

INDEPENDENT EXAMINATION OF BROADSTAIRS & ST. PETER'S NEIGHBOURHOOD PLAN

EXAMINER: DEREK STEBBING B.A. (Hons), Dip. E.P., MRTPI

Danielle Dunn
Clerk to the Town Council

Ian Poole
Places4People Planning Consultancy

Examination Ref: 01/DAS/BSPNP

Via email:

28 March 2019

Dear Ms Dunn and Mr Poole

BROADSTAIRS & ST. PETER'S NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Broadstairs & St. Peter's Neighbourhood Plan for examination, I would like to clarify several initial procedural matters. I also have two preliminary questions for Thanet District Council and the Qualifying Body.

1. Examination Documentation

I can confirm that I am satisfied that I have received a complete submission of the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement and the Regulation 16 representations, to enable me to undertake the examination.

Subject to my detailed assessment of the draft Plan, I have not at this initial stage identified any very significant and obvious flaws in the Plan that might lead me to advise that the examination should not proceed.

2. Site Visit

I intend to undertake a site visit to the Neighbourhood Plan Area during the week commencing 8th April 2019. This will assist in my assessment of the draft Plan, including the issues identified in the representations.

The site visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the Neighbourhood Area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

I have two preliminary questions seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response by **Thursday, 18th April 2019**.

5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 4-6 weeks of submission of the draft Plan.

As I have raised a number of questions, I must provide you with sufficient opportunity to reply. Consequentially, the examination timetable will be extended. Please be assured that I will seek to mitigate any delay as far as is practicable. The IPE office team will seek to keep you updated on the anticipated delivery date of the draft report.

If you or the Qualifying Body have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter and its Annex, and any responses to the initial questions that I have raised, are placed on both the local authority and Town Council websites.

Thank you in advance for your assistance.

Your sincerely

Derek Stebbing

Examiner

ANNEX - PRELIMINARY QUESTIONS

From my initial reading of the Broadstairs & St. Peter's Neighbourhood Plan and the supporting evidence, I have the following questions and requests for the Qualifying Body and Thanet District Council in relation to the Plan.

Question 1: Re. Paragraph 8.1.1 (Housing)

This paragraph states, inter alia, that *"To ensure a fair and open approach to housing provision in the Neighbourhood Area, this NDP supports housing provision being planned and delivered at the district Local Plan level through allocation of suitable sites and "windfall" housing development policies"*.

The Plan contains no further information relating to planned residential developments up to 2031.

In the context of the emerging Thanet Local Plan 2031, I shall need further information on the prospective Local Plan housing site allocations that fall within, or within close proximity to, the designated Neighbourhood Plan Area. I shall require this information in order to be able to assess whether a number of policies in the Plan, including Policies BSP1, BSP2, BSP4, BSP7 and BSP8, are consistent and compatible with any prospective residential developments that may be planned.

I therefore invite the District Council and the Qualifying Body to provide me with a Note setting out the presently identified prospective Local Plan Housing Site allocations within the Neighbourhood Plan area and within close proximity to it. I also request a Map at an appropriate scale identifying the allocation site boundaries.

Question 2: Re. Policy BSP9 (Design in Broadstairs & St. Peter's)

This policy, which should be read alongside Appendix 5, states that *"Large applications will need to supply a design statement"*

Neither the policy and its supporting justification nor Appendix 5 provide a definition of "Large applications" which would enable users of the Plan to fully understand the policy requirement.

The Government's definitions of Major and Minor planning applications are as follows:

Large Scale Major

- 200 or more dwellings or the site area for residential development is 4 hectares or more
- 10,000 sq m or more, or the site is 2 hectares or more

Small Scale Major

- 10 to 199 dwellings or the site area for residential development is 0.5 hectares and less than 4 hectares
- 1,000 sq m to 9,999 sq m, or the site area is 1 hectare and less than 2 hectares

Minor

- less than 10 dwellings or the site area for residential development is less than 0.5 hectares
- less than 1,000 sq m, or the site area is less than 1 hectare

I invite the District Council and the Qualifying Body to either confirm that "Large applications" in the context of Policy BSP9 conforms to the above Government definitions of Major planning applications or to provide me with a different definition based upon local (i.e. Thanet District Council) development management procedures.