



OTLEY NEIGHBOURHOOD PLAN

Inspection Comment responses & Reg16 responses

Otley Neighbourhood Plan Group 15.05.2025

Introduction.

The Neighbourhood Plan Group (representing the Parish Council) has worked through the Inspection initial comments in order with responses provided below in blue colour. The Inspection initial comment numbering has been retained for cross referencing as well as the initial comment text. Comments and responses where required from bodies other than Otley Parish Council have not been included.

Regulation 16 Comments

1. I would like to offer the Parish Council the opportunity to comment on the representations that were submitted to the plan as part of the Regulation 16 consultation. I do not expect a response to every comment made, just those that the Parish Council feels that it wishes to respond to or comment upon.

[Responses to Reg16 consultation comments are at the end of this document.](#)

Quality of the Mapping

8. I found the mapping rather difficult to interpret, both in the document and online. In particular, it would be helpful if the base maps could have a greater contrast, as at present it is really faint. I would particularly draw attention to Figures 2 and 4, Views Maps 1 and 2, and Appendices D and K.

[Agreed. But we would need assistance from East Suffolk Council on this as we did with the original maps since we do not have the software resources for this.](#)

Timeframe of the Neighbourhood Plan

9. Does the Parish Council have a view on whether the timespan of the plan, 2019 -2036 should be included in the title of the plan?

[Agree that we need to add the timespan to 2036.](#)

Neighbourhood Plan Policies

[Policy ONHP1: Ecology and Biodiversity](#)

10. Does the Parish Council have a view as to whether the five priority habitats set out in paragraph 4.2.4 should be included within the requirement c)?

[It is agreed that the five priority habitats would usefully be included in requirement c\)](#)

11. in terms of the 20% biodiversity net gain requirements set out in e), I am guided by the advice set out in Planning Practise Guidance (Ref ID 74-006 – 2024- 0214) which states:

*“Plan makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain either on an area wide basis or for specific allocations for development **unless justified**. (my emphasis) To justify such a policy needs to be evidence leading to the local need for a higher percentage, the local opportunities for a higher percentage and any impact on viability for development”*

The East Suffolk Council document “Neighbourhood Planning Guidance for Climate Change” states that Neighbourhood Plans can support and encourage the delivery of 20% Biodiversity Net Gain where practically possible.

Policy ONHP1 states that developments “should seek to” achieve a 20% BNG gain – which is generally aligned with the aforementioned document.

The Suffolk Local Nature Recovery Strategy is currently out for public consultation which includes a draft strategy map - the 'Suffolk Local Habitat Map'. This map identifies significant areas within Otley Parish which Could Become of Particular Importance for Biodiversity (ACB). As defined in Appendix 6 'Glossary' (page 296) of the draft strategy ACB are 'areas identified to be of strategic significance and present opportunities for nature recovery'. The Parish can support this by encouraging 20% BNG.

<https://www.suffolk.gov.uk/council-and-democracy/consultations-petitions-and-elections/consultations/local-nature-recovery-strategy>

Suffolk Wildlife Trust consultation regulation 16 response is also very supportive of this approach for reasons given in their response.

The Parish Council is mindful that the style of policy wording in Hadleigh Neighbourhood Plan HAD3 is widely accepted on this issue and might present a clearer approach if necessary.

The Parish Council notes the generally supportive stance in the regulation 16 response from the Environment Agency.

12. I know that the justifications set out in paragraphs 4.2 .7 to 4. 4.13 are reflecting the national situation or indeed the international, or on a district wide basis. The only specific justification for a higher threshold for this village is included in paragraph 4.2.14, which in my view does not provide the convincing evidence to as set out in the above section of the Planning Practise Guidance. I will be particularly interested in seeing any modelling demonstrating the impact of the higher percentage of net biodiversity gain on scheme viability.

Justifications as above. The Parish Council has no resources for modelling scheme viability but would argue that this should not be a barrier to ambition.

13. The final part of the policy seeks to resist significant degradation. Can the Parish Council expand on how this would be achieved, if that degradation took place prior to the submission of a planning application, indeed some site clearance may be required for site investigations etc? Such works may not constitute development coming under planning control. Is the policy suggesting that an acceptable development should be refused planning permission solely due to the action of premature site clearance? The impact of site clearance and the question of when it was carried out, can be an important consideration in calculating net biodiversity gain.

It is not intended to require refusal due to premature clearance, but the inspector’s final sentence makes the point here very well. The Neighbourhood Plan is trying to get to a point where any such clearance should be robustly justified and perhaps where insufficient justification is provided then a higher BNG target might be expected/imposed.

14. Now the statutory net biodiversity gain regime is in place, does the Parish Council consider

it appropriate that the 20% biodiversity net gain threshold be imposed on all “new development” including those that are excluded from the national scheme, such as householder development, de minimus development and self-build schemes?

It is reasonable to exempt de minimus development from the 20% BNG threshold target notwithstanding the comment in 11, 12, 13 above.

Policy ONHP2: Landscape and Amenity

15. I note that the first part of the policy is nuanced, in that it refers to significant adverse impacts being balanced against the benefits of the development. However, the use of the term “must”, in the second paragraph, implies a stricter interpretation, for example if a length of hedgerow were to be removed to create an access and that did not have a significant adverse landscape, and visual effect would that be unacceptable?

16. Would the Parish Council accept the policy being caveated along the lines of “where possible”?

Yes. Perhaps the word “should” is a bit tighter than “where possible” but not overly so.

Policy ONHP3: Conserving the setting of the church

17. I am conscious that the land surrounding the church, as shown in Figure 4.8, is already protected as countryside, as it sits outside the settlement boundary. The importance of St Mary's Church and in particular its tower is also protected by being within the setting of the listed building. The wording the policy “Development within this area will be discouraged and opposed” appears to me to reflect how the Parish Council, as a statutory consultee on planning applications would wish to comment, rather than being a development plan policy which dictates how a planning application is to be determined either by the local planning authority or a planning inspector on appeal.

The settlement boundary has been moved previously to enable development and so this is not perceived as strong protection necessarily.

Agree that the wording could be revised. Perhaps if “should” replaces “will” then the implication is that all agencies should be acting to protect this area.

18. Should all development in their area be resisted even if it were development appropriate for a countryside setting or did not have an adverse impact on the setting of the church and the prominence in the landscape of its tower. Should the test not be what is the scale of harm arising from the development on the significance of the listed building which is the approach advocated in paragraphs 205 – 208 of the NPPF?

When we talk of the scale of harm it implies that some harm to the setting is acceptable.

The Parish Council would argue that in this particular case any harm would be unacceptable.

Policy ONHP4: Local Green Space

19. Can the Parish Council expand on its reasons why the grass verges particularly on the Miller Way development were identified as being demonstrably special to the local community, as I was struck that other areas of incidental open space were not included, for example the island of open space at the end of Vine Rd?

The grass verges around the Junction of Church Road, Helmingham Road, Chapel Road and

Millers Way collectively contribute to the open nature of what is generally regarded as the central point of Otley Village. Taken together they contribute to the verdant character of the village.

The island of open space in the centre of Vine Road, can be included as Local Green Space.

20. How does the community use the play area at the southeast of Newlands as I did not see any play equipment and it appeared somewhat overgrown?

The land is rented by the Parish Council from East Suffolk Council and the play equipment has been removed by East Suffolk Council some months ago due to safety concerns and there are no known plans for replacement.

It continues to be an area used by locals in that part of Otley Village.

The time of the visit may have contributed to the overgrown nature of the site, as it is cut periodically by a local farmer – April is of course a vigorous period of growth.

Policy ONHP5: Sustainable Construction

21. Can East Suffolk Council indicate whether the requirements to submit an Energy Impact Assessment with a planning application is a requirement of its Local Validation Checklist as required by the Town and Country Planning (Development Management Procedures) Order 2015? Can the Parish Council elaborate on how this Energy Impact Assessment would differ from the Energy Statements that are already required?

Energy Impact Assessment should be aligned with the required Energy Statement. However the Parish Council prefer that it is applied to all developments.

22. Can the Parish Council confirm whether the requirements in b) and c) are expecting applicants to exceed the requirements set out in the Building Regulations, in terms of energy reduction and efficiency?

The intention generally is to encourage rather than dictate but the ever evolving nature of sustainable construction means it is prudent to push for the highest standards.

Policy ONHP6: Green Gaps

23. What is the Parish Councils justification for exempting the village hall from the non-coalescence policy? Is it expected that the redevelopment of the hall would be on the existing hard surface parking areas or is it intended that it could extend into the area which is proposed to be designated as local green space?

The exemption for the village hall which was initially given to provide flexibility will be removed from the plan now that its future has become clearer.

24. Does the Parish Council have a view on whether the policy should identify the green gaps rather than the settlements, where coalescence between the settlement is to be discouraged as proposed by East Suffolk Council in its Regulation 16 comments?

Without identification of settlements there are no gaps to identify. The Parish Council used the term "Green Gaps" to identify the Policy as one about the green gaps. The Map in Appendix D unfortunately used the term "Settlement Gaps" and this went uncorrected. The policy is meant to complement SCLP 10.5 "Settlement Coalescence" by identifying the

Settlements which should not coalesce and the Gaps between them. The point of the Map in App D was to clearly identify the gaps. So one goes hand in hand with the other.

Policy ONHP7: Design Quality

25. I note that the first part of the policy only supports developing proposals that are of high design quality. Has the Parish Council considered providing design guidance, as paragraph 132 of the NPPF suggests, when it states that

“Plans should, at the most appropriate level, set out a clear design vision and expectations so the applicants have as much certainty as possible about what is likely to be acceptable.”

The Parish Council intends to produce a design code or guide, but out of expediency to bring forward the Neighbourhood Plan this has been put to one side and will be taken up in a later revision. It was understood that a design guide was forthcoming from East Suffolk Council and this needs to be taken into account. In the meantime the National Design Guide applies.

27. Can the Parish Council explain the logic of why a scheme of two dwellings is required to provide evidence on the capacity of local infrastructure but two planning applications for single dwellings would not? Is there evidence from the water company that additional homes in the parish currently have an adverse impact on mains water pressure?

The intention is to distinguish between developers and homeowners. There is no firm evidence that additional homes currently in the parish have had an adverse effect on water pressure, however the Policy would seek to avoid this becoming a reality.

The Parish Council notes the reg16 response from the Environment Agency regarding water quality and water resources.

28. Can the Parish Council expand on what type of information it is expecting to see as a result of this policy?

The Parish Council is attempting to encourage high quality design enhancing the Parish character and not degrading the existing character or function of the Parish. Development Plans need to reflect and respect this.

The Parish Council would expect to see high quality, respectful and complementary designs as well as confirmation from utilities that planned development was within capacity as a result of this policy.

Policy ONHP8- Site and Plot Boundaries (Wildlife Corridors and green Boundaries)

29. Is it the Parish Council's intention that the additional requirements should be applied to the local plan allocation site?

All policies apply to all developments. (Except ONHP11 which is specific to the allocation site at Swiss Cottage Farm).

30. Is the Parish Council expecting that wildlife corridors should be within the curtilage of proposed dwellings, for example in meeting the requirements of b)?

It is not an expectation, but it is not in principle a problem if that is the case provided that the purpose of the corridor remains protected.

31. Will this requirement only be effective if a new corridor is linked to existing wildlife corridors or could it be a standalone feature without that connectivity?

Generally a corridor might be expected to connect one space with another by definition.

However, where boundaries are naturally achieved an apparently isolated area is still connected.

Policy ONHP10: Housing Mix

33. What would the Parish Council considered to be “a fair proportion of single storey dwellings”?

The word “fair” is removable but the intention is that a developer should achieve something which is broadly reflective of the current housing mix in Otley Village, unless other needs have been clearly identified beforehand.

34. Is it the Parish Council's expectations that the requirements for the range of affordable housing types should only be sought for schemes below the threshold set out in the local plan? I assume that the percentage of affordable housing tenures will be as set out in Policy SCLP 5.10 of the local plan, unless the Parish Council can point me to evidence of a greater local need and has undertaken a viability assessment of that policy.

The Parish Council does not have evidence of differing Local need compared to that which is set out in SCLP5.10

Policy ONHP11: Land adjacent to Swiss Cottage Farm.

35. Is it the intention of the Parish Council that they had the hedge referenced in a) should also act as the wildlife corridor required by Policy ONHP8 and can that buffer be placed on the farmland outside the allocation site, there by maximising the development potential of the allocation site?

Yes, the screening hedge can be part of a wildlife corridor. As far as the Parish Council is concerned the screening/corridor to the east could be provided outside the allocation site. However on advice from East Suffolk Council this is not stated in the Neighbourhood Plan because it lies outside the allocation.

36. Can the Parish Council confirm whether the requirements set out in the policy are additional to or replace the requirements of Policy SCLP 12.58 of the local plan?

The Policy is intended to complement and add to SCLP12.58 not replace any part of it.

37. Does the Parish Council have a view on whether the limit of two storey housing could also include rooms constructed within the roof space?

In principle the Parish Council is not wholly against construction in the roof space. This is an area that the design code would address. Particularly in regard to positioning, style and sizing of windows in the roof space.

38. Does the Parish Council have review whether the local plan’s allocation of the site for approximately 60 dwellings would allow a scheme to the meet to the requirements set out in i)?

The Parish Council seeks to preserve and protect the character of Otley Village. i) states “as far as reasonable practicable”. It is debatable whether the allocation and its implied density or the requirements would be the limiting factor.

Policy ONHP13: Transport and Traffic

41. Can the Parish Council illustrate for my understanding, how a small residential scheme will be expected to improve accessibility to local facilities and what would the Parish Council expect a new development to provide to meet the requirements of d) ?

The Parish Council would expect to see a well-designed scheme involving appropriately designed footpaths throughout, connecting to the existing footpaths in the village, thereby providing access to the village facilities.

Policy ONHP15: Further Education

42. Is the term “expansion of Suffolk Rural” meant to mean new developments which enable an increase in student numbers at the college or is it any increase in the building footprint of the college?

Both

43. Do buses currently serving the college stop at the village?

Service 118 from Ipswich stops at college before the village. The main bus traffic to the college for students are private contract and do not stop in Otley Village.

Concluding Remarks

45. I would also request that copies of this note and the respective responses are placed on the Neighbourhood Plan’s and District Council’s respective websites.

This has been done.

East Suffolk Council comments on Otley Neighbourhood Plan Regulation 16 draft.

Section/Policy	Comments	Otley Parish Council Response
OHNP1 (Ecology and Biodiversity)	<p>e) It does not appear that a viability assessment has been carried out regarding the 20% BNG expectation. Without such an assessment it cannot be concluded that the policy expectation would not adversely impact Local Plan policy including the deliverability of the SCLP12.58 allocation. Paragraph 006 Reference 74-006-20240214 of the PPG states that where a Plan goes beyond 10% it needs to be justified/evidenced and consider the impact on viability for development.</p> <p>c) Also, it would be beneficial if the 5 priority habitats stated within the policy are clarified to mean in accordance with the Otley Neighbourhood Plan Landscape and Wildlife Evaluation (2019)</p> <p>Last sentence: states that where clearing has taken place prior to an application it will be resisted. Whilst it's important that ecological and biodiversity land value of land prior to clearing is accounted for, an application should not be resisted in all instances particularly where the ecological and biodiversity value was low, or the application shows gains in this area.</p>	<p>It is correct that it cannot be concluded that the policy would not adversely impact local plan policy. However it is equally correct that it cannot be concluded that it will.</p> <p>As a part greenfield and part brownfield site it might be concluded that increasing BNG starts from a low baseline.</p> <p>Specifying the 5 priority habitats in c) is agreed and should clarify.</p> <p>This is not the intention.</p>
ONHP2 (Landscape and Amenity)	The policy states that, 'New development must'. The 'must' should be replaced by 'should'.	Agreed.

ONHP4 (Local Green Space)	<p>All Local Green Space should be robustly justified (often utilising a separate evidence document) against the criteria outlined in paragraph 107 of the NPPF and we can see additional justification has been added to the regulation 16 version of the plan since the regulation 14 version was published. However, East Suffolk Council would still question whether sufficient justification has been given for designating Millers Way Grass Verge (d) as a local green space as it is less clear compared to other listed Local Green Spaces within the plan what is demonstrably special to a local community and what is the particular local significance for this land.</p>	What kind of evidence over and above that provided is required?
ONHP5 (Sustainable Construction)	<p>Criterion b) requires that all new dwellings and workplaces include proposals for on-site renewable energy. It is our understanding that building regs currently requires this in most, but not all cases. Where a neighbourhood plan policy goes above the building regs requirements a viability assessment should be carried out. This would ensure that it does not unacceptably affect the viability of the Local Plan policy including the deliverability of the SCLP12.58 allocation. Perhaps this could be resolved if the word 'Shall' is softened.</p> <p>c) For clarity the supporting text should provide an explanation on what an Energy Impact Assessment includes. We would question whether it bears relation to the Energy Statements found within the East Suffolk Local Validation Check List.</p>	<p>It is new information that a Neighbourhood Plan going beyond an existing standard must provide a viability assessment, however we agree that "shall" could be "should"</p> <p>Agree that this should be aligned with Energy Statements.</p>

	<p>The aim of an energy statement is to demonstrate how the proposed development would be sustainably constructed in a manner that ensures energy efficiency of the scheme and also comply with relevant planning policy relating to such matters. It bears some similarity with the Energy Impact Assessment which the policy states should demonstrate how energy reduction or efficiency measures are incorporated into the design.</p>	
ONHP6 (Green Gaps)	<p>This policy is considered to present no issues of general conformity. This view is based on the interpretation of the policy that coalescence means to join rather than encroach. As such the policy allows for development in the identified green gaps so long as the green gaps are not entirely lost. If the policy were interpreted to restrict all development in the green gaps this would be a general conformity issue as it would override the SCLP exception site policies (SCLP5.4 and 5.11). The green gaps policy should not restrict sustainable development that would be otherwise acceptable in the Local Plan.</p> <p>The map aims to show what the neighbourhood plan considers distinct settlements across the parish, with the policy covering all gaps between them. We would suggest reversing the policy to define and plot the important gaps (as opposed to the settlements) and to provide a clear evidenced rationale to why these gaps are important and why the 'openness' of the landscape is needed.</p>	<p>There is no conformity issue with the intent of the policy.</p> <p>Answered in response to Inspector.</p>

ONHP7 (Design Quality)	<p>All responses to a planning application are carefully considered during the determination of an application so it is unclear what criterion F is practically achieving. The decision maker can only consider planning matters when determining an application and it is unclear whether the parish council would introduce non- planning matters at this stage.</p> <p>Criterion C should be amended to refer to overlooking that is significantly detrimental to the amenity of neighbouring properties as opposed to all overlooking.</p> <p>Final paragraph – It would be useful for the supporting text to detail the type of evidence required to meet this requirement. This final paragraph is adding additional requirements for the applicant, but it's not clear how this can be evidenced and assessed.</p>	<p>The Parish Council are seeking to promote high quality design at every stage and particular developments might garner further input which the Parish Council would like to be taken into account.</p> <p>The Parish Council takes the view that overlooking can be avoided with good design.</p> <p>Answer provided in response to Inspector.</p>
ONHP8 (Site and Plot Boundaries (Wildlife Corridors and Green Boundaries))	<p>We consider that evidence would be important to underpin a requirement for hedging between residential properties.</p> <p>As a minor note from the opening line of the policy there may be a contradiction between preserving the verdant nature of the village and the perception of openness as significant hedge planting can have an enclosing effect.</p> <p>It is unclear whether this policy requirement applies to the Local Plan allocation in addition to the requirements of policy ONHP11. If this policy applies to the allocation, it is important that the policy should enhance the allocation and not reduce its deliverability. Whilst we do</p>	<p>What evidence?</p> <p>We do say "wherever possible"</p> <p>The openness can be provided through street facing open design.</p> <p>Where properties would in any case be divided by or bounded by a dividing feature such as in a rear garden where privacy is important then it is preferable that this boundary is natural.</p> <p>This approach and policy applies throughout the Plan.</p>

	<p>not believe the requirements will jeopardise the allocation delivery no assessment of the delivery implications of the policy requirements on allocation SCLP12.58 has been carried out by the Parish Council so it's not possible to fully make this judgement. Consideration should be given to whether this policy should apply to the Local Plan allocation which is covered by its own policy (ONHP11) anyway.</p>	
ONHP10 (Housing Mix)	<p>Criterion C) It would be useful to have guidance as to how 'fair' proportion can be determined. Criterion f) first homes could now be removed due to recent changes to the NPPF.</p>	<p>Answered in response to Inspector</p>
4.6.3.1 (Housing Types)	<p>Consider adding reference to policy SCLP5.8: Housing Mix within this section of the plan. SCLP5.8 sets out the approach to housing mix based on the identified need within the Strategic Housing Market Assessment, or latest equivalent whilst also considering site size, characteristics and location.</p>	<p>Reference can be added.</p>
4.6.4.3	<p>This text came from ESC as a rough guidance to densities and was not robustly calculated. It was not provided with the understanding it would be directly used in the Neighbourhood Plan. Accordingly, we would recommend that caveats are included that states that these figures were indicative only and should be seen as context to the Neighbourhood area rather than informing new development. Particular reference can be given to the allocated site which is not</p>	<p>This same information has been calculated independently by the Parish Council, it is not clear what would make it more robust. It is not included in Policy as it is indeed for reference and indicative of existing context.</p>

	expected to come forward with the same densities as the sites quoted.	
4.6.4.4	This paragraph is not needed as it is repeating what is set out in Policy SCLP12.58. Additionally, this section is within the supporting text, however it reads as policy requirement.	It is not a Policy and is clearly not. It is provided for context for those not familiar with the Local Plan but who have an interest in the Neighbourhood Plan.
ONHP11 (Land Adjacent to Swiss Cottage Farm)	<p>Criterion h) The policy restricts new dwellings to no more than 2 storey and this is consistent with the character of the village detailed within the Neighbourhood Plan, but could 2.5 storey dwellings be acceptable where the massing and scale of the dwelling is not significantly different from a 2 storey building?</p> <p>Criterion I) It is likely that the Swiss Cottage development will be at a higher density than many nearby sites, but higher density developments can be acceptable provided they are well designed. There is a concern that the text under 4.6.4.3 which was not robustly evidenced and was provided for context could be used as a reason to refuse otherwise acceptable schemes.</p>	<p>Answered in response to inspector.</p> <p>Hence the parish Councils focus on design quality.</p>
Appendix F	<p>Appendix F – the plan states a 7-metre buffer strip which is very prescriptive, and it is unclear why 7 meters is needed. Having large ‘buffer’ areas removes developable land within the allocation so needs a clear rationale.</p> <p>Any criterion within the Neighbourhood Plan should seek to enhance the existing policy and should not jeopardise its delivery otherwise it comes into conflict with the Local Plan. It is our view that most of the criterion</p>	<p>This could be made clearer in the Policy itself. In the view of the Parish Council it is clearly explained in Appendix F.</p> <p>For further clarity:</p> <p>The ditch is to be retained and is 3m wide. The Public footpath is to be retained to a width of 1.8m (which is understood to be standard) A natural hedgerow is to be used as the boundary and this is assumed to require roughly 2m to be allowed to</p>

	<p>does do this, but we would question the elements above. It is understood from the annual Statement of Housing Land Supply that the site is unlikely to come forward in the next 5 years, but it is still important to engage positively with the policy and where appropriate engage with the landowner. From the consultation statement it is not clear what the extent of the engagement with this landowner is.</p>	<p>grow without encroaching on the footpath.</p> <p>This comes to 6.8m so 7m was entered into the Plan.</p> <p>Engagement with the Landowner has been limited as the land is held in trust by the wider family of the Farmer currently working it. Has ESC had some more significant engagement?</p>
ONHP12 (Business and Commercial)	Suggest deleting the words 'of small scale'.	Suggestion noted.
ONHP13 (Transport and Traffic)	<p>For the avoidance of doubt, ESC is of the view that this policy is in general conformity with the SCLP, and in particular with policy SCLP7.1. While criterion c) is a strong requirement, it is consistent with SCLP7.1g)</p> <p>"Development will be supported where... it... does not reduce road safety".</p> <p>However, the language may be inconsistent with NPPF (severe highway impacts)</p>	Noted.
OHNP14 (Provision for Car Parking)	<p>The principle of setting different parking requirements to those set out in the Suffolk Guidance for Parking is accepted, so long as the requirements are appropriately evidenced and do not stray too far from the Suffolk requirements.</p> <p>To ensure the policy remains up to date for as long as possible, it is recommended that criterion i) be amended to correctly refer to the Suffolk Guidance for Parking (2023), and ensure any subsequent versions of the Suffolk Guidance for Parking (2023) are referenced.</p>	Noted.

	Criterion i) could read: “Except as specified in policy ONHP14 points (a) to (h) the provisions of the Suffolk Guidance for Parking Standards (2023), and any subsequent versions, shall be deemed to be incorporated in Policy ONHP14.”	Noted – will action wording change.
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Reg16 response from P Sweet

Policy ONHP1 - Support 20% BNG requirement and reconnecting the ecological network.

Figure 4-1 and Appendix C - Please include significant views of Otley Church i) from the B1078 Ashbocking Road looking north-east, and ii) from Viewpoint 2, looking west.

Policy ONHP3 - Protection of the setting of the church needs to be strengthened - 'will not be permitted' instead of 'will be discouraged'.

The specific Views are not intended to be protected as such it is the overall setting and character which the Parish Council seeks to protect.

The Parish Council previously sought to “not permit” however this is not in the gift of the Parish Council or Neighbourhood Plan.

Policy ONHP10 - Support the sentiment but concerned as to how 'fair' proportions will be interpreted and agreed. Could it say instead, reflective of the village's current demographic profile and/or identified needs? [See response to inspector.](#)

Policy ONHP13 - All development should demonstrate no negative impact on road safety, not just major ones. Emphasis is needed on design of streets and access to prioritise use by and the safety of children, pedestrians and cyclists.

Policy ONHP14 - concerned about the message that raised parking standards sends about sustainable transport and compatibility with roads and streets which prioritise walking and cycling. Perhaps these could be advisory with the County standards (which set out minimum provision) still the baseline? There is no mention of requiring travel plans for larger developments, nor of designing car parking in such a way that it does not dominate the development visually. Would prefer a stronger emphasis on walking, cycling, and public transport as the first consideration, please.

Due to the lack of public transport and the risks in cycling and walking on country lanes it is a pragmatic approach to plan for the existence of vehicles whether they be EV or ICE powered and therefore Parking provision remains important.

General point - all new development should aim to create a genuine sense of place and distinctiveness for Otley - good design that creates a memorable and attractive place.

Reg 16 response from Suffolk County Council

Natural Environment

Policy ONHP1 – Ecology and Biodiversity

Whilst not strictly a Basic Conditions matter, within SCC's response to the pre- submission (Regulation 14) consultation stage, it was suggested to replace the second word 'to' with 'which'. To this the Parish responded that "Policy ONHP1 has been revised". SCC queries why the submission version of the plan does not include this amendment that the Parish agreed to include.

[Policy ONHP1 was revised as stated but not including this suggested change.](#)

Policy ONHP4 - Local Green Space

Within SCC's response to the pre-submission (Regulation 14) consultation stage concern was raised about the inclusion of verges into Local Green Space designations and SCC did not consider that the evidence provided is strong enough to justify this. As listed in paragraph 4.4.3 and Policy ONHP4, this is regarding:

- c) The wide verge at the junction of Chapel Road and Church / Helmingham Road and extending along east side of Church Road; and
- d) The grass verges and landscaping areas at the entrance to Millers Way at the junction with Church/Helmingham Road

It is understood that the Parish council wishes to keep these designations to protect the setting of the War Memorial and give a "village green feel to the centre of the village". Further text had been added to this policy stating that "Proposal for development with these spaces will only be supported in Very Special Circumstance", but this is not lenient enough for SCC, as the Highway Authority, to carry out its duty to ensure that roads are maintained and safe.

The county council is concerned that, should there be a need to undertake highway works that affect the verges included in these allocations, there may be local opposition to such works from the perceived damage to a protected green space, even though undertaken by (or on behalf of) the Highway Authority and permitted development.

[The council has a right to carry out works under "National Permitted Development right" which is unaffected by this designation because they are verges next to the highway. Utility providers enjoy the same rights. The Parish Council does not see the designation of Local Green Space as a barrier to the needs of SCC or utilities.](#)

As previously stated in SCC's response at Regulation 14 stage, it is also not clear how highways verges meet the criteria of paragraph 106 of the NPPF (2023) of being "demonstrably special" or of "particular local significance". The Parish has provided no further justification or evidence other than stating in paragraphs 4.4.7 and 4.4.8 that they are "demonstrably special to the local community, holds particular significance".

SCC recommends these designations are removed as Local Green Spaces to accord with Basic

Condition C. As already suggested in the Regulation 14 response, they could be appropriately protected through incorporation into policy ONHP1 Ecology and Biodiversity and/or Policy ONHP2 Landscape and Amenity, which would protect the verges, while still enabling necessary highway or statutory works to be carried out, when required.

[The Parish Council understands that the Local Green Spaces meet the criteria under NPPF.](#)

It is also noted that there are no sizes stated for the proposed Local Green Spaces. This should be provided to ensure that each site meets the criteria of not being an “extensive tract of land” as per paragraph 106 of the NPPF (2023).

[The Parish Council cannot see where in NPPF the requirement for specific size is stated in the NPPF other than that a Local Green Space should not be “an extensive tract of land”. These designated spaces are not extensive and the Parish Council understands them to be within the criteria set out in NPPF.](#)

Policy ONHP6 – Green Gaps

Within SCC’s response to the pre-submission (Regulation 14) consultation stage it was recommended that instead of “Green Gaps” the policy should refer to the term “Settlement Gaps” as this is the terminology typically used for planning purposes, and is found in many recent adopted Neighbourhood Plans. The Parish has reasoned that the term “Green Gaps” is “retained to avoid confusion with settlement boundaries” however this is not an issue that is likely to occur because both Settlement Boundary and Settlement Gaps are clearly defined planning terms. The county council believes that it would be the term “Green Gaps” which would cause confusion because it is not used in any other Neighbourhood Plans, and is not defined planning terminology.

[See response to Inspector.](#)

Additionally, in both Appendix D - Map of distinct settlements across the Parish and Appendix K – Policies Map the keys refer to Settlement Gaps so this term should be reflected throughout the plan and its policies for continuity, clarity and to accord with Basic Condition C.

Policy ONHP8 – Site and Plot boundaries

In relation to criterion e, SCC would reiterate that while wildlife corridors can sometimes provide screening, this is not their primary function. The Parish has responded that the policy has been revised to address the issues raised, but criterion e remains unchanged.

[The Parish Council changed a number of elements in this Policy after SCC responses. SCC did not suggest a change to e\) previously.](#)

Annex 2: Glossary in the NPPF (2023) defines Wildlife Corridors as “Areas of habitat connecting wildlife populations”, therefore screening is not an envisioned function and should not be a required criteria for wildlife corridors when designing new development. The International Union for Conservation of Nature¹ defines Wildlife Corridor as "a land or water bridge, usually linear in form, that facilitates the movement of individuals between fragmented habitats". Therefore, screening trees and/or hedges are not a defined requirement, especially as wildlife corridors can be waterways.

The Parish Council believes that the lack of vision that wildlife corridors can provide a screen in certain circumstances is not a valid reason to have no ambition in that regard. Otley Parish Council would like developers to have both vision and ambition in this.

This policy stipulation may make it more difficult for wildlife corridors to be implemented if they cannot provide enough screening. This difficulty of implementing wildlife corridors could hinder sustainable development and thus the plan would not be in accordance with Basic Condition B.

The amount of screening is not stipulated.

The policy wording should be revised to provide more leniency for screening, as follows.

“New developments shall:

[...]

e) Provide a wildlife corridor, which ~~shall be~~ would be supported when planted with native mixed hedges and trees ~~to which can~~ provide visual screening of the new development from the existing developments;”

This changes the meaning and softens the requirement.

Transport

Policy ONHP12 – Business and Commercial

Within SCC’s response to the pre-submission (Regulation 14) consultation stage it was noted that in relation to criterion c:

SCC as Local Highway Authority would expect an appropriate Transport Note or Transport Statement to accompany any proposal that may significantly impact upon the local highway network.

The Parish has responded that “Impact statements and traffic assessments included in policy”. However, SCC notes that a transport statement and an impact statement are not the same thing. Likewise, these are both different to a transport note or a traffic assessment. It is not suitable for these terms to be used interchangeably.

The terms are caveated with the line “where necessary as required by the planning process”.

General

The references in Policy ONHP4 that states “as set out in paragraph 4.4.2” is incorrect should be updated to refer to paragraph 4.4.3.

4.4.2 provides the criteria for designating Local Green Space and this is why it is referenced.

Reg16 response from Suffolk Wildlife Trust

The Parish Council notes the very strong support from Suffolk Wildlife Trust for 20% BNG delivery.