

BETHERSDEN NEIGHBOURHOOD PLAN

Sustainability Appraisal Scoping Report

March 2017

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1. Introduction

- 1.1. This document is the scoping report for the Bethersden Neighbourhood Plan sustainability appraisal, incorporating the results of the Strategic Environmental Assessment (SEA) screening assessment.
- 1.2. This stage of the sustainability appraisal is the 'scoping' stage, compiling background information needed before a full sustainability appraisal can be undertaken. It establishes an evidence base for ongoing appraisal work and culminates in a framework of sustainability objectives. The information contained within this report will be used to assess how the emerging neighbourhood plan policies contribute towards sustainable development.
- 1.3. The Bethersden Neighbourhood Plan must be in conformity with the current overarching adopted plans for the area, which are currently the Ashford Borough Core Strategy and the supporting Tenterden and Rural Sites Development Plan Document (DPD). Both of these were subject to their own sustainability appraisals and this report has been informed by information contained within those assessments and associated Sustainability Appraisal Scoping Reports. It is to be noted that two of the three of the proposed allocations in the Bethersden NP were considered in the SA for the Tenterden and Rural Sites DPD¹. It should also be noted that the Bethersden NP will cover the period 2015-2030, to ensure that it is in-keeping with the new emerging Ashford Borough Local Plan 2030.

The Bethersden Neighbourhood Plan

- 1.4. The Bethersden NP project is led by Bethersden Parish Council who oversees a NP Steering Group which includes local councillors, residents and other community stakeholders. The Steering Group first outlined a proposal for a Neighbourhood Plan with their village community at the Bethersden Church Fete in August 2013. The steering group potentially seek to allocate development sites and where appropriate establish any local policies for Bethersden through the NP process.
- 1.5. Subsequently, the Parish Council formerly requested that Ashford Borough Council designate the administrative area of Bethersden Parish Council as a Neighbourhood Area on the 5th December 2013. Following a period of 6 weeks public consultation which closed on 24th January 2014, Ashford Borough Council formally approved the designation of the Bethersden Neighbourhood Area on the 13th February 2014 (See Figure 1).
- 1.6. The Bethersden NP objectives and vision for the plan are:
- Environmental:** Preserving the rural and open character of the village and the wider parish; protection of local habitats; expanding recreational needs and countryside accessibility; promoting sustainable drainage and energy.

¹ A minor portion of Site B was also considered in the SA of the TRS DPD.

Housing: Providing the right kind of housing for young people, and accessible housing for an aging population, including well-designed affordable housing.

Economy, Communications, Transport and Infrastructure: Encourage rural industry; retaining existing local services; enhancing the network of rural foot- and cycleways; promoting the digital economy; managing traffic flow and highway safety.

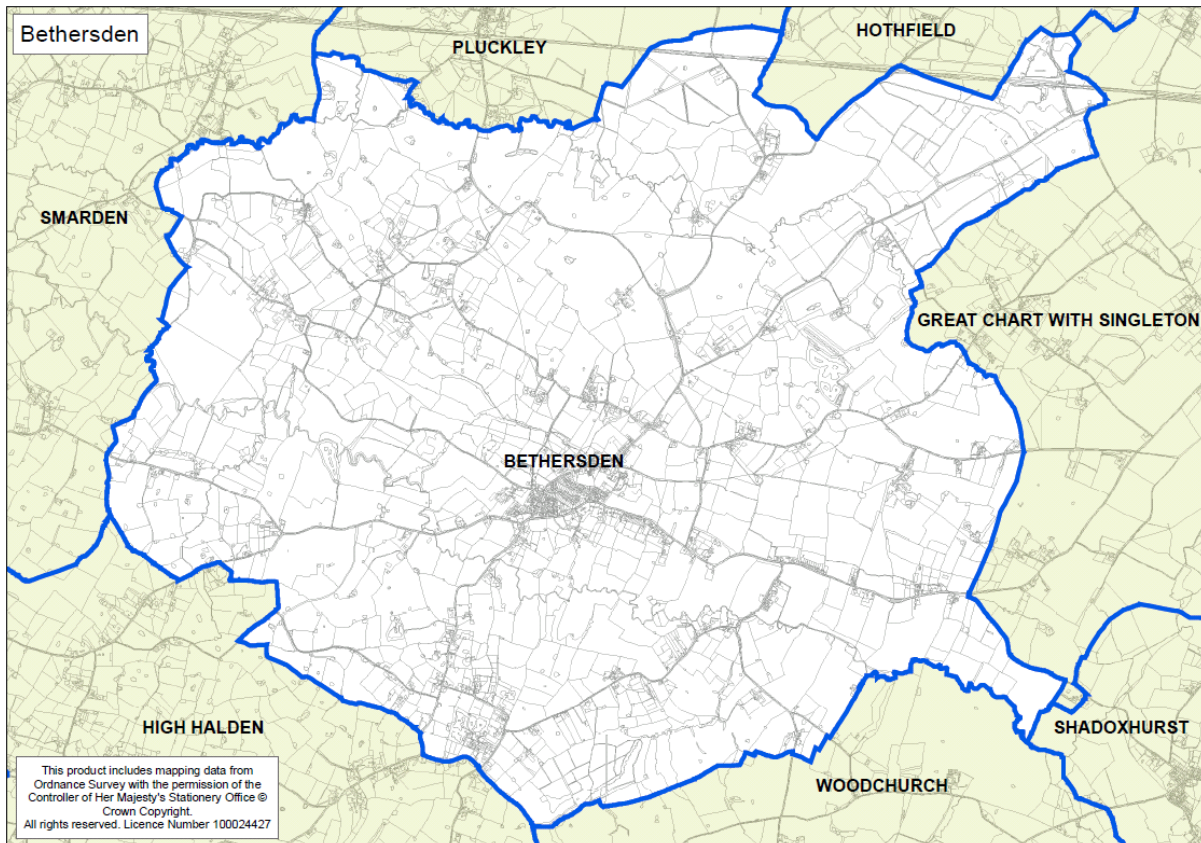


Figure 1: Bethersden Neighbourhood Area Boundary

Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA)

1.7. Delivering sustainable development² is the core principle underpinning the National Planning Policy Framework (NPPF) and the purpose of sustainability appraisal is to promote the objectives of sustainable development within planning policy. This is done by appraising the social, environmental and economic effects of a plan from the outset and in doing so, helping to ensure that sustainable development is treated in an integrated way in the preparation of the plan.

1.8. Under UK legislation, a Sustainability Appraisal is used to assess whether proposed plans and policies meet sustainable development objectives. Although SA must be

² The UK Sustainable Development Strategy defines the goal of sustainable development as “to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations”.

prepared for national and local development plans, the requirement for producing a SA for a NP is only considered necessary when³:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

1.9. Since the Bethersden NP is proposing to allocate sites, it is appropriate that a SA is undertaken. This will ensure that a wide range of sustainability objectives inform the plans progress.

1.10. There is a legal requirement to consider the need to carry out a Strategic Environmental Assessment (SEA) on plans which are determined likely to have significant environmental effects. This is in accordance with EU Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”, also known as the SEA Directive. The SEA Directive was transposed in England through The Environmental Assessment of Plans and Programmes Regulations 2004.

1.11. The SEA Directive 2001/42/EC requires an assessment of: “the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.”

1.12. A Habitats Regulations Assessment (HRA), in accordance with Article 6 (3) of the Habitats Directive 92/43/EEC is a further consideration in respect of the Bethersden NP. HRA concerns Natura 2000 sites, which are areas protected for their nature conservation value; these areas consist of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.

1.13. A screening opinion was undertaken on the requirement for an SEA and HRA for the Bethersden Neighbourhood Plan during September 2014. This screening opinion was consulted on in compliance with regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. This consultation identified that the Bethersden NP was unlikely to have any significant and /or negative environmental effects, including impact on European designated habitats

³ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/> Revision date: 09 02

or species. Therefore the screening assessment recommended that a full SEA/HRA did not need to be undertaken for the NP.

1.14. Following the Regulation 14 consultation on the Draft Neighbourhood Plan in 2016, extensive representation was received from Historic England which considered that the Plan was likely to have significant environmental effects on the historical environment, through the proposal of three housing allocations, two within the Bethersden Conservation Area, and all of which would affect the setting of a number of listed buildings, and that an SEA may now be required unless the site allocation policies have previously been considered within the SEA of a higher level or equivalent plan document. An extension to the screening assessment has therefore been drawn up with the recommendation that an SEA is now required for the NP in respect of the likely significant effects of the NP on cultural heritage including architectural and archaeological heritage and is found as an appendix to the 2014 screening opinion. These two documents should, therefore, be read together.

2. Methodology

Stages of the Sustainability Appraisal

2.1. The SA of the Bethersden NP will be produced in accordance with the online Planning Practice Guidance on 'Strategic environmental assessment process' for neighbourhood plans⁴. This set out a 6 stage process for SA creation (See Figure 2). This report currently covers Stage B of the process, with the first stage having been completed as the 'screening'.

⁴ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Strategic-environmental-assessment-process> [Accessed 20/02/2017]

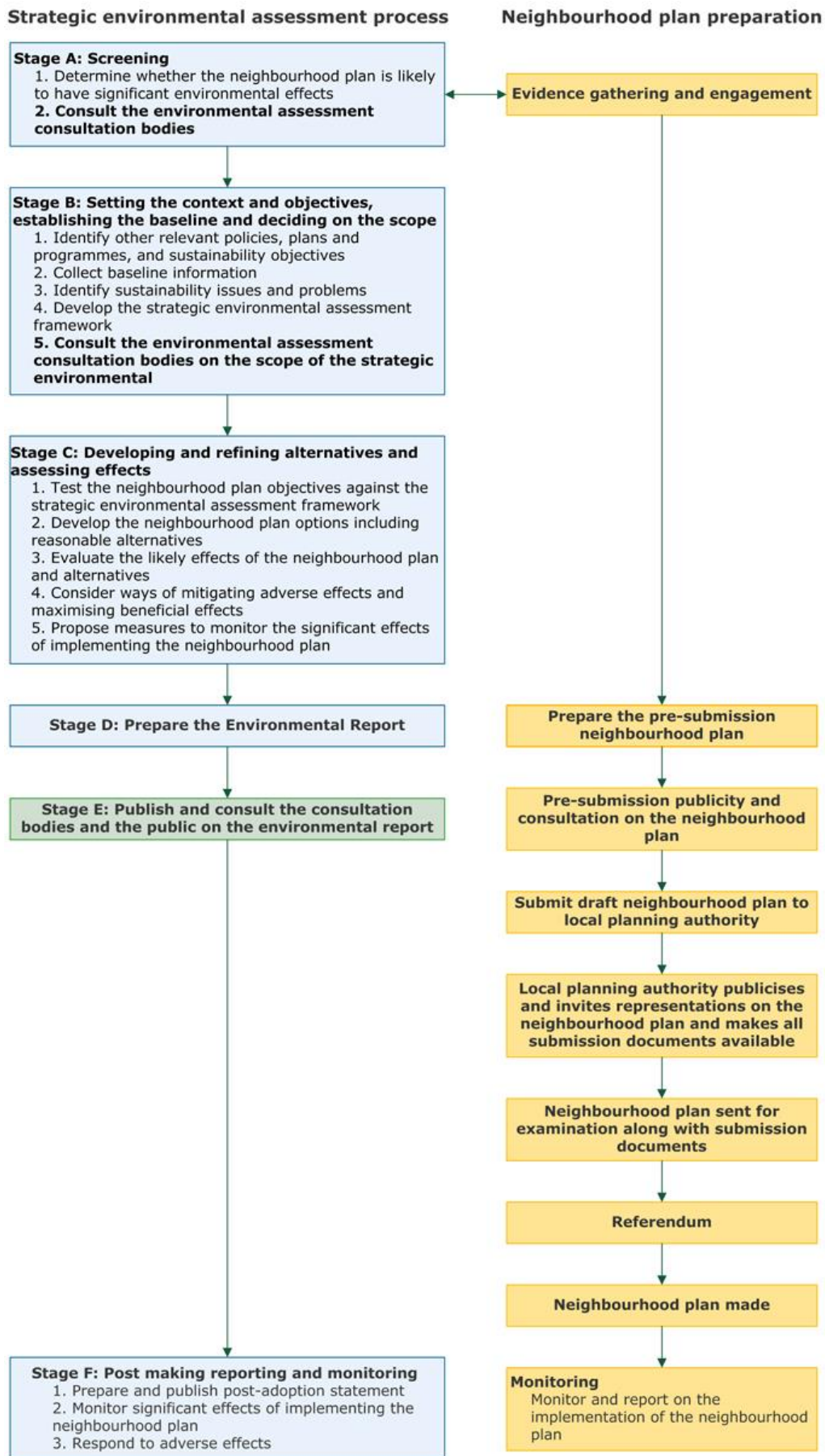


Figure 2: The key stages of Neighbourhood Plan preparation and their relationship with the sustainability appraisal process.

Scope of the Sustainability Appraisal

2.2. The sustainability topics considered in this scoping report encompass those required by the SEA Directive but include wider economic and social considerations to ensure it covers the topic areas required for an SA. These have been informed by the National Planning Policy Framework (NPPF) and the sustainability appraisal of the Ashford Borough Core Strategy. Topics identified in the emerging Ashford Borough Local Plan 2030 Sustainability Appraisal have also been considered.

2.3. In accordance with the guidance⁵ this scoping report will only focus on what is needed to assess the likely *significant* effects of the Neighbourhood Plan, taking into consideration the content and level of detail of the Neighbourhood Plan in question.

2.4. Within Stage A, it was determined that the Bethersden Neighbourhood Plan would potentially have impacts on the Historic Environment, but that it was unlikely to impact any other dimension of sustainable development (environmental, social or economic). For this reason, the scope of the SEA should be limited to a consideration of Cultural Heritage and Archaeology.

3. Stage A1 - Identifying other relevant, policies, plans and programmes, and sustainability objectives

3.1. The Bethersden Neighbourhood Plan may be influenced in particular ways by other plans or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. Documenting these influences is an important part of the sustainability appraisal process as it ensures the neighbourhood planning work is consistent with up to date policy, is informed by sound information and also helps in the process of identifying environmental and sustainability issues.

Review of plans, policies and objectives relevant to Bethersden

3.2. A review of International, national, regional and local level documents have been undertaken by Ashford Borough Council and documented in both the Core Strategy SA Scoping Report and the SA scoping report for the emerging Ashford Borough Local Plan 2030. There are also a number of documents that contain local-level information that are of specific relevance to the Bethersden Neighbourhood Area and which need to be taken into account during the preparation of the Neighbourhood Plan development. All relevant documents are listed below in Table 1:

⁵ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/> [Accessed 20/02/2017]

Table 1: Documents, policies and plans relevant to identifying the baseline information for the Bethersden Neighbourhood Plan

Document level	Document, purpose and relevant to Neighbourhood Plan/SEA
National:	<i>National Planning Policy Framework (NPPF)</i> - The NPPF must be complied with in its entirety. There are particular chapters relevant to Neighbourhood Plan making.
	<i>National Planning Practice Guidance (PPG)</i> - To provide further detail and application of policies in the NPPF. The Neighbourhood Plan should have regard to this guidance.
	<i>Principles Policies and Guidance for the Sustainable Management of Historic Environment (2007)</i> - To support the quality of decision-making, creating a management regime for all aspects of the historic environment. Neighbourhood Plan should have regard to this guidance in its historic objectives, policies and targets.
	<i>Historic England 'Heritage at risk' Register (2016)</i> - https://www.historicengland.org.uk/advice/heritage-at-risk/search-register/ The annual Heritage at Risk programme provides a dynamic picture of the health of England's built heritage, it lists the sites most at risk of being lost through neglect, decay or inappropriate development.
County:	<i>Kent Design Guide (2005/06)</i> provides criteria to achieve high standards of design, specifically referring to design in Kent.
	<i>Kent Historic Environment Record (updated as necessary)</i> http://webapps.kent.gov.uk/KCC.ExploringKentsPast.Web.Sites.Public.Default.aspx The HER is an online database of archaeological sites, finds and buildings in Kent. Using this website you can explore the rich heritage of your local area, including parishes.
Borough:	<i>Ashford Sustainable Community Strategy (2008–2018)</i> sets out the key theme areas and clearly states what issues are important to the local community and what key objectives the Ashford Partnership intends to achieve over the next ten years.
Parish:	<i>The Bethersden Parish Plan (2003)</i> - Sets out how the village should develop to meet the current and future needs of the community, while retaining its essential character. The Parish Plan comprises four sections: 1. Village Design Statement (VDS) - Provides a detailed record of the design characteristic of the village and its surroundings, with detailed

	<p>pictures of the wide range of buildings and features which define the character, heritage, setting and views of the community.</p> <p>2. Village Appraisal - The Village Appraisal was based on detailed research into the current state of the village, in terms of facilities, services and good and less satisfactory features. Subjects covered included Traffic & Transport, Crime Prevention, Local Economy, Health Care, Recycling, Recreation and Playground facilities, Mobility, and Youth (facilities for young people).</p> <p>3. Housing Needs- This section identified the specific housing requirements of the community based on a detailed parish wide survey carried out in 2001/2002 and updated in a further survey in October 2008.</p> <p>4. The Action Plan- The Action Plan summarises the results of the first three sections into a list of projects, and identifies those responsible and the timing for project completion.</p>
	<p><i>Bethersden Neighbourhood Survey (2014)</i></p> <p>Identified local priorities for development within Bethersden village and parish for the period to 2030.</p>

4. Stage A2 - Baseline information

4.1. Baseline information identifies what is currently happening in Bethersden and the likely future state of the area if current trends were to continue. It provides the basis for predicting and monitoring environmental and sustainability effects on the historic environment of the neighbourhood plan and helps to identify problems and alternative ways of dealing with them.

4.2. A practical approach to the collection of baseline information is essential as there will be opportunities to update the sustainability appraisal scoping work as further consultation is undertaken. Gaps in data may be identified and if so they will be identified in this report. Stakeholders will have an important role to play in this process; local people, developers, advisors and statutory consultees will provide information and feedback which will inform the neighbourhood plan as it progresses.

4.3. This section of the report outlines a summary of the baseline information for Bethersden set out by sustainability topic as discussed in Section 2 above. This information will provide the basis for understanding what the key historic environment sustainability issues are in the NP area and it will influence the type of sustainability objectives that are chosen for the ongoing assessment of the neighbourhood plan.

Cultural Heritage & Archaeology Baseline Information

4.4. No mention is made of the actual settlement of Bethersden in the Domesday Book, but Archbishop Hubert about the year 1194 confirmed "*ecclesiam S. Margaretse de*

Beatrichesdenne cum bosco et decimis et cum capella de Hecchisdenne” (referring to Etchden at the north-west of the parish) to the Priory of St. Gregory in Canterbury, so that a church had been built here and endowed prior to that date. The settlement was known as Baedericedaenne, the end of the name meaning it was a cleared pasture in the Wealden woodland.

4.5. Settlement was developed east of the church, along The Street along the original Ashford – Tenterden road. The Street was historically residential (although it included some shops). The small settlement at Forge Hill grew up following the diversion of the Ashford-Tenterden road south of the village, and was more commercial and industrial (hence its name) in character. The Bethersden Conservation Area was designated on 25th January 1974. This covered this developmental arc, including the ring of small fields or paddocks that served the village, and now constitute George Field, and the area now developed as Forgefield. The fields to the west of Church Hill were added to the Conservation Area in April 1996, and are considered remnants of this historic ring of fields and paddocks serving the village, and serving the rural setting of the main settlement and, in particular, the approach to the Church of St Margaret.

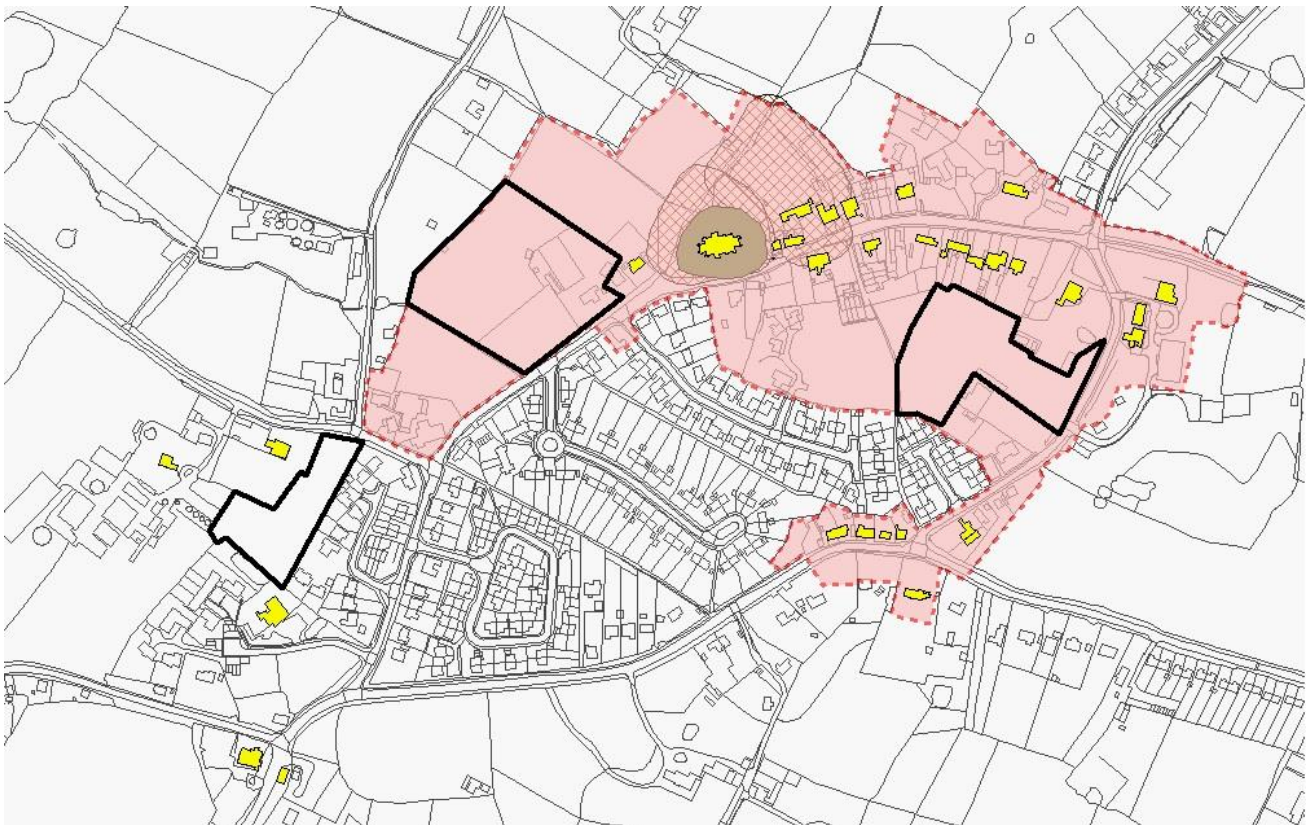


Figure 3: Map showing the Bethersden Conservation Area, listed buildings (yellow), and proposed site allocations (outlined in black)

- 4.6. While there are a number of listed buildings dotted around the parish, largely constituting listed farmsteads as a result of the Parish's agricultural heritage, the greatest concentration of the Parish's cultural and historic patrimony is centred within the village itself, both within and adjoining its designated Conservation Area.
- 4.7. Two of the three proposed allocations are wholly within the Bethersden Conservation Area, while the other is adjacent to the south-west. There are numerous other listed buildings, the majority of which are situated at the core of the village within the BCA, but there are some dispersed farmsteads surrounding the third allocation to the south-west.
- 4.8. It is important to note that Bethersden Marble – a fossiliferous freshwater limestone that polishes well to produce a marble-like effect – was quarried in the parish, and was used locally on several buildings, including the church here and on Canterbury and Rochester Cathedrals, as well as the Dering Arms in Pluckley.
- 4.9. The area of archaeological potential is centred at the area immediately surrounding the church, as the early medieval core of the settlement to the north of the original Ashford-Tenterden road. There are no scheduled monuments in the vicinity of the allocations.
- 4.10. A schedule of Listed Buildings within the BCA follows:

Grade I - Church of St Margaret

The Parish Church of St. Margaret's, which is the largest single structure in the village. It is a mediaeval church which was first mentioned around 1100 and is built mainly of ragstone but also includes some locally-quarried Bethersden Marble. The church occupies a commanding position at the crest of Church Hill before the road slopes down to a lower level where it becomes School Road.

Grade II - Court Lodge; Church Cottage; Bethersden War Memorial; Street Cottage; The George Pub; Box Cottage and Rose Cottage; Bethersden Post Office and Wood Cottage Luton Cottage; Rose Court; Johns Cottages; Prospect Cottages, Fleur Cottage and Cudhill; Elizabeth House; Jasmine House; Melville House; Sunnyside; Thorne Farmhouse; Weatherboarded Barn South-West of Thorne Farmhouse; Oast to South of Thorne Farmhouse; Beacon House; Renfrew (and Forge Cottage); Forge Dene; Haffendens; Newtown; Forge Corner Stores and the Laurels; Laurel Cottage

- 4.11. A number of additional listed buildings are situated within the area immediately surrounding the BCA, as follows:

Grade II – Lovelace Farmhouse; Farmhouse to SW of Lovelace Farmhouse and Oasthouse; Whiston (formerly the Vicarage); Bull Inn; Stables of the Bull Inn; Buildings at Batemans Corner; Mill Farmhouse.

- 4.12. The Parish's historic built structures are largely agricultural farmsteads (many of which are now in private residential ownership) set in the Low Weald landscape. The main settlement, Bethersden, contains a designed Conservation Area as a result of the special historic built form, which focuses on the Church of St Margaret and The Street. The wider area would once have been constituted by smallholdings and individual paddocks serving the settlement. Many of these were infilled in the Victorian era. Forge Corner centred on more commercial activities with the blacksmith's forge and carpenters' workshops ideally placed on the main road from Ashford to Tenterden. There is particular use of Pluckley red brick and Kent Peg tiles. The Conservation Area also has several important open spaces and fields, and the fact that there is no "backland development", plus the vistas through the spaces between the buildings, both contribute to a general sense of openness in this part of the village.
- 4.13. The Bethersden Village Design Statement (VDS, 2003) gives a detailed assessment of the design character areas relating to the village, to be used as a guide for newer development. The VDS gives detailed advice as to the urban grain and character, and relates the design tropes at particular points in the settlement. Without wishing to repeat the guidance, the essential character of Bethersden is that of a small relatively self contained rural village. While it has individual features which are found in many villages in this part of Kent, it is the way these elements are combined, particularly in the Conservation Area, which gives the village its distinctive character, based on a harmonious mix of buildings of different styles and size, and with varying plot size and spacing from the road.
- 4.14. More recent developments have been outside the Conservation Area and include estates of privately owned houses and also council houses some of which are now privately owned. Much of this development adopted contemporary suburban housing designs, materials and layouts with regular spacings between buildings and to the road, rather than drawing on the attractive character of the built environment in the Conservation area. This is unfortunate, and has gradually detracted over time from the overall character of the settlement. These developments are mainly on the south and west side of School Road, with ready access to the school and the village shops.
- 4.15. The Neighbourhood Plan, therefore, seeks to raise the bar both in design and execution of new buildings. This builds on the success of the VDS in informing new development, with the well-integrated George Fields development raising local quality while enhancing local access to open space.

5. Stage A3 - Key sustainability issues and options

5.1. The guidance on producing an SA requires that the existing environmental and sustainability issues are identified and taken into account. The aim of this task is to identify all of the issues potentially affecting Bethersden and then set out how the NP will need to address these issues to ensure development or policies are the most sustainable.

5.2. The review of plans and data about the Parish, have identified the following sustainability issues:

- 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 I listed St Margaret's Church, in particular on the approach north on Church Hill.

5.3. It should be noted that consultation on this Scoping Report may identify further issues or amend those stated above.

6. Stage A4 - Sustainability Appraisal Framework

6.1. The Sustainability Appraisal Framework consists of sustainability objectives which provide a way in which the effects of the neighbourhood plan can be described, analysed and compared.

6.2. Sustainability appraisal objectives are different in concept and purpose from the objectives of the neighbourhood plan, though there is a degree of overlap. They are not necessarily intended to be achievable, but are more aspirational in nature, addressing the full cross-section of sustainability issues, including social, economic and environmental factors laid down by law or policy.

6.3. Current guidance on land use and spatial plans advocates the use of objectives in the appraisal process. The identification of objectives forms the basis for the appraisal. It provides the starting point for ensuring that both the SEA/SA and sustainability issues are at the heart of and are fully integrated into the NP.

6.4. In order to facilitate legibility and ease of understanding and use, the sustainability objectives and criteria have been set out in the form of an Appraisal Framework, outlined below. The objectives listed are generally based upon those outlined in the Ashford Core Strategy Sustainability Appraisal Report but they have been amended and adapted to reflect the more locally specific baseline information and key issues highlighted in Sections 4 and 5 of this report for Bethersden.

Sustainability Framework

Table 2: Sustainability Framework for Bethersden Neighbourhood Plan Sites (based on ABC Core Strategy/Local Plan SA Frameworks)

Sustainability Framework					
Objective	Criteria	Indicators	Targets	Predicted effect	Comments / Mitigation
Conservation and enhancement of the historic environment and built heritage of the Parish	Protect, maintain and enhance the historic environment and setting – with particular reference to the open rural character of the Conservation Area, historic streets/routes and all listed buildings	Maintain key views of key heritage assets amid complementary settings.	Enhance appreciation of key assets within their spatial contexts.		
To ensure that development responds appropriately to and enhances landscape/ townscape character, quality and topography	Conserve and enhance the character and quality of open spaces, rural vistas and character, maintaining and strengthening local distinctiveness and sense of place. Improve footpaths and routes through, and views of the historic settlement.	Continued appreciation of the rural and agricultural heritage of this settlement. Increased number of routes within and beyond the historic core.	Maintenance and enhancement of historic form, along with enhanced opportunity for biodiversity.		
Appraisal Scale					
++	Significant positive effect	+	Positive effect		
0	Neutral (no effect)	?	Effect uncertain		
-	Negative effect	--	Significant negative effect		

Predicting and evaluating significant effects

6.5. The sustainability objectives outlined in Table 1 will be used to predict and evaluate the social, environmental and economic effects of options being considered in the neighbourhood plan, and this will form a key part of the Sustainability Appraisal Report of the plan. The methodology for the prediction and evaluation of effects will be outlined in that report.

7. Stage A5 – Consultation requirements

7.1. In accordance with the requirements of Sustainability Appraisal, the ‘statutory consultation bodies’, will be consulted on the scope and level of detail contained within this report. These bodies are:

- Historic England
- Natural England
- Environment Agency

7.2. This report will also be made available to other interested stakeholders and local residents who may be able to provide additional important local information that should be incorporated into this report. It is desirable and recommended to consult other parties who are involved with or likely to be affected by the Neighbourhood Plan.

7.3. Apart from the regular Steering Group meetings, there have been regular ongoing discussions with specific individuals, landowners, local employers, and community groups so as to ensure that it is local residents and their interests that are being taken into account when preparing this plan. To date the following other community consultation exercises have been undertaken:

- Proposal for Neighbourhood Plan presented at Church Fete, Aug 2013
- Public survey January 2014, presented at public meeting on 15 Feb 2014
- Public data displays and consultations: Aug – Sep 2014; Jan 2015
- Working groups focused on four key chapters as follows:
 - Orange – Foreword, Introduction and Strategic Approach
 - Green – Rural environment
 - Red – Local facilities and housing
 - Blue – Local economy, communications and transport
- Regulation 14 Consultation on the Neighbourhood Plan: 10 Aug – 18 Sep 2015

7.4. Comments received from all interested parties will be taken into account when writing the final Sustainability Appraisal.

8. Next steps

8.1. As the draft neighbourhood plan develops, the information contained within this scoping report will inform the assessment of options, as described in Section 2. A

Sustainability Appraisal Report will then be published alongside future drafts of the neighbourhood plan for public consultation.

Comments made on the Screening Opinion

Statutory Body	Comments Received
<p>Environment Agency Comment received 17th October 2014</p>	<p>Thank you for consulting us on the above. We agree with the conclusion that an SEA is not required. We would like the following comments noted.</p> <p>We note and welcome the objectives stated in section 2.4 and, in particular, the intention, within the plan, to protect “the rural environment and local distinctiveness”.</p> <p>As part of the River Beult’s upper reaches flow through the Neighbourhood Plan area, it is hoped that, in future, actions to deliver the objectives will include work to protect and enhance this important Water Framework Directive (WFD) water body which, further downstream, is designated as a Site of Special Scientific Interest.</p> <p>We would be interested in working with residents of Bethersden to help ensure any development proposed is in the most appropriate location and also to help deliver WFD measures to improve the river, as specified in the River Basin Management Plan that help achieve their objectives.</p>
<p>Natural England Comment received 17th October 2014</p>	<p>Thank you for consulting Natural England on the Bethersden Neighbourhood Plan SEA and HRA screening report.</p> <p>Subject to the scale of development in the NP broadly according with the Ashford Plan, and based on your Screening Report, I am of the view that an SEA and HRA will not be needed for the NP.</p>
<p>Historic England</p>	<p>No comments received</p>