

## Aldington and Bonnington Neighbourhood Plan

### Responses to Independent Examiner's Initial Comments

Prepared by the Aldington and Bonnington Neighbourhood Plan Steering Group

20 March 2024

This note has been prepared by the Steering Group (SG) for the Aldington and Bonnington Neighbourhood Plan (ABNP). We are grateful for the opportunity to provide further clarification on the points raised below.

#### **Question 1: Re: Policy AB1 (Green and Blue Infrastructure and Delivering Biodiversity Net Gain) (Page 21)**

I have noted the Borough Council's representations concerning this draft Policy, and in particular the aim (in criteria A and B) of delivering a measurable Biodiversity Net Gain of at least 20%, where possible. In my assessment, the requirement to demonstrate a measurable Biodiversity Net Gain of at least 20% significantly exceeds the national policy requirement.

In my assessment, the Policy will require modifications to have due regard to the relevant national Planning Practice Guidance (PPG<sup>1</sup>) (<https://www.gov.uk/guidance/biodiversity-net-gain>) as published on 14 February 2024.

Furthermore, I consider that, as drafted, there are inconsistencies between criteria A and B in the Policy which could lead to difficulties in interpreting the precise requirements of the Policy for users of the Plan.

I consider that criteria A and B can be satisfactorily consolidated into a single criterion, which reflects national PPG, and I therefore invite the **Qualifying Body** to consider this matter, taking into account the Borough Council's representations, and to provide me with a Note on possible revised text for this Policy, that I may consider as a proposed modification.

Response from the SG: We would respectfully request the following revised text in relation to Clauses A and B (to be merged):

#### **POLICY AB1: GREEN AND BLUE INFRASTRUCTURE AND DELIVERING BIODIVERSITY NET GAIN**

- A. Proposals should be designed to create, conserve, enhance and manage green and blue spaces. **They should** ~~and~~ connect chains of green and blue infrastructure, as identified on the Policies Maps, with the aim of delivering a measurable biodiversity net gain of ~~at least~~ 20%, where possible, but at a minimum, a net gain ~~in excess of~~ **at least** 10% ~~for wildlife~~.
- B. ~~Proposals for development must be supported by a biodiversity appraisal, which must demonstrate how negative impacts would be avoided and/or minimised and biodiversity net gain achieved. The appraisal should demonstrate that where significant harm to biodiversity cannot be avoided, proposed development and other changes should adequately mitigate or, as a last resort, compensate for the harm. A~~ **The** measurable biodiversity net gain of at least 20% ~~(where possible)~~ must be demonstrated by utilising the **current** Defra biodiversity metric ~~(or as amended)~~. Where this is not demonstrated, permission for planning or for change should be refused unless other material planning considerations **demonstrate outweigh** the need for development.

---

<sup>1</sup> PPG Reference ID: 74-006-20240214.

Therefore the new Clause A would be:

**A. Proposals should be designed to create, conserve, enhance and manage green and blue spaces. They should connect chains of green and blue infrastructure, as identified on the Policies Maps, with the aim of delivering a measurable biodiversity net gain of 20%, where possible, but at a minimum, a net gain of at least 10%. The measurable biodiversity net gain must be demonstrated by utilising the current Defra biodiversity metric. Where this is not demonstrated, permission for planning or for change should be refused unless other material planning considerations demonstrate the need for development.**

**Question 2: Re. Policy AB3 (Local Green Space) (Page 34)**

I have noted the representations submitted by DHA Planning Ltd. on behalf of TG Designer Homes concerning the proposed designation of the site known as 'Calleywell Field' (Site No. 5) as a Local Green Space.

I note from the Consultation Statement (at Page 30) that representations were submitted at the Regulation 14 consultation stage by Hobbs Parker Property Consultants LLP on behalf of the owners of this site and that (at Page 35) "*Calleywell Field and Wood is retained, but reduced to a 10m strip, which appear more appropriate in terms of its recreational use.*", as the Steering Team's response to representations.

I therefore request that the **Qualifying Body** provide me with a copy of the representations concerning the 'Calleywell Field' site that were submitted at the Regulation 14 consultation stage, in order that I may consider the justification for the proposed Local Green Space, as now defined in the draft Plan, in greater detail.

I confirm that I will visit each of the proposed Local Green Space sites during the course of my site visit.

Response from the SG: A copy of the email is shown below:

**From:** Hobbs Parker  
**Sent:** Sunday, July 9, 2023 10:39 am  
**To:** Planning Policy email  
**Subject:** Comment on Aldington & Bonnington Neighbourhood Plan

To Ashford Planning Policy and Cllr. Harman,

Please find below my comments submitted on behalf of the landowner via the on-line survey. I was unable to locate a Neighbourhood Plan e-mail address so for completeness this is marked for the attention of Ashford's Planning Policy Department and Cllr. Linda Harman, particularly since I was unable to save a copy of the survey in order to keep a record.

Please add any comments you have on any of the policies. Please indicate which policy you are commenting on by quoting the Policy number.

Policy AB3 and Appendix A - Local Green Spaces

This Policy is at odds with Policy COM2 of the Ashford Local Plan (to 2030). Site Number 5 'Calleywell field and wood' appears to have been designated for visual amenity only. This fails the criteria in the

Local Plan which the Neighbourhood Plan is required to be in conformity with. Furthermore, it is stated that "both are used extensively for walkers" - whilst it is recognised that there is a short length of an existing Public Right of Way (PROW-AE446) there is no need for a connection to AE445 since a safe route exists along Bank Road/Roman Road. In fact, that would serve to 'cut-off' the route via the Village Shop/Post Office which should be encouraged in order to support the local services and facilities within the village. The proposed rectangular designation is both unnecessary and unjustified and cannot fulfil the function of "informal greenspace" as there is no public access to the rectangle except for on the PROW. The Parish Council will be aware of the refused planning application on a larger parcel of land, and it is considered that best practice would be to engage with the very willing developer to come to an agreement of provision of informal greenspace within any subsequent planning application which can be accessible to all. The Neighbourhood Plan makes reference to the PROW being well used by walkers, however it is part of an actively farmed field, it is cropped and therefore ploughed each year and is not accessible to all (such as pushchair users, cyclists, disabled persons or horses). As part of any discussion with the developer it is hoped that a better space, which promotes inclusivity, could be created as part of a revised scheme. The developer would be keen to have a discussion with both the Parish Council, and Ashford Borough Council, to work with all parties as part of a revised application on the larger site.

Paragraph 102 of the NPPF is cited in the draft Neighbourhood Plan, however paragraph 101 states that "Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes". The wider site has been the subject of a refused planning application and it is intended that a resubmission will take place in the future. The unusual shape of the proposed designation, with no evidence aside from the "nice view", would appear to be designed to frustrate any future development coming forward, development which would be considered as sustainable due to its proximity to the village core and the local services and facilities which, in order to survive, will need on-going new development to encourage local spend and remain open.

## 2. Are there any other comments you wish to make on anything else relating to the Neighbourhood Plan. Please use the space below.

The wider land, land to the West of Calleywell Lane, Aldington, should be allocated for housing development within the Neighbourhood Plan for a modest scheme to take into account the character and appearance of the area and the nearby heritage assets since development of this site was acknowledged by the Inspector to broadly comply with Policies SP1, SP2 and HOU5 of the Local Plan with regard to scale and accessibility to facilities and services.

Kind regards,

Associate Director

**Hobbs Parker Property Consultants LLP**

W: <http://www.hobbsparker.co.uk/property-consultants/>

Chartered Surveyors - Planning Consultants - Land Agents

Part of the Hobbs Parker Group, serving the people of the South East since 1850.



**Hobbs Parker Group Internal Disclaimer (HP-SRV-011):**

The use of this email system is governed by the policies in the Hobbs Parker Group Company Handbook.

### Question 3: Re: Policy AB6 (Residential Windfall Development)

I have noted the Borough Council's representations concerning the criteria that are set out in clause B of this draft Policy, which I also note repeat some of the concerns that were expressed by the Borough Council at the Regulation 14 consultation stage.

Before I consider this matter in greater detail, can the **Qualifying Body** please confirm that Figure 13 correctly shows the location of all bus stops within the village of Aldington and on the principal roads leading out of the village?

#### Response from the SG:

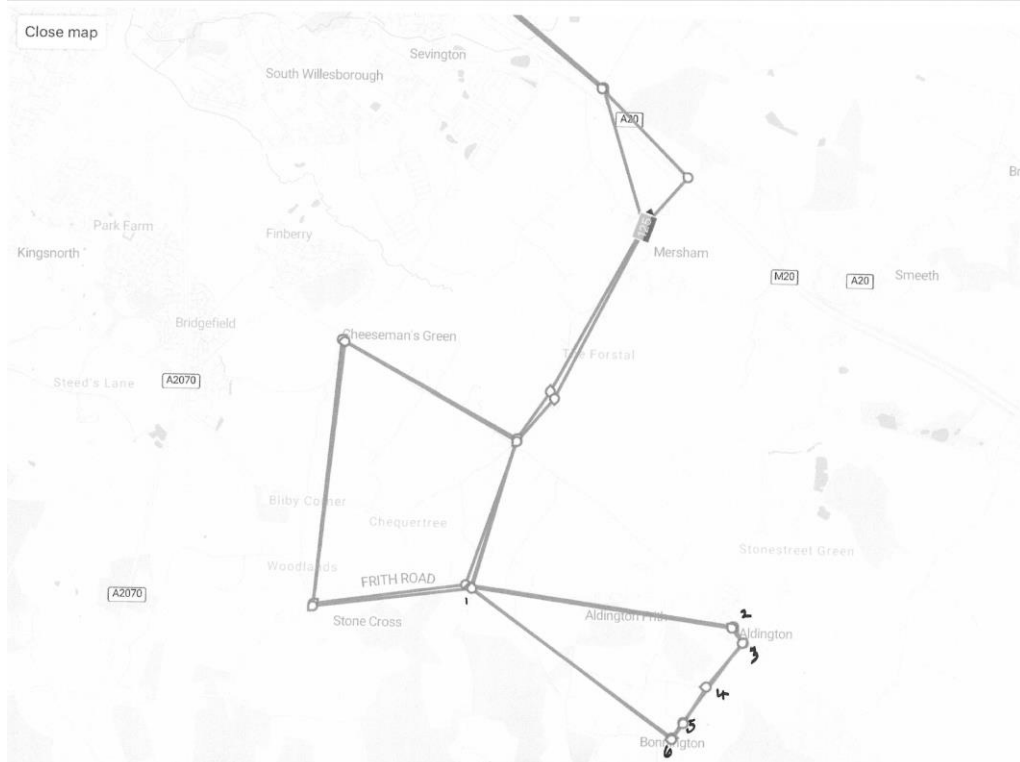
We currently have only one bus route: number 125 - Ashford - Aldington – Ashford.

There are 6 bus stops (see map below), all being on both sides of the road, except bus stop 4, which is only on one side of the road.

Bus stops:

1. Aldington Frith, opp & adjacent to Priory Road
2. Aldington, opp & adj Fire Station
3. Aldington opp and adj Walnut Tree Inn
4. Aldington, opp Poulton Wood
5. Aldington Meadow - opp & adj Kiln Road houses
6. Aldington Easton's Corner app & adj to Boat lane junction

Here is a map showing the bus stops, which has been supplied by the operator:



Furthermore, can the **Qualifying Body** also please confirm whether the term “*small to medium-scale development*” should be interpreted as being for sites no larger than 1.0 hectare, as assumed by the Borough Council in its representations?

Response from the SG: Yes, this is correct.

#### **Question 4: Policy AB12 (Sustainable Travel) (Page 79)**

Can the **Qualifying Body** please confirm that the reference to Figure 20 in clause B of this draft Policy should be to Figure 19?

Response from the SG: Yes, this is correct. The policy should refer to Figure 19.

#### **Question 5: Re. Paragraph 2.7 (Page 15)**

I have noted Kent County Council’s representations on the draft Plan, which include the suggestion that paragraph 2.7 of Section 2 (About Aldington and Bonnington) contains some inaccuracies and is confusing.

I therefore request that the **Qualifying Body** review the County Council’s representations, and specifically Appendix A to those representations, and provide me with a Note setting out any necessary revisions to paragraph 2.7, and if appropriate to other parts of Section 2, that I may consider as a modification to the Plan.

Response from the SG:

Submitted text:

2.7 That Aldington and the surrounding area was a Roman site during their occupation of Britain is beyond doubt, making the area one of great archaeological potential. Indeed, some authorities consider the area to have been Caesar’s landing site in 55 BC and most agree that the area was the landing site of the 3rd Roman invasion under Plautius in AD 43. Nearby Lympne, for many centuries part of Aldington, was an extremely important site, with a major fort (Strutfall Castle); a large Roman port, Portus Lemanis, which was the home of the British Roman Fleet; the Roman road of Stone Street leading via Canterbury and Watling Street to London; and the Roman Road through Aldington to Maidstone. It is logical to assume, therefore, that the Romans overflowed into Aldington from their major base of Lympne.

Suggested amended text:

2.7 Important routes run through Aldington, north-west to Ashford and west-east along the hills flanking the north of Romney Marsh, giving the area a very long history that development over the years has variously exposed. A collection of Mesolithic flints (c. 10,000 – 4,000 BC) including scrapers, blades and points is known from Knoll Farm. Prehistoric pits and a hearth were also found at HMP Aldington in 2000. Several examples of Bronze Age and Iron Age metalwork have been found and it is almost certain that other prehistoric sites live undiscovered in the area. There have been numerous Roman discoveries in the area as Aldington lies close Portus Lemanis, the Roman fort and port at Lympne, and was on the main route connecting the area with the iron producing areas of the

Weald but also the Roman road connecting Portus Lemanis with north Kent. The original Roman road itself may have been detected in excavation in 2005 during cabling works close to Cobb's Hall. The most important Roman site is perhaps the probable Roman burial barrow at Aldington Knoll. This Scheduled Monument consisted of an earthen barrow that contained at least one burial. A probable mixed inhumation/cremation Roman cemetery was found at Postling Green in 1914 and Roman flue tiles and bricks were found in April 1935 and 1936 during construction of a tennis court at New Haytors. Fragments of brick, Romano-British in date, were found at Marwood Farm in the 1960s. Finally, cropmarks of possible Roman walled cemetery have been seen from Forge Hill, Aldington. Taken together, these sites show the importance of the area in the Roman period and the considerable potential for further discoveries. For more recent periods, there is of course much more information. The area contains almost 30 historic buildings dating to the medieval period including Grade I listed buildings at St Martin's and St Rumwold's churches. Other buildings include farms and barns, high status buildings and cottages. Archaeological sites include the former site of St Leonard's church, the church at Hurst, ruined apparently by fire since 1530. The most imposing monument from the post medieval period is the Royal Military Canal, constructed between 1804 and 1809, a scheduled monument and still a highly visible marker in the landscape.

### **Final Point of clarification**

As a final point, the SG would like it to be noted that a map showing the "Point-To-Point" local green space, which featured in the Regulation 14 Version Plan but was removed for the Submission Plan, has been inadvertently left in the Local Green Space appendix. This should be removed before the Plan is finalised.

We are grateful for the opportunity to provide further clarification on this questions and points.

Linda Harman

Chair of the Aldington and Bonnington Neighbourhood Plan Steering Group