

# Sutton St Nicholas NDP Review: Response log

## Abbreviations

AA: Appropriate Assessment (April 2022)

CA: Community Action

HC: Herefordshire Council

LVIA: Landscape and Visual Impact Assessment

LPCS: Herefordshire Local Plan Core Strategy (adopted 16 October 2015)

NPPF: National Planning Policy Framework (2021)

NDP: Neighbourhood Development Plan

NPPG: National Planning Practice Guidance

PROW: Public right of way

SAC: River Wye Special Area of Conservation

SoM: Statement of Modifications

SEA: Strategic Environmental Assessment (April 2022)

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## Part 1: Comments from consultation bodies

Consultee	NDP Review ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Sutton St Nicholas NDP Review
Avison Young for National Grid	NDP	C	<p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) 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. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></li> </ul> <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks</p> <p>Information regarding the electricity distribution network is available at the website below:</p> <p><a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p>Information regarding the gas distribution network is available by contacting:</p> <p><a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p> <p>Further Advice</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.</p>	Comment noted.	No change.
Coal Authority			Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.	Comment noted.	No change.

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Dwr Cymru Welsh Water	NDP and objectives	S	I refer to the below and would like to thank you for consulting Welsh Water. We welcome and support the proposed modifications to the Plan. Specifically with regard to the Objectives, we welcome the addition of the objective on the River Wye Special Area of Conservation.	Comment noted.	No change.
	Policies SUT2 and SUT3	S	We note that there are number of new and replacement policies proposed, and we note and welcome the continued inclusion of the accompanying text to policies SUT2 and SUT3 with regard to the provision of Welsh Water infrastructure.	Comment noted.	No change.
	Policy SUT11	S	We also welcome the inclusion of Policy SUT11 Water quality in the River Lugg – the first element of this policy will be key to ensuring the water quality issue is addressed, whilst the capacity of the WwTW and the public sewerage network is a requirement in order for development to be forthcoming. If you require any further detail on the above, please let me know.	Comment noted.	No change.
Environment Agency	NDP	C	We have reviewed the submitted document and would like to make the following comments at this time. As part of the adopted Herefordshire Council Core Strategy updates were made to both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Strategy (WCS). This evidence base ensured that the proposed development in Hereford City, and other strategic sites (Market Towns), was viable and achievable. The updated evidence base did not extend to Rural Parishes at the NDP level so it is important that these subsequent plans offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period. Herefordshire Council are shortly to begin the Local Plan review process including updates to the evidence base.	Comment noted.	No change.
	Policies SUT2 and SUT3		Flood Risk: We note that there are two submitted sites within the proposed plan; Land at the Lane (Policy SUT2) and Land adjacent to the Linnings (SUT3). Land adjacent to the Linnings is entirely within Flood Zone 1, the low risk Zone. Land at the Lane is predominantly within Flood Zone 1 but the southern extent of the site is shown to fall within Flood Zone 3, the high risk zone. It is noted that the land that lies within Flood Zone 3 is to be 'kept free from development'. As part of any detailed proposals for this site we would expect	As this comment notes, the southern part of land at The Lane is already identified as to be kept free from development. To clarify the planning requirements, an additional criterion is added to policy SUT2. A Flood Risk	Add new criterion 5 to policy SUT2: "all development is located within Flood Zone 1 in accordance with a Flood Risk Assessment which should accompany any planning application for the development of the site;"

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			all development to be located within Flood Zone 1. Should this allocation be maintained within the NDP it should be noted that a Flood Risk Assessment (FRA) would need to accompany any forthcoming planning application to confirm the above. It should be noted that our Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Herefordshire Council as the Lead Local Flooding Authority (LLFA).	Assessment has already been submitted as part of planning application P193293/F for the development of the site.	
	Policy SUT11	C	<p>River Wye SAC Catchment: It is noted that Sutton St Nicholas falls within the River Lugg Sub-Catchment and that an Appropriate Assessment (AA) has been undertaken in light of recent comments from Natural England (NE). As confirmed within the AA document, and the Draft Plan, the most significant issue within the River Wye SAC Catchment (included the River Lugg) relates to water quality and the potential impact of policies and site allocations within the NDP's.</p> <p>We have previously provided comment on similar NDPs' with a view to ensuring a robust submission and that development can be achieved without impact on the integrity of the SAC, primarily within the Lugg Catchment. Herefordshire Council are seeking to progress mitigation measures, including integrated wetlands, to assist in the reduction of phosphate levels and with a view to resolving water quality issues within the County, specifically the Lugg Sub-catchment. Further evidence is being drafted by the Council, in consultation with NE, to give greater certainty that the mitigation proposed will enable development to proceed without an impact on the SAC.</p> <p>It is noted, and welcomed, that the NDP includes a specific Policy section on Water Quality in the River Lugg and that the Policy SUT11 (Water Quality in the Lugg) now makes specific reference to impacts on the Catchment, including the need for nutrient neutrality and mitigation measures to secure such. The Phosphate Budget Calculator Tool, and associated guidance, is also referenced in the Policy.</p> <p>In consideration of the above Herefordshire Council should be satisfied, in consultation with NE, as the primary consultation body on this matter, that this approach, including possible mitigation, is a viable and deliverable and that there is a reasonable degree of certainty provided to take forward the sites in the plan.</p>	Comment noted.	No change.

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Herefordshire and Gloucestershire Canal Trust	Policy SUT15	C	Thank you for the opportunity to reply to your Regulation 14 of the NDP. Thank you for highlighting the Canal within the document and having it as part of the policy SUT14. It would be good to see further comment about the enhanced benefits to the green space that the canal can bring such as a new walking routes when restored. A cycle route also along the towpath and enhance wildlife as already seen at locations that the canal has been cleared bring further bird life such as herons and kingfishers to the area. It is also not clear from the statements within the document if you support as a parish the restoration of the canal?	This support for the NDP is welcomed. The benefits of a restored Canal in terms of green infrastructure are acknowledged and should be referenced within the NDP. The Parish Council does support Canal restoration and this is also made clear in the amendment.	Add to bullet point 3 in para. 5.12:  “The Parish Council supports the restoration of the Canal and recognises the benefits to green infrastructure this would bring through the creation of walking and cycling routes and for wildlife.”.
Herefordshire Campaign to Protect Rural England	Objectives	S	Herefordshire CPRE strongly supports the more specific wording of the objectives and we particularly support: <ul style="list-style-type: none"> <li>the emphasis on protection of the River Wye,</li> <li>the inclusion of an objective re managing large scale agriculture and forestry</li> <li>the inclusion of key views and heritage assets and the guidance to build the type size and tenure of houses needed.</li> </ul>	This support for the NDP is welcomed.	No change.
	Made NDP policy 4	C	Why has the reference to re-use of existing buildings (proposal 1) been removed – the existing proposal sets out a sustainable approach to development in the countryside which would make good use of existing resources and limit the impact of development on the landscape.	The SoM explains that made policy 4 has been expanded to include further guidance on appropriate forms of economic development in Review policy SUT6. The provision referred to in the comment has not been removed from the NDP and is now to be found in bullet point 2 to policy SUT6.	No change.
	Policy SUT7	S		This support for these policies is welcomed.	No change.
	Policy SUT10	S			
	Policy SUT11	S			
	Policy SUT13	S			
	Policy SUT16	S			
	Policy SUT17	S/C	Consider: <ul style="list-style-type: none"> <li>Adding reference to protection of archaeology and necessity for development proposals to include full archaeological investigations.</li> </ul>	These suggestions are agreed.	Add new criterion 4 to policy SUT17:

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			<ul style="list-style-type: none"> <li>Requiring where appropriate, Heritage Impact Assessments should be undertaken to inform development proposals.</li> </ul>		“requiring development proposals to be accompanied by Heritage Impact Assessments where the significance of heritage assets may be affected. Where proposals may affect archaeological interests, an appropriate desk-based assessment and where necessary a field evaluation should be provided;”.
	NDP	C	The modifications have brought great clarity and detail to the plan, we believe this will help guide development effectively and help to protect Sutton Nicholas’ assets, environment and landscape. We particularly welcome the new policies SUT7 – 17 inclusive which give greater protection to the rural landscape and the environment as well as the townscape.	This support for the NDP is welcomed.	No change.
HC Neighbourhood Planning			<p>Welcome the addition of a policy index at the front of the plan, this aids Development Managements to reference policies.</p> <p>Para 3.2/ Table 1 – April 2022 figures show there are still 53 built with 3 commitments.</p> <p>Please to see the inclusion of Policy SUT11 and the details within the reasoned justification text.</p> <p>[NB No comments received from HC Development Management, Transportation and Highways, Environmental Health (noise/air), Strategic Housing, Landscape/archaeology/conservation, Economic Development, Education, Property Service, Parks and Countryside, and Waste.]</p>	Noting no change to the completion and commitment figures in Table 1, this can be updated to April 2022.	Update Table 1 to be based at April 2022 (not April 2021).
HC Strategic Policy	NDP	C	Core Strategy Conformity Assessment.	Comment noted.	No change.

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			Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments		
			SUT1: Sutton St Nicholas settlement boundary	RA2: Housing in settlements outside Hereford and the market towns	Y			
			SUT2: Land at The Lane	H1: Affordable housing SD1: Sustainable design and energy efficiency LD4: Historic environment and heritage assets	Y			
			SUT3: Land adjacent to The Linnings	H1: Affordable housing SD1: Sustainable design and energy efficiency LD1: Landscape and townscape	Y			
			SUT4: Housing mix	H3: Ensuring a range and mix of housing types	Y			
			SUT5: Householder development	SD1: Sustainable design and energy efficiency	Y			
			SUT6: Small-scale employment	E3: Homeworking RA4: Agricultural, forestry and rural enterprise dwellings RA5: Re-use of rural buildings	Y			

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			SUT7: Agricultural and forestry development	RA4: Agricultural, forestry and rural enterprise dwellings	Y			
			SUT8: Communications infrastructure	N/A	Y			
			SUT9: Community facilities	SC1: Social and community facilities	Y			
			SUT10: Renewable and low carbon energy	SD2: Renewable and low carbon energy	Y			
			SUT11: Water quality in the River Lugg	SD4: Wastewater treatment and water quality	Y			
			SUT12: Landscape character	LD1: Landscape and townscape	Y			
			SUT13: Key views	N/A	Y			
			SUT14: Local Green Space and public open space	OS1: Requirement for open space, sport and recreation facilities OS2 Meeting open space, sports and recreation needs	Y			



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			SUT15: Green infra-structure	LD3: Green infrastructure	Y			
			SUT16: Building design	SS6: Environmental quality and local distinctiveness SD1: Sustainable design and energy efficiency	Y			
			SUT17: Heritage	LD4 Historic environment and heritage assets	Y			
Environmental Health (Environmental Protection – contaminated land)	Policy SUT2	C	Land at the Lane: historically used as orchards, may have been subject to agricultural spraying.				This possibility is already included at para. 3.12.	No change.
	Policy SUT3	C	Land adjacent to the Linnings: historically used as orchards, may have been subject to agricultural spraying.				This possibility is already included at para. 3.16.	No change.
Historic England	NDP	C	Thank you for the invitation to comment on the reviewed Neighbourhood Plan. Historic England remains supportive of both the content of the document and the vision and objectives set out in it and has no adverse comments to make on the changes proposed. We do, however, welcome the inclusion of a new policy (SUT17) covering the conservation of the historic environment and heritage assets. Beyond those observations we have no further comments to make on what Historic England considers is a good example of community led planning that takes a suitably proportionate approach to the historic environment of the Parish.				This continued support for the NDP and for the inclusion of policy SUT17 is welcomed.	No change.
Sport England	NDP	C	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				Comment noted.	No change.

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			<p>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.</p> <p>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 Pars 98 and 99. 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. <a href="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</a></p> <p>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. <a href="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</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 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, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>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</p>		

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			<p>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.  <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>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.  <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p>		

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			Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a> (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.)		

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### Part 2: Community and other comments

Consultee	NDP Review ref	Type C = Comment O = Object S = Support	Comment received	Response	Amendments to draft Sutton St Nicholas NDP Review
Resident 1	NDP	C	Having only moved to Sutton St. Nicholas in August 2021, I applaud the Neighbourhood development Plan but would like to make a few general observations to date.	This support for the NDP is welcomed.	No change.
	Community Action CA1	C	The amount, size and speed of traffic passing through the Village is a major concern and with the proposed increase in housing this will only increase.	This is being addressed though the Traffic Plan referred to in CA1.	No change.
	Housing requirement and delivery	C	It is fantastic to see old properties being renovated but is there a need to build on land just for the sake of it because it is available, especially as the government have now announced the scrapping of new build targets?	NDP housing proposals have been developed to meet LPCS requirements.	No change.
		C	Should there be a reduction of planning granted on infill sites, given the current effects of climate change and environmental concerns.	LPCS policy RA2 provides for sustainable housing growth to be permitted in settlements such as Sutton St. Nicholas where planning criteria are met, including those set out in made and Review NDP policies.	No change.
	Community Action CA10	C	The play /park facilities for the village children seems a little underwhelming, could provision for a better green space not be found?	This is the subject of the Community Action listed at CA10.	No change.
	Community Action CA9	C	I note the mention of a local shop in the report, could this not be a community run venture and supported by the Parish council initially as has been done in other parts of the county?	This is the subject of the Community Action listed at CA9.	No change.
	NDP	C	As I have previously stated I applaud the Neighbourhood Development plan and its aim to keep Sutton St. Nicholas a thriving community rather than an extension of the Hereford City boundary.	This support for the NDP is welcomed.	No change.

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			My observations are as many may say those of a "Blow in" but they are fresh and made with the best intention.		
Resident 2	Para. 3.19	C	Herefordshire Council's policy "increased requirement for new housing to cater for older people": do we take account of our facility at Woodville which I understand is underutilised.	Woodville is part of the existing housing stock whereas LPCS policy H3 (to which policy SUT4 provides local detail) is concerned with the provision of new, additional dwellings.	No change.
	Community Actions	S	Very welcome additions.	This support is welcomed.	No change.
Resident 3	NDP	C	Services in the village have depleted since the last review eg bus service has reduced.	This is recognised by the inclusion of Community Action CA5.	No change.
	Policies SUT2 and SUT3	C	Developments agreed in the last NDP have not been fulfilled.	Land allocations in the made NDP have been carried forward into the Review. Both are the subject of undetermined planning applications.	No change.
	Community Action CA1	C	Despite many voluntary hours committed by villagers traffic volume and speed has increased, which is detrimental to our quality of life.	This is being addressed though the Traffic Plan referred to in CA1.	No change.
Residents 4 and 5	Policy SUT13	O	<p>Thank you for your invitation to consult on the above. This letter is written to convey our views and concerns and requests answers to a number of questions that the draft NDP review has raised - some general and others more specific. Please note that we understand and support the need for an effective NDP.</p> <p>Whilst this revision of the NDP is generally welcome and updates the original plan, there is one specific aspect that we cannot support and that is the inclusion of the proposed Policy SUT13 - Key Views. We note that in the Statement of Modifications, page 22, that this policy is dismissed as 'another topic' in relation to changing the nature of the plan.</p>	The addition of policy SUT13 does not change the nature of the plan. This is because the made NDP already recognises that the contribution made by important views of the open countryside around the village is part and parcel of the protection to be afforded to its landscape setting (objective for open spaces	No change.

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			<p>'The new policies on the other topics are relatively detailed, specific and limited in their application and as such do not change the nature of the plan.' We disagree with this. The inclusion of this policy, in our opinion, does appear to fundamentally change the nature of the plan and has potentially significant legal and financial implications for each respective landowner impacted by it should they wish to undertake future development. We recognise that the household survey did indicate that a substantial proportion of respondents would like to 'protect important views and landscape settings.' There was however no indication of which views and landscape settings respondents saw as important. The eight 'Key Views' proposed appear to apply to areas of private land, several of which would potentially afford the opportunity for housing and/or other development either pre or post 2031.</p> <ul style="list-style-type: none"> <li>Is the development and adoption of this policy designed to deliberately obstruct potential and future development of the land covered by these Key Views?</li> </ul> <p>It is further noted that no views to or from the north and northwest of the village have been identified as Key Views despite there being a significant number of other views of the village available from the existing parish rights of way and public highways in that area.</p> <ul style="list-style-type: none"> <li>Why are views from the Ordis Bridleway towards the village setting not included?</li> </ul> <p>Key View (KV) 2 is the specific view that impacts on land owned by us. (The photo appears to relate solely to our field!). Should SUT 13 be adopted it would impact directly on any future development through the imposition of the proposed conditions and restrictions. To help to determine the financial and legal limitations and implications that Policy SUT 13, if adopted, will have on any potential future development of our land please answer the following:</p> <ul style="list-style-type: none"> <li>What criteria were used in determining the location of the Key Views and specifically that relating to KV2?</li> <li>How are the Parish Council defining 'protection' in this context?</li> </ul> <p>The proposed policy also states:</p> <p>'Where a development proposal within the Neighbourhood Area lies within sight of one of the above Key Views, a Landscape and Visual Impact Assessment, or similar study should be provided to demonstrate that the</p>	<p>and the environment; made policy 6 and para. 6.7). New policy SUT13 seeks to further specify that contribution by identifying specific views and so providing greater clarity to decision makers. This is analogous to the example given in NPPG that "if the original plan primarily shapes growth through measures such as design policies, then modifications seeking to take forward these policies through design codes would be unlikely to change the nature of the plan" (Paragraph: 086 Reference ID: 41-086-20190509). Policy SUT13 is not 'designed to deliberately obstruct development', but rather seeks to appropriately protect and enhance the contribution made by the identified key views to the landscape setting of the village. It responds to the household survey where 82% of respondents wanted to see important views and the landscape setting of the village protected (Q15) and provides clarity as to how development proposals affecting the identified views will be assessed. Views to the north-west of the village/Sutton Walls including the bridleway referred to are to be</p>	

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				keep under review the need for the NDP to be updated. Policies in the NDP may be superseded by other development plan policies, such as those arising from the current review of the Local Plan/LPCS, changes to national policy, or the emergence of new evidence. Where policies in the NDP become out-of-date or new policies are found to be required, the Parish Council will decide how best to update the plan.	
Resident 6	Policies SUT7 and SUT10	C	Utmost concern given Government 2022 greenlight to increased industrial farming and polytunnels, regarding the 24/7 volume and size of HGV from/to Marden. Can this be monitored? How might this be monitored?	Development proposals will need to provide a Transport Assessment (or Statement) in demonstrating compliance with these policies, as referenced in para. 4.5.	No change.
	Policy SUT7	C	<p>Surface run-off on road between St. Michaels and Freens Court after heavy rain is caused by up and down hill ploughing. Similar run-off between Ordis Farm and The White House also impacts on highway.</p> <ul style="list-style-type: none"> <li>Concern must be for soil erosion and phosphate contamination of waterways, as well as evident damage to highways.</li> <li>Given future development of farming towards greater industrialised production and its impact on current road infrastructure – how can this be assessed and sustainably addressed?</li> </ul>	This is not a planning matter.	No change.
	Policy SUT14	S	To be supported. Furthermore to maintain the character of LGS1 – what further support might be made available, e.g. towards replanting or maintenance as an orchard. Might public access be possible?	This support for the policy is welcomed. Maintenance of privately-owned Local Green Space remains a matter for the land owners. Designation does not in itself confer any rights of	No change.

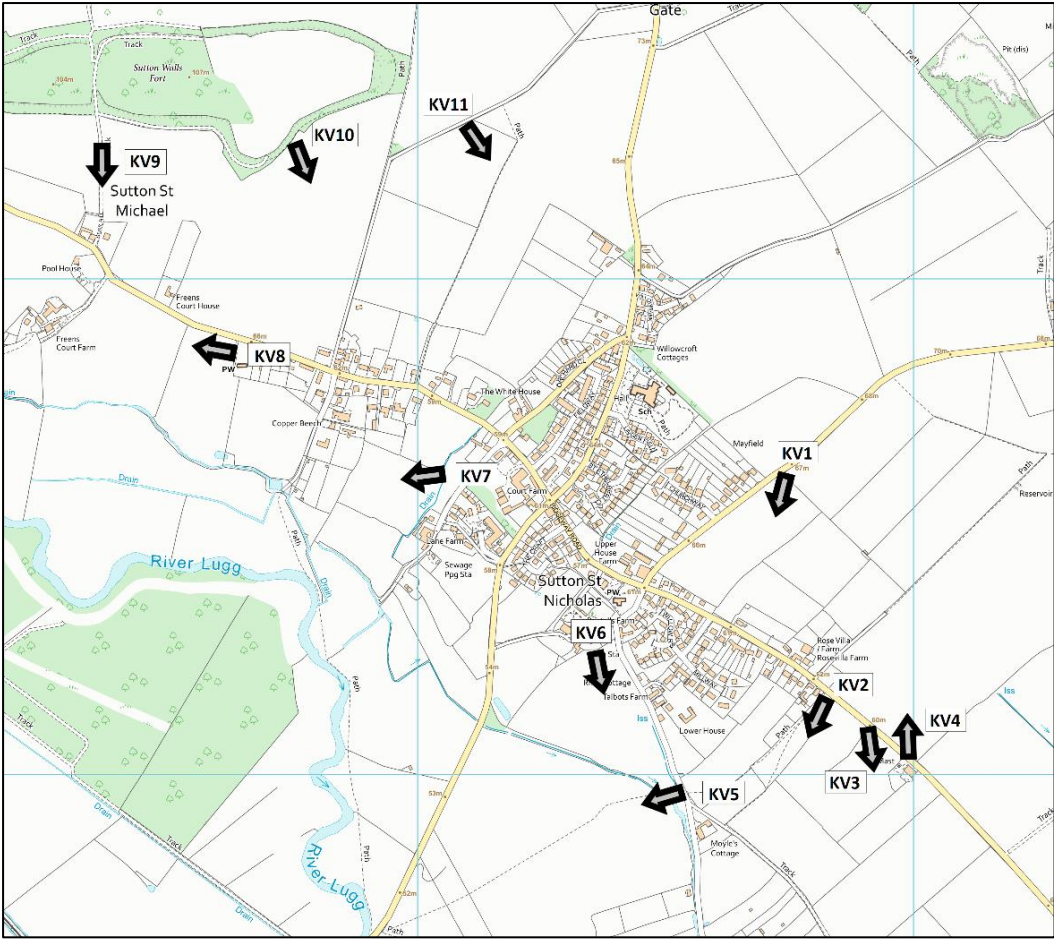
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				public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.	
	NDP	C	Given cost of living crisis and increasing number of houses without gardens – has any thought been given to setting aside space for allotments.	For Steering Group discussion	
	Policy SUT13	S	<p>Supporting and need to include more crucial key views of village within CP neighbourhood. To add:</p> <ul style="list-style-type: none"> <li>• View from public footpath at east end of Sutton Walls hill fort looking east towards village, including Thinghill, Malverns and Breckonbury.</li> <li>• View of village from permitted footpath on spur of southern aspect of Sutton Walls.</li> <li>• View down Busy Lane over Freens Court and archaeological sites and Lugg Meadows.</li> </ul> <p>Key views are crucial to determining the character of the area and the curtilage of development contained within village. These views must be protected.</p>	<p>The suggested views to the north-west of the village will complement those already included in policy SUT13. The view from the east end of Sutton Walls offers only glimpsed views of the village due to intervening vegetation; an alternative is proposed from a bridleway further to the east. This view, KV11, includes land allocated for development by policy SUT3. This development will not harm KV11 as it will appear against the backdrop of the existing village. In addition, KV11 will more generally serve to protect the landscape setting of the village on its north-westerly flank. Taking this into account, the inclusion of KV11 in policy SUT13 is justified.</p>	<p>Add to policy SUT13 and include in para 5.6 (with grid references):</p> <p>“KV9: the view from Sutton St. Nicholas public footpath 1 Busy Hill looking south over the Lugg Valley. KV10: the view from Sutton St. Nicholas public footpath 2 on Sutton Walls looking south-east towards the village. KV11: the view from Marden bridleway 29 east of Sutton Walls looking south-east towards the village.”.</p> <p>Include viewpoints on Plan 5.</p> <p>See plan and view images at end of response log.</p>
	Policy SUT17	C	Inclusion of English Heritage guidelines regarding ploughing and agricultural development adjacent Ancient Scheduled Monuments into plan.	Historic England’s 2014 guide for owners and occupiers of Scheduled Monuments refers to	Add footnote to first bullet para 5.17:

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				these matters and encourages farmers to consider ways of minimising the risk to scheduled monuments under cultivation. It could usefully be referenced in para. 5.17.	“Historic England’s guide for owners and occupiers of Scheduled Monuments aims to reduce the risk to scheduled monuments under cultivation. Ploughing gradually erodes earthworks and breaks up undisturbed archaeological remains: see <a href="https://historicengland.org.uk/images-books/publications/scheduled-monuments-guide-for-owners-and-occupiers/guideforownersofschedulemonuments/">https://historicengland.org.uk/images-books/publications/scheduled-monuments-guide-for-owners-and-occupiers/guideforownersofschedulemonuments/</a> .”
	NDP	C	What more can be included in the plan to protect and support biodiversity of Sutton Walls?	This is primarily a matter for land owners and managers unless development is proposed. Policy SUI15 explains how green infrastructure will be enhanced when opportunities associated with development proposals arise. Sutton Walls is in part a Habitat of Principal Importance (deciduous woodland) so it could be referenced within the supporting text to this policy.	Add deciduous woodland at Sutton Walls to the list at the first bullet point of para. 5.12.

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Policy SUT 13: additional key views KV9, KV10 and KV11



KV9: south from Busy Hill



KV10: south-east from Sutton Walls



KV11: south-east from bridleyway 29