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8 September 2023

BY EMAIL ONLY

Dear Sir / Madam,

Re: Pluckley Neighbourhood Plan Review (2016-2031) - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Pluckley Neighbourhood Plan Review, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

3. Content and Methodology

Biodiversity: The County Council acknowledges that wildlife and ecology are referred to throughout the Neighbourhood Plan, however, it is recommended that there is a section dedicated to ecology to ensure focus on this important area of consideration. This should require all development to ensure that it is designed to follow the mitigation hierarchy, which is particularly relevant with the forthcoming Biodiversity Net Gain legislation from the Environment Act 2021. Developments should also aim to ensure that ecological connectivity through the Neighbourhood Plan area and beyond is maintained and enhanced.

The County Council would also advise that requirements for biodiversity enhancements should be incorporated into all new development.

5. Our Vision for Pluckley

Public Rights of Way (PRoW): As a general statement, the County Council is keen to ensure that its interests are represented within the local policy frameworks of the parishes and towns in Kent. The County Council is committed to working in partnership with the Pluckley

Neighbourhood Plan Steering Group to achieve the aims contained within the County Council [Rights of Way Improvement Plan](#) (ROWIP).

The County Council recognises that limited reference is made to the PRow network and the ROWIP. The ROWIP is a key policy document and the Pluckley Neighbourhood Plan Steering Group is urged to reference this within the Neighbourhood Plan, particularly in respect of sustainable travel and movement. This will enable successful joint partnership working to continue, which can support the delivery of improvements to the PRow network – for example, as mentioned within the ROWIP key themes ‘Evolution of the Network’ (EN04), ‘Rights with Responsibilities’ (RR01) and ‘Efficient Delivery’ (ED02). Joint delivery of the ROWIP will ensure significant benefits and potentially provide access to additional funding opportunities (Efficient Delivery - ED07).

The County Council would recommend that the Neighbourhood Plan includes an aim to provide high quality routes for pedestrians and cyclists to encourage more people to use sustainable modes of travel. This will bring health benefits to the local community and help to address vehicle congestion on the road network, by providing realistic alternatives to short distance car journeys. This can be achieved by working in partnership with the County Council to improve the existing network and identify opportunities for further evolution.

6. Managing the Rural Environment

PRow: The County Council would advise that the Neighbourhood Plan encourages and ensures connectivity is achieved without short car journeys, and that views and tranquillity are protected. Specific policy reference should also be made to the PRow network and any potential impacts on the character of the landscape, ensuring that views and user enjoyment are not harmed.

To ensure that funding opportunities can be accessed, the County Council would recommend that specific mention is given to the PRow network, the opportunities for connectivity and the benefits that are provided - for example, in respect of public health and tourism.

7. Housing

PRow: The County Council recognises that the contribution of the PRow network to sustainable communities is not mentioned within the Neighbourhood Plan. Development provides opportunities to create new links and enhance existing routes, which can encourage active travel. Policies should therefore clearly state that new developments should provide sustainable transport choices, with provision for walking and cycling routes that provide realistic alternatives to short distance car journeys. All relevant policies relating to growth and sustainable transport should include reference that any development **“incorporates, protects and (not or) enhances existing PRow, including Public Footpaths, Bridleways, Restricted Byways and Byways Open to all Traffic, as well as cycle routes”**.

Policy H1A – Windfall sites within or close to built-up confines

PRoW: The County Council recognises that only one site is identified as a windfall site (Thorne Garages). However, the Neighbourhood Plan should provide reference to the need for new development to provide opportunities for appropriate investment in the PRoW network, which can enhance opportunities for active travel and outdoor recreation across the wider parish. The County Council would welcome future engagement with the Pluckley Neighbourhood Plan Steering Group to consider local aspirations for these access improvements, which could be delivered through developer contributions.

Policy H2B - Encouraging Sustainable Development

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, notes that Policy H2B contains reference to the incorporation of SuDS to serve new developments. However, there is only a single reference made relating to surface water drainage or runoff. The County Council would therefore advise that this policy is amended and strengthened by including two new paragraphs:

“All major developments within the parish must strive to achieve greenfield runoff rates where possible. Where this is not possible, it must be demonstrated that there would not be an increase in flood risk to the neighbouring area.”

“Any future developments should ensure that the drainage system constructed is able to operate for the lifetime of the scheme and appropriately consider the future impacts from climate change. This must consider the increased frequency, duration, and intensity of storms, in line with wider published guidance.”

8. Economy and Communications

PRoW: The County Council notes that tourism is rightly identified as an important industry for the parish, and the landscape is a key attractor. Sustainable tourism supports rural areas and community services, and provides employment opportunities. The PRoW network and the ROWIP have a critical role in this, and policies in the Neighbourhood Plan should therefore mention the County Council’s support for improvements to walking and cycling routes where they can assist the Pluckley Neighbourhood Plan Steering Group’s tourism objectives.

9. Community and Leisure

PRoW: The County Council would advise that the PRoW network is included as part of the aim to protect the health and well-being of the community. The PRoW network provides substantial opportunities for active travel and outdoor recreation, and the ROWIP key theme ‘Active Lifestyles’ seeks to increase health and wellbeing benefits and address health inequalities. ‘Walking for Health’ walks can also lead to improvements in health, and active travel can aid reduction in air pollution levels through changes in transport modes.

The County Council recommends that policies should aim to increase the provision of accessible leisure and recreation spaces, and improve opportunities to access this resource with good public transport and active travel links. This will ensure that community facilities are easily accessible, so that residents and visitors are not dependant on private vehicle use for travelling across the parish.

10. Community Projects Management Plan

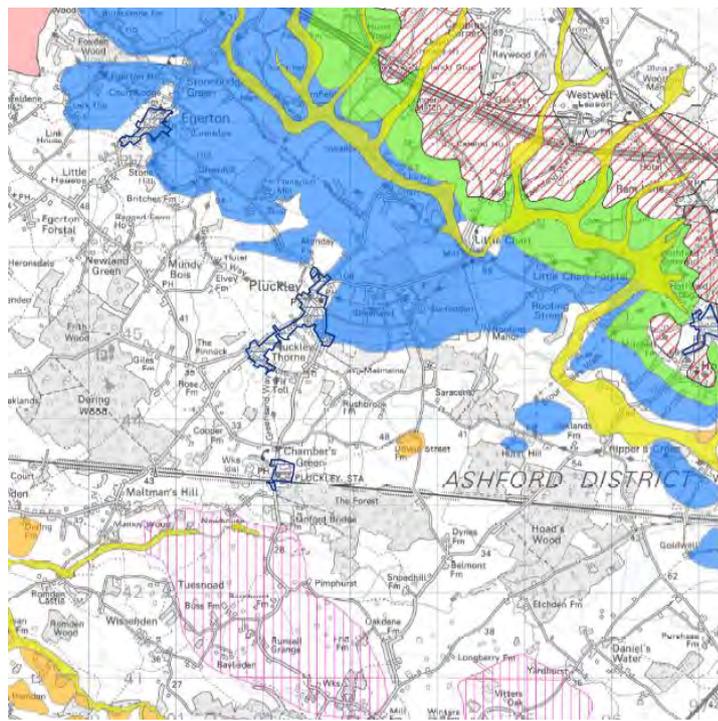
PRoW: The County Council would welcome future engagement with the Pluckley Neighbourhood Plan Steering Group to consider local aspirations for PRoW network improvements and potential funding sources for the delivery of these schemes.

Additional Comments

PRoW: It is recommended that the Neighbourhood Plan includes a PRoW Map for viewers to identify the locations of PRoW. A copy of the Definitive Map should be held by the Pluckley Neighbourhood Plan Steering Group, but is available upon request¹.

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, can confirm that there are no safeguarded waste management or mineral handling, processing and transportation infrastructure within the Neighbourhood Plan area. However, there are four safeguarded land-won minerals that occur within the Neighbourhood Plan area, as shown in an extract below from the Ashford Borough Council Mineral Safeguarding Area Proposals Map:

Ashford Borough Council Mineral Safeguarding Area Proposals Map



-  Limestone Hythe Formation (Kentish Ragstone)
-  River Terrace Deposits
-  Sub - Alluvial River Terrace Deposits
-  Limestone - Pauldina Limestone, Weald Clay Formation

¹ prow@kent.gov.uk

The County Council recognises that none of the safeguarded minerals are directly harmed by the proposed development in the Neighbourhood Plan area. However, it is recommended that the Neighbourhood Plan acknowledges the presence of these safeguarded minerals, particularly the extensive Hythe Formation (Kentish Ragstone) to the immediate east and north of the main settlement at Pluckley.

If windfall housing planning applications occur in these areas, a full Minerals Assessment would have to be undertaken. This should assess if there is a justification to override the presumption to safeguard the minerals (Policy CSM 5: Land-won Mineral Safeguarding of the [Kent Minerals and Waste Local Plan 2013-2030 \(Early Partial Review 2020\)](#) from the exemption criteria under Policy DM 7: Safeguarding Mineral Resources. The County Council would advise that the Neighbourhood Plan references the need for a Minerals Assessment to comprehensively reflect the policies of the adopted Development Plan for the area.

KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,



Stephanie Holt-Castle
Director for Growth and Communities