

# LENHAM

NEIGHBOURHOOD PLAN 2017-2031

QUALITY GROWTH QUALITY LIFE



**REGULATION 16 CONSULTATION STATEMENT**

**Submission Version**

**NOVEMBER 2019**

**LNP4**





# LENHAM PARISH COUNCIL

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## **1. Lenham Neighbourhood Plan 2012-2016**

- 1.1 Work commenced on producing a neighbourhood plan for Lenham in 2012. In February 2016 a Public Consultation Statement was published which summarised the work to date as follows:
- 1) Consultation in 2012-2013
  - 2) Tour of the Parish on 6<sup>th</sup> November 2014
  - 3) Lenham Market on 9<sup>th</sup> November 2014
  - 4) Public Consultation Event on 16<sup>th</sup> November 2014
  - 5) Public Consultation Event on 23<sup>rd</sup> November 2014
  - 6) Public consultation Event on 21<sup>st</sup> February 2015
  - 7) Public Consultation Event on 7<sup>th</sup> May 2015
  - 8) Schools Consultation Events on 5<sup>th</sup>/6<sup>th</sup> October 2015
  - 9) Public Consultation Event on 17<sup>th</sup> October 2015
  - 10) Public Consultation Event on 21<sup>st</sup> November 2015
- 1.2 In each case, the 2016 statement reviewed what happened, the purpose and what was presented.
- 1.3 In addition to the above events, public evidence gathering was conducted by the HIVE work groups during the course of 2014. These comprised sector work groups in Housing, Infrastructure, Village Life and Economy.
- 1.4 The Parish conducted a Housing Needs Survey in November 2014. This also was presented as a stand-alone document as part of the evidence base of the Plan. This had a 30% response rate, which is considered high and representing a sufficiently large and workable cross section of the population of the Parish.
- 1.5 As the body of consultation feedback increased the Plan was able to evolve to take account of community views. From this, specific meetings were organised with businesses and landowners whose land holdings were of potential relevance with the emerging plan.
- 1.6 Lenham Parish Council has always taken a proactive approach to understanding that change is inevitable. The Parish Council has been eager to support a community-led document which would represent the views of the village and be a useful tool to influence development within the Parish.
- 1.7 This analysis was done in conjunction with Members' research into national policy. The Plan has continued to be developed in accordance with the revised 2019 NPPF. This was undertaken in parallel with the monitoring of the Maidstone Borough Council emerging Local Plan. This was an important exercise in itself and enable the Group to provide a detailed response to the ongoing Local Plan consultation. This has encouraged Steering Group members and local residents to gain a better understanding of the planning process and the impact of the Local Plan on Lenham.
- 1.8 Discussion with Maidstone Borough Council revealed that the February 2016 Plan was held to be contrary to employment protection policies within the adopted Maidstone Borough Local Plan (2000), which comprised the development plan for Lenham at that time.
- 1.9 The Borough Council advised that, in order to comply with the basic conditions that apply to all neighbourhood plans, the Plan had to be in general conformity with the strategic policies contained within the development plan for Maidstone.
- 1.10 A note explaining the legislative context and how the basic conditions apply to all neighbourhood plans is included as Appendix A to this Statement.



- 1.11 At that time, the Borough Council advised that the 2016 Plan was also held to be contrary to similar employment protection policies contained in the emerging replacement plan which was to become Maidstone Borough Local Plan (MBLP) which was adopted in October 2017. The employment protection policies were aimed at keeping key employment sites such as Marley and Lenham Storage within employment use.
- 1.12 As a result, the Parish Council decided to publish a revised Pre-Regulation 14 Consultation Draft Plan in August 2017. This Plan achieved the housing allocation required in MBLP but did not need to rely on the use of existing employment sites such as Marley and Lenham Storage to achieve this.



## **2. Lenham Neighbourhood Plan 2017**

- 2.1 Lenham Parish Council published the following three documents in 2017 which comprise the Lenham Neighbourhood Plan Pre-Regulation 14 Consultation Draft:
- 1) Lenham Neighbourhood Plan Pre-Regulation 14 Consultation Draft Plan Policies Document dated 24<sup>th</sup> August 2017;
  - 2) Local Green Space Background Report;
  - 3) Strategic Infrastructure Delivery Report.
- 2.2 The 2017 Plan was given wide publicity. Details of the Public Consultation are given at Appendix B to this Statement.
- 2.3 A key message derived from the Public Consultation was on acceptance of the three areas for development proposed in the Plan.
- 2.4 There was also support for the key elements of infrastructure proposed, including the link road, extending the footbridge over the railway to serve the sites to the south and the provision of additional parking to serve the station.
- 2.5 There was majority support for the sale of William Pitt Field for housing use and relocation of the sports facilities to the east of the village. The support for the new sports facilities included support for the provision of floodlighting in this area.
- 2.6 There was more support for the expansion of the existing primary school than for the provision of a new primary school on a new site within the proposed development.
- 2.7 There was support for the introduction of traffic calming around the Square including an expansion of the area of double yellow lines. There was no support for the introduction of a one-way system in the village centre or for making existing car parks pay and go.
- 2.8 In terms of village enhancements, the highest scoring item was the provision of additional parking to serve the Square. An environmental upgrade of the Square was also supported, as was the purchase and maintenance of countryside amenity sites. An upgrade to Lenham Community Centre received less support.
- 2.9 The formal consultee responses are recorded at Appendix C.
- 2.10 Most of the suggestions made by Maidstone Borough Council (Respondent No. 1) at that time could be accepted by the Parish Council. An area of debate with the Borough Council has been the identification of an area of land to the east of the village given the designation Special Landscape Area in the 2017 Plan. This point was also picked up by Dean Lewis Estates (Respondent No. 2) who represent land ownership interests to the east of Lenham.
- 2.11 One respondent (No. 4) suggested that the link road (as it was then called) should run around the outer perimeter of the development sites to form a by-pass to the expanded Lenham village. It was held that the provision of an outer by-pass to Lenham would not meet the necessity test for planning obligations and would therefore not comply with basic condition (a) regarding having regard to national policies and advice.
- 2.12 Respondent 5 asked the Parish Council to ensure that the necessary infrastructure to serve the new housing was actually provided. This respondent was also concerned about potential social divisiveness and low design standards in new housing.
- 2.13 The Kent Downs AONB Unit asked that the housing area to the east of Lenham be reconsidered. This has been a recurring theme in the Plan and careful attention to Masterplanning in this area has secured a significant improvement in landscape mitigation both within the proposed housing area and on its periphery.

- 2.14 Another respondent (No. 7) raised the issue of the residential development of William Pitt Field. This issue was considered in the questionnaire responses with broad support indicated for the proposal (see paragraph 2.5 above).
- 2.15 Natural England echoed the response from the Kent Downs AONB Unit. The result was that Lenham Parish Council agreed to commission its own landscape appraisal to form part of the evidence base supporting the Plan at 2019 Submission Plan stage.
- 2.16 Barton Willmore made a representation in support the release of Lenham Sandpit for some housing. Lenham Parish Council consider the inclusion of housing at this location in the Neighbourhood Plan would not be as sustainable as other options included in the Plan. The allocation of housing at the Sandpit would therefore not be consistent with basic conditions (1), (4) and potentially (5) because of conflict with countryside protection policies within MBLP (2017).
- 2.17 Southern Water noted that an extension to the Lenham Wastewater Treatment Works, which are located to the south-east of the village, may be needed. Following further consultation and briefing, Southern Water has confirmed that an expansion to the Wastewater Treatment Works is now included within their five-year investment programme.



### **3. Lenham Neighbourhood Plan Regulation 14 Draft (September 2018)**

- 3.1 Having given consideration to the responses to the 2017 Plan, Lenham Parish Council published a Regulation 14 Draft Plan in September 2018.
- 3.2 The 2018 Plan comprised three documents as follows:
  - 1) Lenham Neighbourhood Plan Regulation 14 Consultation Draft (September 2018);
  - 2) Strategic Environmental Assessment for the LNP (September 2018);
  - 3) Lenham Neighbourhood Plan Transport Assessment (2018).
- 3.3 A consultation event was held in the Tithe Barn, close to Lenham Square on Saturday 6th October 2018. This event was attended by some 650 people. The event contained displays illustrating many aspects of the Plan, including housing sites proposed for development in the Plan.
- 3.4 A question and answer session was held in an extension to the main barn exhibition space. Professional advisors and Parish Councillors were able to debate various aspects of the Plan for over one hour with interested residents.
- 3.5 The consultation period for the 2018 Plan ran from 24<sup>th</sup> September 2018 to 12<sup>th</sup> November 2018. A questionnaire survey was available at the event and was given wide distribution within the Parish during the consultation period.
- 3.6 Some 80 responses were received to the questionnaire and the results are given at Appendix D.
- 3.7 The Plan proposals for protecting green spaces received support with 36 respondents in support against 13 who thought this element was poor and 34 'don't know'.
- 3.8 There was more support for the development proposals than those who thought this element was poor, although in each case the majority of respondents answered 'don't know' in relation to those questions.
- 3.9 A total of 23 formal responses was received at this stage.
- 3.10 The responses are given at Appendix E with a detailed explanation of the Parish Council's proposed response to each one.



#### **4. Sites Suggested for Residential Development and Not Selected**

- 4.1 During the Consultation on the 2017 and 2018 Plans, five sites were proposed for development. The Parish Council did not feel the allocations of these sites would meet with the basic conditions.
- 4.2 The sites are described in some detail at Appendix F with reasons given why the Parish Council did feel their allocation would meet with basic conditions.

#### **5. Issues Raised during Consultation and How these Issues have been addressed**

- 5.1 A series of issues has been raised during the consultation process on the 2017 and 2018 Plans.
- 5.2 Each of these issues is considered in Appendix G with a description of whether the Plan is to be altered prior to Submission as a consequence.

#### **6. Who was consulted on the Plan?**

- 6.1 Appendix H comprises a list of bodies and individuals consulted on the Plan. This list includes the Consultation Bodies which Lenham Parish Council considered should be consulted.
- 6.2 Discussions with Maidstone Borough Council and the landowners lead to the conclusion that the Plan should be supported by a Masterplanning Report. This report was commissioned by Locality and prepared by AECOM. A draft of the Masterplanning Report was the subject of consultation with members of the Infrastructure Delivery Group (IDG) on 19<sup>th</sup> October and Maidstone Borough Council.
- 6.3 Following discussion at a meeting of the IDG on 19<sup>th</sup> November 2019, members of the IDG were again consulted on the Masterplanning Report on 22<sup>nd</sup> November 2019 together with a Technical Note which explained how the requirements for outdoor sport had been calculated in the Plan.
- 6.4 The December 2019 version of the Masterplanning Report which is submitted with the Plan reflects the results of these consultations and discussions. The proposals for Site 5 (Countryside) now follow closely a Concept Plan produced by OSP and submitted in support of a planning application made by Countryside.
- 6.5 Communication and consultation with Maidstone Borough Council has been ongoing throughout the preparation of the Plan. On 30<sup>th</sup> October the Parish Council sent the Borough Council an advanced draft of the Plan itself, the Basic Conditions Statement (BCS) and the Consultation Statement (CS) prior to submission. On 11<sup>th</sup> November the Borough Council made some further comments on the drafts.
- 6.6 MBC requested that additional consultation be undertaken with the consultation bodies representing Southern Gas Networks, BT Openreach, UK Power Networks and the Mobile Operators Association. These consultations have been undertaken and the responses have been taken into account by the Parish Council in finalising the Plan.

## APPENDIX A

### LEGISLATIVE CONTEXT AND THE BASIC CONDITIONS

1. The legislative framework for any Neighbourhood Development Plan is that the plan (or order) must meet the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004. A draft plan (or order) meets the basic conditions (and thus can proceed to the referendum stage without modification) if:
  - a. having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
  - b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
  - c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
  - d. the making of the order contributes to the achievement of sustainable development,
  - e. the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
  - f. the making of the order does not breach, and is otherwise compatible with, EU obligations, and
  - g. Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Plan. The prescribed condition is that the making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or an offshore marine site (as defined in the Offshore Marine Conservation (Natural habitats etc.) Regulations 2007) (either alone or in combination with other plans or projects).
2. The legislation refers to the making of a plan or other order such as a Neighbourhood Development Order including a community right to build order. Not all of the basic conditions apply to the making of a Neighbourhood Development Plan. The basic conditions which apply to the making of a Neighbourhood Development Plan are (a), (d), (e), (f) and (g) from the above list.
3. Throughout the documentation supporting this plan each of the five basic conditions will be referred to by reference to one of the above letters. The need to contribute to the achievement of sustainable development, for example, will be referred to as basic condition (d).

## **APPENDIX B**

### **PRE-REGULATION 14 CONSULTATION DRAFT (AUGUST 2017)**

#### **Public Consultation Responses**

1. The Plan Policies Document of the Pre-Regulation 14 Consultation Draft was published by Lenham Parish Council on 24<sup>th</sup> August 2017. The Plan and its supporting documents were placed on the Parish Council website as follows:

- 1) Lenham Neighbourhood Plan Pre-Regulation 14 Consultation Draft (Plan Policies Document) dated 24<sup>th</sup> August 2017;
- 2) Local Green Space Background Report;
- 3) Strategic Infrastructure Delivery Report.

A public consultation event was held at Lenham Primary School on Saturday 17<sup>th</sup> September 2017. That event was given wide publicity within the Parish and was attended by approximately 550 people.

The following questionnaire survey was given wide distribution at that time.

#### **Consultation Questionnaire**

We are required to find locations for 1,000 houses. Around 47 hectares of land has been put forward as available for housing development. After allowance for the Maidstone Local Plan Policy DM22 (Publicly accessible open space and recreation), we have around 36 hectares on which to deliver 1,000 houses. At the required density of 30 dwellings per hectare we have sufficient development land available to satisfy this need but with little room to manoeuvre.

Today, you have viewed proposals to deliver the required number together with community facilities that ensure that Lenham will remain a well-functioning and sustainable community.

The purpose of the Consultation is to present proposals but also to take feedback on viable alternatives. Please take time to consider the questions below and to indicate your own views. Only by hearing your thoughts can we update the Plan to reflect the community viewpoint albeit that we must ultimately comply with the Maidstone Local Plan policies.

#### **South of the Railway**

- 1) Do you agree with building here?
- 2) Are 450 homes too many?
  - a. What number would you prefer?
  - b. Where would you locate the 'lost' housing to make up the required 1,000?
- 3) Do you support a link road connecting Headcorn Road to Old Ham Lane?
- 4) Do you support an extended railway footbridge to give direct access to the rail station?
- 5) Do you support additional station car parking here?



### **West of Ham Lane**

- 1) Do you agree with building here?
- 2) Are 465 homes too many?
  - a. What number would you prefer?
  - b. Where would you locate the 'lost' housing to make up the required 1,000?
- 3) Do you support a new road through this development connecting directly to the A20?
- 4) Do you support an improved junction at the top of Ham Lane and the A20?
- 5) If KCC require a new primary school does it make sense to locate it here?

### **East of Lenham**

- 1) Do you agree with building here?
- 2) Are 85 homes too many?
  - a. If not, what number would you prefer?
  - b. Where would you locate the required 'lost' housing?
- 3) Are you in favour of having a special landscape area here?

### **Sports facilities**

- 1) Do you support the sale of William Pitt Field and a relocation to new and improved sports and recreation facilities, including football pitches?
- 2) Is the development of new sport and recreational facilities including football pitches to the east of the village a good idea?
  - a. If not, why not?
- 3) The village supports 7 football teams and this number will grow. Is building an all-weather sports pitch to greatly increase usage a good idea?
- 4) Should an all-weather sports pitch have floodlighting to maximise usage?

### **Education**

- 1) Increased primary school provision is required. How might this be best provided (Please mark in order of preference – 1 = most preferred)
  - a. A new two form entry primary school at Ham Lane with existing primary school retained
  - b. Expansion of the existing primary school to provide two additional forms of entry
  - c. Expansion of The Lenham School (formerly Swadelands School) to provide two additional primary forms of entry

## **Parking**

Lenham desperately needs additional car parking

- 1) Where would you locate a new car park? \_\_\_\_\_
- 2) Should existing car parks become “Pay and Go” facilities?

## **Traffic management**

A traffic management study is being undertaken

- 1) Would you support a one-way system within the village centre?
- 2) Should traffic calming measures be introduced around the Square?
- 3) Would you support further double yellow lines within the village?

## **Village enhancements**

The Parish Council will receive funds from developers to be used for village enhancement. How would you like to see this spent? Rank in order of importance (1 = most important)

- 1) Environmental Upgrade of Lenham Square
- 2) Provision of additional parking to serve Lenham Square
- 3) Enhancement of facilities for Sport and Recreation
- 4) Purchase, laying out and maintenance of important countryside amenity sites within Lenham Parish
- 5) Contributions towards the provision of new and upgraded footpath/cycleways within the Parish
- 6) Upgrade to Lenham Community Centre.
- 7) Other \_\_\_\_\_

What facilities would you suggest for 12 to 17 years old within the village?

\_\_\_\_\_

**RESULTS TABLES**

		<b>yes</b>	<b>don't know</b>	<b>no</b>
<u><b>South</b></u>				
Agree building here?		101	4	47
Are 450 houses too many?		82	21	48
What number do you prefer?			53	
Location for lost housing			87	
Do you support link Road?		116	12	23
Extended Rail Footbridge for access from South		125	14	13
Do you support Additional Station car parking		125	11	19
<u><b>West of Ham Lane</b></u>				
Agree building here?		97	12	44
Are 465 houses too Many?		73	25	49
What number do you prefer?			32	
Location for lost housing			97	
Do you support new Rd to A20		114	11	25
Do you support new junction at Ham Lane and A20		117	12	18
Do you support sale of Pitt Field & relocation to east?		83	31	36
If KCC require a new primary school does it make sense to locate in West		70	49	32
<u><b>East of Village</b></u>				
Agree building here?		86	10	58
Are 85 houses too Many?		64	26	57
What number do you prefer?			40	
Location for lost housing			82	
Do you support location of new sports facilities here?		112	16	24
Do you support an all-weather pitch here?		109	32	20
Do you support flood lighting here?		78	26	35



Below is a summary of the consultation responses after all 158 questionnaires were received and analysed.

		yes	don't know	no
<u>Other Proposals</u>				
Do you support a new 2 form Primary School?		38	31	47
Do you support expansion of existing Primary School?		85	64	11
Do you support expansion of Lenham School?		22	39	45
Should existing car parks become pay n' go?		39	17	91
Where would you locate a new car park			118	
Would you support a one-way system in the village centre?		39	31	81
Should traffic calming be introduced around The Square?		78	14	57
Would you support further double yellow lines?		77	16	57

Village Enhancements (Rated)	1	2	3	4	5	6	7
Environmental Upgrade of The Square	36	14	25	21	17	3	
Additional Parking to serve The Square	59	34	3	17	14	6	2
Enhancement of sport & recreation facilities	25	23	22	15	19	21	2
Purchase and maintenance of countryside amenity sites	32	26	28	16	14	5	
Contribution towards footpaths and cycleways	20	21	35	32	9	7	1
Upgrade of Lenham Community Centre	4	10	12	9	18	42	10
Other	1	2	1		2	3	23

A total of 158 replies were received and analysed. The results of this analysis are summarised as follows:

### **South of the Railway**

Support for building is 101 in favour to 47 against with 4 don't know.

82 people thought the number should be reduced but none of these offered a viable alternative location for the housing they did not want.

There was overwhelming support for the link road, the improvement of Ham Lane at its junction with the A20 and the footbridge over the railway despite the fact that all are dependent on the full-build programme.

### **West of Ham Lane**

Support for building is 97 in favour to 44 against with 12 don't know.

73 people thought the number should be reduced but none of these offered a viable alternative location for the housing they did not want.

There was overwhelming support for the link road and the improvement of Ham Lane at its junction with the A20, despite the fact that all are dependent on the full-build programme.

Selling William Pitt Field had a smaller majority, 83 for, 31 don't know and 36 against.

There was a clear response to the suggestion that if a new primary school was needed it should be located to the west of the village. Some 70 respondents supported this proposal with 49 answering don't know and 32 against.

### **East of Lenham**

Support for building is 86 in favour to 58 against with 10 don't know.

64 people thought the number should be reduced but none of these offered a viable alternative location for the housing they did not want.

57 people did vote for no reduction in numbers.

There was overwhelming support for the new sports facilities, the all-weather pitch and 78 to 35 were in favour of floodlighting, despite the fact that these are all dependent on the full-build programme.

### **Other Proposals**

There was more support for the expansion of the existing primary school (85) than for the creation of a new two form of entry primary school (38).

There was some support for a new car park but over half of the respondents would not support a proposal for existing car parks to become pay and go. Over half of respondents would not support the introduction of a one-way system in the village centre. There was, however, some support for traffic calming around the Square and for the provision of further double yellow lines.

The purchase and maintenance of countryside and amenity sites was supported in the questionnaire as was the provision of enhanced footways and cycleways together with improved sport and recreation facilities.

## **APPENDIX C**

### **PRE-REGULATION 14 CONSULTATION DRAFT (AUGUST 2017)**

#### **CONSULTEE RESPONSES:**

1. Maidstone Borough Council	21 <sup>st</sup> September 2017
2. Dean Lewis Estates	30 <sup>th</sup> September 2017
3. Peter Brazier	4 <sup>th</sup> October 2017
4. Lesley Feakes	1 <sup>st</sup> October 2017
5. Carol Cannon	30 <sup>th</sup> September 2017
6. Kent Downs AONB	October 2017
7. Peter Bailey	1 <sup>st</sup> September 2017
8. Natural England	28 <sup>th</sup> September 2017
9. Wealden Homes	27 <sup>th</sup> September 2017
10. Kent Wildlife Trust	29 <sup>th</sup> September 2017
11. Southern Water Services	28 <sup>th</sup> September 2017
12. Barton Willmore	29 <sup>th</sup> September 2017



**Pre-Regulation 14 Consultation Draft (August 2017)****Consultee Responses**

	<b>Consultation Comment</b>	<b>Lenham Parish Council Response</b>
	<b>Maidstone Borough Council</b>	<b>21<sup>st</sup> September 2017</b>
1.	Maidstone Borough Council advised that Community Infrastructure Levy would be introduced, and the Plan should reflect this.	Agreed – policies and text to be re-drafted accordingly for 2019.
2.	Maidstone Borough Council advised that the Parish Council would receive 25% of CIL receipts with a made Neighbourhood Plan in place.	Noted.
3.	Maidstone Borough Council advised that the Plan should show the new clubhouse and parking in more detail.	Agreed – revised Masterplan to be produced for 2019.
4.	Maidstone Borough Council advised Strategic Environmental Assessment (SEA) was needed.	Strategic Environmental Assessment (SEA) was produced for 2018 and will up-dated for 2019.
5.	The Map should be called Lenham Local Policies Map (LLPM).	Agreed – revised map to be produced for 2019.
6.	Policies should be written in the positive not the negative.	Agreed – policies and text to be re-drafted accordingly for 2019.
7.	Maidstone Borough Council encouraged inclusion of Masterplans in the Plan.	Agreed – revised Masterplan to be produced for 2019.
8.	Maidstone Borough Council said planning conditions could be included in the written justification but not in the policies in the Plan because such an approach might constrain development unnecessarily.	Agreed – policies and text to be re-drafted accordingly for 2019.
9.	Maidstone Borough Council pointed out the difficulty of having a policy requiring safeguarding of a school site if it was eventually not needed and would not be justified as public open space.	Agreed – following further consultation with KCC it is now agreed that a new primary school site will not be needed.
10.	Maidstone Borough Council wished to be kept up-to-date with the establishment of Lenham Meadows Trust.	Lenham Meadows Trust is now fully formed with charitable status.
11.	Lenham Parish Council agreed to submit an advance draft of the Regulation 14 Plan to Maidstone Borough Council for advance comment.	Noted.
12.	There was a discussion regarding Maidstone Borough Local Plan public open that was to be integrated into the Plan.	Agreed – policies and text to be re-drafted accordingly for 2019.

13.	It was agreed to distinguish graphically on Lenham Local Policies Map existing commitment housing sites and those forming the 1000 dwelling allocation for the broad location allocation.	Agreed – revised map to be produced for 2019.
14.	There was a discussion as to how sites for self-build housing could be included within the Plan.	Noted.
15.	The use of the term SLA (Special Landscape Area) was regarded as not correct by Maidstone Borough Council. Lenham Parish Council agreed to review the use of this term for valued local landscapes.	Agreed – Special Landscape Area notation to be replaced by Lenham Local Valued Landscape for 2019.
16.	Maidstone Borough Council could support some areas proposed for Local Green Space (LGS) but not other larger areas.	Lenham Parish Council to review and reduce the number of sites proposed as Local Green Space.
17.	The Plan should always use the term public open space for areas of land which will be given over to public access.	Agreed.
18.	The Plan should use the correct term Kent Downs Area of Outstanding Natural Beauty to refer to the Area of Outstanding Natural Beauty (AONB).	Agreed.

	<b>Dean Lewis Estates</b>	<b>30<sup>th</sup> September 2017</b>
1.	The Plan should demonstrate deliverability of sites where this requires collaboration between constituent land owners.	Agreed.
2.	Dean Lewis Estates supports the Plan proposals in general but objects to over specific phasing restrictions relating to certain items of infrastructure.	Agreed. Modify the Plan to be less restrictive.
3.	Dean Lewis Estates objects to the provision of a 15 metre wide landscape corridor to the north of Ashford Road. This should be 5 metres wide only.	Agreed. Modify the Plan accordingly.
4.	Dean Lewis Estates object to the area of land shown as Special Landscape Area (SLA) on the basis that it is evidentially flawed.	Lenham Parish Council to review the landscape evidence for this proposal and provide a detailed Report as evidence base to justify this proposal.

	<b>Peter Brazier</b>	<b>4<sup>th</sup> October 2017</b>
1.	Suggest an area of land for residential allocation south of the railway and west of Old Ham Lane.	This proposal is not accepted as the land in question is compromised by heritage and environmental constraints and is not well related to existing built up area of Lenham and an allocation here would not meet the basic conditions.

	<b>Lesley Feakes</b>	<b>1<sup>st</sup> October 2017</b>
1.	The headwaters of the River Stour are of paramount importance. There should be no building to the east of Lenham.	Lenham Parish Council considers the proposed residential site to the east of Lenham is compromised in landscape terms by the industrial estate to the north of it.
2.	There should be a perimeter road to the west and south with no building allowed beyond it.	The road proposed is a development access road running through the housing sites not an external by-pass to Lenham. A by-pass would exceed the level of infrastructure needed to simply serve the development proposed and would not therefore meet the basic conditions.

	<b>Carol Cannon</b>	<b>30<sup>th</sup> September 2017</b>
1.	Building to the south and west of Lenham will create a 'them and us' situation with little assimilation with the existing community.	Lenham Parish Council will promote a pro-active set of policies and proposals to integrate new development so far as possible.
2.	Infrastructure improvements promised by house builders rarely materialise.	Lenham Parish Council will actively work to seek to ensure promised and necessary infrastructure is actually delivered.
3.	Large developers create perfect designs on a computer but in reality this falls short of expectations.	Lenham Parish Council will promote policies to encourage a high standard of design in all new developments.

	<b>Kent Downs Area of Outstanding Natural Beauty</b>	<b>October 2017</b>
1.	Concern about the allocation to the east of Lenham (SHD58). This should be reconsidered.	Lenham Parish Council has engaged in collaborative Masterplanning to this area with the owners to effectively maximise the mitigation of landscape impacts.

	<b>Peter Bailey</b>	<b>1<sup>st</sup> September 2017</b>
1.	The Parish population will be doubled and that of the village will increase by 2.6 times.	Noted.
2.	The development should incorporate retail, leisure, sports and recreation facilities.	Noted.
3.	The development of William Pitt Field is financially motivated and needs a clear village mandate.	Noted.
4.	Road positioning needs approval from Kent County Council.	Accepted. Lenham Parish Council commissioned a Transport Study. This Study was completed in 2018 and revised in 2019 in full consultation with KCC.
5.	Supports the fact that large tracts of land to the east of Lenham are not shown as residential allocations.	Noted.

	<b>Natural England</b>	<b>28<sup>th</sup> September 2017</b>
1.	Generally accepts the policies dealing with the natural environment.	Noted.
2.	Potential impacts on Kent Downs Area of Outstanding Natural Beauty should be considered.	Noted. Lenham Parish Council commissioned a landscape report to be completed in 2019 and Masterplanning to maximise the mitigation of landscape impacts.
3.	Environmental considerations relating to the best and most versatile agricultural land should be considered.	Accepted.

	<b>Wealden Homes</b>	<b>27<sup>th</sup> September 2017</b>
1.	More work is needed on the highway infrastructure needed to improved Ham Lane and the junction with the A20.	Accepted. Lenham Parish Council commissioned a Transport Study. This Study was completed in 2018 and revised in 2019 in full consultation with KCC.

	<b>Kent Wildlife Trust</b>	<b>29<sup>th</sup> September 2017</b>
1.	Support for the aims of the Plan to protect the natural environment.	Noted and welcomed

	<b>Barton Willmore</b>	<b>September 2017</b>
1.	Promote the development of housing at the Lenham Sandpits site.	Because of its relative isolation from the built-up area, Lenham Parish Council consider this proposed housing site would not meet with the basic conditions for Neighbourhood Plans.

	<b>Southern Water Services</b>	<b>29<sup>th</sup> September 2017</b>
1.	An extension to the wastewater treatment works (WTW) may be required to accommodate the new development. This process is planned and funded through the water industry's 5 yearly price review process.	Noted. Consultation with Southern Water indicates a scheme for the extension of Lenham WTW within its existing site is now in the five- year investment programme.



## APPENDIX D

### REGULATION 14 CONSULTATION DRAFT (SEPTEMBER 2018)

#### Public Consultation

Having considered the responses given at the 2017 consultation, the Parish Council decided to publish a Regulation 14 Consultation Draft Plan. The Plan was published by Lenham Parish Council on 24<sup>th</sup> September 2018. The Plan and its supporting documents were placed on the Parish Council website as follows:

- 1) Lenham Neighbourhood Plan Regulation 14 Consultation Draft (September 2018)
- 2) Strategic Environmental Assessment for the LNP (September 2018)
- 3) Lenham Neighbourhood Plan Transport Assessment (2018)

A public consultation event was held at the Tithe Barn, Court Lodge, Lenham, ME17 2QD from 10.00 a.m. to 4.00 p.m. on Saturday 6<sup>th</sup> October 2018.

The consultation period ran from 24<sup>th</sup> September 2018 to 12<sup>th</sup> November 2018.

The consultation was given wide publicity within the Parish. Posters and banners were erected at key locations advertising the consultation. Copies of the draft Plan were deposited at shops, cafes, pubs and other key venues in the Parish.

Copies of the questionnaires were handed out freely at the consultation event and replies were also invited via the Parish Council Website.

Lenham Neighbourhood Plan Reg 14 Draft Questionnaire				
How Did We Do?				
Topic	Good	OK	Poor	Comment
<b>The Plan</b>				
Professional Presentation				
Relevant Pictures				
Clear Explanation of the Problems and Options				
In Tune with your expectations				
<b>Your View of Plan Policies</b>				
Design Qualities				
Transport Policies				
Protecting Green Spaces				
Lenham Square				
Employment				
Community Facilities				
Doctors				
<b>Sports Proposals</b>				
Cricket				
Football				
Bowls				

continued over...

Lenham Neighbourhood Plan Reg 14 Draft Questionnaire				
How Did We Do?				
Topic	Good	OK	Poor	Comment
<b>Education</b>				
Nursery				
Primary School				
Secondary School				
<b>Village Extensions</b>				
North East				
South West				
South of Railway				
North West				
<p>Please write in your own proposals for where we should spend the CIL money, for example on sports clubs and fields, on the Community Centre, on car parking and square renovation of The Square, on improving access to the countryside or on any other project</p>				
<p>Please send any further comments to Nick Osborne, Lenham Neighbourhood Plan Group at  e-mail: <a href="mailto:nick@lenhamparishcouncil.org.uk">nick@lenhamparishcouncil.org.uk</a>  or by post to Lenham Parish Council 13 Mercer Drive Harrietsham ME17 1AY  All comments should be sent to the above email or address by the 12th November 2018</p>				

In the end some 80 responses were received and collated. These are summarised in the paper “How Did We Do?”

## How Did We Do?

80 responses

Topic	Good	OK	Poor
Professional Presentation ?	68	11	4
Relevant Pictures?	64	16	3
Clear Explanation of the Problems and Options	52	27	4
In Tune with your expectations?	40	31	11
<b>Your View of Plan Policies</b>			
Design Qualities	39	38	6
Transport Policies	19	42	22
Protecting Green Spaces	36	34	13
Lenham Square	28	37	18
Employment	14	53	16
Community Facilities	30	44	9
Doctors	24	38	21
<b>Sports Proposals</b>			
Cricket	38	43	2
Football	46	35	2
Bowls	37	43	3

## How Did We Do?

80 responses

Topic	Good	OK	Poor
<b>Education</b>			
Nursery	39	41	3
Primary School	39	39	5
Secondary School	33	47	3
<b>Village Extensions</b>			
North East	19	52	11
South West	20	54	9
South of Railway	26	47	10
North West	23	50	10

## How Did We Do?

80 responses

Topic	Good	OK	Poor
<p>Please write in your own proposals for where we should spend the CIL money, for example on sports clubs and fields , on the Community Centre, on car parking and renovation of The Square, on improving access to the countryside or on any other project</p>	<p>Most Common</p> <p>This is a one off!</p>	<p>Car Parking needed</p> <p>Clubs for children and teens</p> <p>Retail &amp; social needs in area of new houses</p> <p>New motorway junction!</p> <p>New sports area for cricket field if it loses current area.</p> <p>New Village Green with car parking</p> <p>Grants to improve buildings around The Square</p> <p>Pedestrianise Lenham Square</p> <p>New Toilets</p> <p>Larger Primary School</p> <p>Nursery Open 7:30 to 6pm</p> <p>Youth Club</p> <p>Other sports Netball, Hockey, Tennis, Swimming.</p>	

## APPENDIX E

### REGULATION 14 CONSULTATION DRAFT (SEPTEMBER 2018)

#### CONSULTEE RESPONSES:

1. Tom Foxford	
2. Wealden Homes	9 <sup>th</sup> November 2018
3. Peter Bailey	27 <sup>th</sup> September 2018
4. Ulcombe Parish Council	
5. Barton Willmore (Lenham Sandpit)	12 <sup>th</sup> November 2018
6. Michael Ballard	
7. Highways England	
8. John Britt	
9. West Kent CCG	
10. Historic England	12 <sup>th</sup> November 2018
11. William Boyd, Gillian Boyd,	11 <sup>th</sup> October 2018
12. Joanna Curtis, Mark Boyd	
13. (Four Bees Partners)	
14. Consilium (Inkstand Bungalow)	8 <sup>th</sup> November 2018
15. Kent Downs AONB	2 <sup>nd</sup> October 2018
16. Countryside Properties (DHA)	9 <sup>th</sup> November 2018
17. Cllrs Tom & Janetta Sams	25 <sup>th</sup> October 2018
18. Dean Lewis Estates	November 2018
19. Savills (David Knight)	9 <sup>th</sup> November 2018
20. Boughton Malherbe Parish Council	12 <sup>th</sup> November 2018
21. CPRE Maidstone	14 <sup>th</sup> October 2018
22. Kent County Council	12 <sup>th</sup> November 2018
23. Russell Ownership	9 <sup>th</sup> November 2018
24. Maidstone Borough Council	6 <sup>th</sup> November 2018
25. Eastwood-Towers	12 <sup>th</sup> November 2018

## REGULATION 14 CONSULTATION DRAFT (SEPTEMBER 2018)

### CONSULTEE RESPONSES

	Consultee Comment	Lenham Parish Council Response
	<b>Tom Foxford</b>	
1.	Larger developments should be required to release 10% of their plots for self-build/small developers to encourage and preserve the individuality of the village and support a wider range of local trades.	This proposal echoes government policy as set out in paragraph 68 of the NPPF, for example. <b>MODIFY</b> the Plan to incorporate the suggestion at NPPF paragraph 68 (d) that developers be encouraged to subdivide large sites.
2.	Adequate parking should be provided on new developments. Layouts should allow for the parking of works vehicles on new estates. Public transport has limited applicability rural areas.	How private motor vehicles should be accommodated is a major urban design consideration. The Plan encourages high quality design which will need to balance many competing considerations and demands for space. <b>MODIFY</b> the Plan to require a condition ensuring a construction method statement covering issues such as parking of contractors vehicles is approved prior to commencement of building.
3.	Full support for better footpaths and cycle provision in the Plan area.	Noted and welcomed.
4.	Should new parking be provided to the south of the station? Should disabled access be improved at the station?	This is a welcome objective. <b>MODIFY</b> Policy EMP2 to encourage more parking and disabled access at the station. <b>MODIFY</b> Policy SHDS3 to refer to disabled access (it already encourages more parking to the south of the railway).
5.	The Plan should provide enhanced footpath and cycle links to Sandway.	This is a welcome objective. <b>MODIFY</b> the Plan to make specific reference to such an improvement in paragraph 13.3.4 (Lenham Parish Infrastructure Projects).
6.	Supports the new road connecting Headcorn Road with Ham Lane rail bridge and the A20 (Southern Link Road). The junction of the new road with the Headcorn Road has potential to be dangerous and should be designed appropriately.	Noted and welcomed. SHD Sites 2 and 4 together have the potential to facilitate a safe junction of the Southern Link Road with the Headcorn Road which will deal properly with traffic flows.



7.	Traffic heading east towards Ashford will still wish to use the Square. Thought should be given to the east of the village.	The Plan provides the best possible mitigation of local traffic conditions whilst still meeting the basic conditions.
8.	Support for the overall presentation of the Plan which is well thought out.	Noted and welcomed.

	<b>Wealden Homes</b>	<b>9<sup>th</sup> November 2018</b>
1.	<p>Delivery of Sites</p> <p>Wealden have an interest in land west of Loder Close and Westwood Close (SHD Site 7). This site can deliver approximately 54 dwellings post April 2021. To achieve a continuous flow of implementable sites over the 10 years commencing in April 2021 planning permissions need to be issued well in advance of that date</p>	<p>Noted and welcome</p> <p>A planning application on this site has been subject to a resolution to grant planning permission for 5 x dwellings. <b>MODIFY</b> the Plan to reflect this reduced capacity.</p>
2.	<p>Design Quality</p> <p>a. The table at 4.15 of the Plan is both too simplistic and introduces too many variables thereby creating a ‘toy town’ effect.</p> <p>b. Policy D1 should make reference to ‘Building for Life 12’ as a document which aids the design process.</p>	<p>Noted. The table at paragraph 4.1.5 should be <b>MODIFIED</b> in the light of this and other representations on the Plan. Design quality could be enhanced by production of a design guide/code and this could be prepared by or on behalf of developers and facilitated through the Infrastructure Delivery Group.</p> <p>Agreed. <b>MODIFY</b> the Plan accordingly.</p>
3.	<p>Active Travel.</p> <p>Policy AT makes reference to ‘developer funding’ to facilitate a parish-wide cycle and footway strategy. The Plan should make it clear that this should be covered by CIL funding.</p>	<p>Developer funding encompasses a number of sources including CIL. Where enhanced footway/cycleway connectivity is required within a development site this can be provided either by physical infrastructure on site or through S106 obligations. The Plan should be <b>MODIFIED</b> to clarify the position on sources of funding and the mechanism for the delivery of infrastructure. There is a typographical error in Section 5.3 and the Policy AT should be renumbered Policy AT3.</p>

4.	Village Pond and Associated Open Land is land in private ownership and not owned by the Parish Council	Agreed. <b>MODIFY</b> the Plan to state that this land is now in the ownership of Lenham Meadows Trust.
5.	Education The future education provision in the Plan is unclear and needs clarification.	Agreed. <b>MODIFY</b> the Plan to clarify future provisions for primary education.
6.	Strategic House Delivery Sites Paragraph 11.1.4 The site at Old Ham Lane is shown with capacity for 82 dwellings, which number is now reduced to 70 as a result of approval of reserved matters. This reduces the traffic generation anticipated from this site.	The cumulative impact of Loder Close with the remaining dwellings in the Plan has been assessed by KCC and MBC in the context of the current planning application.
7.	Design and Layout There is a typographical error and the reference should be to link with sites to the 'north, west and south' and not 'north and east'.	Agreed. <b>MODIFY</b> the Plan to correct the error.

	<b>Peter Bailey</b>	<b>27<sup>th</sup> September 2018</b>
1.	Lenham village population will grow from an estimated 2000 in 2011 to an estimated 6000 in 2031, approximately three times. This level of change requires revolution not evolution in the approach taken by the Parish Council. The number of cars owned will also treble.	Noted
2.	The Plan focusses mainly on Lenham village where the major impact will be felt. Problems include: <ul style="list-style-type: none"> <li>• Traffic congestion;</li> <li>• Severe shortage of parking spaces;</li> <li>• Problems of congestion at community centre/surgery when a major event occupies the hall;</li> <li>• Loss of quality business in The Square;</li> <li>• Waiting time at surgery lengthening.</li> </ul>	The Plan adopts a strategy to best mitigate the impacts of growth whilst still meeting the basic conditions.
3.	The Transport Assessment suggests only 20 new parking spaces will be needed. The distance from most of the new housing to The Square exceeds 'maximum' walking distance of 800m to 1200m contained in government guidance.	Noted.

4.	One basic concept in the Plan is the retention of the Square and High Street as the activity centre of the community to 2031 and beyond. This is a flawed concept on the basis of increased traffic usage and parking issues alone.	Noted. The NPPF at paragraph 102 states that transport issues should be considered from the earliest stages of plan-making and development proposals so that opportunities to promote walking, cycling and public transport use are identified and pursued. This is the approach taken in the Plan.
5.	The Plan has lack of coherence on the planning for the station.	Agreed. <b>MODIFY</b> Policy EMP2 to consider more fully what is proposed both sides of the railway.
6.	Concern about the sale of village assets (William Pitt Field).	William Pitt Field will be surrounded by new housing developments. The Plan takes the view that new and enhanced recreational facilities to serve the Parish should be provided at a larger site in association with SHD Site One to the east of the village.
7.	Keep the Square and provide a new, stylish economic/recreation centre to the west and balance Lenham 2031.	The Plan supports the criterion of a new centre to the south associated with the station. (See 5 above.)

	<b>Ulcombe Parish Council</b>	
1.	More parking should be provided in the vicinity of Lenham Square allowing the Square itself to be free from cars.	Noted and welcomed.
2.	<p>a. The additional houses proposed will cause gridlock on Liverton Hill which is a pinch point and single track in places. More commuters will seek to drive from Lenham to Headcorn Station. This should be considered by MBC.</p> <p>b. There will also be additional pressure on Junction 8 of the M20 with up to one-mile tailbacks currently experienced.</p>	Noted. The Parish Council can only assume that these issues were fully considered by the Borough Council in consultation with the County Council when the distribution of new housing sites in MBLP (2017) was arrived at.
3.	Supports a larger car park for Lenham Station than the 15 additional spaces included in Policy SHDS3.	Agreed. <b>MODIFY</b> EMP2 to consider more fully what is proposed both sides of the railway
4.	Two new roundabouts on the A20 at Lenham will cause more congestion on the major trunk road.	Noted. <b>MODIFY</b> the Plan to remove the easternmost new roundabout.
5.	Maidstone Borough Council should initiate a dialogue with Government about a new junction 8a. Such a new motorway junction	This proposal is clearly outside the scope of Lenham Neighbourhood Plan. If implemented it would only increase

	could be provided close to Lenham to allow commuters more easy access onto the motorway and ease congestion at M20 Junction 8.	unwelcome pressures for further urbanisation within the Parish. The Plan should not be modified to accept this suggestion.
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	<b>Barton Willmore (Lenham Sandpit)</b>	<b>12<sup>th</sup> November 2015</b>
1.	The Representation follows extensive consultation with Maidstone Borough Council and Lenham Parish Council.	Noted and Agreed.
2.	<p>The Representations propose 15 dwellings comprising:</p> <ul style="list-style-type: none"> <li>• Affordable/starter homes 40%</li> <li>• Open market dwellings 20%</li> <li>• Self-build units 40%</li> </ul> <p>Land would be put towards Lenham Amenity Trust to include a fishing lake, wildlife and nature trail area a further (16th) dwelling as warden's accommodation.</p>	Noted and Agreed.
3.	The site is described in the Regulation 14 Draft Plan as a suggested development site but does not form part of the allocation of 1000 dwellings required to fulfil the MBLP broad location at Lenham.	Noted and Agreed.
4.	The Parish Council has indicated support for the above-mentioned package of development.	Noted and Agreed.
5.	Section 20 of the representation describes the site and its surroundings. The site is circa 3.67ha in extent and lies some 1.6km for the south of Lenham.	Noted and Agreed.
6.	The promoters acknowledge (paragraph 3.2 that the location is 'less sustainable than other potential development sites (adjoining the village boundary)'.	Noted and Agreed.
7.	Because the site is less sustainable it is not promoted to form part of the 1000 dwellings needed to fulfil the MBLP broad location allocation at Lenham.	Noted and Agreed.
8.	The site could be allocated in addition to the 1000 dwellings.	Lenham Parish Council does not wish to increase the size of the allocation to 1016 dwellings as required to support this Representation.

<p>9.</p>	<p><b>Basic Conditions</b></p> <p>a. Having regard to national policies it is appropriate to make the Plan.</p> <p>b. The making of the Plan should contribute to the achievement of sustainable development.</p> <p>c. The making of the Plan should be in general conformity with the strategic policies contained in the development plan (in this case MBLP).</p> <p>d. The fourth and fifth basic conditions relate to EU obligations and other prescribed conditions.</p> <p>e. The representations make many statements regarding compliance with the basic conditions.</p>	<p>Because the site lies outside of an existing settlement, the proposals are not located to promote sustainable development in rural areas. As such they conflict with paragraphs 78 and 79 of the revised NPPF.</p> <p>Because the site lies outside of any settlement, it does not offer the opportunity to promote walking, cycling or public transport. As such the proposals conflict with paragraph 102 (c) of the revised NPPF and do not overall contribute to the achievement of sustainable development.</p> <p>Strategic Policy SP17 in MBLP (2017) deals with development in the countryside which by definition includes the site which is the subject of this representation. Policy SP17 (1) states that development proposals in the countryside ‘will not be permitted’ unless they accord with other policies in the Plan and will not result in harm to the character and appearance of the area. Neither exception applies to this proposal and it does not therefore accord with the development plan, contrary to the basic conditions.</p> <p>In its representation on the Plan, MBC has said that the SEA should assess all potential development sites including those ultimately rejected by the Parish Council and reference to rejected sites made in the early sections of the Plan.</p> <p>Having carefully considered all the points made, the Parish Council, having regard to all material considerations, does not wish to allocate the site for development in the Plan.</p>
<p>10.</p>	<p>The representation site is a candidate for identification as a rural exception site under the provisions of the NPPF, paragraph 77.</p>	<p>The Parish Council accepts that there are some advantages to the development of the site which could be promoted for development through a planning application without the need for further allocations within the Plan.</p>



	<b>Michael Ballard</b>	
1.	A number of local residents have identified errors in the Plan.	Agreed. <b>MODIFY</b> the Plan to remove identified errors in the Lenham Local Policies Map.
2.	The list of Local Green Spaces identified in Policy LGS1 does not include the area between Royton Avenue and the A20. The land in question was shown as Open Green Space in a Lenham Local Plan produced in 1974. Residents request the Parish Council to show the area at Royton Avenue as Local Green Space (LGS).	Having regard to all considerations the Parish Council does not regard it as appropriate to identify the land at Royton Avenue as Local Green Space.
3.	Traffic conditions on the A20 have worsened with the frequent closure of the M20 by Highways England, a situation projected to worsen with Brexit.	Noted

	<b>Highways England</b>	
1.	The Plan does not materially affect the safety reliability and/or operation of the strategic road network. Highways England does not offer any comments assuming the maximum housing provision (1000) contained is not exceeded and that the highways mitigation outlined in Maidstone's Infrastructure Delivery Plan (2016) is fully secured.	Noted

	<b>John Britt</b>	
1.	It is important to clarify that the Plan will be given a local backing if more than 50% of those participating in the referendum vote in support.	Agreed. <b>MODIFY</b> paragraph 14.3 of the Plan accordingly.

	<b>West Kent CCG</b>	
1.	<p>The CCG is the NHS organisation responsible for securing developer contributions towards improvements to general practice infrastructure to accommodate growth.</p> <p>CCG is working with general practices and has discussed the current growth proposals with the Len Valley Practice. The Plan, at Policy CF3, supports the inclusion of a policy for healthcare infrastructure and securing</p>	<p>Agreed. <b>MODIFY</b> Policy CF3 to state that a scheme to deliver an appropriate upgrade of local doctors facilities within the Len Valley Practice will be developed at the appropriate time and that the project will be delivered through the CIL process.</p> <p><b>MODIFY</b> Section 13.2 of the Plan to include a scheme of appropriate healthcare improvements in the list of Strategic Infrastructure Projects.</p>

	developer contributions. The CCG will work with the Len Valley Practice to ensure a plan is developed at the appropriate time to deliver the required expansion of infrastructure. A proposal will be submitted through the Community Infrastructure Levy process at the appropriate time.	
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	<b>Historic England</b>	<b>12<sup>th</sup> November 2018</b>
1.	Sets out the role of Historic England in promoting conservation and enjoyment of heritage assets. Notes positive features in the Plan in relation to preserving views from Kent Downs AONB, the Pilgrims Way Trail and the recently listed Lenham Cross.	Noted and welcomed.
2.	The provision of the green wedge that protects the setting of the conservation area through Policy LLLA1 is one for which Historic England expresses particular support.	Noted and welcomed.
3.	Considers none of the proposed site allocations have direct impacts on designated heritage assets that are not managed through to the policies of the Plan.	Noted and welcomed.
4.	The SEA points out that the Historic Environment Record (HER) for Kent contains a number of recorded sites of archaeological interest (over 200) within the Parish. It is not clear how these sites are distributed and how any particular impacts have been taken into account.	This is a point which has also been made by KCC in its representation. The recording of heritage assets and their subsequent mitigation is considered in Policy SP18 and Policy DM4 of the MBLP (2017). The Plan should be <b>MODIFIED</b> by way of a cross reference to these policies.
5.	<p>The Plan should similarly consider available evidence about non-designated heritage assets to inform decision making. English Heritage points out that surveys undertaken for the Channel Tunnel Rail Link may provide helpful data. As a result:</p> <p>a. The Plan should demonstrate that it has sought to minimise or avoid harm through the choice of sites, including giving a suitable level of importance to</p>	Historic England are an important consultee and Lenham Parish Council has secured the provision of a desk-based archaeological review of the Plan which will be published before proceeding to Regulation 16 Submission Draft stage.

	<p>the conservation of sites of regional and national importance;</p> <p>b. The Plan should explain what use has been made of the data held within the Kent HER. Without this information, it is not clear that the Plan will deliver sustainable development;</p> <p>c. Without further analysis of the potential impact on non-designated heritage assets, including archaeological remains, England Heritage consider the Strategic Environmental Assessment (SEA) to be insufficiently detailed to adequately assess the Plan policies;</p> <p>d. Analysis which shows that sites of archaeological remains are thought to be present does not mean that land cannot be allocated. The Plan could contain policies to guide developers to undertake suitable investigations to ensure that the proposals avoid harm and preserve nationally important remains in-situ.</p>	
6.	<p>Suggests that Policy D1 should be re-written so that it does not repeat commonly accepted matters, such as the expected contents of design and access statements. Supports clear guidance on what will be required such as how to protect views from the AONB to the north. The policy could, for example, state where it might be acceptable for development to rise to four storeys in height. Notes that the NPPF is supportive of the use of design codes.</p>	<p>Agreed. The wording of the policy should be reviewed in the light of these comments and those made by MBC and <b>MODIFIED</b> accordingly. The opportunity to provide Design Codes/Guides should be examined in the Plan in discussion with the developers/landowners of the major sites.</p>

	<b>William Boyd, Gillian Boyd, Joanna Curtis, Mark Boyd (Four Bees Partners)</b>	<b>11<sup>th</sup> October 2018</b>
1.	The representation is submitted on behalf of the partners of the 'Four Bees Partnership', who have an ownership interest in land east of Lenham which lies	Noted.

	behind the Tithe Barn and extends south to the railway. The representation included a concept Masterplan showing 8.5 hectares of land immediately to the east of Old School Close for residential development. The balance of the site (also 8.5 hectares) was shown proposed for informal and amenity green space.	
2.	The owners believe the land described has been re-designated as a SLA 'special landscape area' in the Parish Plan.	The land in question forms part of the Lenham Local Landscape Area (LLLA) designation within Lenham Neighbourhood Plan Regulation 14 Consultation Draft (September 2018).
3.	The owners who hold a majority share strongly object to the imposition of the SLA designation without prior knowledge or any form of contact. The lack of consultation is unacceptable.	The land was shown as Special Landscape Area (SLA) within Lenham Neighbourhood Plan Pre-Regulation 14 Consultation Draft (August 2017). This Plan was the subject of extensive consultation in September 2017.
4.	If the designation is not removed before the Plan is submitted to MBC at Regulation 16 stage the owners will be forced to take legal action.	LPC believe it is appropriate to retain a designation on this land albeit that the title has changed from SLA to Lenham Valued Landscape (LVL) following consultation with MBC. Lenham Parish Council believes the residential allocation of land at this location would be harmful to the landscape setting of the village in conflict with the landscape strategy of the Plan and would not meet the basic conditions.

	<b>Consilium (Inkstand Bungalow)</b>	<b>8<sup>th</sup> November 2018</b>
1.	Wish to submit the site for inclusion as a residential land allocation as part of the Plan.	The Plan and its supporting documents have considered the best locations for development at Lenham and ruled this site out for very good reasons.
2.	The site is available as an early phase of development.	Although it is accepted that the site (in part) is brownfield land it is detached from the edge of the built-up area of Lenham Village. Because it would be contrary to the landscape strategy of the Plan, Lenham Parish Council believes the residential allocation of this land would be contrary to the basic conditions for all neighbourhood plans.
3.	The land is approximately 1 hectare comprising Inkstand Bungalow, a boarding cattery, equestrian buildings, paddock land and sand school. At 30 dph the site could	As such the development would be perceived as extending the built-up area into a very attractive section of countryside with far reaching views, including Oxley

	potentially yield 30-35 dwellings. The site is on the edge of the village in a sustainable location away from the AONB and close to Lenham Railway Station and bus routes in the centre of the village.	Wood. In making this statement, Lenham Parish Council acknowledges that the land to the west of the Headcorn Road is allocated for development. The land to the west, in contrast, has much more localised views and is already committed for large scale residential development at the Goods Yard. The requirement to provide smaller sites rests with Maidstone Council across the Borough as a whole.
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	Kent Downs AONB	2 <sup>nd</sup> October 2018
1.	The representation sets out the legal status of the AONB and explains the relevant policy guidance.	Noted.
2.	The AONB is erroneously referred to as the North Down AONB in the Plan and the area should be given its proper title, the Kent Downs AONB.	Noted. <b>MODIFY</b> the Plan to correct this error.
3.	AONB Unit make suggestions for revision to Policy DQ1 to: a) 'have regard' to the AONB; b) Avoid large areas of pale colour (i.e. pale painted render) on north facing elevations, facing the AONB; c) Refer to 'feather edged weatherboarding' rather than the more modern shiplap cladding.	Agreed. <b>MODIFY</b> the Plan as suggested.
4.	At paragraph 11.2.2 the plan should make it explicit that the SHD Sites will also be expected to comply with Policy DQ1.	Agreed. <b>MODIFY</b> the Plan as suggested.
5.	The AONB Unit has concerns about the location of SHD Site 1: a) The site is visible from the AONB to the north; b) Notwithstanding the location of the Business Park and the existing consent at Tanyard Farm the site is regarded as an extension of the village to the east onto currently rural, undeveloped land; c) The proximity of the AONB means the visual impact could not be satisfactory mitigated; d) Development on this site would make it hard to resist future development on	The comments on Site 1 are noted.  Whilst this site does form one of the least damaging sites for development on the edge of Lenham and is therefore retained, it is agreed that more could be done to mitigate the visual impact and the Plan should be <b>MODIFIED</b> in this regard.



	<p>land between the site and the village as well as on land to the south of this;</p> <p>e) The structural landscaping on the north side of the A20 Ashford Road, whilst welcomed, would help mitigate views to the business park from the AONB but would do little to mitigate views to the proposed housing;</p> <p>f) The proposed woodland should have an irregular edge especially on the northern side, to ensure it appears as a natural feature in the landscape.</p>	
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	<b>Countryside Properties (DHA)</b>	<b>9<sup>th</sup> November 2018</b>
	<b>Scope of Comments</b>	
1.	Countryside controls Strategic Site 5 in LNP, 2018. Supports the thrust of the emerging Plan and welcomes the opportunity to comment on specifics relating to delivery. Notes that the Plan will be examined in relation to the five 'basic conditions' for neighbourhood plans set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).	Noted and welcomed.
	<b>Appropriateness</b>	
2.	Consider it wholly appropriate for LPC to prepare a neighbourhood plan on behalf of the local community. Consider the timing is appropriate as LNP (2018) follows on from the adoption of MBLP (2017) and will provide a vehicle for local influence on the type and form of development.	Noted and welcomed.
	<b>Contribution to Sustainable Development Vision</b>	
3.	Notes that the vision of the Plan is essentially pragmatic to balance conservation while allowing appropriate growth. The Plan could adopt a more balanced approach to emphasize that development should be focussed on the least harmful sites.	Agreed. The work contained in the Landscape Report which underpins the Plan has confirmed that the Plan has selected the least damaging sites for development. <b>MODIFY</b> the Plan to better explain the site selection process.
4.	Suggests that the Vision could be re-written to emphasize the need to reflect social cohesion in terms of improving the quality	Agreed. <b>MODIFY</b> the Vision to read as follows: 'Protect the most important heritage features of Lenham village and the

	of life for residents. The suggested amended text for the Vision is shown opposite.	hamlets of the Parish, and where possible preserve and enhance their setting in relation to the AONB, and the rural parts of the Parish, while allowing appropriate growth in the areas that offer the greatest scope to absorb change and ensuring that the parish continues to provide the services and social infrastructure to support current and future generations’.
	<b>General Requirements</b>	
5.	Makes suggested changes to the wording of Policy SHDS1.	The wording of that (and all policies) is the subject of ongoing discussion and agreement with MBC. It is considered that the suggested wording makes some of the obligations required of developers in formulating development proposals a little too loose and will not give the local planning authority the degree of control which is sought. Disagree. Do not accept the proposed changes.
6.	Considers the design parameters in D1 are excessively prescriptive and are unlikely to lead to good placemaking. Suggests a wording to better reflect paragraph 124 of the NPPF.	The suggested wording is not accepted for similar reasons to those given in 5 above.  Disagree. Do not accept the proposed changes.
	<b>Cycle Infrastructure</b>	
7.	Policy AT1 states that the Parish Council will look to develop a parish-wide cycle and footway strategy. This is welcomed but should be planned in a comprehensive manner as part of the wider masterplan for the Broad Location area to ensure it is cohesively and conveniently designed.	Agreed. <b>MODIFY</b> the Plan accordingly. All seven developers/promoters are invited to collaborate in the production of Masterplans for each of the three areas to demonstrate how sustainable transportation infrastructure can be achieved.
	<b>Open Space and Infrastructure in Developer Contributions</b>	
8.	Further consideration should be given to the way open space and the provision of a site for a potential new primary school are dealt with in the Plan. A letter from Pitman’s Law, dated 7 <sup>th</sup> November, is appended to the representation giving advice on the circumstances in which it is appropriate to require developer contributions for infrastructure which may be required to mitigate development across one or more sites.	Agreed. Further consideration is being given to these issues. The Plan should <b>MODIFIED</b> to remove the requirements for the developer to provide a site for a future 2FE primary school.

	<b>Positivity of Wording</b>	
9.	Policy wording generally takes a negative stance. An example is given for Policy AQ2 to suggest that appropriate applications 'will be supported'.	Agreed. Positive wording for policies is being considered with MBC and the Plan should be <b>MODIFIED</b> accordingly.
	<b>Conformity with Development Plan</b>	
10.	One of the basic conditions is that the Plan should be in general conformity with the strategic policies contained in the development plan. The representation notes that Section 2.2 of the Plan provides a robust explanation of the higher level strategic policies within MBLP (2017) which the Plan has to be in general conformity with. This approach is supported.	Noted and welcomed.

	<b>Cllrs Tom &amp; Janetta Sams</b>	<b>25<sup>th</sup> October 2018</b>
	<b>Consultation Response</b>	
1.	Congratulations to the LNPG on producing a document which gives the community a real focus.	Noted and welcomed.
	<b>Local Needs Affordable Housing</b>	
2.	Suggest a policy from Woodcote (Oxon) Neighbourhood Plan offering 20% of all new affordable housing to be offered initially to those with a strong long connection to the Parish.	Agreed. <b>MODIFY</b> the Plan to incorporate such a policy in consultation with Officers at MBC.
	<b>Housing Types</b>	
3.	Discuss with developers the option to 'future proof' homes to allow for subsequent installation of care-focused equipment such as hoists to facilitate lifetime trends.	Agreed. <b>MODIFY</b> the Plan to register the importance of Lifetime Homes ( <a href="http://lifetimehomes.org.uk">lifetimehomes.org.uk</a> ).
	<b>Education</b>	
4.	Residents wish to see the current primary school as the focus for investment, upgrading and improvement.	Agreed. The Plan should be <b>MODIFIED</b> to only support the expansion of Lenham (and Harrietsham) Primary Schools.
5.	Support the provision of a nursery school.	Noted and welcomed.

	<b>Highways, Transport and Parking</b>	
6.	Lenham could be served by a shuttle bus system to allow workers to park outside the village in car parks with electric vehicle charging points. The shuttlebus could be a continuous circular route linking key facilities such as the school hub, train station, The Square and key employment sites.	Agreed. <b>MODIFY</b> the Plan to include this suggestion with a recommendation that its viability be examined by KCC as part of a Strategic Infrastructure Project.
7.	The entire village, and certainly The Square, should be subject to a 20mph speed limit.	Agreed. <b>MODIFY</b> the Plan so that 20mph speed reduction is supported as part of a scheme of environmental enhancement at The Square funded by the Neighbourhood (Lenham Parish) portion of CIL.
	<b>Retail</b>	
8.	The residential areas should include some retail facilities within them.	Agreed. Retain the retail elements suggested within SHD Site3 and Policy EMP2.
	<b>Broadband and Mobile</b>	
9.	The Plan should include policies aiming to enhance broadband and mobile phone infrastructure. Kent County Council also makes a similar point (see NPPF paragraph 112).	Agreed. <b>MODIFY</b> the Plan to include enhancement of mobile and broadband as Strategic Infrastructure Projects.
	<b>Lenham Health Centre</b>	
10.	Residents found the draft Plan section on Lenham Health Centre (paragraph 8.3.1) disappointing and inadequate. [See NPPF paragraph 91 (c).]	Agreed. <b>MODIFY</b> the plan to state that the growth at Lenham should be supported by proportionate and timely expansion of health Infrastructure. This proposed expansion should be added to the list of Strategic Infrastructure Projects.
	<b>Air Quality and Renewables</b>	
11.	The introduction of shuttle buses will reduce car movements and consequent pollution. (See NPPF paragraph 102).	Agreed. <b>MODIFY</b> the Plan to recommend that the viability of the shuttlebus be included as a Strategic Infrastructure Project.
12.	The Plan should aim to build zero carbon buildings through a range of sustainable construction measures.	Agreed. <b>MODIFY</b> Policy AQ2 to encourage the use of sustainable construction measures in all development proposals.
	<b>Lenham Railway Station</b>	
13.	The station is so important that it should have its own policy.	Agreed. See Policy EMP2.
14.	The station policy should include provision for it to be a mini social hub which should include disabled access. [See NPPF paragraph 91 (a).]	Agreed. <b>MODIFY</b> Policy EMP2 accordingly.

	<b>Green Space and Connectivity</b>	
15.	Green spaces should be linked by accessible paths and cycleways. The scheme for this proposed in Section 13.2 of the Plan should be at the heart of design within the development proposals. The developers should be asked to demonstrate how this will be achieved within each site and linked to other neighbouring development areas. [See NPPF paragraph 91 (c).]	Policy SHDS 1 (V) (General Requirements) goes some way towards meeting this representation by the need to prepare and submit a detailed Masterplan for each site. The Plan should be <b>MODIFIED</b> by a revision to Policy SHDS 1 (V) to make it clear that the Masterplans should show clear connectivity by footpaths and cycleways within and between green spaces on the subject site and neighbouring sites.
	<b>Disabled Access</b>	
16.	The Plan should state the expectation of providing 'Access for All' so that each scheme can be signed off/checked by our residents who are disabled. An access group of local residents could be formed to scrutinise proposals so that the channel is open for those with differing disabilities to express their views. [See NPPF paragraph 111 (b).]	Agreed. <b>MODIFY</b> the Plan accordingly.
	<b>Conclusion</b>	
17.	<ul style="list-style-type: none"> <li>a) The Plan is an inspiring live document;</li> <li>b) LNPG has engaged positively with the public and the Plan has changed as circumstances have changed;</li> <li>c) Parishioners have shown their interest by the number who have attended the events organised by LNPG;</li> <li>d) Residents feel part of the process as their ideas have been discussed and form part of the document;</li> <li>e) The respondents are hopeful that residents will continue to be involved and from this will come a positive result at the future referendum.</li> </ul>	Noted and welcomed.

	<b>Dean Lewis Estate</b>	<b>November 2018</b>
	<b>Introduction – Policy SHDS1</b>	
1.	The ownership has given a commitment to LNPG to work collaboratively with other owners to facilitate the timely delivery of the Plan strategy. The homes and sports facilities promoted within SHDS1 will deliver major community benefits for the present and future generation of Lenham residents.	Noted and welcomed.

	<b>Legislative Context</b>	
2.	The present Regulation 14 Draft Plan has the potential to meet the basic conditions for Neighbourhood Plans. Further evidence is needed to demonstrate overall delivery and viability of the Plan proposals.	Noted. A Viability Study has been commissioned and will form an integral part of the evidence base supporting the Plan at Regulation 16 stage.
	<b>LNP – The Vision</b>	
3.	Dean Lewis Estates (DLE) supports the ‘LNP Vision’ and notes that the growth within LNP has been identified by allocating fewer sensitive areas for development.	Noted. A Landscape Study has been commissioned and will form an integral part of the evidence base supporting the Plan at Regulation 16 stage.
	<b>High Quality Design</b>	
4.	DLE supports the policy criteria within Policy D1 to secure high-quality design. There is, however, a double negative in the wording which should be modified to read “There shall be a presumption in favour of innovative and contemporary design”.	Agreed. The wording should be <b>MODIFIED</b> as suggested.
	<b>Lenham Local Landscape Area (Policy LLLA1)</b>	
5.	The area proposed as Lenham Local Landscape Area (LLLA) in the Plan has never before been included within any landscape designation. The landscape north of Old Ashford Road (which is not in the proposed LLLA) was in contrast designated with MBLP 2000 as a Special Landscape Area.	The earlier designation of Special Landscape Area in MBLP 2000 has been superseded by the fact that a large tranche of this land has been allocated for residential development in MBLP 2017 and subsequently granted planning permission for housing. This is a new circumstance which will materially change the landscape setting of the area north of Old Ashford Road.
6.	The area forms part of ‘East Lenham Vale’ within the Maidstone Landscape Character Assessment (update 2013). This is a linear character area broadly following the A20 corridor. The LLLA attracts discrete consideration and forms part of a wider character area. DLE objects to the introduction of the LLLA designation within the Plan and supports the deletion of Policy LLLA1.	The Maidstone Landscape Character Assessment (update 2013) has been reinforced by the much more detailed 2019 Landscape Report produced for LNP. The 2019 Report supports the judgement of LPC that this area adds uniquely to the special character of Lenham village as a green lung of countryside running to the heart of the village at the Parish Church and The Square. This is indeed a truly valued landscape within the context of NPPF paragraph 170 (a). The Parish Council believes it is a highly important function of LNP to identify and protect special local landscapes of such high scenic value. No alteration to the Plan should be made as a result of this representation.



	<b>Education</b>	
7.	DLE supports a hybrid of option (a) expanding the current Lenham Primary School on site and option (b) allowing for the subsequent construction of a new 2FE primary school.	The most up-to-date information on education is contained within the response to the KCC representation contained elsewhere in this Report. The most recent figures (including the reduced child product arising from the construction of flats) indicate that expansion of Harrietsham primary school to 2FE, together with the expansion of Lenham primary school to 2FE will more than accommodate the educational needs arising from all commitments in both villages (including 1000 additional dwellings at Lenham as a result of the broad location allocation). The Plan should be <b>MODIFIED</b> as set out in the response to the KCC representation to delete any requirement for a new 2FE primary school site and concentrate investment by an expansion of the existing Lenham primary school as suggested in MBLP (2017), the development plan.
	<b>Deliverability of Area 2 – South-West of Lenham Village Extension.</b>	
8.	DLE supports the inclusion of the above area which comprises sites 2, 3 and 4 in the Plan. There is concern that not all the land may be genuinely available for development at this time. DLE notes that the non-delivery of Site 2, for example, could result in the need to divert the 'Southern Link Road' to run through sites 3 and 4. If certainty of delivery of Site 2 cannot be demonstrated by Regulation 16 stage then the 110 houses could be accommodated within the existing remaining six allocations.	These concerns are noted. The consultation responses to LNP (2018) indicate however that fears that any site in the Plan is not genuinely available are in fact groundless.
	<b>Area 1 – North-East of Lenham Village Extension</b>	
9.	Policy SHDS 1 requires the planting of a buffer some 15m wide along the A20 Ashford Road. It is suggested that this corridor should be reduced to 5m width.	The landscape setting of Site 1 is considered in the 2019 Landscape Report. It is recommended that policy SHDS1 be <b>MODIFIED</b> to incorporate the findings of the 2019 Landscape Report.
10.	Save for point (9) above DLE supports Policy SHDS1.	Noted and welcomed.

	<b>Savills (David Knight)</b>	<b>9<sup>th</sup> November 2018</b>
	<b>Consultation</b>	
1.	Wholeheartedly supports the principles of the allocation (SHD Site 3) and has been actively working with the Infrastructure Delivery Group (IDG) to assist in the deliverability of this and the other allocated sites.	Noted and Welcomed.
	<b>Design Quality – Section 4</b>	
2.	Welcomes approach to design quality but considers that 15 different house types on larger sites is too many. Suggest 8 different house types would be more appropriate.	The Plan should be <b>MODIFIED</b> so that no more than 10 types are supported.
	<b>Strategic Housing Delivery Sites</b>	
3.	Supports the suggestion within the Plan that development at south-west of Lenham Village Extension should proceed from west to east to avoid construction traffic impacting on the existing built-up area.	Further consideration has been given to the issue of phasing and how construction traffic might best be managed. The Plan should be <b>MODIFIED</b> so that it does not specify phasing details. The precise sequence whereby sites will come forward for development is not known at this stage. The Plan should, therefore, require the submission of material dealing with the routing of construction traffic (and general site management) so that this can be controlled through planning conditions.
	<b>Strategic Housing Delivery Site 3 (SHDS 3)</b>	
4.	The ownership appears to be required to give over a disproportionate amount of open space. It is accepted that some additional open space is needed to provide for an appropriate buffer to Kiln Wood Nature reserve to the south. The amount of open space suggested in the Plan is too great and will result in a net residential density which is too high for the rural location.	Agree. <b>MODIFY</b> the Plan so that 2.0 hectares of open space be provided to form a wildlife and landscape corridor to the south of the site.
5.	Accepts that play space for children and young people are key to the success of new development schemes. The size of play space requested at 0.5 hectares is excessive. Suggests a Local Equipped Area for Play (LEAP) of 400 square metres with appropriate buffers and safety fencing of 0.25 hectares would be more than sufficient.	Agreed. <b>MODIFY</b> the Plan so that a Play Area of at least 0.25 hectares is requested. The Masterplanning should allow for 0.25 hectares of Amenity Green Space to be provided. It may be that this area could be combined with the play area but to specify the two separately introduces a welcome element of flexibility into the design. The total area of open space delivered from Site 3 would therefore be 2.5 hectares.

6	Suggests that a shared play area of 0.25 hectares would be preferable to serve SHD Sites 2 and 4 combined.	Agreed. The Plan should be <b>MODIFIED</b> to show one play area of 0.25 hectares on Site 4 with an additional area of 0.25 hectare of Amenity Green Space being provided on Site 4. An area of 0.5 hectares of natural and semi-natural open space should be provided on Site 2 instead of the play area to reflect its sensitive position at the southern edge of the development.
7	Policy SHDS 3 refers to the part of the site which lies immediately to the south of Lenham Station being allocated for car parking, retail, residential and business use. Whilst the allocation is supported it is not shown on the Lenham Local Policies Plan.	Agreed. <b>MODIFY</b> the Plan to correct this error.
	<b>Strategic Housing Delivery Sites</b>	
8.	Supports the suggestion within the Plan that development at south-west of Lenham Village Extension should proceed from west to east to avoid construction traffic impacting on the existing built-up area.	Further consideration has been given to the issue of phasing and how construction traffic might best be managed. The Plan should be <b>MODIFIED</b> so that it does not specify phasing details. The precise sequence whereby sites will come forward for development is not known at this stage. The Plan should, therefore, require the submission of material dealing with the routing of construction traffic (and general site management) so that this can be controlled through planning conditions.
9.	The ownership appears to be required to give over a disproportionate amount of open space. It is accepted that some additional open space is needed to provide for an appropriate buffer to Kiln Wood Nature reserve to the south. The amount of open space suggested in the Plan is too great and will result in a net residential density which is too high for the rural location.	Agree. <b>MODIFY</b> the Plan so that 2.0 hectares of open space be provided to form a wildlife and landscape corridor to the south of the site.
10.	Accepts that play space for children and young people are key to the success of new development schemes. The size of play space requested at 0.5 hectares is excessive. Suggests a Local Equipped Area for Play (LEAP) of 400 square metres with appropriate buffers and safety fencing of 0.25 hectares would be more than sufficient.	Agreed. <b>MODIFY</b> the Plan so that a Play Area of at least 0.25 hectares is requested. The Masterplanning should allow for 0.25 hectares of Amenity Green Space to be provided. It may be that this area could be combined with the play area but to specify the two separately introduces a welcome element of flexibility into the design. The total area of open space delivered from Site 3 would therefore be 2.5 hectares.

11.	Suggests that a shared play area of 0.25 hectares would be preferable to serve SHD Sites 2 and 4 combined.	Agreed. The Plan should be <b>MODIFIED</b> to show one play area of 0.25 hectares on Site 4 with an additional area of 0.25 hectare of Amenity Green Space being provided on Site 4. An area of 0.5 hectares of natural and semi-natural open space should be provided on Site 2 instead of the play area to reflect its sensitive position at the southern edge of the development.
12.	Policy SHDS 3 refers to the part of the site which lies immediately to the south of Lenham Station being allocated for car parking, retail, residential and business use. Whilst the allocation is supported it is not shown on the Lenham Local Policies Plan.	Agreed. <b>MODIFY</b> the Plan to correct this error.

	<b>Boughton Malberbe Borough Council</b>	<b>12<sup>th</sup> November 2018</b>
1.	BMPC Chairman, Robert Turner, and Vice Chairman, Ron Galton, attended the excellent Lenham NP Consultation Day on the 6 <sup>th</sup> October and discussed various aspects of the Plan at that time.	Noted and Welcomed.
2.	There is concern amongst local residents of the impacts of increased traffic on the Headcorn Road especially at the restricted width sections at Sandway, Platts Heath and Liverton Hill. This includes commuter traffic to Headcorn station. The development proposed which will add to the requirement for additional car parking places to serve Headcorn Station.	LPC supports these comments. It rests with KCC as highway authority to consider highway improvements and MBC as planning authority to locate developments at sustainable locations which can be well served by public transport.
3.	The above highway constraints should be considered when decisions are made with regard to the routeing of construction traffic.	Agreed. The Plan should <b>MODIFIED</b> to incorporate workable proposals for the routeing of construction traffic.

	<b>CPRE Maidstone</b>	<b>14<sup>th</sup> October 2018</b>
1.	CPRE notes that the role of Neighbourhood Planning has been strengthened by the recent review of NPPF (e.g. paragraph 29). CPRE is confident that the Plan fulfils the expectations of the NPPF. CPRE fully supports the vision statement of the Plan at page 4.	Noted and Welcomed.

2.	CPRE considers it is a strength of the Plan that seven parcels of land under different ownerships are identified which should aid delivery, character and diversity of house design and tenure.	Noted and Welcomed.
3.	CPRE observes that certain parcels of land to the east of the village centre and identified in the document 'Exploration of the Broad Location Allocation at Lenham Village, Kent (May 2016) are actually not genuinely available and therefore not deliverable.	Noted.
4.	CPRE considers the active promotion of sustainable transport by site selection and design is a strength of the Plan.	Noted and Welcomed.
5.	CPRE strongly supports development of the area to the south and west of the railway station (with enhanced links to the station) which puts the promotion of sustainable transport at the heart of the Plan.	Noted and Welcomed.
6.	CPRE supports the decision of LPC not to include the site at Lenham Sandpit within the 1000 dwellings needed to deliver the broad location allocation, which decision further evidences the support for sustainable development within the Plan.	Noted and Welcomed.
7.	CPRE notes the proposed route of the extended Arriva Bus Service through the proposed development which will provide the opportunity to link various facilities with the village and minimise the need to use private cars.	Noted and Welcomed.
8.	CPRE welcomes the inclusion of cycling and walking routes within the new development areas.	Noted and Welcomed.
9.	Given that Lenham has to provide 1000 new dwellings, CPRE welcomes measures to safeguard the spring line of the Stour. This is to be achieved by keeping an area of land to the east of the village centre free from development. CPRE also welcomes the maintenance of the rural open setting of the approach to the village centre from the east along Old Ashford Road.	Noted and Welcomed.

10.	CPRE supports the location of the Strategic Housing Delivery Sites because they are located in a way which will minimise potential harm to views from the AONB.	Noted and Welcomed.
11.	CPRE supports the approach of the Plan to sustain the core centre of The Square which decision will help to retain the essential character of the village.	Noted and Welcomed.
12.	CPRE supports the approach of the Plan to extend the existing primary school rather than building a second new primary school.	Noted and Welcomed.
13.	CPRE supports the protection of land to the east of Lenham. This land has several attributes including: <ul style="list-style-type: none"> <li>• streams and wetland;</li> <li>• amenity value;</li> <li>• valuable habitat;</li> <li>• potential mitigation for surface water flooding arising from spring-fed aquifers from the North Downs.</li> </ul>	Noted and Welcomed.
14.	CPRE suggest land shown as Lenham Local Landscape Area in the Plan should be described as Landscape of Local Value to reflect designations in MBLP.	Noted. But the description of the land as a Lenham Local Landscape Area was arrived at in consultation with the Borough Council and on that basis enjoys a measure of support.
15.	The footpaths that leave the churchyard are the most used recreational paths in the village and CPRE believes this area should be identified as Local Green Space.	LPC agree with the sentiment expressed by CPRE in this representation. However, it is hard to define the extent of this area and as such it fails to meet the LGS criteria that the proposed site 'should not be an extensive tract of land'. LPC believes this land is better protected by LLLA designation.
16.	CPRE believe the Local Green Space described as "Lenham Cross", Pilgrims Way should be deleted as this land is already safeguarded by other notations, most Significantly AONB designation.	LPC agree with the sentiment expressed by CPRE in this representation. However, it is hard to define the extent of this area and as such it fails to meet the LGS criteria that the proposed site 'should not be an extensive tract of land'. LPC believes this land is better protected by LLLA designation.
17.	CPRE supports the retention of the Cricket Ground as Local Green Space. This area could become a "green lung" within the built-up area of an expanded village, serving a similar function to the recreation ground at the heart of Tenterden.	Noted and Welcomed.



18.	Lenham should be provided with additional parking to support the commercial centre of the village.	Noted and Welcomed. This is a candidate project for CIL funding.
19.	Lenham should be provided with a dedicated walkers' car park as part of the tourism initiative (Plan Policy TOU1) possibly at Hubbards Hill or the Cherry Downs picnic site.	Noted and Welcomed. This is a candidate for CIL funding.
20.	CPRE supports the creation of a new access road to the west of Lenham.	Unfortunately, the creation of a new access road to the west of Lenham is not supported by KCC, MBC or the MBLP (the development plan). In order to make the Plan policy compliant, MBC has requested that the Plan be <b>MODIFIED</b> by the deletion of reference to Tanyard Farm and this new point of access. LPC has reluctantly agreed to this request.
21.	CPRE is very impressed with the consultation process for the Plan. CPRE believes the event held on October 5 <sup>th</sup> was attended by more than 700 people.	Noted and Welcomed.
22.	CPRE supports LPC and LNPG in the work to create a Neighbourhood Plan which it believes is a demonstration of "Localism in Action".	Noted and Welcomed.

	<b>Kent County Council</b>	<b>12<sup>th</sup> November 2018</b>
	<b>Lenham Neighbourhood Plan Transport Assessment 2018</b>	
1.	KCC as Local Highway Authority is generally supportive of the approach which affords opportunities to encourage sustainable travel behaviours.	Noted and Welcomed.
2.	Consideration should be given to whether some of the proposals are primarily aimed at tackling pre-existing issues rather than what is essential to support the new development.	Agreed. The evidence base and the Plan should be <b>MODIFIED</b> to make it clear that the package of sustainable infrastructure proposals only provides what is essential to support the new development.
3.	The evidence base needs to demonstrate that the total infrastructure package can be delivered by the planned quantum of development within the Plan period.	<b>MODIFY</b> the Plan and the supporting evidence base to fully demonstrate deliverability.

4.	Detailed comments on the Transport Assessment are found in Appendix 1 to the KCC letter.	The detailed comments of KCC have been taken on board and included in the revised document Lenham Neighbourhood Plan Transportation Assessment, 2019.
	<b>What is not in the Neighbourhood Plan</b>	
5.	The Kent Minerals and Waste Local Plan 2013-31 (KMWLP) forms part of the development plan. Lenham sits on important mineral resources. A promoted site option in Lenham is included in the emerging Partial Review of the KMWLP. The Plan should therefore be revised to reflect mineral activities and safeguarding.	Not Agreed. KMWLP provides excellent coverage on this issue which does not need to be duplicated.
6.	KCC recognises and supports the emphasis in the Plan on pedestrian and cycling connectivity.	Noted and Welcomed.
7.	The Plan should make reference to the Country Council's Right of Way Improvement Plan (ROWIP) to encourage successful joint partnership and access at additional funding and opportunities.	Agreed. <b>MODIFY</b> the Plan to include reference to ROWIP.
8.	There should be a requirement in the Plan for applicants to clarify intentions to accommodate, divert or enhance any Public Right of Way (PRoW).	Agreed. <b>MODIFY</b> the Plan to include references to PRoW.
	<b>Lenham Today – The Study Area (Section 2.4)</b>	
9.	KCC has submitted an extensive urban survey project (2004) which remains a useful guide for assessing the impact of development proposals.	The urban survey is welcome and the Plan should be <b>MODIFIED</b> to incorporate the project into the evidence base.
10.	KCC records a number of important archaeological assets which have been recorded within the Parish.	The recording of heritage assets and their subsequent mitigation is considered in Policy SP18 and Policy DM4 of MBLP. The Plan should be <b>MODIFIED</b> by way of a cross-reference to these policies.
11.	KCC suggests that an Historic Landscape Characterisation analysis could be produced on a detailed case-by-case basis at Parish level as a volunteer project.	The suggested landscape characterisation analysis is welcome and the Plan should be <b>MODIFIED</b> to include the analysis as a desirable adjunct to the Plan.
	<b>Design Quality</b>	
12.	KCC supports Policy D1 on Design Quality.	Noted.

13.	KCC supports the Plan in that it seeks new development to provide for a rich movement of networks and choice of routes that incorporate active frontages.	Noted. The Plan should be <b>MODIFIED</b> to emphasise the sustainable pattern of movement proposed.
14.	KCC supports Policy D2 and requests that it be modified to include cycling access in addition to pedestrian access.	Noted. The Plan should be <b>MODIFIED</b> to incorporate clearer support for cycling access.
	<b>Promoting Active, Smarter and Sustainable Travel</b>	
15.	The inclusion of this Section is welcomed by KCC and the Council would welcome future engagement with Lenham Parish Council to consider local aspirations for sustainable access improvements.	Noted.
16.	KCC strongly supports the Active Travel policy (Policy AT1) and suggests it should include reference to the need to retain and enhance the PRow network of paths which provides valuable opportunities for active travel. This could include Community Infrastructure Levy (CIL) funded projects.	Noted. The Plan should be so <b>MODIFIED</b> to include clearer reference to the PRow network as requested by KCC as highway authority.
17.	KCC recommends that all sites of conservation interest are included within Policy GS1 to ensure their protection. KCC points out that the NPPF states that development should seek to achieve a net gain in biodiversity. Include reference to the wider PRow network and not just footpaths.	Agreed. The Plan should be so <b>MODIFIED</b> .
18.	The Plan should make specific reference to the Stour Valley Walk and the North Downs Way which has the status of a “national trail” and the potential for development to provide new path links and enhancement of promoted routes.	Agreed. The Plan should be so <b>MODIFIED</b> .
	<b>Countryside Protection</b>	
19.	KCC advise that further wording is added to Policy CP1 to ensure compliance with best practice in relation to habitat protection.	This issue is dealt with comprehensively in Policy DM3 of MBLP and a cross-reference to that policy would secure the same objective but without any overlap which could create potential confusion. The Plan should be <b>MODIFIED</b> to cross-refer to the policy guidance contained with MBLP Policy DM3.

20.	In the light of MBLP Policies SS1 and ID1, KCC request developer contributions include provision for emergency planning contingencies and to help overcome the risks arising from relative isolation and vulnerability to severe weather and highway network congestion.	The Plan be <b>MODIFIED</b> to cross-refer to the policy guidance on these issues contained within MBLP Policy ID1.
21.	In the light of paragraph 112 of the NPPF and other material, KCC suggests the Plan includes a policy ensure that new build developments should be planned to prioritise full fibre connections.	Agreed. The Plan should be so <b>MODIFIED</b> .
22.	KCC would like to ensure that reference to community facilities takes account of the sport and leisure facility requirements which may be needed to support the growth in housing and population.	Agreed. The Plan should be so <b>MODIFIED</b> .
23.	KCC supports Policy CF1 which states that facilities should provide for good walking and cycling connections.	Noted and welcomed.
	<b>Education (Section 8.4)</b>	
24.	<p>1) Planned growth within Lenham is forecast to produce significant increased demand on local school provision.</p> <p>2) There is scope at Lenham Primary School to provide a total maximum of 210 additional places.</p> <p>3) Growth at Lenham would produce 0.28 pupils per house and 0.07 pupils per flat.</p>	<p>1) In its response on the draft Plan, MBC points out that new infrastructure should be identified in the Borough Regulation 123 list with schemes outlined in the Council's Infrastructure Delivery Plan (IDP).</p> <p>2) The Borough Regulation 123 list includes 3 new primary schools to be funded through S106 planning obligations and identified in the Infrastructure Delivery Plan. None of these proposed new primary schools are located at Lenham.</p> <p>3) The IDP identifies (EDR2, page 47) the need for a One Form of Entry (1FE) expansion of either Harrietsham Primary School or Lenham Primary School at a cost of £1.77m. Housing development in Harrietsham and Lenham, in particular, will generate the need for additional primary school places.</p>

	<p>4) The KCC response to the MBLP requires sets out the requirement for a new primary school to be incorporated within the Lenham broad location for housing growth.</p> <p>5) The Parish Council's preference for Lenham Primary School to be expanded rather than commissioning a new primary should would affect the County Council's ability to deliver sufficient primary school places 'over the longer term'.</p>	<p>4) The KCC response to MBLP seeking a new primary school at Lenham is not supported or incorporated within the statutorily approved plan.</p> <p>5) MBLP Policy SP6 (1) releases 242 additional dwellings at Harrietsham.</p> <p>6) MBLP Policy SP6 (3) (ii) identifies provision of a one form of entry expansion at either Lenham or Harrietsham primary schools.</p> <p>7) MBLP Policy SP8 (1) releases 155 additional dwellings at Lenham. This release, in addition to other known commitments, makes a total of 364 committed dwellings at Lenham.</p> <p>8) MBLP Policy SP 8(4) (ii) identifies provision of a one form of entry expansion at either Lenham or Harrietsham primary schools.</p> <p>9) MBLP Policy SP 8 (6) identifies Lenham as a broad location for growth of approximately 1000 dwellings in addition to existing known commitments.</p> <p>10) There is therefore a total commitment (at October 2017) to 1606 dwellings at Harrietsham and Lenham.</p> <p>11) MBLP policy and the IDP clearly supports close interchange between Lenham and Harrietsham as regards to education provision, probably because the two settlements are located so close to each other.</p> <p>12) Most recent work on housing demand and provision supports a split of approximately 85% in favour of houses over flats (i.e. 1365 houses and 241 flats).</p>
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		<p>13) A child product of 0.28 pupils per 1365 houses produces a need for 382 additional primary school places.</p> <p>14) A child product of 0.07 pupils per 241 flats produces a need for 17 additional primary school places.</p> <p>15) The total housing growth at Lenham and Harrietsham (including 1000 dwellings at the Lenham broad location) produces a need for 399 additional primary school places.</p> <p>16) The need for 399 places is slightly less (fewer) than the provision which can be made by the planned One Form Entry growth at Harrietsham Primary School (210 places) and One Form Entry growth at Lenham Primary School (210 places).</p> <p>17) On the basis of the above analysis, it appears that KCC may be basing the request for an additional new Primary School at Lenham on the need to cater for growth 'over the longer term' i.e. beyond current commitments to 2031.</p> <p>18) LPC believes the provision of a new primary school at Lenham at this time would not meet the directly related test of planning obligations because it would go beyond what is needed to meet the known planned growth.</p> <p>19) The Plan should be <b>MODIFIED</b> to make it clear that any additional primary provision at Lenham should only be made by an expansion of Lenham Primary School within land already owned by KCC and deemed suitable for this purpose. On this basis, there is no need for the Plan to identify a site of an additional new Primary School at Lenham.</p>
	<b>Air Quality and Renewables</b>	
25.	KCC welcomes the inclusion of Policy AQ1.	Noted and welcomed.



26.	The Plan should also promote installation of decentralised and renewable energy generation.	Agreed. The Plan should be <b>MODIFIED</b> accordingly.
	<b>Strategic Housing Delivery Sites Policy SHDS1 General Requirements</b>	
27.	The Plan should provide sufficient allowance for existing drainage networks and provision for any offsite flows that may pass through proposed developments (especially Sites 2, 3, 4 and 5).	Agreed. The Plan should be <b>MODIFIED</b> accordingly.
28.	This site and its environs may contain important archaeological artefacts which will require assessment and appropriate mitigation.	Agreed. An appropriate policy for proposals affecting heritage assets is contained in MBLP Policy DM4 and it is unnecessary to seek to replicate this in the Plan.
	<b>Area 2, Site 2</b>	
29.	The site and its environs contain important heritage assets which should be considered in any development proposal.	Agreed. See comment re Area 1, Site 1 above.
30.	It is recommended that the retention and enhancement of deciduous woodland should be a priority and opportunities for the creation of new woodland and networks should be sought.	Agreed. The Plan should be <b>MODIFIED</b> to take account of this comment.
	<b>Area 2, Site 3</b>	
31.	The site may contain important heritage assets which should be considered in any development proposal.	Agreed. See comment re Area 1, Site 1 above.
32.	The site abuts Kiln Wood, an Ancient Woodland and a Local Wildlife Site (LWS). The development proposals should incorporate a buffer zone to the woodland.	Agreed. <b>MODIFY</b> the Plan to clarify the extent of the proposed buffer zone which should form a wildlife/landscape corridor.
	<b>Area 2, Site 4</b>	
33.	The site may contain important heritage assets which should be considered in any development proposal.	Agreed. See comment re Area 1, Site 1.
	<b>Area 3, Sites 5, 6 and 7</b>	
34.	The site may contain important heritage assets which should be considered in any development proposal.	Agreed. See comment re Area 1, Site 1.

35.	The site has permission for a restoration scheme which should be completed by 25 March 2019.	Noted. Further consideration of the sustainability of this site in conjunction with MBC has resulted in the conclusion that this site should be deleted by way of a <b>MODIFICATION</b> to the Plan.
	<b>13.2 Strategic Infrastructure Projects</b>	
36.	The Plan makes no specific reference to the need to secure funding to enhance the PRoW network providing links to the countryside and surrounding open space.	Agreed. The Plan should be <b>MODIFIED</b> .
	<b>13.3 Neighbourhood (or Lenham Parish Infrastructure Projects.</b>	
37.	There is growing evidence to demonstrate that physical exercise in an open green space can have a positive impact on mental health and wellbeing.	Agreed. The Plan should be <b>MODIFIED</b> to state that the existing PRoW network will be enhanced to provide significant opportunities for outdoor recreation.
38.	Research indicates that people, especially families with young children, are deterred from cycling along existing roads, due to increasing levels of vehicular traffic.	Agreed. The Plan should be <b>MODIFIED</b> to encourage the greater provision of traffic free, off-road cycle routes within the Parish.
	<b>Appendix A: Glossary</b>	
39.	KCC suggest a definition of PRoW be included within the Glossary.	Agreed. <b>MODIFY</b> the Plan to include the KCC definition of PRoW in the Glossary.
	<b>The Next Steps</b>	
40.	KCC would welcome continued engagement as the Plan progresses.	Agreed. KCC is a statutory consultee and LPC would welcome continue engagement as the Plan is made and implemented.

	<b>Russell Ownership</b>	<b>9<sup>th</sup> November 2018</b>
	<b>Ambiguity</b>	
1	The wording of the Plan is ambiguous and includes phrases such as 'where appropriate'.	The wording of the Plan aims to set out infrastructure requirements clearly whilst retaining a degree of flexibility in accordance with Government guidance. Many of the policies of Maidstone Borough Local plan contain the phrase 'where appropriate' and it is submitted that this approach is common good practice.
	<b>Bias</b>	
2	The Plan is biased towards the Knight land allowing it to be enabled and subsidised by the Russell land.	Lenham Parish Council absolutely refutes the suggestion of any bias whatsoever within the Plan.

	<b>Prescriptive</b>	
3	The Plan is overly prescriptive.	The wording of the Plan aims to set out the infrastructure requirements clearly whilst retaining a degree of flexibility in accordance with Government guidelines.
	<b>Inadequate Consultation</b>	
4	There has been suboptimal consultation between the Parish and the Russell ownership.	Lenham Parish Council absolutely refutes the allegation of suboptimal consultation in the preparation of the Plan. Representatives of the Russell ownership have attended several individual meetings with representatives of the Parish Council and the Russell ownership has been invited to all the meetings of the Infrastructure Delivery Group and indeed have attended most of these. There was an opportunity to comment on a pre-Regulation 14 draft version of the Plan afforded in 2017.
	<b>Overly ambitious Infrastructure Proposals</b>	
5	The infrastructure proposals including the Southern Link Road are over specified and excessive to serve the scale of the proposed development.	<p>The transportation package has been developed by pba in consultation with KCC and MBC. The roads proposed are development access roads which will be designed to the minimum standard necessary to serve the development proposed in the Plan.</p> <p>The Plan and its supporting documentation should be <b>MODIFIED</b> to make it clear that the transportation proposals contained are the minimum necessary to accommodate the development proposed in the Plan in a sustainable manner in accordance with government and development plan policy.</p>
	<b>Paragraph 1.6.3</b>	
6	The briefing given to pba has not been published.	Due to the financial nature of the transaction certain briefing items require commercial confidentiality.
7	The road proposals contained in the Plan exceed that necessary to serve the housing proposed south of the railway.	See comment re Paragraph 1.1.5 above.
	<b>Objection 1</b>	
8	The requirement to fund infrastructure, including that on third party land is excessive.	See comment re Paragraph 1.1.5 above.

	<b>Objection 2</b>	
9	Drawings were tabled at a late stage before a meeting at which time approval of these drawings were demanded.	The first set of drawings presented to the Infrastructure Delivery Group (IDG) were, in fact, amended at the request of several landowners.
10	The pba Transport Assessment was produced without any consultation with the Russell ownership.	See comment re Objection 2 above.
	<b>Objection 4</b>	
11	The Southern Link Road is not necessary to enable Site 4 to be connected to the village.	See comment re paragraph 1.1.5 above.
	<b>Paragraph 1.6.6</b>	
12	The AECOM report includes obligations which have been objected to on behalf of the Russell ownership.	AECOM has been asked to review its work in the context of all the representations made.
	<b>Paragraph 2.1.8</b>	
13	The roads proposed are far greater than those needed to serve 1000 dwellings.	See comment re paragraph 1.1.5 above.
	<b>Paragraph 2.2.12</b>	
14	The roads proposed are not an efficient use of land and go far beyond what is necessary.	See comment re paragraph 1.1.5 above.
	<b>Objection 6</b>	
15	The infrastructure proposals impose excessive costs and will impose landowners to enter into equalisation provisions.	See comment re paragraph 1.1.5 above.
	<b>Objection 7</b>	
16	The number of variables and sub-variables included within a development do not correlate directly with design quality (para 4.1.5)	The Neighbourhood Plan is an appropriate vehicle to encourage a local approach to design which is achieved through the approach set out in Section 4.
	<b>Paragraph 4.1.5</b>	
17	No consultation was undertaken on the above point with landowners.	The Regulation 14 Consultation Draft is the formal stage identified in Neighbourhood Plan regulations to facilitate consultation with landowners. Additional consultation with landowners. Additional consultation on certain aspects was, however, possible through the Infrastructure Delivery Group meetings which were organised and coordinated by Lenham Parish Council.

	<b>Design Guide</b>	
18	A design guide is a practical approach to securing quality design.	The suggestion of a Design Guide is helpful and landowners are welcome to explore this suggestion both individually and/or collectively. Lenham Parish Council will support and facilitate this approach through mechanisms such as the Infrastructure Delivery Group (IDG).
	<b>Objection 8</b>	
19	Landowner/developers will be required to demonstrate capability to agree Section 106 agreements to deliver roads, footways and cycleways.	See comment re paragraph 1.1.5 above.
	<b>Objection 9</b>	
20	Objection is raised to the open nature of the scope to facilitate sustainable forms of transport, such as buses, at a future date.	See comment re paragraph 1.1.5 above.
	<b>Objection 10</b>	
21	CIL will place a burden of costs on the Russell land.	See comment re paragraph 1.1.5 above.
22	The Plan is ambiguous as to what will be funded by developer contributions, what by the strategic infrastructure fund and what will be Neighbourhood (or Parish) Infrastructure Projects. Development might be stifled by excessive infrastructure demands and 'double dipping' of contributions for both CIL and S.106.	The Plan clearly states (section 13.3) what are Neighbourhood Infrastructure Projects, what is funded as Strategic Infrastructure Projects (CIL) and what will be funded via S.106 Agreements. The Plan has been the subject of a Viability Assessment by Strutt and Parker with a positive result. (See Statement of Methodology)
	<b>Policy GS1</b>	
23	1: The Policy should be more precise about the circumstances when habitat protection is needed. The Policy is too vague about what enhancing the quality of built-up area actually means.	The Plan strikes the correct balance between generality and specificity in the context of Government guidance. (See Statement of Methodology)
24	2: The desired enhancements should be specified to allow definition of projects for CIL funding.	Neighbourhood Infrastructure (Parish CIL) projects are listed in the Plan and are the subject of public consultation. (See Statement of Methodology)

	<b>Policy GS2</b>	
	<b>Objection 11</b>	
25	The amount of open space being called for from the Russell ownership is potentially excessive and disproportionate.	The open space standards with the Plan are similar to those included within MBLP but with some modification to suit local conditions and circumstances. The provisions are fully compatible with Borough and national guidelines and policies on this issue.
	<b>Objection 12</b>	
26	The parish is removing William Pitt Field (1.7 hectares) and asking SHDS to make excessive contributions. No disclosure. The Parish is asked to disclose fully the interests it has in disposing of William Pitt Field and any concessions made to other landowners and developers.	See comment re paragraph 1.1.5 above.  The Parish Council absolutely refutes any implication that undisclosed concessions have been given to any landowners or developer in relation to any matter.
	<b>Objection 13</b>	
27	The proposal for payments of £1575 per dwelling for shortfall of open space offsite has no evidence base.	The sum of £1575 is that used by Maidstone Borough Council in Section 106 negotiations and is supported by the evidence base of MBLP which has recently been the subject of an extensive public examination and approval by an independent government Inspector.
	<b>Objection 14</b>	
28	Stealth subsidisation.  The approach of asking developers and landowners to make offsite contributions to make up for any shortfall in open space does not further the principle of transparency.	See comment re objection 13 above.
	<b>Objection 15 (a)</b>	
29	(a) Index linking is unreasonable in the absence of an evidence base for the proposed charge.	(a) See comment re objection 13 above. Index linking is commonly used in Section 106 agreements and is entirely reasonable in a Plan which runs to 2031.
	(b) no index is stated.	(b) To state the index at this stage could be considered too prescriptive (see comment re paragraph 1.1.3 above).
	(c) new housing development should not have an obligation to provide electric vehicle charging points.	(c) The approach taken in the Plan fully accords with government policy on this issue.

	<b>Paragraph 11.1.9 Objection 15 (b)</b>	
30	The Russell ownership will not fund the provision of the Southern Link Road proposed in the Plan.	See the Statement of Methodology. The provision of the Southern Link Road is fundamental to the delivery of the package of sustainable transportation measures contained in the Plan, in accordance with government guidance and strategic development plan policy (MBLP Policy SP23).
	<b>Paragraph 11.1.10 Objection 16</b>	
31	The Russell ownership will not fund the provision of the Smokey Bridge Traffic Management works.	See comment re paragraph 11.1.9 above.
	<b>Paragraph 11.1.11 Objection 17</b>	
32	The Russell ownership will not fund the new railway footbridge/crossing. Such crossing is duplicated by other existing footway links.	See comment re paragraph 11.1.9 above.
	<b>Paragraph 11.1.16 Objection 18</b>	
33	The Russell ownership objects to the suggested phasing because it creates unnecessary dependencies on third party land and may impact on disposal value.	<p>As long as the proposed development is viable and deliverable the issue of the disposal value of the land is not a material planning consideration.</p> <p>The issue of phasing is considered in the Statement of Methodology. It is accepted that it is too early to be definitive on phasing at this stage. The Plan should be <b>MODIFIED</b> accordingly.</p>
	<b>Paragraph 11.1.19 Objection 19</b>	
34	The Russell land should not be hindered by the need to promote a package of sustainable transport measures securing the entire Plan but can come forward now.	See comment re paragraph 11.1.9 above.
	<b>Paragraph 11.1.20 Objection 20</b>	
35	The Russell land should not be limited in any way in its timing. Construction traffic routes can be dealt with through a traffic management plan at application stage.	<p>See comment re paragraph 11.1.16 above.</p> <p>The issue of the routing of construction traffic (and general construction site management) can be dealt with by conditions and the Plan should be <b>MODIFIED</b> to require the submission of such material at application stage.</p>



	<b>Paragraph 11.1.21 Objection 21</b>	
36	The construction of the consented scheme at the Old Goods Yard will not use up the remaining capacity on the network.	The issue of capacity on the network can be dealt with at application stage and the Plan should be <b>MODIFIED</b> accordingly.
	<b>Paragraph 11.1.22 Objection 22</b>	
37	Objection is raised on the reference to The Square being by-passed.	The Southern Link Road is not a dual carriageway or any other large-scale highway proposal. It is a form of local distributor road which is the smallest category of road possible to deliver an appropriate package of sustainable transportation proposals. The Plan should be <b>MODIFIED</b> to clarify this position.
	<b>Paragraph 11.2.1 (iv) Objection 23</b>	
38	Objection to an obligation to offer land for adoption.	Agreed. There is no need to handover land for adoption. Development proposals should make workable proposals for long-term maintenance (for example by a management company) whether the land is handed over or not and the Plan should be <b>MODIFIED</b> to require the submission of such material at application stage.
	<b>Paragraph 11.2.1 (v) Objection 24</b>	
39	An obligation to require one ownership to work with another will not work in the circumstances that the development proposals for the adjacent ownership are not yet available.	Agreed. There is no need at this stage to specify exactly what working arrangements will be needed between sites. There will be a requirement for each proposal to demonstrate workable arrangements for delivery. These should be submitted and agreed at planning application stage. The Plan should be <b>MODIFIED</b> to require the submission of workable development proposals.
	<b>Paragraph 11.2.1 (vii) Objection 25</b>	
40	The Russell land will not agree to an obligation to provide drainage and services to other sites.	Agreed. There is no requirement in the Plan to specify commercial arrangements between multiple landowners. Each proposal should demonstrate workable arrangements for delivery. These should be submitted at planning application stage. The Plan should be <b>MODIFIED</b> to require the submission of workable development proposals.

	<b>Strategic House Delivery Site 4 Objection 26</b>	
41	The land potentially has greater capacity for housing.	The Plan is based on an overall density of 30 dwellings per hectare which is regarded as appropriate for a rural area such as Lenham.
	<b>Strategic Housing Delivery Site 4 Objection 27</b>	
42	The Russell ownership objects to the provision of the Southern Link Road on its land.	See comment re paragraph 1.1.5 above.
	<b>Strategic Housing Delivery Site 4 Objection 28</b>	
43	The Russell ownership does not accept any limitation of development or cost associated with the Smokey Bridge Traffic Management Scheme.	See comment re paragraph 1.1.5 above.
	<b>Strategic Housing Delivery Site 4 Objection 29</b>	
44	The Russell ownership does not accept any limitation or cost associated with the provision of enhanced crossing facilities over the railway.	See comment re paragraph 1.1.5 above.
	<b>Strategic Housing Site 4 Objection 30</b>	
45	The Russell ownership objects to the coordinated approach of providing Southern and Western Link Roads as these provide capacity for other ownerships but not the Russell land itself.	See comment re paragraph 1.1.5 above.
	<b>Strategic Housing Delivery Site 4 Objection 31</b>	
46	The Russell ownership objects to: (a) 0.5 hectares as provision of open space for play provision for children and young people.	(a) The open space provision in the Plan builds on the approach taken in MBLP. It is considered 0.5 hectares is an appropriate amount of open space for play in this context.
	(b) lack of consultation on this issue.	(b) Details of the site were included in the 2017 version of the Plan which was subject to widespread consultation, including the potential for landowners to comment, as they have on the 2018 Plan.

	<b>Strategic housing Delivery Site 4 Objection 33</b>	
47	Objection to retaining as much of the existing frontage hedgerow as possible. This matter should be assessed at detailed landscape design stage.	The requirement to retain and enhance as much of the existing landscape structure as possible is common best practice. The approach of the Plan in this regard is fully supported by policy provisions within the NPPF and MBLP (the development plan).

	<b>Maidstone Borough Council</b>	<b>6<sup>th</sup> November 2018</b>
1.	The policies should make it clear that Maidstone Borough is the LPA responsible for approving planning applications and that Lenham Parish Council is a statutory consultee in this process.	Agreed. <b>MODIFY</b> the Plan accordingly.
2.	Because of 1. Above, phrases such as 'will not be permitted' should be replaced with 'will not be supported'.	Agreed. <b>MODIFY</b> the Plan accordingly.
	<b>Viability and Deliverability</b>	
3.	Plan needs to explain why the transport 'do something' option has been chosen over the 'do nothing' option with highway improvements at pinch points.	Agreed. <b>MODIFY</b> the Plan and its evidence base accordingly.
4.	The preferred 'do something' option appears to have been selected on the basis of addressing existing issues rather than the needs arising from development proposals.	The Plan and its evidence base should be <b>MODIFIED</b> to better explain the approach taken.
5.	The Plan needs to make clear whether expansion of the Lenham Wastewater Treatment Works is needed as a result of the proposed development.	Agreed. The Plan should be clarified by a <b>MODIFICATION</b> on this point.
6.	The Plan should identify the need for primary school education provision sufficient to meet planned growth.	Agreed. The Plan should be clarified by a <b>MODIFICATION</b> on this point.
7.	The Plan should be supported by a Viability Assessment to establish the viability of the Plan overall and the deliverability of the allocated housing sites.	Agreed. The Plan should be supported by a robust Viability Assessment.
	<b>Strategic Environment Assessment (SEA)</b>	
8.	The SEA should assess potential development sites, including those ultimately rejected.	Agreed. The SEA and the Plan should be <b>MODIFIED</b> accordingly.

	<b>Suggested Development Sites</b>	
9.	Section 12 of the Plan describes suggested development Sites but the Parish Council's position on these sites is not clear. If these sites are not supported and allocated this section should be deleted and the reasons the sites were not selected should be explained in the SEA.	Agreed. The Plan should be <b>MODIFIED</b> by deleting all sites not selected for allocation as part of the 1000 dwellings.
	<b>Community Infrastructure Levy (CIL) and Infrastructure Delivery Plan (IDP).</b>	
10.	The Plan should make it clear that infrastructure funding works as follows:	
a)	CIL is charged on new floor space and used to identify supporting infrastructure identified in the Regulation 123 list.	Agreed. The Plan should be <b>MODIFIED</b> to make the CIL process and responsibility clearer.
b)	The Regulation 123 List is underpinned by schemes identified in the Infrastructure Delivery Plan (IDP).	
c)	CIL is the primary mechanism for developers to make contributions towards infrastructure.	
d)	The Regulation 123 list must be consulted when identifying infrastructure projects.	
e)	The decision on how CIL money is spent lies with MBC, which may update its Regulation 123 list in accordance with changes to the IDP subject to public consultation.	
	<b>Section 106 Agreements</b>	
11.	Under the CIL regime S.106 Agreements are still needed to deliver affordable housing and site- specific requirements to make development acceptable in planning terms. The use of S.106 agreements lies with MBC and will be scaled back.	Agreed. The Plan should be <b>MODIFIED</b> to make the S.106 process and responsibility clearer.
	<b>Major Development Threshold</b>	
12.	A number of Plan policies apply to all developments regardless of size. For smaller proposals (e.g. one dwelling) the policy criterion should not apply. The Plan should define 'major development' and make clear which policies apply to major development only.	Agreed. The Plan should be clarified by a <b>MODIFICATION</b> on this point.

	<b>Open Space Standards</b>	
13. 1)	The Plan should make it clear whether policy GS2 is intended to replace non-strategic policy DM19 of Maidstone Borough Local Plan (MBLP).	Agreed. <b>MODIFY</b> the Plan to delete policy GS2 in favour of non-strategic policy DM19 of Maidstone Borough Local Plan (MBLP).
2)	Policy GS2 should apply to all future planning applications in Lenham Parish.	
3)	Policy GS2 does not include qualitative or accessibility standards nor does the open space calculation take account of any existing over-provision.	
	<b>Lenham Local Landscape Area</b>	
14.	The Plan would benefit from a Landscape Assessment of the Lenham Local Landscape Area (LLLA) to identify reasons for its selection. The Assessment should explain what makes the area particularly special in landscape terms. Landowners within the LLLA should be contacted and given the opportunity to comment.	Agreed. The Plan should be supported by a robust Landscape Assessment. LPC will ensure all owners within the LLLA have been contacted and are aware of the proposed designation.
	<b>Proposed Local Green Space designations.</b>	
15.	Landowners within the areas proposed as Local Green Space (LGS) should be contacted and given the opportunity to comment.	Agreed. LPC will ensure all owners within the LGS designation have been contacted and are aware of the proposed designation.
	<b>Pilgrims Way designations as Local Green Space.</b>	
16.	It is not clear why parts of the Pilgrims Way have been designated as LGS nor why the boundaries shown have been applied. These areas are protected by other designations in any event and protection of views is not a LGS criterion.	Agreed. <b>DELETE</b> the Pilgrims Way designations from the Plan.
	<b>Tanyard Farm</b>	
17.	Deletion of reference to Tanyard Farm is recommended because the site now has planning permission with approved access arrangements.	Agreed. <b>DELETE</b> reference to Tanyard Farm from the Plan.
	<b>Housing Site Allocations</b>	
18.	Further work on the viability and deliverability of allocated sites by 2031, together with supporting infrastructure, is required.	Agreed. The Plan should be supported by a robust Viability Assessment which should be supported by landowners/developers.

	<b>Lenham Local Policies Map (LLPM)</b>	
19.	The policies map should be on an OS-base plan to clearly define the boundaries of the allocations and policies.	Agreed. The policies map should be <b>MODIFIED</b> accordingly.
	<b>Error</b>	
20.	A local wildlife site and a proposed open space allocation are incorrectly shown as Local Green Space on the policies map.	Agreed. The policies map should be <b>MODIFIED</b> to correct these obvious errors.
	<b>Omissions</b>	
21.	LNP is a Parish-wide plan and the main designations in the Parish should be shown on the policies map (for example, conservation areas, local wildlife sites, ancient woodland and the SSSI).	Agreed. The policies map and the plan should be <b>MODIFIED</b> accordingly.
	<b>Gypsy and Traveller Community</b>	
22.	The plan is silent on the needs of the Gypsy and Traveller Community with no references to allocated sites within MBLP.	Agreed. Make reference to allocated Gypsy and Traveller Site early in the text of the Plan.
	<b>Drafting</b>	
23.	It would be helpful to use numbers or letters for policy criteria.	Agreed. <b>MODIFY</b> the Plan accordingly.
24.	The maps should be clearly labelled with clear titles which should reflect policies.	Agreed. <b>MODIFY</b> the Plan accordingly.
25.	A schedule is included which forms part of the MBC representation and contains 41 detailed suggestion or comments on the drafting of the Plan.	Accepted. <b>MODIFY</b> the Plan to incorporate all drafting suggestions made by MBC.

	<b>Eastwood-Towers</b>	<b>November 2018</b>
1.	The respondee (Andrew Lawrence) acts for two of the three owners. He acts for Claire Eastwood and Matthew Eastwood but not for Lorraine Towers. Claire Eastwood and Matthew Eastwood are described as 'majority landowners'. Lorraine Towers is described as a 'minority interest'.	Noted.

2.	The owners are generally agreeable to the land being included and affirm their support for the Plan.	Noted.
3.	There is no uncertainty that the land will be released for development within a reasonable timeframe.	Noted.
4.	The viability of the proposed development is uncertain in the absence of a viability assessment relating to the land. The infrastructure requirements described in LNP (September 2018) are such that these might well influence viability.	Agreed. A viability assessment has been commissioned to provide an evidence base to the Plan. The 2018 Transport Assessment supporting the Plan has been revised to clarify that the transportation infrastructure required is the minimum necessary to support the development proposed whilst meeting the basic conditions.
5.	There will need to be some agreement between the several landowners south of the railway to jointly meet development infrastructure costs. The absence of such equalisation agreements at this stage should not be regarded as material in affecting deliverability for the Plan. It is not the position that the owners refuse to permit the construction of roads through the land provided the scale of the infrastructure requested does not have an adverse impact on viability.	Agreed. The negotiation of equalisation (or any other) agreements between landowners is beyond the scope of the Plan. Following receipt of the Viability Study, Lenham Parish Council is reassured that the land will be brought forward for a viable development within the Plan period.



## **APPENDIX F**

### **SITES SUGGESTED FOR RESIDENTIAL DEVELOPMENT AND NOT SELECTED FOR ALLOCATION**

During the preparation of the Lenham Neighbourhood Plan consultation with landowners and developers lead to a number of sites being suggested for development to Lenham Parish Council. For various reasons, mostly associated with deliverability and suitability, the Parish Council did not wish to include these sites within the 1000 dwellings of the Lenham Broad Location which are shown within the Plan as the Strategic Housing Delivery Sites. The sites suggested are described here, however, with a brief analysis of the advantages and disadvantages of the proposals in planning terms, leading to a conclusion as to why each site was not regarded as suitable for inclusion as an allocation.

#### **Lenham Sandpit (Barton Willmore) 12<sup>th</sup> November 2018**

Lenham Sandpit lies to the west of Ham Lane. The Sandpit comprises two parcels of land which lie either side of the Channel Tunnel Rail Link (CTRL). The Sandpits are worked out and are not currently in use.

The Sandpit has been promoted for some time with Lenham Parish Council by the current owners as a development opportunity. A planning application for the development (reference I9/503276/OUT) was submitted on 22<sup>nd</sup> June 2019. The owners of the site propose the construction of 15 dwellings within the southern portion of the site. The dwellings would be grouped around an artificial lake created at the floor of the southern pit.

The owners propose that a significant area of open space be transferred to Lenham Parish Council or Lenham Meadows Trust to be used for recreation and nature conservation.

The site is shown as lying within a Kent County Council Minerals Safeguarding Area on the Maidstone Borough Local Plan (2017). It is believed that as a worked-out minerals site that restoration conditions apply and indeed it is believed that this restoration is currently in hand.

The advantages of developing this site are:

- 1) the site is available to provide 15 new homes including affordable/starter homes, self-build plots and a unit for groundskeeper accommodation. These dwellings would help in meeting housing requirements including for affordable, starter and self-build homes;
- 2) the provision of a wildlife nature trail area within a significant area of public open space;
- 3) positive re-use of a redundant and restored mineral working area.

The disadvantage of developing this site are:

- 1) relative remoteness from the existing retail, social and community facilities within Lenham and the new facilities proposed within Lenham Neighbourhood Plan, making this a less sustainable location for the provision of new homes leading to significant reliance on the private motor car for most day-to-day journeys, contrary to national planning policy as set out in the NPPF;
- 2) Because of the less sustainable nature of this location leading to over-reliance on the private motor car, this site is not included as a Strategic Housing Delivery Site within Lenham Neighbourhood Local Plan.
- 3) To allocate this site in Lenham Neighbourhood Plan would therefore be contrary to basic conditions (a) and (d) which require having regard to national policies and the achievement of sustainable development.

### **Little Gaynes, Faversham Road, Lenham (Country House Homes) 27<sup>th</sup> June 2017**

Little Gaynes is a large dwelling, with associated outbuildings and a builder's yard which lies to the north of the A20 Ashford Road and to the east of Faversham Road. The site forms part of a cluster of houses to the north of the A20 which lies a short distance to the north of Lenham Square. Immediately to the east of the site is the veterans war grave and war memorial.

The site lies wholly within the Area of Outstanding Natural Beauty (AONB) and is shown as such in the MBLP (2017).

The site has been promoted as a development opportunity with Lenham Parish Council. The site has the potential to deliver approximately 25 new homes. Any scheme could include a wildlife landscape corridor to the northern and eastern boundaries to seek to mitigate the impact on the AONB.

The advantages of developing this site are:

- 1) the ability to provide a mixture of new homes, including affordable homes, within a short distance of Lenham Square which is the retail and social focus of the village. These dwellings would help in meeting housing requirements, including for social housing;
- 2) the provision of a permanent wildlife landscape corridor to the east and north.

The disadvantages of developing this site are:

- 1) the impact on the Area of Outstanding Natural Beauty which would be harmful in terms of MBLP Policy SP17 (3) and national planning policy as set out in the NPPF;
- 2) the need for the occupants of the new dwellings to cross the A20 at or close to the junction with Faversham Road which has an exceptionally poor accident record.

Because of the difficulties of securing a safe pedestrian crossing of the A20 Ashford Road close to the site and the impact on the AONB this site is not included as a Strategic Housing Delivery Site within Lenham Neighbourhood Plan.

To allocate this site in Lenham Neighbourhood Plan would therefore be contrary to basic conditions (a) and (d) which require having regard to national policies and the achievement of sustainable development.

### **Inkstand Bungalow and Associated Land, Headcorn Road, Lenham (Consilium) 8<sup>th</sup> November 2018**

This site comprises the principal residence (Inkstand Bungalow), a boarding cattery, equestrian buildings and paddock and a sand school. The site lies on the east side of the Headcorn Road some 300 metres to the south of the railway line. The land between the railway line and the subject site is open agricultural land which affords attractive views toward the scarp face of the north down to the east and north-east.

The site is approximately one hectare in size. The site was the subject of a formal representation at Regulation 14 Consultation Draft Stage (dated 8<sup>th</sup> November 2018). The representation suggests the site has the capacity to deliver approximately 30-35 dwellings.

The advantages of developing this site are:

- 1) It is located at a sustainable location, close to the Railway Station;
- 2) The site has direct access onto the Headcorn Road and is served by gas, electricity, and other utilities. It is therefore available and deliverable;
- 3) The site could deliver a number of new homes of varying tenure and size and would be classified as a small to medium sized site (NPPF Feb 2019, para 68).

The disadvantages of developing this site are:

- 1) The site forms part of a larger block of open undeveloped countryside to the south of the railway and north of Oxley Wood which affords very attractive views towards the scarp face of the north downs and the AONB to the east and north-east.
- 2) The release of this site would be objectionable in itself on landscape grounds but would also put pressure on other adjacent land which would severely compromise the overall countryside setting of the village within the East Lenham Vale area of Local Valued Landscape;
- 3) The strategy of the Plan is that the west side of Lenham Road would form the long-term boundary to the built-up extent of the village to the south of the railway.

Because of the location of this site in an area of very attractive countryside poorly related to the existing built-up area of Lenham it was not selected as a site within the Plan.

To allocate this site in Lenham Neighbourhood Plan would therefore be contrary to basic conditions (a) and (d) which require having regard to national policies and the achievement of sustainable development.

### **East of Old School Close, Lenham (Four Bees Partners) 11<sup>th</sup> October 2018**

This site comprises open farmland which is located to the east of Old School Close and The Millers which front the High Street. The site lies to the south of Lenham Square and to the south of the parish church of St Mary and the Tithe Barn.

For many the unique character of Lenham arises from the fact that the countryside in the vicinity of Court Lodge Meadow penetrates right to the Square and the conservation area in the vicinity of the parish church and the Tithe Barn.

The Grade I Listed timber framed barn is believed to date from the late fourteenth century. The barn is also a scheduled ancient monument. The parish church of St. Mary has its origins in the twelfth century and is also a Grade I Listed Building. The churchyard forms an open setting for the church and contains a number of historic artefacts, many of which are listed in their own right.

The site has been promoted as a development opportunity through a formal representation at Regulation 14 Consultation Draft Stage (email dated 11<sup>th</sup> October 2018 enclosing a Lenham Concept Masterplan). The concept Masterplan proposes the release of 8.5 hectares of land immediately to the east of Old School Close for residential development. At 30 dph that land could yield some 255 dwellings. The concept Masterplan also proposes an area of informal and amenity green public open space including meadows. The total site area proposed is 17.00 hectares and so the area of open space would be some 8.5 hectares.

The representation on this land also objects to the application of the Lenham Local Landscape Area designation (now Local Valued Landscape) to any of the land in question.

The advantages of developing this site are:

- 1) The opportunity to provide a mixture of new homes close to Lenham Square which is the retail and social focus of the village;
- 2) The transfer of a significant area of land to form public open space complete with landscape enhancement and the prospect of long-term environmental management. That area of public open space includes Court Lodge Meadow which is proposed as Local Green Space in the Plan.

The disadvantages of developing this site are:

- 1) Harmful impact on the historic core of the village and its landscape setting;
- 2) Loss of an important view from Old School Close across open meadows towards the scarp face of the North Downs which is an Area of Outstanding Natural Beauty and which lies to the east and north-west;

- 3) It is by no means clear how a satisfactory form of vehicular access could be provided to this land which would both provide a safe access and have sufficient capacity to serve the development proposed.

Because of the severe adverse historic landscape, environmental and traffic impact of development at this location, this site was not included as a Strategic Housing Delivery Site within Lenham Neighbourhood Plan.

To allocate this site in Lenham Neighbourhood Plan would therefore be contrary to basic conditions (a) and (d) which require having regard to national policies and the achievement of sustainable development.

### **Land west of Old Ham Lane and South of the Railway (Peter Brazier) 4<sup>th</sup> October 2017**

This site comprises some 10 hectares (25 acres) lying immediately to the west of Old Ham Lane and immediately to the south of the railway.

The land in question therefore is bounded by allocations in the Plan which lie to the north of the railway and to the east of Old Ham Lane.

The land is heavily treed especially along the Old Ham Lane frontage. The land surrounds Lenham Court, The Lodge and The Cottage. Lenham Court is a Grade II\* Listed Building originating from the mid-fifteenth century with later additions and alterations. It is timber framed with rendered infilling and a plain tiled roof. The list description notes the property is said to have been owned by Elder and Younger Pitt. It was owned by Pitt family until the late twentieth century.

Although bounded by proposed development sites on two sides, this block of land is relatively remote from the facilities within Lenham, both existing and proposed. The land is compromised by both heritage and environmental constraints containing a Grade II\* Listed Building and significant blocks of woodland.

The advantages of developing this site are:

- 1) it could provide a significant number of new homes including affordable housing.

The disadvantages of developing this site are:

- 1) harmful impacts on important heritage assets;
- 2) harmful impact on environmental assets, including blocks of woodland and individual mature trees;
- 3) relative remoteness from existing and proposed facilities within Lenham.

Because of the heritage and environmental impacts, and its related remoteness, this site is not included as a Strategic Housing Delivery Site within the Lenham Neighbourhood Plan.

To allocate this site in the Plan would be contrary to basic conditions (a) and (d) which require having regard to national policies and the achievement of sustainable development.

## APPENDIX G

### SUMMARY OF KEY ISSUES ARISING DURING REGULATION 14 CONSULTATION AND HOW ADDRESSED

<b>1. Loss of Protected Employment Sites</b>	
<p>Maidstone Borough Council commented on the 2016 Plan that the release of land for housing at two major employment sites (Marley and Lenham Storage) would be contrary to employment protection policies in both the adopted 2000 Maidstone Local Plan and the emerging Maidstone Borough Local Plan. This would be contrary to basic condition (e).</p>	<p>Lenham Parish Council accepted this view and produced Lenham Neighbourhood Plan Pre-Regulation 14 Consultation Draft in August 2017. This Plan did not use any land in existing employment use in meeting in full the housing requirement of Maidstone Borough Local Plan (2017).</p>
<b>2. How to provide for Primary Education</b>	
<p>Consultation with Kent County Council (and Maidstone Borough Council) on this issue was ongoing from 2017 to the present day. At first Kent County Council preferred the provision of a site for a new two form entry (420 pupil) primary school within the Lenham broad location allocation of 1000 dwellings. Further work on the issue revealed that a committed one form of entry expansion at Harrietsham primary school (accommodating 210 additional pupils), together with a proposed one form of entry expansion at Lenham primary school would meet committed housing growth at both parishes together with the Lenham broad location allocation of 1000 dwellings. The site of Lenham primary school was large enough and suitably located to accommodate one form of entry expansion (accommodating 210 additional pupils). This met the necessity test (basic condition (a)) and did not go beyond what was necessary to meet the growth proposed.</p>	<p>The 2019 Plan will only show a one form entry expansion of Lenham primary school within its existing site. The option of expanding the existing primary school and not providing a new primary school was preferred by the Parish Council and supported by public consultation.</p>

<p><b>3. Are infrastructure requirements of the Plan so great as to challenge the viability of the development proposed?</b></p>	
<p>Several consultees questioned the Plan in terms of viability. The Planning Practice Guidance was changed in the Autumn of 2018 to require express consideration of viability in advance of making an allocation in a Neighbourhood Plan. In the absence of a Viability Report the Plan would not have met basic condition (a).</p>	<p>Lenham Parish Council accepted this issue and worked in consultation with the landowners of the seven allocated sites to jointly procure and fund a professional Viability Report. This Viability Study provides an important part of the evidence base to underpin the 2019 Plan.</p>
<p><b>4. Do the infrastructure requirements of the Plan go beyond what is necessary to simply secure the development proposed?</b></p>	
<p>Concern was raised in this area by Maidstone Borough Council, Kent County Council and several landowners. Lenham Parish Council accepted that the Plan needed modification in this area. During 2019 a revised Transportation Report was produced by pba. This was coupled with a paper entitled 'Community Infrastructure Levy Projects and Exclusions' dated 18<sup>th</sup> April 2019 which was agreed by Kent County Council (letter dated 13<sup>th</sup> May 2019) and shared with Maidstone Borough Council and the landowners/developers of the seven allocated housing sites. The roads which run through the development sites are to be called 'development access roads' in the Plan.</p>	<p>The final Plan will be <b>MODIFIED</b> to accept that the scope of the development access roads and their junctions with the existing highway can be determined at planning application stage. Planning conditions will be imposed on the grant of any planning permission to ensure that an appropriate network of development access roads will be in place in a timely manner sufficient to serve the development proposed and no more. The roads which run through the development sites are to be capable of accommodating a two-way bus route. These roads are also to be suitable for adoption by Kent County Council as highway authority.</p>
<p><b>5. Does the Plan deal with issues arising during construction such as the parking of contractor's vehicles and the routing of construction traffic?</b></p>	
<p>This issue was raised verbally at the Consultation Event in October 2018 and by several other local residents impacted by this issue on existing sites. The Plan does not currently address the need for a construction method statement.</p>	<p><b>MODIFY</b> the Plan to include a policy requiring the approval of a Construction Method Statement for all sites before construction commences.</p>

<b>6. Does the Plan address the need for additional commercial development and parking to serve Lenham Station?</b>	
The 2018 Plan deals with the future of Lenham Station in several different places. Because the philosophy of the Plan is to encourage sustainable patterns of transport, the Plan would be improved if it were to contain one section addressing the importance of Lenham Station in achieving this, cross referenced to other sections of the Plan as appropriate.	<b>MODIFY</b> the Plan to incorporate a section dealing solely with Lenham Station.
<b>7. Is Table 4.15 of the 2018 Plan over-prescriptive and in its current form would it encourage good design?</b>	
Most of the landowners/developers express concerns about the rigidity of Table 4.15. Lenham Parish Council accepts these concerns and the Plan will be re-drafted to allow for more flexibility in this area.	<b>MODIFY</b> paragraph 4.15 and related material in the Plan.
<b>8. Does the Plan make it clear that improvements within the Parish to facilitate active travel (walking, cycling and riding) should generally be funded through the Community Infrastructure Levy?</b>	
Lenham Parish Council accepts that the Plan could generally be improved by making it clear what is to be provided for by Section 106 Agreements and what should be funded by CIL or other similar sources of funding	<b>MODIFY</b> the Plan accordingly.
<b>9. Does the Plan properly ensure that Lenham Square will be able to function properly in 2031?</b>	
More than one local resident expressed concern over this issue. The Plan would be improved if it were to contain a section on Lenham Square explaining the Plan's vision for the Square and what measures might be available to fulfil that vision. In the Public Consultation events, projects to improve the historic environment of the Square rated highly.	<b>MODIFY</b> the Plan to include a section detailing the Plan's vision for the future of Lenham Square, cross referenced as necessary to other Sections of the Plan.



<b>10. Does the Plan properly safeguard the landscape setting of Lenham Square?</b>	
For many people the unique charm of Lenham village arises from the fact that the open countryside penetrates through the churchyard to the Square, which lies within the Conservation Area at the heart of the village. The Conservation Area contains many listed buildings, including the Grade I Listed parish church of St. Mary and the Grade I Listed barn which has survived virtually unaltered since Medieval times. The views towards these Listed Buildings, when approaching on the well-used footpath across Court Lodge Meadow, are quintessentially Lenham. The Parish Council, through its local knowledge and consultation, wishes the Neighbourhood Plan to do all it can to protect this unique element adding character to the Parish. The Parish Council believes that it is an important attribute of the Neighbourhood Plan that it should be able to contain appropriate policies to protect the very best of the Parish.	<p><b>MODIFY</b> the Plan to make Court Lodge Meadow Local Green Space.</p> <p><b>MODIFY</b> the Plan to contain a section on the importance of the Square and the opportunity presented through the Plan to promote a CIL funded project to secure environmental enhancement.</p>
<b>11. Does the Plan state the period to which it has effect?</b>	
The Plan runs to 2031. The Plan would be clearer if it were to state that the provisions run from 2017 (to accord with the adoption of MBLP) to 2031	<b>MODIFY</b> the Plan to state it runs from 2017 to 2031. Calculate housing commitments within the Plan area accordingly.
<b>12. Does the Plan adequately explain the philosophy behind the selection of the development sites and the sustainable infrastructure proposals supporting them?</b>	
This issue is fundamental to some of the concerns raised following the publication of the 2018 Plan. The Parish Council accepts that the Plan and its supporting documentation could better explain the process by which the development sites were selected.	<b>MODIFY</b> the Plan to contain a section early in the Plan itself to explain the process of site selection.

<p><b>13. Does the Plan adequately explain which other sites were considered in the site selection process and why those sites were not selected for residential allocation?</b></p>	
<p>This issue is raised on behalf of those landowners whose sites were not considered to meet the basic conditions for allocation. Consultation with Maidstone Borough indicates a view that the Plan, and the supporting documentation, could be more explicit in this area.</p>	<p><b>MODIFY</b> the Plan to contain a section in the supporting documentation which explicitly lists sites promoted for development in the consultation phase and why these sites were ruled out and not selected as allocations for residential development within the Plan.</p>
<p><b>14. Does the Plan adequately explain whether the development proposals will require an expansion to the Lenham Wastewater Treatment Works (WTW)?</b></p>	
<p>Consultation with Southern Water Services has been ongoing throughout the Plan preparation process. In response to that consultation Southern Water Services (SWS) has recently confirmed that an expansion of Lenham WTW will be included in its latest five-year infrastructure investment programme.</p>	<p><b>MODIFY</b> the Plan to explain that SWS has confirmed that expansion of Lenham WTW will be included in its current five-year infrastructure investment programme.</p>
<p><b>15. Does the Plan make proper provision for surface water drainage?</b></p>	
<p>The Plan includes policies to support proposals which make provision for sustainable urban drainage (SUDS) schemes to provide as natural a drainage solution as possible. Public consultation made it clear that protection of the headwaters of local rivers (including the Len and the Stour) was considered to be a very important local concern. It is considered that the implementation of natural SUDS schemes will serve to best protect the groundwater environment at Lenham.</p>	<p><b>MODIFY</b> the Plan to ensure that the 2019 Plan continues to contain policies supporting schemes which provide for natural surface water drainage (SUDS) so far as possible.</p>

<p><b>16. Does the Plan make proper provision for foul sewerage?</b></p>	
<p>The provision of a functioning foul sewerage system is a matter of some concern to local residents and has been consistently raised throughout the consultation process.</p> <p>Lenham Parish Council formed a group of landowners called Infrastructure Delivery Group (IDG) in 2017. That group has met with the Parish Council at 2/3 monthly intervals since then to discuss all issues to do with the Plan and associated infrastructure provision. The IDG agreed to jointly fund a Study produced by Icosa Water in June 2018 entitled 'Wastewater and Water Proposals'. In the new legal regime governing the provision of sewerage infrastructure the landowners have the option of incorporating the Icosa proposals into their development proposals. The Icosa Study allowed Lenham Parish Council to understand that a viable solution existed for foul sewerage drainage of the seven sites.</p>	<p><b>MODIFY</b> the Plan to refer to the Icosa Water Study of June 2018. This Study confirms that a viable system can be provided for the effective foul drainage of the development proposed.</p>

## APPENDIX H - LIST OF ORGANISATIONS CONSULTED

Lenham Bowls Club		Over 60s Club
Lenham Bridge Club		Lenham Allotments Ass
Lenham Brownies		Lenham Ballet School
Lenham Players		Charing Parish Council
Lenham Gardening Society		Headcorn Parish Council
1st Lenham Guides		Harrietsham Parish Council
Lenham Active Retirement Association		Boughton Malherbe Parish Council
Lenham Badminton Club		
Lenham Heritage		
Lenham Nursery School		Ulcombe Parish Councils
Harrietsham & Lenham Beavers		Wychling Parish meeting
Harrietsham & Lenham Scouts		Otterden Parish Meeting
Harrietsham & Lenham Cubs		Egerton Parish Council
Mothers Union		Rural Kent
Pilates Classes		Lenham Gardening Society
Redback Explorer Scouts		
Royal British Legion		Lenham Medical Centre
Women's Institute		Environment Agency
St Edmunds Centre Platts heath		Heath Countryside Corridor
Country Ways Quilters		Ashford Borough Council
Lenham Valley Business Association		Swale Borough Council
Heath Countryside Corridor		Maidstone Borough Council
Lenham Country Market		Helen Whately MP
Lenham Community Centre		Sue Whiteside Maidstone BC
Charing Heath Memorial Hall		James Kent Solicitors
Len Valley Practice (Doctors)		
Lenham Ballet School		Tom Sams & Janetta Sams (MBC BC)
West Kent ccg		Shellina Prendergast KCC
Lenham Football Club		Homes England
Lenham Cricket Club		Lenham Storage
Lenham Youth Club		
Lenham Primary School		R & B Plant
Platts Heath Primary School		Natural England
Lenham Nursery		
Lenham Focus		Southern Water
Lenham Social Club		South East Water
Lenham Dance Studios		DEFRA Sussex & Kent
Activate Gym		
Friends of St Marys		Highways England
The Lenham School (Swadelands)		Kent Wildlife Trust
Barton Willmore		UK Power Networks
Tim Dean Estates		BT Openreach
		Mobile Operators Association
Kent Downs AONB		Southern Gas Networks (SGN)
		Kent County Council (all departments)
Jones Homes Southern		
Historic England		
Frinted Parish Meeting		
Wormshill Parish Meeting		





