

## Planning

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AshfordBoroughCouncil

Date: 28<sup>th</sup> June 2018

Dear Mr High,

### **Re: Position Letter relating to the Examination of the Bethersden Neighbourhood Development Plan**

Ashford Borough Council officers have now met with representatives of the Bethersden Neighbourhood Plan Steering Group / Bethersden Parish Council to discuss your Summary of Significant Issues report on the Bethersden Neighbourhood Plan (BNDP).

Although the parties are of the opinion that the Plan can be considered to meet the Basic Conditions of the Neighbourhood Planning regulations, it was agreed that some additional work would be required to ensure that the process undertaken can be shown to be wholly transparent.

The two areas for particular attention to ensure soundness of the Neighbourhood Plan appear to be 1) the policy issue surrounding the distinction between the provision of “affordable housing” and “local needs housing”, and the basis upon which this need is supported by the evidence available; and 2) the process issue regarding the consideration of local heritage assets in the assessment and allocation of development sites in the Plan and how that has been addressed through the SEA exercise. These are proposed to be addressed as follows:

#### *1) Affordable Housing / Local Needs Housing*

Ashford Borough Council has previously advised the BNDP Steering Group at Regulation 14 stage that the use of the term “Local Needs Housing” refers to a particular product and has a different policy approach than “Affordable Housing”. ‘Local needs’ housing schemes in the parent plan will generally refer to proposals on ‘exception’ sites rather than



allocations. The aspiration of the Neighbourhood Plan, as understood by ABC, is to increase the delivery of affordable housing on the three sites allocated in the BNDP from which local people may have an opportunity to benefit, at least in the first instance. Reference to “Local Needs Housing” within the Plan, therefore could more accurately be substituted by “affordable housing” as required locally.

The Steering Group’s aspiration, as stated to us, is to enable local access to the affordable units. This aspiration is compatible with the Parish-specific local connections criteria presented in Section 31 of the Ashford Housing Lettings Policy (May 2018). The Council’s policy is that over a two year period, 50% of properties from the Parishes listed that section – which includes Bethersden - will be offered to an applicant who meets the local connection criteria as detailed in that document.

The Parish Group intends to make targeted amendments to the Regulation 16 version of the plan to clarify this approach to housing delivery and the aspiration for housing to meet the requirements of local people.

## *2) SEA and the Neighbourhood Plan’s approach to site selection and Heritage Assets*

The background to the production of the Strategic Environmental Assessment (SEA) has been recounted previously. However, in summary, prior to the Regulation 14 consultation there had been no indication from the statutory bodies that the plan was likely to have any significant environmental affects and therefore a full SEA was not required despite consultation on the Screening of the SEA. Some time following the Regulation 14 consultation (and in response to the submission of a planning application on Site B), Historic England wrote to the Neighbourhood Plan group advising that it did not hold that view.

As a result, a Scoping Report was prepared and sent to Historic England, the Environment Agency and Natural England for its opinion. The indicators detailed in that Scoping Report were as follows:

- Impact of development allocation sites on the historic settlement form
- Impact of development allocation sites on the form and setting of the Bethersden Conservation Area.
- Impact of development site B on views and setting of grade 1 listed St Margaret’s Church, in particular on the approach north on Church Hill.

The Environment Agency and Natural England offered no objection to this report. Nor did Historic England in principle, although it advised that that these indicators were too specific, and that a more holistic approach to the impact of the plan on the significance, character and appearance of the area was more appropriate. The indicators were therefore changed, and the final Scope was agreed by Historic England as completed.

The SEA has now been expanded to consider those points identified in your report, the format and analytical structure in line with the equivalent document supporting Ashford Borough Council planning policy (the parent plan for this document). The non-technical summary has also now been included. The hierarchy of plan-making must be appreciated, and the SEA for the Local Plan should be taken into consideration and, indeed, read



alongside that produced for the Neighbourhood Plan. In this way, the assessment on page 21 of the SEA should be read alongside the higher level SEA for context.

In terms of the interrelationship between the SEA and the Steering Group's site selection process, it is accepted that the relationship between the two is not immediately obvious within the scope of the documents submitted for examination. However, site assessment and mitigation measures were revisited and substantially amplified as a result of the SEA and through correspondence with Historic England. The Parish Group has indicated that they are prepared to draft an additional Note to specifically highlight the measures through which the historic environment and notable assets were taken into account, and any impacts mitigated within amended policies, to accord with national and local planning policy requirements and statutory duties.

### *Actions*

The Bethersden Neighbourhood Plan Steering Group/Bethersden Parish Council proposes that the examination of the BNDP is held in abeyance pending the actions detailed above.

It is proposed that any further documents produced by BPC as a result of these actions would undergo public consultation following their completion, as per the Neighbourhood Planning (General) Regulations 2012. Consultation on any changes to the Regulation 16 Version of the BNDP that emerge as a result of this exercise would be limited to specific main changes only, and would likely take the form of a supplementary Regulation 16 consultation administered by ABC.

It is envisaged that the further work proposed could be completed by mid-August and, following consultation, could be submitted to you in late September / October 2018 for recommencement of the examination.

If you have any questions about any of the above, please contact me in the first instance.

Yours sincerely,



**Simon Cole**  
Head of Planning Policy

cc. Colin Tearle  
Bethersden Locum Parish Clerk

