



BRIDGE NEIGHBOURHOOD PLAN – CONSULTATION DRAFT 4 - MAY 2016

Thank you for consulting the Kent Downs AONB Unit on the above document. The following comments are from the Kent Downs AONB Unit and as such are at an officer level and do not necessarily represent the comments of the whole AONB partnership.

Background and context:

National and Local planning policies are very clear that highest priority should be given to the conservation and enhancement of Areas of Outstanding Natural Beauty.

The NPPF confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status (Paras. 14 footnote 9, 115 and 116).

The status of AONBs has been enhanced through measures introduced in the Countryside and Rights of Way (CROW) Act 2000, which gave greater support to their planning and management. The statutory duties state that in exercising or performing any functions in relation to, or so as to affect, land' in these areas, relevant authorities "shall have regard" to their purposes (Page 3 of DEFRA guidance). The Act requires a management plan to be produced, and accordingly the first Kent Downs AONB Management Plan was published in April 2004.

The second revision management plan (20014- 2019) has been formally adopted by all the local authorities of the Kent Downs. The management plan may be viewed on our web site:

<http://www.kentdowns.org.uk/guidance-management-and-advice/management-plan>

Relationship of the Management Plan with production of Local Authority Local and Neighbourhood Plans.

Under the CROW Act the AONB Management Plan must 'formulate the (Local Authority) policies for the management of the AONB and for carrying out their functions in relation to it'. The policies of the Kent Downs AONB Management Plan are therefore the adopted policies of all the Local Authorities in the Kent Downs. Whilst these policies should not be repeated in the Local Authority Local Plans and Neighbourhood Plans, this relationship should be clear. Any Kent Downs AONB responses on consultations on local plans and neighbourhood plans will reflect the policies of the Kent Downs AONB Management Plan and other Kent Downs AONB guidance as set out below.

Other Kent Downs AONB Guidance:

- **Kent Downs Landscape Design Handbook** - Design guidance based on the 13 landscape character areas in the Kent Downs. Guidance on fencing, hedges, planting, gateways etc. to help in the conservation and enhancement of all corners of the AONB.

- **Kent Downs Renewable Energy Position Statement** - The purpose of this statement is to provide a clearly articulated position for the Kent Downs AONB partnership with regards to renewable energy technologies. It recognises that each Local Planning Authority must balance the impact of proposals for renewables on the AONB with all the other material planning considerations.
- **Kent Rural Advice Service Farm Diversification Toolkit** - Guidance on taking an integrated whole farm approach to farm developments leading to sound diversification projects that benefit the Kent Downs.
- **Kent Downs Land Manager's Pack** - Detailed guidance on practical land management from how to plant a hedge to creating ponds and enhancing chalk grassland.
- **Rural Streets and Lanes A Design Handbook** - Guidance on the management and design of rural lanes and streets that takes the unique character of the Kent Downs into account. This document discusses the principle of shared space and uses examples from around the UK and Europe. The Rural Streets and Lanes Design Handbook has been adopted as policy by Kent County Council.
- **Good Practice Horse Pasture Management** - National guidance providing information on equine development covering grassland management, fencing, trees and hedges, waste management and basic planning information.
- **Kent Farmstead Guidance and Kent Downs Farmstead Guidance** - Guidance on the conservation, enhancement and development change of heritage farmsteads in the Kent Downs based on English Heritage's Kent and National Character Area Farmstead Statements. Includes an Assessment method and Design Guidance.

Bridge Neighbourhood Plan

Our specific comments on the draft plan are set out below. We would welcome the acknowledgement of the importance of the Kent Downs AONB and its setting within the document. As well as setting out policy for AONBs and its setting, it is good practice for local and neighbourhood plans to define the special qualities of the area and it would be appropriate for this to be included within the background section of the Neighbourhood Plan.

Policy A2

Support the intention behind this policy but concerned that it is not caveated in anyway so appears to offer support for business premises of any scale or design which may fail to conserve or enhance the Kent Downs AONB. Recommend criteria are added to ensure that proposals are of an appropriate design and scale for the village.

Policy C1

Reference to the Kent Downs Management Plan is welcomed. In addition to the Management Plan, the AONB Unit also produces other guidance documents that provide design advice on a variety of topics including the Landscape Design Handbook, Managing Land for Horses, Farmstead Guidance and Rural Street and Lanes – A Design handbook. While the Management Plan provides overarching land management guidance, it depends on this supporting guidance to provide detailed criteria for development and reference to this should also be included in the Neighbourhood Plan to assist in

meeting the objectives of the NPPF and 2000 CROW Act. By using the term 'and its supporting guidance' this covers any new guidance, such as the proposed Kent Downs Rural Buildings Design Guidance, that may become available over the lifetime of the Local Plan.

"c) Comply with guidance in the Conservation area Appraisals and Management plans, the Kent Downs AONB Management Plan and its associated Design Guidance;"

Policy C2

While Policy C2 relates to the provision of new affordable housing, it would be beneficial for the Neighbourhood Plan to include a policy requiring an appropriate level of affordable housing to be incorporated as part of other new housing developments in the village. Housing prices have continued to rise well above the national average in some parts of the AONB and there is considerable demand for affordable housing in many parishes in the AONB. The Unit is keen to ensure that affordable housing is available for those with proven local needs or workers whose activities directly contribute to the purposes of the AONB designation provided that this is well designed, of sustainable construction and appropriately located. Providing affordable housing within proposed new developments in the village would potentially reduce the need for the release of 'exception' sites which could potentially have greater impact on the AONB.

Policy C3 Conyngham Lane

The site lies outside of the village confines and development here would intrude into open countryside and has the potential to harm the Kent Downs AONB. The site comprises rising land and access to the site is likely to require removal of hedgerows/trees along the High Street, opening up views into the site. Have alternative sites that would have less harm on the nationally protected landscape been examined?

If the Neighbourhood Plan does include this allocation, a carefully worded policy would be required to ensure appropriate mitigation and that harm to the AONB is minimised.

Policy C5

Support this policy.

Policy F3

As well as ensuring new development incorporate provision of new green spaces, given the village's location within the Kent Downs AONB, we would also advocate a requirement for new development being required to retain existing important landscape features as to contribute towards landscape enhancement. It would be worthwhile for reference to be made to landscaping being designed to conserve and enhance views from the AONB and to comprise native species.

Policy F4.

The Kent Downs AONB boundary does not extend to the south side of Canterbury; it extends to the north only as far as Station Road. It would therefore seem inappropriate to refer to this in the context of development on the south side of Canterbury.

It would however be appropriate to include a policy that provides for the conservation and enhancement of the Kent Downs AONB, given that the majority of the Parish lies within this nationally protected landscape.

Project F2

Concerned that this seems to provide unqualified support to any new development (of any scale/location etc.), providing it allocates land to certain community uses. Consider this should be qualified, for example by inclusion of wording along the lines of “providing this conforms with other policies of this Neighbourhood Plan).

Policies G1, G2 and G3

The intention behind these policies is supported, but concerned that the policy wording might not achieve the desired objectives. Planning applications for new development in Bridge Parish will be judged against these policies and it is therefore important that they are framed in such a way.

The requirement for design needing to respect existing character is welcomed, however it is considered that this needs to be emphasised more strongly; the conservation and enhancement of the natural and scenic beauty of the Kent Downs is dependent on local character, qualities and distinctiveness being maintained. It is therefore requested that reference is made to new development be required to conserve local distinctiveness. We would also like to see reference to materials being chosen to limit the visual impact on the AONB.

At present there is no mention of lighting in the Neighbourhood Plan, the importance of the conservation of dark night skies is recognised in the NPPF (para 125) which states that planning policies should limit the impact of light pollution on intrinsically dark landscapes. It is also an element of tranquillity that is supported by the Kent Downs AONB Management Plan (policy SD7).

It is requested that reference is made to the need to retain dark night skies and that new external lighting will not be acceptable as part of new developments except in exceptional circumstances.