



## Growth and Communities

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### BY EMAIL ONLY

23 August 2021

Dear Sir / Madam

### Re: Tenterden Neighbourhood Plan 2013–2030 Pre-Submission Draft (Regulation 14)

Thank you for consulting Kent County Council (KCC) on the Tenterden Neighbourhood Plan 2013–2030: Pre-Submission Draft in accordance with the Neighbourhood Planning (General) Regulations 2012. The County Council has reviewed the Neighbourhood Plan and sets out its comments below, following the order of consultation document.

#### Section 2: Tenterden Today

Heritage Conservation: The County Council recommends that this section includes a short review of Tenterden's historic development, including both the town and the rural areas. Much of what follows in the existing text is predicated on an understanding of Tenterden's historic character and landscape, including several policies, and yet no information is presented on this until the heritage section on page 36. A summary presented earlier in the document would enable readers to better understand policies on various topics such as landscape character, green spaces, design and development, all of which are discussed before the heritage section.

#### Section 5 Neighbourhood Plan Policies

##### Environment

Sustainable Urban Drainage Systems (SuDS): The Neighbourhood Plan does not take into account the water environment. Tenterden does not have a significant extent of flood risk, however, areas of flood risk are associated with the Newmill Channel and Reading Sewer on the boundaries of the parish. The parish itself is traversed by some significant overland flow routes. Much of the parish area appears to have an underlying geology (Weald Clay) which is drains poorly. It is therefore very important that drainage provision within any new

development is appropriately considered in areas of potential flood risk and that potential impacts of new development are appropriately mitigated.

The County Council, as Lead Local Flood Authority, would recommend that the Neighbourhood Plan considers the importance of management of surface water within the parish and how it is taken account of within new development. It would be beneficial if the Neighbourhood Plan included a policy on surface water, to consider the type and form of drainage that should be included within new development.

Policies allocating housing sites should highlight the need to integrate sustainable drainage systems within green infrastructure. This approach is supported by the latest revision to the National Planning Policy Framework (NPPF) at paragraph 165 that states, “major development should incorporate sustainable drainage systems ..... [and] should where possible, provide multifunctional benefits.”

The County Council would also promote the consideration and protection of natural watercourses that support the natural environment and wider landscape, as appropriate.

KCC would recommend that the Parish Council refers to KCC’s Drainage and Planning Policy Statement (June 2017); particularly the drainage policies defined in Chapter 5. KCC would recommend that the natural drainage flow paths are maintained and would encourage the incorporation of any existing natural drainage features within the landscape.

### Landscape

Heritage Conservation: The text correctly identifies the historic nature of the landscape in and surrounding Tenterden. However, the individual historic features mentioned need to be considered as parts of a whole if their significance is to be appreciated and the right management decisions made. The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. The Kent Historic Landscape Characterisation (2001) is a tool for understanding this historic context and should be used to inform decisions taken regarding the landscape character of Ashford. Ideally this county level study should be deepened to be more relevant at the district and local level as has recently happened in the Hoo Peninsula and in Tunbridge Wells Borough. KCC would be happy to discuss further how this can be taken forward.

### Landscape

#### *Important Public Views*

Public Rights of Way (PRoW): Within the ‘Important Public Views’ image (from the Urban Confines Boundary), the legend of Important Public Views should label AB70 as a claimed route; it is awaiting determination, not adoption.

## *Development in the Countryside*

Heritage Conservation: Like much of Kent, Tenterden parish has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would, in many places, be consistent with the historic character of those areas. Historic England (with KCC and the Kent Downs AONB Unit) has published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character of the countryside. KCC would recommend that the Neighbourhood Plan identifies the guidance as part of its evidence base.

PRoW: The County Council recommends that reference is made to the Rights of Way Improvement Plan (ROWIP). This will help enable a continuation of the successful partnership working and delivery of improvements to the PRoW network in Tenterden.

It is requested that KCC is directly involved in future discussions regarding projects which will affect the PRoW network. KCC can then advise on the design and delivery of these projects, ensuring that new routes successfully integrate with the existing PRoW network. KCC welcomes future engagement to consider local aspirations for access improvements and potential funding sources for the delivery of these schemes.

The PRoW network is a vital component of the parish assets, providing significant opportunities for Active Travel. The PRoW network should therefore be specifically referenced alongside sustainable active travel where applicable, to encourage modal shift away from short car journey. This will enable KCC to deliver network improvements across the parish, which can provide sustainable transport choices and support growth in the region.

## Local Green Spaces

### *Policy TEN NP2*

PRoW: In respect of Local Green Spaces A-N, KCC recommends the inclusion of text to ensure any identified PRoW affected by, or in the wider area, benefit from improvements to strengthen off road connectivity to green spaces for all users.

## High Quality Design

### *Heritage*

Heritage Conservation: The review of Tenterden's more recent heritage presented in this section is useful but would benefit from being presented earlier in the document. The Neighbourhood Plan contains many earlier references to the historic character of the town and countryside but until this point in the document, there is no information to contextualise this. KCC would suggest this section be summarised in section 2 'Tenterden Today'. KCC would also recommend reference is made to a document produced by KCC in 2004 –

'Historic Town Survey of Tenterden'<sup>1</sup> – which reviews the known archaeological data for the town. Although issued some years ago, the document is still relevant and can be found online.

#### *Policy TEN NP4 – Design of New Development and Conservation*

Heritage Conservation: KCC welcomes this policy that will help ensure the historic character of the built-up areas of Tenterden parish are conserved and enhanced appropriately.

PRoW: The County Council requests reference to the Kent Design Guide and the ROWIP. The ROWIP can help contribute towards a robust infrastructure that enables development and encourages economic growth leading to regeneration and attraction of new businesses.

#### Tenterden, St Michaels, Smallhythe and Reading Street Conservation Areas

##### *Policy TEN NP5 – Tenterden, St Michaels, Smallhythe and Reading*

Heritage Conservation: KCC welcomes this policy that will help ensure the historic character of the built-up areas of Tenterden parish is conserved and enhanced appropriately.

#### Non-designated Heritage Assets

Heritage Conservation: KCC welcomes the consideration given in the Neighbourhood Plan to non-designated heritage assets. Such assets play a key role in the character of the Neighbourhood Plan area, whether in urban or rural contexts, and it is important that the development management process is used effectively to conserve and enhance them in the way indicated in the text. It should be noted, however, that non-designated heritage assets are not formal designations, and therefore it is not absolutely necessary that a finite list be identified as in Appendix 2. It should be noted in the text that other assets (than those in Appendix 2) may be identified during the planning process or subsequent to the completion of the Neighbourhood Plan, and these need to be treated in the same way as those in Appendix 2.

##### *Policy TEN NP7 – Non-designated heritage assets.*

Heritage Conservation: The County Council is supportive of this policy, although would recommend that it be modified to state that “*proposals should take into account the effect on the significance of a non-designated heritage asset identified in Appendix 2 or subsequently and wherever possible seek to protect and enhance the asset*”

#### Housing

PRoW: The County Council requests that Public Footpath AB31 is incorporated positively within any development proposals and Map 14 should show the route of AB31 for clarity. An increased population will undoubtedly add to the pressure and importance of the surrounding

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<sup>1</sup> ([Kent EUS: Downloads \(archaeologydataservice.ac.uk\)](https://kent.eus-downloads.archaeologydataservice.ac.uk))

PRoW network and the need for potential upgrades and improvements to the local network should be considered.

### Local Economy

#### *Objectives*

PROW: Tourism is an important industry for Kent and the landscape is a key attractor; sustainable tourism is a way of supporting rural areas, providing jobs and supporting community services. The PRoW network and the ROWIP has a critical role in this, and as such, there should be specific mention of the importance of the PRoW network. The Neighbourhood Plan should address supporting improvements to walking and cycling routes to achieve the Council's tourism objectives.

### St Michaels Local Centre

#### *Policy TEN NP10 -St Michaels Local Centre*

PRoW: The County Council requests specific mention of Public Footpath AB9 and the need for appropriate improvements to form part of any development to ensure good sustainable transport connections within the community which can link local amenities together. Replacing private vehicle journeys with active travel is to be encouraged.

### Existing Business Sites

#### *Policy TEN NP11 – Intensification, regeneration and expansion of existing business sites*

PRoW: All proposals for Areas A – D should consider the PRoW (detailed below) affected within the sites and wider area. This will help enable KCC to deliver network improvements which can provide sustainable transport choices and support growth in the parish.

- Site A Public Footpath AB62
- Site B Public Footpaths AB24, AB16 and AB21
- Site C Public Footpaths AB38A and AB36
- Site D Public Footpath AB49

### New business premises outside the built-up confines

#### *Policy TEN NP12 – New business premises outside the built up confines*

PRoW: KCC would recommend reference is made to the PRoW network and the need to promote sustainable transport opportunities. KCC seeks to improve and upgrade the PRoW network where it links with amenities, public transport nodes, work and education to increase the attractiveness of walking, cycling and riding as an alternative to driving. It is imperative that the character and value of rural roads connected to development sites should not be changed to a state that they become dangerous or unattractive for non-motorised traffic.

## Leisure, Health and Wellbeing

PROW: KCC welcomes inclusion of the PROW network and reference to the significance of sustainable transport. KCC recommends seeking opportunities for pedestrian and cycle link improvements to and from protected sites. There should be specific mention of the ROWIP as it is a statutory policy document for PROW, setting out a strategic approach for the protection and enhancement of PROW, connecting the wider community and green open spaces. The provision of high quality open green spaces and opportunities for outdoor recreation should be a priority. The Neighbourhood Plan should aim to increase the provision of accessible green spaces and improve opportunities to access this resource. There is a well-established body of evidence demonstrating that physical exercise in open green space can have a positive impact on mental health and wellbeing. Good public transport and active travel links with open spaces should be made available, so that the public are not dependent on private vehicle use for visiting these sites.

- OS2 – Tenterden Recreation Ground – PROW AB30 and AB33A. The Neighbourhood Plan should consider opportunities for greater connectivity.
- OS5 – Homewood School – PROW AB37 and AB12 – the Neighbourhood Plan should support improvements to boost connectivity.
- OS3 – Smallhythe Cricket Club – PROW AB35, AB32 and AB32 - the Neighbourhood Plan should consider improvements for greater off-road connections.

Public Health: KCC is supportive of the emphasis on having a healthy Tenterden, in particular, through including opportunities of the PROW network and improvement of leisure facilities (including green and open space). However, to ensure this is maximised, health and wellbeing should be a consistent thread throughout the entire Neighbourhood Plan. For example, with reference to Policies TEN NP11 and 12, where it is stated new businesses should have sufficient onsite parking, there could also be a consideration of facilities for sustainable and active modes of transport.

For each theme throughout the Neighbourhood Plan, evidence and data has been considered, apart from the theme of Leisure, Health and Wellbeing. This should be a consideration to understand the health needs of Tenterden which in turn will support the development of policies within the Neighbourhood Plan. Whilst on the whole, residents in Tenterden generally live in good health in comparison to the rest of England, within Kent and the Ashford Borough there are implications which need to be considered to protect, improve and support resident's health and wellbeing, including the high percentage of residents over the age of 65, in comparison to the rest of Kent and Ashford. Additionally, Tenterden has a significantly higher percentage of people reported as having a limiting long-term illness or disability than the rest of Ashford. This information is important to understand in the context of devising the Neighbourhood Plan to improve access to services such as leisure facilities, open space, retail and hospitality for residents.

Greater use of the evidence base is recommended. using data from the [Kent Joint Strategic Needs Assessment](#) (JSNA) and or other sources of public health data from the [Public Health](#)

[Outcomes Framework](#) (PHOF) including ward level data in addition to referencing how these policies support the [Kent Health and Wellbeing Strategy](#). Providing evidence of the health needs of the population is in line with the NPPF and will justify planning policies regarding health and wellbeing in addition to providing a better understanding of residents health needs and any impact new development may have on residents health and wellbeing.

## Public Open Space

### *Policy TEN NP15 – Site for Recreation Open Space*

PRoW: KCC is currently responding to planning consultations and negotiations for the Appledore Road site regarding PRoW AB12 and claimed route PRoW AB70 to ensure connection and enjoyment of routes are maintained.

## Routeways

### *Historic routeways*

Heritage Conservation: KCC supports the identification of historic routeways as a key element in the character of Tenterden parish. The routeways are best understood in the context of the historic landscape in which they lay and KCC would suggest an improved historic landscape characterisation is the more effective mechanism to carry this out.

### *Policy TEN NP16 – Historic Routeways*

Heritage Conservation: The County Council supports this policy.

## Public Rights of Way and long-distance routes

PROW: The PROW network provides significant opportunities for active travel and therefore should be referenced within this section of the Neighbourhood Plan. This will enable KCC to deliver network improvements across the area, which can provide sustainable transport choices and support growth in the region.

### *Policy TEN NP17 –Public Rights of Way*

PRoW: The County Council requests that this policy includes reference to the KCC ROWIP. This guide is intended to aid decision-making and promote good design in PRoW and countryside access management. The guide applies to both urban and rural locations and is intended to complement and, where appropriate, draw together relevant technical and design information, both national and local, which has already been published.

## Infrastructure

Waste Management: The County Council, as Waste Disposal Authority, acknowledges that there are currently no KCC waste management facilities within the Tenterden Parish. These

facilities are strategic in nature, serving a wide area, typically at borough level. The combined Ashford Waste Transfer Station and Household Waste Recycling Centre that serves the residents of Tenterden Parish, is at operational capacity and hence any increase in waste tonnages through in the future as a result of development would require mitigation. Therefore, the County Council would like to see reference to waste management facilities being essential infrastructure in the delivery of sustainable communities and. The County Council would also welcome support in the Neighbourhood Plan offered towards developments within the Tenterden Parish supporting necessary new waste infrastructure in the wider area.

#### *Policy TEN NP18 – Securing Infrastructure*

PROW: KCC would recommend that the PROW network is referenced as a part of necessary infrastructure to support sustainable development.

### **Appendix 2: Non-designated heritage assets**

Heritage Conservation: The list of identified non-designated heritage assets is incomplete and only contains a small number (48) of the known non-designated assets of Tenterden. The Kent Historic Environment Record (HER) contains records of 149 non-Listed buildings, historic farmsteads and archaeological monuments in the parish, and it is not clear why the 48 in Appendix 2 have been selected. Assets left off the list include a range of sites/buildings of significance, including but not limited to:

- Several 19<sup>th</sup> century former school buildings
- At least two milestones
- At least 90 historic farmsteads and outfarms
- Archaeological sites relating to former mills, windmills, brick and tile works and limekilns, ice houses and oast houses

Whilst KCC supports the commitment to gathering candidate sites for the Ashford Local Heritage List, it should be acknowledged that any list presented as in Appendix 2 must necessarily be provisional and partial. A strong statement should be attached stating that other non-designated heritage assets will be present in Tenterden, some of which may be presently unknown, and that Appendix 2 only contains a selection of known assets, and that it must not be assumed that sites or features not in Appendix 2 do not have heritage significance as defined in the NPPF.

### **Appendix 3: Associated Projects**

Highways and Transportation: The County Council, as Local Highway Authority, notes that there is limited consideration of highway and transportation matters within the Neighbourhood Plan. The County Council recommends that matters such as the existing highway network in the town and the provision of local bus services (including destinations and frequency of services) are considered within the Neighbourhood Plan.



*Project Theme: Routeways and transport*

- 1) Project 1 - The current Local Cycling and Walking Infrastructure Plan (LCWIP) is focused on Ashford town and does not focus on Tenterden. The Steering Group would need to commence discussions with Ashford Borough Council to determine who wrote the current LCWIP to see if there is scope to develop and implement a LCWIP for Tenterden.
- 2) Projects 3 and 4 - The Colonel Stephens Greenway Upgrade has issues regarding the application of a bound surface to Colonel Stephens Greenway. As KCC understands there were wildlife issues identified when the path was originally built, which meant an unbound path was more appropriate to ensure the delivery in a timely manner. KCC is still awaiting an estimate from Watermans for repair, drainage improvements and tree maintenance for this section as requested by Tenterden Parish Council. There is no identified funding for this and so this will need to be funded by the Town Council. KCC is unlikely to support or take on maintenance for new lighting here. This project should feature in the Town Council's Highway Improvement Plan (HIP) for future consideration by KCC.
- 3) Projects 11 and 12 – should refer to National Cycle Route NCR 18.
- 4) Project 13 – KCC is not aware of the Town Cycle Lane Feasibility Study but this will need to involve discussions between the Steering Group and KCC as Local Highway Authority in the first instance. There is currently no S106 funding towards such a project. This project should feature in the Town Council's Highway Improvement Plan (HIP) for future consideration by KCC.

*Project Theme: Transport Infrastructure*

- 1) Project 1 – whilst KCC is happy to support the Steering Group on the Sustainable Transport Action Plan, the writing of the Action Plan will need to be funded by the Town Council.

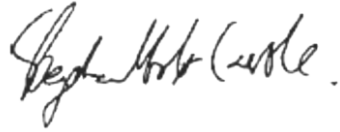
PRoW: KCC supports the PRoW schemes listed as projects and would welcome engagement on the LCWIP.

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The County Council will continue to work with the Parish Council on the formulation and delivery of the Neighbourhood Plan and welcomes further engagement as the Plan progresses.

If you require any further information or clarification on any matter in this letter, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Stephanie Holt-Castle". The signature is written in a cursive, flowing style.

**Stephanie Holt-Castle**  
Director – Growth and Communities