



# OTLEY NEIGHBOURHOOD PLAN

## CONSULTATION STATEMENT

The Neighbourhood Planning (General) Regulations 2012 Provision 15 (2)

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## Decision to develop a Neighbourhood Plan

1. At a public consultation in Otley Village Hall on 3<sup>rd</sup> September 2018 in relation to the then Suffolk Coastal Local Plan “call for sites”, it was suggested that the parish prepare a Neighbourhood Plan in order to help control development within the parish. Residents of the parish were invited to make known their interest in helping to develop a Neighbourhood Plan.
2. At a Parish Council Meeting on 19<sup>th</sup> November 2018 the decision was made begin the process of developing a Neighbourhood Plan for Otley Parish
3. In January 2019 a formal invitation to form a Neighbourhood Plan group was made to residents who had expressed a willingness to participate.
4. The Neighbourhood Plan group met for the first time on 18th March 2019. Eight persons initially responded to the invitation and attended the first meeting

## Process of Consultation with Otley parish residents in order to gather opinion and information to develop a Neighbourhood Plan

1. Publicising the opportunity to develop a Neighbourhood Plan to the people who live, work and run businesses in Otley parish.

The opportunity was publicised by a leaflet drop to all houses & businesses in the Parish on during 26<sup>th</sup> August 2019 to 1<sup>st</sup> September 2019.

The leaflets explained the purpose of the Neighbourhood Plan and that a questionnaire would be forthcoming in September 2019 inviting responses from all in the parish to inform the development of the Neighbourhood Plan.

A dedicated e-mail address was set up along with a phone number.

Facebook pages for the village and Parish Council also publicised the consultation period and the consultation event.

2. The Questionnaire.

The questionnaire was developed over a number of weeks by the Neighbourhood Plan group.

Once approved by the Parish Council it was distributed to all addresses in the Parish between 9<sup>th</sup> to 15<sup>th</sup> September, responses were collected during the week commencing 11<sup>th</sup> November 2019. All residents had the opportunity to fill out a questionnaire which allowed for multiple submissions from different persons in the same household. There were 264 responses to the questionnaire representing around 47% of households in Otley.

The questionnaire feedback data was collated and compiled for presentation during December 2019 to February 2020.

3. Consultation event in the Village Hall on 7<sup>th</sup> March 2020 – 10am to 3pm

The leaflets distributed to all addresses in the parish publicised the consultation event at the Village Hall, which was rented for the day.

Large scale prints of The data collected and analysed from the questionnaire were pinned to display boards. Feedback forms were made available as well as chairs and tables and pens to make it easy for residents to fill them in. Tea, coffee and biscuits were provided.

A table with pictures taken throughout the parish was laid out to gather information about which views or characteristics the parishioners understood to be of importance to the parish, further suggestions not included in the pictures were also invited.

A Health and Safety assessment for the event was undertaken and recorded.

The number of attendees was recorded as 54.

4. Feedback forms

Customised printed feedback forms were available at the consultation event. Forms were returned to a box in the village store and at the consultation event in the Village Hall. There was also a dedicated e-mail address to receive comments.

47 feedback forms or e-mails were received with comments.

5. Post consultation analysis of responses.

Once the consultation event had ended, the responses were summarized in an anonymous document and the Neighbourhood Plan team met to discuss which were relevant to the plan and could be included, and which were issues for Parish and District Councils.

[Link to video of event on Parish Council Website.](#)

## Process of Consultation with East Suffolk Council in order to receive support and guidance on the development of a Neighbourhood Plan

1. Consultation with East Suffolk Council Planning Department:

During the course of the development of the Otley Neighbourhood Plan a number of meetings and consultations were made between the Otley Neighbourhood Plan Group and East Suffolk Council Planning Department starting in February 2020.

These meetings were mostly held remotely.

East Suffolk Council also gave formal feedback on the content of the Otley Neighbourhood Plan as it was developing giving feedback on the first draft in March 2021.

East Suffolk Council gave regular feedback and support throughout the process.

The support and feedback from East Suffolk Council was critical in guiding and developing a compliant Neighbourhood Plan.

## Consultation with Ben Norton (Norton Taylor Nunn) in order to receive support and guidance on the development of a Neighbourhood Plan.

1. Consultation with Ben Norton (Norton Taylor Nunn):

In order to support the Otley Neighbourhood Plan Group with specific experience and knowledge in order to reach a final effective and compliant version of the Neighbourhood Plan external expertise was consulted in September 2023.

## Process of Consultation to publicise and receive comment on Otley Neighbourhood Plan draft under regulation 14 of The Neighbourhood Planning (General) Regulations 2012.

1. Publicising the Draft Neighbourhood Plan to the people who live, work and run businesses in Otley.

The consultation was publicised by a leaflet drop to all houses & businesses in the Parish on 5<sup>th</sup>, 6<sup>th</sup> & 7<sup>th</sup> January 2024. The leaflets explained how to access the draft plan, that there would be a chance to view and ask questions in the Village Hall on 13<sup>th</sup> January, and how to make comments. Leaflets were also posted in the village shop and parish notice board, pub, doctors surgery and shop.

A dedicated e-mail address was set up along with a phone number.

Facebook pages for the village and Parish Council also publicised the consultation period and the consultation event.

Consultation period was from 8<sup>th</sup> January 2024 to 26<sup>th</sup> February 2024.

The draft plan, and ways in which residents could contact the Neighbourhood Plan group for further comment or more information were made available on the parish council website <http://otley.onesuffolk.net/neighbourhood-plan/>

2. Consultation event in the Village Hall on 13<sup>th</sup> January 2024 – 10am to 3pm

The leaflets publicised the consultation event at the Village Hall, which was rented for the day. A sandwich board sign highlighted the event on the day.

Large scale prints of each page of the draft Neighbourhood Plan document were pinned to display boards. Feedback forms were made available as well as chairs and tables and pens to make it easy for residents to fill them in. Tea, coffee and biscuits were provided.

Bound hard copies of the Neighbourhood Plan draft were made available for villagers to take home to read if preferred.

A Health and Safety assessment for the event was undertaken and recorded.

On arrival people were introduced to the concept of the Neighbourhood Plan and shown the direction to navigate the boards. Members of the Neighbourhood Plan team were on hand to answer question. A video was taken to record the exhibition.

There were 64 attendees.

Consultation period was from 8<sup>th</sup> January 2024 to 26<sup>th</sup> February 2024.

3. Feedback forms

Customised printed feedback forms were available at the consultation event, and in the village store. Forms were returned to a box in the village store and at the consultation event in the Village Hall. There was also a dedicated e-mail address to receive comments.

25 feedback forms or e-mails were received with comments.

4. Post consultation analysis of responses from parish.

Once the consultation period had ended on 26<sup>th</sup> February, the responses were summarized in an anonymous document and the Neighbourhood Plan team met to discuss which were relevant to the plan and could be included, and which were issues for Parish and District Councils. A list was formulated to be discussed with the planning consultant advising the team. The responses were scanned into a computer file for record purposes, and a thank you e-mail was sent to all respondents.

5. Publicising the Draft Neighbourhood Plan to required public bodies

The requirement to consult with a number of public bodies under regulation 14 of The Neighbourhood Planning (General) Regulations 2012 was carried out between 4<sup>th</sup> March and 15<sup>th</sup> May 2024.

6. Post consultation analysis of responses from public bodies

Once the consultation period had ended on 15<sup>th</sup> May 2024, the responses were summarized in an anonymous document and the Neighbourhood Plan team met to discuss which were relevant to the plan and could be included, and which were issues for Parish and District Councils. A list was formulated to be discussed with the planning consultant advising the team. The responses were scanned into a computer file for record purposes, and a thank you e-mail was sent to all respondents.

## Process of delivery of the final version of Otley Neighbourhood Plan for inspection

1. Consultation with Ben Norton (Norton Taylor Nunn):

After taking into account the responses from residents and public bodies the Neighbourhood Plan was referred to external consultants for verification.

Statement of compliance.

2. Delivery of final version of Neighbourhood Plan to the people who live, work and run businesses in Otley.

## Addendum: Consultation documents for Otley Neighbourhood Plan

- A1. 2019 Introductory leaflet prior to development of plan
- A2. 2019 Questionnaire to gather evidential data for the plan
- A3. 2019 Questionnaire data
- A4. 2020 Consultation leaflet (to show gathered data and receive further input)
- A5. Feedback forms and information from first consultation 2020
- A6. 2024 leaflet for regulation 14 consultation
- A7. 2024 Consultation event information
- A8. Feedback forms and information from consultation 2024
- A9. Public Bodies consulted.
- A10. Consultation feedback from residents
- A11. Response information to Residents after feedback
- A12. Consultation feedback from ESC
- A13. Consultation feedback from SCC
- A14. Consultation feedback from Other public bodies
- A15. HRA and SEA

## A1 - Neighbourhood Plan Introductory Leaflet 2019.




### Otley Neighbourhood Plan

*Shaping the Future of Otley*

Every Resident can be part of the process – so make sure that you have your say.








**What is a Neighbourhood Plan?**  
 A Neighbourhood Plan is a way of helping local communities to influence the planning of the area in which they live and work. It is our aim to use the Otley Neighbourhood Plan to develop a shared vision for the future of Otley Village.

It can... 	It can't... 
<ul style="list-style-type: none"> <li>Develop a shared vision for your neighbourhood.</li> <li>Choose where new homes, shops, offices and other development should be built.</li> <li>Identify and protect important local green spaces.</li> <li>Influence what new buildings should look like.</li> </ul>	<ul style="list-style-type: none"> <li>Undo planning decisions that have already been made.</li> </ul>



**Step 1: The Questionnaire**  
 In the next couple of weeks a member of the Neighbourhood Plan Team will be delivering questionnaires to every household in Otley.

**For more information or to contact a member of the Neighbourhood Plan Team, visit [otley.onesuffolk.net](http://otley.onesuffolk.net) or call\*\*\*\*\***

Otley Neighbourhood Plan			
Step	Method	Date	Focus
 1	<b>Leaflet Drop</b> Leaflets delivered to all households in Otley Parish.	<b>Week beginning:</b> 26 August 2019	Inform Otley parish residents about the Neighbourhood plan and to alert them to the questionnaire.
 2	<b>Questionnaire</b> Questionnaires delivered to all household in Otley Parish.	<b>Week beginning:</b> 9 September 2019	Gather information from Otley Parish Residents to inform the plan.
 3	<b>Questionnaire</b> Questionnaires to be returned via name collection points.	<b>Week beginning:</b> 12 October 2019	
 4	<b>Public meeting</b> Village Hall	To be confirmed	Present the results of the questionnaire and discuss next steps.
 5	<b>Exhibition</b> Saturday morning in the Village Hall	To be confirmed	Display the draft plan. Otley Parish residents invited to make comments.
 6	<b>Public Meeting</b> Presentation of the draft plan at a public meeting.	To be confirmed	Present the draft Neighbourhood Plan to the residents of Otley Parish.
 7	<b>Voting Station</b> Otley Village Hall - Saturday morning	To be confirmed	Vote on the draft Neighbourhood Plan

**Dates and updates will be published on the Otley Parish website and displayed around the village.**





# Otley Neighbourhood Plan

## *Shaping the Future of Otley*

### WHAT IS A NEIGHBOURHOOD PLAN?

A neighbourhood plan is a legal document which must be taken into account by developers and by the planning committee and planning officers at East Suffolk Council when considering all future planning applications.

### WHY DO WE NEED A NEIGHBOURHOOD PLAN?

If we, as a village, want to have any say in or control over what development happens in Otley in the future then we need a Neighbourhood Plan. Without it, the size and nature of development will be decided by developers and planners using policies and guidelines over which we have no control.

### THIS IS YOUR CHANCE TO HAVE YOUR SAY

This questionnaire is going to every household in the village. It is entirely anonymous. The reference number you see is simply there to avoid duplicate entries and cannot be linked to an individual or to the answers that he or she gives.

The results of the questionnaire will form the Neighbourhood Plan, which will say how you, the residents of Otley, want the village to evolve in the future.

In order to make the plan a binding document, the village will have the chance to approve it in a vote organised by East Suffolk Council - just like an election.

If this happens, all future planning applications will be made in light of the Plan's conditions for development.

REFERENCE NUMBER: .....

**So it's important that you complete the questionnaire!**



## COMPLETING THE QUESTIONNAIRE

It is important that as many questionnaires as possible are answered. We need a wide range of views.

All the members of your household aged 16 and over are invited to answer. You will see that there are 6 boxes for up to 6 people in a house to complete. It is important that each person completes the correct box for each question. For example, in the Smith household, Mr Smith may put his answer in box 1 for the first question— he should then put his answer to every question in box 1. Mrs Smith would then use box 2 and so on.

If you are unable to complete the questionnaire online, please complete the paper questionnaire and take it to the Otley Village Store where there is a collection box.

If you would like help to complete your questionnaire, or would like to have it collected, please contact a Neighbourhood Plan Group member whose contact details are listed below.

**Contact a member of the Neighbourhood Plan Group if you have any queries or**

- to have your form collected
- to ask for another form if there are more than 6 people in your house

Email: [otleyneighbourhoodplan@gmail.com](mailto:otleyneighbourhoodplan@gmail.com)  
Or Call: 07391 074 080

**1. What age group do you belong to?**

	1	2	3	4	5	6
16-17						
18-19						
20-29						
30-39						
40-49						
50-59						
60+						

**2. How long have you lived in Otley?**

	1	2	3	4	5	6
0-5 years						
6-10 years						
11-15 years						
16-20 years						
21-25 years						
26+ years						
All my life						

**3. In your opinion what makes Otley a special place?**

Please tick all that apply

	1	2	3	4	5	6
Access to the countryside						
Amenities						
Community						
Distinctive views and scenery						
Location						
Nature & Wildlife						
Social clubs and groups						
Types of housing						
Village atmosphere						
Volunteering						
Other						

Please comment

**4. What are some of the challenges to living in Otley?**

Please tick all that apply

	1	2	3	4	5	6
Lack of employment opportunities						
Lack of or poor public transport						
Poor broadband speed						
Social isolation						

**5. What type of accommodation do you live in?****Please tick all that apply**

	One answer per household
Affordable housing	
Bungalow	
Flat/Maisonette/Apartment	
Housing Association/Social Housing	
Privately owned	
Privately rented	
Shared ownership	
Sheltered housing	
Starter home (1-2 bed)	
Small home (2-3 bed)	
Medium home (3 bed)	
Large home (4 or more bed)	
Terraced housing	
Semi-detached housing	
Detached housing	

**6. Do you drive a vehicle?**

	1	2	3	4	5	6
Yes						
No						
How many vehicles in total do you have at your address?						

**7. If you are responsible for a vehicle, where do you usually park it?****Please tick all that apply**

	1	2	3	4	5	6
In a garage						
Off the road beside my home or garage						
Off the road on public land						
On the road						
Other						

**8. Do you think there is a problem with traffic in Otley?**

	1	2	3	4	5	6
There isn't a traffic problem						
HGVs speeding						
Vehicle speed						
Pedestrian/vehicle conflict						
On-road parking						
Parking on pavements						
Narrow pavement						
Lack of pavement						
Congestion						
Please state where						
Road danger/pedestrian crossing danger spots						
Please state where						

**9. Are you planning to move home in the next five years?**

	1	2	3	4	5	6
Yes						
No						
Depends on the outcome of the <u>Hubbards</u> development						
Depends on the outcome of the Swiss Farm development						

**10. If you stated that you are thinking about moving to a new home in the previous question, why do you wish to move?**

	1	2	3	4	5	6
Affordability						
Facilities more suited to your needs (age, health, mobility etc)						
Buy own home						
Downsize						
Education						
Want a more rural location						
Want a more urban location						
Upsize						

**11. If the right house was available do you intend to remain in Otley?**

	1	2	3	4	5	6
Yes						
No						

**12. In the draft Local Plan, Otley is proposed to have 60 new houses built on the Swiss Cottage Farm site.**

**Do you agree that this is an appropriate site for further development sites?**

	1	2	3	4	5	6
Yes						
No						

**13. Do you think Otley needs any more new housing in addition to the proposed 60 at the Swiss Cottage Farm site proposed in the draft Local Plan?**

	1	2	3	4	5	6
Yes						
No						

**14. In the recent consultation (2018), the village indicated that future housing should be built to create a heart within the village close to the Swiss Cottage Farm & Village Hall area.**

**Do you still agree?**

	1	2	3	4	5	6
Yes						
No						



**15. What type of new housing does Otley need?**

**Please tick all that apply**

	1	2	3	4	5	6
Affordable housing						
Bungalow						
Flat/Maisonette/Apartment						
Housing Association/Social Housing						
Privately owned						
Privately rented						
Shared ownership						
Sheltered housing						
Starter home (1-2 bed)						
Small home (2-3 bed)						
Medium home (3 bed)						
Large home (4 or more bed)						
Terraced housing						
Semi-detached housing						
Detached housing						

**16. Do you think there is a need for more business accommodation for small and start up companies in Otley?**

Please tick all that apply

	1	2	3	4	5	6
Business Centre for small and start-up companies						
Café(s), restaurant(s), farm shop(s)						
Garages						
Small manufacturing						
Large manufacturing						
Workshops						

**17. What design features are important for new housing in Otley?**

Please tick all that apply

	1	2	3	4	5	6
Charging points for electric cars						
Energy efficient housing						
Front gardens hedging/fencing between properties						
Garaging for cars						
Good pedestrian and cycling access						
Good separation between houses/ low density						
Green open spaces						
Links to the rest of the village						
Mixture of house designs in a street						
Natural boundaries						
Driveway parking for a minimum 2 vehicles						
Paved Footpaths						
Street Lighting						

**18. What type of boundaries between new houses would be in keeping with the village?**

Please tick all that apply

	1	2	3	4	5	6
Brick walls						
Natural hedgerows						
Screened by trees						
Significant planting strips between new and existing houses						
Wildlife / Eco space						
Wooden fences						
Woven willows						


**19. Do you think it is important to protect particular views, landscapes/ scenery in Otley?**

	1	2	3	4	5	6
Yes						
No						

**20. If yes, which of the features in Otley do think should be protected?****Please tick all that apply**

	1	2	3	4	5	6
Agricultural sites						
Established trees on roadside						
Hedgerows						
Ponds						
Public rights of way (footpaths, bridleways, byways, green lanes)						
Roadside verges						
Views						
Woodland						
Other						
Please comment						

**21. Which of the following actions would you support to conserve wildlife and habitats in the village?****Please tick all that apply**

	1	2	3	4	5	6
Bat boxes						
Bee Hotels						
Bird boxes (including Owl boxes)						
Community orchard						
Ponds and ditches						
Sowing wildflower/ pollinator patches						
Other						
Please comment						

**22. How do you find out what is going on in the village?****Please tick all that apply**

	1	2	3	4	5	6
Blackboard outside the Village Shop						
Grundisburgh News						
Notice board in Village Shop						
Otley Email – <a href="mailto:otleynewsletter@gmail.com">otleynewsletter@gmail.com</a>						
Otley Facebook Group – The Otley Village Store						
Otley Facebook Group – The White Hart, Otley						
Otley Website ( <a href="http://otley.onesuffolk.net">otley.onesuffolk.net</a> )						
Parish Council Notice boards						
Sign Post (Formerly Church Times)						
Word of mouth						
Other						



Please give details

**23. Otley has many facilities. From the list below please indicate which you use and how frequently.**

**Please tick all that apply**

		1	2	3	4	5	6
Bus services	Often						
	Occasionally						
	Never						
Children's play facilities (Next to the Village Hall)	Often						
	Occasionally						
	Never						
GP Surgery	Often						
	Occasionally						
	Never						
Mobile Library	Often						
	Occasionally						
	Never						
Playing Field/Play Area (next to Village Hall)	Often						
	Occasionally						
	Never						
Public Footpaths	Often						
	Occasionally						
	Never						
The White Hart Pub	Often						
	Occasionally						
	Never						
Village Hall	Often						
	Occasionally						
	Never						
Village Shop & Post Office	Often						
	Occasionally						
	Never						

**Please note;**

Frequently = Within one month

Occasionally = Within 3 months

**24. Which of the following Otley clubs and social groups have you attended?****Please tick all that apply**

	1	2	3	4	5	6
Any of the exercise classes held at the Village Hall						
Bell Ringing (St. Mary's Church)						
Book Club (White Hart)						
Bowls Club						
Bridge Club (White Hart)						
Community Council						
Community Lunch (White Hart)						
Friendship Club (Village Hall)						
Gardening Club (Village Hall)						
Gym Club (Village Hall)						
Hand-Bell Ringers						
History Society						
Junior TOPs (Village Hall)						
Knit & Natter Club (White Hart)						
Otley Primary School Parent Teacher Association						
Parish Council						
Poker Club (White Hart)						
Scouts/Cubs/Beavers						
St. Mary's Otley Parochial Church Council						
The Otley Players - TOPS (Village Hall)						
Ukulele Club (White Hart)						
Other						
Please give details						

**25. Where would you like to see money spent to improve Otley?**

**Please tick all that apply**

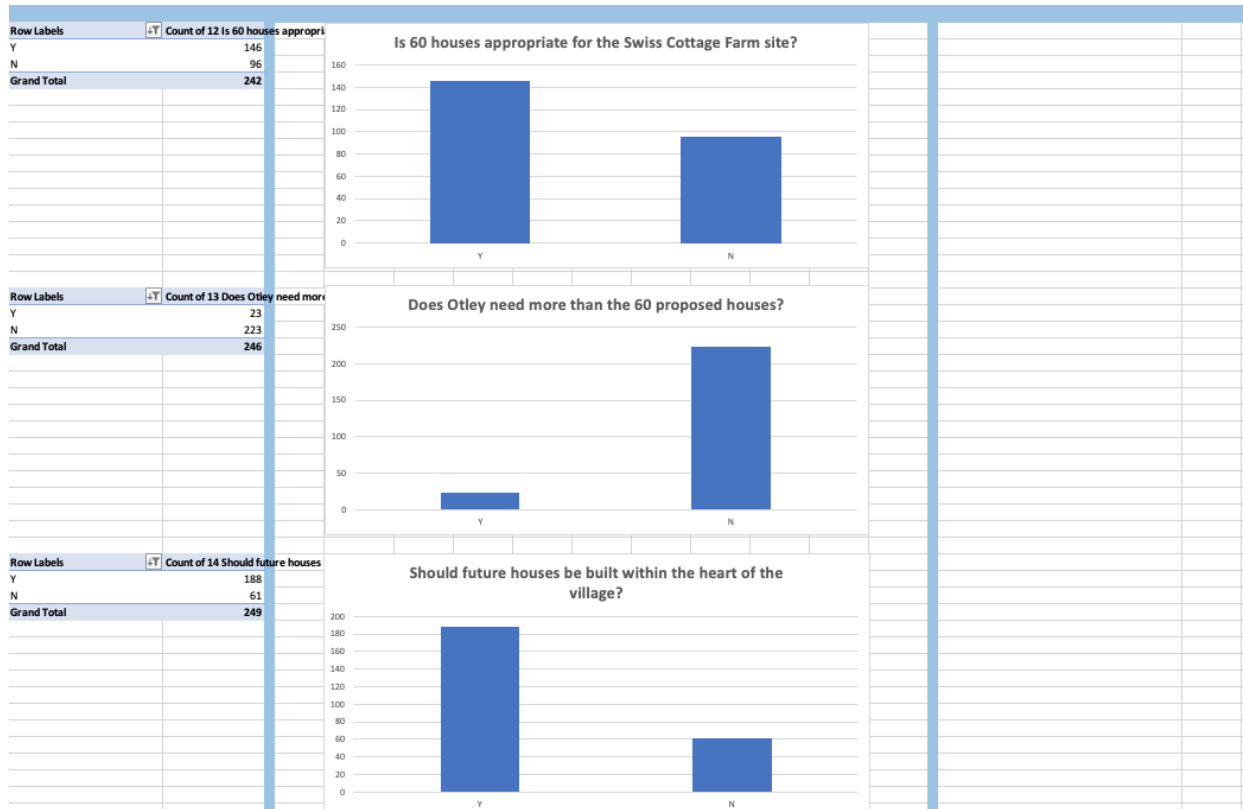
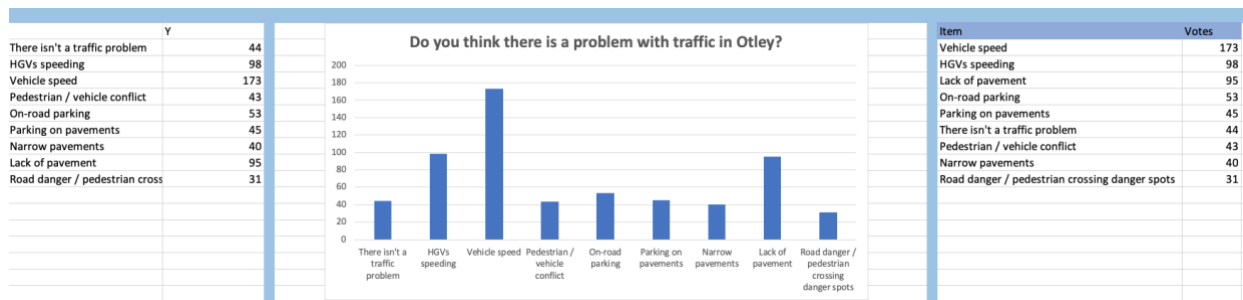
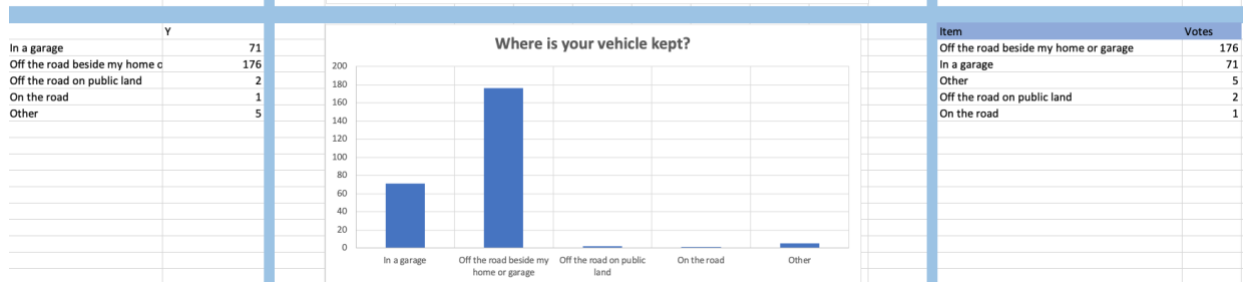
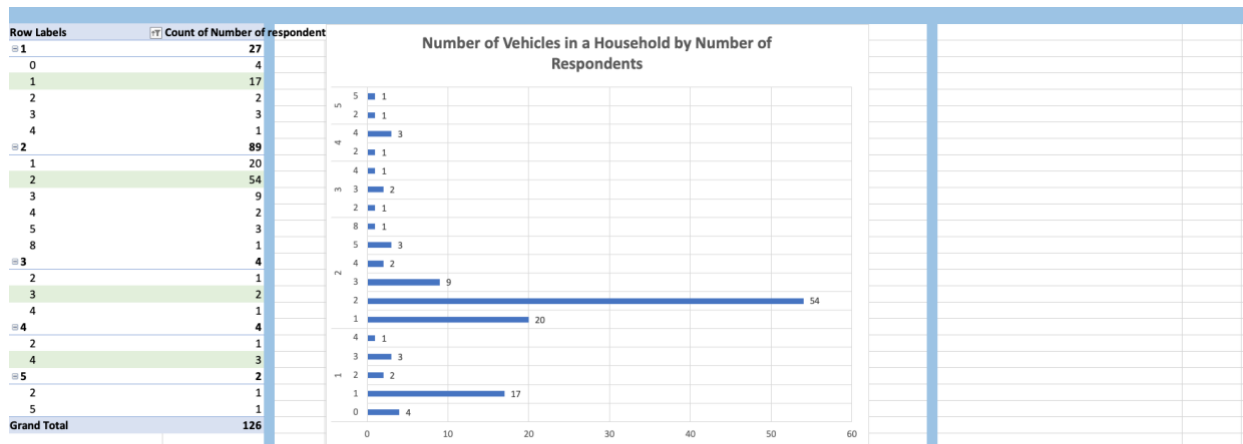
	1	2	3	4	5	6
Allotments						
All weather multi-use pitch (Astroturf)						
BMX / skateboard facilities						
Bus services; Routes/Hours						
Cafe						
Children's play facilities						
Communication of Village issues, events, notifications						
Community Orchard / Community Woodland						
Conservation area(s)						
Employment Opportunities						
Increased spend on community activities (Village Fete, Fireworks Displays etc)						
Indoor sports facilities						
Increase in green space						
Protected natural environments						
Allotments						
Orchard(s)						
Maintenance; bins, litter, drainage, signage						
Otley Primary School capacity and facilities						
Outdoor gym						
Parking in and around the village and its facilities						
Paving & Footpaths						
Quality of Roads						
Scout Hut capacity and facilities						
Speed limit enforcements						
Sports facilities; table tennis, adult gym, basketball court						
Tennis court(s)						
Village Hall – Refurbish the current building						
Village Hall – Create a new building						
Other						
Please comment						

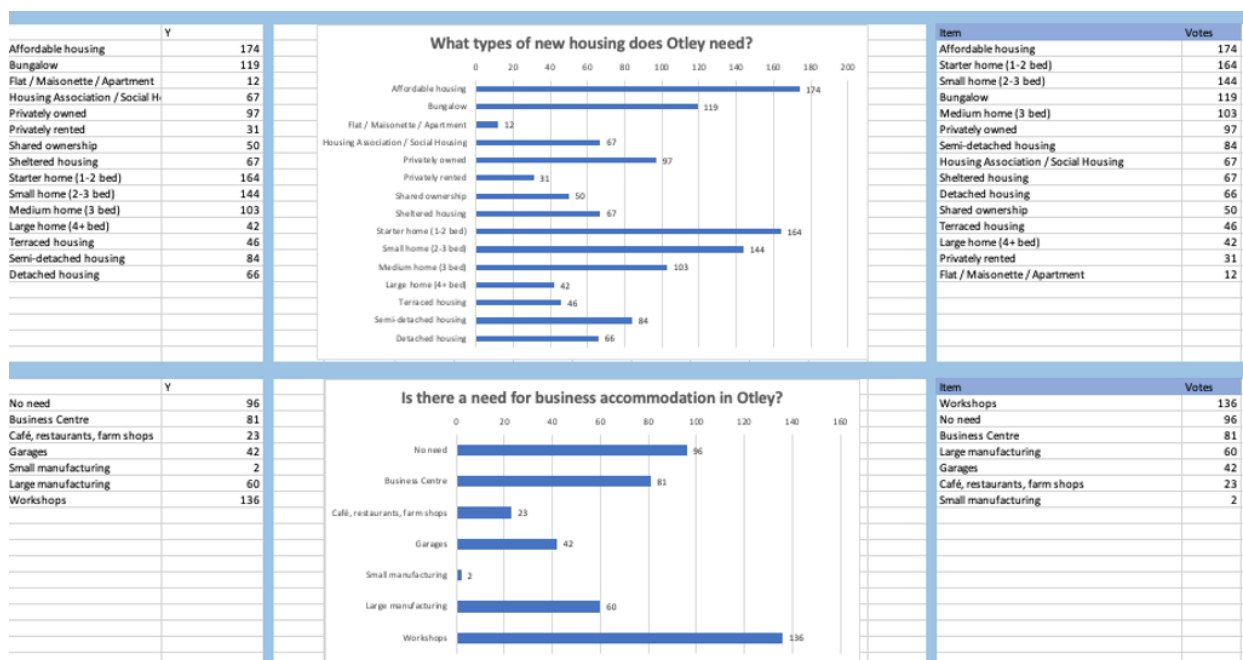
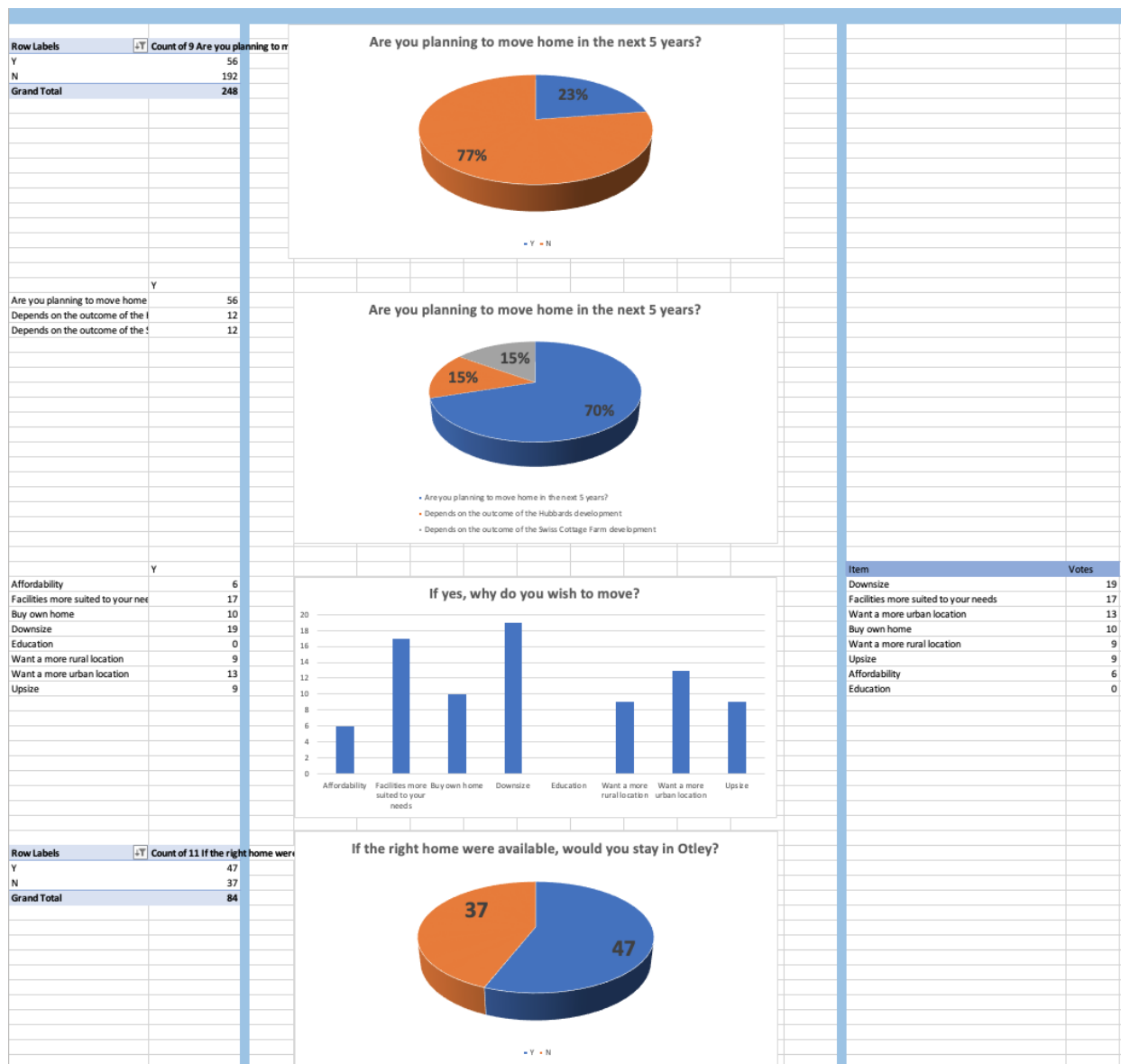
**26. Development brings about impacts on services and infrastructure.****Which of the following concern you the most**

	1	2	3	4	5	6
Broadband connection						
Congestion / Increased traffic						
Environmental Impact						
Inconsiderate parking						
Insufficient places to park						
Impact on GP Surgery capacity, service and facilities						
Impact on leisure facilities						
Impact on Otley Primary School capacity and facilities						
Lack of street lighting						
Light pollution						
Losing the feel and character of the village						
Noise pollution						
Paving & Footpaths						
Pedestrian safety						
Quality of Roads						
Speed limit enforcement						
Other						
Please comment						

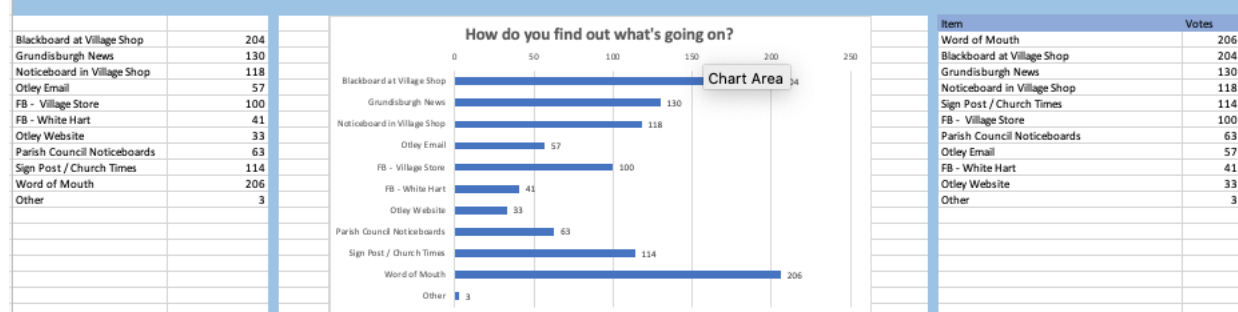
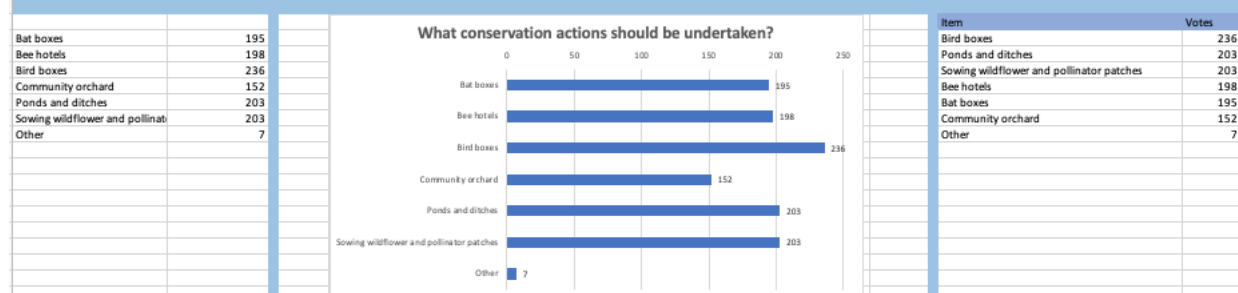
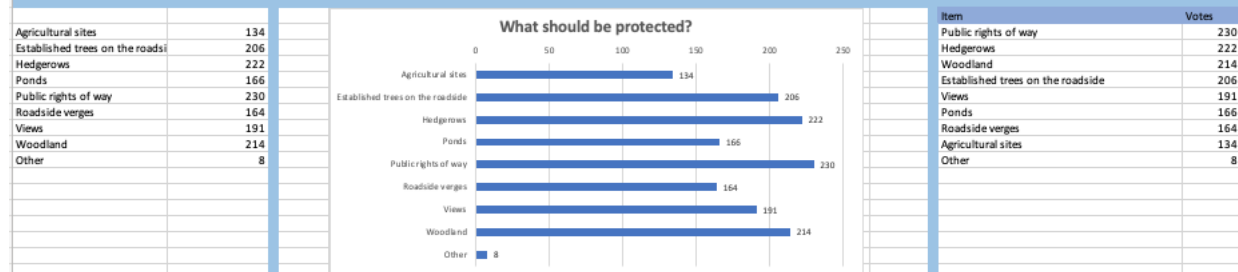
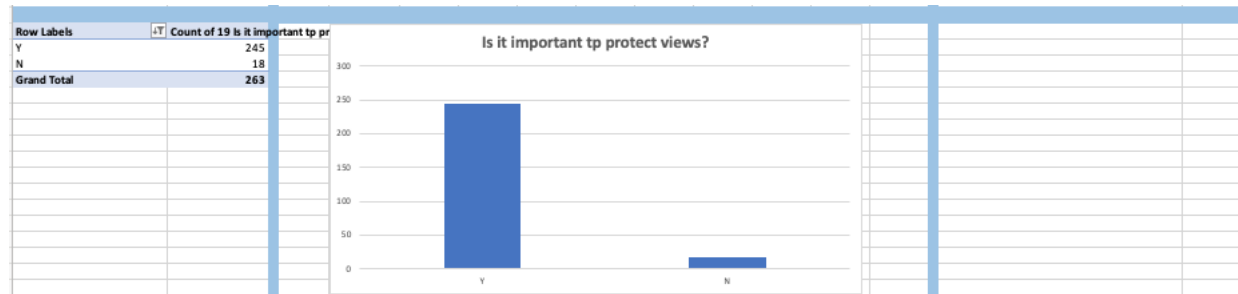
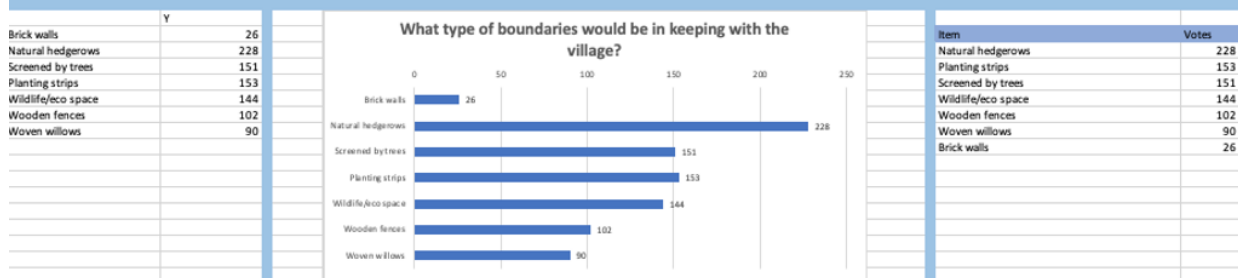
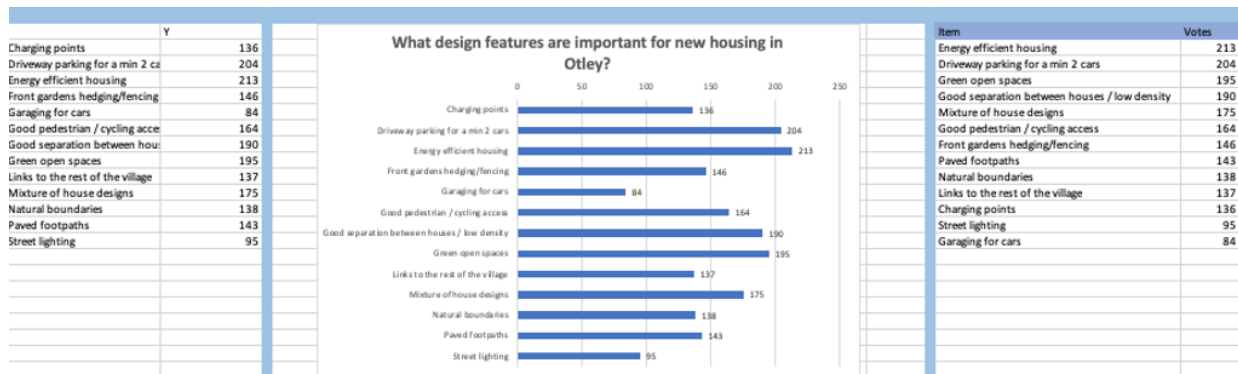
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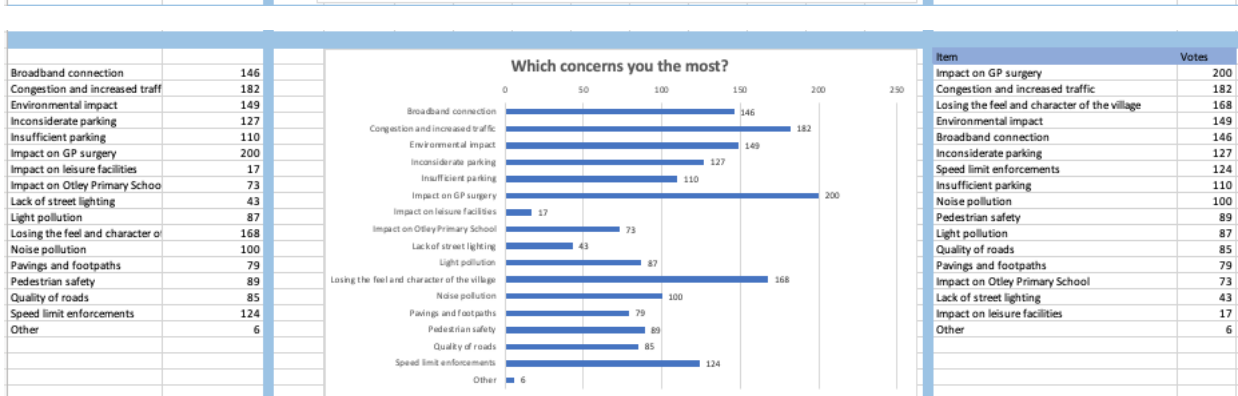
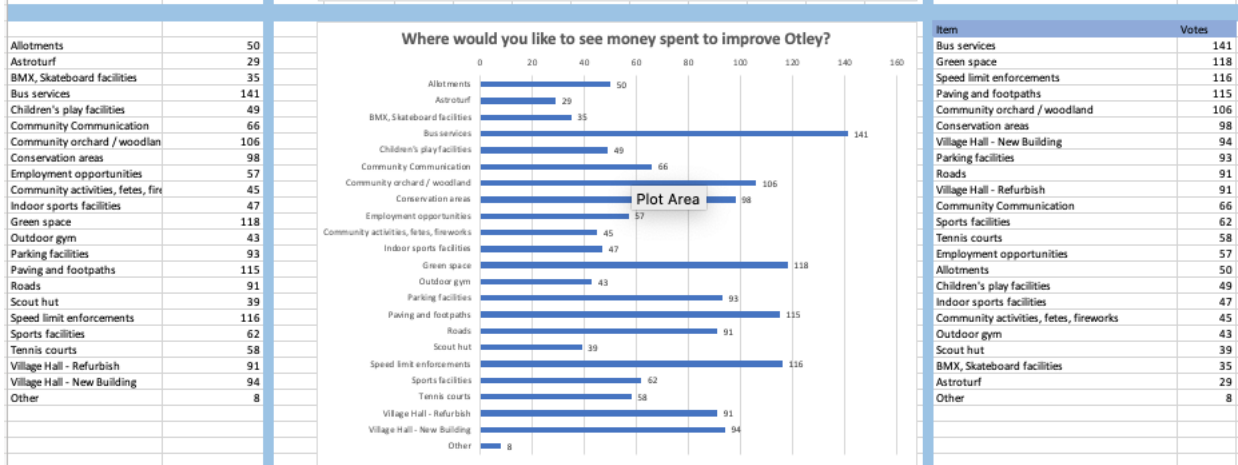
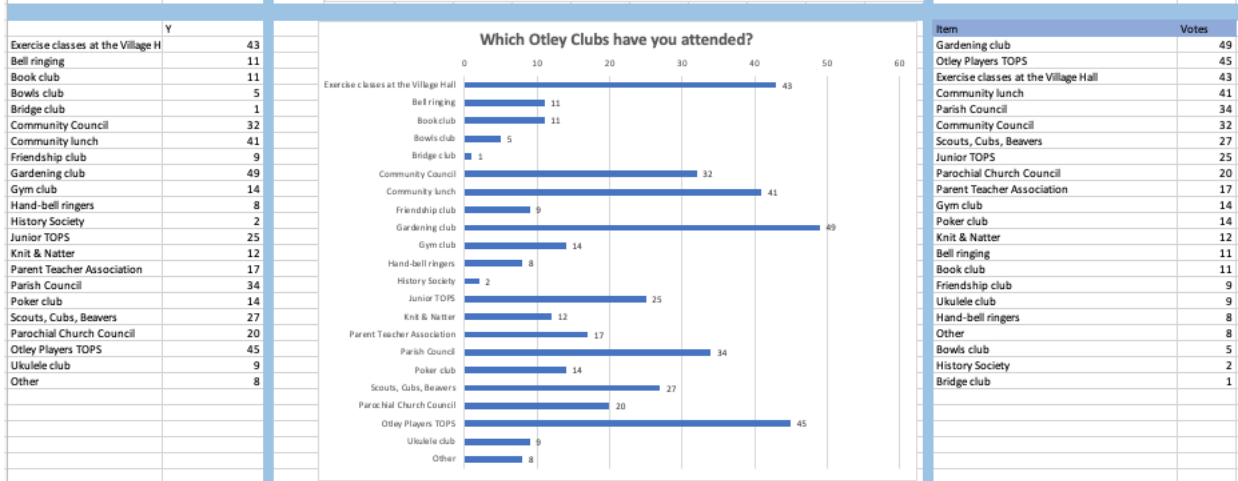
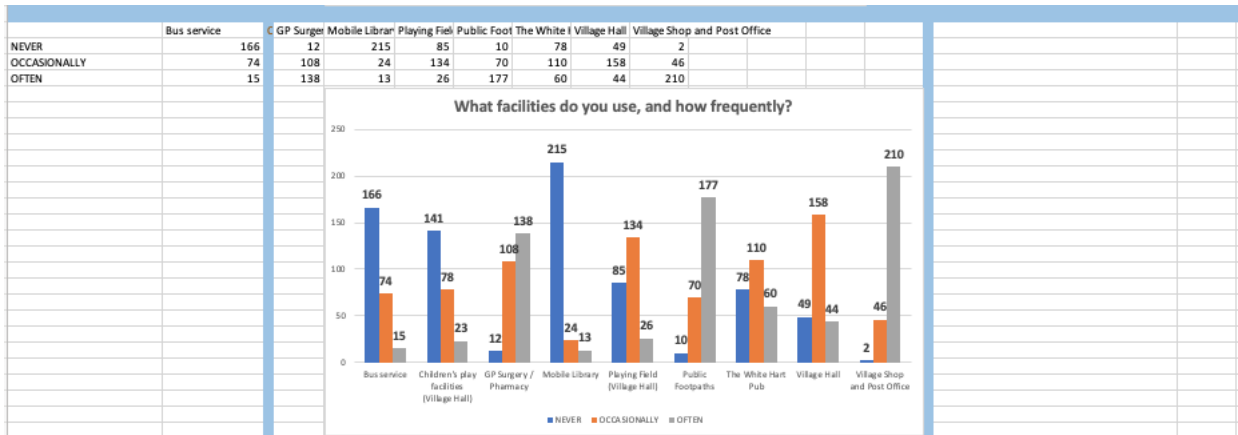
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Otley Neighbourhood Plan  
*Shaping the Future of Otley*

# Consultation Event

## Saturday 7 March 2020

### 11am to 2.30pm

### Otley Village Hall

**An informal drop in / open event to:**

- **View results from the Neighbourhood Plan questionnaire**
- **Discuss results directly with members of the Neighbourhood Plan team (Part of the Otley Parish Council)**
- **Provide further opportunity for community input to continue to develop the Neighbourhood Plan**
- **Find out what opportunities there are in the village - clubs, groups and events**

*Every resident can be part of the process – so make sure that you have your say.*

**For more information or to contact a member of the Neighbourhood Plan Team;**  
visit: [otley.onesuffolk.net](http://otley.onesuffolk.net)  
email: [otleyneighbourhoodplan@gmail.com](mailto:otleyneighbourhoodplan@gmail.com)  
phone: 07391 074 080

## A5 - Feedback from consultation 2020

### Otley Neighbourhood Plan Consultation and Feedback event 7<sup>th</sup> March 2020

Comments and suggestions made regarding pavements and footpaths at various locations identified by coloured stickers on a map of Otley, co-ordinated with matching stickers and a tally kept (original retained)

1. **2 Comments**;- regarding lack of footpath from Otley College to the Village and that the footpath at “Wild Wood” Otley Bottom to the village is overgrown.,nd partially blocked by a slurry heap. The path from Otley Green to Poplar farm has not been re-instated.

\*Path from college would be across private land, probably not feasible.

\*Paths at “Wild Wood” Otley Green have been referred to Parish Council.

2. **9 Comments** ;-requesting footpath to the Pub  
Unanimous Just a track not paved or urbanised in any way, just a need to get off the road, due to speeding traffic. Vociferous regarding speeding on Helmingham Road, 20mph demanded!! Preferred to Chicanes etc. Generally against pedestrian crossing as too urbanising
3. **8 Comments**;- about pavement parking outside the shop, mostly down to lazy people not parking a bit further down Chapel road. Advised of St. Mary’s Grange Parking places, tho not exclusively for the shop.  
All emphatic that any measures taken must not be to the detriment of the shop
4. **5 comments**;- Narrow pavement on Chapel Road, the stretch between Hall Lane and Newlands, not wide enough for mother child, and buggy – Also speeding from Otley Green into the village (40-50mph claimed) 20mph limit advocated
5. **3 comments**;- Speed on Church Road, Otley Hill, especially on bend by Church View, Chicanes 20mph limit, and signs indicating “No Footpath” suggested
6. **3 comments**;- Ipswich Road-Gibraltar Road designated “Quiet Lane” for dog walkers, cyclists , horse riders and walkers. NONE WERE RESIDENTS OF THESE ROADS!!
7. **3 comments**;- Parking should be restricted on road opposite Village Hall Entrance, difficult exiting on bend with restricted road width
8. **1 Comment** ;-off road parking on verges on Helmingham Road, restricts visibility for residents exiting.
9. **9 suggestions**;- that the map of footpaths around the parish could be produced as a leaflet/pdf for walkers etc.

All comments have been noted worthy or not (who are we to judge! )Some responses will overlap with Andrews’s traffic study but this just shows the depth of feeling regarding speeding traffic, the consensus is a 20MPH speed limit would be greatly beneficial

1) Speeding

A very strong response on this mainly along the lines that something needs to be done about it as a matter of urgency before any more incidents /accidents happen . The main points were:

- a) Strong support for the existing 30 mph limit to be lowered to 20mph (34 responses in favour )
- b) If it is not possible to change existing limits from 30 to 20 mph then introduce 20 mph limits in an area bounded by Hall Lane /Chapel Road , White Hart Helmingham Road ,Church Road Church Farmhouse. (14 comments).
- c) 40mph limit from Otley Bottom to the Alpaca Farm needed. Complaints about speeding and dangerous overtaking . Apparently there have been a number of near misses and minor accidents . ( 8 comments).
- d) 40 mph limit to be extended from Otley college beyond the Swilland crossroads to join up with the 40 MPH limit towards the Ashbocking cross roads due to speeding and dangerous overtaking near the crossroads ( 6 comments)
- e) Speeding in Hall Lane ( 4 comments)
- f) Complaints about tractors speeding (7 comments)
- g) Village gates , support from 11 comments
- h) Speed limit numbers to be painted on roads (8 comments)
- i) Speeding a problem past Otley College on the Grundisburgh road.( 3 comments)

2) HGV speeding

28 comments about this ,mostly relating to speeding in Helmingham road from the parish boundary to Chapel Road junction . Also 4 comments about speeding in Chapel Road from Hall Lane to the Parish boundary with particular emphasis on apparent speeding of HGVs between 0300 and 0400 on a regular basis. There were 2 comments on HGV speeding in Hall Lane .

3) Speeding enforcement

This was strongly felt to be lacking and needs to be actioned by the police on a more regular basis . ( 26 comments) . Tempodis not being used regularly enough unlike Grundisburgh and other villages round this area ( 6 comments).

4) Other

a) Otley Bottom Junction

Concerns expressed strongly about traffic congestion and problems with HGVs trying to pass on the hill. Some form of traffic control was suggested with traffic lights being suggested ( 9 comments).

As a general point there were serious concerns expressed at the existing volume of traffic at the junction and the effect of both the Swiss Farm development and Hubbards development on traffic at this junction in the future. A number of attendees suggested that a proper traffic survey be done now before any further development in the village takes place.

b) Parking

- 1) Complaints about parking causing a serious obstruction outside the Church when field used for parking not used( 6 comments). Suggestions made that warning signs and cones be used and no parking on the bend.

- 2) Complaints about parking on Helmingham Road outside the shop causing an obstruction and interfering in sight lines at the Chapel Road junction (5 comments ) Yellow lines suggested.
- 3) Yellow lines outside the school.

c) Cycling

Suggestions made about having cycling priority lanes in Helmingham Road and Chapel Road (6 comments)

d) Pedestrian Crossing in Helmingham Road

Some strong views expressed on the need for this, as crossing the road increasingly hazardous due to speeding and new parking spaces for the shop being located across a busy road.( 9 comments in favour ).

e) Car free

There was one suggestion that consideration be given to having car free days or car free zones in the village or in new developments.

f) Damage to road shoulders and road surfaces caused by HGVs .

There were 6 comments on this mainly relating to road shoulders in Helmingham Road from White Hart to the parish boundary. Suggested that reports be made to Highways in order get some action.

# A6 - Otley Neighbourhood Plan Regulation 14 Consultation Leaflet 2024.



## Otley Neighbourhood Plan *Shaping the Future of Otley*

Otley Parish Council would now like to hear your views on the draft neighbourhood plan for the Parish. The timetable overleaf shows the steps involved in making a neighbourhood plan. To date residents have been asked their views via a questionnaire with a public meeting presenting the results in 2020. Since then the Neighbourhood Planning Group (NPG) has produced a draft neighbourhood plan bringing us to step 4, the 'Pre Submission Consultation' where we ask for your views on the draft consultation plan and consider them before submitting the plan to East Suffolk Council for approval.

### To read the plan and submit your comments you can:

- Read the consultation draft plan online and complete the feedback form at <http://otley.onesuffolk.net/neighbourhood-plan> available from 8/1/24 - 26/2/24
- Attend the exhibition at Otley Village Hall on Saturday 13 January 2024 - between 10am-3pm and complete the feedback form
- Borrow a hard copy of the draft plan by contacting us at [otleynp@gmail.com](mailto:otleynp@gmail.com) or ringing 01473 890232
- Feedback forms can be completed electronically and emailed to [otleynp@gmail.com](mailto:otleynp@gmail.com) or in hard copy and handed in at the collection point in the Otley Village Store
- For any queries please email [otleynp@gmail.com](mailto:otleynp@gmail.com) or ring a member of the NPG on 01473 890 232

### Neighbourhood plans can:

- Develop a shared vision for your neighbourhood
- Choose where new homes, shops, offices and other development should be built
- Identify and protect important local green spaces
- Influence what new buildings should look like.

### They can't

- Undo planning decisions that have already been made.

Further information on Neighbourhood planning can be found at: [www.gov.uk/guidance/neighbourhood-planning-2](http://www.gov.uk/guidance/neighbourhood-planning-2)

## Otley Neighbourhood Plan

Step		Date	Focus
1	Leaflets delivered to all households in Otley Parish.	August 2019	Inform Otley Parish residents about the Neighbourhood Plan and to alert them to the questionnaire.
2	Questionnaire delivered to all household in Otley Parish and returned to NPG group.	September/October 2019	Gather information from Otley Parish residents to inform the plan.
3	Public Meeting Otley Village Hall	March 2020	Present the results of the questionnaire and discuss next steps.
4	Pre Submission Consultation (Public consultation)	Consultation period 8/1/24 - 26/2/24 Exhibition in Village Hall on 13/1/2024 from 10am-3pm	Otley Parish residents invited to make comments on the Otley Neighbourhood Plan Consultation Draft prior to submission to East Suffolk Council.
5	Submission of the Otley Neighbourhood Plan to East Suffolk Council (ESC)	Spring 2024	If ESC finds the plan meets the legal requirements it publicises the plan, notifies consultation bodies and appoints an independent examiner.
6	Independent Examination of the Otley Neighbourhood Plan	TBC	Issues a report to ESC who take their view and determine whether to send the plan to referendum.
7	Referendum	TBC	Residents invited to vote on the Otley Neighbourhood Plan
8	If more than half of those voting in the referendum vote in favour of the neighbourhood plan, the plan comes into force as part of the statutory development plan for the area.		



A7 - Otley Neighbourhood Plan 2024 Consultation event information.

[Link to video of event on Parish Council Website.](#)



**Otley Neighbourhood Plan Consultation Draft Feedback Form**

**Public Consultation 8/1/2024-26/2/2024**

Please provide us with your contact details:

Name	
Email	
Telephone number	
Address (optional)	

You must be a resident of Otley Parish to take part in this consultation.

The information you have supplied is being collected for the Otley Neighbourhood Plan. By completing this form, you consent to Otley Neighbourhood Planning Group using your information in this way.

As part of the neighbourhood planning process, you have the option for East Suffolk Council to contact you in connection with later stages of the plan's development. Please read the statement below and tick the box if you consent to your details being shared.

Your information will be retained by the Neighbourhood Planning Group and East Suffolk Council for the purpose of the plan's development and referendum. You can request that

# A8 - Feedback forms and information from consultation 2024

## **Otley Neighbourhood Plan Consultation Draft Feedback Form**

**Public Consultation 8/1/2024-26/2/2024**

Please provide us with your contact details:

Name	
Email	
Telephone number	
Address (optional)	

You must be a resident of Otley Parish to take part in this consultation.

The information you have supplied is being collected for the Otley Neighbourhood Plan. By completing this form, you consent to Otley Neighbourhood Planning Group using your information in this way.

As part of the neighbourhood planning process, you have the option for East Suffolk Council to contact you in connection with later stages of the plan's development. Please read the statement below and tick the box if you consent to your details being shared.

Your information will be retained by the Neighbourhood Planning Group and East Suffolk Council until the Neighbourhood Plan is made following examination and referendum. You can request that your information is deleted at any time, however you will not be informed directly of any progress the Plan may make.

Data will be processed and held securely by East Suffolk Council and in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018 (and any updates) and the [Planning Policy and Delivery Privacy Notice](#).

Please read the following statement and check the box:

☐ I consent to my information being shared with East Suffolk Council so they can contact me in the future in connection with the later phases of the Neighbourhood Plan/Planning document.

Please email your completed form to [otlevnp@gmail.com](mailto:otlevnp@gmail.com) or alternatively complete a hard copy form and hand it in at the Otley Village Store collection point by 26/2/2024.

Please provide us with your comments below:

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## A9 - Otley Neighbourhood Plan Consultee list for Regulation 14 consultation

Other consultees (always contact)

Organisation	Email	Type
Adjoining Parish Councils	See <a href="#">Election Maps (ordnancesurvey.co.uk)</a> ESC can supply contact details if requested.	Consultation Bodies

Organisation	Email	Type
East Suffolk Council	<a href="mailto:planningpolicy@eastsuffolk.gov.uk">planningpolicy@eastsuffolk.gov.uk</a>	Consultation Bodies
Natural England	<a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>	Consultation Bodies
Environment Agency	<a href="mailto:planning.eastanglia@environment-agency.gov.uk">planning.eastanglia@environment-agency.gov.uk</a>	Consultation Bodies
Historic England	<a href="mailto:eastplanningpolicy@HistoricEngland.org.uk">eastplanningpolicy@HistoricEngland.org.uk</a>	Consultation Bodies
Suffolk County Council	<a href="mailto:neighbourhoodplanning@suffolk.gov.uk">neighbourhoodplanning@suffolk.gov.uk</a>	Consultation Bodies
Suffolk Preservation Society	<a href="mailto:bethany@suffolksociety.org">bethany@suffolksociety.org</a>	Other Consultee
Anglian Water	<a href="mailto:spatialplanning@anglianwater.co.uk">spatialplanning@anglianwater.co.uk</a>	Consultation Bodies
Essex and Suffolk Water	<a href="mailto:planningconsultations@nwl.co.uk">planningconsultations@nwl.co.uk</a>	Consultation Bodies
Mobile UK	<a href="mailto:planning@mobileuk.org">planning@mobileuk.org</a>	Consultation Bodies
Suffolk and North East Essex Integrated Care Board	<a href="mailto:planning.apps@suffolk.nhs.uk">planning.apps@suffolk.nhs.uk</a>	Consultation Bodies
UK Power Networks	<a href="mailto:DemandReferrals@ukpowernetworks.co.uk">DemandReferrals@ukpowernetworks.co.uk</a>	Consultation Bodies
National Grid and National Gas	<a href="mailto:nationalgrid.uk@avisonyoung.com">nationalgrid.uk@avisonyoung.com</a> <a href="mailto:box.landandacquisitions@nationalgrid.com">box.landandacquisitions@nationalgrid.com</a> <a href="mailto:nationalgas.uk@avisonyoung.com">nationalgas.uk@avisonyoung.com</a> <a href="mailto:kam.liddar@nationalgas.com">kam.liddar@nationalgas.com</a>	Consultation Bodies

Other Consultees (where applicable)

Organisation	Email	Type
Adjoining District Councils	Mid Suffolk (Babergh and Mid Suffolk District Council) planning department	Consultation Bodies
Suffolk Wildlife Trust	<a href="mailto:planning@suffolkwildlifetrust.org">planning@suffolkwildlifetrust.org</a>	Other Consultee – good practice to consult
Homes and Communities Agency	<a href="mailto:enquiries@homesengland.gov.uk">enquiries@homesengland.gov.uk</a>	Consultation Bodies
Network Rail	<a href="mailto:TownPlanningAnglia@networkrail.co.uk">TownPlanningAnglia@networkrail.co.uk</a>	Consultation Bodies

National Highways	<a href="mailto:PlanningEE@nationalhighways.co.uk">PlanningEE@nationalhighways.co.uk</a>	Consultation Bodies
Suffolk Police Designing Out Crime Officer	<a href="mailto:Jacqueline.norton@suffolk.police.uk">Jacqueline.norton@suffolk.police.uk</a> <a href="mailto:Alan.osborne@suffolk.pnn.police.uk">Alan.osborne@suffolk.pnn.police.uk</a>	Other Consultee
Sport England	<a href="mailto:Planning.Central@sportengland.org">Planning.Central@sportengland.org</a>	Other Consultee

## A10 - Summary of Responses to Parish Consultation on Otley Neighbourhood Plan 2024

Individual comments/responses are numbered for privacy.

number	contents	NP team response
01	<p>Detailed analysis of text – conflicts with other ESDC policies etc</p> <p>Strategic points:</p> <ul style="list-style-type: none"> <li>• Conflict with BNG and policy</li> <li>• Clarification of “special circumstances”</li> <li>• ONHP7: significant points including take out “shall be refused”</li> <li>• ONHP10: evidence for housing mix</li> <li>• ONHP14: conflict of car dependency with greater car use.</li> </ul>	<p>Granular – will review item by item</p> <p>Awaiting updated comments also.</p> <ul style="list-style-type: none"> <li>• ONHP14 ESC unhelpful here as alternatives need to be provided before car dependency can decrease.</li> </ul>
02	Comments on detail of maps pictures and text	Detailed comments – to be incorporated where possible
03	NP is not addressing that can’t get 60 houses on Swiss Farm site	On ESC – confirm with Ben Norton likely impact of this.
04	<p>Detailed comments +</p> <ul style="list-style-type: none"> <li>• Suggests include Allotment provision &amp; further green spaces</li> <li>• Address what happens to buildings cut in half at Swiss Cottage farm</li> <li>• Expansion of graveyard provision</li> <li>• Include quiet lanes ( &amp; speed limits)</li> <li>• Address needs of young people</li> <li>• Designated HGV routes – B1078 &amp; B1079</li> <li>• Encourage retail /start up businesses in village</li> </ul>	<ul style="list-style-type: none"> <li>• Allotments to do with land provision around new properties, if adequate gardens shouldn’t be necessary. We have community orchard and most people have gardens in village, there has not been village request for allotments.</li> <li>• Swiss Cottage Farm on ESC</li> <li>• Graveyard / speed and young people– PC matters</li> <li>• Encourage business in ONHP12F</li> </ul>
05	<p>Suggests:</p> <ul style="list-style-type: none"> <li>• Mentioning church and chapel in 2.1.7 &amp; suggestions for support of these organisations/buildings</li> <li>• ONHP5 – New Homes to Future Homes Standards + include on site renewable electricity generation +references other technologies not necessary +remove ref to rainwater harvesting</li> <li>• Remove refs to green walls and roofs</li> <li>• Development of Otley Bottom to cope with lorries and flooding – suggests lighting</li> </ul>	<ul style="list-style-type: none"> <li>• Agree will add to 2.1.7</li> <li>• Points 2 &amp; 3 to be discussed with Ben Norton</li> <li>• Otley Bottom flooding on PC</li> </ul>
06	Speed of traffic on quiet lanes & of HGVs Poor condition local roads	Both PC

07	<p>Against Swiss Cottage Farm development site:</p> <ul style="list-style-type: none"> <li>• Views</li> <li>• Potential Expansion of surgery</li> <li>• flooding</li> </ul>	<ul style="list-style-type: none"> <li>• we are trying to protect views to side</li> <li>• Surgery consulted and this is not of interest to them.</li> <li>• Flooding -SUDS required by ESC</li> </ul>
08	<p>Concerns Swiss Cottage Farm site:</p> <ul style="list-style-type: none"> <li>• roads – restricted view and busy with school, hall and doctors</li> <li>• speeding – increasing housing = increasing traffic speed should be addressed</li> <li>• roads and pavements need updating</li> <li>• transport – bus service to Woodbridge</li> <li>• more affordable housing needed</li> <li>• Otley Community Orchard should be mentioned</li> </ul>	<ul style="list-style-type: none"> <li>• Roads &amp; Speeding = Highways &amp; ESC</li> <li>• Roads and pavements – PC/ESC</li> <li>• Bus service – evidence of demand?</li> <li>• Affordable housing needs– Ben</li> <li>• Agree – Orchard to be included in 4.4</li> </ul>
09	<p>Swiss Farm Field is waterlogged – inadvisable to build on it</p>	<ul style="list-style-type: none"> <li>• Flooding – SUDS required by ESC</li> </ul>
10	<p>History of Otley:</p> <ul style="list-style-type: none"> <li>• Stream is Finn or Fynn not Lark</li> <li>• Mount is not Norman – Roman?</li> </ul> <p>Prefer Village not to expand Anti more speed limits</p>	<ul style="list-style-type: none"> <li>• Confirm definitively with Environment Agency on stream</li> <li>• 2.2 add extra line to say “probably built on site of Roman fortification”</li> </ul>
11	<p>ONHP06 – defining settlement boundaries with a gap between in middle of village will push development to periphery – more sense for it to be in the centre of village.</p>	<ul style="list-style-type: none"> <li>• Ben Norton</li> </ul>
12	<ul style="list-style-type: none"> <li>• How are we addressing that the Swiss Cottage Farm site will not house the numbers that are allocated?</li> <li>• Like screening policy suggest to add semi mature tree planting defined with support, guards and watering</li> <li>• Style of new builds should reflect Suffolk heritage and rural location.</li> </ul>	<ul style="list-style-type: none"> <li>• (repeat) The allocated numbers form part of the local plan.</li> <li>• Yes – include in ONHP8 in g and in Design Code.</li> <li>• Design code</li> </ul>
13	<p>Include vision for Otley for 10-15years &amp; be a lobbying document for highways / environment agency / Broadband / water. Strategy to guide spending.</p> <ul style="list-style-type: none"> <li>• Pro Green gaps</li> <li>• Quiet lanes: new development down them incompatible with recreational uses</li> <li>• Traffic speeds currently too high – jeopardises safety and quiet enjoyment of country lanes.</li> <li>• Footway along Helmingham Road</li> <li>• Renewable energy should be required all new buildings</li> </ul>	<ul style="list-style-type: none"> <li>• Beyond remit? Ben Norton</li> <li>• This is an ESC matter</li> <li>• PC</li> <li>• PC</li> <li>• Building regs covers this?</li> </ul>

	<ul style="list-style-type: none"> <li>Flood and water management – SUDS – negotiate water attenuation measures for Otley Bottom</li> <li>Pro planted boundary treatment</li> <li>Footpaths – ask landowners to leave greater width to preserve</li> <li>Pro housing mix</li> <li>Cycle parking new developments.</li> <li>Replacing village hall – include other sports facilities – be ready for CIL money from Swiss Cottage Farm site.</li> </ul>	<ul style="list-style-type: none"> <li>Should we include something on water management at new developments (Ben Norton)</li> <li>Cycle parking is in planning</li> <li>PC – good point</li> </ul>
14	4.6.2.6 says 206 dwellings – out of date- now 276	<ul style="list-style-type: none"> <li>NP team to go back to ESC to confirm number</li> </ul>
15	Swiss Cottage Farm site is too small for allocated number of dwellings – storing up trouble if this is not addressed	<ul style="list-style-type: none"> <li>(Repeat)</li> </ul>
16	Should be no more houses at Otley Bottom, Ipswich Road and Helmingham Road north of Ipswich Road.	<ul style="list-style-type: none"> <li>These are outside settlement boundary – is ESC policy</li> </ul>
17	Suggests Anglian Fencing site be included as wildlife /green space as abandoned for 20 years.	<ul style="list-style-type: none"> <li>Private land not in our remit</li> </ul>
18 & 19	<p>Suggests:</p> <ul style="list-style-type: none"> <li>more info on Listed Buildings &amp; a map, and to include NDHA (non-designated Heritage Assets)</li> <li>Do Housing &amp; Development policies cover infills too ?– lists concerns with infills &amp; suggests could be a separate specific policy ?</li> <li>4.3.4 Area to be protected around the church does not include SCLP11.8 which includes properties adjacent to the church.</li> </ul>	<ul style="list-style-type: none"> <li>Yes – have asked ESC for a map and if not will make one.</li> <li>SCLPS 7 – useful to talk to Ben Norton about how policies might need to be different for infill</li> <li>This policy is historic – impact of including people’s homes in this – Ben Norton.</li> </ul>
20	Agrees with plan. Would like to see public transport facilities improved	<ul style="list-style-type: none"> <li>PC</li> </ul>
21	<p>Concern what will happen as Swiss Cottage site not large enough for 60 houses – so where do remainder go.</p> <p>Church side of St Mary’s Grange not completed – potentially to enable future building. More development impact on flooding.</p>	<ul style="list-style-type: none"> <li>(Repeat)</li> <li>Likelihood of site to be built on? (Ben)</li> </ul>
22	<ul style="list-style-type: none"> <li>Include community orchard</li> <li>Employment opportunities in the village</li> <li>Impact of additional vehicles from Swiss Farm site</li> </ul>	<ul style="list-style-type: none"> <li>Repeat</li> <li>Repeat</li> <li>Repeat</li> </ul>
23	<ul style="list-style-type: none"> <li>Otley Bottom – floods &amp; HGVs make roads not fit for purpose</li> <li>Water mains need to be replaced</li> <li>Poor mobile phone signal</li> <li>Community orchard</li> </ul>	<ul style="list-style-type: none"> <li>Highways / PC</li> <li>PC – Anglia water – CIL?</li> <li>Out of our remit</li> <li>Repeat</li> </ul>



	<ul style="list-style-type: none"> <li>• Community resources adequate for new development</li> <li>• 20mph speed limit on Helmingham Road</li> </ul>	<ul style="list-style-type: none"> <li>• We have more than most villages</li> <li>• PC</li> </ul>
24	Repeat of above comments	
25	<ul style="list-style-type: none"> <li>• Roads – Otley Bottom</li> <li>• Footpath maintenance – path from Spring Park to Hall Lane</li> </ul>	<ul style="list-style-type: none"> <li>• Repeat / PC</li> <li>• PC</li> </ul>
26	<ul style="list-style-type: none"> <li>• ONHP7 – “in proportion and scale” suggesting more description to ensure new dwellings have external space and gaps between</li> <li>• ONHP16 – include improvements expansion to shop / bowls / pub / playing field /sports &amp; play facilities</li> <li>• ONHP10f “range” of affordable housing is too vague – add minimum</li> <li>• 4.6.4.4 concern at density of proposed Swiss Farm. Is the site likely to expand to accommodate numbers</li> </ul>	<ul style="list-style-type: none"> <li>• Design Code</li> <li>• Mention and support rather than expand? (Ben)</li> <li>• Ben</li> <li>• Repeat</li> </ul>

## A11 - Response to residents comments and feedback from consultation 2024.

Dear Respondent,

Having now had a chance to reflect on the various comments and suggestions which were submitted during the Neighbourhood Plan Consultation, we thought you might be interested to see the range of responses which were submitted and how we intend to update the Plan as a result. Where comments have not been relevant to the plan we have passed these on to the Parish Council or other appropriate body.

The issue raised the most was the allocated **Swiss Cottage Farm site**. Concerns were raised about future development on this site and potential issues of:

1.How it will look - views, screening, that the buildings should reflect Suffolk Heritage and its rural location.

2.The impacts it will have - access and speed of transport, updating of roads and pavements, upgrading of infrastructure such as water mains.

3. What it will entail- need for more affordable housing in the village and can we leave capacity for Doctors to expand. Parking Standards and public transport.

4.Is it a viable site- It was pointed out by many that the site is too small for the allocated 60 houses, and that the site is often waterlogged. Some of the existing buildings are halved by the site boundary.

1. How it will look: The Swiss Cottage Farm site was allocated by SCDC in 2019, East Suffolk Council (ESC) has incorporated the development of the site in their Local Plan and as policy SCLP12.58. The site has been allocated by ESC and it therefore is a given that it will in time be developed, and the Neighbourhood Plan by means of policy ONHP11 tries to mitigate the impacts. The views towards the site will be softened by the planting boundaries described in ONHP8 and as shown in Appendix E. New maps are being drawn which more clearly identify the planting boundaries which will be required. The Neighbourhood Plan Team are moving their attention to writing a simple Design Code or Guide for the village in order to provide parameters for new development to be sympathetic to the local context and rural setting.
2. The impacts it will have: Transport, speed limits and the upkeep of roads and pavements are the domain of Suffolk County Council, who are nudged by the Parish Council. Respondents' comments have been passed on to the Parish Council regarding the potential speeding and traffic volume impacts of the future development.
3. What it will entail: The Neighbourhood Plan policy ONHP10 sets out requirements for affordable housing to be incorporated within the future development. We are required to evidence this need, and are drawing on the results of the Parish Questionnaire of 2020. The doctors' surgery has an external award to aid in its expansion, and we have approached the doctors for their response on what they require. ONHP16 identifies NP support for the expansion of the surgery. ONHP14 requires higher parking standards than national guidelines. We have been told that we need to evidence the higher requirement by looking at where parking is occurring on the roads. We have reported back to the Parish Council the requests for public transport. There were a number of comments about the lack of buses to Woodbridge. We have reported back to the Parish Council the requests for public transport.
4. Is it a viable site: We have had extensive conversations with ESC about the site not being large enough for the allocated number of houses. We have received no assurances that the site will not

be expanded, nor that the numbers must be achieved. We can only include as many precautionary protections as possible: landscape boundary, building height, gaps between buildings, plot line, etc. in order to establish parameters for the proposed development. It is not known what will happen to the buildings which are cut in half by the site boundary. It is hoped that the “Green Gaps” or “Settlement Gaps” identified in ONHP6 will help to resist site creep to the north. The waterlogging of the site would need to be dealt with by civil engineers as part of the proposals, it is a building control matter.

**Green spaces, Biodiversity Net Gain, Allotments, the Community Orchard, expansion of graveyard** provision featured in a number of responses.

The Community Orchard is now to be included and identified within the Neighbourhood Plan and supported as a positive contribution to the village. (it was not in existence when the plan was first written). The Neighbourhood Plan identifies that offset for BNG should be in the Parish wherever possible, and The Gull is identified as a County Wildlife Site and could be a recipient.

The needs for allotments have sadly not been evidenced, and by protecting the fields around the Church from development it is hoped that potential for graveyard expansion is retained.

A very thoughtful response suggested including semi mature tree planting and defining support, guards and watering. This is being included in the Plan.

**Our Heritage Buildings, NDHA, Motte and Bailey, and the Fynn or Lark.**

It was noted that we could do more to identify the heritage buildings in our area, and a new map is being drawn to show them. We have included that NDHA (Non-Designated Heritage Assets) could be identified in the future, but are wary that property owners need to be in agreement.

Suffolk County Council requested that the below-ground heritage be referenced as well as above ground, and this would protect any archaeology around the Motte and Bailey or elsewhere in the parish.

There has been extensive research as to whether the stream which runs on from the Gull in Otley is the Finn, Fynn or Lark. The OS maps and Environment Agency have been contacted, and the definitive answer is that it is the Lark.

**On Site renewables and sustainable measures**, we received knowledgeable and detailed responses on ONHP5 regarding the latest technologies and what to include and require of new sites. We have taken advice from ESC, and will be updating this policy to allow for changes in technologies and use best current terminology.

**Accuracy:** Some very helpful eagle eyed comments on details and accuracy, from the current number of houses to other village assets to include and show support, including bowls, sport and play facilities, as well as details on maps, pictures and text. These points have been implemented and are incredibly useful to create a robust document.

All the support and comments have been incredibly helpful. Thank you! There were a lot of compliments on the plan and praise for the hard work of the Team. This has been very much appreciated.

A12 - East Suffolk Council comments on Otley Neighbourhood Plan  
Regulation 14 draft.

Section of document	ESC comments	NPG Response/Action
General	<p>As the Plan progresses through the stages the accuracy of the mapping and the use of GIS software becomes more important. To avoid mapping issues at later stages it is recommended that the maps, once amended to take account of consultation responses are mapped using GIS software. If you or your consultant do not have the necessary mapping skills</p> <p>to undertake this work please let us know so that we can help. It is much easier to address mapping issues now rather than at later stages.</p>	<p>This offer was accepted.</p> <p>The maps in the Neighbourhood Plan were produced, or improved by ESC mapping department</p>
Paragraph 1.2.3 (and throughout)	<p>The NPPF was revised in 2023 with the current version of the Framework being December 2023. Therefore, all references to the NPPF should be 'NPPF 2023' and any direct and indirect quotes (e.g. paragraph 1.2.4) should be accurate with the December 2023 version of the NPPF.</p>	<p>All existing references to the NPPF have been updated</p>
Paragraph 1.8.1	<p>Amend the paragraph to correct errors</p> <p>'The Strategic Environmental Assessment is carried out by East Suffolk Council in consultation with various stakeholders (Water Authority, Highways, Environment Agency,</p>	<p>Incorrect stakeholders deleted</p>

	Suffolk Wildlife Trust, Natural England and Historic England English Heritage and others). No concerns were raised in the assessment.'	
Section 1.9	Amend subheading 'Habitats Regulations Assessment'	Amended
Paragraph 1.9.1	Amend the paragraph to correct errors  'The Habitats Regulations Assessment is carried out by East Suffolk Council in consultation with various stakeholders (Water Authority, Highways, Environment Agency, Suffolk Wildlife Trust, Natural England and English Heritage and others).'	Amended
Paragraph 2.1.10	Consider providing a link to the Suffolk Wildlife Trust landscape assessment as it is currently not clear where the reader can view this supporting document. Link within Appendix G (Page 62) doesn't take you to a page with the report included.	Already done
Section 2.2 (Heritage)	We support the approach of highlighting some of the local built heritage within this section. We note a spelling mistake in  the current text 'motte-and-bai1ey castles'.	Text corrected
Bullet points under 4.1.1.1	Amend bullet points to accord with structure of Plan:  - Landscape and wildlife	Amended

	<ul style="list-style-type: none"> <li>- Protection of built heritage</li> <li>- Local green spaces</li> <li>- Climate change</li> <li>- Housing and development design</li> <li>- Business, shops and services</li> <li>- Transport and traffic</li> <li>- Further education</li> <li>- Community services</li> </ul>	Now in accordance
Paragraph 4.2.1	Appendix H should be amended to appendix G, and the link to the Otley PC should link to the Suffolk Wildlife Trust survey.	Done
4.2.2	<p>Figure 1 references Landscape Character Types sourced from Suffolk County Council. This is assumed to be a reference to the Suffolk County Landscape Character Assessment (<a href="https://suffolklandscape.org.uk/">https://suffolklandscape.org.uk/</a>). If so, the Suffolk County Landscape Character Assessment should be added to paragraph 4.2.2. If the Suffolk County Landscape Character Assessment was used instead of the Suffolk Coastal Landscape Character Assessment, reference to the Suffolk Coastal Landscape Character Assessment should of course be removed from paragraph 4.2.2. If this is the case it is recommended that reference is made to the Suffolk Coastal Landscape Character Assessment and the landscape character areas relevant to Otley, namely:</p> <ul style="list-style-type: none"> <li>- Otley Hall and Debach Estate Claylands (L4)</li> <li>- Lark Valley (B9)</li> <li>- Culpho</li> </ul>	<p>This section has been rewritten to reflect the two Landscape Character Assessments,</p> <p>See Sections 4.2.16 &amp; 4.2.17</p>

	Culpho and Westerfield Rolling Farmland (N2)	
4.2.5	<p>We suggest the word 'with' should be changed to 'within'. The text currently reads as follows: 'Care must be taken to avoid coalescence of these individual settlement areas with Otley Village and one another'.</p> <p>It is recommended that the reference to policy SCLP10.5 is removed unless there is sufficient evidence that these are identifiable settlements as opposed to parts of the same settlement.</p>	<p>Now Section 4.2.19</p> <p>"Within" added as we feel both apply.</p> <p>In our opinion these are individual settlements, separated by green spaces, contributing to the characteristic open landscape of the area</p> <p>Policy ONHP6 applies</p>
4.2.13	<p>Appendix C helpfully sets out photos of each identified important view. In order to demonstrate the importance of each</p> <p>view the 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>	<p>Descriptions and reasoning added to photos</p> <p>Generally, it is the character of the views that must be preserved, along with key features, rather than the views in their entirety.</p>
ONHP1 – Criterion a)	<p>We suggest amending Criterion a) to: 'Conserve or enhance the biodiversity in the village;' for additional clarity. The word 'conserve' is more commonly used in the context of biodiversity. Moreover, 'or' should be used in place of 'and' as technically it is not possible to both conserve (neutral effect) and enhance (positive effect) biodiversity at the same time.</p>	<p>Policy ONHP1 and supporting text completely revised professionally in light of ESC and Suffolk Wildlife Trust comments</p>

ONHP1 – Criterion b)	<p>Due to the recent updates to Biodiversity Net Gain requirements (BNG) set by national legislation, we strongly suggest that reference to additional BNG requirements should be removed.</p> <p>There is also potential to make a reference to the types of features the parish would like to deliver instead (e.g. Swift bricks).</p>	<p>Reference to BNG removed from b)</p> <p>There are plans to update the plan with a design code and elements like this could feature in that update.</p>
ONHP1 – criterion c)	<p>We support the approach set out in Criterion c) but note that the policy requires more clarity on what scale would be appropriate in order for this policy to be applied in practice.</p> <p>Additionally, we note that there is some repetition with Policy ONHP8 and the plan would benefit from wildlife corridors being captured in just one of the policies.</p>	<p>It is reasonable that scale for a single dwelling development would be different to a significant development of 20+ dwellings for example.</p> <p>ONHP1 makes provision for wildlife corridors of appropriate scale to the development whereas ONHP8 provides a more detailed provision of what a wildlife corridor is expected to be and provide.</p>
ONHP1 – criterion d)	<p>We strongly recommend that criterion d) be deleted as reference to BNG requirements additional to those set out in legislation should be avoided as this is now already covered by national legislation. It is likely that additional BNG requirements that differ to legislation would be undeliverable, unenforceable and won't deliver anything much for biodiversity.</p>	<p>The potential difficulties of delivery should not outweigh the ambition to deliver more than a regulatory minimum.</p> <p>The overall statement is that development should "seek to" provide the policy elements. If a developer were to show through a viability assessment that 20% BNG was not deliverable or that a different amount of BNG is deliverable then that is reasonable.</p>
ONHP1 – last sentence	<p>The latest national BNG requirements allow for offsite habitat creation. This</p>	<p>Last sentence reworded</p>



	<p>sentence must be deleted as it would restrict development sites that are BNG compliant through offsite habitat creation.</p>	
ONHP2	<p>We suggest removing the capital letters for 'Very Special Circumstances'.</p> <p>The policy states that, 'New development that adversely affects the landscape shall be refused unless Very Special Circumstances are demonstrated'. The use of 'adversely affects the landscape' alongside 'very special circumstances' could theoretically be very limiting. We would recommend using the same measure as the Local Plan policy which is a 'significant adverse impact'</p>	<p>VSC removed</p> <p>Text amended</p>
ONHP2 Criterion d)	<p>We suggest re-considering the approach to key views as when the policy is read alongside Appendix C, it appears that this is aimed at almost all views into the parish from the outside. This Policy may be more effective by being focussed on key views out and views in from the surrounding landscape that show the village in its landscape context. Additionally, the arrows used are thin and could potentially be interpreted as a very narrow scope. This could be improved by plotting these arrows as polygons to make it clearer as to how much of the parish is a key view. The key features of each key</p>	<p>Text of ONHP2 amended</p> <p>Polygons added to map</p>

	<p>view should also be set out, logically in Appendix C next to the photo of each view.</p> <p>Views of the village from the village approaches are set out in Appendix C. The policy could benefit from some streamlining by combining b), c), and d) into one policy criterion aimed at preserving the key features of the identified views in Appendix C.</p> <p>However, b) seeks to go beyond the identified key views and preserve nearly all views, important or otherwise. This approach is not supported and lacks justification. As set out above, identified key views must be justified and their key features explained. To claim all views are special would inevitably result in nothing being special.</p>	
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Section 4.3 (Protection of Built Heritage)	<p>The Council appreciates that the NP Group has considered the merits of identifying NDHAs, and has concluded that this</p> <p>will not be undertaken. However, the Design and Heritage Team encourage consideration of identifying a list of Non-Designated Heritage Assets and including a supporting policy for this.</p>	<p>The Neighbourhood Plan Group has serious concerns regarding listing residents homes as NDHAs, and has decided not to pursue identification at this stage on at this stage on the grounds of privacy issues. However this will be kept under review</p>
Policy ONHP3	We support the general approach of this policy but would like to note our	

	<p>concern over the boundary mapped in Figure 4-1. The setting of the church has the potential to be much wider than mapped and it may be more effective to have this covered by just the policy and officer interpretation without a map. However, if a mapped approach is preferred, a good example of this can be seen in the Mutford Neighbourhood Plan (See pages 28 and 40). Link: <a href="#">Mutford-Neighbourhood-Plan.pdf (eastsuffolk.gov.uk)</a></p>	<p>We feel that a map gives greater certainty to applicants. Inside the boundary, policy applies, outside it doesn't</p>
4.4.8	<p>Part of this area proposed for identification as a local green space includes parking spaces. These parking spaces do not meet the NPPF criteria and must be removed from the red hatched area of the map.</p>	<p>Parking spaces removed</p>
ONHP4	<p>We note the evidence provided in paragraphs 4.4.5-4.4.8 regarding how the NP Group considers each space to meet the NPPF criterion. However, it is recommended that evidence is set out for each of the 3 NPPF criteria for each space. A good example of a Local Green Space evidence base document can be seen in the Reydon Neighbourhood Plan. Link: <a href="#">Local-Green-Space-Evidence-Base.pdf (eastsuffolk.gov.uk)</a></p>	<p>Local Green Spaces individually evidenced</p>

	<p>The criteria for identifying Local Green Spaces is set out in paragraph 106 in the NPPF 2023 as follows:</p> <p>a) in reasonably close proximity to the community it serves;</p> <p>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>c) local in character and is not an extensive tract of land.</p>	Local Green Spaces individually evidenced according to NPPF criteria.
ONHP5	We recommend including a reference to the ESC Sustainable Construction SPD (2022). Additionally, it would also be beneficial to include some examples of good practice in the supporting text.	ONHP5 has been rewritten to take account of all comments
ONHP5 - criterion b)	<p>We suggest that reference to heat pumps and solar hot water be moved out of this criterion to avoid confusion. Technically heat pumps and solar hot water do not create renewable energy.</p> <p>The criterion also uses the term 'high levels' but this is not clear to what 'high levels' actually entails. There are limitations to what planning policy can require and the policy should be deliverable.</p>	<p>Rewording to position the policy as reduction in energy use as part of sustainable construction.</p> <p>"High levels of" changed to "proposals for"</p>
OHHP5 – criterion c)	It would be useful to explain what is contained within a climate change statement. This can be in the supporting	Term "Climate Change statement" corrected to the widely understood term

	text.	"Energy Impact Assessment"
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ONHP5	We would like to raise the point that careful consideration is needed for the wording of this policy to ensure that it is effective and clear. For example, it needs to be clear whether criterion a) is or is not requiring every new development to include a green roof (for example). Expecting every development to have a green roof may not be deliverable.	Policy reworded for clarity.
4.6.1.2	Amend the first sentence of the paragraph as follows:  'The "Call for sites" by Suffolk Coastal District Council (now ESC) in 2017/2018 in preparation for the Strategic Housing and Economic Land Availability Assessment (SHELAA) input to the Local Plan review, produced a number of possible development sites in Otley to contribute to the total housing supply requirement for East Suffolk from 2018 to 2036.'	Amended
ONHP6	The Policy should directly link to the 'distinct settlement' map in the appendices, which should presumably be Appendix C. The map is aims to show what the neighbourhood plan considers distinct settlements across the parish, with the policy covering all gaps between them. We would suggest the neighbourhood plan group	Now Appendix D

	<p>considers 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>It is important to recognise that the Local Plan includes policies that allow certain developments in the countryside such development in clusters (SCLP5.4), affordable housing exception sites (SCLP5.11), and the site allocation (SCLP12.58). These policies would allow development that would to some degree coalesce the 'two distinct sections of the village' and potentially expand the distinct settlement groups. The NP cannot prevent development in accordance with these policies as to do so would not be in general conformity with the strategic policies of the Local Plan. Thus, in order to retain ONHP6 in the NP, it is recommended that explicit reference is made to policy SCLP5.3 and other policies such as SCLP5.4, SCLP5.11, as well as the allocation policy of SCLP12.58, as exceptions to ONHP6.</p>	<p>The open characteristics of the landscape are demonstrated within the Plan itself This is supported by SCLP10.4 Landscape Character, and SCLP10.5 Settlement Coalescence</p>
4.6.2.7	We suggest re-considering the wording of this sentence so that it is clearer and easier to read.	Removed
ONHP7	We support the intention to produce a design code,	

	<p>however when a design code has been produced, we strongly recommend that there is an opportunity for ESC and other relevant consultees to provide comments on the Design Code before a Regulation 16 consultation is undertaken. We consider that it is important that the design code is subject to the same level of scrutiny and review as the rest of the plan as it is what underpins this policy.</p>	<p>The Neighbourhood Plan Group have decided to postpone the production of a Design Code at this stage.</p>
ONHP7	<p>‘The code shall provide: ...’</p> <p>This wording does not relate to a policy to apply to planning applications but the anticipated content of the future design code. The policy must be amended to relate to development proposals. The subsequent criteria will require amending accordingly.</p>	<p>See above</p>
ONHP7	<p>We suggest rewording the first sentence to ‘development proposals of high-quality design shall be supported’ as it is difficult to quantify what the highest quality of design is. Additionally, there is reference to and ‘highest design quality’, ‘high quality design’ and ‘good design’ which potentially sets three different bars. A consistent approach would be more effective.</p>	<p>Highest changed to high as recommended.</p>
ONHP7 – criterion b)	<p>It will likely be difficult to achieve ‘footways with grass</p>	

	<p>and/or landscape verges including trees and hedges' on all new streets. However, this does not necessarily mean the streets would be poorly designed. Thus, we instead recommend making reference to the Suffolk Street Design Guide: Suffolk Design: Streets Guide - Suffolk County Council), which is a high quality documents and used to ensure high quality street design and movement frameworks, including in relation to landscaping in streets.</p>	<p>Reference to Suffolk Street Design Guide: Suffolk Design: Streets Guide - Suffolk County Council included.</p>
<p>ONHP7 – second sentence and penultimate paragraph</p>	<p>'Proposals which garner the support of the Parish Council for their design should be approved by the Local Planning Authority.' 'Development..... or which is not considered good design by the Parish Council, shall be refused.' This approach would be conflicting with the existing Development Management process where the Local Planning Authority is the decision maker. East Suffolk Council objects to this policy for this reason and would therefore want these sentences deleted or amended.</p>	<p>ONHP7 amended</p>
<p>ONHP7 – last paragraph</p>	<p>We suggest that this paragraph needs more clarity to demonstrate what level of development this should be applied to.</p> <p>For example, this requirement would not be suitable for a householder extension</p>	<p>Updated to 2 or more dwellings</p>



	In addition, the information you are expecting to be provided with applications to demonstrate acceptable utility provision should be set out in the supporting text.	
ONHP8 – Criterion a	We consider that underpinning evidence would be important to underpin a requirement for hedging between residential properties. Additionally, this requirement could be expanded to other housing types in addition to just 'detached properties'. We suggest that this is included within the design code.	ONHP8 amended
ONHP 8 – Criterion b,c,d & e	We note that there is some repetition with policy ONHP1 and consider that these criteria would benefit from some streamlining. ONHP1c) should be removed as it adds no value to ONHP8. Retaining ONHP1c) creates unnecessary policy duplication.	ONHP1 has been rewritten
ONHP8	We suggest removing any reference to Biodiversity Net Gain to avoid relating the policy requirements to the requirements set out by national legislation.	BNG removed from ONHP8.
ONHP10	We support the approach of this policy as it allows for a varied housing mix that would be supported with localised evidence that suggests a	

	<p>greater need for this type of housing mix. However, we note that it is not clear that there is evidence behind this policy to support this approach. The 10% requirement for bungalows does not appear to be sufficiently evidenced. If the purpose is to support those with limited mobility, this is already taken care of through the 10% to M4(3) standards.</p>	<p>ONHP10 has been amended</p>
ONHP10 – criterion e)	<p>Criterion e) only appears to relate to development proposals for or including specialist accommodation. However, the opening sentence of the policy relates the criteria to all residential development. Criterion e) therefore requires modification.</p>	<p>Criterion e) removed.</p>
ONHP10 – criterion f)	<p>SCLP5.11 sets out the expected tenure split of affordable housing, which includes affordable rent/social rent, and other forms of affordable housing. The NPF also require First Homes form part of affordable housing delivery. Criterion f) therefore does not add to existing planning policy and should consequently be removed to avoid confusion and unnecessary policy duplication.</p>	<p>Reworded to add value, and compliance</p>
4.6.4.4	<p>Please kindly remove the text from the email of an ESC planning officer. It was not provided with the understanding it</p>	<p>Removed</p>

	would be directly used in the Neighbourhood Plan. You do not have permission to reproduce this text in the Neighbourhood Plan.	
ONHP11 – criterion g)	<p>Legislation allows for BNG to be provided off site in certain circumstances and it therefore will not be possible to require on</p> <p>site BNG be provided through the policy. Criterion g) must therefore be removed.</p>	ONHP11 amended
ONHP11 – criterion h)	It is not considered necessary for dwellings along the western site boundary to be restricted to one storey to preserve the amenity of neighbouring residents. Furthermore the because of the angle and shape of the site it is not clear which boundary the western boundary actually is.	ONHP11 amended to remove single storey reference.
ONHP11 – criterion j)	It is highly unlikely that the density of the development will conform to that of existing development in the village and so this criterion is unlikely to be effective.	The goal is to maintain the character of the village and we believe the criterion is valuable. (Has been used in other Plans and is a recommended/example local character policy criterion by Locality)
ONHP11 – criterion k)	It is not clear that there is any evidence to support the requirement for the development to provide land for an expansion to the Otley Surgery. It is not clear whether an expansion to the Otley Surgery cannot be contained within the existing surgery site. It is not clear	<p>Confirmed with Suffolk and North East Essex Integrated Care Board that there are no plans to expand Otley Surgery</p> <p>Item removed</p>

	<p>how much land, if any, would be needed beyond the Otley Surgery boundary for any expansion.</p> <p>It is not clear whether an assessment of implications of such a requirement on the development has taken place and if so, what the likely implications would be (e.g. financial, deliverability). We would also ask whether the ICB had been consulted on this requirement.</p>	
ONHP12 – criterion a	We suggest deleting the words 'of small scale'.	Retained Survey quite clear that village supports small scale business development, and would not support large scale development, nor would the Local Plan
ONHP12 – criterion b	<p>Criterion b), as currently worded, would prevent all development as any development will inevitably create, however small,</p> <p>some air, noise or light pollution. We suggest amending criterion b) as follows: 'New developments must be sensitive to their surroundings and avoid significantly adverse air, noise and light pollution impacts;'</p>	Criterion b) modified
ONHP12 – criterion c	Criterion c) requires that there are no significant impacts on roads within the parish. This is not in general conformity with SCLP7.1 which requires that any significant impacts on the highway network are mitigated. Criterion c) must therefore be amended or removed. Given	

	<p>that this point is addressed in SCLP7.1 the Council recommends removing criterion c) and relying on SCLP7.1. In addition, SCLP7.1 sets thresholds for the submission of Transport Statements and Transport Assessments. ONHP12 must be in general conformity with this approach. While the Council agrees with the importance of these matters, given the coverage of these matters in SCLP7.1, it is recommended that the NP does not address the thresholds as to when a Transport Statement or Transport Assessment be submitted.</p>	Criterion c) amended
ONHP13 - criterion c	We note that this criterion may be difficult to achieve for single dwelling developments.	Amended to apply to "Major" developments
ONHP14	<p>We have concerns on whether this approach is adequately justified/evidenced. The aim is to provide more car parking spaces because of poor connections, but this embeds car dependency and encourages greater car use. The NP Group must consider the implications of this policy, and all other NP policies, on the deliverability of the site allocation (SCLP12.58). How many extra car parking spaces would be required by this policy compared to the SCC parking guidance? And how much land would this take</p>	<p>This is a policy of great importance to the NPG. Public transport is seldom available and not at viable times. Navigating to and from Otley without a private car is almost impossible and certainly not safe</p>

	from the site allocation?	
Appendix A	It would be helpful to show the parish boundary/neighbourhood area on the aerial map on page 46.	New map supplied by ESC
Map of distinct settlements across the parish	This map should be separate appendix and linked to the relevant policy.	New map supplied ny ESC (Appendix D)
Appendix C	<p>The key features of each identified key view should be explained in order to demonstrate the importance of each view and</p> <p>to ensure development is designed to preserve or enhance the key features of the key views.</p>	Descriptions added
Appendix E	Currently references policy ONHP12, but should be ONHP11.	Corrected
Appendix G	<p>The Otley PC webpage linked to does not contain a link to the Suffolk Wildlife Report. The link should be amended to:</p> <p><a href="http://www.otley.onesuffolk.net/neighbourhood-plan/">http://www.otley.onesuffolk.net/neighbourhood-plan/</a></p>	Amended
Appendix J	Should presumably be Appendix H, unless Appendices H and I are missing.	Appendix J is now correct

## A13 - Suffolk County Council comments on Otley Neighbourhood Plan Regulation 14 draft.

Section of document	SCC comments	NPG Response/Action
<i>Chapter 2.2 – built heritage</i>	<p><u>Archaeology</u></p> <p>Overall, the Suffolk County Council Archaeological Service (SCCAS) are pleased to see that heritage has been given thought and consideration in the plan.</p> <p><i>Chapter 2.2 – built heritage</i></p> <p>SCCAS would suggest a re-wording of the chapter title to either just '<u>Heritage</u>' or '<u>Built and Below Ground Heritage</u>' as this will more suitably cover the range of heritage assets present in the area,</p> <p>including the below ground archaeological remains at the Scheduled Motte as described in this paragraph. Nice inclusion of detailed description of Motte Castle 'The Mount'. We would recommend adding in the first sentence of the chapter that this is a Scheduled Ancient Monument, and that the Historic England Reference number is 1017916.</p> <p>Overall, this is a good historic background and could be enhanced by a search of the Suffolk HER. The inclusion of an HER search in map format within this chapter would be a useful addition to show all heritage assets (above and below ground) in the area.</p>	<p>"Built and Below-ground Heritage" adopted</p> <p>"Scheduled Ancient Monument" added along with Historic England reference number</p>
<i>4.3 Protection of Built Heritage</i>	<p>As with chapter 2.2 SCCAS would suggest re-wording the chapter title to '<u>Protection of Built and Below-ground heritage</u>' to include archaeological features.</p> <p>Chapter 4.3 could also highlight the need for developments to take heritage assets into consideration and the need for heritage statements to be submitted with planning proposals which relate to known heritage assets such as the listed buildings and scheduled ancient monument within Otley and those identified on the Suffolk HER. This section would also benefit from adding a statement regarding below-ground heritage assets. SCCAS would encourage the addition of a note within this section along the lines of:</p> <p><u>"Suffolk County Council Archaeological Service (SCCAS) would advise that there should be early consultations of the Historic Environment Record (HER) and assessment of the archaeological potential of any potential development site at an appropriate stage in the design stage, in order that the requirements of NPPF and East Suffolk Local Plan are met."</u></p>	Wording adopted

	<p><u>SCCAS as advisors to East Suffolk Council would be happy to advise on the level of archaeological assessment and appropriate stages to be undertaken."</u></p> <p>Having something along the lines of the above would provide clarity to developers for any future development sites and. In addition to this, the plan could also highlight any level of public outreach and public engagement that might be aspired from archaeology undertaken as part of a development project, as increased public understanding of heritage sites is an aspiration of the NPPF.</p>	
4.3.2	<p>We note than in 4.3.2 the NP group have considered whether any non-designated heritage assets are in the area but have decided not to include this in the NP. Should the NP group decide they do wish to consider the presence of non-designated heritage assets they might want to consider whether the information from the Suffolk Farmsteads Project would help in identifying non-designated heritage assets. SCC Archaeological Service have been reviewing Farmsteads throughout Suffolk, as part of a project funded by Historic England. Entries from the project can be seen via the Suffolk Heritage Explorer <a href="https://heritage.suffolk.gov.uk/farmsteads">https://heritage.suffolk.gov.uk/farmsteads</a>. In addition, the NP group might wish to consider the potential impacts of the conversion of historic rural buildings some of which could be non-designated heritage assets.</p>	<p>The NPG has decided not to include NDHAs at this stage, over concerns of privacy issues</p> <p>However this will be kept under review</p>
<i>Policy ONHP3 Conserving the setting of the church</i>	<p>It is good to see that preserving the setting of the church has been given a high priority.</p>	
<i>Site Allocation – Land Adjacent to Swiss Farm, Otley</i>	<p>The site lies beyond the edge of the historic core of Otley, centred on a farmstead of unconfirmed origin date. A condition to secure a programme of archaeological work may be appropriate, comprising evaluation in the first instance. SCC Archaeological Service welcome early discussion.</p>	<p>Noted, included</p>
<i>Education</i>	<p>SCC, as the Education Authority, has the responsibility for ensuring there is sufficient provision of school places for children to be educated in the area local to them. This is achieved by accounting for existing demand and new developments. SCC, therefore, produces and annually updates a five year forecast on school capacity. The forecast aims to reserve 5% capacity for additional demand thus the forecasting below may refer to 95% capacity. The information below is to inform the Neighbourhood Planning Group's understanding of educational provision in the Plan Area and does not need to be included in the Plan.</p> <p><i>Primary Education</i></p> <p>The primary education catchment area for Otley Parish is</p>	<p>Number on roll corrected</p>



	<p>Otley Primary School. The school is not currently forecast to exceed 95% capacity during the forecast period.</p> <p><i>Secondary Education</i></p> <p>The secondary education catchment for Otley Parish is Farlingaye High School. The school is forecast to exceed 95% capacity during the forecast period. The proposed strategy for mitigating this growth is via future provision of additional secondary accommodation in the local area.</p>	
2.1.7	<p>SCC notes that paragraph 2.1.7 states that there are 60 pupils at the primary school. However, SCC's school infrastructure records indicate that the net capacity of the school is 70, and the current number on roll is 48.</p>	Number on roll corrected
ONHP16	<p>SCC notes Policy 16 community services, which indicates the desire for expansion of the primary school. There are no plans to expand the primary school based on current pupil forecasting.</p>	Noted but may change with increased population.
Flooding Policy ONHP 1	<p>Suggested additional wording as follows:  <u>e) Make provision of green open SuDS features to enhance water quality and biodiversity</u></p>	ONHP1 revised and believed to address these issues
Flooding Policy OHNP 7	<p>Suggested wording (insert between b/c):  <u>Where surface water drainage infrastructure is proposed this should be delivered through the provision of open, green SuDS that promote biodiversity and amenity value in addition to volume and pollution control</u></p>	ONHP7 revised and believed to address these issues
Policy ONHP11 Land Adjacent to Swiss Cottage Farm	<p>c) maintain the open cut ditch to the western edge of the development <u>and where possible integrate the ditch into the open space provision of the development, maintaining a 3.5m easement.</u></p>	ONHP11 revised and believed to address these issues
2.1.6	<p><u>Health and Wellbeing</u></p> <p>SCC welcome the population data detailed in paragraph 2.1.6. We recommend expanding upon the data to highlight age groups, using the following wording:</p> <p><u>The population which is around 650 inhabitants has a bias to a more mature age group, 68% of adults being 45 years of age or over and 31% being over the age of 60 (2020 figures). The 2021 Census shows Otley to have a population of 710. The data indicates 30.8% of residents are aged 65+ which is significantly higher than the England average at 18.4%. 50% of residents are aged 20-64, lower than the England average of 58.4% and 19.4% of the population are aged 0-19 years, lower than the England average of 23%.</u></p> <p><u>The data indicates a need for any future developments to be inclusive to the needs of an ageing population, with homes</u></p>	wording adopted with minor editing

	<u>being adaptable and outdoor spaces being well lit, safe and easily navigable, neurodiversity and dementia friendly. It is important to ensure the needs of all residents are catered for, recognising the likely increase of co-morbidities as people get older.</u>	
ONHP13 a) and 3.1.1	SCC suggest rewording the term 'sustainable travel' to 'sustainable <u>active</u> travel' in paragraph 3.1.1 and ' <u>sustainable active transport</u> ' to Policy ONHP13 a).	Not adopted. The narrow B classification HGV routes through Otley render active travel (eg cycling) positively dangerous .
ONHP10	<p>Policy ONHP10 quotes in item c) – 'For major developments, at least 10% of all new dwellings meet Building Regulations Optional Standard M4(3) for disabled access;'.  Please note that in accordance with the March 2015 Written Ministerial Statement<sup>1</sup> that neighbourhood plans should not set additional technical standards.  Therefore, SCC recommend this is rephrased using the following wording: <u>'For major developments, particular support will be given to proposals that offer a fair proportion of dwellings that meet Building Regulations Optional Standard M4(3) for disabled access;'</u></p>	This wording has been adopted
Libraries	<p>Provision of a library service is a statutory duty. The Public Libraries and Museums Act 1964 (c. 75) is an act of the United Kingdom Parliament. It created a statutory duty for local authorities in England and Wales "to provide a comprehensive and efficient library service for all persons".</p> <p>The catchment library for Otley is Debenham Library which is currently 24% of the modal size for the population of the catchment. This is supplemented by a mobile library service which has two stops in the area. Any development in the area would increase demand on these services and we would seek investment to mitigate the additional provision required.</p>	Added to text
Minerals and waste	<p>Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means that SCC makes planning policies and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan,<sup>2</sup> adopted in July 2020, which forms part of the Local Development Plan.</p> <p>SCC notes that the neighbourhood plan does not make any</p>	Minerals and Waste section added at 1.3.2

	<p>reference to the Suffolk Minerals and Waste Local Plan, and this should be added into section 1.3 after the reference to the Suffolk Coastal Local Plan (SMWLP).</p> <p><sup>1</sup><a href="https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488">https://questions-statements.parliament.uk/written-statements/detail/2015-03-25/HCWS488</a></p> <p><sup>2</sup><a href="https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/">https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme/</a></p> <p>The SMWLP should be considered with in the national and local planning policy context, as it is a policy document in the same way the district's local plan is a policy document, and all its policies need to be considered where applicable.</p> <p>Within the plan boundary is a safeguarded facility (AW146 – Otley STW – Anglian Water, the safeguarding policies in the SMWLP will apply (Policy GP10). In addition to this, the south of the settlement is within the Minerals Consultation area and development in this area will have to adhere to the policies in the SMWLP (again Policy MP10 safeguarding, is the main policy consideration here - but there are others) [Note to the authors of the plan: if they wish to discuss safeguarding areas or policies within the SMWLP then please contact <a href="mailto:Ross.walker@suffolk.gov.uk">Ross.walker@suffolk.gov.uk</a>]</p>	-
<p><i>Policy ONHP1 – Ecology and Biodiversity</i></p>	<p><b>Natural Environment</b></p> <p><i>Policy ONHP1 – Ecology and Biodiversity</i></p> <p>This policy could be stronger. SCC would suggest replacing second word 'to' with '<u>which</u>'.</p> <p>Part a) is very broad; examples and principles could be set out on how the aims can be achieved. Part b) needs to be brought in line with part d), which should refer to the national requirements at any given time.</p>	<p>Policy ONHP1 has been revised</p>
<p><i>Policy ONHP2 - Landscape and Amenity</i></p>	<p>Please consider the following change:</p> <p>New development that <del>adversely affects the landscape</del> <u>results in significant adverse landscape and visual effects</u>, shall be refused unless Very Special Circumstances are demonstrated.</p> <p>Part a) will be difficult to achieve under all circumstances, and room should be left for mitigation and, as a last resort, compensation, where impacts and effects cannot be avoided.</p> <p>The grouping of views in para 4.2.13 and Appendix C is understandable, but it may be more helpful and clearer, if views were individually identified with a number, title, description, photo and location map and shown on an overall map where the views are referenced by their numbers.</p>	<p>ONHP2 has been altered and we believe now covers these concerns.</p> <p>Photos have had descriptions and justification added, and numbered on the relevant map.</p>

	<p>Part d) of ONHP 2 is very high level and greater protection could be achieved through a stand-alone views policy that spells out what is expected from development that may affect key views and when development would be considered unacceptable.</p> <p>Paras 4.6.2.2-4.6.2.5 strongly relate to views yet are embedded into Section 4.6.2 New development. It should be considered, if Section 4.6.2 as a whole could be brought closer to ONHP2.</p>	
<i>Policy ONHP3 Conserving the setting of the church</i>	<p>An unusual policy, but in landscape terms this could be very effective. It is similar to the designation of settlement gaps between settlement clusters within a parish. The wording of the policy is very strong and unambiguous. It may need to be tested in planning terms, and it may be necessary to achieve the aims of this policy through other means (Key Views/Settlement Gap/ Local Green Space policies).</p>	<p>This policy has been modified as has the supporting text 4.3.4 and 4.3.5</p> <p>The views of the church are deemed to be important, as indicated in our Landscape and Amenities section (policy ONHP2) and as indicated in Appendix C.</p>
<i>Policy ONHP4 Local Green Space</i>	<p>Paragraphs 4.4.1-4.4.3: Please note, the Local Green Space (LGS) are dealt with in paragraphs 105-107 of the NPPF 2023.</p> <p>SCC welcomes the designation of Local Green Spaces as part of neighbourhood plans, as this supports the ongoing work to make Suffolk the Greenest County<sup>3</sup>. The LGS should also be shown in a Policies map.</p> <p>A brief description and location map for each of the 4 proposed Local Green Spaces is presented within the main text of the NP document. There is however no clear justification of how the proposed sites meet the NPPF criteria; there are no photos provided; the descriptions do not provide the sizes of the sites</p> <p>The context map in Appendix F – Local Green Spaces in Context includes the fields to the west of St Mary's Church which are protected under ONHP3, but this space may also qualify as a LGS (the parish may wish to consider which policy will offer the strongest protection).</p> <p>SCC is concerned about the inclusion of verges into LGS designations and does not consider that the evidence provided is strong enough to justify this.</p> <p>It is not clear how, under the criteria which is set out in the NPPF, that roadside verges can be shown to be 'demonstrably special' by meeting the qualities of being a place for; tranquillity, recreation, ecological or wildlife significance,</p>	<p>Criteria added to each LGS</p> <p>Verges are still included as the War Memorial is situated there, and those around Miller's Way give a "village green" feel to the centre of the village. However a note has been added acknowledge the statutory right of access for maintenance etc.</p> <p>A policies map has been produced in addition to the "LGSs in context" map</p> <p>Paragraph references to NPPF have been dropped due to</p>

	<p>historic significance, and/or beauty.</p> <p>SCC considers these areas 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.</p> <p>Site a) in Policy ONHP4 is identified as “around and including village hall”. However, a village hall is not a Local Green Space it is a building, the text should be amended. Sites c) and d) should not be designated as LGS.</p>	expected reissue of NPPF.
<i>Policy ONHP6 – Green Gaps</i>	<p>SCC welcomes this policy and recommends the term “<u>Settlement Gaps</u>”, as this is a more recognised term for what is described here. The policy would be stronger, if it was to identify the areas that are to be kept free from development, by showing them on a map, such as the Policies map.</p>	“Green Gaps” terminology retained to avoid confusion with settlement boundaries Green Gaps map produced Appendix D
<i>Policy ONHP8 Site and Plot boundaries</i>	<p>This policy may be more accurately titled “<u>Wildlife corridors and green boundary treatments</u>”. Part b), recommended to replace ‘shall’ with ‘<u>might</u>’.</p> <p>Part c) and d) A 2m wide corridor seems restrictive; how will this be accessed and maintained? 5m seems a good minimum width no matter the size of the development. It may be better to find a site appropriate wildlife corridor as per part b). If this is applied, then a differentiation in requirements is likely to occur, as a bigger development is likely to need to go further to create connectivity for wildlife corridors.</p> <p>Part e) While wildlife corridors can sometimes provide screening, this is not their primary function.</p> <p>Penultimate paragraph, suggested amendment:  ‘New hedges should be made up of <u>at least</u> 5 different native species, ...’</p> <p>Last paragraph; While protection in perpetuity is desirable, this may not be legally possible. Even, where newly created wildlife corridors are part of the mandatory Biodiversity Net Gain requirements of a development, they would need to be maintained for 30 years only.</p>	Policy revised addressing issues raised.
<u>Transport</u>	<p>SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe as well as providing and managing flood risk for highway drainage and roadside ditches.</p>	

<i>Policy ONHP12 Business and Commercial</i>	Part 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.	Impact statements and traffic assessments included in policy
paragraph 4.8.8	Regarding paragraph 4.8.8, all new development should accord with Suffolk Guidance for Parking <sup>4</sup> (2023 or current version).	4.8.8 remains unaltered as previously referenced see 4.8.10
<i>Policy ONHP13 Transport and Traffic</i>	Fully support the policy and would recommend that it references Suffolk Guidance for Parking (2023 or current version) and regarding EV charging, Building Regs Part S. Non-residential Development should also provide EV charging infrastructure in accordance with Suffolk Guidance for Parking (2023 or current version). A – d) Generally support these aims and to support them, SCC Transport Strategy will look to procure highway safety and sustainable travel improvements from development wherever possible.	No action required!
<i>Policy ONHP14 Provision for Car Parking</i>	Part h) Noted that the policy exceeds the Suffolk Guidance for Parking (2023 or current version) vehicle parking requirements. We could only require the SGP levels and would recommend that the policy aligns with Suffolk Guidance for Parking (2023 or current version). Cycle storage and space dimensions accord with Suffolk Guidance for Parking (2023 or current version).	ONHP14 aligns more closely with the current version of Suffolk Guidance for Parking but remains unaltered for reasons explained in 4.8.10
<i>Policy ONHP16 Community Services</i>	Again, parking should accord with Suffolk Guidance for Parking (2023 or current version).	Again see 4.8.10
<i>Chapter 5 References</i>	Reference 6 should be updated to reference Suffolk Guidance for Parking (2023 or current version) and also referenced as set out above.	Included.
	Recommend that all new development accords with Suffolk Design: Streets Guide <sup>5</sup> with regard access and development layouts.	
	SCC also notes that the Local Green Space policy has designated some highways verges. Highway verges can be subject to visibility and have standardised maintenance requirements so may not be suited to this use.	Previously addressed
<i>General</i>	Inconsistency: paragraph 4.6.1.3 states “Swiss Farm Cottage” whereas the rest of the plan states “Swiss Cottage Farm”.	Corrected

<i>Policies Map</i>	<p>“Policies map” is referred to in the plan (policies ONHP2, ONHP6 and ONHP11), however there is not actually a policies map in this plan. It is recommended that the plan creates a Policies Map, which clearly displays the important features mentioned within the plan policies in once clear and consolidated image.</p> <p>This map should display the following: parish boundary, settlement boundary, all allocated housing sites, Listed buildings and/or heritage assets, designated Local Green Spaces, important views, Public Rights of Way, and any other important features or facilities of the parish.</p>	Policies map produced
<i>General</i>	<p>Inset maps may be used to show closer detailed parts of the parish, where identified features would be lost and/or hard to read on the overall Policies Map.</p>	Noted.

## A14 - Otley Neighbourhood Plan Consultee Responses to Regulation 14 consultation

### Other consultees (always contact)

Organisation	Detail	Response/Action
Adjoining Parish Councils	Framsden Swilland with Ashbocking Clopton Helmingham	No issues No response No response No response

Organisation	Detail	Response/Action
East Suffolk Council	addressed on page 40	Multiple
Natural England	Correspondence attached (See A16-2)	No issues General advice
Environment Agency	Correspondence attached. (See A16-8)	Limited resources, unable to comment specifically. General advice
Historic England	Correspondence attached (See A16-1) 1) Produce glossary of terms used in historic environment terminology and legislative detail 2) Include a map of heritage assets within the parish	1) Not considered within remit of NP 2) Implemented
Suffolk County Council	addressed on page 59	Multiple
Suffolk Preservation Society	No response	N/A
Anglian Water	No response	N/A
Essex and Suffolk Water	No response	N/A
Mobile UK	No response	N/A
Suffolk and North East Essex Integrated Care Board	No response Approached later by NPG regarding possible expansion of Otley Surgery. No plans currently	N/A



UK Power Networks	No response	N/A
National Grid and National Gas	Response from Avison Young pp Correspondence attached (See A16-5) No high pressure or other infrastructure within NP area	N/A

## Other Consultees (where applicable)

Organisation	Detail	Response/Action
Adjoining District Councils	Mid Suffolk (Babergh and Mid Suffolk District Council) planning department No response	N/A
Suffolk Wildlife Trust	Correspondence attached (See A16-6) Suggested increase in BNG target etc	Professional advice sought. Policy and evidence text rewritten professionally
Homes and Communities Agency	Acknowledgement only (Email)	N/A
Network Rail	No response (No assets in NP area)	N/A
National Highways	Correspondence attached (See A16-7) No comment, no strategic highways in NP area	N/A
Suffolk Police Designing Out Crime Officer	Correspondence attached (See A16 -3) Referred to generic "Secure by Design" info	N/A
Sport England	Correspondence attached (See A16-4) General generic advice	N/A

## A15 - HRA and SEA reports from East Suffolk Council.

Habitat Regulations Assessment (HRA) relating to the Otley Neighbourhood Plan. Screening of the Otley Neighbourhood Plan has concluded that the plan will not lead to likely significant effects on protected Habitat sites either alone or in combination with other plans.

Strategic Environmental Assessment (SEA) screening opinion relating to the Otley Neighbourhood Plan. The draft screening opinion concludes that no further SEA work is required.

The full HRA and SEA reports can be found at: [Link to documents on Parish Council Website.](#)

## A16 – Emailed responses under regulation 14 consultation.

### 1. Historic England



Mr Gavin Grant

Direct Dial: 07766 206210

Otley Neighbourhood Plan Team

Our ref: PL00795522

12 April 2024

Dear Mr Grant

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of this Neighbourhood Plan.

We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time.

We would, however, make the following brief suggestions:

- Inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.
- A map highlighting the designated heritage assets within the Parish

We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Suffolk County Council.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on



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Telephone 01223 582749  
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.



the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Ross McGivern  
Historic Places Advisor  
[ross.mcgivern@historicengland.org.uk](mailto:ross.mcgivern@historicengland.org.uk)

cc:



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*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.*

## 2. Natural England

### Annex A –Natural England general advice

#### Protected Landscapes

Paragraph 182 of the [National Planning Policy Framework](#) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 183 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. [Section 245](#) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

#### Wider landscapes

Paragraph 180 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

#### Biodiversity duty

The local planning authority has a [duty](#) to conserve and enhance biodiversity as part of its decision making. Further information is available [here](#).

#### Designated nature conservation sites

Paragraphs 186-188 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites. Both the direct and indirect impacts of the development should be considered. A Habitats Regulations Assessment is needed where there is a likely significant effect on a habitats site and Natural England must be consulted on '[appropriate assessments](#)'. Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via [Impact Risk Zones](#) or as standard or bespoke consultation responses.

#### Protected Species

Natural England has produced [standing advice](#) to help planning authorities understand the impact of particular developments on protected species. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species [licence](#) may be required in certain cases.

#### Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 180, 181 and 185 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre,

### 3. Suffolk Constabulary

**SUFFOLK  
CONSTABULARY**



**OUR MISSION**  
KEEPING SUFFOLK SAFE



Otley Neighbourhood Plan v3.0  
(Consultation Draft)  
Response from Suffolk Constabulary

Andy Gallant  
Designing Out Crime Officer  
Suffolk Constabulary  
Lowestoft Police Station  
Old Nelson Street, Lowestoft  
Suffolk, NR32 1 EQ  
[Andrew.gallant@suffolk.police.uk](mailto:Andrew.gallant@suffolk.police.uk)  
[www.suffolk.police.uk](http://www.suffolk.police.uk)

Suffolk Constabulary is pleased to have the opportunity of commenting on the consultation draft of Otley Neighbourhood Plan.

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#### *Designing Out Crime Officers (DOCOs)*

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Designing Out Crime Officers (DOCOs) provide security and crime prevention advice in relation to the built environment, at every stage of the design process, in an attempt to minimise potential crime, disorder and anti-social behaviour in any proposed development.

They seek to work with planners and developers to provide advice on residential, school, hospital and commercial planning applications.

Suffolk Constabulary is supported by four DOCOs. Their duties encompass the former Architecture Liaison, Crime Prevention and Problem-Solving Officer roles.

Crime Prevention attempts to reduce and deter crime and criminals, enforce the law, and maintain criminal justice.

The following regulations and guidance are designed to ensure that Crime Prevention is maximised at the planning stage and thereafter.

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

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Crime and Disorder NPPF Policies that are applicable to developments are Para 91b and 127f.

#### **Paragraph 91b.**

Planning policies and decisions should aim to achieve healthy, inclusive, and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.



**Paragraph 127(f).**

Planning policies and decisions should ensure that developments create places that are safe, inclusive, and accessible, whilst promoting health and well-being, with a high standard of amenity for existing and future users, and where crime, disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

---

*Section 17 of the 'Crime and Disorder Act 1998' (CDA)*

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This part of the CDA places a duty on each local authority: 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can, to prevent crime and disorder in its area, to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'.

---

*SECURED BY DESIGN (SBD)*

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An early input at the design stage is often the best way to promote a partnership approach to reducing the opportunity for crime and the fear of crime. Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour, within developments, by introducing appropriate design features that enable natural surveillance and creates a sense of ownership and responsibility for every part of the development. These features include secure vehicle parking, adequate lighting of common areas, access control, defensible space and a landscaping and lighting scheme which enhances natural surveillance and safety.

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

Secured by Design principles are detailed in respective 'User Guides' for Housing, Commercial and School developments. I attach copies of each for your information.

In Suffolk, there is no mandate to implement SBD accreditation. However, it can be voluntarily adopted or imposed by the area planning office, as a condition of relevant permissions.

Building to the physical security of Secured by Design, which is the police approved minimum security standard, will reduce the potential for burglary by 50% - 75% and ensure compliance with Approved Document Q (ADQ - which applies to dwelling developments)

[Secured by Design - Building Regulations for Security.](#)



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### *Observations in respect of Otley Neighbourhood Plan*

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It is noted that there is no reference to Security or Crime Prevention, in the proposed Neighbourhood Plan.

In addition, there is no reference to Crime Prevention Through Environmental Design (CPTED) or Secured by Design (SBD) principles for new developments. The above have been proven to reduce crime, increase the likelihood of detecting criminal activity and improve public perceptions of safety.

Safe and secure developments help to provide an environment which promotes community spirit and reduces demand on partnership agencies and the police, on issues such as Anti-Social Behaviour, Domestic Violence, Misuse of Drugs and Burglary.

It may be that inclusion of such methodology falls outside the remit of a Neighbourhood Plan. However, Suffolk Constabulary endorse an early input into designing out crime at the concept and design stage, as the best way to promote a partnership approach to reducing crime and fear of crime.

Suffolk Constabulary recommend that the Otley Council considers including a recommendation that all planning applications be built to CPTED (Crime Prevention Through Environmental Design) principles and Secured by Design standards, in their Neighbourhood Plan.

Ideally, a planning condition for every application should be included, to that effect.

The following are some of the many aspects which should be considered in respect of any new development submitted for planning consent:

- **Local Ownership:** The quality of the urban environment has a major influence on crime, fear of crime and levels of anti-social behaviour. Good designs can enhance public perceptions of safety and promote a greater sense of 'local ownership' and community identity, by encouraging residents to feel pride in their neighbourhood.
- **Natural Surveillance:** Crime and anti-social behaviour can be deterred by ensuring that all parts of any development are subject of natural surveillance. There are many ways in which this can be achieved whilst maintaining privacy. Promoting active use of streets and public spaces is an effective means of restricting opportunities for crime.
- **Defensible space:** Public and private areas should be clearly defined to make people aware of where they are allowed to go. Crime and anti-social behaviour are more likely to occur if users are unclear whether space is public or private or unaware of the behaviour expected in each.
- **Access and Movement:** Good design and layout play a key role in tackling crime and social exclusion by creating better connected and more accessible environments without compromising security. Developments with too many under-used connections and large networks of indirect, poorly lit, and segregated pedestrian routes, providing access to the rear of buildings, can create opportunities for crime and easy escape routes for criminals. Conversely, layouts with too few connections to local amenities and public routes can restrict freedom of movement and create dead ends. A good 'movement framework' provides convenient, overlooked, and well-used principal routes that lead directly to where people want to go. This removes the need for underused alleyways, footpaths, shortcuts, and minor access points which are vulnerable to crime.

- **Parking:** Whether within the curtilage of a property or communal, parking can have a significant effect on the opportunity for crime. The main forms of criminal activity in car parks are theft of/from vehicles, and assault. Parking as part of new development should seek to create safe and convenient facilities where everyone can feel secure. A range of design measures can be used to create a safe and attractive environment with good natural surveillance.
- **Permeability:** The balance between permeability and accessibility is always a delicate one. From a policing perspective, excessive accessibility provides entry and escape routes for those committing crime. Suffolk Constabulary encourage designers to combine walkways/thoroughfares with lighting, surveillance, and security, to ensure that permeability is achieved, whilst enabling ready identification of those there for nefarious purpose.
- **Footpaths:** Public footpaths and cycleways should be overlooked by neighbouring properties, be straight and wide to maintain good visibility along their route, with recesses or gaps, between buildings, being closed off by a walls or railings. It is important to ensure that footpaths have a purpose and do not create 'rat runs' and/or areas which cannot be monitored.
- **Private and Communal Areas:** Providing adequate and well-maintained public spaces can make an important contribution to community safety and community well-being, by raising levels of activity in public areas and providing valuable local facilities for all age groups. Poorly planned spaces with limited surveillance can increase the risk of vandalism and assault. Such areas can also be used to gain access to properties. Public spaces should be fronted by dwellings and not backed onto by private rear boundaries or back gardens.

[Suffolk Constabulary](#) provide comprehensive crime prevention advice on home security, personal safety, road safety, watch schemes, business safety, boat safety, online safety, counter terrorism, child safety and personal security.

Further information on SBD can be found at [www.securedbydesign.com](http://www.securedbydesign.com)

Please feel free to contact me if you wish to discuss the recommendations above further.



Andy Gallant  
Designing Out Crime Officer,  
Eastern Area,  
Suffolk Constabulary  
23rd April 2024



## 4. Sport England

From: **Clare Howe** <[Clare.Howe@sportengland.org](mailto:Clare.Howe@sportengland.org)>  
Date: Fri, 8 Mar 2024 at 18:45  
Subject: RE: OTLEY NEIGHBOURHOOD PLAN - Sport England's Response  
To: Gavin Grant <[gavintgrant@gmail.com](mailto:gavintgrant@gmail.com)>

Dear Gavin,

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paragraphs 102 and 103. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

- Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

- Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Paragraph 102 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. <http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

- Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.*

Yours sincerely

**Clare Howe MRTPI MSc BA(Hons)**

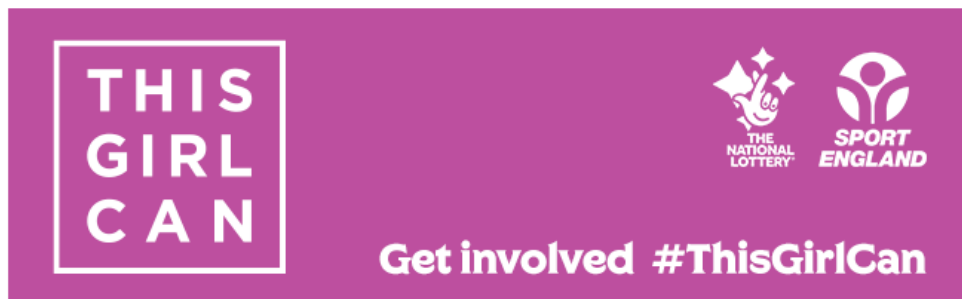
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We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

## 5. National Gas



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[avisonyoung.co.uk](http://avisonyoung.co.uk)

Our Ref: MV/ 15B901605

07 May 2024

Otley Neighbourhood Plan Team  
[gavintgrant@gmail.com](mailto:gavintgrant@gmail.com)  
via email only



Dear Sir / Madam  
**Otley Neighbourhood Plan Regulation 14 Consultation**  
**March – May 2024**  
**Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### **About National Gas Transmission**

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

### **Proposed sites crossed or in close proximity to National Gas Transmission assets**

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

### **Distribution Networks**

Information regarding the gas distribution network is available by contacting:  
[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

### **Further Advice**

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Matt Verlander, Director**

**Kam Liddar, Asset Protection Lead**



[nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

Avison Young  
Central Square  
Forth Street  
Newcastle upon Tyne  
NE1 3PJ

[kam.liddar@nationalgas.com](mailto:kam.liddar@nationalgas.com)

National Gas Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Matt Verlander MRTPI**  
**Director**  
**0191 269 0094**  
**[matt.verlander@avisonyoung.com](mailto:matt.verlander@avisonyoung.com)**  
**For and on behalf of Avison Young**

## 6. Suffolk Wildlife Trust

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From: **Alex Jessop** <[Alex.Jessop@suffolkwildlifetrust.org](mailto:Alex.Jessop@suffolkwildlifetrust.org)>  
Date: Thu, Mar 28, 2024 at 3:30 PM  
Subject: RE: Otley Neighbourhood Plan  
To: Gavin Grant <[otleynp@gmail.com](mailto:otleynp@gmail.com)>  
Cc: [issywizzy58@gmail.com](mailto:issywizzy58@gmail.com) <[issywizzy58@gmail.com](mailto:issywizzy58@gmail.com)>, Claire Gasson <[claire@gasson.org](mailto:claire@gasson.org)>, [angus.beattie@gmail.com](mailto:angus.beattie@gmail.com) <[angus.beattie@gmail.com](mailto:angus.beattie@gmail.com)>, [AndrewRGraham@btinternet.com](mailto:AndrewRGraham@btinternet.com) <[AndrewRGraham@btinternet.com](mailto:AndrewRGraham@btinternet.com)>, [Emma.Flint@otleyparishcouncil.org](mailto:Emma.Flint@otleyparishcouncil.org) <[Emma.Flint@otleyparishcouncil.org](mailto:Emma.Flint@otleyparishcouncil.org)>

Good afternoon Gavin,

Thank you for getting back to me,

It would be great to have some further discussion about how, in Suffolk Wildlife Trust opinion, ONHP1 could deliver more. While new Planning Policy Guidance is worded to say that new plans should not, without justification, include policy above the mandatory minimum 10% Biodiversity Net Gain, and we have recently been disappointed to see the Acton NP aspiration for net gain to deliver 20% be removed at the examination stage, we have seen the Maidstone Local Plan approved at external examination with a policy for 20% net gain. This was delivered by including justification that satisfied examination.

If Suffolk Wildlife Trust were to look at the justification used and look to adapt this to Suffolk and in particular Otley, would there be support to include an aspiration to deliver over 10% in Otley? I am happy to discuss the merits of this in more detail if that is useful,

I am also happy to discuss what Suffolk Wildlife Trust can offer in terms of more formal talks, and could look to link up with one of our conservation advisors with regard to the community orchard and gardening club in general – sounds like a great way to discuss helping wildlife in the parish!

Kind regards,  
Alex  
Alex Jessop [he/him]  
Planning & Advocacy Officer  
07721 120398





**Suffolk Wildlife Trust**

Brooke House  
Ashbocking  
Ipswich  
IP6 9JY

01473 890089

teamwilder@suffolk

wildlifetrust.org

suffolkwildlifetrust.org



Otley Parish Council

**By email only**

13<sup>th</sup> May 2024

Dear Otley Parish Council,

**RE: Otley Neighbourhood Plan Regulation 14 Consultation**

Thank you for sending us details of the Otley Neighbourhood Development Plan. We are pleased to see that the draft Plan recognises the importance of biodiversity and greenspaces and proposes measures to protect and enhance these within Plan Policies. We believe the plan could be strengthened to offer an even greater benefit to biodiversity. Please see our comments below:

Suffolk Wildlife Trust support OPC in seeking to promote planting of native species and natural boundaries in preference to hard boundaries, in order to promote wildlife conservation and diversity. However, we also highlight that habitat such as scrub and tussocky grassland has significant ecological value and can be achieved through a natural-regeneration approach which can reduce costs and provide a more natural habitat which is able to withstand the pressures of climate change.

**Policy ONHP 1: Ecology and Biodiversity**

Suffolk Wildlife Trust are happy to see the detailed definition of important ecological features within the parish which will have been clearly identified.

Section 4.2.10 shows that the people to Otley value nature and natural habitats within the parish, which provides rationale for development to go above and beyond.

In light of this, we also note the reference to measurable net gains, delivered as part of the Environment Act 2021<sup>1</sup>. The plan makes reference to the statutory minimum of 10%. Suffolk Wildlife Trust highlight that it is important to remember that DEFRA's own impact assessment<sup>2</sup> stated that, "In simple terms, [10%] is the lowest level of net gain that [DEFRA] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives."

Several local planning authorities across the country have proposed a higher than 10% minimum Biodiversity Net Gain requirement. In a review of adopted or draft policies, undertaken by Carter Jonas in 2023, from the 306 LPAs in England the majority of those requiring over 10% Biodiversity Net Gain lie in the south of England. The East of England has two LPAs with such policies<sup>3</sup>.

<sup>1</sup> <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/839610/net-gain-ia.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf)

<sup>3</sup> <https://www.carterjonas.co.uk/planning-and-development/article/biodiversity-net-gain-policies-local-plans>

Maidstone Borough Council recently included a requirement for a minimum 20% net gain in their emerging local plan<sup>4</sup>. The plan went to review after changes to Planning Practice Guidance (PPG)<sup>5</sup> where changes to the wording may suggest that delivering above 10% may be undesirable and requires justification. However, the inspector's report of the Maidstone Local Plan<sup>6</sup> noted that there was suitable evidence and justification provided. Suffolk Wildlife Trust therefore believe that, with suitable justification, Otley could put forward aspirations for net gain to deliver above the statutory minimum level of 10%. We provide what we believe as suitable evidence as an appendix to this letter.

The policy could further push for the inclusion of species-specific enhancements which are not part of the Biodiversity Net Gain assessment. These could include swift boxes, house sparrow terraces, and ensuring that where fences are installed (where hedgerows are unsuitable) that connectivity for hedgehogs is retained.

#### **Policy ONHP2: Landscape and Amenity**

Suffolk Wildlife Trust support point 'a' of this policy, which identifies the importance of trees, hedgerows, ponds, streams, and watercourses, which are examples of wildlife corridors and steppingstone habitat which can have significant biodiversity value. The wording could be updated to clarify that these are examples of wildlife corridors.

#### **Policy ONHP4: Local Green Space**

This policy suitably identifies greenspaces within the parish and highlights the importance of these area for biodiversity and offering people a chance to connect with the natural world.

Please do not hesitate to contact us should you require anything further.

Yours sincerely,

Alex Jessop  
Planning & Advocacy Officer

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<sup>4</sup> Maidstone Borough council, 2021, Local Plan review, Draft Plan for Submission (Reg.19), <https://drive.google.com/file/d/13MfNeKxSGxYlfCCKZcP6-ggua2EFInbt/view>

<sup>5</sup> <https://www.gov.uk/guidance/biodiversity-net-gain>

<sup>6</sup> Spencer, D., 2024, Report to Maidstone Borough Council, Report on the Examination of the Maidstone Local Plan Review, PINS/U2235/429/10, <https://drive.google.com/file/d/1BpJD7DyWVbciCOQQ2pLhEY5o3hWXo1Mb/view>

## Appendix: Evidence to support and justify aspiration for 20% BNG within Policy ONHP1

The inspector's report of the Maidstone Local Plan<sup>6</sup> Para.368 states;

- *"The policy sets a requirement for a minimum 20% BNG. Whilst the national BNG requirement is set at a minimum 10%, there is nothing in the NPPF 2021 or the Environment Act 2021 to suppress local authorities seeking more ambitious minimum targets through Local Plans provided it is justified. The environmental baseline in the SA [Sustainability Appraisal] confirms that Kent has not met its 2010 Biodiversity targets, and is unlikely to have met 2020 targets, and this is set to decline further without targeted interventions. In this regard I was referred to the collaborative approach being taken across Kent, including through the Kent Nature Partnership and from Kent Wildlife Trust<sup>7</sup> that is seeking a minimum 20% BNG in Local Plan policies. This would also align with widespread representations at earlier stages of Plan preparation for a stronger policy framework for biodiversity, as set out in the Environment Topic Paper."*
- (Para 369) *"At a more local level, seeking a 20% BNG would clearly align with the objectives and ambitions set out in the Council's Climate Change and Biodiversity Strategy and Action Plan<sup>8</sup>. This includes a number of actions for the Borough Council including implementing a Biodiversity Strategy and a Nature Recovery Strategy and working with others to deliver landscape scale biodiversity initiatives. The minimum 20%, measured against the latest metric, is strongly supported by Natural England and KCC, amongst others. SA has also taken account of 20% BNG, both as part of Policy LPRSP14(A) and in the strategic policies for Heathlands and Lidsing, which has informed an assessment that it can be anticipated to have positive effects in mitigating the effects of development."*

Suffolk Wildlife Trust therefore put forward the following rationale for delivering BNG above 10% in Suffolk:

- The 2023 State of Nature Report<sup>9</sup> highlights that, despite considerable conservation efforts over recent decades, many species continue to decline. This includes, of note to Suffolk:
  - The abundance of 753 terrestrial and freshwater species has on average fallen by 19% across the UK since 1970. Within this average figure, 290 species have declined in abundance (38%).
  - The UK distributions of 4,979 invertebrate species have on average decreased by 13% since 1970. Stronger declines were seen in some insect groups which provide key ecosystem functions such as pollination (average 18% decrease in species' distributions).
  - Since 1970, the distributions of 54% of flowering plant species and 59% of bryophytes (mosses and liverworts) have decreased across Great Britain.
  - 10,008 species were assessed using Red List criteria. 2% (151 species) are extinct in Great Britain and a further 16% (almost 1,500 species) are now threatened with extinction.
- The UK Government's 25-Year Environment Plan<sup>10</sup> includes the following targets, which are more likely to be met should BNG deliver levels above 10%:
  - Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition
  - Creating or restoring 500,000 hectares of wildlife-rich habitat outside of the protected sites network, focusing on priority habitats as part of a wider set of land management changes
  - Increasing woodland in England in line with our aspiration of 12% cover by 2060; this would involve planting 180,000 hectares by the end of 2042.
- The UK Government has committed to delivering "30by30" on Land in England<sup>11</sup>:

<sup>7</sup> <https://www.kentwildlifetrust.org.uk/blog/what-is-biodiversity-net-gain>

<sup>8</sup> <https://www.kent.gov.uk/environment-waste-and-planning/climate-change/climate-emergency-statement>

<sup>9</sup> [https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report\\_2023\\_FULL-DOC-v12.pdf](https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf)

<sup>10</sup> <https://assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf>

<sup>11</sup> [https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering\\_30by30\\_on\\_land\\_in\\_England.pdf](https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf)



- In 2020, the government committed to protecting 30% of the UK's land by 2030 (30by30). Thanks to UK leadership, a global 30by30 target was adopted at the UN Biodiversity Summit COP15 in December 2022, as part of an ambitious Global Biodiversity Framework.
- In October 2023, Wildlife and Countryside Link published the 30by30 in England 2023 Progress Report<sup>12</sup>. This found:
  - The area of England effectively protected for nature is still hovering around 3.11% on land and at maximum 8% at sea.
  - The UK is one of the most nature-depleted countries in the world, sitting in the bottom 10% globally for biodiversity remaining.
- At a minimum, the UK has failed to meet 14 of the 19 Aichi biodiversity targets, the global nature goals the UK committed to meet by 2020<sup>13</sup>, which were put forward as part of a "2020 Vision"<sup>14</sup>.
- West Suffolk Council have declared a climate and environment emergency<sup>15</sup> and following the introduction of the Environment Act 2021, West Suffolk Council as a public authority must consider how to conserve and enhance biodiversity in the area. This 'biodiversity duty' requires West Suffolk Council to "*consider what we [WSC] can do to conserve and enhance biodiversity.*"
- East Suffolk Council have, alongside declaration of a climate emergency in 2019, now declared a biodiversity emergency<sup>16</sup>.
- Suffolk County Council have declared a climate emergency<sup>17</sup> and will continue to change approaches to progress to net zero, and work to encourage others' behavior changes. Both are needed to protect and enhance Suffolk's environment and biodiversity.
  - We will fulfil this ambition by:
  - Promoting biodiversity and conserving natural habitats and open spaces.
- Babergh Mid-Suffolk District Council declared a climate and biodiversity emergency in 2019<sup>18</sup> and in September 2019, councilors approved commitments to enhance and protect biodiversity across our district.

<sup>12</sup> [https://wcl.org.uk/assets/uploads/img/files/WCL\\_2023\\_Progress\\_Report\\_on\\_30x30\\_in\\_England\\_1.pdf](https://wcl.org.uk/assets/uploads/img/files/WCL_2023_Progress_Report_on_30x30_in_England_1.pdf)

<sup>13</sup> <https://publications.parliament.uk/pa/cm5802/cmselect/cmenvaud/136/136-summary.html>

<sup>14</sup> <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

<sup>15</sup> <https://www.westsuffolk.gov.uk/environment/climate-change/index.cfm>

<sup>16</sup> <https://www.bbc.co.uk/news/uk-england-suffolk-68370018>

<sup>17</sup> <https://www.suffolk.gov.uk/council-and-democracy/our-aims-and-transformation-programmes/our-ambitions-for-suffolk/protecting-and-enhancing-our-environment>

<sup>18</sup> <https://www.babergh.gov.uk/documents/d/mid-suffolk/climate-change-and-biodiversity-annual-report-mid-suffolk>

## 7. National Highways



Our ref: NH/24/05407 – Otley N'hood Plan  
Your ref: Otley Neighbourhood Plan

To Whom It May Concern

Or  
Gavin Grant  
Chair of Otley Neighbourhood Plan Team

Shamsul Hoque  
National Highways  
Spatial Planning  
Operations (East)  
Woodlands  
Manton Lane  
Bedford MK41 7LW

08 March 2024

Via email to: [gavintgrant@gmail.com](mailto:gavintgrant@gmail.com)

Dear Sir/Madam,

**OTLEY NEIGHBOURHOOD PLAN  
PRE- SUBMISSION CONSULTATION DRAFT**

Thank you for your correspondence, received on 04 March 2024, for inviting National Highways' comments on the above.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding of the Neighbourhood Plan, we have responsibility for the trunk roads A12 and A14.

The area and location that are covered by this current consultation, Neighbourhood Plan Pre-Submission Draft Plan, is remote from the SRN. Consequently, for the proposed draft Neighbourhood Plan, it is unlikely to have an impact on the operation of the trunk road.

Therefore, National Highways offers No Comment.

Please contact us at [PlanningEE@nationalhighways.co.uk](mailto:PlanningEE@nationalhighways.co.uk) if you require any clarification.

Yours Faithfully,

S. H.  
Shamsul Hoque  
Assistant Spatial Planner

## 8. Environment Agency



To Whom It May Concern:  
Otley Neighbourhood Plan  
Otley Village Hall Chapel Road  
Otley  
IP6 9NT

**Our ref:** AC/2024/132081/01-L01  
**Your ref:** OtleyNHP  
**Date:** 09 April 2024

Dear Sir/Madam

### **REGULATION 14 OTLEY NEIGHBOURHOOD PLAN**

#### **OTLEY**

Thank you for consulting us on the Draft Neighbourhood Plan for Otley.

We regret that at present, we are unable to review this consultation. We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest.

For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

We note the East Suffolk Local Plan was recently adopted in 2019, and that there are not any important environmental constraints, within our matrix for currently screening neighbourhood plans, that affect this Neighbourhood Plan Area. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local planning authority area.


We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

[How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning.](#)

The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and

Environment Agency  
Iceni House Cobham Road, Ipswich, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)


Cont/d..



actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites and sustainable drainage measures can complement other objectives such as enhancing green spaces.

We trust that this advice is useful.

Yours sincerely



**Miss Lucy Fielder**  
**Sustainable Places - Planning Advisor**

Team e-mail [Planning.eastanglia@environment-agency.gov.uk](mailto:Planning.eastanglia@environment-agency.gov.uk)  
Team number 02084 745242