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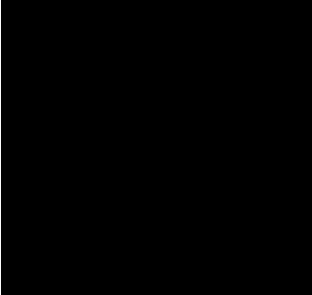
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16 May 2018



Dr A Leonard
Executive Director of Business Operations

Town Hall
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Hurst Green Neighbourhood Plan Meeting 11 May 2018

Further to the meeting on 11 May 2018 with yourself and Gary Kenchington and myself and Nichola Watters concerning the progressing of the Hurst Green NP, I have set out the options which, in our opinion, prevail at this time.

Under normal circumstances, the discussions would have related to the advice and assistance that could be provided from Rother DC to enable you pursue the production and making of a Neighbourhood Plan (NP) within the next eighteen months. However as discussed, you need to be aware of governmental changes to planning policy and processes which we believe put a very different slant on beginning a NP at this time. Our comments on the situation are as follows:

NP Project Plan

It is clear that this is now the start of the process (which has been delayed for reasons expressed at the meeting) and at present there is no timescale on the various stages. Given the need for the active members of the groups to gather and assemble the relevant evidence bases, get up to speed on planning matters, do all the work needed to understand policy parameters, do the call for sites, gather the evidence, appraise them, do the SEA and identify policy options for non-site themes, it is not anticipated that Reg 14 (Draft) stage would be reached until the beginning of next year at the earliest. It would be 9 months to Feb 19 and, from our experience, it has taken Crowhurst PC (with a strong SG) about 18 months to achieve the same objective of publishing its draft NP. At the meeting you indicated that you would speak with your consultants to see if this work could be fast tracked.

In addition to the above, there must be a public consultation – typically 8 weeks (although could be 6), so say late Feb – early April 2019 – then comments must all be reviewed and responses collated via the Consultation Statement, revision made to the NP (and possibly the SEA) and then submitted to RDC (under Reg 15). This could be by say June next year. RDC then undertake formal consultation (under Reg 16), say late June/July and then appoint an Examiner (with PC agreement). Assuming the consultation could be before the summer holidays, the Examination would be September 2019. Final adoption ('making') the Plan would easily be 6 months after that, following receipt of the examiner's report and the holding of a local referendum. This timescale reflects a reasonably optimistic estimate to complete the various stages of the NP process which is governed by Statute and Regulations.

However, by then the Core Strategy would be more than 5 years old, so the Examiner would most likely conclude that the Core Strategy was not an up-to-date strategic plan, as housing

needs would have increased. In essence, by then there is a major risk of the NP failing at examination or, at best, being out of date by the time it is published. This explains our concerns with including site allocations in the Neighbourhood Plan at this time.

Relationship of NP with DaSA

As explained the DaSA already includes Hurst Green as, at the date of publication, Hurst Green had not applied to prepare a Neighbourhood Plan. Furthermore, David Marlow Planning Policy Manager RDC has previously made it clear to all NP bodies at the NP Forum (in April 2017) that they needed to move quickly and get to Reg 14 by Spring/Summer this year, 2018. We are not sure if HG attended the Forum and were therefore aware of the impending difficulties of not meeting the timetable.

The other identified main point is that RDC has a significant housing land supply problem and we need to identify sites asap and show that the overall requirement is being met by the DaSA and NPs. That is why at the meeting we advised that the necessary housing sites for Hurst Green will need to continue to be identified via the DaSA. To not do so would leave both Hurst Green and the rest of Rother short of housing numbers (as it is extremely unlikely that a Hurst Green NP could reach the 'made' stage before the point at which the Core Strategy becomes out-dated).

Way forward

Much of what the NPSG want to do will not be dated by housing requirements – identifying and protecting valuable services, green spaces, historic buildings, etc. or design policies.

As far as housing sites are concerned, we need to complete the site identification/evaluation process for the DaSA over the next couple of months. We would be happy to engage directly with the NPSG during this time, so the DaSA has a local input. To this end, I would be happy to receive any information on further potential sites you may want us to consider in any around the village as soon as possible. I would just emphasise that the housing requirement is for the village of Hurst Green, not the parish, so sites should be well-related to the actual village.

Conclusion

In summary, we would welcome the Parish Council (PC) working with RDC to ensure that there are housing allocations in the DaSA that, as far as reasonable consistent with planning policies, meets the needs of Hurst Green and avoids having a planning policy vacuum, which could be exploited by developers seeking to achieve consents via appeal.

There is still the option of you proceeding with a Neighbourhood Plan bar housing site allocations. (The PC will still qualify for the higher level of CIL in this event.) As discussed, this view is predicated by timescale problems. In conclusion, you may wish to seek advice from your own consultants before determining what action you would wish to pursue.

Yours sincerely

Frank

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