

Halesworth 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 very well-presented. The distinction between the policies and the supporting text is very clear. Photographs produced to a high quality reinforce the issues included in the Plan. In combination these matters result in a very interesting document.

The Vision and Objectives of the Plan are very clear and well.

The distinction between the land use policies and Actions is clear. In many cases the Actions complement the policies.

The Design Guide, the Connectivity of Halesworth Town Centre and the various strands of supporting evidence are particularly helpful and informative supporting documents.

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 for the Town 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.

Points for Clarification and other comments on the policies

Policy ENV1

The policy does not set out the implications of Local Green Space designation. Was this deliberate?

The attractiveness and importance of the Millennium Green is self-evident. It is clear that it demonstrably special to the local community and holds a particular local significance. Nevertheless, has the Town Council carried out an assessment of the extent to which it is local in character and not an extensive tract of land (as set out in paragraph 102 of the NPPF)?

Policy ENV2

Could the policy implications simply rely on the identified Local Plan policy? The proposed wording of policy (exceptional circumstances) may not leave any meaningful distinction between the significance of a local green space designation (in Policy ENV1) and an open space designation (in Policy ENV2).

Policy HSG2

As submitted, the policy is a general statement rather than a land use policy. Is its intention that development proposals should be designed so that they demonstrate the way in which they deliver the identified objectives?

Policy ED1

I understand the reasoning which underpins the suggestion about flexible terms in the policy. However, 'flexible terms' is a commercial rather than a land use matter.

I am minded to recommend its deletion from the policy and to propose a general reference to the desirability of flexible business terms in the supporting text. Does the Town Council have any comments on this proposition?

In part A of the policy is there a reason why the 25% figure has been chosen?

Policy ED2

In part B of the policy is it realistic to expect than any new hotels should be located in the defined town centre?

Policy ED3

Is the intention of the policy that a new development should deliver some of the seven uses identified rather than all of the use?

Policy DH1

This is an excellent policy. It makes a strong connection with the excellent Design Guide and provides a local interpretation of Section 12 of the NPPF.

I am minded to recommend that part B of the policy is modified so that it can be used proportionately based on the nature of the proposal

I am also minded to recommend that part C of the policy is repositioned from the policy into the supporting text to reflect that it is a process rather than a policy issue.

Does the Town Council have any comments on these propositions?

Policy DH3

This is an excellent policy. It makes a strong connection with the approach in the NPPF and includes detailed local information on heritage assets.

Policy TM3

Is the policy necessary given that Part S of the Building Regulations is now in place?

Representations

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

In particular does it wish to comment on the representations from East Suffolk Council and the Halesworth Business Group?

Protocol for responses

I would be grateful for responses to the various questions by 4 October 2022. Please let me know if this timetable may be challenging to achieve. 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 East Suffolk Council and make direct reference to the policy/issue concerned.

Andrew Ashcroft

Independent Examiner

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12 September 2022