

Bramber Neighbourhood Development Plan

Independent Examiner's Clarification Note

Context

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 is well-presented. The quality of the photographs and maps is very good. It results in a very readable and interesting document. The distinction between the policies and the supporting text is very clear. The use of colour adds to the overall attractiveness of the Plan. The various appendices provide comprehensive details on their specific areas.

The Plan provides a clear and distinctive vision for the neighbourhood area. It is proportionate to the parish and has focused on a series of distinctive matters.

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now in a position to raise some initial issues for clarification. They are mainly for the Parish Council. There are separate questions for the District Council.

The comments that are made on these points will be used to assist in the preparation of my report. They will also inform any potential modifications that may be necessary to the Plan to ensure that it meets the basic conditions.

Questions for the Parish Council

Aim B1

I can see the approach that the Parish Council has adopted in Section 5 of the Plan.

However, Aim B1 reads more as a process matter than as a non-land use matter which the Parish Council will pursue to consolidate the wider approach taken in the Plan (as is the case with Aims B2-B5).

As such I am minded to reposition Aim B1 as supporting text in Section 11 of the Plan. I am also minded to recommend that the 'early review' of a made neighbourhood plan begins within six months of the adoption of the emerging Local Plan.

Does the Parish Council have any observations on these propositions?

Policy B2

This is an excellent policy

Policy B4

Is the first part of the policy necessary as it largely repeats the relevant policy in the South Downs Local Plan?

If it is considered necessary, should the policy apply only within that part of the neighbourhood area within the National Park Authority?

In general terms to what extent has the Parish Council assessed the added value of this policy over and above the requirements of the Building Regulations?

Policy B7

With regards to the Clays Field proposed local green space how has the Parish Council assessed the extent to which it is local in scale and not an extensive tract of land?

Appendix C suggests that revisited this issue during the plan-making process. What caused this to take place?

What is the source of the Parish Council's contention about the visibility of the boundaries of the proposed local green space from within the site being a determining factor in its assessment as being 'local in scale'?

Policy B9

How was the work undertaken to establish the locally significant views?

How is the policy intended to be applied through the development management process? In particular does the Parish Council anticipate that the policy would apply throughout the shaded arcs of the identified locally significant views (as shown on Figure 7.4)?

Policy B10

The first two parts of the policy are land use based

Part 3 appears to relate specifically to a specific highway improvement. Is this assumption correct?

If so, I am minded to relocate it within the wider Plan to form an addition Aim

Does the Parish Council have any observations on this proposition?

Section 11

It is encouraging that the Parish Council sees the need for this element of the Plan.

I am minded to add a new paragraph 11.3 to address the issues highlighted above in Aim B1.

Question for the District Council

I note that the District Council supports the submitted Plan's intention to defer consideration of the provision of new dwellings in the neighbourhood area until the emerging Local Plan has been adopted and any 'made' neighbourhood plan at that time is reviewed.

Within this context please can the District Council advise to what extent other neighbourhood plans in the District have allocated land for residential development to contribute towards the 1500 dwellings required by Policy 15 of the adopted District Planning Framework?

Is the Local Plan Review timetable still proceeding to that available on the District Council's website and the Local Development Scheme?

Representations

Does the Parish Council wish to comment on any of the representations received on the Plan?

In particular does the Parish Council wish to comment on any element of the representation made by DHM Stallard on the proposed local green space at Clays Field (Policy B7)?

Protocol for responses

I would be grateful for responses to the various questions by 16 July 2020. Please let me know if this timetable may be challenging to meet. It reflects the factual basis of the questions raised.

In the event that 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 can all responses be sent to me by Horsham District Council and make direct reference to the policy/issue concerned.

Andrew Ashcroft

Independent Examiner

Bramber Neighbourhood Development Plan

22 June 2020