



Simon Cole  
Head of Planning Policy  
Ashford Borough Council  
Civic Centre  
Tannery Lane  
Ashford  
Kent  
TN 23 1PL

cc Colin Tearle Locum Clerk, Bethersden PC

3 July 2018

Dear Mr Cole

**Independent Examination of Bethersden Neighbourhood Development Plan; Response to Position letter**

Thank you for your letter dated 28<sup>th</sup> June 2018 which addressed the points raised in my "Summary of Significant Issues" dated 10<sup>th</sup> April 2018.

I am satisfied that the actions you have outlined are a satisfactory way of addressing the issues. I am therefore willing to suspend the examination to allow the revision of the necessary documents and further consultation to be undertaken in accordance with regulation 16 of the Neighbourhood Planning Regulations in accordance with the timescale you have outlined, subject to the following points:

1. Your letter does not address the issue raised in part b) of section 4 of the "summary of Significant Issues). I referred there to Planning Practice Guidance which does not allow tariff style contributions to affordable housing on sites of 10 or less dwellings or more than 1000 sq m gross internal area unless they are in a designated rural area (Reference ID23b-031-20161116). I understand that Bethersden is not a designated rural area in this context. As two of the three sites propose an upper limit of 10 dwellings this would significantly limit the potential of these sites to deliver affordable housing. In addition to addressing this issue there is a need to clarify the intentions of Policy H6. As currently worded the second sentence is not consistent with the first. With regards to Local Needs Housing, I note that the lettings policy referred to was not in place when my examination of the Plan started.
2. I am not satisfied that the treatment of heritage assets in the site evaluation and the SEA is entirely a "process" issue. The lack of clarity in the way these matters have been addressed means that it has not been demonstrated that the allocations have been adequately shown to contribute to sustainable development. That is a matter of substance as well as process.

3. I have copied my response to an email from Parish Councillor Ruth Orchard to you. While it was inappropriate for this e mail to be sent direct to me and not to either Ashford Borough Council of the Parish Council, the point it raises regarding the approval of any submission documents by the full Parish Council is very important.

3. The actions outlined do not guarantee that the resubmitted elements of the Plan will enable it to meet the basic conditions. I must reserve my position on this until the documents have been submitted and they have been subject to consultation. Until then there is also the possibility that I will find it necessary to arrange a hearing.

I will resume my examination when the regulation 16 consultation on the revised documents is complete.

Yours Sincerely

*Richard High*

Richard High BA MA MRTPI  
Independent Examiner