade and enclosure, which creates cooler and calmer microclimates. It reduces the overall area that is hard surfaced which typically absorbs and retains more heat and retains it for longer than natural surfaces).
  - **Food security and diversity:** providing spaces for local food production will help to give communities a more secure food supply. Key spaces for local food production include domestic gardens, allotments, community gardens, community orchards/food forests, and the incorporation of edible perennials (e.g. fruit trees) into green open spaces, etc.
  - **Supporting plants and wildlife populations and biodiversity** (see **Biodiversity** section): Providing more/enhanced habitat for plant and wildlife, which are likely to be under pressure to move or adapt to survive as a result of climate change impacts.
  - **Increasing access to nature:** The impacts of climate change are likely to affect mental health and wellbeing, which can be supported by better access to natural spaces to relax and recreate in. More substantive green infrastructure, i.e. larger green open spaces, help to provide healthy, accessible spaces for the community to meet socially, supporting social and mental health.

The physical, mental and social health of individuals and communities is best supported when green infrastructure is accessible within walking distance of key buildings (homes, schools and

workplaces), and is available in an adequate quantity and quality, and in a variety of types (varying in nature-density and intended function, e.g. food growing, sports, relaxation). Healthy individuals support healthy, interconnected communities that are more resilient and able to share resources and social capital to tackle shared challenges. Good quality, accessible green infrastructure supports non-car travel helping to reduce carbon emissions and mitigate the impact of climate change.



*River Waveney, Bungay*

## Policy context

### National planning policy context

The key national guidance documents for green infrastructure delivered through Neighbourhood Plans for supporting climate change resilience are:

#### National Planning Policy Framework (NPPF):

- **Promoting healthy and safe communities** – the NPPF states that planning policies should aim to achieve healthy, inclusive and safe places through (inter alia) providing safe and accessible green infrastructure and improving access to healthier food, including through allotments provision. Neighbourhood Plans can include policies, infrastructure priorities and

community actions to support delivery in this area. It also directly notes that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change (para 136).

- **Local Green Space designations** – the NPPF allows communities to identify and protect existing green areas of particular importance to them that pass the three value tests set out in the NPPF relating to proximity, community value, character and extent.
- **Design policies, guidance and codes** – the NPPF encourages neighbourhood planning groups to include design policies, guidance and codes, which (inter alia) could cover landscaping requirements for different areas within the neighbourhood area as a whole, specific areas within the neighbourhood area (e.g. town centre area), and/or site allocations.

Natural England’s ‘Process Journey for neighbourhood planning Groups: Incorporating Green Infrastructure into Neighbourhood Plans using the Green Infrastructure Framework – Principles and Standards for England’ guidance. This guidance can be used by Neighbourhood Plans looking to include policies that relate to green infrastructure.

Planning practice guidance: climate change – Neighbourhood Plans can focus their green infrastructure policies on ensuring green infrastructure provision is multi-functional wherever possible – providing flooding, cooling and amenity benefits that encourage more cycling and walking (and therefore fewer trips via motorised vehicle).

## Local planning policy context

The following policies from the two Local Plans are key for Neighbourhood Plans looking to address climate change through green infrastructure:

### Key strategic policies

#### Suffolk Coastal Local Plan (2020)

- [Policy SCLP9.6 – Sustainable Drainage Systems](#)
- [Policy SCLP11.1 – Design Quality](#)
- [Policy SCLP8.2 – Open Space](#)

#### Waveney Local Plan (2019)

- [Policy WLP8.28 – Sustainable Construction](#)
- [Policy WLP8.29 – Design](#)
- [Policy WLP8.23 – Protection of Open Space](#)
- [Policy WLP8.30 – Design of Open Spaces](#)

## Key non-strategic policies

Suffolk Coastal Local Plan (2020)

- [SCLP4.10 Town Centre Environments](#)
- [SCLP8.3 Allotments](#)

There are no non-strategic policies in the Waveney Local Plan.



*Green Roof on family home in Znojmo, Czech Republic (Kuba & Pilar Architects)*

## What can Neighbourhood Plans do? ✓

Neighbourhood Plan Groups should work with their local community to discover what ideas and aspirations people have in relation to green infrastructure and gather evidence to support the desired approach in the Neighbourhood Plan. An evidence base could include information on:

- existing green and blue infrastructure,
- survey data to explain why existing spaces are important to the local community,
- survey data to explain the need/desire for additional types of green space,
- land designations,
- the quality of agricultural land,
- allotment waiting lists, and
- mapping key features such as woodland and rivers.

Sources of information include the [East Suffolk Local Plans](#), the [East Suffolk Healthy Environments SPD](#), and [Natural England](#).

Through Neighbourhood Plans, the main opportunities to provide and protect green infrastructure are through a combination of planning policies and community actions that shape green infrastructure provision through new development (design and site allocation policy criteria), direct CIL spend on existing (publicly owned) green infrastructure, and set out future green infrastructure improvement actions, such as conservation activities, that fall outside of planning.

In the context of development sites that include residential use, 'green infrastructure' refers to the publicly accessible spaces and decorative landscaping that are provided and protected for community recreation, amenity and biodiversity purposes. This can include:

- **Green open spaces**, including:
  - Amenity greenspaces
  - Burial grounds
  - Natural and semi-natural green spaces
  - Parks and gardens
  - Playing fields
  
- **Community food growing spaces**, including:
  - Allotments
  - Community gardens/orchards
  - Community planters (in either hardscape or landscape settings),
- **Trees, hedgerow and perennial plantings** (in either hardscape or landscape settings),
- **General landscaping** (e.g. grass verges of amenity value),
- **Sustainable drainage systems** (SuDS), and
- **Green routes** (active travel routes within a natural setting).

There is significant scope for Neighbourhood Plans to include policies and community actions which support an adequate quantity, quality, and variety of green infrastructure provision. Key options include:

- **Setting green infrastructure policies that directly prioritise climate change resilience** and encourage a design focus on carbon sequestration, habitat creation, and natural-led sustainable drainage schemes in their criteria. Neighbourhood planning groups may also wish to specify design details for any new green infrastructure provided (e.g. 'species selection for street trees must be climate change resilient') to help ensure new provision is appropriate and resilient to climate change impacts. Any site allocation criteria will need to be justified and able to pass viability assessment. For green infrastructure that

specifically supports communities health and wellbeing, Neighbourhood Plans are recommended to cross reference the 'Green Infrastructure' chapter of the [Healthy Environments SPD \(2024\)](#).



*Allotment (Stock image)*

- **Taking a strategic approach to green infrastructure delivery** in their area through their site allocation policies (if applicable), based on what the local community has identified is needed, e.g. because a certain type is missing (e.g. no allotment site), or there is inadequate quantity of a key type. Neighbourhood planning groups can also itemise new green infrastructure projects in their Infrastructure Delivery List, and can decide what level of delivery priority to give it for Community Infrastructure Levy (CIL) spend.
- **The mapping of comprehensive 'green corridors'**, which can be created through the continuous, linear connection of areas of green open spaces through an area – this could be through a development, a centre, or settlement as a whole.

'Green corridors' and 'wildlife corridors' are very similar, and these terms are often used interchangeably. However, it is recommended that Neighbourhood Plans are clear in their use of these terms, using 'green corridor' for when the space is intended

principally for use by people (i.e. as a green open space and part of an active travel route), or principally or exclusively (i.e. no or very limited public access) for use by wildlife, as a 'wildlife corridor'. Neighbourhood Plans can identify the requirement for green corridors or wildlife corridors to be included or part-created through a site allocation(s) in their Neighbourhood Plan.

Guidance for neighbourhood planning groups looking to increase biodiversity in their area is covered in more detail in the [Biodiversity](#) section of this document.

- **Include green infrastructure protection policies** that set high levels of protection for community-valued trees, hedgerow or other landscape features. This may include the need for tree surveys, Ecological Impact Assessment, and the need for such assessments to be undertaken by a suitably qualified Ecologist following published best practice guidance, and the need for assessments to include clear recommendations on appropriate ecological avoidance, mitigation, compensation and enhancement measures to be included as part of developments. This can also be addressed secondarily through Important Views policies, where the value of the view is related to specific community-valued trees, hedgerow or other landscape features.
- **Designating Local Green Spaces.** It should be noted that general protection for open spaces is covered by the respective Local Plans' open space policies. However, Neighbourhood Plans can enhance this protection for specific locally valued green open spaces through designating them as 'Local Green Spaces'. Work needs to be undertaken to identify spaces of particular importance to the community and gather evidence to explain why the space is special to the local community. Green areas could include land where sports pavilions, boating lakes or structure such as war memorials are located, [allotments, or urban spaces](#). The proposed Local Green Spaces will need to be consulted on to ensure they reflect those most valued by the community.

Trees and hedgerows that are seen as valuable may be able to be protected, where justified. Guidance on protecting existing and the planting of new trees is covered in the Council's [Healthy Environments SPD](#), together with the external guidance links it provides.

- **Landscape character and design policies:** it is acknowledged that private land which positively contributes to an overall landscape with distinct, scenic character (and is accessible via Public Rights of Way, or equivalent public access agreements) can provide health and wellbeing benefits to communities, too. In the countryside planning policies only support limited development.

Whilst the principle of development may be found acceptable in the location, Neighbourhood Plans can include evidence and Landscape Character and Design policies that make clear the value and sensitivity of the landscape character to the design of development, and what high quality development would look like in these contexts, therefore increasing the requirements for high quality, location-appropriate design.



*Allotment (Stock image)*

## Community actions

Potential community actions could include actions such as:

- Encourage developers to engage with the criteria set out in the East Suffolk Developers Charter's 'Biodiversity & Landscape' theme area.
- Arrange regular community conservation activities where this is complementary to existing maintenance plans – activities from pruning to litter picking.

## What can't Neighbourhood Plans do? ✖

Neighbourhood Plans cannot prevent allocated sites from being built out, but may be able to add local detail to the site allocation criteria. This could include criteria that necessitates PROWs are retained, enhanced or re-provided through the site.

Neighbourhood Plans must be careful not to add criteria that would in conflict with the site allocation as a strategic policy, including significant changes to the likely viability of the site. Neighbourhood Plans cannot use policy to block windfall development on sites of natural environment value, unless they have been designated as Local Green Spaces (which requires evidence of its value to the community for recreational purposes).

## Case studies

### Local Green Space designations

- Easton Neighbourhood Plan (2024) – [ETN8 – Local Green Spaces](#) This policy is an example of community engagement identifying spaces which are important to the local community and providing the appropriate designation to protect them.
- Rushmere St Andrew Neighbourhood Plan (2023) – [RSA 6 – Local Green Spaces](#) This policy is an example of community engagement and a Local Green Space Appraisal identifying spaces which are important to the local community and providing the appropriate designation to protect them.
- Kessingland Neighbourhood Plan (2017) – [Policy E1: Protection and Maintenance of Local Green Spaces](#) This policy uses the Waveney Open Space Needs Assessment, community engagement and an assessment of existing facilities as an evidence base to designate areas as Local Green Space.

### Sustainable drainage systems (SuDS)

- Beccles Neighbourhood Plan (2021) – [BECC11 – Multi-Value Sustainable Drainage Systems, Biodiversity and Flood Risk](#) This policy addresses any development that generates surface water run-off, the use of sustainable drainage systems (SuDS) and proposals that improve water quality, biodiversity and landscape value of the River Waveney. This policy promotes a range of creative solutions such as green space, green roofs, permeable surfaces, and rain gardens. This has the effect of adding to the relevant Local Plan policy (Policy WLP8.28 Sustainable Construction), which applies only to major developments, by applying it to all scales.

## Landscaping and planting

- **Playford Neighbourhood Plan (2024)** – [PFD4 – Protection of Trees, Hedgerows and other Natural Features](#) – the benefit of this policy is that it adds to and strengthens the relevant Local Plan policy (Policy SCLP11.1: Design Quality, which requires proposals to ‘take account of any important landscape or topographical features and retain and/or enhance existing landscaping and natural and semi-natural features on site’, and Policy SCLP10.1: Biodiversity and Geodiversity) by specifically protecting (from loss or substantial harm to) trees, hedgerows and other natural features such as ponds and watercourses unless ‘unavoidable’.
- **Halesworth Neighbourhood Plan (2023)** – [Policy HAL.ENV5: Heritage trees](#) This policy protects heritage trees within the parish, which are mapped in the Policies Map, from both loss and damage as a result of development.

## Green corridors

- **Bungay Neighbourhood Plan (2022)** – [ENV1 – Green Corridor](#) This is an example of long-standing aspiration of the community being realised through the combination of a Neighbourhood Plan policy and Community Action. The community has wanted access to Skinner’s Meadow and the Neighbourhood Plan helps open up this area.

## Maintenance agreements

- **Worlingham Neighbourhood Plan (2022)** – [WORLD13 – Country Park Landscaping and Management](#) the benefit of this policy is that it adds local requirements to the Local Plan policy WLP8.35-Landscape Character. These local requirements include the landscape design must reflect feedback from the community as captured in the Neighbourhood Plan.

## Key resources

- [Healthy Environments Supplementary Planning Document](#) (2024) This document includes guidance on the key benefits, definitions, and the Council’s preferences for the design and delivery of different types of green infrastructure in the district in the context of providing health and wellbeing benefits has been provided in the East Suffolk Healthy Environments Supplementary Planning Document. It is recommended that neighbourhood planning groups looking to include green infrastructure policies and/or are allocating land for development read this document.
- [Sustainable Construction Supplementary Planning Document](#) (2022) This document includes guidance on the delivery of sustainable drainage systems and more generally the holistic management of surface water is available in the Sustainable Construction

Supplementary Planning Document. Green infrastructure definitions, benefits and the Council's design guidance.

- Locality – [Making local green space designations in your neighbourhood plan.](#)
- [The Tree Council](#) provides free education and information.
- [The Woodland Trust](#) is the largest woodland conservation charity and provide a range of information on protecting and restoring woodland and wildlife.
- [TDAG Organisation](#) provides a forum for cross-sector working, best practice guides, provides information and runs seminars and workshops.

## 6. Biodiversity

### Introduction

East Suffolk Council is [committed](#) to protecting the environment and tackling climate change. East Suffolk declared a climate emergency in 2019 and a biodiversity and ecological emergency in 2024. An Environmental Impact Strategy was adopted by the Council in 2024 and the Environment is a core pillar in [Our Direction 2028](#) that outlines East Suffolk Council's vision for the district.

Biodiversity is defined as the abundance of different species living in an area. Biodiversity is essential to support the process of all life on Earth, including humans. Maintaining ecological balance is important for maintaining food, air, water, and other resources. The more biodiverse an ecosystem, the more resilient it is against various crisis like infestations, disease or climate change.



*Marsh Harrier (stock image)*



*Kittiwake (stock image)*

East Suffolk is fortunate to have a rich and varied biodiversity spread across a diverse range of habitats, from coastlines, wetlands, woodlands, heathlands to marine ecosystems. The coastal habitats, form the part of the Suffolk Coast and Heaths, dunes, marshes and shingle beaches which are home to priority and rare species. Shingle beaches along the coast, including at Orford Ness, support rare plants such as sea pea and sea kale, whilst reedbeds and estuaries support bird species like marsh harrier, bitterns and avocets. Heathlands are the habitats for nightjars, woodlarks, adder (Britain's only venomous snake, which is found in Suffolk and are scarce nationally) and butterflies like the silver studded blue. The wetlands from the Broads to Minsmere are internationally important for breeding and wintering birds, particularly wildfowl

and waders, and also important for plants like frogbit, invertebrates like the Norfolk hawker dragonfly and mammals like otter. The ancient woodlands and parklands support rare flora and invertebrates, and populations of species such as bats and badgers. While grasslands provide habitats for flora and butterflies.

Many areas in East Suffolk have local, national and international designations designed to protect flora, fauna and habitats such as County Wildlife Sites, National Nature Reserves, Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPAs), Ramsar Sites and Special Areas of Conservation (SACs).

The impacts of climate change are beginning to be experienced in East Suffolk. The impacts include heat waves and droughts in summer, milder temperatures and increased rainfall in winter, increased risk of flooding, higher rates of coastal erosion, and more extreme weather events such as severe storms. These will affect East Suffolk flora and fauna with some species struggling to adapt to changes and fragile areas of biodiversity at risk of being damaged or destroyed.



*Captain's Wood Nature Reserve, Sudbourne*

## The role of legislation

The **Environment Act 2021** is new legislation which aims to improve biodiversity through a number of different mechanisms including:

- A target on species abundance-by 2030
- A minimum 10% biodiversity net gain requirement for most new development
- A requirement for Local Nature Recovery Strategies and the creation of a Nature Recovery Network

The Environment Act also strengthens the duties within the Natural Environment and Rural Communities Act 2006 (**NERC Act 2006**), for all public bodies to conserve and enhance biodiversity. The Duty applies to all local authorities, community, parish and town councils.



*RSPB Minsmere, Westleton, Suffolk*

## Policy context

### National planning policy context

The National Planning Policy Framework (NPPF) has a dedicated [Chapter 15](#), setting out the core principle that any new developments should contribute to conserving and the enhancement by providing [Biodiversity Net Gain](#) (BNG) protecting habitats and ecosystems during and after development. Enhancement is required under the NPPF regardless of whether impacts occur from development. The mitigation hierarchy outlines the approach to be taken. In the first instance, impacts to flora, fauna and wildlife should be avoided. Where this is not possible, mitigation is required and with compensation as a last resort. Significant protection is given to the internationally, nationally and locally designated sites and urging positive planning for ecological and green infrastructure networks.

Planning Practice Guidance on [Natural Environment](#) notes there that public authorities have a 'biodiversity duty' to consider how they can conserve and enhance biodiversity. Sites allocated for development should consider biodiversity impacts and require applications to submit proportionate information and assessment necessary for the impacts.



*Benacre National Nature Reserve, Covehithe*

## Local planning policy context

The [Suffolk Coastal Local Plan](#) and [Waveney Local Plan](#) both have dedicated chapters on the Natural Environment which provide useful information on the area and include several relevant policies.

### Suffolk Local Plan (2020)

- [SCLP 10.1 Biodiversity and Geodiversity](#)
- [SCLP10.2 Visitor Management of European Sites](#)
- [SCLP10.3 Environmental Quality](#)
- [SCLP10.4 Landscape Character](#)

### Waveney Local Plan (2019)

- [WLP8.34 Biodiversity and Geodiversity](#)
- [WLP8.35 Landscape Character](#)

The Healthy Environments Supplementary Planning Document (SPD) provide a lot of useful information. The chapter on [Green Infrastructure](#) provide detailed information on green open space, green routes, planting, sustainable drainage systems and green roofs and walls.

## What can Neighbourhood Plans do? ✓

The Neighbourhood Plan Group should, discover the local community's aspirations and ideas, gather evidence to support policies, make appropriate recommendations, seek local knowledge and work with the community. We recommend that the Neighbourhood Plan Groups consult and work with local residents, East Suffolk Ecology and Landscape Officers, [Suffolk Wildlife Trust](#), [Suffolk Biodiversity Information Service](#) and other relevant local organisations to learn about the biodiversity in the Neighbourhood Plan area and what peoples aspirations are.

Parish and Town Council can designate areas as Local Nature Reserves (LNRs) if they are important locally for wildlife, geology, education or enjoyment (without disturbing wildlife). Parish and Town Councils may want to use the process of community engagement and evidence gathering done to support the development of a Neighbourhood Plan, to also support the delivery of a LNR.

A Neighbourhood Plan could have a vision and objective that focuses on the natural environment, green infrastructure enhancing the biodiversity.

Neighbourhood Plan policies could:

- Deliver the aspirations of local people by focusing on local issues identified as important during community engagement – this is the key benefit of Neighbourhood Plans. Recognise the local features for biodiversity and existing green space, like wildlife corridors, Suffolk

priority habitat, Suffolk priority species, trees and hedgerows. Identifying where improvements would make a positive change in the local biodiversity.

- Identify any local, national or internally designated areas within the Neighbourhood Plan area.
- Protect existing areas of biodiversity by mapping and making a list of biodiversity/ environmental assets in the Neighbourhood Plan area, including existing designated sites, such as County Wildlife Sites. This inventory could help in recognising and identifying the key biodiversity sites and species. These could include open spaces forming an urban habitat to green infrastructure including parks, playing fields, allotments, street trees, woodlands to private gardens. Churchyards and older buildings are also a good habitat, as are disused railway lines, railway embankments, old roads, green lanes, traditional orchards, etc.
- Identify the value of each site to the community and whether they require conservation/ protection and enhancements.
- Identify with deliverable actions and aspirations to make these areas bigger, better and/or more connected to each other. Develop a Habitat Management Plan and future-proof it by encouraging habitat restoration projects that account for changing climatic conditions. Set habitat conservation targets and priorities (e.g. “protect and enhance 30% of natural and semi-natural habitats within the Neighbourhood Plan area by 2030”).
- Designate local green spaces to establishing green corridors by interlinking green infrastructure and open spaces, even a strip of hedgerow and green provides access to insects, reptiles, birds and smaller mammals.
- Enhance biodiversity by identifying if there is a need for improved and/or new planting, hedgerows, scrub or habitat enhancement bordering a Public Right of Way. Even widening the landscape features connecting unimproved pasture (grassland, grazing green), derelict land, meadows, wetlands- fens, marshes, reedbeds, planting native trees, retain existing trees (particularly with holes and rotten branches, acting as homes for beetles and insects).
- Identify and map existing blue infrastructure from rivers, streams, ditches, lakes and ponds.
- Support and encourage to deliver 20% Biodiversity Net Gain where practically possible, instead of the statutory minimum 10% Biodiversity Net Gain. (See Policy HAD3 Biodiversity-led and wildlife-friendly design.) Where BNG cannot be delivered onsite, support offsetting that is delivered nearby the site or parish. (Note BNG is not designed to offer community

benefits and delivery of BNG outside the Neighbourhood Plan area would reduce the likelihood of any direct benefit for the local community.)

- Provide buffer zones around designated sites and create wildlife corridors between fragmented habitats, such as linking woodlands and wetlands for species like the Norfolk hawk and water vole.
- Any land allocated for development in the Neighbourhood Plan could improve biodiversity by incorporating habitat connectivity features such as:
  - Wildlife-friendly drainage systems (reedbeds, swales, ponds)
  - Species-rich wildflower meadows instead of traditional amenity grassland
  - Planting diverse native hedgerow species in place of fences
  - Planting native species that support pollinators and birds
  - Set a standard for wildlife-friendly buildings, including Integrated swift bricks, bat boxes, bird boxes and wildlife crossings
  - Green roofs/walls

Neighbourhood Plans should aim to:

- Produce a biodiversity/ habitat map, that includes designated sites such as County Wildlife Sites and highlights areas for recovery/improvements and linking them to form wider habitats.



*RSPB Minsmere, Westleton, Suffolk*

## Community actions

Not all the community's aspirations for biodiversity may be achieved through the planning system. The Neighbourhood Plan can consider setting out community action points in the for Town/ Parish Council and other community action groups to follow up.

Community action could include:

- Have a Biodiversity Community Action Day to raise awareness (see the example set by [Stowmarket](#)).
- Organise days to litter pick across the town/village particularly focusing on green spaces.
- Consider how the biodiversity of land owned and managed by the Town or Parish Council can be improved.
- Check for dead trees and plants on new developments and inform the developer and East Suffolk Council to ensure they are replaced in accordance planning conditions.
- Create a community wildlife group to plant new native plants and/or climate resilient plants that support wildlife.
- Arrange for local businesses to sponsor new landscaping and tree planting.
- Encourage existing homeowners to install bird boxes, bat boxes and hedgehog holes in fences. This can be enhanced by creating a community network of gardens which aim to help wildlife.
- Identify areas that could benefit wildlife be it from 'wilding', wildflower sowing, or tree planting, and carry out an assessment of the value of the existing habitat and develop a plan to enhance each area. Organisations including Suffolk Wildlife Trust may be able to help with the assessment.
- Putting out signage to explain why certain areas aren't mowed or 'taken care of'.
- Monitoring/ surveying existing areas to find out what is there, such as carrying out bird and butterfly counts. Following improvements, surveys can be repeated to see the impact changes have made to the wildlife. Having survey results can be good method of defending a particular approach to landscape management.

- Communities often have people with lots of local knowledge of the flora, fauna and wildlife. Identify local people with knowledge to assist in the drafting and carrying out community actions.
- Join the [Greenprint Forum](#) and connect with likeminded people who are interested in the environment. Received news about any local projects, volunteer groups and possible funding pots that available. Get inspiration for what your local community can do.



*Flowers outside of East Suffolk House in Melton. Signage for areas left 'wild' for bees.*

## Case studies

### East Suffolk Neighbourhood Plan policies:

- **Saxmundham Neighbourhood Plan (2023)** – [SAX13 Protection and enhancement of natural assets](#). This policy supports 10% BNG and use of the mitigation hierarchy.
- **Wickham Market Neighbourhood Plan (2023)** – [Policy WICK4 Provision for wildlife in new development](#). The policy supports developments that incorporate new native plant species (including within drainage swales), wildlife corridors, specific amphibian, bird and bat measures, and wildlife friendly boundaries.

### Other Neighbourhood Plan policies:

- **Hadleigh Neighbourhood Plan** (Babergh District Council) – [Policy HAD3 Biodiversity-led and wildlife-friendly design](#). The policy was adopted before BNG was mandatory and seeks a minimum of 10% biodiversity net gain and encourages 20%.
- **Thame Neighbourhood Plan** (2024) [Policy NEB1: Biodiversity](#) was adopted before BNG was mandatory and supports 10% BNG, favours BNG being delivered onsite, encourages applicants to seek competent ecological advice, and to include existing trees and hedgerows.
- **Blakeney Neighbourhood Plan** (2023) (North Norfolk) - [Policy 11 Biodiversity & Accessibility](#). This policy was adopted before BNG was mandatory and seeks 10% BNG together with improved connections to existing open spaces. Requirements for Landscape proposals for developments and Arboricultural Impact Assessment if tree and hedgerows are being removed.
- **Filby Neighbourhood Plan** (2022) (Great Yarmouth Borough Council) - [Policy E1: Habitat for Wildlife](#). The policy was adopted before BNG was mandatory and requires 10% BNG together with conserving existing biodiversity features and notes any net loss on site will be expected to compensate by improving local wildlife corridors.
- **Ryburgh Neighbourhood Plan** (2021) (North Norfolk) – [Policy 7 & 8 Protection & Enhancement of Local Habitats and Policy 9 Ecological Network](#). Policies that require ecological assessment, Habitat Regulation Assessment and mitigation.

### Key resources

- The [Norfolk and Suffolk Local Nature Recovery Strategy](#) is a new collaborative approach to restoring and protecting biodiversity. There are events, webinars, and online consultations. The website provides publications with advice and latest news updates. There is a shortlisted priority species and habitats list for Suffolk available.
- The [Suffolk Biodiversity Information Service](#) provides useful information on wildlife across Suffolk, practical tips for Parish Councils and information hedgerows.
- [Suffolk Wildlife Trust](#) can offer advice and provide webinars on development that is specific to the neighbourhood area. The Suffolk Wildlife Trust can be contacted via: [planning@suffolkwildlifetrust.org](mailto:planning@suffolkwildlifetrust.org)
- [Swift and Wild](#) by Suffolk Wildlife Trust provides guidance on building houses that support nature.
- [Biodiversity Net Gain Interim Planning Guidance for Suffolk](#) (May 2023) provides guidance on the new BNG requirements.
- [Suffolk's Nature Strategy](#) (2015) by Suffolk County Council. It should also be noted that Suffolk County Council are in the process of producing a Local Nature Recovery Strategy (LNRS) for all of Suffolk.

- The [Planning Advisory Service](#) offer information and guidance in the environment including biodiversity net gain.
- Government guidance on [Construction near protected areas and wildlife](#) – information for developers on how to avoid harming protected areas and species during development work.
- Government guidance on [Natural Environment](#) – explains key issues in implementing policy to protect and enhance the natural environment, including local requirements.
- Government guidance on [getting environmental advice on neighbourhood plans, development orders and community right to build orders](#) – find out which environmental agencies you need to consult about your Neighbourhood Plan, neighbourhood development order or CRTBO.
- [Process Journey for neighbourhood plan Groups](#) – incorporating green infrastructure into Neighbourhood Plans using the Green Infrastructure Framework – Principles and Standards for England (Jan 2023)

## 7. Mitigating Flood Risk

### Introduction

Flood risk is defined as the potential for flooding from any source, now or in the future. Flood risk sources include rivers, sea, groundwater and heavy or prolonged rainfall which can overwhelm minor watercourses and drainage systems (known as surface water flooding).

Development sites themselves can also present a new flood risk, through new roads, roofs and hard surfaces contributing to surface water flood risk both on and off the site, if this is not properly mitigated against. It is therefore essential for new developments to mitigate their effects and deal with their surface water on-site.

Due to climate change, resulting in increased storm events, prolonged periods of rainfall and sea level rise, we are likely to see more extreme weather events that result in flooding and the associated risks and consequences.

Flooding can pose significant threats to health and wellbeing, including risk of drowning, exposure to waterborne diseases and respiratory issues relating to exposure to damp conditions following flooding.

Flood risk is a significant issue across parts of East Suffolk. Communities near the coast or Main Rivers are often in or close to flood zones and other more inland areas are particularly at risk from surface water and groundwater flooding. It is particularly an issue along our coastline and river valleys. In the Autumn of 2023 Storm Babet highlighted many of the problems that flooding can cause including the internal flooding of homes and businesses, and disruption to roads. Even seemingly low levels of flood water can knock people off their feet. Flood damage can be costly and time consuming to resolve and have a devastating impact on people's physical and mental health.

### National Planning Policy and Legislation

The National Planning Policy Framework (NPPF) requires strategic policies in Local Plans to make sufficient provision for flood risk and coastal change management. These policies should be informed by a strategic flood risk assessment, and apply a sequential, risk-based approach to the location of development. Links to the Suffolk Coastal and Waveney Local Plan policies are provided below. There is no NPPF requirement for Neighbourhood Plans to address flood risk, if the plan does not allocate land for development, but Neighbourhood Plans must be in general conformity with strategic policies.

The NPPF has a dedicated chapter on [Meeting the challenge of climate change, flooding and coastal change](#) which sets out how the planning system should take account of flood risk and coastal change. It encourages plans to take a proactive approach to mitigating and adapting to

climate change. This includes planning for the long-term implications of flood risk, creating resilient communities, providing space for physical protection measures and planning new development that avoids vulnerability arising from climate change.

The NPPF requires all plans to apply a sequential, risk-based approach to the location of development. The sequential test is a method of assessing flood risk and directs development to areas with the lowest risk (paras. 170-176). The NPPF also sets out the requirements for an exception test (paras. 177-180), when it is not possible to direct development to an area with the lowest risk. Paragraph 181 states that development should not increase flood risk elsewhere and paragraph 182 ensures that new development incorporates sustainable drainage systems.



*Framlingham flooding after storm Babet, 2023*

## The Environment Agency

The [Environment Agency](#) is responsible for managing the risk of flooding from rivers and the sea and also the risk of coastal erosion. The Environment Agency is the lead organisation for providing flood and coastal risk management and warnings of flooding from main rivers and on the coast. The Environment Agency is responsible for producing and publishing Flood Zones 1, 2 and 3 ([Flood maps for Planning](#)) and are available online.

The Environment Agency is a statutory consultee that must be consulted on major development in flood 2 or 3, and in flood zone 1 which has critical drainage problems, and which has been notified for the purpose of this provision to the local planning authority by the Environment Agency. The Environment Agency is also a statutory consultee for any development carried out

within 20m of the top of a bank of a main river. As well as the Local Lead Flood Authority, the Environment Agency also provides pre-application advice to developers. Site specific flood risk assessments and strategic planning should take into account the National guidance for [flood risk assessments](#).

## Flood Management in Suffolk

Suffolk County Council (SCC) is the [Lead Local Flood Authority](#) (LLFA) and is responsible for all other forms of flood risk including surface water flooding, flooding from unknown sources. SCC carries out flood investigations, advises on surface water management, and SCC in its capacity as the Highway Authority undertakes highway drainage works and maintenance.

SCC is statutory consultee for surface water drainage proposals for major developments (residential developments of 10 or homes, sites of 0.5 hectares or more, or commercial buildings of 1,000sqm or more). SCC also provides pre-application advice to developers. The LLFA are the primary influence on how developers need to address surface water drainage on developments and play a key role in how Sustainable Drainage Systems (SuDS) are designed.

Over the past decade the influence of the LLFA on planning decision making has grown considerably, bringing significant benefit to developments mitigating surface water and also increasing the amount of landscaping, biodiversity and space on developments as part of this.

Flood risk is an important consideration for any Neighbourhood Plan Group seeking to allocate land for development. Early consideration should be given to National and Local Plan policies and the land's risk of flooding. Neighbourhood Plan policies relating to flooding and drainage are advised to consult SCC at an early stage.



*Framlingham flooding after storm Babet, 2023*

## Permitted Development Rights

Most, but not all houses have permitted development rights that allow for certain works to be undertaken to a house without the need for planning permission. Guidance on permitted development rights is available on the [East Suffolk website](#) and in the Government's [Technical Guidance on permitted development rights for householders](#).

Permitted development rights allow up to [5 square metres](#) of land to be covered in a non-permeable, hard surface between the front of the house and the road. Elsewhere around a house there are no restrictions on the amount of land that can be covered with non-permeable, hard surfaces. However, raising the land to create embankments or terracing to support a hard surface may require planning permission. There is no limit on the amount of land that can be covered by a permeable or porous surface.

Permeable or porous surfaces can help prevent surface water run-off into roads or onto neighbouring land, and can help prevent flooding. Neighbourhood Plan policies can require surfaces around new dwellings, such as for driveways, car parking, paths etc, to be permeable or porous materials.

## Local planning policy context

The key policies of the Local Plans for mitigating flood risk are:

### Suffolk Coastal Local Plan (2020)

- [SCLP9.3: Coastal Change Management Area](#)
- [SCLP9.4: Coastal Change Rollback or Relocation](#)
- [SCLP9.5: Flood Risk.](#)
- [SCLP9.6 Sustainable Drainage Systems](#)
- [SCLP9.7 Holistic Water Management](#)

### Waveney Local Plan (2019)

- [WLP8.24 - Flood Risk.](#)
- [WLP8.25 – Coastal Change Management Area](#)

Both Local Plans' Flood Risk policies, reflecting national policy, provide strict criteria around allocating land for development in areas at risk of flooding:

“...neighbourhood plans can allocate land for development, including residential development, in areas at risk of flooding providing it can be demonstrated:

- a) There are no alternative available sites appropriate for the proposed use within the Neighbourhood Area;
- b) The development provides sustainability benefits which outweigh flood risk; and
- c) Evidence is provided that it is possible for flood risk to be mitigated to ensure development is safe for its lifetime and the lifetime of the relevant flood defence.”

The sustainability benefits may be the regeneration of brownfield land, economic diversification of agricultural businesses, or expansion of employment land.

Both Local Plans have policies that relate to Sustainable Drainage systems (SuDS). Surface water should not be connected to the foul drainage system. Surface water should be considered a resource rather than a waste product and managed effectively through SuDS that are integrated into the landscaping scheme and green infrastructure provision (see [Green Infrastructure](#) section).

Both the Suffolk Coastal and Waveney Local Plans were supported Strategic Flood Risk Assessments which are available online in the [Local Plan evidence base](#).

## Supplementary Planning Documents and Local Guidance

The [Coastal Adaptation Supplementary Planning Document](#) (2023) was jointly produced by East Suffolk Council with the Broads Authority, Great Yarmouth Borough Council, and North Norfolk District Council. The SPD provide guidance that maybe relevant and of interest to coastal communities.

Suffolk County Council provides guidance on development and [flood risk](#) for developers and local planning authorities to assist in creating suitable drainage systems. This includes a pre-application advice service and a series of documents offering advice.

- [Suffolk Flood Management Strategy](#)
- [Appendix A – Suffolk SuDS Guide](#)
- [Appendix B – Working on Watercourses](#)
- [Appendix C – Surface Water Drainage](#)
- [Appendix D – Flooding Investigation](#)

The [Healthy Environments Supplementary Planning Document](#) (2024) includes a ‘Green Infrastructure’ chapter, which covers the design of multi-functional SuDS.

## Flood Risk and Drainage Vision and Objectives that could be included within the Neighbourhood Plan

It is not advised to allocated development where there is a risk of flooding. Where development is proposed in areas at risk of flooding, Neighbourhood Plan policy should seek to ensure that: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations. (NPPF Paragraph 172).

All sites where development is proposed should be thoroughly assessed for existing watercourses which run along the boundaries or through the site. Development near watercourses must ensure these are maintained and protected throughout the construction stages and during the lifetime of the development. Existing watercourses are a vital part of the catchment’s natural water management system and any reduction in their extent or capacity has the potential to increase flood risk elsewhere. Watercourses and informal surface water overland flow paths should be incorporated within development layouts via green and blue corridors through the layout.

Where there are existing flood risk issues and watercourses that have been historically piped, straightened or altered in some way that reduces their capacity to manage flood water, development should be encouraged to re-naturalise these where possible.



*Flooding in Station Square, Lowestoft, 2013*

Existing floodplains which are currently built on or used for purposes which are not compatible with flooding should be returned to floodplains and their capacity for holding flood waters maximised to ensure that flood waters are safely contained in these areas and do not encroach into the more vulnerable areas such as homes and main infrastructure routes. Neighbourhood Plans can work with landowners and support the use/ return of land to floodplains, however requiring the change of use of land is beyond the scope of Neighbourhood Plans.

### What can Neighbourhood Plans do? ✓

Neighbourhood Plan Groups should discover what ideas and concerns people in the local community have, where in the neighbourhood area there are issues with flooding, and gather evidence to support the desired approach to the Neighbourhood Plan.

Neighbourhood Plan policies could:

- Use national mapping provided by the EA (see links below) to identify which parts of the parish are at risk from flooding either from:
  - Groundwater and reservoir flooding.
  - Surface water (pluvial flooding), this is flooding that is not associated with a river and is a result of rainfall accumulating and flowing along the ground surface

<https://check-long-term-flood-risk.service.gov.uk/map?eastings=585364&northings=264375&map=SurfaceWater>

- Rivers (fluvial flooding), flooding originating from a river or watercourse,
- Coastal/tidal flooding, flooding from the sea.
- <https://flood-map-for-planning.service.gov.uk/>
- Prioritise directing development away from at highest risk (whether existing or future), where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere (as per NPPF Paragraph 178).
- Where possible the Neighbourhood Plan should be informed by a strategic flood risk assessment to ensure a risk-based approach is taken to the location of development. Strategic Flood Risk Assessments should use climate change data to ensure all sources of flooding have been taken into consideration.
- Set a specific flood policy that relates to development in the Neighbourhood Plan area.
- Provide a sustainable drainage policy.
- Require green infrastructure to be integrated into development to reduce flood risk.
- Require permeable surfaces to be used in around new buildings including for driveways, parking areas, patios and paths.

## Community actions

Not everything Neighbourhood Plan Groups and Town and Parish Councils want to achieve can be delivered through the planning systems. Neighbourhood Plan Groups can consider setting out community action points in the Neighbourhood Plan that can be followed up the Town/ Parish Council and other community action groups.

Members of Neighbourhood Plan Groups and Town and Parish Councils are likely to have much closer relationships and greater influence on landowners than East Suffolk Council. They will therefore be better able to work with landowners to resolve local issues for mutual benefit.

Community actions could include:

- Gather evidence and keep up-to-date records of local areas that have flooded occasionally, seasonally or from extreme weather events and make the information available to landowner, developers and Councils.
- Work with SCC and East Suffolk Council to raise awareness locally of how to make properties more flood resilient and raise awareness of any funding available to homeowners and businesses.
- Work with local landowners to identify and resolve local flooding issues.
- Work with landowners to identify and provide land for use as natural flood management (which could include creating or extending existing ditches, drains, attenuation ponds, flood plains, tree planting, watercourse naturalisation etc).

- Encourage the community is signed up to flood alerts.
- Identify existing properties at risk of flooding and work with owners to ensure they have adequate flood response plans in place.
- Support and encourage the use of permeable surfaces around homes for new driveways, parking areas, patio and paths. Raise awareness of the benefits of permeable surfaces over non-permeable surfaces in reducing flood risk.

## Case studies

### East Suffolk Neighbourhood Plan policies

- Southwold (2022) – [Policy SWD14 Minimising the impact of flooding](#)
- Beccles (2021) – [Policy BECC11 – Multi-Value Sustainable Drainage Systems, Biodiversity and Flood Risk](#)
- Kessingland (2017) – [Policy FD1 – Minimising the Impact of Flooding from Development](#)
- Great Bealings (2017) – [Policy BE3 Avoidance of Flood Risk](#)
- Leiston (2017) – [Policy F1 Addressing Localised Flooding Matters](#)

### Other Neighbourhood Plan policies

- Capel Neighbourhood Plan (2024) - [Policy C4: Mitigating the impact of flooding](#) requires SuDS to be incorporated into development.
- The Thame Neighbourhood Plan (2024) [Policy NEF1: Flood risk and sustainable drainage](#) sets out the criteria for how sustainable drainage should be designed and incorporated into developments.
- Broadclyst Neighbourhood Plan (2023) – [Policy DC3 Sustainable Drainage](#) requires SuDS to enhance the local environment and provide additional benefits such as:
  1. Water treatment and the removal of pollutants.
  2. Infiltration and groundwater replenishment.
  3. Recreation and amenity space provision.
  4. Biodiversity and habitat creation.
- Broadclyst Neighbourhood Plan (2023) – [Policy NE7 Flood Management](#) requires flood management to include:
  - Tree and hedgerow planting to slow the rate of water flow across a catchment.
  - River and floodplain naturalisation (reconnecting rivers to their floodplains).
  - Provision of woody debris dams.
  - Schemes which enhance and improve soil/land management.
  - Creation of water storage capacity within the floodplain.
  - Biodiversity enhancements that will help to deliver NFM measures.

## Key resources

- Planning Practice Guidance - [Flood risk and coastal change](#)
- Government – [Get flood risk information for planning in England](#)
- Town and County Planning Association – Neighbourhood planning in a climate emergency, [Chapter 8 Flooding, extreme weather and water conservation](#)
- Suffolk County Council [Flood Smart Living](#)
- Suffolk County Council [Guidance on development and flood risk](#)
- Town and County Planning Association resources – [Planning for flood risk in England](#)
- Neighbourhood planning for the Environment by Locality – page 30 [Managing the risk of flooding](#)
- [Reclaim the Rain](#) – Pioneering new ways to build water resilience in Norfolk and Suffolk
- Northamptonshire County council Flood Toolkit - [22.Neighbourhood-planning.pdf \(floodtoolkit.com\)](#)

## Appendix 1: Glossary

- **Burial grounds** – cemeteries and graveyards.
- **Community actions** – these are commitments identified by the community for the community (usually the Town/Parish Council) to take action on issues which are not planning related but are able to be captured in the Neighbourhood Plan to be addressed over the Neighbourhood Plan period.
- **Community food growing spaces** – spaces that are protected for the purpose of localised, non-commercial food growing in a social, community space setting, including allotment sites, community gardens/orchards, and can include community planters in either hardscape or landscape settings.
- **General landscaping** – for the purposes of this guide, ‘general landscape’ can be taken to mean areas of grass that are not substantive enough to provide usable open space benefits, and instead serve a primarily decorative and/or biodiversity purpose, such as grass or wildflower verges. A wider definition of ‘general landscaping’ may also include hardscape features, sculpture, decorative earthworks and so on.
- **Green open spaces** – include parks and gardens, Natural and semi-natural green spaces, Amenity greenspaces, Local Green Spaces (LGS), Playing fields, burial grounds.
- **Green routes** – active travel routes that have been provided within a rich natural setting that are physically segregated from motorised vehicles, maximising their usability and leisure and nature-immersion value (a local example of this are the routes through green spaces seen in Kesgrave).
- **Infrastructure** – the essential physical structures and facilities which support the functioning of communities. Examples include roads, paths, water/waste/energy systems, schools, hospitals.
- **Infrastructure Priority Lists** – Neighbourhood Plans can use Infrastructure Priority Lists to identify and rank the community’s priorities for the expenditure of CIL and other forms of funding in the Neighbourhood Plan area.
- **Local Green Spaces** – green open spaces that have been designated and protected by the local community due to their identified community value (as per the NPPF criteria). They will tend to be woodlands, village greens and other informal, natural spaces. As per the current Local Plans’ policies (SCLP8.2 and WLP8.23), Local Green Spaces in East

Suffolk are designated via 'made' neighbourhood development plans;

- **Mitigation** – a process or action to reduce the impact or effect of harm.
- **Passivhaus** – a system of designing and constructing a building that is highly insulated, air-tight and energy efficient. The Passivhaus Trust provides certification for building designers and building inspectors. The Passivhaus Trust has independent quality testing and certification process that ensure the constructed building meets Passivhaus Standard before certification is issued.
- **Playing fields** – natural fields provided to accommodate one or more natural playing pitches for traditionally natural-surfaced sports such as football and rugby.
- **Sustainable drainage systems (SuDS)** – drainage systems that have been designed using natural features to slow the flow of rainwater and safely collect it, therefore reducing flood risk on and off site, whilst also providing amenity and biodiversity benefits. SuDS are typically designed around slowing and moving rainwater from higher points on the site down to lower points where it can safely collect in natural features such as drainage basins/ponds, swales, wetlands, rain gardens, etc. SuDS also work by capturing water close to where it initially fell, through increasing the absorption capacity of the ground (i.e. through the planting of appropriate species of trees, shrubs, grasses, and how they absorb water through their roots, etc.) or even structures, through use of features such as green roofs or walls. SuDS are expected to be as functional as more 'hard engineered' drainage systems (e.g. soakaways), but with the added value of being attractive, supportive of nature, and useable (i.e. larger, more accessible features can function as green open space when not full of water) through the design and planting approach taken.
- **Tree and perennial plantings** – trees, shrubs and other woody or herbaceous perennial plants that have been planted in either a hardscape setting (such as street trees) or in a landscape setting (such as within a green open space).
- **Whole Life-cycle carbon assessment** – carbon emissions from building materials (including the raw extraction of materials, manufacture of materials and transporting materials), the construction of a building, use of building over its entire life span, demolition of the building, and disposal of any materials.
- **Zero carbon ready building** – a highly energy efficient building designed to use low level of energy and has low carbon heating and hot water systems (such as air source heat pumps) and/or renewable energy generation on site (such as solar panels).

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