

1. Introduction

- 1.1. This document provides an Executive Summary of the Battle Civil Parish (CP) Neighbourhood Plan Regulation 15 Submission to Rother District Council (RDC) and associated documents, prepared by the Neighbourhood Plan Steering Group (SG) for Battle Town Council (BTC). All the documents, which are listed in Section 3 were formally delivered to Battle Town Council who fully endorsed them for subsequent delivery to RDC. This summary is specifically aimed at providing an up-to-date briefing for everyone who looks at the many detailed documents that are the subject to the RDC Regulation 16 public consultation¹ and lists the documents concerned as well as providing background to them. Additionally, brief notes on “Next Steps” and subsequently “Plan Adopted” sections are provided. Appendix A provides a further view of the Neighbourhood Plan timeline. Appendix B shows a further reading resource link.

2. Reg. 15 Submission comments (*not* in priority order)

- 2.1. It should be noted that the SG undertook a very significant analysis of the BTC Regulation 14 public consultation comments and as a result there are some important changes included in the Regulation 15 Submission. In the consultation analysis process, there have also been many small editorial changes made – essentially to improve readability and comprehension. This is particularly true of the maps and their legends/keys, because some were sourced from an earlier epoch and are now used only for context setting.
- 2.2. One of the key findings in the analysis was that various aspirations were upper-most in many respondents’ minds and, for them, were possibly more important than considering potential dwellings numbers and the spatial consequences. Whilst resolving many housing sites and dwellings numbers issues, the SG has taken a leading step by completely re-writing “Section 7: Community Aspirations” of the Submission document. It now clearly describes the many local ambitions, in an organised structure. The Community Aspirations are vital to the future of the Civil Parish’s future overall planning infrastructure (e.g. housing developments, public transport, roads, public services, etc.). Following the lead of many other Neighbourhood Plans, the SG consequently proposed that BTC establishes a Sub-committee to monitor and review subsequent progress with the Plan and the Community Aspirations up to 2028. The SG proposed that a:

“Neighbourhood Plan Implementation, Monitoring and Review Sub-committee”,

reporting to the Planning & Transport Committee, comprising Councillors and co-opted volunteers, should be briefed to closely follow all aspects of the NP and, as necessary, update Policies during its timeline. This has been agreed in principle and among the wide-ranging impacts that the NP will have, the IMR Sub-committee will be tasked to ensure that progress is made on delivering the Community Aspirations by establishing the source(s) of necessary funds (e.g. CIL and other sources) and planning developments that implement BTC priorities.

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¹ RDC public consultation, 8 weeks: 2020-Dec-04 to 2021-Jan 29

2.3. The completely re-written “Section 7: Community Aspirations” has benefitted hugely from the 2020 consultation analysis, which led to a far greater understanding of local views and from the statutory bodies many technical requirements that a Plan has to achieve. The rewrite has lost nothing from the former Regulation 14 pre-submission document, but now has much more detail recording local residents wishes, but set-in context to ensure wishes, that are outside the spatial analysis of an NP, are not lost and can be incorporated into BTC policy in the years ahead.

(The SG thank all respondents for their many, many inputs to this process.)

2.4. Whilst not wishing to make an over-inflated point, the 2020-February/March public consultation received 148 responses² (i.e. 140 from the public and 8 from various “statutory bodies”). Some of these responses ran to tens of A4 pages and provided huge amounts of detail and references. This overall volume of response was unexpected and nearly overwhelming. Nevertheless, the SG has undertaken line-by-line ‘forensic analysis’ of every comment and point made.

2.5. The SG’s ‘Consultations responses’ document contains *every* comment made, a précis thereof and SG responses and comments; it amounts to 432 pages of A4 text! This has most helpfully been further précised by our consultant to provide a key summary (‘Consultation Statement’) for subsequent RDC review and Inspection. It is the SG belief that herein is the main evidence that the Plan now fully encompasses local concerns and needs, given the national government demands for housing developments, reflected by RDC in specific numbers, for future dwellings in the Civil Parish and many other non-spatial considerations.

2.6. It cannot be denied that some residents in the community will probably not be happy with the outcome of the “Preferred Sites” submitted to RDC, but the SG have very carefully balanced many conflicting issues raised during the consultation and the submission carries full BTC endorsement. For Battle, there has been the need to balance the large Blackfriars site and some more development to the south-east of the High Street with developments north and west of the High Street. Additional balancing of site location was considered to help protect heritage assets in the town centre, where some development offers were made, and the need to address cycling and walking aspirations.

Whereas for Netherfield, the balance has been with regard to keeping development closely within the village central core, since safe access, both vehicular and pedestrian, has a high priority for residents.

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² Data held in SG file: “Reg. 14 feedback collected (electronic and paper-based).xlsx”

- 2.7. One of the most important balances the SG have assured is that of the overall ‘country feel’ of the whole of the Battle CP. This is covered in the Reg. 15 submission in general and specifically in a very detailed analysis of the Local Green Spaces and Green Gaps proposed for long term protection from “ribbon” development. The SG have worked tirelessly to highlight in the Plan the importance of the CPs country surroundings, which provides the key character of the area for all who: live in, work in and visit the CP.
- 2.8. The Reg. 15 Submission includes in Appendix E frequent references to the ‘Battle CP Design Guidelines’ and ‘Character Appraisal’ – both of which are aimed at ensuring they are used as ‘material references’, that RDC, as the Local Planning Authority, must take into account when considering all Planning Applications within the Battle CP.

3. List of documents in submission package for RDC

	Title	No of pages
1	Battle CP NP Submission plan, 2020-11-18, which includes the map and statement that identifies the area to which the proposed neighbourhood development plan relates. The submission plan includes various appendices, schedules and annexes.	98
2	ANNEXE 1 - Battle CP Design Guidelines	61
3	ANNEXE 2 - Battle CP Character Appraisal	37
4	Battle CP NP Strategic Environmental Assessment, 2020-11-10	41
5	Battle CP NP Consultation Statement, 2020-Nov	183
6	Appendix (i) Communication engagement strategy	3
7	Appendix (ii) Questionnaires / surveys	2
8	Appendix (iii) Photographs of consultation events	3
9	Appendix (iv) Resources / literature from key consultation community events	1
10	Battle CP NP Basic Conditions Statement, 2020-11-10	22
	Total pages:	451

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4. Next Steps

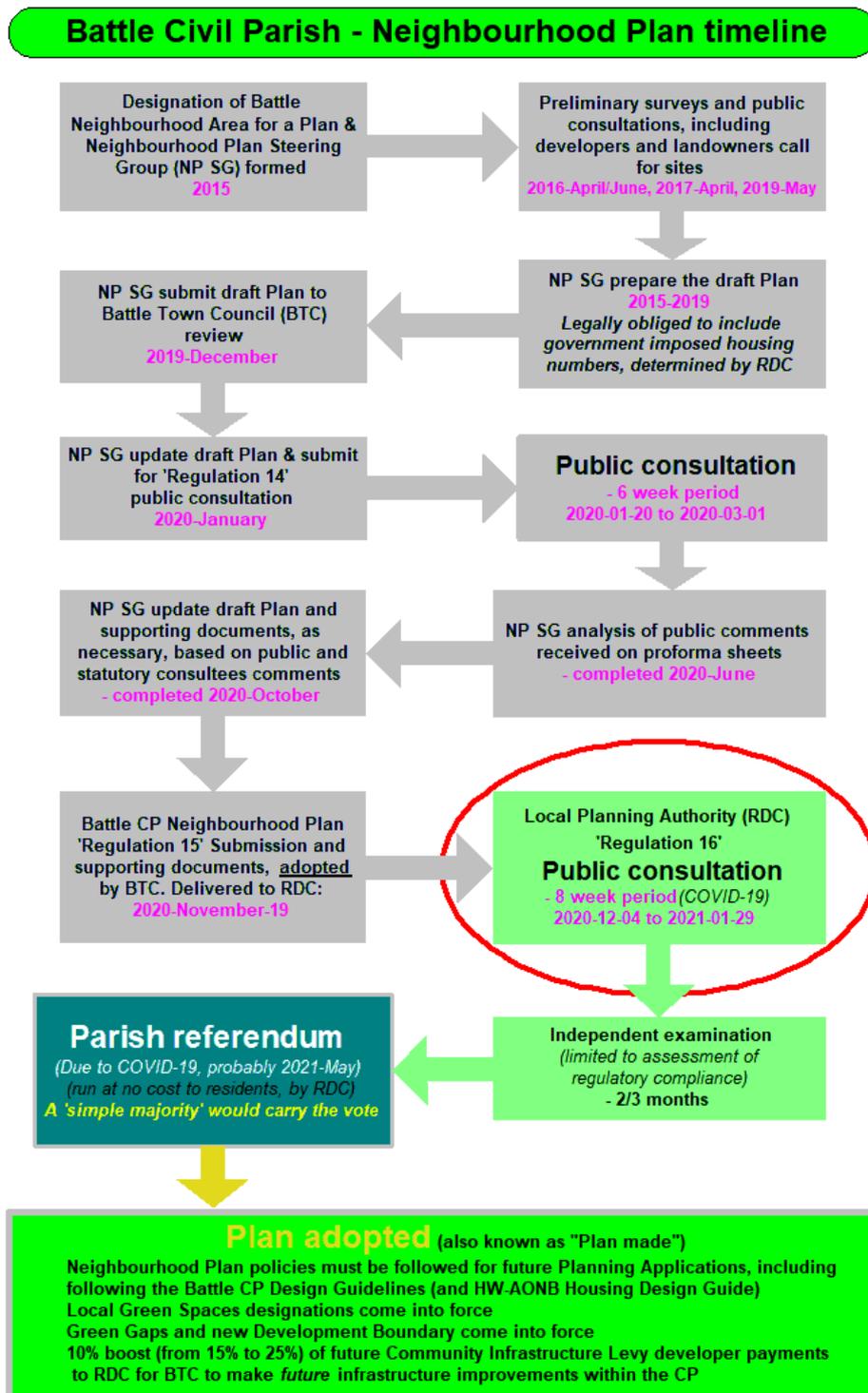
- 4.1. It is proposed that with effect from endorsing the Reg. 15 Submission, BTCs Planning and Transport Committee shall refer to the Neighbourhood Plan policies when considering planning applications and delivering comment to the Local Planning Authority (RDC).
- 4.2. Under RDC's Covid-19 regulations, they will hold an 8-week public consultation, commencing 2020-12-04.
- 4.3. Independent examination by a Planning Inspector (limited to assessment of regulatory compliance, 2-3 months), will follow the RDC public consultation.
- 4.4. Public parish referendum held by RDC, due to Covid-19 regulations, will probably not be until May 2021.
- 4.5. Due to the protracted timeframe for the processes detailed in paragraphs 4.2, 4.3 and 4.4 it is clear that BTC will need to maintain a high public profile about the Neighbourhood Plan and its benefits to the community right up to the referendum in 2021.
- 4.6. Plan adopted, if the majority of the registered electors of the Civil Parish support the Neighbourhood Plan.
- 4.7. It is proposed that BTC establishes a NP Implementation, Monitoring and Review Sub-committee, reporting to the Planning & Transport Committee (this should be an official Sub-committee of the Planning and Transport Committee), in order to provide oversight of the plan and in particular Community Aspirations and CIL funding.
- 4.8. After the referendum, the NP SG would hand over to the NP IMR Sub-committee, who will liaise in the future with RDC as required.

5. When the plan is adopted

- 5.1. Neighbourhood Plan policies must be followed by BTC and RDC for future planning applications, including following the Battle CP Design Guidelines and the High Weald AONB Housing Design Guide.
- 5.2. Local Green Spaces designations come into force.
- 5.3. Green Gaps and new Development Boundary come into force.
- 5.4. 10% boost (from 15% to 25%) of *future* Community Infrastructure Levy developer payments to BTC for infrastructure improvements across the Civil Parish.

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Appendix A: Timeline – start to completion - current at time of issue



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Appendix B: Further reading

Further reading may be accessed on-line at the ‘Locality’ website (the national Neighbourhood Planning resource) at:

<https://neighbourhoodplanning.org/wp-content/uploads/Locality-NP-Monitoring-Guide-Final-2019.09.11.pdf>

This guide entitled “After the Neighbourhood Plan is Made: Implementation, Monitoring and Review” provides a comprehensive toolkit for those who will take part in the proposed BTC Sub-committee.

Revisions / Versions:	
Date	Item
2020-08-03	Draft – for SG review/agreement to be sent to BTC explaining the Reg. 15 submission and its relationship with their already approved Reg. 14 Pre-submission document. – v1.1
2020-08-05	Minor updates of text – v1.2
2020-08-20	Minor edits - typing Section 2 updated with Documents table Section 4 & 5 added – v1.3
2020-08-21	Includes edits agreed in SG meeting – v1.4
2020-09-22	Layout edit in 3.4 and minor edits in SG meeting – v1.6
2020-10-10	Rearranged Sections, edited List of docs to delete: “% completed” column, as agreed by SG meeting Appendix A added – v1.7
2020-10-12	Edits to 2.2, 2.6 and throughout replacing WG with Sub-committee. Minor edits and Appendix B added – v1.8.2
2021-01-11	Major edit to repurpose for publication – v2.0
2021-01-16	Minor typos edits – v2.1