



Otley Neighbourhood Plan Referendum

Summary of Representations

This document contains summaries of the representations made in response to the consultation on the Submission Otley Neighbourhood Plan which was held between 26th February and 9th April 2025. The representations were submitted to the Examiner for consideration during the Examination of the Otley Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/otley-neighbourhood-area/>

Respondent	Summary
East Suffolk Council	<p>East Suffolk Council supports the Otley Neighbourhood Plan and it is considered that overall, it complements the Suffolk Coastal Local Plan. There are some outstanding matters and amendments. Comments about the submission document are set out below.</p> <p>The comments below require further consideration during the examination.</p> <p>OHNP1 (Ecology and Biodiversity) Stated that a viability assessment had not been carried out regarding the 20% BNG expectation and without such an assessment it cannot be concluded that the policy expectation would not adversely impact Local Plan policy including the deliverability of the allocation.</p> <p>In addition, it is stated that it would be beneficial if the 5 priority habitats stated within the policy are clarified. Furthermore, the final sentence should be adjusted as the broad approach to refusing all applications that had experienced land clearing is too constrictive.</p> <p>ONHP2 (Landscape and Amenity) Stated that a 'must' should be replaced by 'should'.</p> <p>ONHP4 (Local Green Space)</p>

	<p>Stated that all Local Green Space should be robustly justified, and it was believed the justification wasn't sufficient in relation to the Millers Way Grass Verge allocation.</p> <p>ONHP5 (Sustainable Construction) Stated that 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. Suggested this concern could be resolved if the word 'Shall' is softened.</p> <p>In addition, a request was made for further clarity in regard to what an Energy Impact Assessment includes.</p> <p>ONHP6 (Green Gaps) Stated that this policy is considered to present no issues of general conformity based on the interpretation of the policy that coalescence means to join rather than encroach. However, if the interpretation is different to that, then potentially there is an issue with general conformity.</p> <p>In addition, it was suggested that the map is reversed so the gaps between the 'distinct settlement' groups is plotted as opposed to the distinct settlement groups.</p> <p>ONHP7 (Design Quality) Questioned what criterion F is practically achieving as the decision maker can only consider planning matters when determining an application and it is unclear whether the parish council introduce non-planning matters at this stage.</p> <p>In addition, it is stated that criterion C should be amended to relate to significant overlooking.</p> <p>Stated it would be useful for the supporting text to detail the type of evidence required to meet this requirement.</p> <p>ONHP8 (Site and Plot Boundaries (Wildlife Corridors and Green Boundaries)) Stated that evidence would be important to underpin a requirement for hedging between residential properties.</p> <p>Also highlighted a minor potential contradiction in the policy.</p> <p>Stated it is unclear whether this policy requirement applies to the Local Plan allocation in addition to the requirements of</p>
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	<p>policy ONHP11. The requirements should not damage the deliverability of the allocation.</p> <p>ONHP10 (Housing Mix) Stated it would be useful to have guidance as to how 'fair' proportion can be determined in criterion c. First homes could now be removed due to recent changes to the NPPF in criterion f.</p> <p>4.6.3.1 Recommended adding reference to policy SCLP5.8: Housing Mix within this section of the plan.</p> <p>4.6.4.3 Requested caveats as 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.</p> <p>4.6.4.4 Stated that the text was repeated and not required.</p> <p>ONHP11 (Land Adjacent to Swiss Cottage Farm) Stated that the policy restricts development to a maximum of 2 storey dwellings but questioned whether 2.5 storey could be acceptable.</p> <p>In addition, criterion I was questioned as it requires densities to correlate with the larger village, but higher density developments can be acceptable.</p> <p>Also questioned whether the 7-metre buffer strip is needed as it removes significant developable land.</p> <p>Overall, the response stated that the policy should enhance the existing policy, including the allocation and not restrict it.</p> <p>ONHP12 (Business and Commercial) Suggested deleting the words 'of small scale'.</p> <p>ONHP13 (Transport and Traffic) Noted that whilst the policy is broadly in conformity with Local Plan policy some of the language is inconsistent with the NPPF.</p> <p>OHNP14 (Provision for Car Parking) Noted different parking requirements in Neighbourhood Plans to the Suffolk Guidance is acceptable if appropriately</p>
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	<p>evidenced. Other changes to the text were suggested to ensure the correct title of the guidance is referred to and that the text covers subsequent amendments to the Suffolk Guidance.</p> <p>1.1.1, 1.4.3 and 1.3.2 Suggested adding 'The'</p> <p>1.7.4.1 Suggested amendments to the text</p> <p>1.9 Suggested amendments to the text</p> <p>Figures The figure number associated with images and plans do not appear in consecutive numerical order.</p> <p>4.4.4 Suggested removal of capital letters.</p> <p>Policy ONHP14 Provision for Car Parking Suggested the policy title could remove the word 'car' as it also covers cycle parking.</p> <p>Appendix C Stated that key features of each view must be set out somewhere in the Plan. The explanation of the key features of each important view would perhaps most logically be located in Appendix C</p>
Environment Agency	<p>The response highlighted environmental constraints stating that large scale development over the plan period may impact on the available permit discharge head room.</p> <p>Stated that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. If development is steered away from these areas, they do not consider there to be potential significant environmental effects. Nevertheless, they recommend inclusion of a policy on flood risk.</p> <p>Furthermore, they state that new developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. They recommended checking the capacity of available water supplies with the water company, in line with the emerging 2024 Water</p>

	<p>Resources Management Plan which is due to be published in 2023.</p> <p>They also state that development should meet the highest levels of water efficiency standards and Neighbourhood Plans can exceed building regulation requirements. They highlight that developments that require their own abstraction over a certain capacity will require an abstraction licence.</p> <p>They state that the plan includes areas which are located on Source Protection Zone 3 which should be considered within the plan if growth or development is proposed here.</p> <p>They encourage the neighbourhood plan to seek ways to improve the local environment.</p>
Historic England	Historic England did not provide any detailed comments on the Otley Neighbourhood Plan.
Natural England	Natural England did not have any specific comments on the draft neighbourhood plan, but did refer to an annex: Neighbourhood planning and the natural environment: information, issues and opportunities.
P Sweet	<p>Policy ONHP1 Supported the BNG requirement and reconnecting the ecological network</p> <p>Figure 4-1 and Appendix C Requested the inclusion of further views.</p> <p>Policy ONHP3 Stated that the protection of the setting of the church needs to be strengthened.</p> <p>Policy ONHP10 Questioned how 'fair' proportions will be interpreted and agreed and suggested alternative wording.</p> <p>Policy ONHP13 Stated that all development should demonstrate no negative impact on road safety, not just major ones and further emphasised the needs of safety of children, pedestrians and cyclists.</p> <p>Policy ONHP14 Raised concerns that the proposed parking standards sent the wrong message by prioritising cars over active travel before suggesting possible resolution. Also stated there is no mention of travel plans in the policy.</p>

	<p>General point</p> <p>Raised a general point that new development should aim to create a genuine sense of place and distinctiveness</p>
Suffolk County Council	<p>Suffolk County Council welcomed the changes made to the plan in response to comments made at the Reg. 14 pre- submission consultation stage.</p> <p>They stated that as this was the submission draft of the Plan the response focused on matters related to the Basic Conditions the plan needs to meet to proceed to referendum.</p> <p>Policy ONHP1 – Ecology and Biodiversity</p> <p>They suggested replacing a word during the Regulation 14 consultation. The Parish stated that this had been addressed but they question why this is reflected in the submission version.</p> <p>Policy ONHP4 - Local Green Space</p> <p>Further to the regulation 14 consultation they raised concerns about the inclusion of verges into Local Green Space designations and did not consider that the evidence provided is strong enough to justify this.</p> <p>They recognise wording has been added, but they retain their concern stating that the designation may hinder their ability to perform statutory duties including maintenance. They state that the new wording still does not provide the justification or evidence for the Local Green Space inclusion and therefore concluded by recommending they are removed.</p> <p>Finally, they note no sizes for the Green Spaces are included which they state should be provided.</p> <p>Policy ONHP6 – Green Gaps</p> <p>They state further to the regulation 14 response that “Green Gaps” should instead refer to the term “Settlement Gaps” as the term is not widely used or is a defined planning term.</p> <p>They also note that the maps in appendix d and k use inconsistent phrasing.</p> <p>Policy ONHP8 – Site and Plot boundaries</p> <p>They state that the primary function of a wildlife corridor is not to provide screening. Whilst the parish responded to say this point had been addressed, criterion e remains unchanged.</p>

	<p>They point to the glossary within the NPPF with a definition of wildlife corridors.</p> <p>They state that potentially the policy may make wildlife corridors harder to implement if screening is a requirement and suggest alternative wording.</p> <p>Policy ONHP12 – Business and Commercial They state the parish had attempted to address their concerns from the regulation 14 comment, but have used different and inconsistent terminology.</p> <p>General Notes that Policy ONHP4 that states “as set out in paragraph 4.4.2” is incorrect should be updated to refer to paragraph 4.4.3.</p>
Suffolk Wildlife Trust	<p>Suffolk Wildlife Trust are pleased that the plan recognises the importance of biodiversity and greenspaces and proposes measures to protect and enhance these within Plan Policies. They specifically support the plans higher BNG requirements.</p> <p>Policy ONHP 1: Ecology and Biodiversity They are happy to see detailed definition of important ecological features within the parish which will have been clearly identified.</p> <p>They point to East Suffolk Council have published draft guidance which shows Neighbourhood Plans can provide higher BNG requirements. They point to the Hadleigh Neighbourhood Plan as an example of this occurring.</p> <p>Policy ONHP2: Landscape and Amenity Supports criterion a</p> <p>Policy ONHP4: Local Green Space States that policy suitably identifies greenspaces and they support the policy.</p> <p>Appendix: Evidence to support and justify aspiration for 20% BNG within Policy ONHP1 They highlight different evidence sources and reports that could support the greater BNG requirements.</p>