

Representation Number	4497409
Name	Sport England (Planning)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p>

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing

sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8:

<https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section:

<https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance:

<https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Representation Number	15262049
Name	Jane Hart
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	All
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	I support the plan

Representation Number	4476705
Name	Christopher Morley
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	<p>P44 east-west strategic corridor should be based on Footpath AE210</p> <p>p56 felt it was important to be able to walk from their home to the countryside</p> <p>p12 the Parishes are anticipating much slower housing growth following the significant change over the past 20 years.</p> <p>p60 assist walking and cycling alongside traffic mitigation measures to reduce the traffic impact on local roads including Sandyhurst Lane and access to the A251 and A20</p>
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>I welcome and support this document which is the result of extensive discussion with residents and neighbouring organisations. In particular:</p> <p>I support (p44) the ambition that "an east-west strategic corridor should be based on Footpath AE210" and (p56) "felt it was important to be able to walk from their home to the countryside", and would look to the approach of strategic footpaths at the urban edge linking to adjacent countryside being adopted as a model (too often, footpaths at the urban edge are lost in a maze of housing, and are not attractive places to walk)</p> <p>I note (p12) "the Parishes are anticipating much slower housing growth following the significant change over the past 20 years" and am concerned that this is unlikely to be the case.</p>

Representation Number	29874369
Name	Bryan Hall
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	<p>Page 11. Between 2001 and 2011 some 540 dwellings were added to the housing stock of the Neighbourhood Plan area, primarily in the Goat Lees.</p> <p>Delete this next bit as it contradicts the first part of the sentence!</p> <p>area which was completed 20 years ago.</p>
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>I am not objecting just making a suggestion to change some wording.</p> <p>I am fully supportive of the plan</p>

Representation Number	14537217
Name	David Porter
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Object
What part of the document does your comment relate to?	Page 11, "Housing and Business", second paragraph.
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	The paragraph does not make sense. If, as stated, the Goat Lees area was completed 20 years ago, ie in 2000, then it cannot have contributed to the 540 dwellings added between 2001 and 2011. Something is wrong with the statements in this paragraph; they are mutually incompatible.

Representation Number	12357729
Name	Kent Downs AONB Unit (Katie Miller)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	Whole document.
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	We welcome the acknowledgement of the importance of the Kent Downs AONB and its setting within the document, along with references to the Kent Downs AONB Management Plan and support this well considered and drafted Neighbourhood Plan.

Representation Number	9532321
Name	Ben Hussell
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Omission
What part of the document does your comment relate to?	Page 27, Policy BAE NP6. Small Scale development within Boughton Lees.
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	I'm surprised that small scale infilling, redevelopment and conversions are to be permitted. Particularly so given the Parish Council's recent objections to planning applications: 20/00576/AS, 11/01298/AS, 14/1207/AS, which are all infills or conversions of a different sort. Why does the PC oppose these but support infilling in the new plan? In relation to 11/01298/AS, ABC Planning opposed this development too.

Representation Number	9532001
Name	carol bunker
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	All of the summary
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>I fully support this plan. Ours are mixed parishes with a geographically small area of intense development (about to become much larger) and a far larger rural area, the greater part of which is AONB land.</p> <p>I believe the plan addresses the future needs of both areas within the parishes thoughtfully and even-handedly.</p>

Representation Number	30262625
Name	Nigel Bunker
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	Policy BAE NP2
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Policy 2: There has been apprehension among residents that the designation in the Local Plan of Sandyacres as a Sports Hub might lead to developments that could detract from its open character, and popular use of it as an area for walking. I see the wording of Policy 2 as particularly helpful on this point.</p> <p>General: I was one of very many local people who participated in producing this plan, so clearly I'm predisposed to take a positive view. For all that, I believe that the plan is notably successful in balancing the need for new development and the need to foster the beauty and character of the area,</p>

Representation Number	4502049
Name	Westwell Parish Council (Sue Wood)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	Pages 12, 18, 28, 31, 35, 38, 41, 46,
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Comments on the Boughton Aluph and Eastwell Neighbourhood Plan Oct 2020</p> <p>Westwell is the adjacent parish to the west. We have a smaller population but an equally strong commitment to the character and community of our parish area. Having made a submission to the earlier regulation 14 consultation we are very supportive of this next stage and congratulate Boughton Aluph and Eastwell parish council and the neighbourhood planning steering group on this contribution to planning in this part of the Ashford borough. We share a particular interest in the AONB designated area and its setting, the character and management of Sandyhurst Lane, and the long-term careful development of Eureka park.</p> <p>Comments</p> <p>Page 12: Westwell supports the Vision expressed in Section 3, in particular that of maintaining rural character at the urban edge of Ashford.</p> <p>Having regard to the conservation and enhancement of the landscape and scenic beauty of the AONB that washes over much of both parishes is a primary consideration for the plan. The AONB designation and the setting of the AONB together set the rural and urban planning context for this neighbourhood plan and the wider area.</p> <p>Page 18 Map 3 identifies 5 distinctive character areas for the south west part of the BA&E Parish , no 1 being Sandyhurst Lane. Westwell parish welcomes this setting out of the rural edge and landscape character of the Lane, which was reinforced by the recent appeal</p>

[APP/E2205/W/19/3220880]. We therefore support policy BAE NP1 All of the distinctive character areas identified will inform and assist planning in the area.

Page 28 sets out the Green spaces policy BAE NP2. While many of the green spaces listed may seem obvious, Westwell supports the policy and the careful identification and mapping to ensure these green spaces are not taken for granted and are material considerations for planning. They are of value as space and for the setting and character they provide.

Page 31 maps the landscape character areas of this part of the AONB , all of which are helpful, although we note that the dominant characteristic is the fact that this is all an area of AONB designation for which the duty to have regard to its landscape and scenic beauty applies. The implication of the open character and long views is that the AONB setting also becomes very important.

Page 35 provides a very helpful map (Map15) of the Eastwell Farmlands landscape character area that is one of the distinctive landscape areas in the immediate setting of the AONB. It was defined in the Engelback Study (2005) which was part of the evidence base for the previous (2008) Ashford local plan. That study continues to be relevant and it is therefore useful to see it referenced in this plan. The Eastwell Farmlands area extends into Westwell parish to the west (the green dotted line on Map 15). It should also be noted that the area is wrapped around by AONB to the west, north and east, and it may be appropriate to indicate the AONB boundary on this map also. Westwell parish also sees opportunities to enhance the biodiversity particularly of the ancient woodland areas and in particular of Tile Lodge Wood, already designated as a local wildlife area . Tile Lodge Wood adjoins Westwell parish

and it might, through joint action, have potential to become an SSSI.

Page 38 lists important public views. Westwell supports this approach and the views listed . We assume that the further work as the Eureka plans develop will also identify and list important views for that development – there is one shown in the photograph on page 45 and indicated on map 20 on page 46, but as this already exists and should be retained it could usefully be added to the list on page 38 in this Plan: the view from the Eureka Place local centre to Westwell beacon in the AONB confirms the relevance of AONB setting and the importance of achieving good design that is fitting for AONB setting - and on which the AONB Unit has developed well established policy practice . To list this as an important view now would be helpful.

Page 41. It follows for the above comments that Westwell parish supports policy BAE NP3. We suggest the reference list of views on page 38 includes the views already identified in the map on page 46. And Westwell suggests there may be specific opportunities for biodiversity enhancement in the locally designated Local wildlife area of Tile Lodge Wood as well as the ancient woodland .

Page 46 shows the BA&E NP framework for the Eureka development in terms of footpaths , green infrastructure and views, all of which is welcome . It may be worth noting that there is already joint working in place between the parishes of Kennington, Westwell and Boughton Aluph because all are directly involved in and impacted by whatever proposals and development happen on this site, which is already partially developed with premium commercial development, and a well used local centre and a much used and appreciated green space parkland around the large fishing lake. The planning of the whole area and

	<p>potential to deliver an absorbable amount of well designed housing and not to abandon further commercial employment provision will be key issues as the plans develop. Given the ownership of the site (Trinity College Cambridge) there is the opportunity to continue to take a long-term view of the site and not to “fill it full of houses” for a shorter-term return . The BA&E NP sets a very helpful framework to articulate a vision for distinctive character areas as a design guide within the master plan and to work together as stake- holder group with Quadrant and DHA as Trinity College’s developer to see that implemented. These may not be points to add in the NP but they are relevant to what happens when the NP is accepted through its referendum and the next steps considered.</p> <p>Thank you for the opportunity to comment on this version of the Neighbourhood Plan</p>
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Representation Number	11988993
Name	Sandyhurst Lane Residents' Association (David Porter)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>The Sandyhurst Lane Residents' Association (SLRA) appreciates the opportunity to comment on the Boughton Aluph & Eastwell Parishes Neighbourhood Plan - Regulation 15, September 2020 consultation.</p> <p>Sandyhurst Lane Residents' Association has been active for over thirty years representing the collective interests of the residents of Sandyhurst Lane and all adjacent roads, which constitute its neighbourhood of 345 dwellings. The mission statement of the Association is "Protecting the rural character of Sandyhurst Lane and the adjoining area".</p> <p>The SLRA area represents properties solely within by the rural Downs West borough ward with 70% of its properties falling under the Westwell Parish Council and the balance of 30% being in the Boughton Aluph and Eastwell wards of the Boughton Aluph and Eastwell (BA&E) Parish Council.</p> <p>As a result the SLRA believes it has a responsibility to its members to comment on this Neighbourhood Plan which, whilst it sets out the residents' vision for the Boughton Aluph & Eastwell parish, will have an impact on the quality of life, environment and character of the wider SLRA areas.</p> <p>In fulfilling this responsibility the SLRA has been actively supportive during the development of the Neighbourhood Plan (NP) and has regularly submitted its</p>

views on those issues which we believe will impact on some, or all of our residents, or which we believe will influence or be detrimental to the rural character of the area we seek to preserve.

We now congratulate the BA&E Parish Council and its neighbourhood planning team on the production of a comprehensive Neighbourhood Plan which, in the most part, meets our earlier criticisms and now complements and supports our Mission Statement and vision for the future of the area.

We are therefore pleased to endorse this Neighbourhood Plan whilst indicating those detailed points we still think need addressing.

Our consultation response covers two themes of the NP, namely Environment Leisure, Wellbeing and Infrastructure
Environment

a) Whilst the Plan seeks to protect those of its areas within the AONB, the SLRA

believes this version still fails to reflect the recent Ashford Borough Council ward boundary changes which led to the separation of both the Boughton Aluph and Eastwell parish wards into the rural Downs West borough ward and

the larger (by population) Goat Lees parish ward into the new Goat Lees borough ward.

Over the Plan period the quoted 90% of the parish population in the urban Ashford area (page 10) can be expected to increase. These changes may make

retaining the rural character of the whole BA&E parish more difficult. The SLRA

believes the NP needs to recognise this demographic change by more clearly

identifying and prioritising the preservation of the existing rural areas.

RECOMMENDATION 1:

The NP should ensure its description, maps (particularly Map 3, page 18) and Policy BAE NP1 (page 21) clearly delineate the dichotomy that Boughton Aluph and Eastwell parish wards fall into both the rural Downs West and the urban Goat Lees borough wards and, as such ensure development proposals in the latter do not contravene NPPF, ABC Local Plan, AONB or other policies that safeguard the character of the rural countryside in this Neighbourhood Plan.

b) Whilst the SLRA admires the accuracy and detail in describing the characteristics of Sandyhurst Lane it still argues that the statement accompanying the photo of Sandyhurst Lane (page 30) is misleading.

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RECOMMENDATION 2:

That for clarity the text accompanying the photo on page 30 should make clear that, following the 2015 boundary realignment, it is the landscape buffer behind the properties on the south/southeast side of Sandyhurst Lane

that “forms a well-defined edge to the Ashford urban area and provides separation between the built form which forms the edge of the settlement of Ashford on one side and open countryside on the other”.

Leisure, Wellbeing and Infrastructure

The SLRA is pleased to note that, whilst the text acknowledges that future housing and business developments within the Plan area will adversely impact

on traffic on Sandyhurst Lane and surrounding roads (page 60), it fails to endorse the provision in the Ashford Local Plan permitting the development of

	<p>Policy S20 Eureka Park that there should be no vehicular (except emergency vehicles) access onto Sandyhurst Lane.</p> <p>RECOMMENDATION 3: That Policy BAE NP5 - Eureka Park Development Principles (page 46/47) should include: That no direct or indirect vehicular access should be permitted (except emergency vehicles) from the development onto Sandyhurst Lane.</p>
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Representation Number	20177633
Name	Millwood Designer Homes (David Edwards)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Object
What part of the document does your comment relate to?	Policy BAE NP3 (b)
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	We object to this policy as we consider it is unduly restrictive. This land lies outside the AONB and is thus, by its nature, of lower landscape value. Views into and out of the AONB are almost non-existent. The area is well contained and of lower landscape value, sitting sustainably on the edge of the urban area. Housing proposals in this area should be considered on a case by case basis, according to the merits of each proposal. The policy should be modified to enable this degree of flexibility and to help provide much needed housing in this highly sustainable location, close to existing shops, services, bus routes and employment opportunities.

Representation Number	20177633
Name	Millwood Designer Homes (David Edwards)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Object
What part of the document does your comment relate to?	Map 15 - Eastwell Farmlands Valued Landscape
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	The map of the Eastwell Farmlands included in the Neighbourhood Plan, together with the supporting text, is unhelpful as it includes both land within the AONB and outside it and treats it as a homogenous mass. The land shown comprises different character areas, reflected by the inclusion of the land around Eastwell Court in the AONB and the exclusion of the land adjoining Lenacre Farm from it. The map should be modified to reflect the different character and status of these two landscape areas and the lower landscape status of the land outside the AONB around Lenacre Farm.

Representation Number	20177633
Name	Millwood Designer Homes (David Edwards)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Object
What part of the document does your comment relate to?	Policy BAE NP2
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>We do not consider this policy to be entirely appropriate with respect to the boundary of the Green Space shown on Map 9 – Green space in front of Eastwell Towers (LGS4). Whilst the majority of the land to the front of Eastwell Towers may be appropriate to allocate as local Green Space, the area shown on Map 9 of the Neighbourhood Plan includes a small area of land that is within the Highway boundary.</p> <p>Allocation of this land as green space would, in our view, be inappropriate. We would request confirmation therefore that Kent County Council Highways Department has been made aware of this suggested allocation since such a designation would potentially limit the Council's ability to make junction improvements in the future (to the benefit of the local community). On this basis we would suggest that the delineation of the Green Space as shown on Map 9 should be reconsidered.</p>

Representation Number	20177633
Name	Millwood Designer Homes (David Edwards)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Object
What part of the document does your comment relate to?	BAE NP3
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Our concerns with regards to this policy centre around two main issues:</p> <ol style="list-style-type: none"> 1. Non-conformity with strategic policies of the Ashford Local Plan (particularly Policy HOU5 - Residential Windfall Development in the Countryside). 2. Non-proportionate nor robust evidence base in relation to important views and landscape designations. <p>1. Non-Conformity with Strategic Policies</p> <p>With regards to non-conformity with strategic policies, we have serious concerns regarding how the Neighbourhood Plan conforms to the Ashford Local Plan adopted in February 2019. The Ashford Local Plan is clear with regards to which policies it considers to be strategic. The Local Plan states (at paragraph 1.8): For the purposes of neighbourhood planning, the policies within this Local Plan have been assessed using guidance provided in Planning Practice Guidance (PPG) on Neighbourhood Planning (Paras 75 and 76). However, it is likely that some policies may not be 'strategic' in all NP circumstances, particularly where the policy may refer to a specific geographical area, site or landscape which is not applicable to that NP area. There is also scope for a NP to be more specific than the Local Plan in relation to some topic policies, where evidence supports this position.</p>

It is clear therefore that policies within the neighbourhood plan must conform with all policies within the Ashford Local Plan unless irrelevant due to geography. The neighbourhood plan may seek to be more specific (i.e. building upon strategic policies) only where evidence supports this position.

The creation of the landscape designation 'Eastland Farmlands' within the Neighbourhood Plan is in our view inappropriate. This element of the neighbourhood plan does not seem warranted on the basis that it provides no further specific detail to adopted policy ENV3a nor indeed the Ashford Landscape Character SPD adopted in 2011. Policy ENV3a is clear that only locally-identified 'significant landscape features' warrant consideration (not protection) and that this needs to be fully justified within a neighbourhood plan. We shall examine the evidence base underpinning this policy further below, however, for this reason alone we would argue that this element be deleted from the Neighbourhood Plan.

With regards to part d) of policy BAE NP3 which seeks to maintain distinctive views of the countryside, again we are concerned about how this policy conforms to strategic policies HOU5, SP2 and ENV3a, neither of which refer to such important views, and certainly do not require the 'maintenance' of such views. We would again suggest that the wording of the policy is amended to ensure conformity with such policies.

2. Non-Proportionate nor Robust Evidence Base

Further to our concerns regarding conformity with the Ashford Local Plan policies, we also raise concerns with the level of background evidence used to support neighbourhood plan policies and indeed the consultation process

used as justification to support such policies.

Important Views

Turning firstly to the 'important views' referenced under part d) of policy BAE NP3, the process for identifying and allocating these views is set out within the background evidence document: Important Public Views Assessment 2018. The methodology within this document notes that public engagement on the neighbourhood plan identified views, that these were then visited by Members of the Steering Group and were sifted to ensure that views were public views (and not private views). The document also notes that important views were identified in the Parish Design Statement 2003.

Tracing the approach taken by the Neighbourhood Plan steering group, the 2016 survey asked residents to provide their opinions on a number of identified important views as follows:

Firstly, we cannot see the correlation between the views consulted upon and the selected views now shown within the Neighbourhood Plan. It seems inaccurate therefore to suggest that the views identified have come from a consultation process. The methodology also suggests that views have been identified with reference to the 2003 Parish Design Statement. These do not show any resemblance to the views identified within the Neighbourhood Plan.

Parish Design Statement - Important Views

It is therefore not transparent about how important views were initially identified and the evidence base used for identifying views seems to be discordant with those finally selected.

Notwithstanding this, we note that there is also a methodology for the assessment of selected view points within the neighbourhood plan. Views have been assessed according to the following criteria:

- a) Important to the character and/or setting of the Conservation Area
- b) Important to the setting of a listed building(s)
- c) Important to a Character Area
- d) Important to the settlement setting and/or approach
- e) Important view of landmark feature such as a listed building; woodland; settlement or North Downs
- f) Valued by local residents (survey and consultation evidence)

The table on page 38 of the Neighbourhood Plan provides a description of the three views of the Lenacre Hall Farm site (views 1 – 3) and their reasons for inclusion. Map 18 in the Neighbourhood Plan shows these important views.

All three views have been included because they are 'valued by local residents' however there appears little evidence to support this as previously discussed.

All three views have also been included because 'they are important to a character area', not because of any inherent importance of the view itself. However there are 11 character areas within the Neighbourhood Plan – there seems little evidence as to what it is about these views that are so important to one character area where as most of the other character areas in the plan have been ignored. Notwithstanding this, viewpoint 2 appears to be taken from the rear of a character area – how it relates to a character area is therefore unknown.

One quarter of the important views identified in the neighbourhood plan appear to be directly facing into the Lenacre Hall Farm site. The Neighbourhood Plan area is large and there seems no systematic methodology undertaken to consider all views in this area, their importance and matters such as scenic beauty and visibility. Rather these views appear to have been included simply to restrict development potential of one particular site (i.e. Lenacre Hall Farm).

Viewpoint 3 is particularly concerning. It is a single glimpsed view of fields between development. To gain the view that is described and illustrated within the Neighbourhood Plan, one would need to cross the road onto an unpaved section of roadside to enjoy a view. Most residents would only experience this view as a glimpsed view whilst travelling along Sandyhurst Lane (in all probability by car). It is not a scenic beauty spot that residents would easily access or be able to linger at to enjoy a view. We would therefore seriously question whether this is truly an 'important view'.

We therefore would suggest that much more stringent background evidence is required to support the inclusion of the 'Important Views' since these do not seem to be underpinned by any objective or robust evidence base.

Representation Number	29657633
Name	Rita Hawes
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Omission
What part of the document does your comment relate to?	BAE NP1 BAE NP3 BAE NP7 BAE NP9
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>NP1 The area between Boughton Lees(pilgrims way)and the hamlet of Boughton Aluph is not mentioned. In addition to individual dwellings there is another hamlet. Malthouse Cotts is group of dwellings made up of C15 farmhouse and C19 cottages. Associated with this group is another C15 farm. This area should be included in policy NP 1which I support.</p> <p>In NP3 No mention is made of views from Pilgrims way N to Eastwell Estate and S to Downs. These should be included NP7</p> <p>While agreeing with a)in NP7 I consider that the possibility should be afforded to an annex to the already oversubscribed primary school nearby. Future housing will add pressure, there is no other school within walking distance and the building of community within a new area is helped at the school gate. The suggested school provision for Eureka depends on cars.(2per family)</p> <p>NP9 Having lived on the Pilgrims Way (Malthouse Lane) for 59 years I am aware of the increased use of the lane by walkers and runners,. It provides access to several footpaths and is a national recognised route. It therefore needs recognition in the plan.</p>

Representation Number	30374241
Name	Rachel Girt
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	All policies.
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	Having considered the full document and supporting papers I support the plan because it represents the views of residents well.

Representation Number	5909281
Name	Natural England (Consultation Service)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Boughton Aluph and Eastwell Neighbourhood Plan Regulation 16</p> <p>Thank you for your consultation on the above dated 28 September 2020.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on the draft Boughton Aluph and Eastwell Neighbourhood Plan.</p>

Representation Number	30370753
Name	Kent Police (DOCO L.Mason.)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you	<p>Thank you for opportunity to comment on the Neighbourhood plan for Boughton Aluph and Eastwell for the period 2013 to 2030.</p> <p>These comments relate to Designing Out Crime via Crime Prevention Through Environmental Design (CPTED), the National Planning Policy Framework (NPPF) and Section 17 of the Crime and Disorder Act 1998.</p> <p>CPTED:</p> <ul style="list-style-type: none"> Access and Movement: Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security; Structure: Places that are structured so that different uses do not cause conflict; Surveillance: Places where all publicly accessible spaces are overlooked; Ownership: Places that promote a sense of ownership, respect, territorial responsibility and community;

consider there to be an omission from the plan

Physical Security: Places that include necessary, well-designed security features;
Activity: Places where the level of human activity is appropriate to the location and creates a sense of security at all times;
Management and Maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and future.
NPPF:
Dated February 2019
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf We draw your attention to the following paragraphs:
127 f); 91 b); 20 b); 110 c); 95 a) and 95 b)
Section 17 of the Crime and Disorder Act 1998: Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, (a)crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and (b)the misuse of drugs, alcohol and other substances in its area and (c)re-offending in its area.
We also recommend that the latest advice from the Secured by Design (SBD) Design Guides are included: www.securedbydesign.com is incorporated when considering development applications. SBD is the UK Police flagship initiative addressing designing out crime and security. In addition to design and layout advice, they list independently certificated companies and products that meet recognised security standards and have been responsible for consistently high reductions in crime as verified by numerous independent academic research studies of 87% reduction in burglaries in new homes. There is a carbon cost for crime and incorporating SBD provides opportunity for it to be addressed.
Kent Police : Form No. 3058c rev 12/05 v2
<\\kisprod.netr.ecis.police.uk\Groups\PVP Dept\CPDA\4. Local and District Plans\Boughton Aulph and Eastwell Neighbourhood Plan response .doc .doc>
Recommendations from points in the draft report include:
• New design should protect green, amenity, leisure and recreation spaces.
• Permeability should be balanced to protect local footpaths, any bridleways, cycleways or formal desire to help avoid them becoming “narrow, unsafe, urbanised routes”.
• Sport and leisure facilities to be secure, with management and maintenance.
• New housing should incorporate advice from SBD Homes 2019 and new commercial developments should incorporate advice from SBD Commercial.
• Development layouts to maximise natural surveillance e.g. windows in side elevations.
• Perimeter treatments can include suitable hedging.

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| | <ul style="list-style-type: none">• Corner Properties and ground floor bedroom windows require defensive treatments.• Parking spaces require surveillance via “active” windows so that owners can see their vehicles, unless in a secured area.• Lighting should be designed by a qualified professional lighting engineer to provide security without creating conflict or light pollution.• Physical security should meet SBD certified standards. |
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Representation Number	15260513
Name	Alan Vaughan
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	The entire Neighbourhood Plan
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>In response to the Localism Act and Neighbourhood Planning (General) Regulations the Boughton Aluph and Eastwell Parish Council, in late 2013/early 2014, sought the opinion of local residents via the Boughton Aluph and Eastwell Residents Association on whether to: update the Parish Design Statement, to create a Parish Plan, or to produce a Neighbourhood Plan. The BA&E Residents Association subsequently recommended that of the three options a neighbourhood plan would carry most weight in any future planning considerations.</p> <p>After much hard work by many, many people, and the opportunity for the entire community to participate, The Boughton Aluph and Eastwell Neighbourhood Plan is the result. It is my opinion that this Neighbourhood Plan fairly and democratically represents the ambitions of local residents with regard to future planning and land use within the defined boundary.</p>

Representation Number	9543105
Name	Angus Fraser
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Omission
What part of the document does your comment relate to?	1. Section 5 Environment - Distinctive character areas p.17+ 2. Section 5 Landscape/Landscape character areas/Important public views p.21+
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>1. There is no mention of the three-quarter mile stretch between Malthouse Cottages (on the corner of Pilgrims Way and Brewhouse Lane) and Glebe House on Church Lane. Are we to assume that all other residences along Pilgrims Way, Brewhouse Lane and Church Lane are included in the Aluph hamlet? This seems too vague for the purposes of such a planning document and represents an important omission.</p> <p>2(a) There are references to the network of footpaths in the Parish and a few mentions of the Pilgrims Way, which goes right through the heart of the parish. There is no mention however of the international significance of the Pilgrims Way and the added responsibility that entails for its protection and preservation within our landscape.</p> <p>2(b) the need to protect the view NW from Pilgrims Way over open farmland and orchards, between Bramley Mount Farm and 1, Malthouse Cottages, is no longer recognised in the Plan and appears to be an omission.</p>

Representation Number	9532225
Name	Maxine Rumjahn
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>We are very suprised and greatly concerned that Pilgrims Way and Church Lane are not mentioned in this Neighbourhood plan. Only one photograph of the area showing a field with a public right of way across is included of the 1.1. Mile length of the present road and little of the historic paths created after the murder of Archbishop Becket.</p> <p>Also not mentioned is Church Lane and Whitehall with the vistas and forest of Kingswood - a major route of importance in terms of preserving the Village and amenities from development.</p> <p>All are in the Area of Outstanding Natural Beauty are must be protected in the same way as Boughton Lees has a proposed protected envelope. All have 360 degree exceptional views and are crisscrossed with public rights of way, which must be protected from large development. The Parish is large and all require protection and a lack of emphasis is detrimental to these less populated, but highly significant areas. The Neighbourhood Plan seems to concentrate on Eastwell, Sandyhurst Lane, Goat Lees and Eureka Park only. We would like to see a heavy bias to all areas to prohibit ribbon development of these fields along these roads including the A28 which would completely reduce the spacial awareness of the area and overturn the special street scenes and character currently enjoyed and loved by all.</p> <p>We must learn from the atrocious architecture and town planning of the 1960's when development decimated</p>

	the fabric of Britain and tuned a beautiful market town called Ashford into the South East dumping ground for London overspill.
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Representation Number	4504417
Name	Wye with Hinxhill Parish Council (Debbie Baines)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Sent on behalf of the Chairman, Wye with Hinxhill Parish Council</p> <p>Thank you for the opportunity to comment on the Boughton Aluph and Eastwell Neighbourhood Plan Regulation 16.</p> <p>Parish Councillors would like to express their congratulations to Boughton Aluph and Eastwell Parish Council, recognising the enormous effort involved in producing a Neighbourhood Plan, particularly when combining the needs of two parishes. Parish Councillors found the document easy to read and very clearly presented.</p> <p>Both Wye with Hinxhill Parish Council and Boughton Aluph and Eastwell Parish Council share common values:</p> <ul style="list-style-type: none"> • Protecting the environment, including the Area of Outstanding Natural Beauty • A desire for affordable housing • Absorbing the recognised need for new housing but in a heritage area (Eureka Park versus WYE3) • Combining the needs of two parishes <p>Wye with Hinxhill Parish Council also share concerns about building on flood plains as well as concerns about Eastwell Lake and the impact of flooding.</p> <p>Parish Councillors have recently given their support to The Village Alliance, to retain a Green buffer zone to protect Mersham from the Sevington Inland border Facility.</p>

Parish Councillors were concerned to note that there was no reference to a survey of residents' needs and priorities in the Boughton Aluph and Eastwell Neighbourhood Plan. Wye with Hinxhill Parish Council adopted this approach when developing its Neighbourhood Plan and it was extremely worthwhile, as residents were given the opportunity to contribute to the development of the Plan.

Thank you once again for the opportunity to comment on the document.

Representation Number	30374401
Name	Kennington Community Council (Charles Ellis)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	p21 - Policy BAE NP1 - Design of New Development and Conservation p44 - ecology and footpath corridors through s20 p56 - it was important to be able to walk from their home to the countryside Kennington Community Council is also looking to request a controlled crossing to be installed on the Trinity Road.
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	p21 - The protection of the Eastwell Towers, from falling to disrepair is vital for protecting the heritage and character of the area. p44 - Kennington Community Council is also engaging with the developers of the s20 site and would support adequate footpaths and the protection of local wildlife/ecology included in the plans. p56 - access to the countryside is important to everyone, strategic footpaths should be placed at the urban edge linking to adjacent countryside being adopted as a model.

Representation Number	14187489
Name	Hall
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Support
What part of the document does your comment relate to?	The whole plan in general with an emphasis on protecting the countryside and rural nature of the parish BAE NP3 Specifically regarding Sandyacres policy BAE NP2
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>With the ever expanding urban sprawl as Ashford town develops, it becomes even more important to protect the rural fringes and allow appropriate development as indicated in ABC local plan. The rural nature of the parish at the urban edge of Ashford renders it vulnerable to the negative effects of urbanisation, particularly on our ANOB. I am pleased to see that the policy NP3 places such a high importance on our countryside.</p> <p>I am pleased to see that the plan has taken into account previous comments regarding Sandyacres and adjusted the NP accordingly. Local views do matter.</p>

Representation Number	4497377
Name	Southern Water (Ms Mayall)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Omission
What part of the document does your comment relate to?	Policy BAE NP2 – Protection of Local Green Space
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Southern Water understands the desire to protect local green spaces. However, we cannot support the current wording of the above policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development. Southern water have existing underground sewerage infrastructure with associated easements within the designated local green spaces and any designation of the site should not unduly restrict future access and/or maintenance requirements of the pipelines.</p> <p>Policy BAE NP2 seeks to prevent development unless the 'proposal would not be in conflict with retaining the open green character of the site as a whole and the community value of the designated space.', however this does not take account of the potential requirement for essential utilities infrastructure.</p> <p>The National Planning Policy Framework (NPPF) (2018) establishes in paragraph 101 that Local Green Space policies should be consistent with those for Green Belts, and Paragraph 143 sets the intention of ruling out inappropriate development 'except in very special circumstances'. Paragraph 144 explains that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other considerations, whilst Paragraph 146 identifies that 'certain other forms of development are</p>

also not inappropriate' in the Green Belt, including 'engineering operations'.

Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential wastewater infrastructure required to serve new and existing customers. This is because there are limited options available with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has needs particular to the location (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'.

Proposed amendment

Having regard to the issue set out above, Southern Water propose the following addition (additional text underlined) to Policy BAE NP2 – Protection of Local Green Space
Proposals for development on land on sites designated on Maps 6 – 12 will not be permitted unless the proposal would not be in conflict with retaining the open green character of the site as a whole and the community value of the designated space, or in very special circumstances, for example where it is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available.

Representation Number	4497377
Name	Southern Water (Ms Mayall)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Omission
What part of the document does your comment relate to?	Policy BAE NP3 – Development in the Countryside
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Policy BAE NP3 seeks to prevent development outside the built up area unless it meets criteria a through to e. Southern Water would request that 'essential utilities infrastructure' be added to this list of criteria. This is because there may be limited options available for the location of new water supply or wastewater infrastructure (e.g. a new pumping station) due to the need to connect into the existing networks. The National Planning Practice Guidance (ref: 34-005-20140306) recognises this scenario and states that 'it will be important to recognise that water and wastewater infrastructure sometimes has particular locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'</p> <p>Proposed amendment</p> <p>To ensure consistency with the National Planning Policy Guidance, we propose the following additional wording (underlined) for policy BAE NP3: A proposal for development within the countryside will only be permitted where: f. <u>it is for essential utilities infrastructure.</u></p>

Representation Number	4497377
Name	Southern Water (Ms Mayall)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	Omission
What part of the document does your comment relate to?	Additional policy on the provision of water and wastewater infrastructure
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Southern Water is the statutory water and Wastewater undertaker for Boughton Aluph and Eastwell and as such has a statutory duty to serve new development within the parish. We would recommend an additional policy on the provision of water and wastewater infrastructure.</p> <p>Southern Water are regulated by OFWAT. From 1 April 2018, a new set of rules covering the charging for new connections and requisitions for companies wholly or mainly in England come into force. These new rules include requirements for water and sewerage companies to provide upfront charges for most connections services and make the charges for offsite reinforcement works more transparent and cost reflective, rather than requiring the developer to connect to the point of nearest adequate capacity. Network reinforcement, required as a result of new development, is funded through the new infrastructure charge, details can be found on our website https://www.southernwater.co.uk/developing-building/connection-charging-arrangements. NB charges are reviewed annually. The infrastructure charge is used to ensure that when new development does connect to the sewerage system, or water network that there is no detriment to our existing customers and betterment to our services where possible.</p> <p>Although there are no current plans, over the life of the Neighbourhood Plan, it may be that we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards. It is therefore important to have policy provision in the</p>

Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements.

We could find no policies to support the general provision of new or improved utilities infrastructure. The NPPF (2018) paragraph 28 establishes that communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level'. Also the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'.

Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.

Proposed amendment

To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows:

New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.

Representation Number	14519873
Name	Water Resources & Environmental, South East Water (Laia Canadell Gallant)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>South East Water would like to thank Boughton Aluph and Eastwell Parish Council and Ashford Borough Council for bringing the Boughton Aluph and Eastwell Neighbourhood Plan Consultation to our attention.</p> <p>Each water company is legally required to prepare a Water Resources Management Plan (WRMP) every five years. South East Water published our WRMP19 in August 2019. This plan sets out how we intend to maintain the balance between increasing demand for water and available supplies over the next 60 years up to 2080. The plan takes into account planned housing growth as well as the potential impact of climate change and includes our ambitious water efficiency programme. For more information please visit our website: https://corporate.southeastwater.co.uk/about-us/our-plans/water-resources-management-plan-2019/</p> <p>In South East Water's most recent business plan we have committed to play an active role regionally in relation to the impact of housing growth on water. We will develop a policy together with local stakeholders – appreciating the balance of supplying water, the need for society to ensure environmentally sustainable future water resources, and also the ongoing support of the south east region and its economic development. South East Water aims to respond to 100 per cent of all national, local and regional authority consultations and seeks to co-operate and maintain a good working relationship</p>

with local planning authorities in its area and to provide the support they need with regards to the provision of water supply infrastructure. Please see our business plan:

https://corporate.southeastwater.co.uk/media/2901/sew_five_year_business_plan_2020-2025.pdf

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ISO 9001 Certified

ISO 14001 Certified

OHSAS 18001 Certified

South East Water is an Investor in People

We are also committed partners in the Water Resources in the South East (WRSE) Group that works for the collective good of customers and the environment in the wider south east region and are nationally represented in the Water UK water resources long-term planning framework.

Our aim of reducing demand requires the use of new approaches and technology. Although there is some uncertainty on the level of savings that can be achieved we are seeing a development of new technologies and we are committed to reduce personal water usage and leakage levels in order to be more sustainable for next generations.

Our preferred plan for the period 2020 to 2025 includes a mix of demand management initiatives such as leakage reductions and an ambitious water efficiency programme.

During the period 2025 to 2045 we will continue our demand management initiatives to achieve further leakage and water efficiency savings.

South East Water have now reviewed the Neighbourhood Plan and would like to comment that:

South East Water consider that it is important and agree with Boughton Aluph and Eastwell Parish Council and Ashford Borough Council on the points raised as part of the Neighbourhood Plan objectives and would like to add that water efficiency could also be promoted to existing buildings and new buildings, either residential or non-residential across the Council.

South East Water recommend the need of a mandatory housing standards for water use which would support water efficiency on new buildings and promote the collaboration between Boughton Aluph and Eastwell Parish Council, Ashford Borough Council and developers.

South East Water will work with local authorities and developers to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure.

South East Water would like to reiterate that our primary concern is the water that we abstract and treat for public supply purposes and ensuring that the surface and groundwater abstracted does not fall below the tolerances of our water treatment works or the drinking water standards set by our regulators.

South East Water would like to be kept updated with any developments relating to Boughton Aluph and Eastwell Neighbourhood Plan and we have noted above a number of areas where we welcome an opportunity to meet and discuss with the Council. We look forward to working with Boughton Aluph and Eastwell Parish Council and Ashford Borough Council to ensure that drinking water supplies remain protected in the area in the future.

Representation Number	20758817
Name	Highways England (David Bowie)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Thank you for your notification dated 28 September 2020, inviting Highways England to comment on the Boughton Aluph and Eastwell Neighbourhood Plan Regulation 16 Consultation, seeking responses no later than 6 November 2020.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Highways England will be concerned with plans and/or proposals that have the potential to impact on the safe and efficient operation of the SRN. In the case of Boughton Aluph and Eastwell Parishes our focus will be on any potential impact to the M20 at junction 9.</p> <p>We note that Ashford Council's Local Plan 2030, adopted in February 2019, sets out a strategic allocation at Eureka Park for mixed commercial and residential development, with a capacity of 375 dwellings (Policy S20 Eureka Park). The eastern section of this site is located within the Boughton Aluph and Eastwell Neighbourhood Plan area. In addition to the strategic allocation at</p>

Eureka Park, small scale housing development in Boughton Lees built-up area is expected to come forward. There are no other development sites identified or allocated in the Neighbourhood Plan. New planning applications will be assessed according to the policies in the Neighbourhood Development Plan.

Highways England does not have any objections to the Boughton Aluph and Eastwell Neighbourhood Plan. However, if proposed new housing sites come forward or the quantum of development in parishes changes, then we will wish to be consulted and may require an assessment of the cumulative impact upon the M20 junction 9.

Thank you for consulting Highways England. Should there be any queries regarding this response, please contact the team at planningse@highwaysengland.co.uk.

Representation Number	23350369
Name	KCC (Stephanie Holt-Castle)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Thank you for consulting Kent County Council (KCC) on the Boughton Aluph & Eastwell Parishes' Neighbourhood Plan (the Neighbourhood Plan), in accordance with the Neighbourhood Planning (General) Regulations 2012.</p> <p>The County Council has reviewed the Neighbourhood Plan and for ease of reference, provides comments structured under the chapter headings and policies used within the Neighbourhood Plan.</p> <p>Section 2: Boughton Aluph & Eastwell Now</p> <p>Public Rights of Way (PRoW): The County Council welcomes the inclusion of the PRoW network as a significant asset to the parishes and would recommend that reference is made to the Kent County Council Rights of Way Improvement Plan¹ (ROWIP). This is a statutory policy document for PRoW, which sets out a strategic approach for the protection and enhancement of the network.</p> <p>The PRoW network in Boughton Aluph & Eastwell consists of 7.219 km of Bridleways and Footpaths. It is requested that the text is revised to include a separate paragraph outlining the significant benefit that a well-maintained PRoW network can bring to the socio-economic wellbeing of a rural area. This should provide details of Public Bridleways, in addition to Public Footpaths, as these provide higher rights of access for equestrians, cyclists and pedestrians.</p> <p>1 https://www.kent.gov.uk/__data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf</p> <p>2 The Neighbourhood Plan should also clarify that KCC has a statutory duty to ensure the network is recorded, protected and</p>

maintained, but works in partnership with the Parish Footpaths Group.

The County Council also requests the inclusion of the definition of a Right of Way, as suggested below:

“A way over which the public have a right to pass and repass, including Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic”.

Heritage Conservation: The origins of Boughton Aluph and Eastwell are considerably older than the Roman road junction (in contrast to the statement set out in the Neighbourhood Plan). There are numerous important prehistoric remains in the study area, including the possible Neolithic Long Barrow from Soakham Downs (scheduled monument), a late Bronze Age barrow and Iron Age cremation burials at Warren Farm, Boughton Aluph. A late Iron Age bronze mask was found at Boughton Court Farm, an Iron Age cremation at Kennington Lees, late Iron Age discoveries at Eureka Park and the cropmark traces of many sites, including ring-ditches, have been found across the area. Many of these will be prehistoric in date.

It is not accurate to state that Kempe’s Corner is the location of the junction of two Roman roads. The road from Canterbury to the Weald was indeed a constructed road, but Pilgrim’s Way remained a trackway. This is perhaps reflected in the relative paucity of Roman discoveries in the area, which only consist of some early Roman discoveries at Eureka Park, a burial at Sandhurst Park and some small metal finds.

An Anglo-Saxon burial was found between 1902 and 1904 at Tarbutt's chalk quarry near Boughton Aluph. The skeleton was found with a sword - an iron spearhead. Other burials with similar grave goods have been found in the area and a large cemetery may exist within Eastwell Park.

The medieval period saw the probable expansion of settlement in the area, reflected in the construction of the churches of St Mary’s and All Saints at Eastwell and Boughton Aluph respectively, both villages being mentioned in Domesday. High status settlement can be seen in the moated site at Park Farm Barn and (probably) Buckwell Farm, while many of the study area’s farmsteads will have medieval origins. Although Eastwell Park was only referenced in the Post Medieval period, the assembling of the land may well have taken place throughout the medieval period and much of the landscape of the study area will follow medieval land boundaries (although this would need to be assessed).

In the Post Medieval period, despite the likely older ancestry of the landscape, there will nonetheless have been significant landscape change. This is most clearly reflected in the industrialisation of the countryside with numerous limekilns, watercress beds, quarries, sand pits and brick kilns being constructed. The expansion in population during this time is also shown in the increased number of farms in the area.

There is relatively little 20th century heritage in the area, although this may reflect a lack of research. During the Second World War a tank servicing yard is believed to have been constructed at Rook Toll south of Boughton Lees. It is said to be where Churchill 'crocodile' flamethrower tanks were serviced before D-Day and there are reports that remains of roadways and tin huts still exist. The County Council recommends that the Neighbourhood Plan would benefit from a review of the history and heritage of the study area, as it is this past that has shaped the two parishes and given them the form and appearance that they have today. It would also underpin the Neighbourhood Plan's objectives for preserving the rural character of the area, as the National Planning Policy Framework's (NPPF) objectives for the historic environment complement those for landscape well and would give added weight to decision-making.

More information about the archaeological heritage of the study area can be found on KCC's website².

Section 3: Boughton and Aluph & Eastwell Future Vision to 2030
PRoW: The County Council would welcome recognition within the Neighbourhood Plan of how the PRoW network provides important access and connectivity between the identified Goat Lees area of Ashford and Boughton Aluph. This should reflect the extent to which the PRoW network meets the likely future public need in supporting more sustainable development.

Section 4: Boughton Aluph & Eastwell Parishes Neighbourhood Plan Strategy

PRoW: The County Council welcomes the inclusion of "Footpaths and Bridleways" as "valued landscapes" but requests a wording change to PRoW Network instead. The County Council would also recommend reference to the NPPF Paragraph 98, which states that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Heritage Conservation: The text states that a goal of the Neighbourhood Plan is to protect the rural parts of the study area from inappropriate development. KCC has worked with English Heritage (now Historic England) and the Kent Downs and High Weald AONB teams to prepare guidance on how historic farmsteads in Kent can be assessed for their suitability for new development or change of use³. Where such development is permitted it is important that it is in keeping with the existing character in terms of size, layout, routeways, massing and materials and that any archaeological remains associated with former phases of use are treated appropriately in the development control process.

² www.kent.gov.uk/HER

3 <http://www.highweald.org/look-after/buildings/farmsteads-and-hamlets.html>

Section 5: Neighbourhood Plan Policies

PRoW: Objectives should make specific reference to the role of the ROWIP. The PRoW network is a valuable resource that provides significant opportunities for outdoor recreation and active travel. The ROWIP can help contribute towards robust infrastructure that enables development and encourages economic growth. The Neighbourhood Plan should make specific reference to PRoW and the opportunities offered to health and wellbeing, tourism, sustainable transport and access to the environment.

Environment

Sustainable Business and Communities: The County Council welcomes the focus on the environment and protection of nature. Reference to climate change is strongly recommended, with consideration of the future resilience of the parishes to challenges presented by climate change. The County Council would recommend reference to the Climate Change Risk and Impact Assessment (CCRiA) implementation tool as a starting point - this provides some insight into the risks Kent and Medway face from climate change⁴.

The County Council would also recommend that reference is given to the need to deliver energy efficient homes and renewable energy sources where appropriate.

The Energy and Low Emissions Strategy (ELES) outlines Kent and Medway's ambition to reduce greenhouse gas emissions to net-zero emissions by 2050. Taking an evidence based approach, it identifies a pathway to reduce greenhouse gas emissions, eliminate poor air quality, reduce fuel poverty, and promote the development of an affordable, clean and secure energy supply for this county. The County Council has set a target of net-zero greenhouse gas emissions by 2050 in the ELES and would recommend reference and commitment to this target with the Neighbourhood Plan.

Heritage Conservation: Eastwell and Boughton Aluph sit in a historic landscape that contains many surviving historic features, such as the patterns of tracks, lanes and hedgerows that give character to the parishes. When considering the impact of either development or intensive agriculture on the countryside, it is important to understand the historic development of the landscape so that its essential character can be conserved. The Kent Historic Landscape Characterisation (2001)⁵ has identified the broad historic character of the landscape of Kent. Where it is to be applied locally, further study is needed to refine its conclusions, but it remains an essential tool for understanding Eastwell and Boughton Aluph's landscape. To be fully effective, the Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis at a parish level, to add

greater detail through secondary sources. This would make a good volunteer project for the parish councils and KCC would be happy to discuss this further.

4 <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/kents-changing-climate>

5 <https://www.kent.gov.uk/waste-planning-and-land/kent-landscape-information-system/resources/klis-landscape-character-resources2>

Policy BAE NP1: Design of New Development and Conservation
PRoW: Reference should be made to the ROWIP and the Kent Design Guide. It is requested that additional text is inserted into the supportive text stipulating that applicants for new developments engage with the KCC at the earliest opportunity. This would allow the County Council opportunity to review proposals and advise on suitable mitigation measures.

Heritage Conservation: To protect the landscape features as described in the policy, they must first be properly assessed so that their historic role can be ascertained. Historic Landscape Characterisation can support this⁶.

Policy BAE NP2: Protection of Local Green Spaces

Public Rights of Way: The provision of high quality open green spaces and opportunities for outdoor recreation should be a priority for the Neighbourhood Plan. The Neighbourhood Plan should aim to increase the provision of accessible green spaces and improve opportunities to access this resource. There is a growing body of evidence demonstrating that physical exercise in open green space can have a positive impact on mental health and wellbeing. Good public transport and active travel links with open spaces should be made available, so that the public are not dependent on private vehicle use for visiting these sites.

Important Public Views:

Public Rights of Way: In areas where there would be a significant effect on PRoW, the network must also be considered in the landscape planning of development. The Neighbourhood Plan should include details of how the parishes work in partnership with KCC to record, maintain and develop the network. KCC welcomes the reference to the important visual connectivity given by the PRoW network and reference of individual PRoW for the views listed, however, the "Important Views Plan" should also reference the PRoW AE207 and AE202 for clarity and context.

Policy BAE NP3: Development in the Countryside

Public Rights of Way: The County Council recommends inclusion of the following text: "In areas where there would be a significant effect on PROW, the network must also be included within landscape planning". Where PRoW would be directly affected by development proposals, plans should clarify intentions for positively accommodating, diverting or enhancing paths. It is requested that additional text is inserted into the supportive text

stipulating that applicants for new developments engage with KCC at the earliest opportunity.

Heritage Conservation: The County Council refers back to commentary within the 'Environment' section and Section 4 above.

6 <https://www.kent.gov.uk/waste-planning-and-land/kent-landscape-information-system/resources/klis-landscape-character-resources2>

Housing and Business

Digital Connectivity: In line with Government policy, KCC expects that all new homes are provisioned with gigabit-capable broadband connectivity. Reference should be included within the Neighbourhood Plan.

Sustainable Business and Communities: The County Council welcomes reference to the need to seek sustainable transport measures to serve new development and mitigate traffic impacts. Sufficient sustainable transport infrastructure, including cycling and walking infrastructure should provide transport connections within the community, which can link local amenities together. Replacing private vehicle journeys with active travel is to be encouraged.

Eureka Park

KCC requests that Map 19 includes Public Footpaths AE210 and AU3 for clarification as they will feature in any development granted permission.

The County Council welcomes specific reference to the proposed improvements to the PRow AE210 and AU3 to enable safe and attractive walking and cycling connections and links from new developments to community facilities. Increased use for business employment purposes will undoubtedly add to the pressure and importance of the surrounding PRow network, as well as including cross parish boundary routes. It is critical therefore that some wording is included within this section to ensure suitable mitigation is delivered. This could include upgrades to existing routes or the creation of new path links that address network fragmentation issues. Map 20 should refer to PRow AE210 and AU3.

Policy BAE NP5 Eureka Development

Public Rights of Way: This policy should reflect the points above.

Policy BAE NP6 Small scale residential development within Boughton Lees

Public Rights of Way: Reference should be made to the protection and enhancement of the PRow network in Boughton Lees as there are both Public Footpaths and Byway Open to all Traffic in the area. This is in order to maintain and develop safe and attractive walking and cycling connections and links from new developments to community facilities. It should also mention that a section of the North Downs Way National Trail runs through this area.

Policy BAE NP7 Land at Eureka Place Local Centre
Public Rights of Way: The County Council requests reference to the need for suitable infrastructure to develop safe walking and cycling routes both within a new development and connecting to the wider environment. Increasing levels of Active Travel participation improves public health and well-being, in addition to improving air quality by reducing short vehicle journeys and vehicle congestion. Rural lanes provide useful connections for Non-Motorised Users (NMUs) travelling between off-road PRow. The potential for additional vehicle traffic along these country lanes is therefore a concern, as increased movements could introduce safety concerns for NMUs and potentially deter public use of the PRow network.

Leisure, Wellbeing and Infrastructure
Objectives
Public Rights of Way: The County Council requests the following text is added as an objective: “to protect and enhance the PRow network and cycling routes to serve the Parish for Active Travel and leisure purposes”.

The provision of high quality open green spaces and opportunities for outdoor recreation should be a priority. The Neighbourhood Plan should aim to increase the provision of accessible green spaces and improve opportunities to access this resource. Good public transport and active travel links with open spaces should be made available, so that the public are not dependent on private vehicle use for visiting these sites. Reference to the “footpaths network” should be amended to “Public Rights of Way Network”. Any reference to the North Downs Way should give the definition of its status as a National Trail.

With regards to Map 22, KCC welcomes the specific path references and the connections beyond the Neighbourhood Plan boundary.

Policy BAE NP9 – Public Rights of Way
Public Rights of Way: This policy should reflect KCC’s policy to improve and upgrade the PRow network where it links with amenities, public transport nodes, work and education to increase the attractiveness of walking, cycling and riding as an alternative to driving. There should also be specific mention of the ROWIP, which sets out a strategic approach for the protection and enhancement of PRow, connecting the wider community and green open spaces.

Securing infrastructure
Education Provision
Education: Any additional education provision required due to new development in Boughton Aluph and Eastwell will need to be provided outside of the neighbourhood boundary.

Primary School provision
The neighbourhood of Boughton Aluph and Eastwell falls within the Ashford North primary planning group, which in total has eight

primary schools, one infant school and one junior school. This planning group stretches from the town centre in the south, to Wye in the north and across to Conningbrook in the east. One of the primary schools is located within the Boughton Aluph and Eastwell Neighbourhood - Goat Lees Primary School. This school is at capacity and on a small site so cannot be expanded. The ability to expand any of the primary schools in the Ashford North primary planning group is limited, therefore, KCC is planning for new primary school provision at Conningbrook Park - to which developer contributions will be directed.

Secondary School Provision

There is no secondary school located in the neighbourhood.

Secondary school provision will be made at Towers Secondary School, which is just outside the Neighbourhood Plan boundary, as well as at the two grammar schools located in Ashford town centre.

Waste Management: KCC, as Waste Management Authority, is now actively seeking developer contributions for essential waste infrastructure to support housing growth in the Ashford District. A project to secure additional capacity at the Ashford Waste Transfer Station is underway, along with projects at neighbouring Household Waste and Recycling Facilities (HWRC) facilities to increase capacity. The County Council would welcome the Neighbourhood Plan supporting contributions from developments within their parishes.

The County Council would welcome the following amendment:

“The proposed Eureka Park development will have a profound effect on the facilities, services and transport network within the Parishes. It is important that all new development provides, or contributes towards, off-site infrastructure in relation to transport; primary and secondary education facilities, waste management facilities, open space and sports facilities.”

Section 6: Monitoring & Review

It is requested that the KCC is directly involved in future discussions regarding projects that will affect the PRoW network; as well as engagement to consider local aspirations for access improvements and potential funding sources for the delivery of these schemes.

Representation Number	12435265
Name	Historic England (Robert Lloyd-Sweet)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Thank you for consulting Historic England on the submission version of the Boughton Aluph & Eastwell Parishes Neighbourhood Plan. Please accept my apologies that we have not been able to respond within the deadline for comment. I am happy to confirm that Historic England do not have any matter of concern within our areas of interest to raise with the examiner. As our remit is limited to the historic environment, including the conservation of heritage assets, our review is limited to where our interest could be affected and silence on other matters should not be read as agreement or consent.</p> <p>We hope these comments are of assistance to the examiner but would be pleased to answer queries or provide further information to aid the examination process if needed.</p>

Representation Number	18396545
Name	Environment Agency - Consultation email (EA Consultation)
Do you support, object or consider there to be an omission from the contents of the Boughton Aluph and Eastwell Neighbourhood Plan?	
What part of the document does your comment relate to?	
Please state fully and clearly below the grounds of your objection or support, or whether you consider there to be an omission from the plan	<p>Good afternoon</p> <p>Thank you for consulting us on this. Apologies for our delay in getting back to you.</p> <p>Having reviewed the document, we have no comments to make.</p>