

Cranbrook and Sissinghurst Parish Neighbourhood Development Plan

Examiner's Clarification Note

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification.

For the avoidance of any doubt matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a clear vision for the neighbourhood area. It addresses a range of issues which relate closely to its character and appearance. The presentation and layout of the Plan is very good. The Plan is supported by excellent photographs and maps.

Chapters 1 and 2 provide a very clear framework for the detailed policies in the Plan. The relationship between the vision and objectives and the resulting policies is very impressive.

Points for Clarification and observations

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise issues for clarification with the Parish Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications to the Plan to ensure that it meets the basic conditions. I set out specific clarification points and observations for the Parish Council below in the order in which the policies concerned appear in the submitted Plan.

General – Policy Format

The policies are generally clear and separated from the supporting text. Nevertheless, I am minded to recommend that they are displayed in policy boxes.

Does the Parish Council have any comments on this proposition?

General – Maps

I have seen the detailed maps in the submission package and the way in which they support certain policies.

In basic conditions terms the Plan will need to include at least a map of the neighbourhood area. It would be helpful if the Parish Council expanded on the way in which it considered this matter and how it anticipates that the maps would feature (if at all) in the final version of the Plan.

General- Number of policies

Several of the representations comment about the number of policies in the Plan. On the one hand the comprehensive nature of the Plan is a very positive feature and demonstrates the level of work which has been undertaken. On the other hand, neighbourhood plans do not need to repeat national or local policies.

Does the Parish Council have comments on the representations which address this matter?

On what basis did the Parish Council set out to prepare the Plan to bring distinctive added value to national and local planning policies?

General – Proportionality and wording of policies

Several policies would apply to all development proposals. Plainly a range of proposals will come forward within the Plan period. However, the majority will be small-scale and/or domestic in nature.

On this basis, I am minded to recommend modifications to the policies concerned so that they would apply in a proportionate way (based on their scale, nature, and location). Does the Parish Council have any comments on this proposition?

General – Relationship of the submitted Plan to the development plan

The basic conditions test for a neighbourhood plan is against the strategic policies in the adopted Local Plan. Several policies in the Plan have sought to add value to policies in the emerging Local Plan. As the Parish Council will be aware the Planning Inspector has now issued his preliminary findings on the Local Plan.

Does the Parish Council have any comments on the preliminary findings and their potential implications on the content of the neighbourhood plan?

Policy LN3.5

This policy has attracted several representations.

The Borough Council contends that the policy does not take account of existing and consented development and does not conform with the strategic policy for Cranbrook and Sissinghurst in the submitted Local Plan, its allocations, or indeed those in the adopted Site Allocations DPD. It recommends that the policy is revised so that it relates to the promotion of natural flood management of the Crane Brook and to support nature recovery measures as part of developments in the Crane Valley. It also suggests that the buffer zones are deleted.

Plainly this matter overlaps with the general questions raised in this note. Nevertheless, on what basis has the Parish Council pursued this policy?

Policy LN3.8

The purpose of the policy is clear.

Did the Parish Council consider identifying the Green Gaps on a map base?

Policy LN3.11

I looked carefully at the various proposed local green spaces (LGS) during the visit. The details about the various LGSs are well-considered.

In general terms did the Parish Council consider the additional benefit that would be achieved for the proposed LGSs which are within the High Weald AONB (see Planning Practice Guidance ID37: 011-20140306)?

What is the size of LGS7?

How does the proposed designation of LGS9 relate to Policy LN3.5?

Please can the Parish Council comment on the representation from Mr Mellor on the proposed designation of LGS14.

Policy H4.4

Several of the representation from the development industry comment about the evidence for some of the identified views.

Please can the Parish Council expand on the way in which it prepared the policy?

To what extent would the policy add value to existing national and local policies in relation to the High Weald AONB?

Does the Parish Council have any comments on the specific views raised by the development industry in the representations?

Policy H4.10

This is a good policy. The associated design guide is a first-class document.

Policy HO7.1

Would this policy bring any added value to national and local (adopted and emerging) policies on affordable housing?

Policies CC8.3 and 8.4

In general terms these policies are well-considered. They will contribute to the delivery of the social dimension of sustainable development.

In both cases should criterion b be supporting text rather than policy?

In both cases how would the developer contributions referenced in criterion d be achieved?

Project List

The identified projects are commendably distinctive to the Parish. They will complement the land use policies and the wider approach in the Plan.

Matters for clarification/updates from the Borough Council

Please can I have an indicative timetable for the Borough Council's response to the Inspector's preliminary findings on the emerging Local Plan and the next stages in the plan-preparation process

Please can I have updates on the following planning applications:

- 20/00815/FUL (in relation to AL/CRS3 in the emerging Local Plan and Policy LN3.5 of the submitted neighbourhood plan); and
- 21/03914 (in relation to Policy CC8.5).

Representations

Does the Parish Council wish to comment on any of the representations made to the Plan in addition to those specifically mentioned in this Note on a policy-by-policy basis?

Does it wish to respond to the specific comments made by:

- CPRE Kent;
- Berkeley Homes;
- Charterhouse;
- Kent County Council;
- Rydon Homes; and
- Taylor Wimpey.

The representation from Tunbridge Wells Borough Council proposes several detailed refinements to the Plan and its policies. It would be helpful if the Parish Council would indicate the extent to which it would be willing to incorporate the various comments into the Plan.

Protocol for responses

I would be grateful for responses to the matters raised in this Note by 6 February 2022.

Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

If certain responses are available before others, I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled please could it all come to me directly from Borough Council. In addition, please can all responses make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner

Cranbrook and Sissinghurst Neighbourhood Development Plan.

3 January 2023