

**INDEPENDENT EXAMINATION OF THE ABBOTS BROMLEY  
NEIGHBOURHOOD PLAN**

EXAMINER: Andrew S Freeman BSc (Hons) DipTP DipEM FRTPI

Laura Parsons  
Clerk to Abbots Bromley Parish Council

Phil Stephenson  
Principal Planning Policy Officer  
East Staffordshire Borough Council

Examination Ref: 01/AF/ABNP

9 January 2023

Dear Ms Parsons and Mr Stephenson

**ABBOTS BROMLEY NEIGHBOURHOOD PLAN EXAMINATION**

Following the submission of the Abbots Bromley Neighbourhood Plan (the Plan) for examination, I would like to clarify several initial procedural matters. I also have 11 preliminary questions for Abbots Bromley Parish Council and two for East Staffordshire Borough Council, to which I would like to receive a written response(s) **by Monday 23 January 2023**.

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 (including the Strategic Environmental Assessment); the Consultation Statement; the Strategic Environmental Assessment Screening Opinion; 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 will aim to carry out a site visit to the neighbourhood plan area in the week beginning 23 January 2023. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The 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.

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

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

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from the Parish Council and the Borough Council, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) **by Monday 23 January 2023**.

#### 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. However, as I have raised questions, I must provide you with sufficient opportunity to reply. Consequentially, the examination timetable will be extended. Please be assured that I will aim 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 the Parish Council or Local Planning Authority 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 any subsequent response is placed on the Parish Council and Local Planning Authority websites.

Thank you in advance for your assistance.

Your sincerely

*Andrew Freeman*

Examiner

## ANNEX

From my initial reading of the Abbots Bromley Neighbourhood Plan and the supporting evidence, I have two questions for East Staffordshire Borough Council and 11 questions for Abbots Bromley Parish Council. I have requested the submission of response(s) **by Monday 23 January 2023**, although an earlier response would be much appreciated.

### Question for East Staffordshire Borough Council

1. Does the Borough Council have any comments that it wishes to make on the draft Neighbourhood Plan other than those set out in the comments of policy officers (ABB10)?
2. The Screening Opinion, at paragraph 8, indicates that Natural England (NE) will be consulted on the opinion. Is there any relevant response from NE other than its Regulation 16 response (ABB16)? If so, please supply a copy.

### Questions for Abbots Bromley Parish Council

3. Policy DAH1 – “high environmental protection performance”: Please suggest some text that could be added to the Interpretation and Guidance section to clarify the meaning.
4. Policy DAH3: How is “the main street” to be defined/identified?
5. Policy DAH3 – “buildings and structures that contribute to the special architectural or historic interest of the area”: How are these going to be identified by a potential developer? Do they comprise listed buildings and Buildings of Townscape Merit (Appendix 1)? Are any other buildings or structures to be included?
6. Policy DEC1: In taking account of Secretary of State’s new First Homes requirements (PPG on First Homes, Reference ID: 70-018-20210524), is there anything that the Parish Council feels needs to be added to the draft Neighbourhood Plan?
7. Policy DEC1- “identified local need”: Is this intended to be need as identified in AECOM’s Housing Needs Assessment for Abbots Bromley (including any successor document updating that need)?
8. Policy DEC1 – housing mix and types of sizes of accommodation: Should this requirement only apply to developments above a particular size threshold?
9. Policy DEC1 – How are “historically important garden spaces” going to be identified by a potential developer?
10. Policy DEC1 – flexible internal housing layouts: Is this an appropriate matter for planning policy and control? Should support for homeworking be expressed in some other way?
11. Policy DEC3 – “retention or replacement of community use facilities”: Is there clarity over what these comprise?
12. Policy DEC3 – “other buildings of townscape merit”: Are these such buildings as may be identified in Appendix 1 (and no other)?
13. Policy NGE2: Please comment on the representations of the Lead Local Flood Authority (ABB7).