



Spatial Planning Team
Ashford Borough Council
Civil Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Growth and Communities

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 415673
Ask for: Francesca Potter
Email: Francesca.Potter@kent.gov.uk

9 February 2024

BY EMAIL ONLY

Dear Sir / Madam,

Re: Aldington and Bonnington Neighbourhood Plan – Regulation 16 Consultation

Thank you for consulting Kent County Council (the County Council) on the Aldington and Bonnington Neighbourhood Plan, 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.

2. About Aldington and Bonnington

Paragraph 2.7

Heritage Conservation: The text currently suggests that Aldington was the probable scene of the Roman invasions of 55/54 BC and AD43. This was presumably not the intention of the authors as Aldington is nowhere near the presumed landing place of the Romans at Deal (55/54 BC) and Richborough (AD 43) and they are probably referring to the general context of Kent in the Roman period. Nevertheless, the current text is confusing and the County Council would ask that this is amended. It is the view of the County Council that the text also ignores the earlier prehistory of the Neighbourhood Plan area as well as the subsequent history, jumping to the 20th century. The County Council has provided some detail within Appendix A which may be useful in providing additional information around the heritage interests of the area.

Public Rights of Way (PRoW): The County Council, in respect of PRoW, is keen to ensure its interests are represented within local policy frameworks across Kent. The County Council is committed to working in partnership with parish councils to achieve the aims contained

within the [Kent County Council Rights of Way Improvement Plan](#) (ROWIP). This aims to provide a high-quality PRow network, which will support the Kent economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent a great place to live, work and visit.

The County Council supports the draft Neighbourhood Plan and welcomes the amendments made following its response to the Regulation 14 consultation, particularly the inclusion of reference to the County Council's ROWIP. This will enable successful partnership working to continue and deliver improvements to the PRow network in the Parish.

About Aldington and Bonington

PRow: The County Council notes that this section still omits inclusion of the PRow network within the parish, comprising Public Footpaths, Bridleways and Byways. It is suggested that this is rectified. The County Council also suggests that the North Downs Way National Trail is included within this section.

Paragraph 2.15

PRow: in considering improving accessibility, it is recommended that this paragraph should reference the PRow network specifically, rather than just footpaths and cycle paths, to strengthen opportunities for funding improvements.

3. A Vision for Aldington and Bonington

Paragraph 3.1

Heritage Conservation: The draft Vision does not refer to the character of the Neighbourhood Plan area at all. It would be preferable if the quality of the area's built and historic character were acknowledged in the Vision, together with a commitment to enhance it.

Objective 1: Conserve the rural landscape character and views

Heritage Conservation: It should be noted that much of Kent 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, the County Council and the Kent Downs Unit have published guidance on [historic farmsteads in Kent](#) that considers how rural development proposals can be assessed for whether they are consistent with existing character – this guidance should be considered.

Objective 3: Celebrate our built heritage and achieve high quality design

Heritage Conservation: The County Council welcomes this objective and particularly the intention to develop a local design guide.

Objective 6: Manage the impact of traffic

PRoW: The County Council notes that the reference to working with “Kent Highways” is incorrect and should instead refer to working with County Council, as the Local Highway Authority, including for PRoW.

4. The Rural Environment

Flooding and Drainage

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, notes that its previous recommendations appear to have been considered and included within paragraph 4.35. The County Council does, however, feel this could be strengthened with regards to requiring new developments to restrict flows from site to no greater than existing run off rates or to even seek betterment if new developments are upstream of known flood issues; however, it is accepted that as stated (“*Drainage matters and the use of sustainable drainage are considered in ABC policies*”) sufficient protection will be offered.

PRoW: The County Council requests specific reference to the PRoW network within this section.

Policy AB4: Protection of local significant views

PRoW: The County Council welcomes specific reference to PRoW viewpoints and the commitment to work in partnership with the County Council in respect of PRoW matters.

5. Housing

Policy AB6: Residential windfall development

PRoW: The County Council requests specific reference to the PRoW network within this policy in relation to safe walking routes.

6. Character, Design and Heritage

Heritage Conservation: An issue related to heritage that the draft Neighbourhood Plan does not at present consider, is the impact of the historic environment on health and wellbeing. The current and substantial pressures in health and social care demand a search for innovative solutions in order to continue meeting, or ideally minimising, the demands of a modern population over the coming years. There is presently an ongoing shift from an acute and hospital-centred, illness-based system to a person-centric, health-based system that will rely upon individual and community assets. As such, heritage can play an important role in the contribution of the arts to person-centred, place-based care through means such as arts-on-prescription activities, cultural venues and community programmes. The historic environment, archaeology and heritage form part of our experience of being human and can provide individual as well as collective opportunities to engage with arts and culture whilst having positive effects on our physical and mental health and wellbeing in the process.

Policy AB8: Promoting Local Character through High Quality Design

PRoW: In respect of part C iv, the site context should include the PRoW network with regards to the significance of views.

Heritage Conservation: The County Council welcomes this policy. Careful design will help the Neighbourhood Plan area to retain its character. In respect of part C iv, an additional requirement could be added to be aware of past historic landscape use, and in particular, the patterns of tracks and lanes. To fully appreciate Aldington and Bonnington's historic landscape character, it is first important to understand it. The main method for investigating historic landscape character is by historic landscape characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape.

The [Kent Historic Landscape Characterisation \(2001\)](#) has identified the broad historic character of the landscape of Kent but more detailed refinement is needed to bring the baseline data for Ashford up to the standard of areas such as the High Weald and the Hoo Peninsula which have more detailed and relevant data. The County Council would welcome further engagement with the Parish Council on this.

Policy AB9: Energy Efficiency and Design

Heritage Conservation: The County Council welcomes this policy, especially part C, which relates to historic buildings. The text could also refer to the need to consult with the Historic England report [There's no Place Like Old Homes: Re-use and Recycle to Reduce Carbon' \(Historic England 2019\)](#). This could usefully be highlighted in the text as an encouragement to retain old buildings where possible.

Policy AB10: Renewable and community energy

PRoW: The County Council would recommend an amendment to strengthen the policy seeking to ensure "*opportunities are sought*".

Policy AB11: Conserving Heritage Assets

Heritage Conservation: In general terms, the County Council welcomes this policy which will make an important contribution to conserving and enhancing the Neighbourhood Plan area's historic character and assets.

Part A - the County Council questions why the list of non-designated heritage assets is limited to the eight examples given. The Neighbourhood Plan areas has a wealth of assets beyond just these. The government has explicitly confirmed that heritage assets include archaeological sites and so planning documents and plans that aim to comply with the National Planning Policy Framework (NPPF) must ensure that archaeological assets are properly considered¹.

¹ (<https://historicengland.org.uk/listing/selection-criteria/scheduling-selection/ahas-archaeology/>)

Commentary relating to paragraph 2.7 above illustrate the range of archaeological assets that could be considered.

Part C - any development proposal that has potential to impact on a heritage asset should be accompanied by a heritage statement. Where a proposal has potential to impact on archaeological remains, however, it is likely that a full archaeological desk-based assessment will be required, written by an appropriately qualified specialist. This should be highlighted in the text.

Paragraph 6.41

Heritage Conservation: The text should be corrected to refer to Historic England.

7. Transport and Movement

Policy AB12: Sustainable Travel

Highways and Transportation: The policy in part B quotes Figure 20 for improvements to cycle and pedestrian routes, but it is actually showing improvements to car parking at St Martin's Church – the County Council would ask that this is corrected.

PRoW: The County Council also recommends reference is made to NPPF paragraphs 104 and 124 to strengthen text and policy.

8. Vibrant Communities

Sports and Recreation: The reference to Sport England design guidance is welcomed.

Policy AB15: Camping and Caravans

PRoW: The County Council welcomes the inclusion of PRoW within policy.

10. Infrastructure Improvements and Provision

Paragraph 10.4

PRoW: The County Council welcomes the inclusion of the ROWIP and the intent for partnership working.

13. List of Evidence Documents

PRoW: The County Council welcomes inclusion of the ROWIP; the Village Green Registers for VG185 and VG230; and the viewpoints from the PRoW network.

Appendix C Design Guides and Codes for Aldington and Bonnington

PRoW: Overall, the County Council welcomes reference to the PRoW network and the ROWIP. However, the PRoW network must be referred to as such rather than the “Footpath network”. This would give the specific distinction between footways or private footpaths and legally recorded Public Rights of Way.

Appendix E Potential Improvement to the Public Rights of Way

Highways and Transportation: With reference to the Goldwell Lane/Calleywell Lane circuit, it would not be appropriate to make these roads one way or have a 20mph speed limit due to the rural nature of these roads and the fact that any speed limit reductions have to meet the criteria in [Setting Local Speed Limits](#) (which a 20mph zone would not do). This proposal should therefore be removed from the project list as it will not be supported by the County Council, as Local Highway Authority.

PRoW: The County Council does welcome the Parish Council aims for partnership working to enable funding and delivery of PRoW improvement schemes.

Additional Commentary

Minerals and Waste: The Neighbourhood Plan area does not contain any safeguarded mineral or waste facility, and thus any development the Plan identifies would not have to be considered against the safeguarding exemption provisions of Policy DM 8: Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities of the adopted Kent Minerals and Waste Local Plan 2013-30 (Early Partial Review 2020).

With regard to land-won minerals safeguarding matters, the Plan area has within it the following safeguarded mineral deposits - limestone deposit (Paludina Limestone), Sub-Alluvial River terrace Deposits and the Hythe Formation (Limestone-Kentish Ragstone). However, the Plan does not propose any additional development other than that identified in the adopted Ashford Local Plan. The County Council, as Minerals and Waste Planning Authority, therefore has no concerns for land-won mineral safeguarding in this instance.

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

Enc.

Appendix A: Heritage Conservation commentary regarding local area interest