

Pluckley Parish Council

PNP Review – Response to Examiner’s queries 15.11.2023

Examination Ref : 01/DAS/PNPR

Dear Mr Stebbing

Thank you for your emailed letter of 15th November, and the opportunity to respond to the 4 questions that you raise in the Annex. The Parish Council’s PNP Review steering committee makes the following points.

Question 1 Policy H1A and Map 7

We confirm that it should read para 7.8, not 7.18. There are no missing paragraphs.

In preparing the PNP Review, we examined where the Parish’s stated requirements might not be being met appropriately by existing plans.

A long-held priority of the Parish has been to preserve its particular landscape format. It comprises three settlement areas, separated by countryside-between. The centre of the parish was described in the adopted Parish Design Statement twenty years ago as the ‘Green Heart’ bringing the countryside to the very core, and described as ‘fundamental to the character of the village’. Maintaining this amenity has been held as a high priority in the Parish ever since.

The distance between Pluckley village and Pluckley Thorne measures some 600m only. It follows that any further development within this area would seriously erode the separateness of the settlement areas and change the character of the area.

When reviewing the Local Plan, we were concerned that the wording of policies SP7 and HOU5 were not clear and were open to different interpretation. Indeed, SP7 could even be in conflict with HOU3a, which governs Pluckley Thorne and its adjacent area. SP7 allows for development that would not **seriously** erode the gap between settlement areas. As stated above, even a modest development would threaten the gap, given the limited distance.

Policy HOU5 allows for development **adjoining or close to** the settlement area of Pluckley village. This could have led to development within the Green Heart area, which adjoins Pluckley Village.

Naturally, we wished to support and conform to the Local Plan policies but felt that clarification was required for those specific parts of the Green Heart accessible to the highway and not covered by other policies. The three blue-lined areas on map 7 are the areas we identified. We considered that the unique characteristics of these areas required policy wording that responded to and reflected their character. To draft a policy that would meet this need, in a clear and unambiguous way, without undermining the Local Plan policies, we sought advice from legal Counsel.

The advice we received from Counsel was that HOU5 was not particularly clear and invited clarification by the Neighbourhood Plan. Our H1A specifically does support the approval of ‘adjoining or close to’ development as regards Pluckley village, except where development would encroach on the Green Heart and erode the gap between the settlement areas.

Counsel drafted the form of words to provide this clarification, and these are the words used.

As counsel advised, we contend that this policy does not contradict or undermine the Local Plan but refines and defines it as it applies to these limited, specific character areas. So, while supporting and upholding the general principle, it adds an additional level of detail and a distinctly local approach without undermining the Local Plan.

Question 2. Policy H1A and Map 9

The steering committee concedes that the properties of Dering St Mary on Station Rd should be held within the confine of the Pluckley Station settlement area. In which case it is hardly appropriate to exclude the Station Rd Garage/Estuary Cars site. We are prepared to re-draw the confines on Map 9 to address that. It should be noted that the nature reserve owned by the Parish Council abuts to the rear of the properties Dering St May and Station Rd Garage/Estuary cars.

Question 3. Policy H2C Lighting

We concede that our proposed policy, which was copied from a draft of our neighbouring parish of Egerton, was over detailed. Since then, Egerton has refined its policy, it has been examined, and it meets our needs.

We therefore will replace our draft with identical language as here.

1. “Proposals for new development in the Plan area should be accompanied by a proposed lighting scheme which meets the requirements set out in Policy ENV4 of the adopted Ashford Local Plan, and the guidance contained in the Borough Council’s “Dark Skies” SPD.
2. Development proposals in the main settlement areas of Pluckley should seek to avoid the use of external lighting unless it is required for security and health and safety reasons, in order to avoid increased light pollution and a further reduction in the dark skies in those areas. Where external lighting is necessary for the reasons stated, lamps should be of 500 lumens or less for domestic purposes and installed at the lowest possible height to achieve the necessary level of lighting.
3. In all other parts of the Plan area, external lighting schemes should only include lamps of 500 lumens or less for domestic purposes and only use lamps above that level where required for agricultural use or security and where they are installed in suitable fixtures which prevent the upward spillage of light. All external lighting should be installed at the lowest possible height to achieve the necessary level of light.”

Question 4. Thorne Estate Garages Site.

No doubt the Borough Council will inform you that a planning application to develop three affordable homes on that site was approved at a full planning meeting of the Borough in November 2023. That application was supported by the Parish Council because (a) the questionnaire used in the PNP Review clearly identified residents’ approval for that number and type of new dwellings, and (b) this site came well ahead of all others in the adjudication of the call for potential sites.

These 3 dwellings add to the significant number of windfall homes already achieved since the Neighbourhood Plan was adopted, amounting to a 12% increase in dwellings in that period. We anticipate this pressure for housing to continue.

This reply was agreed by the Pluckley Parish Council at its meeting on December 5th 2023

Yours sincerely

Dr C Mark Taylor. Chairman.