



Strategic environmental assessment for the Lenham Neighbourhood Plan

Environmental Report to accompany
the submission version of the Neighbourhood Plan

November 2019

Quality information

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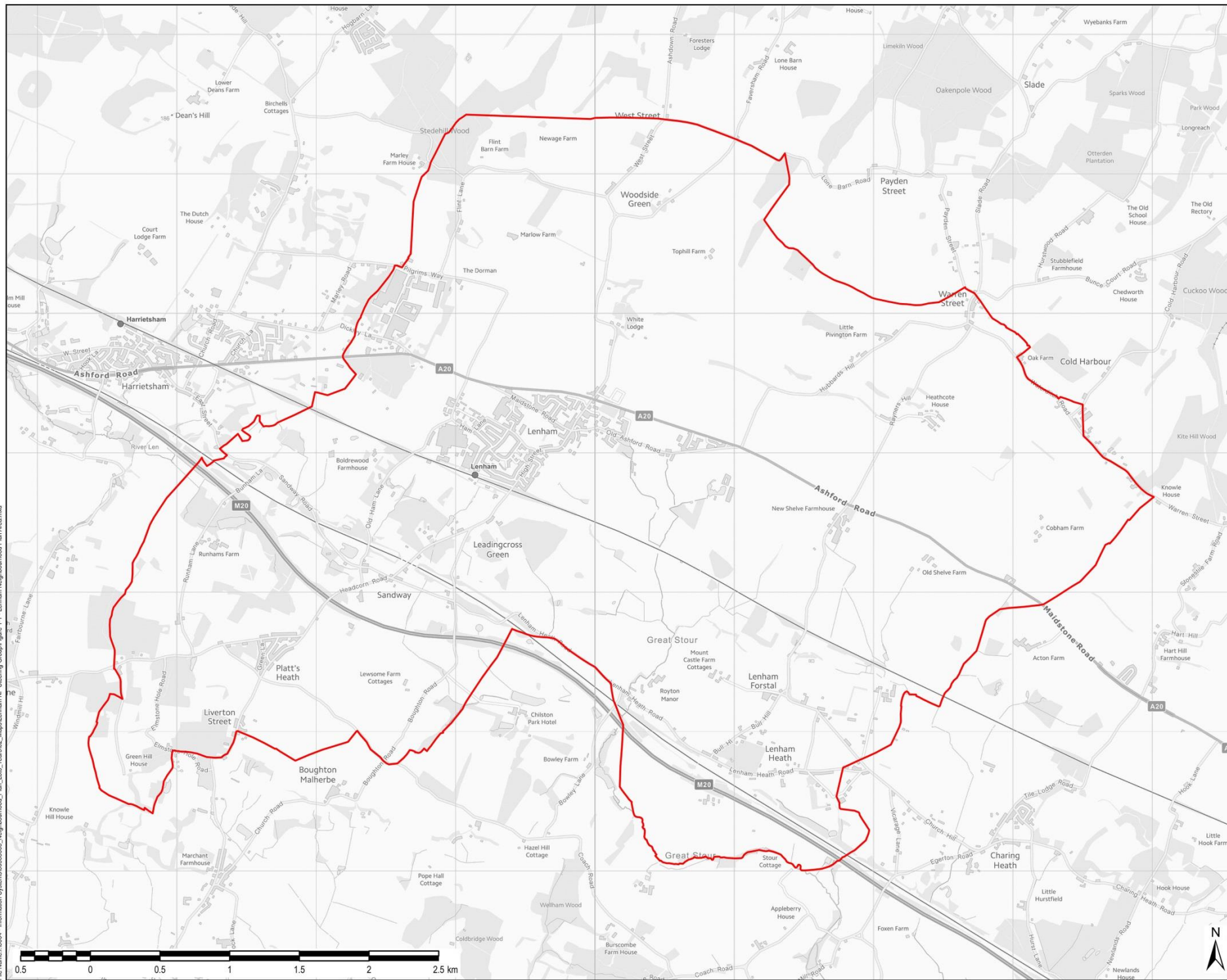
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LEGEND

Lenham Neighbourhood Plan Area

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Purpose of Issue
DRAFT

Client
**LENHAM NEIGHBOURHOOD
PLAN STEERING GROUP**

Project Title
**STRATEGIC ENVIRONMENTAL
ASSESSMENT OF THE LENHAM
NEIGHBOURHOOD PLAN**

Drawing Title
**LENHAM NEIGHBOURHOOD
PLAN AREA**

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Non-Technical Summary

What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the Lenham Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Lenham Neighbourhood Plan?

The Lenham Neighbourhood Plan presents a plan for the administrative area of Lenham Parish in Kent for the period to 2031. Prepared to be in conformity with the Maidstone Borough Local Plan, it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, housing delivery, landscape and villagescape character, the quality of life of residents and the protection and enhancement of the environment.

The Lenham Neighbourhood Plan was submitted to Maidstone Borough Council in late 2019.

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the Lenham Neighbourhood Plan, is the third document to be produced as part of the SEA process. The first document was the SEA Scoping Report (June 2017), which includes information about the Neighbourhood Plan area's environment and community. The second document was the Environmental Report (September 2018) which accompanied the Neighbourhood Plan for Regulation 14 consultation.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Lenham Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the Lenham Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the Lenham Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Lenham Neighbourhood Plan;
- The likely significant environmental effects of the current version of the Lenham Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Lenham Neighbourhood Plan; and
- The next steps for the Lenham Neighbourhood Plan and accompanying SEA process.

Assessment of alternative approaches for the Lenham Neighbourhood Plan

The Neighbourhood Plan is being prepared in the context of the Maidstone Borough Local Plan (2011-2031). Adopted on 25th October 2017, the new Local Plan replaces the Maidstone Borough Wide Local Plan (adopted in 2000) and provides a framework for development.

In relation to the Maidstone Borough Settlement Hierarchy, Lenham is designated as a 'Rural Service Centre' in the Local Plan. A Rural Service Centre is defined as a location which provides a good range of services which serve both the village and the surrounding hinterland, has a range of local employment opportunities and is well connected by public transport. The Local Plan also acknowledges that such settlements have significant landscape constraints. Within the Rural Service Centres, Policy SP5 within the Local Plan states that the Council will focus new housing and employment development when it is:

- An allocated site or broad location within the Local Plan;
- Minor development such as infilling; or
- The redevelopment of previously development land that is of a scale appropriate to the size of the village.

Significantly, as set out in Policy SP8 of the Local Plan, land in Lenham is identified as a broad location for growth for the delivery of approximately 1,000 dwellings towards the end of the Local Plan period (post April 2021). The Local Plan also states that housing site allocations and associated infrastructure meeting this requirement will be made through the Lenham Neighbourhood Plan or, if this is not taken forward, through the Local Plan review to be adopted by April 2021.

To facilitate the development of a Neighbourhood Plan development strategy to deliver these indicative numbers, the Neighbourhood Plan Steering Group was keen to consider alternative locations for delivering housing in the parish. In light of this, the Neighbourhood Plan Steering Group considered where broadly in the parish such development should go.

To support decision making on this element of the Local Plan, the SEA process has considered three sets of options as reasonable alternatives. These are described below

Options relating to the Kent Downs AONB

During the development of the Neighbourhood Plan, the Neighbourhood Plan Steering Group considered different strategic approaches to guiding development in the plan area. A central consideration was the extent to which the main landscape designation present within the Neighbourhood Plan area, the Kent Downs AONB, should be a key determinant as to the location of new development.

In this context, two options were through the SEA process, as follows:

- **Option 1:** Delivery of the Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a broad area strategy which includes the AONB; and
- **Option 2:** Delivery of the Local Plan's housing allocation for the Lenham Neighbourhood Plan area through limiting potential locations to those outside of the AONB.

Table 4.1 in the Environmental Report presents the findings of the appraisal of Option 1 and Option 2 outlined above. In response to the SEA findings, consultation responses and further studies undertaken through the Neighbourhood Plan, the current version of the Neighbourhood Plan does not seek to take forward development within the AONB. This is due to a recognition of the importance of the nationally designated landscape for the setting and character of the Neighbourhood Plan area.

Options relating to broad location of development in the parish

A further element the Neighbourhood Plan Steering Group was keen to consider was, where, in the parts of the Neighbourhood Plan area outside of the AONB, development should take place. This related to whether development should take place exclusively within the vicinity of Lenham village, or whether development should also be directed to the smaller hamlets in the Neighbourhood Plan area, such as Platts Heath, Lenham Heath, Sandway and Lenham Forstal.

To support the consideration of these potential spatial strategies, two options were considered, as follows:

- **Option 1:** Delivery of the Maidstone Borough Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a spatial strategy which limits development to the vicinity of Lenham village.
- **Option 2:** Delivery of the Maidstone Borough Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a dispersed spatial strategy.

Table 4.2 in the Environmental Report presents the findings of the appraisal of Option 1 and Option 2 outlined above. To reflect consultation responses received during earlier stages of the Neighbourhood Plan's development process, the findings of technical studies, and the SEA findings presented above, the Neighbourhood Plan Steering Group took forward a spatial strategy which would focus new development in the vicinity of Lenham village rather than other locations within the Neighbourhood Plan area. This was with a view to supporting the local educational, employment, medical, retail, recreational and social facilities located in the village and maximising access to these facilities.

Options relating to potential areas of growth in the vicinity of Lenham village

Following the decision to locate new development in the vicinity of Lenham village, a number of 'potential areas of growth' were then considered around the village. This was with a view to examining potential locations for housing growth in the vicinity of Lenham village (outside of the AONB) in locations close enough to be within potential walking or cycling range of existing village facilities.

The potential areas of growth (or PAGs) were as follows:

- PAG1: Land North of the A20 Ashford Road, East of Marley Works and West of the AONB
- PAG2: Land South of the A20, East of Dickley Wood, North of the Railway and West of Lenham Village
- PAG3: Land South of the Railway and West of Ham Lane
- PAG4: Land South of the Railway, West of Headcorn Road, North of Kiln Wood and East of Ham Lane
- PAG5: Land South of the Railway, East of Headcorn Road and North of Oxley Wood
- PAG6: Land North of the Railway, East of Lenham Village and South of the A20 Ashford Road
- PAG7: Land South of Ashmills Business Park and West of East Lenham

To support the consideration of the suitability of these PAGs, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise from new development. **Tables 4.3 to 4.9** in the main body of the Environmental Report present the findings of the appraisals. In response to these findings, the current version of the Neighbourhood Plan allocates seven sites for housing across three of the potential areas of growth. These are as follows:

North-East of Lenham Village Extension

- Site 1 – Land South of Old Ashford Rd

The area covered by the site corresponds with Potential Area of Growth (PAG) 7 considered above.

South-West of Lenham Village Extension

- Site 2 – Land West of Headcorn Rd and North of Leadingcross Green
- Site 3 – Land East of Old Ham Lane and South of the Railway
- Site 4 – Land West of Headcorn Rd and South of the Old Goods Yard

The area covered by these three sites corresponds with PAG4 considered above.

North-West of Lenham Village Extension

- Site 5 – Land West of Old Ham Lane and North of the Railway
- Site 6 – William Pitt Field
- Site 7 – Land West of Loder Close

The area covered by these three sites corresponds with PAG2 considered above.

Assessment of the current version of the Lenham Neighbourhood Plan

The submission version of the Lenham Neighbourhood Plan presents 33 planning policies for guiding development in the Lenham area.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the Lenham Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following sustainability themes:

- Biodiversity;
- Climate change;
- Landscape and the historic environment
- Land, soil and water resources
- Population and community;
- Health and wellbeing; and
- Transportation.

The assessment has concluded that the submission version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the taking forward of provisions to effectively accommodate and manage the large scale of growth required in the village through the Local Plan, whilst supporting the vitality of the village and the quality of life of residents. They also relate to the Neighbourhood Plan's close focus on enhancing green infrastructure provision and promoting healthier lifestyles. In addition, through a close focus on supporting the accessibility of residents, reducing the need to travel and promoting sustainable transport use, the Neighbourhood Plan will bring significant positive effects in relation to the 'Transportation' theme.

The proposed policy provisions within the Neighbourhood Plan are also considered likely to lead to positive effects in relation to the Landscape and Historic Environment theme. These relate to the plan's close focus on protecting landscape and villagescape character, including relating to the setting of the Kent Downs AONB, initiating high quality design and the incorporation of high quality green infrastructure networks within new development areas. The Neighbourhood Plan also has a focus on conserving the fabric and setting of the historic environment. Positive effects are also anticipated relating to the 'Biodiversity and Geodiversity' theme through a focus on protecting existing habitats, enhancing ecological linkages, and initiating biodiversity-friendly design and layout. As such, in relation to these themes, the Neighbourhood Plan will help ensure that the potential impacts on landscape character, the historic environment and ecological networks from the scale of new development required in the Neighbourhood Plan area will be limited, and where possible, enhancements secured.

Significant permanent and long term negative effects have been identified in relation to the 'Land, Soil and Water Resources' SEA theme. This relates to the loss of the best and most versatile agricultural land as a result of Neighbourhood Plan allocations. However, this should be considered against the inevitable loss of land required to deliver the Local Plan housing allocation for the parish, and the limited opportunities for associated development to take place on previously developed land.

Next steps

This Environmental Report accompanies the Lenham Neighbourhood Plan for submission to the Local Planning Authority, Maidstone Borough Council, for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Maidstone Local Plan.

If Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Maidstone Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Lenham Neighbourhood Plan will become part of the development plan for Lenham Parish.

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Lenham Neighbourhood Plan.
- 1.2 The Lenham Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan area, which covers Lenham Parish in Kent (Figure 1.1), is being prepared in the context of Maidstone Borough Council's Local Plan.
- 1.3 Key information relating to the Lenham Neighbourhood Plan is presented in Table 1.1.

Table 1.1: Key facts relating to the Lenham Neighbourhood Plan

Name of Responsible Authority	Lenham Parish Council
Title of Plan	Lenham Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Lenham Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the adopted Maidstone Borough Local Plan.</p> <p>The Lenham Neighbourhood Plan will be used to guide and shape development within the Lenham Neighbourhood Plan area.</p>
Timescale	To 2031
Area covered by the plan	The Neighbourhood Plan area covers the parish of Lenham in Kent (Figure 1.1)
Summary of content	The Lenham Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Mike Cockett, Lenham Neighbourhood Plan Group Email address: mikethemac@me.com

SEA explained

- 1.4 The Lenham Neighbourhood Plan has been screened in as requiring an SEA.
- 1.5 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the Lenham Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.6 The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹.
- 1.7 The SEA Regulations require that a report is published alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.8 In line with the SEA Regulations this Environmental Report must essentially answer four questions:
 - What is the scope of the SEA?
 - What has plan-making/SEA involved up to this point?

¹ Directive 2001/42/EC

- 'Reasonable alternatives' must have been appraised for the plan.
 - What are the appraisal findings at this stage?
 - I.e. in relation to the draft plan.
 - What happens next?
- 1.9 These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SEA questions.

Structure of this Environmental Report

- 1.10 This document is the Environmental Report for the Lenham Neighbourhood Plan and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory² requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ³
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What is the sustainability 'context'?	<ul style="list-style-type: none"> The relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What are the key issues & objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan
What happens next?	<ul style="list-style-type: none"> The next steps for plan making/SEA process.

² Environmental Assessment of Plans and Programmes Regulations 2004

³ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the Lenham Neighbourhood Plan

Local Plan context for the Lenham Neighbourhood Plan

- 2.1 The Lenham Neighbourhood Plan is being prepared in the context of the adopted Maidstone Borough Local Plan. Neighbourhood plans will form part of the development plan for the borough, alongside, but not as a replacement for the Local Plan. The Local Plan seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward. Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Maidstone Borough, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.2 The new Maidstone Borough Local Plan, which was adopted in October 2017 and replaced the Maidstone Borough Wide Local Plan (adopted in 2000), provides a framework for development to 2031.
- 2.3 Lenham is designated as a 'Rural Service Centre' in the Local Plan. A Rural Service Centre is defined as a location which provides a good range of services which serve both the village and the surrounding hinterland, has a range of local employment opportunities and is well connected by public transport. The Local Plan also acknowledges that such settlements have significant landscape constraints.
- 2.4 In terms of development, the Local Plan sets out the following for Lenham:
- Allocation of 145 homes at Tanyard Farm, Old Ashford Road, Lenham;
 - Allocation of 10 dwellings at Glebe Gardens, Lenham; and
 - Lenham Storage, Lenham is designated as an Economic Development Area for use classes B1, B2 and B8.
 - The Marley Works site is designated as an Economic Development Area for use classes B1, B2 and B8.
 - Ashmills Business Park, Lenham is designated as an Economic Development Area for use classes B1, B2 and B8.
- 2.5 Significantly, the Lenham Neighbourhood Plan area is also identified as a broad location for in the region of 1,000 dwellings towards the end of the Local Plan period (post 2021). The Local Plan states that housing site allocations and associated infrastructure meeting this requirement will be made through the Lenham Neighbourhood Plan or through the Local Plan review to be adopted by April 2021.

Vision for the Lenham Neighbourhood Plan

- 2.6 The vision for the Lenham Neighbourhood Plan which was developed during earlier stages of plan development, is as follows:

“Protect the heritage features of Lenham village and the hamlets of the Parish, and their setting in relation to the AONB, and the rural parts of the Parish, while allowing appropriate growth”

- 2.7 To support the Neighbourhood Plan's vision, the Lenham Neighbourhood Plan sets out a number of Neighbourhood Plan policies. The latest iteration of these policies has been appraised in Chapter 5 of this Environmental Report.

3. The Scope of the SEA

SEA Scoping Report

- 3.1 The SEA Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁴ These authorities were consulted on the scope of the Neighbourhood Plan SEA in June 2017
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Baseline information (including the context review and baseline data) is presented in **Appendix A**.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1**.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Natural England (Lisa Frost, Lead Adviser, Sussex & Kent Team)	
<p>Generally the policies deal reasonably with matters relating to the natural environment. However, I would recommend that the following points are also addressed:</p> <p>The following environmental constraints need to be considered in relation to specific site policies:</p> <ol style="list-style-type: none"> 1. Potential impact on the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB) – Policies SHDS 2, 3, 4 and 8. 2. Loss of ‘best and most versatile agricultural land’ (BMV) (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system). Our records suggest that this site probably includes BMV soils. If soil surveys confirm this and use of an alternative, non-BMV soil site is not possible, then best practice will need to be followed with regards to soil handling, etc. Detailed guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks) and we recommend that this is followed. – Policy SHDS 2. 3. Protection of Denner’s Shaw which is Priority Habitat (Deciduous woodland) - Policy SHDS 5. 	<ol style="list-style-type: none"> 1. Noted, this element is considered within the SEA framework under the Landscape and Historic Environment theme and associated assessment questions. 2. Noted, this element is considered within the SEA framework under the Land, Soil and Water Resources theme and associated assessment questions. 3. The biodiversity assessment questions within the SEA framework have been updated to reflect this comment.

⁴ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme’.

Consultation response	How the response was considered and addressed
<p>Thank you for consulting Natural England on the SEA Scoping report for Lenham Neighbourhood Plan.</p> <p>I note we have previously commented on the Lenham Neighbourhood Plan and as those comments still remain valid, I have copied them below.</p> <p>The following environmental constraints should be included in Policy CP1 as they might be relevant in relation to windfall sites:</p> <ol style="list-style-type: none"> 1. Potential impact on the Lenham Quarry Site of Special Scientific Interest (SSSI). 2. Potential loss of or damage to Priority Habitats and irreplaceable habitats (including ancient woodland). The Plan should commit to preserving irreplaceable habitats and ensuring developers follow Natural England's standing advice https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences 3. Loss of BMV soils. 4. Potential visual impact on the setting of the Kent Downs AONB. 	<p>Comments fed back to Neighbourhood Group.</p> <p>These elements will be considered through the SEA process.</p>
<p>We support the use of brownfield sites. However, it should be noted that brownfield site may nevertheless support biodiversity, including protected species. Where it is known or suspected that potential allocations are used by protected species, reference to the need for appropriate surveys should be made to inform of any constraints or requirement that may apply to development. In addition, reference should be made in the plan to the need for similar appropriate surveys of windfall sites, known/likely to be used by protected species, prior to determination of planning applications, to inform any decision.</p>	<p>Comments fed back to Neighbourhood Group.</p> <p>These elements will be considered through the SEA process.</p>
<p>Historic England (Alan Byrne, Historic Environment Planning Advisor)</p>	
<p>We are content that the scoping report for Lenham NDP adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p>	<p>Noted</p>
<p>Environment Agency (Samantha Watts, Planning Advisor, Sustainable Places)</p>	
<p>The majority of Lenham Parish is underlain by bedrock that is classed as Principle Aquifer due to the large quantities of water they can yield for supply and the Environment Agency's national policy concerning groundwater protection. Around half of the Parish also falls within catchment areas of Source Protection Zones (SPZ 3). These areas have been designated to protect larger groundwater abstractions such as public water supply boreholes in the area. The majority of water supplied to the Parish by South East Water will be groundwater sourced from these boreholes.</p> <p>It is important that these aquifers are protected and careful consideration is needed to ensure developments do not cause pollution from, for example, storage and use of hazardous substances, inappropriate drainage or land contamination. Where contamination is suspected as result of previous land use we will require land contamination assessment and if necessary remediation to be carried out.</p> <p>Any new development must not be capable of meeting the legal definition of Contaminated Land under Part 2A of the Environment Protection Act 1990. This is in line with the National Planning Policy Framework. Please note that pollution prevention is key during and after any development</p>	<p>Noted, the elements discussed are considered within the SEA framework under the 'Land, Soil and Water Resources' theme and associated assessment questions.</p>
<p>We note that the Scoping Report has covered green and blue infrastructure within document, and we support this. The Report positively states that green infrastructure will be used as part of planning for 'ecological networks'. We also note that biodiversity, habitats and species have been identified and prioritised within the plan.</p>	<p>Noted.</p>

Consultation response

How the response was considered and addressed

We are pleased to note that the WFD has been highlighted within the Scoping Report and emphasis has been made on the importance of water quality in the area. Lenham Parish area falls within 2 major water bodies - The Len and the Upper Great Stour as you have identified with the Report.

Noted. These elements will be considered through the SEA process.

The WFD applies to all surface water bodies, including lakes, streams and rivers as well as groundwater. The overall aim of the WFD is for all water bodies to reach good status by 2027, this means improving their physical state and preventing deterioration in water quality and ecology

The WFD introduced the concept of integrated river basin management and such plans should influence development plans. The Parish of Lenham lies within the South East River Basin District. The current RBMPs that were published on 18 February 2016 following public consultation: <https://www.gov.uk/government/publications/south-east-river-basinmanagement-plan>

There is a legal requirement to improve and restore water bodies to reach their ecological potential or status. The requirements of the WFD are as important as the requirements of Habitats Directive. We would encourage all neighbourhood plans to steer site operators/developers so they can do their part to protect and improve our water bodies in accordance with the requirements of the WFD as part of their overall project.

Key Sustainability Issues

- 3.5 Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SEA. These issues are as follows, presented by eight SEA Themes. In the absence of any significant or tangible issues, two of these SEA Themes have been scoped out for the purposes of the SEA process:

Air quality

- Air quality in the Neighbourhood Plan area is good, with no significant issues identified.
 - There are no Air Quality Management Areas (AQMAs) within the Neighbourhood Plan area, with the nearest AQMA covering Maidstone, approximately 12km to the west of the Neighbourhood Plan area.
 - Housing and employment growth have the potential to increase emissions and reduce air quality in the area; however air pollution is at a low baseline so likely effects are less likely to be significant.
- 3.6 Due to the absence of any significant air quality issues within the Neighbourhood Plan area, **air quality was scoped out for the purposes of the SEA process.**

Biodiversity

- There is one nationally designated site located within the Neighbourhood Plan area: the Lenham Quarry Site of Special Scientific Interest (SSSI). A very small part of the Neighbourhood Plan area is located within the Impact Risk Zone (IRZ) for the SSSI.
- Locally important wildlife sites feature within the Neighbourhood Plan area, including the Kiln Wood Local Nature Reserve.
- There is a network of Ancient and Semi-Natural Woodlands located within the Neighbourhood Plan area, including Dickley Wood, Oxley Wood, Dunstall Wood, Lower Wood, Gascoyne Wood, Affers Wood, Butts Bank, Lade Wood and Kiln Wood
- There are numerous Biodiversity Action Plan priority habitats present in the Neighbourhood Plan area.

Climate Change

- An increase in the built footprint of the Lenham Neighbourhood Plan area (associated with the delivery of new housing and employment) has the potential to increase overall greenhouse gas emissions.
- Whilst fluvial flood risk is not an issue for the Neighbourhood Plan area, some locations are at risk of surface water flooding. Some locations have also experience sewerage flooding.
- The Lenham Neighbourhood Plan should seek to increase the Neighbourhood Plan area's resilience to the effects of climate change by supporting and encouraging adaptation strategies.

Landscape and Historic Environment

- The northern section of the Neighbourhood Plan area is located within the boundary of the Kent Downs AONB.
- The Neighbourhood Plan area has a diverse landscape, with a number of landscape character types present.
- The Neighbourhood Plan area has a rich and diverse historic environment, including numerous Grade I and Grade II* listed buildings and four conservation areas.
- Lenham Elmstone Hole Conservation Area is considered to be in 'poor condition' with a medium vulnerability to further deterioration.
- Future development in the Neighbourhood Plan area has the potential to lead to pressures on designated and non-designated sites of historic environment interest, villagescapes and landscapes, including from the loss of key built and natural features.

Land, Soil and Water Resources

- Land classified as the Best and Most Versatile Agricultural Land is present in parts of the Neighbourhood Plan area.
- Groundwater Source Protection Zone 3 is present in the Neighbourhood Plan area and the area is covered by a Nitrate Vulnerable Zone.

Population and Community

- Whilst the population grew at a lower rate than the borough as a whole and regionally and nationally between 2001 to 2011, significant housing growth has been earmarked for the Neighbourhood Plan area in the period to 2031.
- Population growth in the Neighbourhood Plan area will place pressures on existing services and facilities.
- A larger number of residents within the Neighbourhood Plan area are within the older age categories (45-59 and 60+) in comparison to the regional and national averages.
- The population of the Neighbourhood Plan area is ageing, potentially placing increased pressures on local health services and facilities.

Health and Wellbeing

- The majority of residents within the Neighbourhood Plan area consider themselves to have 'very good health' or 'good health', broadly aligning to the totals for Maidstone Borough, the South East of England, and England.
- The main priority areas within the Joint Health and Wellbeing Strategy for Kent link to preventing ill health, supporting residents with mental health and dementia, enhancing the quality of life for residents with long term health issues and ensuring that every child has the best start in life.

Transportation

- Residents within the Neighbourhood Plan area have access to Lenham Station, with hourly services direct to London Victoria, Canterbury West and Ashford International.
- As of October 2017, the principal bus route through the Neighbourhood Plan area is the 10X connecting residents to the local towns and villages of Ashford, Charing, Harrietsham and Maidstone. There are regular daily services between 07:00 and 18:00, roughly every hour.
- The Neighbourhood Plan area is well linked to the national road network, including via the M20 and the A20.
- Residents have access to a number of footpaths and cycle routes, including the North Downs Way, Stour Valley Walk and National Cycle Network Route 17.
- Over 87% of residents within the Neighbourhood Plan area have access to a car or van, perhaps in part due to the fact that Lenham is an affluent area within a rural setting.
- There is a need for continued enhancement to public transport in the Neighbourhood Plan area.

SEA Framework

- 3.7 The issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the Neighbourhood Plan is presented below, excluding the SEA Themes which have been scoped out.

Table 3.2: SEA Framework for the Lenham Neighbourhood Plan

SEA Objective	Assessment questions
Biodiversity and Geodiversity	
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the status of the nationally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary, including the Lenham Quarry SSSI? • Support the status of the locally designated sites of significance within and/or adjacent to the Neighbourhood Plan area boundary, including the Kiln Wood Nature Reserve and the network of ancient and semi-natural woodlands? • Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species (with specific regard to Denner's Shaw)? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate Change	
Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Limit the number of journeys made? • Limit the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?

SEA Objective	Assessment questions
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Landscape and Historic Environment	
Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest? • Conserve and enhance the Chilston Historic Park and the four conservation areas, including Lenham Elmstone Hall, Lenham Liverton Street, Lenham, and Sandway? • Support the integrity of the historic setting of key buildings and scheduled monuments of cultural heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment?
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the Kent Downs AONB • Support the integrity of local landscape character? • Conserve and enhance landscape and townscape features?
Population and Community	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the development of a range of high quality, accessible community facilities? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents?
Reduce deprivation and promote a more inclusive and self-contained community.	<ul style="list-style-type: none"> • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Support the provision of land for allotments and cemeteries?
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Health and Wellbeing	
Improve the health and wellbeing residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Align to the key outcomes outlined in the Joint Health and Wellbeing Strategy? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Reduce noise pollution? • Promote the use of healthier modes of travel? • Improve access to the countryside for recreational use?

SEA Objective	Assessment questions
Transportation	
Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure enhancements? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents from the road network?

4. What has plan making / SEA involved to this point?

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the Lenham Neighbourhood Plan has been informed by an assessment of alternative locations for development in the Neighbourhood Plan area.

Overview of plan making / SEA work undertaken since (date)

- 4.3 Plan-making for the Lenham Neighbourhood Plan has been underway since 2014. Initial work incorporated a number of informal and formal consultation exercises carried out by the Neighbourhood Plan Steering Group, including on the scope of the Neighbourhood Plan.
- 4.4 A significant number of consultation events have since been carried out for the Neighbourhood Plan. This has included public meetings, questionnaires, workshops and others.
- 4.5 The following sections discuss the evolution of the development strategy for the Neighbourhood Plan in association with the SEA process.

Assessment of reasonable alternatives for the Neighbourhood Plan

- 4.6 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Lenham Neighbourhood Plan. The SEA Regulations⁵ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.
- 4.7 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for proposed development. Specifically, this chapter explains how the Lenham Neighbourhood Plan's development strategy has been shaped through considering alternative approaches for the location for development in the Neighbourhood Plan area.

Options considered as reasonable alternatives

- 4.8 The Neighbourhood Plan is being prepared in the context of the Maidstone Borough Local Plan (2011-2031). Adopted on 25th October 2017, the new Local Plan replaces the Maidstone Borough Wide Local Plan (adopted in 2000) and provides a framework for development.
- 4.9 In relation to the Maidstone Borough Settlement Hierarchy, Lenham is designated as a 'Rural Service Centre' in the Local Plan. A Rural Service Centre is defined as a location which provides a good range of services which serve both the village and the surrounding hinterland, has a range of local employment opportunities and is well connected by public transport. The Local Plan also acknowledges that such settlements have significant landscape constraints. Within the Rural Service Centres, Policy SP5 within the Local Plan states that the Council will focus new housing and employment development when it is:

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

- An allocated site or broad location within the Local Plan;
 - Minor development such as infilling; or
 - The redevelopment of previously development land that is of a scale appropriate to the size of the village.
- 4.10 Significantly, as set out in Policy SP8 of the Local Plan, land in Lenham is identified as a broad location for growth for the delivery of approximately 1,000 dwellings towards the end of the Local Plan period (post April 2021). The Local Plan also states that housing site allocations and associated infrastructure meeting this requirement will be made through the Lenham Neighbourhood Plan or, if this is not taken forward, through the Local Plan review to be adopted by April 2021.
- 4.11 To facilitate the development of a Neighbourhood Plan development strategy to deliver these indicative numbers, the Neighbourhood Plan Steering Group was keen to consider alternative locations for delivering housing in the parish. In light of this, the Neighbourhood Plan Steering Group considered where broadly in the parish such development should go.
- 4.12 To support decision making on this element of the Local Plan, the SEA process has considered three sets of options as reasonable alternatives, as follows:
- Options relating to the Kent Downs AONB
 - Options relating to broad location of development in the parish; and
 - Options relating to potential areas of growth in the vicinity of Lenham village
- 4.13 A description of the options considered, and findings of the assessment of the options, is presented below.

Options relating to development within the Kent Downs AONB

- 4.14 During the development of the Neighbourhood Plan, the Neighbourhood Plan Steering Group considered different strategic approaches to guiding development in the plan area. A central consideration was the extent to which the main landscape designation present within the Neighbourhood Plan area, the Kent Downs AONB, should be a key determinant as to the location of new development.
- 4.15 In this context, two options were considered, as follows:
- **Option 1:** Delivery of the Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a broad area strategy which includes the AONB; and
 - **Option 2:** Delivery of the Local Plan's housing allocation for the Lenham Neighbourhood Plan area through limiting potential locations to those outside of the AONB.
- 4.16 These broad options have been appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). These were considered through the SEA Framework of objectives and assessment questions developed during scoping and the options have been ranked in terms of their sustainability performance against the relevant SEA Theme.
- 4.17 The appraisal findings are presented in the table below.

Table 4.1: Assessment of options relating to development within the Kent Downs AONB

Option 1: Delivery of the Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a broad area strategy which includes the AONB

Option 2: Delivery of the Local Plan's housing allocation for the Lenham Neighbourhood Plan area through limiting potential locations to those outside of the AONB.

SEA Theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity and Geodiversity	<p>In terms of effects on national designated biodiversity sites, the Lenham Quarry SSSI is located within the AONB. However, given it is a geological SSSI, the Impact Risk Zone for the SSSI (which covers all planning applications) covers a relatively small 50m radius of the SSSI. As such, potential effects on the SSSI can be readily avoided. Therefore the delivery of housing through Option 1 is unlikely to lead to an elevated likelihood of effects to this nationally designated site.</p> <p>More broadly, Option 2, through delivering the Local Plan's housing allocations within a more limited area has the potential to lead to an increased magnitude of localised effects on individual biodiversity assets within the areas located outside of the AONB. This includes the Kiln Wood Local Wildlife Site and the variety of BAP Priority Habitats present in the area. However, Option 1 has increased potential to have effects on the key features of biodiversity value within the AONB.</p> <p>In this context both options have the potential to have significant impacts on biodiversity assets if they are located inappropriately and have poor design and layout. Likewise both options have the potential to promote net gains in biodiversity value. For both options therefore, potential effects on biodiversity depend on aspects such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features within design.</p>	?	?
Climate Change	<p>In relation to climate change mitigation, depending on where within the AONB development takes place, Option 1 is likely to encourage a distribution strategy which promotes development over a wider geographic area, including in less accessible, more rural locations away from the local public transport network. This is likely to encourage car use and result in an increase in greenhouse gas emissions. Option 2 has the potential to direct development to more accessible locations, including locations close to the railway station. This will help reduce the need to travel to key services, facilities and public transport links.</p> <p>In terms of the quality and energy efficiency of construction, this depends on the design and layout of new development areas. However it is considered that the constraints imposed by the AONB designation would do more to limit scope for the incorporation of renewable energy provision within new development areas.</p> <p>With regards to the flood risk within the Neighbourhood Plan area, there are areas of land surrounding the tributaries of the River Len and the Great Stour which have issues relating to flooding. Whilst Option 2 has some increased potential to lead to development in flood zones, or elevated levels of flood risk, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. Likewise, adherence to the recommendations and guidance presented in the Strategic Flood Risk Assessment (SFRA) undertaken to inform the Local Plan will help limit effects. Alongside, areas affected by fluvial flood risk are relatively limited in the Neighbourhood Plan area. As such there is little to differentiate the two options in this regard.</p>	2	1
Landscape and Historic Environment	<p>Option 2, by precluding development within the AONB, will help limit the potential effects of new housing delivery on this nationally designated landscape. In contrast, through enabling development within the AONB, Option 1 has increased potential to impact on landscape character within the AONB. In regards to the historic environment, both options have the potential to impact on designated heritage assets in Lenham village and within the hamlets of the Neighbourhood Plan area. In this context the significance of the effects from each option on features of cultural, built and archaeological heritage assets depends on the location, scale and nature of development. There is however increased potential for the historic setting of Lenham village in relation to the Kent Downs to be impacted through Option 1.</p>	2	1

Option 1: Delivery of the Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a broad area strategy which includes the AONB

Option 2: Delivery of the Local Plan's housing allocation for the Lenham Neighbourhood Plan area through limiting potential locations to those outside of the AONB.

SEA Theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Land, Soil and Water Resources	In relation to the location of the Best and Most Versatile Agricultural Land, the majority of the undeveloped areas of the Neighbourhood Plan area are underlain by Grade 2 (good) or Grade 3 (good to moderate) agricultural land, based on Natural England's Regional Agricultural Land Classification Map for London and the South East. Given both options have the potential to lead to the best and most versatile agricultural land, it is not possible to differentiate between the options in this regard. In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution.	?	?
Population and Community	Option 1 is likely to encourage a distribution strategy which promotes development over a wider geographic area, including in less accessible, rural locations away from Lenham village. This may limit accessibility to existing services and facilities. In this context Option 2 has increased potential to concentrate the provision of housing in locations that allow easier access to a range of local services and facilities available (including in Lenham village and the three key employment sites). Similarly Option 2 has the potential to lead to an increased level of housing provision taking place in locations which are well connected and integrated with the main settlement within the Neighbourhood Plan area, Lenham. This will do more to support the vitality and viability of the village, including through supporting local shops and amenities.	2	1
Health and Wellbeing	Option 2 is more likely to lead to housing provision which is located in closer proximity to the centre of Lenham. This is likely to support the development of housing at locations which are more easily accessible to existing services, facilities and amenities, including the Len Valley medical practice and leisure facilities. This will also support healthier modes of travel (including walking and cycling) and encourage more active lifestyles. Both options will enable access to open countryside and the public rights of way network.	2	1
Transportation	Option 2 has increased potential to support the provision of housing in locations that allow easier access to the range of local services and facilities present in the Rural Service Centre of Lenham. The option also increases potential for development to take place at locations with good proximity to Lenham railway station, which is located to the south of the village, away from the AONB. In contrast Option 1 is likely to encourage a distribution strategy which promotes development over a wider geographic area, including in less accessible, rural locations away from the main population centres of the plan area. This is likely to encourage car use and limit accessibility to existing services and facilities.	2	1

Options relating to broad location of development in the Neighbourhood Plan area

- 4.18 In response to the findings above, consultation responses and further studies being undertaken through the Neighbourhood Plan, the current version of the Neighbourhood Plan does not seek to take forward development within the AONB. This is due to a recognition of the importance of the nationally designated landscape for the setting and character of the Neighbourhood Plan area.
- 4.19 A further element the Neighbourhood Plan Steering Group was keen to consider was, where, in the parts of the Neighbourhood Plan area outside of the AONB, development should take place. This related to whether development should take place exclusively within the vicinity of Lenham village, or whether development should also be directed to the smaller hamlets in the Neighbourhood Plan area, such as Platts Heath, Lenham Heath, Sandway and Lenham Forstal.
- 4.20 To support the consideration of these potential spatial strategies, two options were considered, as follows:

- **Option 1:** Delivery of the Maidstone Borough Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a spatial strategy which limits development to the vicinity of Lenham village.
 - **Option 2:** Delivery of the Maidstone Borough Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a dispersed spatial strategy.
- 4.21 These options were appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). These were considered through the SEA Framework of objectives and assessment questions developed during scoping and the options have been ranked in terms of their sustainability performance against the relevant SEA Theme.
- 4.22 The appraisal findings are presented in the table below.

Table 4.2: Assessment of options relating to the broad location of development

Option 1: Delivery of the Maidstone Borough Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a spatial strategy which limits development to the vicinity of Lenham village

Option 2: Delivery of the Maidstone Borough Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a dispersed spatial strategy

SEA Theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity and Geodiversity	<p>Option 1, through delivering the Local Plan's housing allocations within a limited area, has the potential to lead to an increased magnitude of localised effects on individual biodiversity assets in the vicinity of Lenham village. This includes the Kiln Wood Local Wildlife Site and the variety of BAP Priority Habitats present in the area. However, Option 2 has increased potential to have effects on the key features of biodiversity value elsewhere in the Neighbourhood Plan area.</p> <p>In this context both options have the potential to have significant impacts on biodiversity assets if development areas are located inappropriately and have poor design and layout. Likewise, both options have the potential to promote net gains in biodiversity value. In this context, for both options, potential effects on biodiversity depend on aspects such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features within design.</p>	?	?
Climate Change	<p>In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the Neighbourhood Plan area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. In this context Option 1 has the potential to direct development to more accessible locations in the Neighbourhood Plan area, including locations close to the railway station and in proximity to the amenities of Lenham village. This will help reduce the need to travel to key services, facilities and public transport links. In contrast, Option 2 is likely to encourage a distribution strategy which promotes development over a wider area, including in less accessible locations away from the key services and facilities in Lenham village and key public transport networks. As such, dispersing development to the hamlets of Platts Heath, Lenham Heath, Sandway and Lenham Forstal through Option 2 is likely to lead to an increase in the need to travel for services and facilities. This will do more to encourage car use and result in an increase in greenhouse gas emissions from transport.</p> <p>Whilst both options have the potential to lead to development in areas of elevated levels of flood risk, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. For example, the NPPF does not permit development within flood risk areas or where the effect would be to increase flood risk elsewhere without appropriate mitigation measures. Likewise, adherence to the recommendations and guidance presented in the Strategic Flood Risk Assessment (SFRA) undertaken for the wider borough will help limit effects.</p>	1	2
Landscape and Historic Environment	<p>Both options have the potential to lead to impacts on the setting of the AONB. Option 1, through directing development to the vicinity of Lenham village, the northern part of which is in close proximity to the AONB, has the potential to lead to impacts on the setting of this nationally designated landscape. However, development facilitated through Option 1 to the south of Lenham village is less likely to have significant impacts on landscape character or views to and from the AONB. Similarly, the facilitation of development in the eastern part of the parish through Option 2 also has the potential to lead to impacts on the setting of the AONB; however development in the south of the parish facilitated through the option is less likely to lead to impacts on the setting of the AONB.</p> <p>More broadly in terms of Option 1, the option has increased potential to lead to impacts on landscape character and the setting of the historic environment in the vicinity of Lenham village. However the option will also help limit impacts on landscape character and the historic environment elsewhere in the Neighbourhood Plan area, and Option 2 may lead to increased impacts on the setting of the historic environment and landscape character in the vicinities of Platts Heath, Lenham Heath, Sandway and Lenham Forstal.</p> <p>Overall therefore, it is not possible to differentiate between the options in terms of impacts on landscape character and the setting and fabric of the historic environment as this depends on the detailed location, scale and nature of development.</p>	?	?

Option 1: Delivery of the Maidstone Borough Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a spatial strategy which limits development to the vicinity of Lenham village

Option 2: Delivery of the Maidstone Borough Local Plan's housing allocation for the Lenham Neighbourhood Plan area through a dispersed spatial strategy

SEA Theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Land, Soil and Water Resources	<p>In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution.</p> <p>In relation to the location of the Best and Most Versatile Agricultural Land, the majority of the undeveloped areas of the Neighbourhood Plan area are underlain by Grade 2 (good) or Grade 3 (good to moderate) agricultural land. Given both options have the potential to lead to development on the best and most versatile agricultural land; it is not possible to differentiate between the options in this regard.</p>	?	?
Population and Community	<p>Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. Lenham village has by far the broadest range of services and facilities in the Neighbourhood Plan area. These include a selection of shops, primary and secondary schooling, a health centre, a community centre, good public transport links and leisure facilities.</p> <p>In this context Option 1, through focusing housing in the settlement with the broadest range of amenities, will do more to promote the location of new housing in accessible locations. This will help limit the need for residents to travel for day-to-day services and facilities, supporting their quality of life.</p> <p>In terms of housing numbers, both of the options will meet the relevant Local Plan requirement for the parish, and will, given the size of the likely allocations, facilitate affordable housing within allocations.</p>	1	2
Health and Wellbeing	<p>Directing development through Option 1 to Lenham village will enhance accessibility through directing housing to the settlement with the broadest range of services and facilities. It will also enhance accessibility to local medical facilities in Lenham. This will have benefits for the health and wellbeing of residents.</p> <p>Locating housing in closer proximity to the facilities available in Lenham village will also support residents' quality of life and wellbeing through promoting walking and cycling and active lifestyles.</p>		
Transportation	<p>Option 1 will direct housing growth to the location with the broadest range of services and facilities and best public transport links. This will help reduce the need to travel to key services, facilities and public transport networks and encourage the use of walking and cycling as alternative modes of transport to the private car.</p> <p>In contrast, Option 2 is likely to encourage a distribution strategy which promotes development over a wider area, including in less accessible locations away from the key services and facilities in Lenham village and key public transport links. As such, dispersing development to the hamlets of Platts Heath, Lenham Heath, Sandway and Lenham Forstal through Option 2, which have a limited range of amenities, is likely to lead to an increase in the need to travel for services and facilities. This is likely to encourage car use.</p>	1	2

Options relating to potential areas of growth in the vicinity of Lenham village

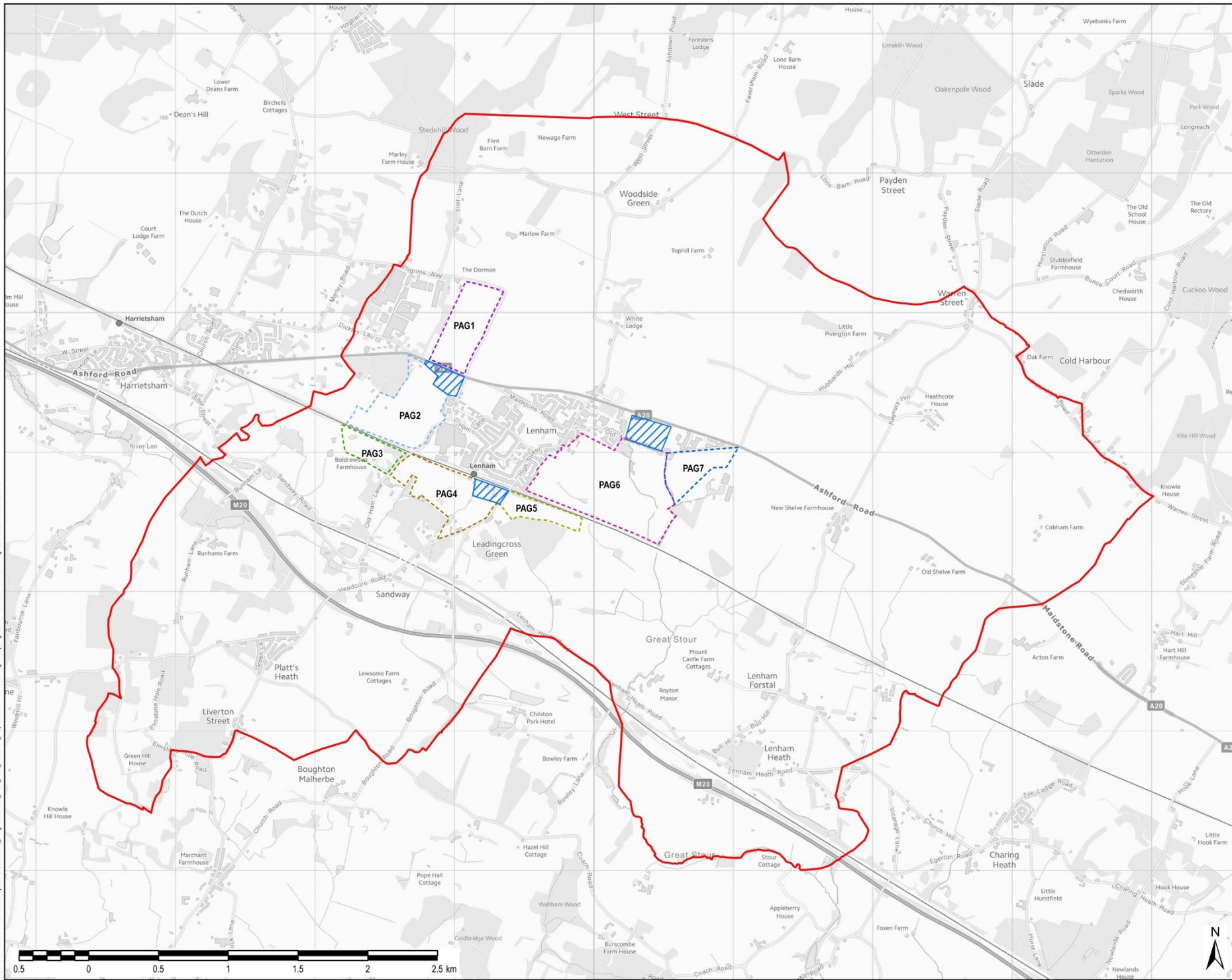
- 4.23 To reflect consultation responses received during the Neighbourhood Plan's development process, the findings of technical studies, and the SEA findings presented above, the Neighbourhood Plan Steering Group took forward a spatial strategy which would focus new development in the vicinity of Lenham village rather than other locations within the Neighbourhood Plan area. This was with a view to supporting the local educational, employment, medical, retail, recreational and social facilities located in the village and maximising access to these facilities.
- 4.24 In response to this, a number of 'potential areas of growth' were then considered in the vicinity of Lenham village. This was with a view to examining potential locations for housing growth in the vicinity of Lenham village (outside of the AONB) in locations close enough to be within potential walking or cycling range of existing village facilities.
- 4.25 The potential areas of growth (or PAGs) were as follows:

- Land North of the A20 Ashford Road, East of Marley Works and West of the AONB
 - Land South of the A20, East of Dickley Wood, North of the Railway and West of Lenham Village
 - Land South of the Railway and West of Ham Lane
 - Land South of the Railway, West of Headcorn Road, North of Kiln Wood and East of Ham Lane
 - Land South of the Railway, East of Headcorn Road and North of Oxley Wood
 - Land North of the Railway, East of Lenham Village and South of the A20 Ashford Road
 - Land South of Ashmills Business Park and West of East Lenham
- 4.26 Figure 4.1 below shows the locations of the PAGs in conjunction with the wider Neighbourhood Plan area, with Figure 4.2 outlining the key biodiversity, landscape and historic environmental designations located within and within close proximity of the PAGs.
- 4.27 The indicative housing capacity for each of the PAGs has been calculated utilising the methodology outlined below.
- 4.28 In terms of housing density, the methodology assumes a density of 30 dwellings per hectare (dph) for all sites. This figure does not necessarily equate to the amount of land that is suitable for development, as, for larger sites, land needs to be allocated for non-housing uses, for example community facilities and open space (the net development area).
- 4.29 To address this, the methodology provides ratios to calculate the net housing density based on the size of sites. The approach is based on the notion that: the bigger the site, the more land that needs to be put over for non-housing uses. The ratios are provided below.

Area	Gross to net ratio standards	Net Housing Density
Up to 0.4 ha	90%	30
0.4 ha to 2 ha	80%	30
Over 2 ha	75%	30
Over 10 ha	50%	30

- 4.30 The Google Earth measuring tool was used to calculate the size of each PAG, in the absence of any clearly identifiable sizes present within the Strategic Housing and Economic Development Land Availability Assessment (SHEDLAA)⁶ which was completed in 2016. Notably, part of the boundaries of PAG2, PAG3 and PAG6 overlap with either an 'accepted' or 'rejected' housing, employment or mixed use sites. Further details are provided in the 'population and community' section of the corresponding tables below.
- 4.31 Tables 4.3 to 4.7 below present the key environmental constraints present at each of the sites and potential effects that may arise from new development. In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping and the baseline information, and findings presented in relation to the seven SEA Themes to provide an indication of each site's sustainability performance.

⁶ Maidstone Borough Council (2016): 'Strategic Housing and Economic Development Land Availability Assessment', [online] available to download via: <<http://www.maidstone.gov.uk/residents/planning/local-plan/evidence>> last accessed [12/01/17]



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LEGEND

- Lenham Neighbourhood Plan Area
- Sites Permitted for Housing
- Potential Areas of Growth (PAG)**
 - PAG1: Land North of the A20 Ashford Road, East of Marley Works and West of the AONB
 - PAG2: Land South of the A20, East of Dickey Wood, North of the Railway and West of Lenham Village
 - PAG3: Land South of the Railway and West of Ham Lane
 - PAG4: Land South of the Railway, West of Headcorn Road, North of Klin Wood and East of Ham Lane
 - PAG5: Land South of the Railway, East of Headcorn Road and North of Oxley Wood
 - PAG6: Land North of the Railway, East of Lenham Village and South of the A20 Ashford Road
 - PAG7: Land South of Ashmills Business Park and West of East Lenham

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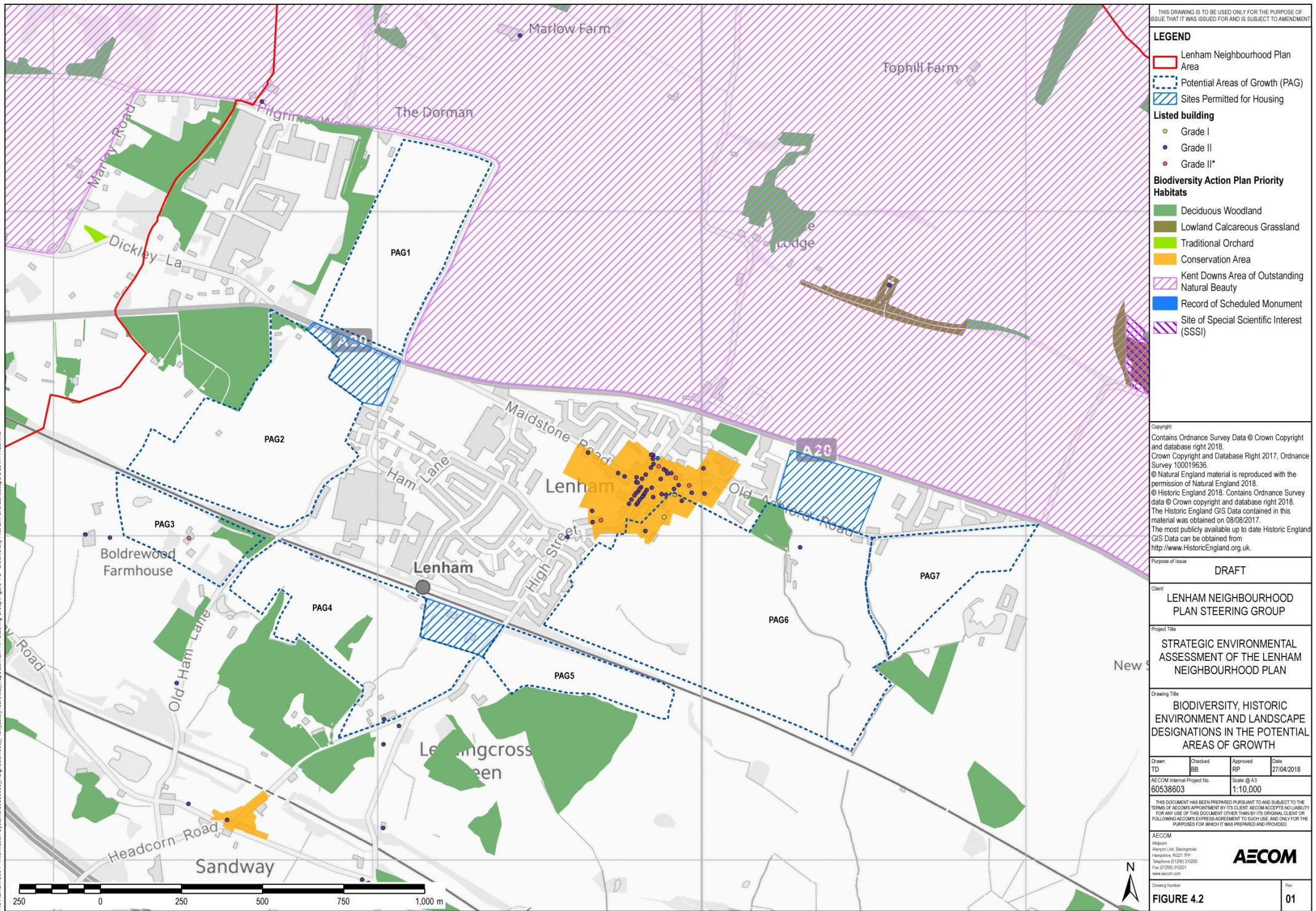
Purpose of Issue
DRAFT

Client
LENHAM NEIGHBOURHOOD PLAN STEERING GROUP

Project Title
STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE LENHAM NEIGHBOURHOOD PLAN

Drawing Title
POTENTIAL AREAS OF GROWTH IN THE NEIGHBOURHOOD PLAN AREA

Drawn TD	Checked BB	Approved RP	Date 11/01/2018
AECOM Internal Project No 60538603		Scale @ A3 1:25,000	
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<p>AECOM Midpoint Amporn Ltd, Beaingtable Hampshire, RG21 7TP Telephone 01262 310200 Fax 01262 310201 www.aecom.com</p> <p>AECOM</p>			
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LEGEND

- Lenham Neighbourhood Plan Area
- Potential Areas of Growth (PAG)
- Sites Permitted for Housing

Listed building

- Grade I
- Grade II
- Grade II*

Biodiversity Action Plan Priority Habitats

- Deciduous Woodland
- Lowland Calcareous Grassland
- Traditional Orchard
- Conservation Area
- Kent Downs Area of Outstanding Natural Beauty
- Record of Scheduled Monument
- Site of Special Scientific Interest (SSSI)

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Purpose of Issue: DRAFT

Client: LENHAM NEIGHBOURHOOD PLAN STEERING GROUP

Project Title: STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE LENHAM NEIGHBOURHOOD PLAN

Drawing Title: BIODIVERSITY, HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS IN THE POTENTIAL AREAS OF GROWTH

Drawn: TD	Checked: BB	Approved: RP	Date: 27/04/2018
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Rev: 01

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Table 4.3: PAG1 'Land North of the A20 Ashford Road, East of Marley Works and West of the AONB'



Site size: 18.68ha (approximate)

Biodiversity and Geodiversity	<p>The PAG is not within a SSSI Impact Risk Zone for the type and scale of development potentially to be taken forward. Therefore, development is unlikely to have any significant impacts on any SSSI designations if housing is delivered in this location.</p> <p>The PAG comprises agricultural land which is periodically used for arable farming. As such, it does not comprise habitats suitable for protected species, with the Maidstone Landscape Capacity Study: Sensitivity Assessment (January 2015)⁷ stating that the intensive arable production within the 'Harrietsham to Lenham Vale' Landscape Character Area (LCA) weakens opportunities for wildlife. However, the LCS does state that woodland blocks and interlinking hedgerows provide good connectivity.</p> <p>There are patches of Deciduous Woodland BAP Priority Habitat located directly to the west and south west of the PAG, including Dickey Wood ancient and semi-natural woodland. Linkages between these assets should be enhanced where possible through new development proposals, and appropriate buffer zones implemented.</p>	
Climatic factors	<p>In relation to adapting to the effects of climate change, the PAG is not located within identified flood risk zones for fluvial flooding; the site is located entirely within Flood Zone 1. Land towards the south western corner of the PAG is within an area at risk of surface water flooding. However, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.</p> <p>The PAG is located within relative proximity to the Lenham Secondary School, the Marley Works employment area and the services and facilities of Lenham village centre. As such, it is considered that development within the PAG will support a limitation of emissions from transport.</p>	
Landscape and historic environment	<p>The Kent Downs AONB is located directly to the north and east of the PAG. There are direct views into the PAG from the North Downs Way/Pilgrim's Way, which passes along the northern boundary of the site and into the AONB. Additionally, the PAG currently contributes to the 'green gap' between the settlements of Lenham and Harrietsham, with the green gap an important determinant in maintaining the distinctiveness of these two settlements.</p> <p>The southern half of the PAG is located within the 'Harrietsham to Lenham Vale' LCA. The Maidstone Landscape Capacity Study (LCS): Sensitivity Assessment (January 2015) states that the pattern of woodlands, hedgerows and the mosaic like field pattern is very distinctive within the LCA. As such, the LCA is classified as having 'moderate landscape sensitivity'.</p> <p>The LCS also states that visibility is high within and from the LCA, with some long views of the Downs from the northern area and open views across the landscape to the south of the Pilgrim's Way. As such, the LCA is classified as having 'high visual sensitivity'. However, the Marley Works employment site is recognised as a significant visual detractor.</p> <p>The PAG does not contain and is not within the setting of any nationally or locally designated heritage assets.</p>	
Land, Soil and Water Resources	<p>The PAG is underlain by Grade 2 (very good) and Grade 3 (good to moderate) agricultural land. In the absence of a detailed agricultural land classification assessment, it is not possible to determine whether any areas of Best and Most Versatile Agricultural Land are located within the PAG. However, as the PAG is periodically used for arable farming, development would differ from its existing land use.</p> <p>The entirety of the PAG is within a sensitive groundwater location.</p>	

⁷ Maidstone Borough Council (2015): 'Maidstone Landscape Capacity Study: Sensitivity Assessment (January 2015)', [online] available to download via: <<http://www.maidstone.gov.uk/residents/planning/local-plan/evidence>> last accessed [11/01/17]

Population and community	<p>Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. The Rural Service Centre of Lenham has a secondary school, primary school, a variety of amenity open spaces, a convenience store, community centre, health centre and village church, which will limit the need for residents to travel for day-to-day services and facilities. Additionally, there are two employment sites within walking/cycling distance to the PAG.</p> <p>The PAG could potentially deliver up to 280 dwellings, contributing to the local housing requirements for Lenham. Development on the site would result in the loss of an established agricultural field which is providing a local economic benefit.</p>	
Health and wellbeing	<p>Supporting the health and wellbeing of residents, the site is located within good proximity to local services and facilities in Lenham village. With these amenities accessible on foot, an allocation of housing at this location will support healthier and more active lifestyles.</p> <p>Health and wellbeing will be supported by the site's proximity to the North Downs Way (which extends eastwards from the site into the AONB) and the variety of amenity open spaces within Lenham, including a cricket ground, allotment gardens and a playing field.</p>	
Transportation	<p>Access into the south eastern section of the PAG is achievable via a turning from the A20, at Pilgrim's Way; however the road network will need to be extended and widened to accommodate new development. Additionally, a crossing point would need to be created across the A20 in order to reduce the potential safety issues associated with crossing the road on foot and also to increase the accessibility of the PAG from the main settlement.</p> <p>The PAG is accessible by frequent public transport links, particularly the number 10X bus service which connects residents to the neighbouring settlements of Ashford, Charing, Harrietsham and Maidstone. Lenham Railway Station is approximately 1km to the south.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.4: PAG2 'Land South of the A20, East of Dickley Wood, North of the Railway and West of Lenham Village'



Site size: 24.20ha (approximate)

Biodiversity and Geodiversity	<p>In regards to national designations, the PAG is not within a SSSI Impact Risk Zone for the type and scale of development potentially to be taken forward. Therefore, development is unlikely to have any significant impacts to any SSSI designations if housing is delivered in this location.</p> <p>The PAG comprises agricultural land which is periodically used for arable farming. As such, it does not comprise significant habitats suitable for protected species.</p> <p>There is a patch of Deciduous Woodland BAP Priority Habitat located in the north western corner of the PAG. The patch adjoins to the Dickley Wood ancient and semi-natural woodland which borders a section of the western boundary of the PAG. Enhancements in ecological linkages to these locations should be secured and buffer zones implemented if development is taken forward at this location.</p>	
Climatic factors	<p>In relation to adapting to the effects of climate change, the PAG is not located within identified flood risk zones for fluvial flooding; the site is located entirely within Flood Zone 1.</p> <p>There is a corridor of land passing through the central section of the PAG, extending from Ashford Road (northern PAG boundary) to the railway line (southern PAG boundary) which is within an area at risk of surface water flooding. However, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.</p> <p>The PAG is located within relative proximity to the Lenham Secondary School, the Lenham village centre and employment areas. As such, it is considered that development within the PAG will support a limitation of emissions from transport.</p>	
Landscape and historic environment	<p>From a landscape perspective, the PAG is not located within or adjacent to the boundaries of the Kent Downs AONB. However, the PAG currently contributes to the 'green gap' between the settlements of Lenham and Harrietsham, with the green gap an important determinant in maintaining the distinctiveness of these two settlements.</p> <p>As stated within the Maidstone LCS, the PAG is located within the 'Harrietsham to Lenham Vale' LCA. The LCA is classified as having a 'medium landscape sensitivity' and 'high visual sensitivity' to change. The PAG does not contain and is not within the setting of any nationally or locally designated heritage assets.</p>	
Land, Soil and Water Resources	<p>The PAG is underlain by Grade 2 (very good) agricultural land. As such, development at this location would lead to the loss of land classified as the Best and Most Versatile Agricultural Land.</p>	
Population and community	<p>Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. The Rural Service Centre of Lenham has a secondary school, primary school, a variety of amenity open spaces, a convenience store, community centre, health surgery and village church, which will limit the need for residents to travel for day-to-day services and facilities. Additionally, there are two employment sites within walking/cycling distance to the PAG.</p> <p>In reference to the SHEDLAA, the majority of the PAG has been accepted for future housing provisions. The SHEDLAA outlines two sites within the PAG which have the potential to deliver a total allocation of 440 dwellings: 400 dwellings at HO3-202 (Land off Old Ham Lane) and 40 dwellings at HO3-195 (Land r/o Loder Close).</p>	
Health and wellbeing	<p>Supporting the health and wellbeing of residents, the site is located within good proximity to local services and facilities in the Rural Service Centre of Lenham. With these amenities accessible on foot, an allocation of housing at this location will support healthier and more active lifestyles.</p> <p>Health and wellbeing will be supported by the site's proximity to the variety of amenity open spaces within Lenham, including a cricket ground, allotment gardens and a playing field.</p>	

Transportation	In terms of accessing the PAG, there is the potential to extend the existing road network to create an entry point into the north eastern section of the PAG, via Ham Lane. The PAG is accessible by frequent public transport links, particularly the number 10X bus service which connects residents to the neighbouring settlements of Ashford, Charing, Harrietsham and Maidstone. Lenham Railway Station is approximately 1km to the east.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

Table 4.5: PAG3 'Land South of the Railway and West of Ham Lane'



Site size: 8.00ha (approximate)

Biodiversity and Geodiversity	<p>The PAG is not within a SSSI Impact Risk Zone for the type and scale of development potentially to be taken forward. Therefore, development is unlikely to have any significant impacts to any SSSI designations if housing is delivered in this location.</p> <p>From an ecological perspective, there is an area of Deciduous Woodland BAP Priority Habitat located in the north eastern corner of the PAG and a pond located towards the north western corner of the site. It is possible that these habitats could potentially be suitable for protected species, and as such, development proposals should seek to protect and enhance these assets where possible.</p>	
Climatic factors	<p>In relation to adapting to the effects of climate change, the PAG is not located within identified flood risk zones for fluvial flooding; the site is located entirely within Flood Zone 1.</p> <p>There is a corridor of land passing through the north western section of the PAG (including the pond) which is within an area at risk of surface water flooding. However, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.</p> <p>The PAG is located within relative proximity to the Lenham Secondary School, the Lenham village centre and employment areas, and the railway station. As such, it is considered that development within the PAG will support a limitation of emissions from transport.</p>	
Landscape and historic environment	<p>In regards to landscape designations, the PAG is not located within the boundary or within the setting of the Kent Downs AONB.</p> <p>The PAG is located within the 'Harrietsham to Lenham Vale' LCA. As stated within the Maidstone LCS, the LCA is classified as having a 'medium landscape sensitivity' and 'high visual sensitivity' to change. 'Lenham Court' is a Grade II* listed building located within the boundaries of the PAG. The heritage asset is not located within the 2017 Heritage at Risk Register for the South East⁸. Additionally, there are two Grade II listed buildings approximately 100m to the south west of the PAG. Development at this location therefore has the potential to impact on the fabric and setting of key historic environment assets in the area.</p>	
Land, Soil and Water Resources	<p>The PAG is underlain by Grade 2 (very good) and Grade 3 (good to moderate) agricultural land. In the absence of a detailed agricultural land classification assessment, Given the presence of Grade 2 agricultural land, development at this location has the potential to lead to the loss of land classified as the Best and Most Versatile Agricultural Land.</p> <p>Although the majority of the PAG is greenfield land, there is an existing brownfield area within the PAG containing residential/commercial properties (parkland grounds surrounding the residential/commercial properties, including the Grade II* listed Lenham Court. However, this comprises the minority of the site.</p>	
Population and community	<p>The PAG could potentially deliver up to 180 dwellings, contributing to the local housing requirements for Lenham.</p> <p>Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. Lenham has a secondary school, primary school, a variety of amenity open spaces, a convenience store, community centre, health surgery and village church, which will limit the need for residents to travel for day-to-day services and facilities. There are also two employment sites within proximity to the PAG. This will help support the quality of life of residents through supporting access to key village amenities.</p>	

⁸ Historic England (2017): 'Heritage at Risk Register – South East', [online] available to download via: <https://historicengland.org.uk/images-books/publications/har-2017-registers/> last accessed [11/01/18]

Health and wellbeing	Supporting the health and wellbeing of residents, the site is located within good proximity to local services and facilities in the Rural Service Centre of Lenham, including a variety of open spaces and the health centre. Although these amenities are within walking distance, there is currently no pavement/footpath located along Old Ham Lane (which accounts for approximately half of the journey into the village centre), due to its narrow width. Therefore, an allocation of housing on this site is may have implications for road safety.	
Transportation	There are notable access constraints from the existing road network, with the PAG only accessible via 'Old Ham Lane' which is a fairly narrow single lane. Although it might be possible to widen Old Ham Lane, this could potentially encroach into the Deciduous Woodland BAP Priority Habitat and also impact upon the setting of the Grade II* listed 'Lenham Court'. The PAG is not currently accessible by frequent public transport links, with the nearest bus stop located approximately 500m to the north of the site. Lenham railway station is approximately 800m to the east.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.6: PAG4 'Land South of the Railway, West of Headcorn Road, North of Kiln Wood and East of Ham Lane'



Site size: 20.39ha (approximate)

Biodiversity and Geodiversity	<p>The PAG is not within a SSSI Impact Risk Zone for the proposed allocation. Therefore, development is unlikely to have any significant impacts on any SSSI designations if housing is delivered in this location.</p> <p>In regards to key habitats there is patch of Deciduous Woodland BAP priority habitat located within the central section of the PAG. Additionally, the site boundaries comprise rows of trees and/or hedgerows. The Kiln Wood Local Wildlife Site is located directly to the south of the PAG, comprising an area of ancient and semi-natural woodland. Additionally, there is a pond located behind the residential/commercial properties near to Headcorn Road (south eastern corner of the PAG). Both of these habitats have the potential to support protected species. In this context the site forms part of wider ecological networks in the area. If development is taken forward at this location, key elements of the area's ecological network should be retained and enhancements secured, and buffer zones with key habitats implemented.</p>	
Climatic factors	<p>In relation to adapting to the effects of climate change, the PAG is not located within identified flood risk zones for fluvial flooding; the site is located entirely within Flood Zone 1.</p> <p>There are three small areas of land which are at risk of surface water flooding, including the north western corner (adjacent to Kiln Wood), the northern boundary (near to Lenham railway station) and the south western section (behind the residential/commercial properties at Headcorn Road). It is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.</p> <p>The PAG is located within proximity to the Lenham village centre and employment areas, the services and facilities located along the High Street and Lenham railway station. As such, it is considered that development within the PAG will support a limitation of emissions from transport.</p>	
Landscape and historic environment	<p>In regards to landscape designations, the PAG is not located within the boundary or within the setting of the Kent Downs AONB.</p> <p>The PAG is located within the 'Harrietsham to Lenham Vale' LCA. As stated within the Maidstone LCS, the LCA is classified as having a 'medium landscape sensitivity' and 'high visual sensitivity' to change. The site has relative enclosure in the landscape given existing screening.</p> <p>'Leadingcross Green Farmhouse' is a Grade II listed building located at the south eastern corner of the site. There are two additional Grade II listed buildings within 50m of the south eastern corner of the site. It is considered that development within the PAG is unlikely to impact upon the fabric and setting of these heritage assets, as they are appropriately screened from view by the neighbouring residential properties and the existing vegetation surrounding them.</p>	
Land, Soil and Water Resources	<p>An allocation in the PAG is likely to result in the loss of arable greenfield land. The PAG is underlain by Grade 2 (very good) and Grade 3 (good to moderate) agricultural land. Given the presence of Grade 2 agricultural land, development at this location has the potential to lead to the loss of land classified as the Best and Most Versatile Agricultural Land.</p>	
Population and community	<p>The PAG could potentially deliver up to 305 dwellings, contributing to the local housing requirements for Lenham.</p> <p>The site is accessible to the services and facilities of Lenham, which has a secondary school, primary school, a variety of amenity open spaces, a convenience store, community centre, health surgery and village church. This will limit the need for residents to travel for day-to-day services and facilities, supporting their quality of life. Additionally, the Lenham Centre/Lenham Storage employment area is within walking distance to the PAG.</p>	

Health and wellbeing	Supporting the health and wellbeing of residents, the site is located within good proximity to local services and facilities in the Rural Service Centre of Lenham. With these amenities accessible on foot, an allocation of housing at this location will support healthier and more active lifestyles. Health and wellbeing will be supported by the site's proximity to the Kiln Wood Local Wildlife Site, the public rights of way network and the variety of amenity open spaces within Lenham, including a cricket ground, allotment gardens and a playing field.	
Transportation	The PAG is within walking distance to key public transport networks. The nearest bus stop is located approximately 500m to the north, at the junction between High Street and Ham Lane. Additionally, Lenham railway station is located directly to the north of the PAG. Development should seek to maximise the potential for residents to access the public transport network through protecting and enhancing the pavement/footpath into the village centre along Headcorn Road.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.7: PAG5 'Land South of the Railway, East of Headcorn Road and North of Oxley Wood'



Site size: 6.69ha (approximate)

Biodiversity and Geodiversity	<p>The PAG is not within a SSSI Impact Risk Zone for the type and scale of development potentially to be taken forward. Therefore, development is unlikely to have any significant impacts to any SSSI designations if housing is delivered in this location.</p> <p>The PAG comprises agricultural land which is periodically used for arable farming and does not comprise significant habitats suitable for protected species. This is reflected by the Maidstone LCS, which states that the significant amount of arable intensification within the 'East Lenham Vale' LCA means that the ecological integrity is moderate.</p> <p>There is a patch of Deciduous Woodland BAP Priority Habitat located directly to the south of the site, which includes Oxley Wood ancient and semi-natural woodland (which is recognised as a Local Wildlife Site within the Maidstone LCS). If development is taken forward at this location, key elements of the area's ecological network should be retained and enhancements secured, and buffer zones with key habitats implemented.</p>	
Climatic factors	<p>In relation to adapting to the effects of climate change, the PAG is not located within identified flood risk zones for fluvial flooding; the site is located entirely within Flood Zone 1.</p> <p>The majority of the land located in the eastern half of the PAG is at risk of surface water flooding.</p> <p>The PAG is located within proximity to the Lenham Square/Lenham Storage employment area, the services and facilities located along High Street and Lenham railway station. As such, it is considered that development within the PAG will support a limitation of emissions.</p>	
Landscape and historic environment	<p>In regards to landscape designations, the PAG is not located within the boundary or within the setting of the Kent Downs AONB.</p> <p>As stated within the Maidstone LCS, the PAG is located within the 'East Lenham Vale' LCA. Although the LCA is classified as having a 'high landscape sensitivity' and 'high visual sensitivity' to change. The PAG has medium and long distance open views to and from open land to the north and east and as such is of high landscape sensitivity.</p> <p>The PAG does not contain and is not within the setting of any nationally or locally designated heritage assets.</p>	
Land, Soil and Water Resources	<p>Development at this location would lead to the loss of greenfield land. The PAG is underlain by Grade 3 (good to moderate) agricultural land. In the absence of a detailed agricultural land classification assessment, it is not possible to determine whether any areas of Best and Most Versatile Agricultural Land are located within the PAG. However, as the PAG is periodically used for arable farming, development would lead to the loss of productive farmland.</p>	
Population and community	<p>The PAG could potentially deliver up to 150 dwellings, contributing to the local housing requirements for Lenham.</p> <p>The site is accessible to the services and facilities of Lenham, which has a secondary school, primary school, a variety of amenity open spaces, a convenience store, community centre, health surgery and village church. This will limit the need for residents to travel for day-to-day services and facilities, supporting their quality of life. Additionally, the Lenham Centre/Lenham Storage employment area is within walking distance to the PAG.</p>	
Health and wellbeing	<p>Supporting the health and wellbeing of residents, the site is located within good proximity to local services and facilities in the Rural Service Centre of Lenham. With these amenities accessible on foot, an allocation of housing at this location will support healthier and more active lifestyles.</p> <p>Health and wellbeing will be supported by the site's proximity to the Stour Valley Walk, which is accessible at the north eastern boundary of the PAG. There is an existing PRoW which passes along the northern and eastern boundaries of the PAG and connects to the Stour Valley Walk. Additionally, the PAG is within proximity to a variety of amenity open spaces within Lenham, including a cricket ground, allotment gardens and a playing field.</p>	

Transportation	The PAG is within walking distance to key public transport networks. The nearest bus stop is located approximately 500m to the north, at the junction between High Street and Ham Lane. Additionally, Lenham railway station is located directly to the west of the PAG. Development should seek to maximise the potential for residents to access the public transport network through protecting and enhancing the pavement/footpath into the village centre along Headcorn Road.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

Table 4.8: PAG6 'Land North of the Railway, East of Lenham Village and South of the A20 Ashford Road'



Site size: 51.47ha (approximate)

Biodiversity and Geodiversity	<p>The PAG is not within a SSSI Impact Risk Zone for the proposed allocation. Therefore, development is unlikely to have any significant impacts to any SSSI designations if housing is delivered in this location.</p> <p>From an ecological perspective, there is an area of Deciduous Woodland BAP Priority Habitat located at the northern boundary of the PAG, enclosing a pond. Additionally, there is a small stream flowing southwards through the PAG which is bordered by a line of trees. The stream is a tributary of the Great Stour, joining the river directly to the south east of the PAG.</p> <p>The woodland block and interlinking hedgerows present in the PAG are important components of the area's ecological networks and potentially provide suitable habitats for protected species.</p>	
Climatic factors	<p>In relation to adapting to the effects of climate change, the PAG is not located within identified flood risk zones for fluvial flooding; the site is located entirely within Flood Zone 1.</p> <p>The majority of the PAG is located within an area at risk from surface water flooding. Sections of the PAG at the highest risk include the land in the south eastern section which surrounds the confluence of the small stream and the Great Stour (south eastern section) and land within the central section which surrounds the Stour Valley Walk.</p> <p>The PAG is located within proximity to the Ashmill Business Park employment area, the services and facilities located along High Street (within the village centre of Lenham) and Lenham railway station. As such, it is considered that development within the PAG will support a limitation of emissions from transport.</p>	
Landscape and historic environment	<p>In regards to landscape designations, the PAG is not located within the boundary or within the setting of the Kent Downs AONB.</p> <p>The PAG is located within the 'East Lenham Vale' LCA. As stated within the Maidstone LCS, the LCA is classified as having a 'high landscape sensitivity' and 'high visual sensitivity' to change. The Stour Valley Walk passes directly through the boundary of the PAG, with development likely to significantly change the visual amenity and character of the recreational trail. Overall the area comprises a key component of the setting of Lenham village, and development at this location would have significant impacts on landscape and villagescape character.</p> <p>The north western section of the PAG shares an overlapping boundary with a section of the Lenham Conservation Area. Notably the Grade I listed 'Church of St Mary' and the Grade I listed 'Barn Circa 40 yards north west of Court Lodge' are within the boundaries of both the Conservation Area and the PAG. The Church of St Mary is considered to be in 'poor condition' and at immediate risk of further rapid deterioration or loss of fabric, as stated in the 2017 Heritage at Risk Register for the South East. There are three additional Grade II listed buildings within the boundary of the PAG. Development within the PAG therefore has the potential to have significant impacts on the setting of these key heritage assets.</p>	
Land, Soil and Water Resources	<p>A detailed agricultural land classification assessment has been undertaken in the north western section of the PAG. The assessment determined that this section does not contain any areas of the Best and Most Versatile agricultural land (i.e. Grade 2 and Grade 3a), and classifies these areas as either 'Grade 3b' or 'Other' land. There is a patch of Grade 2 Agricultural Land (i.e. the Best and Most Versatile) located directly adjacent to the northern boundary of the PAG.</p> <p>The remaining sections of the PAG are underlain by Grade 3 (good to moderate) agricultural land. However, in the absence of a detailed assessment, it is not possible to determine whether any areas of Best and Most Versatile agricultural land are present within these sections.</p>	

Population and community	<p>The PAG could potentially deliver up to 772 dwellings, significantly contributing to the local housing requirements for Lenham. However, development would lead to the loss of a number of agricultural fields which provide a local economic benefit.</p> <p>The site is accessible to the services and facilities of Lenham, which has a secondary school, primary school, a variety of amenity open spaces, a convenience store, community centre, health surgery and village church. Additionally, the Ashmills Business Park employment area is located approximately 200m to the north east of the PAG. This will limit the need for residents to travel for day-to-day services and facilities, supporting their quality of life.</p>	
Health and wellbeing	<p>Supporting the health and wellbeing of residents, the site is located within good proximity to local services and facilities in the Rural Service Centre of Lenham.</p> <p>Health and wellbeing will be supported by the Stour Valley Walk which passes directly through the centre of the PAG and into the village centre. Additionally, there is a variety of amenity open spaces within proximity to the PAG, including a cricket ground, allotment gardens and a playing field.</p> <p>However the area comprises a key component of Lenham's open space and green infrastructure network. Development of this area would therefore lead to the loss of the intrinsic amenity value of the location, undermining residents' health and wellbeing.</p>	
Transportation	<p>The site is accessible to the services and facilities of Lenham by walking and cycling. Whilst the site is not directly linked to public transport networks, the northern and western sections of the PAG are more accessible to via public transport due to their proximity to the bus stops located along Old Ashford Road and Lenham Railway Station, respectively.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.9: PAG7 'Land South of Ashmills Business Park and West of East Lenham'



Site size: 10.69ha (approximate)

Biodiversity and Geodiversity	<p>The PAG is not within a SSSI Impact Risk Zone for the type of development proposed. Therefore, development is unlikely to have any significant impacts to any SSSI designations if housing is delivered in this location.</p> <p>The PAG comprises agricultural land which is periodically used for arable farming. As such, it does not comprise significant habitats suitable for protected species.</p> <p>There is a patch of Deciduous Woodland BAP Priority Habitat located directly to the south of the PAG.</p>	
Climatic factors	<p>In relation to adapting to the effects of climate change, the PAG is not located within identified flood risk zones for fluvial flooding; the site is located entirely within Flood Zone 1.</p> <p>There are areas of land located within the southern half of the PAG which are at risk from surface water flooding. However, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.</p> <p>The PAG is located within proximity to the Ashmill Business Park employment area and to a main bus route between Lenham and Ashford.</p>	
Landscape and historic environment	<p>The Kent Downs AONB is located directly to the north and north east of the AONB. Due to the sloping topography (north to south), walkers using the North Downs Way/Pilgrim's Way footpath have some direct views into the PAG from the AONB.</p> <p>The PAG is located within the 'East Lenham Vale' LCA. As stated within the Maidstone LCS, the LCA is classified as having a 'high landscape sensitivity' and 'high visual sensitivity' to change.</p> <p>However, it should be noted that local landscape character is compromised by the industrial buildings of Ashmills Business Park.</p> <p>The PAG does not contain and is not within the setting of any nationally or locally designated heritage assets.</p>	
Land, Soil and Water Resources	<p>The PAG is underlain by Grade 2 (very good) and Grade 3 (good to moderate) agricultural land. Given the presence of Grade 2 agricultural land, development at this location has the potential to lead to the loss of land classified as the Best and Most Versatile Agricultural Land.</p> <p>The northern half of the PAG is within a sensitive groundwater location.</p>	
Population and community	<p>The PAG could potentially deliver up to 160 dwellings, contributing to the local housing requirements for Lenham.</p> <p>The site is accessible to the services and facilities of Lenham, which has a secondary school, primary school, a variety of amenity open spaces, a convenience store, community centre, health surgery and village church. Additionally, the Ashmills Business Park employment area is directly to the north of the PAG. This will limit the need for residents to travel for day-to-day services and facilities, supporting their quality of life.</p>	
Health and wellbeing	<p>Supporting the health and wellbeing of residents, the site is located within good proximity to local services and facilities in Lenham. Although these amenities are within walking distance, there is currently no pavement/footpath located along sections of Old Ashford Road (which accounts for approximately half of the journey into the village centre). Nonetheless, an allocation of housing on this site is likely to support healthier and more active lifestyles providing that pedestrian enhancements are incorporated into the design.</p> <p>Health and wellbeing will be supported by the site's proximity to the North Downs Way and the Stour Valley Walk, as well as the variety of amenity open spaces within Lenham.</p>	

Transportation	<p>The site is located within good proximity to local services and facilities in Lenham</p> <p>In regards to accessing the PAG, there is the potential to create an entry point into the northern section of the PAG via a turning from Old Ashford Road.</p> <p>The PAG is accessible to the existing public transport network, with the nearest bus stop located within 500m to the west of the site along Old Ashford Road. Lenham Railway Station is located approximately 1.5km to the south west of the PAG.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

Choice of sites taken forward for the purposes of the Neighbourhood Plan

4.32 The current version of the Neighbourhood Plan allocates seven sites for housing across three development areas. These are as follows:

North-East of Lenham Village Extension

- Site 1 – Land South of Old Ashford Rd

4.33 The area covered by the site corresponds with Potential Area of Growth (PAG) 7 considered above.

South-West of Lenham Village Extension

- Site 2 – Land West of Headcorn Rd and North of Leadingcross Green
- Site 3 – Land East of Old Ham Lane and South of the Railway
- Site 4 – Land West of Headcorn Rd and South of the Old Goods Yard

4.34 The area covered by these three sites corresponds with PAG4 considered above.

North-West of Lenham Village Extension

- Site 5 – Land West of Old Ham Lane and North of the Railway
- Site 6 – William Pitt Field
- Site 7 – Land West of Loder Close

4.35 The area covered by these three sites corresponds with PAG2 considered above.

4.36 This follows the consideration of the findings of the site assessment undertaken for the Neighbourhood Plan, the SEA findings presented above, consultation events and an ongoing consideration of viability and achievability.

4.37 Lenham Neighbourhood Plan Group identified certain criteria against which potential sites should be assessed as follows:

1. **Landscape and Visual Impacts:** Identify sites for development which would fit into the existing landscape character of the village with minimal harm to existing important areas of landscape quality and high-quality views.
2. **Historic Environment:** Promote a pattern of development to protect and enhance the existing historic assets within the fabric of the village.
3. **Traffic Impacts:** Promote a pattern of development which would allow the historic environment of Lenham Square and its approaches to be protected from harmful effects of through traffic.
4. **Transportation:** Promote a sustainable pattern of transportation with potential for easy access to Lenham Station, village facilities and existing and potentially enhanced bus routes.

5. **Health and Wellbeing:** Promote a pattern of development which would allow easy access to enhanced facilities for sport and recreation for all.
 6. **Population and Community:** Facilitate developments which would allow for good quality, well-landscape, affordable housing at locations with good accessibility to local facilities, especially by foot and cycle.
 7. **Climate Change:** Promote a pattern of development which would have regard to potential harmful impacts on climate change and flooding and which would allow for natural drainage swales to be incorporated into the development.
 8. **Biodiversity:** Select a pattern of development which avoids or allows effect mitigation of potential impacts on features of biodiversity.
 9. **Brownfield Development:** Promote a pattern of development which allows for opportunities to development brownfield sites to an extent which is consistent with strategic development plan policies.
 10. **Land and Soil Resources:** Because of the high-quality of the agricultural land which surrounds Lenham village, if sites were to be selected to meet the requirements of the broad location allocation within the strategic policies of the emerging Maidstone Borough Local Plan, it was accepted that some conflict with objectives to prevent some loss of high-quality agricultural land would be inevitable.
- 4.38 The criteria are listed broadly in order of their importance to the Parish Council. Assessing potential sites against the criteria resulted in the selection of the sites shown in the Plan. The reasons for site selection were:
- The sites were available for development;
 - The sites together form a coherent series of parcels to enable alternative transport solutions and uses to be developed in and around Lenham Square;
 - The landowners and developers were consulted and agreed that the release of their sites should follow broadly the principles for allocation of open space and sustainable urban drainage (SuDS) contained within the emerging Maidstone Borough Local Plan resulting in an attractive green and blue grid within the developments;
 - The proximity of the development sites to existing village facilities, together with the ability to enhance accessibility, meant the proposals met planning requirements for sustainability in its widest sense;
 - The sites avoided the need to take land within the AONB and protected employment sites both of which were contrary to established national and borough policies;
 - At appropriate densities the sites selected had capacity to deliver the number of units needed to achieve strategic planning objectives for the broad location policy within the emerging Maidstone Borough Local Plan.

The development of Neighbourhood Plan policies

- 4.39 To support the implementation of the vision for the Lenham Neighbourhood Plan discussed in Section 2.6, the submission version of the Neighbourhood Plan puts forward 33 policies to guide development in the Neighbourhood Plan area.
- 4.40 The policies, which were developed following extensive community consultation and evidence gathering, are as below. An earlier version of these policies were assessed through the SEA process, with findings and recommendations presented in the Environmental Report accompanying the Regulation 14 version of the Neighbourhood Plan (September 2018).

Table 4.3: Lenham Neighbourhood Plan policies

Policy no.	Policy
Policy D1	Quality Design
Policy D2	Small scale residential development and householder extensions
Policy D3	Innovation and Variety
Policy D4	Design for self and custom build homes
Policy D5	Residential Car Parking Design
Policy AT1	Active travel
Policy AT2	Public transport
Policy AT3	Design to encourage sustainable transport
Policy AT 4	Active and sustainable travel projects
Policy GS1	Natural and amenity green space
Policy LGS1	Local Green Space
Policy CP1	Countryside Protection
Policy EMP1	Lenham Square
Policy EMP2	Land North and South of the Railway Station
Policy EMP3	Providing for a mix of Employment Opportunities
Policy CF1	Community Facilities
Policy CF2	Lenham Community Centre
Policy CF3	Health Infrastructure
Policy ED1	Education
Policy ED2	Education:
Policy ED3	Education
Policy ED4	Education
Policy TOU1	Tourism
Policy AQ1	Charging points for electric vehicles
Policy AQ2	Charging points for electric vehicles
Policy AQ3	Renewables
Policy SHDS1	Strategic Housing Delivery Sites: General Requirements
Policy SHDS2	Housing Delivery Sites: Design principles
Policy SHDS 3	Housing and Mix Tenure
Area 1	North East of Lenham Village Extension
Area 2	South West of Lenham Village Extension
Area 3	North West of Lenham Village Extension
Policy DC1	Developer Contributions

5. What are the appraisal findings at this current stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current submission version of the Lenham Neighbourhood Plan. This chapter is structured as follows:
- Sections **5.5** to **5.41** present an appraisal of the current version of the Lenham Neighbourhood Plan under the seven SEA theme headings; and
 - Sections **5.42** to **5.44** subsequently discuss overall conclusions at this current stage.

Approach to the appraisal

- 5.2 The appraisal is structured under the seven SEA themes.
- 5.3 For each theme 'significant effects' of the submission version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.⁹ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Biodiversity and geodiversity

- 5.5 Biodiversity and geodiversity features of note within the Neighbourhood Plan area and which may be affected by poorly planned development include Lenham Quarry SSSI in the north-east of the Neighbourhood Plan area, Local Wildlife Sites, a network of ancient and semi-natural woodlands – particularly concentrated in the south west of the Neighbourhood Plan area, and grassland and heathland BAP Priority Habitats in the south east.
- 5.6 With regards to the overall spatial strategy, the Neighbourhood Plan seeks to extend the settlement boundary to include new sites adjacent to the existing main settlement area of Lenham village. None of the proposed site allocations are located within an Impact Risk Zone for the Lenham Quarry SSSI. As such the spatial strategy is considered unlikely to have potential negative impacts on the integrity of the nationally designated biodiversity sites in the parish.
- 5.7 Site 1 (located to the east of Lenham) and Site 5, 6 and 7 (located to the west of Lenham) are identified in the Potential Areas of Growth (PAG) analysis (see previous chapter – assessment of reasonable alternatives) as not being likely to support significant populations of protected species or their habitats. However; Site 5 is located adjacent to Dickley Wood (which comprises deciduous woodland BAP Priority Habitat). Whilst direct impacts on the woodland from landtake and fragmentation are not anticipated at this location, disturbance may take place from new development at this location from noise, light pollution or trampling from enhanced access. This is recognised by the policy provisions for the site, which identify that the *'design and layout of the site will be informed by a detailed landscape and ecological analysis and Masterplan reflecting that analysis'* to incorporate *'the provision of a landscape wildlife corridor to the west of the site as part of the Open Space [a further requirement], to maintain the integrity of Dickley Wood'*. This will help deliver a landscape buffer to the habitat which includes open space (providing protection and mitigating the impacts of disturbance to some extent) and also provides for potential enhancements in the transitional area between the habitat and built development, with the potential for long term positive effects.

⁹ Environmental Assessment of Plans and Programmes Regulations 2004

- 5.8 Sites 2, 3 and 4 are located south of Lenham village, with Site 2 containing the deciduous woodland BAP Priority Habitat, and Site 3 and 4 lying adjacent to further woodland priority habitats. These form part of the Kiln Wood Local Wildlife Site and its supporting habitat. The policy provisions within the Neighbourhood Plan for the site allocations include the requirement for *'a detailed landscape and ecological analysis and Masterplan reflecting that analysis'*.
- 5.9 The policy provisions for Sites 2 and 3 seek to establish a wildlife corridor along the southern borders of the sites (up to 15m wide in the west), with a view to protecting the ecological integrity of Kiln Wood. The policy provisions also seek to provide footpaths/cycle access along this corridor connecting to the existing roads that pass east and west of the site (Headcorn Rd and Old Ham Lane). This will provide multiple benefits to biodiversity, health and wellbeing and accessibility with the potential for long term positive effects.
- 5.10 Looking at the Neighbourhood Plan as a whole, a number of further policies have the potential to affect biodiversity and geodiversity either directly or indirectly. Policies relating to green space, open space and protection of the countryside (Policies GS1, GS2, LGS1 and CP1) all support the retention and enhancement of existing habitats and natural spaces that contribute towards ecological connectivity with the potential for both direct and indirect long term positive effects. For example Policy GS1 (Natural and amenity green space) supports proposals that *'create new wildlife habitats, connect, enhance and retain existing wildlife habitats'* or *'provide opportunities for gardening, wildlife and food production within existing and new residential areas'*, and Policy LGS1 (Local Green Space) provides protection for key features such as the village pond and associated open land. Policy CP1 also identifies that development proposals on land outside the settlement boundary (designated as countryside) will be assessed for its potential impact on the biodiversity of the area.
- 5.11 Policies relating to design provide further protections or enhancement opportunities for biodiversity. Specifically Policy D1 (Quality Design) states *'design that incorporates opportunities to enhance biodiversity are encouraged'* and Policy SHDS2 (Housing Delivery Sites: Design principles) identify that the proposed development sites must *'secure attractive and clearly defined public and private spaces that will enable retention and enhancement of the existing landscape, trees and vegetation'*. Further general requirements for the proposed housing delivery sites (Policy SHDS1) also identify that all development proposals will be *'subject to the results and recommendations of a phase one ecological survey prepared to the satisfaction of Maidstone Borough Council and in consultation with Lenham Parish Council'*.
- 5.12 Overall, the Neighbourhood Plan sets a solid basis for the protection and enhancement of habitats and ecological connectivity in the Neighbourhood Plan area. Furthermore, it is important to note that the majority of the northern half of the Plan area is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). As such, the management plan for this nationally designated landscape provides an additional level of protection to the natural environment (including biodiversity and geodiversity), with its purpose to conserve and enhance the special qualities and the natural beauty of the AONB.

Climate change

- 5.13 The delivery of the scale of development in the Neighbourhood Plan area required by the Local Plan will inevitably increase the overall footprint of the parish in terms of domestic consumption and emissions, and emissions from transport. However this does not necessarily translate to an increase in per capita emissions. Development in the village can support continued low per capita emissions through significant opportunities for active travel and good local accessibility, reducing the need to travel. Whilst Site 1 is located slightly further to the east of the settlement area, the rest of the site allocations are located within excellent walking distance of the railway station. This will support a modal shift away from the private vehicle. The site allocation policies, including the policies identifying general requirements and design principles across all of the proposed development sites (Policies SHDS1 and SHDS2), all seek to maximise the potential for new safe and attractive routes that promote active travel (walking and cycling). This includes new connections / enhancements to infrastructure where necessary – including new bridges to support north-south connectivity and movement across the railway line, and railway station enhancements. Policies AQ1 and AQ2 also support the use of lower carbon modes of transport through seeking to encourage the introduction of charging points for electric vehicles in public parking areas and residential dwellings.
- 5.14 As such, when combined with Local Plan proposals to reduce the reliance on less sustainable energy sources (e.g. Policy DM1 of the Maidstone Local Plan), the Neighbourhood Plan and its spatial strategy is

considered likely to support low per capita emissions, with the potential for long term positive effects in relation to this SEA theme.

- 5.15 In terms of climate change adaptation, none of the site allocations are located within an area of fluvial flood risk. Some of the sites are however subject to areas of surface water flood risk. Whilst existing mitigation provided through Local Plan policies and the provisions of the NPPF are likely to ensure no significant effects in terms of flood risk arise as a result of development, the Neighbourhood Plan seeks to strengthen policy mitigation in relation to surface flood risk at the local level. This includes policy requirements (Policy SHDS1) for the proposed allocations to provide '*appropriate surface water and flood mitigation measures*' which '*incorporate sustainable drainage systems*' and significant enhancements to open space provision and the incorporation of such provision within new development areas. Policy GS1 (Natural and amenity green space) also supports the implementation of sustainable drainage provision.
- 5.16 The development of a high quality local Green Infrastructure Network through the Neighbourhood Plan will also support climate change adaptation. The Natural Environment White Paper recognises that green infrastructure is 'one of the most effective tools available' to manage 'environmental risks such as flooding and heat waves' and the 25 Year Environment Plan highlights that green infrastructure 'brings wider benefits, including sequestering carbon, absorbing noise, cleansing pollutants, absorbing surface water and reducing high temperatures'. In this context the plan's focus on enhancements to green infrastructure provision will be a key contributor to adapting to climate change in the area. These policies will therefore support positive gains with regard to climate change adaptation measures within the Neighbourhood Plan area through, for example, helping to regulate surface water run-off and helping manage extreme weather events.
- 5.17 The Neighbourhood Plan therefore will support climate change adaptation through helping to reduce the impact of surface water runoff and providing natural flood defence mechanisms, aligning to the green infrastructure work being carried out within the wider borough and the Kent Downs AONB.

Landscape and historic environment

- 5.18 Whilst the Neighbourhood Plan area has a rich and diverse historic environment, none of the development allocations proposed through the spatial strategy of the Neighbourhood Plan are known to contain any designated heritage assets. Also, with the exception of Site 2, none of the allocated sites are likely to affect the setting of any designated heritage assets. Site 2 is located in close proximity to a listed building on Headcorn Road, however the PAG analysis (see previous chapter – assessment of reasonable alternatives) identifies that existing screening significantly reduces the potential for negative effects. The spatial strategy therefore contributes to the protection of the historic environment. The Neighbourhood Plan also provides further protections for the historic environment through requirements for; high quality design that displays '*a high level of architectural quality which responds positively to local context*', as well as a demonstration of how proposals respond to historic assets. This is alongside support for innovative and contemporary design where appropriate, allowing for modern evolution of built development that complements the existing fabric of the Neighbourhood Plan area.
- 5.19 The Neighbourhood Plan area is located within and surrounded by areas of significant sensitivity in terms of landscape character. This includes the Kent Downs AONB covering the northern part of the parish. The countryside setting surrounding the village and hamlets in the parish is also a valued landscape locally. The sensitive landscape of the area is therefore a key consideration when accommodating growth in the Neighbourhood Plan area.
- 5.20 The Kent Downs AONB stretches north of the A20 and in terms of the spatial strategy, Sites 1, 5 and 7 are located in closest proximity just south of the A20. Whilst Site 6 is also located in relatively close proximity, it is enclosed by Sites 5 and 7 and existing residential development in the east.
- 5.21 The PAG analysis (previous chapter) identifies that Sites 2, 3, 4, 5, 6 and 7 are located within the Harrietsham to Lenham Vale Landscape Character Area (LCA) which is considered to have a medium landscape sensitivity and high visual sensitivity to change. Site 1 is located within the East Lenham Vale LCA, which is considered to have a high landscape sensitivity and high visual sensitivity to change.
- 5.22 The Neighbourhood Plan seeks to address these landscape constraints by requiring high quality design, encompassing innovative and contemporary design where appropriate. For example Policy D1 (Quality

Design) requires *'all new development in Lenham should contribute to the creation of high quality places through a design-led approach underpinned by good design principles and reflecting a thorough site appraisal'* whilst Policy D3 (Innovation and Variety) states *'development proposals that establish bespoke design solutions and residential typologies (as opposed to application of standard 'off-the-shelf' housing types and layouts) are actively encouraged'* further stating that *'schemes that respond to and reinterpret local design cues, and which demonstrate an imaginative sense of place whilst respecting the surrounding context are welcomed.'* The policy provisions further allow for a continuation in traditional design that is *'of the place and based on historic detailed forms in the Parish'*. As such, the Neighbourhood Plan can be viewed as promoting design that will support a unique and strong visual identity, which complements its landscape setting. The policies of the Neighbourhood Plan also have a close focus on ensuring design aspects do not impact upon the setting of the AONB, including requirements that development *'shall be mindful of Lenham's location in the immediate foreground [of the Kent Downs AONB]'*, and that *'the size of buildings should be such that the buildings are almost screened by trees and other vegetation when viewed from the scarp of the AONB'* as well as ensuring detail such as solar panels *'blend into the horizon when viewed from the AONB'* (Policy D1 - Quality Design). Enhanced natural screening measures are actively encouraged, for example Policy D1 identifies *'native, eventually large trees shall be planted alongside roads and in areas which are kept as communal areas in order to achieve maximum screening of the development when viewed from the AONB'*. As such, the Neighbourhood Plan policies will bring long term positive effects for landscape character through promoting high quality design which seeks to support the integrity of the landscape.

- 5.23 The PAG analysis (see previous chapter – assessment of reasonable alternatives) identifies that PAG2 (encompassing Sites 5, 6 and 7) is land that contributes to the green gap between Lenham and Harrietsham. Whilst the loss of this land may ultimately reduce the extent of the green gap, with the potential for long term negative effects, it will not lead directly to coalescence. Alongside, the neighbouring woodland provides a natural barrier to further development, ensuring that the village continues to be contained within this area. As such, the effects are not considered likely to be of significance.
- 5.24 Overall it is considered that the Neighbourhood Plan policies and spatial strategy provide a robust basis for the protection and enhancement of landscape and villagescape character in the parish and the conservation of the historic environment. This will provide an additional level of detail to the provisions of the Maidstone Borough Local Plan and Kent Downs AONB Management Plan relating to landscape character and the historic environment, and help limit the impacts of the scale of development required through the Local Plan.

Land, soil and water resources

- 5.25 In relation to the spatial strategy proposed through the Neighbourhood Plan, all of the proposed site allocations are considered likely to result in the permanent loss of areas of Grade 2 and Grade 3a land. This comprises land classified as the best and most versatile agricultural land; with the potential for **long term significant negative effects** in this respect.
- 5.26 Whilst the proposed Neighbourhood Plan allocations contribute to significant losses of greenfield land, the Neighbourhood Plan is required by the Local Plan to deliver a significant level of growth in an area with limited brownfield opportunities. As such these losses are an inevitable result of this proposed growth. The Neighbourhood Plan seeks to mitigate this effect to some extent through on site open space requirements and natural landscape and ecological corridors. Furthermore, Policy D2 identifies that *'applications for small-scale and infill development involving the reuse and redevelopment of previously developed land within the built-up area of Lenham are welcomed'*.
- 5.27 Policy provisions to minimise risks associated with surface water run-off via the application of sustainable drainage systems (Policy SHDS1, and discussed under the Climate Change theme above) should support the appropriate management of surface water in the Neighbourhood Plan area through attenuation and flow restriction.
- 5.28 Provisions for sustainable waste management are required through the Maidstone Local Plan (Policy DM1 – Principles of Good Design), which it is anticipated will provide sufficient mitigation to ensure that new development within the Neighbourhood Plan area will not lead to any significant negative effects in terms of waste.

Population and community

- 5.29 Lenham village is designated as a Rural Service Centre in the Local Plan, which reflects the high level of community provision within the village. Outside of the Maidstone urban area, rural service centres are the second level of the settlement hierarchy to accommodate growth. The Local Plan identifies through Policy SP8 sites to accommodate the development of approximately 155 new dwellings at Tanyard Farm, Old Ashford Rd (Policy H1(41)) and Glebe gardens (Policy H1(21)), as well as two pitches for Gypsy and Traveller accommodation in accordance with Policy GT1(8). It also supports the provision of a one form entry expansion at either Lenham or Harrietsham primary schools, improvements to health infrastructure to include expansion at the Len Valley Practice and the provision of open space. The policy further requires Lenham, as an identified 'broad location for growth' to deliver a further 1,000 dwellings post April 2021. This requirement for further housing is to be addressed either through the Neighbourhood Plan or in the next Local Plan review.
- 5.30 The Neighbourhood Plan therefore provides the opportunity for the local community to shape the significant scale of development and growth that it is required will be delivered in the village from 2021. As such the Neighbourhood Plan allocates land to accommodate the outlined level of growth (1,000 dwellings), and outlines priorities identified at the neighbourhood level (such as through high quality design (Policy D1), a mix of housing types and tenures to meet local needs (Policy SHDS1), and infrastructure improvements) to ensure that this growth supports the vitality and viability of the village and its communities in the longer term. This has the potential for **significant long term positive effects**.
- 5.31 Given the existing scale of the village, with a good level of community and public transport infrastructure, the Neighbourhood Plan area benefits from relatively high levels of accessibility. This will be further supported by the location of the proposed allocations, which will have good public transport links (including by their proximity to the railway station), and be accessible to existing amenities. Accessibility will be further supported by the Neighbourhood Plan's focus on supporting the delivery of new or improved services (including new or improved health and education facilities proposed through Policies CF3 and ED1 to ED4, and enhancements to community facilities proposed through Policies CF1 and CF2). This has the potential to lead to long term positive effects.
- 5.32 The Neighbourhood Plan further seeks to protect and enhance retail, commercial and employment provision in the area. This will help support the long term vitality and economic viability of the village and its communities. Policy EMP1 identifies support for '*development proposals which reinforce the pre-eminence of Lenham Square as the retail, commercial, employment and entertainment hub of the Parish*'. Policy EMP2 further supports employment sites to the north of the railway station where such proposals '*can demonstrate that they would lead to improvements to the public realm in the area*'. Proposals for new commercial development in this area will '*be supported subject to an assessment of any potential impact upon existing retail provision in the Village*'. Further to this Policy EMP3 identifies that '*proposals that provide for local employment opportunities within the built-up area, including small scale social enterprises, small and medium size businesses, and live work units, are welcome, particularly where they reduce out-commuting*' whilst ensuring that all '*applications for new business-related development should improve the quality of the environment and should accord with best practice design principles*.' Policy TOU1 also seeks to support the visitor economy, stating that '*sustainable development that improves the quality and diversity of existing tourist facilities, attractions, accommodation and infrastructure, including green infrastructure, will be viewed favourably*.' The policy provisions should therefore support a vibrant and viable local economy, whilst not detracting from the quality of the surrounding built and natural environment; with the potential for long term positive effects.

Health and wellbeing

- 5.33 The main priority areas within the Joint Health and Wellbeing Strategy for Kent link to preventing ill health, supporting residents with mental health and dementia, enhancing the quality of life for residents with long term health issues and ensuring that every child has the best start in life. In this context, the policies contained within the Neighbourhood Plan will bring a range of benefits for the health and wellbeing of residents living in the Neighbourhood Plan area, as well as addressing some of the key aims of the Joint Health and Wellbeing Strategy.
- 5.34 In relation to the quality of life and the wellbeing of local residents, there is a strong emphasis within the Neighbourhood Plan on the retention and improvement of community facilities to support both existing and

new residents in the parish. For example Policy CF1 identifies that *'applications to enhance and provide additional community facilities will be supported'* whereas *'the loss of community buildings (Use Class D1) will be resisted unless it can be demonstrated that demand within the locality for the facility no longer exists or that suitable alternative provision is made elsewhere'*. Specifically, Policy CF3 seeks to secure upgrades to existing health infrastructure (local doctors' facilities) which will support the ongoing health and wellbeing of a growing population with the potential for long term positive effects.

- 5.35 Further to this, there is now robust evidence that access to the natural environment improves people's health and wellbeing through encouraging healthy outdoor recreation and relaxation. In this context the Neighbourhood Plan seeks significant open space provision within the proposed development areas and also designates six areas as Local Green Space through Policy LGS1. Policy GS1 (Natural and amenity green space) also sets out a range of provisions for delivering high quality multifunctional green infrastructure. The policy provisions also seek to complement new open space provision with new attractive landscape corridors and walking / cycle paths. This should contribute to maintaining a high level of accessible open space, green space and recreational space to support healthy and active lifestyles in the Neighbourhood Plan area; with the potential for long term positive effects. This will also support access to the surrounding countryside (including the AONB), further enhancing recreational opportunities.
- 5.36 Overall, the policies within the Neighbourhood Plan aim to protect and enhance the assets which positively contribute to the health and wellbeing of local residents, and ensure that new development supports active travel and good accessibility. Therefore, the Neighbourhood Plan is considered likely to positively contribute to healthy lifestyles and good levels of health and wellbeing in the Neighbourhood Plan area.

Transportation

- 5.37 The Neighbourhood Plan area benefits from good access to public transport networks, including rail and bus services. There is also a good level of service and facility provisions within the village – recognised by Lenham's designation as a Rural Service Centre. As such there is significant potential for housing provision in the Neighbourhood Plan area to support active travel and a modal shift away from the private vehicle, as well as limit the need to travel to key services and facilities.
- 5.38 In terms of the spatial strategy, the housing delivery sites (particularly Sites 2, 3 and 4 in the south) are located in areas which maximise the potential to integrate and connect with existing sustainable transport routes, including in locations with excellent access to the railway station. As such the spatial strategy is considered likely to support the use of alternative modes of transport to the private car.
- 5.39 The Neighbourhood Plan further places a strong emphasis on active travel to support a modal shift away from the private car. For example; Policy AT1 identifies that new development should seek deliver direct, safe and convenient to use walking and cycling routes and demonstrate how they link into the existing footpath and cycle network, providing connections between residential, retail, leisure, commercial and community uses. The policy also seeks to ensure that proposals *"...for commercial, leisure and community uses should support and enable active travel through inclusion of safe, secure and convenient cycle parking and changing facilities where appropriate"* and proposals *"...for development that reduce the capacity or safety of existing active travel infrastructure, including footpath and pavement space, or which results in the removal of locally important facilities, will not be supported."* This will support continued measures to enhance active travel, with the potential for long term positive effects.
- 5.40 The Neighbourhood Plan also provides policy provisions that seek to enhance public transport modes. In this respect Policy AT2 supports proposals that *'help deliver improved public transport services through new or extended and more frequent routes'*. Alongside, Policy AT3 seeks to ensure that the Strategic Housing Development Sites accommodate new bus routes and integrate with existing bus routes. It also seeks to ensure that street design effectively accommodates all users as a shared space. Given the Neighbourhood Plan area already provides residents with good accessibility to public transport modes (both rail and bus), services and facilities and employment opportunities, this provides a strong basis to support the active travel ambitions for the Neighbourhood Plan area. It also has the potential to limit the need to travel to key services and facilities. As such, the plan in accommodating growth in accessible locations, and through promoting sustainable transport use, can be viewed as likely to lead to **significant positive effects** in this respect.

- 5.41 The Neighbourhood Plan further identifies that the localised issue of north-south connectivity places a barrier to the effective integration of development in the south of the Neighbourhood Plan area. The policy provisions therefore seek to implement a scheme of works that ensures access to the housing sites is delivered in a coordinated manner and a scheme of shuttle working is initiated at Smokey Bridge (Policy SHDS1). To minimise the effects of this infrastructure development on residents and connectivity, policy provisions state that within the relevant sites (Sites 2, 3 and 4) *'no dwellings shall be occupied until that scheme is operational and open to traffic'*. The site allocation policies (e.g. for Site 6) identify that this scheme of works *'will have capacity to accommodate all traffic movements when all the sites shown on this Plan are completed'*. Therefore, the Neighbourhood Plan will help limit the impact of new development on the transport network during the construction and delivery of new housing in the Neighbourhood Plan area.

Conclusions at this current stage

Potential significant effects

- 5.42 The assessment has concluded that the current version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the taking forward of provisions to effectively accommodate and manage the large scale of growth required in the village through the Local Plan, whilst supporting the vitality of the village and the quality of life of residents. They also relate to the Neighbourhood Plan's close focus on enhancing green infrastructure provision and promoting healthier lifestyles. In addition, through a close focus on supporting the accessibility of residents, reducing the need to travel and promoting sustainable transport use, the Neighbourhood Plan will bring significant positive effects in relation to the 'Transportation' theme.
- 5.43 The proposed policy provisions within the Neighbourhood Plan are also considered likely to lead to positive effects in relation to the Landscape and Historic Environment theme. These relate to the plan's close focus on protecting landscape and villagescape character, including relating to the setting of the Kent Downs AONB, initiating high quality design and the incorporation of high quality green infrastructure networks within new development areas. The Neighbourhood Plan also has a focus on conserving the fabric and setting of the historic environment. Positive effects are also anticipated relating to the 'Biodiversity and Geodiversity' theme through a focus on protecting existing habitats, enhancing ecological linkages, and initiating biodiversity-friendly design and layout. As such, in relation to these themes, the Neighbourhood Plan will help ensure that the potential impacts on landscape character, the historic environment and ecological networks from the scale of new development required in the Neighbourhood Plan area will be limited, and where possible, enhancements secured.
- 5.44 Significant permanent and long term negative effects have been identified in relation to the 'Land, Soil and Water Resources' SEA theme. This relates to the loss of the best and most versatile agricultural land as a result of Neighbourhood Plan allocations. However, this should be considered against the inevitable loss of land required to deliver the Local Plan housing allocation for the parish, and the limited opportunities for associated development to take place on previously developed land.

6. What are the next steps?

- 6.1 This Environmental Report accompanies the Lenham Neighbourhood Plan for submission to the Local Planning Authority, Maidstone Borough Council, for subsequent Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Maidstone Local Plan.
- 6.3 If Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by Maidstone Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Lenham Neighbourhood Plan will become part of the development plan for Lenham Parish.

Appendix A Context and Baseline review

A.1 Air quality

Policy Context

Key messages from the National Planning Policy Framework (NPPF) include:

- 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan'.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

In terms of the local context, Maidstone Borough Council is required to monitor air quality across the county under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO₂), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

Summary of current baseline

As of October 2017, there are no Air Quality Management Areas (AQMAs) within the Neighbourhood Plan area. The nearest AQMA covers Maidstone, approximately 12km to the west of the Neighbourhood Plan area. Declared in 2005 and amended in 2008 for exceedances in nitrogen dioxide (NO₂), the Maidstone AQMA encompasses the entire urban conurbation and the M20 between Junction 6 and 8.

Summary of future baseline

Whilst no significant air quality issues currently exist within the Lenham Neighbourhood Plan area, new employment and or housing provision within the parish have the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO₂.

Areas of particular sensitivity to increased traffic flows are likely to be village centre and the A20. However these effects may be offset in part by factors such as measures implemented through the Kent Local Transport Plan, which may alter traffic flows and encourage public transport use. The existing baseline for air pollutants is also low in Lenham parish; as such any increases are not likely to lead to significant air quality issues in the Neighbourhood Plan area.

A.2 Biodiversity

Policy Context

At the European level, the EU Biodiversity Strategy¹⁰ was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

Key messages from the National Planning Policy Framework (NPPF) include:

¹⁰ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed [30/01/17]

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively for 'green infrastructure' as part of planning for 'ecological networks'.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

The Natural Environment White Paper (NEWP)¹¹ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*¹².

Summary of Current Baseline

There are no European designated sites located within or adjacent to the boundaries of the Neighbourhood Plan area. At the national level, the Lenham Quarry Site of Special Scientific Interest (SSSI) is located in the northern part of the parish. Although there are no Local Nature Reserves or Local Wildlife Sites within the Neighbourhood Plan area, there is a network of ancient woodlands including the Kiln Wood Nature Reserve, containing habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC). Additionally, the Neighbourhood Plan area contains a variety of BAP Priority Habitats and Species, discussed below.

The Lenham Quarry SSSI

Designated in March 1987, the Lenham Quarry SSSI is approximately 4 ha in size and is located in the northern section of the Neighbourhood Plan area, adjacent to the 'Pilgrim's Way' footpath. The citation for the SSSI states the following¹³:

'This locality shows a section of the problematic Lenham Beds, variously ascribed in past accounts to the Miocene, Pliocene or the Pleistocene. The consensus of opinion presently assigns these rocks to the Pliocene

¹¹ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [03/10/17]

¹² DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed [03/10/17]

¹³ Natural England (no date): 'Lenham Quarry SSSI', [online] available to access via: <<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1000020>> last accessed [03/10/17]

time period, on the basis of their contained marine gastropod and bivalve faunas, as well as serpulid worms, brachiopods, bryozoans, scaphopods and echinoids. This fauna is important for it makes possible the placing of this deposit in a time period which is otherwise poorly represented in the rocks of the British Isles'.

Based on the most recent condition assessment undertaken in 2006, 100% of the SSSI is considered to be in 'favourable' condition.

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this context, an IRZ for all planning applications covers a 50m radius of the Lenham Quarry SSSI.

Locally Important Wildlife Sites

There is a network of Ancient and Semi-Natural Woodlands located within the Neighbourhood Plan area, including Dickley Wood, Oxley Wood, Dunstall Wood, Lower Wood, Gascoyne Wood, Affers Wood, Butts Bank, Lade Wood and Kiln Wood.

Managed by the Kent Wildlife Trust, Kiln Wood¹⁴ is also designated as a nature reserve and is located in the south western section of the Neighbourhood Plan area. The woodland consists mainly of oak, hazel and hornbeam with some field maple, willow and birch. Coppicing and ride management is carried out by staff and volunteers. The stream to the north is of particular biodiversity value. Lady fern, broad buckler-fern and herb-Paris are common. The pond in the northeast corner supports a good colony of water violet and is a great spot for birds such as woodcock and kingfisher.

Biodiversity Action Plan priority habitats

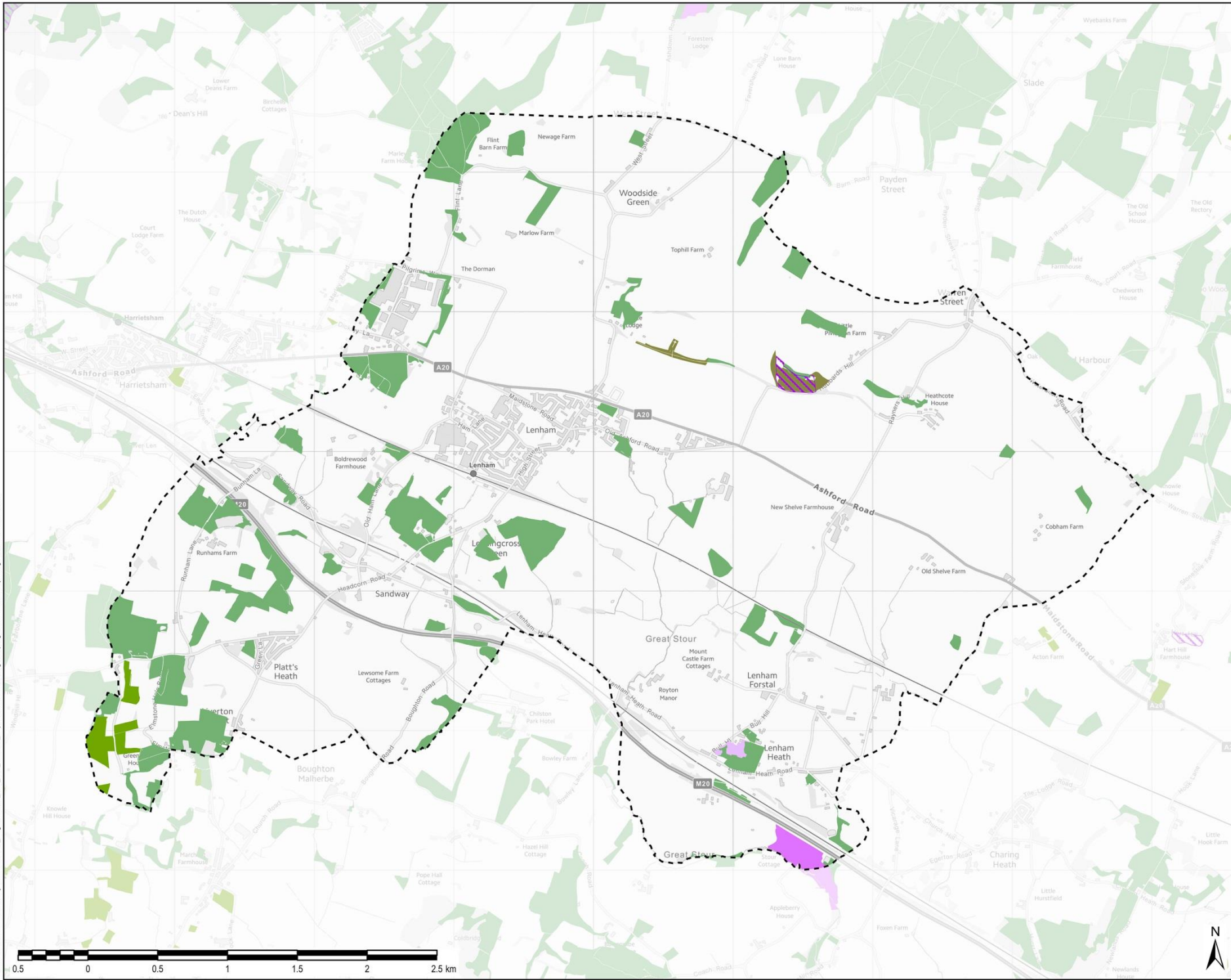
The Biodiversity Action Plan (BAP)¹⁵ priority habitats within the Neighbourhood Plan area include:

- A network of Deciduous Woodland predominantly concentrated in the south eastern section of the Neighbourhood Plan area, including the aforementioned Ancient and Semi-Natural Woodlands.
- A patch of Good Quality Semi-Improved Grassland located at the south eastern boundary of the Neighbourhood Plan area on land adjacent to the M20.
- Two areas of Lowland Calcareous Grassland located within the northern section of the Neighbourhood Plan area on land adjacent to the Pilgrim's Way and within the site boundary of the Lenham Quarry SSSI.
- An area of Lowland Heathland located in the south eastern section of the Neighbourhood Plan area, found within the boundary of a disused pit next to Bull Hill and Lenham Heath Road.
- Areas of Traditional Orchard located towards the south western boundary of the Neighbourhood Plan area on land surrounding the Elmstone Hole Conservation Area.

Figure 3.1 (overleaf) shows the designated biodiversity sites and BAP priority habitats located within the Neighbourhood Plan area.

¹⁴ Kent Wildlife Trust (no date): 'Kiln Wood', [online] available to access via: <<http://www.kentwildlifetrust.org.uk/reserves/kiln-wood>> last accessed [06/10/17]

¹⁵ MAGIC (2017): 'Interactive Map – Habitats and Species' [online database] available to access via: <<http://www.magic.gov.uk/MagicMap.aspx>> last accessed [06/10/17]



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LEGEND

- Lenham Neighbourhood Plan Area
- Site of Special Scientific Interest (SSSI)
- Biodiversity Action Plan Priority Habitats**
 - Deciduous Woodland
 - Good Quality Semi-improved Grassland
 - Lowland Calcareous Grassland
 - Lowland Heathland
 - Traditional Orchard

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Project Title: **STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE LENHAM NEIGHBOURHOOD PLAN**

Drawing Title: **BIODIVERSITY DESIGNATIONS AND HABITATS**

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Rev: **01**

Summary of Future Baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats. Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within decision making through policies within the Local Plan and local initiatives for biodiversity enhancements. For example the Lenham Meadows Trust has been recently formed to manage areas of biodiversity mitigation and enhancement resulting from the Neighbourhood Plan.

A.3 Climate Change

Policy context

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report to achieve the following:

- 'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?'¹⁶

The evidence report contains six priority risk areas requiring additional action in the next five years, see below:

1. Flooding and coastal change risks to communities, businesses and infrastructure;
2. Risks to health, well-being and productivity from high temperatures;
3. Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
4. Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
5. Risks to domestic and international food production and trade; and
6. New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

The UK Climate Change Act¹⁷ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.

- **Carbon Budgets.** The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page¹⁸.

¹⁶ GOV.UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:

<<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>> last accessed [27/01/17]

¹⁷ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [04/10/17]

¹⁸ Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>> last accessed [21/02/17]

Key messages from the National Planning Policy Framework (NPPF) include:

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in greenhouse gas (GHG) emissions, including in terms of meeting the targets set out in the Climate Change Act 2008¹⁹. Specifically, planning policy should support the move to a low carbon future through:
 - Planning for new development in locations and ways which reduce GHG emissions;
 - Actively supporting energy efficiency improvements to existing buildings;
 - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
 - Positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - Encouraging those transport solutions that support reductions in GHG emissions and reduce congestion.
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act²⁰ highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS)²¹

Further guidance is provided in the document 'Planning for SuDS'.²² This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

Summary of current baseline

In relation to GHG emissions, source data from the Department of Energy and Climate Change suggests that Maidstone Borough has had consistently lower per capita emissions total than that of both the South East of England and England as a whole since 2005. The borough has also seen an 18.2% reduction in the percentage of total emissions per capita between 2005 and 2012, greater than the reductions for the South East (15.9%) and England (16.7%).

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team²³. UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models.

¹⁹ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

²⁰ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

²¹ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDS.

²² CIRIA (2010) 'Planning for SuDS – making it happen' [online] available to access via http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx last accessed [04/04/17]

²³ The data was released on 18th June 2009: See: <http://ukclimateprojections.metoffice.gov.uk/> last accessed [04/02/17]

Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the South East of England by 2050 for a medium emissions scenario²⁴ are likely to be as follows:

- The central estimate of increase in winter mean temperature is 2.2°C and an increase in summer mean temperature of 2.8°C; and
- The central estimate of change in winter mean precipitation is 16% and summer mean precipitation is – 19%.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area. These include:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and flooding of roads

The entirety of the Neighbourhood Plan area is located within Flood Risk Zone 1, showing that there is a >0.1% chance (1 in 1000) of flooding in any given year.

Comparatively, surface water drainage and sewer flooding is a risk for some parts of the Neighbourhood Plan area, with sections of medium-high risk in the central and eastern parts of the Neighbourhood Plan area, along the highways network and land adjacent to streams and drainage ditches. The most recently completed Level 1 Strategic Flood Risk Assessment (SFRA) for Maidstone Borough in 2016 states that previous incidents of sewerage flooding have occurred in areas surrounding Lenham.

To the east of the village are the ancient water meadows which constitute the head waters of the River Stour. In times of sustained (winter) rainfall these areas are prone to flooding caused by a rising water table. In this context Old Ashford Road suffers from regular groundwater flooding as it is in the vicinity of the spring heads for the River Stour. Some cellars in the vicinity of these springs have also been reported to have flooded due to groundwater.

Summary of future baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.

A Critical Drainage Area (CDA) is a discrete geographic area where multiple and interlinked sources of flood risk causes flooding in one or more Local Flood Risk Zones (LFRZ) during severe weather, impacting people, property and/or local infrastructure. Maidstone Borough Council may wish to designate their own CDAs (in the absence of any designations from the Environment Agency) within the Neighbourhood Plan area within the future, for reasons such as surface water capacity issues

²⁴ UK Climate Projections (2009) South East 2050s Medium Emissions Scenario [online] available at: <http://ukclimateprojections.metoffice.gov.uk/23907?emission=medium> last accessed [28/03/17]

In terms of climate change contribution, GhG emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of GhG emissions.

A.4 Landscape and historic environment

Policy context

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- Develop 'robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics'.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Government's Statement on the Historic Environment for England sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

At the regional level, the 2014-2019 Management Plan for the Kent Downs AONB has the following 20-year vision and sets out eight policies to help achieve it:

'In 2034, the qualities and distinctive features of the Kent Downs AONB are valued, secured and strengthened'

The vision, policies and actions in the AONB Management Plan will be supported, promoted and delivered through strong collaborate partnerships with local authorities and communities.

Baseline summary

Landscape

The Kent Downs AONB

The northern section of the Neighbourhood Plan area is located within the boundary of the Kent Downs AONB. Designated in 1968, the AONB is 878km² and extends from the White Cliffs of Dover to the Surrey border. The rich landscape of the AONB includes dramatic landforms and views, from the south facing steep slopes (scarps), biodiversity-rich habitats and a legacy of historic and cultural significance. Described as one of the most '*enchanting landscapes of southern Britain*' within the 2014-2019 AONB Management Plan, the diversity of the Kent Downs is defined and shaped by the isolated farmsteads, churches castles and coasts, the network of ancient mixed woodlands and the delicate chalk grasslands.

Wealden Greensand NCA

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Neighbourhood Plan area is located within two NCAs, NCA 119 'North Downs' and NCA 120 'Wealden Greensand'.

The following key characteristics of NCA 119 'North Downs' of particular relevance to the Neighbourhood Plan area²⁵ are as follows:

- Cretaceous Chalk forms the backbone of the North Downs. A distinctive chalk downland ridge rises up from the surrounding land, with a steep scarp slope to the south providing extensive views across Kent.
- Chalk soils are predominant across the NCA but the upper part of the dip slope is capped by extensive clay-with-flint deposits. Patches of clay and sandy soils also occur with coombe deposits common in dry valleys.
- The south-facing scarp is incised by a number of short, bowl-shaped dry valleys, cut by periglacial streams and often referred to as combes. The undulating topography of the dip slope has also been etched by streams and rivers, today forming dry valleys, some of which carry winterbournes that occasionally flow in the dip slope, depending on the level of the chalk aquifer.
- The footslope of the escarpment supports arable cropping, the dominant land use within the NCA. In the east, the richer, loamy soils of the lower dip slope support large tracts of mixed arable and horticultural production.
- Tracts of species-rich chalk grassland and patches of chalk heath are important downland habitats and of international importance.
- Ancient paths, drove roads and trackways, often sunken, cross the landscape and are a distinctive feature of the dip slope.
- Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern, with local flint, chalk and Wealden brick the vernacular materials.

The following key characteristics of NCA 120 'Wealden Greensand' of particular relevance to the Neighbourhood Plan area²⁶ are as follows:

- A long, narrow belt of Greensand, typified by scarp-and-dip slope topography;
- Extensive areas of ancient mixed woodland of hazel, oak and birch;
- Semi-natural habitats include remnant lowland heathland and unimproved acid grasslands found in the commons, parklands, heathlands and other areas of unimproved pasture;
- Fields are predominantly small or medium, in irregular patterns derived from medieval enclosure. Boundaries are formed by hedgerows, with character and species reflecting the underlying soils;
- Agricultural land comprises a mosaic of mixed farming, with pasture and arable land set within a wooded framework; and
- The rural settlement pattern is a mixture of dispersed farmsteads, hamlets and some nucleated villages. Large houses set within extensive parks and gardens are found throughout the area.

Maidstone LCA

At the local level, the Maidstone Landscape Character Assessment (LCA)²⁷ describes the variations in character between different areas and types of landscape in the district and was completed in 2012. It provides an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in the borough. Additionally, it also sets out strategies and guidelines for the protection, management and planning of the landscape. The Neighbourhood Plan area is located within five Landscape Character Types (LCT) described below:

- The 'Valleys' LCT covers approximately 10% of the Neighbourhood Plan area and is located within the southern section. The largely undulating landscape contains mixed farmlands, areas of heathland, and historic parklands (including the Grade II listed Chilston Park).
- The 'Greensand Orchards and Mixed Farmlands' LCT covers approximately 10% of the Neighbourhood Plan area and is located within the southern section. The landscape comprises a large belt of Greensand

²⁵ Natural England (2013): 'NCA Profile 120: Wealden Greensand', [online] available to download via: <http://publications.naturalengland.org.uk/publication/5331490007154688?category=587130> last accessed [05/10/17]

²⁶ Natural England (2013): 'NCA Profile 120: Wealden Greensand', [online] available to download via: <http://publications.naturalengland.org.uk/publication/5331490007154688?category=587130> last accessed [05/10/17]

²⁷ Maidstone Borough Council (2012): 'Maidstone Landscape Character Assessment', [online] available to download via: <http://www.maidstone.gov.uk/residents/planning/local-plan/evidence> last accessed [05/10/17]

which forms the dip slope of the Greensand ridge, with the major transport routes of the M20 passing through areas of heathland and ancient woodlands.

- The 'Gault Clay Vale' LCT covers approximately 20% of the Neighbourhood Plan area and is located within the central section. From the vale, panoramic views of the North Downs escarpment are often available. The land use is mixed, but predominantly comprises large arable fields interspaced by hedgerows and mixed ancient woodland blocks. The distinctive 'Pilgrim's Way' follows the topographic contours to the north.
- The 'Chalk Scarp Landscape' LCT covers approximately 10% of the Neighbourhood Plan area and is located within the central section. The steep chalk escarpment is a striking and dramatic landscape feature which is incised by a number of dry valleys.
- The 'Dry Valleys and Downs' LCT covers approximately 50% of the Neighbourhood Plan area is located within the northern section. The landscape forms part of the Kent Downs AONB and is characterised by an open and expansive landform emphasised by ancient woodland.

Historic Environment

The Neighbourhood Plan area has a rich and diverse historic environment.

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains two Grade I, six Grade II* and 96 Grade II listed buildings.

The Grade I listed buildings are as follows:

- Church of St. Mary; and
- Barn circa 40 yards North West of Court Lodge.

The Grade II* listed buildings are as follows:

- Corner House Lenham Greengrocers Rebecca's Antiques and Furnishings;
- 14, 15 and 16, The Square;
- Honeywood;
- Forge House;
- Lenham Court; and
- Royton Manor

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England²⁸, there is one scheduled monument located in the built-up area of Lenham, named 'Lock Up, Lenham'²⁹. The 'Lock Up', also known as round houses, blind houses and clinks, was a temporary holding place for offenders being brought before the magistrates.

Historic parks and gardens are noted as a fragile and finite resource by Historic England³⁰, as they can easily be damaged beyond repair or lost forever. Designated in May 1986, the Grade II listed 'Chilston Park'³¹ is partly located within the southern section of the Neighbourhood Plan area. The 78 ha of the site comprises some 6 ha of formal and ornamental gardens to the north and south of the house, set within 72 ha of parkland and woodland.

Conservation areas are designated because of their special architectural and historic interest³². Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and

²⁸ Historic England: National Heritage List for England: <<http://list.historicengland.org.uk>> last accessed [09/05/2017.]

²⁹ Historic England (2017): 'Lock Up, Lenham', [online] available to access via: <<https://historicengland.org.uk/listing/the-list/list-entry/1005138>> last accessed [05/10/17]

³⁰ Historic England (2017): 'Registered Parks and Gardens' [online] available at: <<https://www.historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/>> last accessed [06/07/17]

³¹ Historic England (2017): 'Chilston Park' [online] available to access via: <<https://historicengland.org.uk/listing/the-list/list-entry/1000522>> last accessed [05/10/17]

³² Historic England (2017): 'Conservation Areas', [online] available to access via: <<https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>> last accessed [27/03/17]

providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England³³. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area, and can be developed into a management plan. As of October 2017 there are four Conservation Areas within the Neighbourhood Plan area, outlined below. None of these have had conservation area appraisals or management plans undertaken.

- The 'Lenham Elmstone Hole' Conservation Area is located within the south western section of the Neighbourhood Plan area and contains four Grade II listed buildings.
- The 'Lenham Liverton Street Conservation Area is located within the south western section of the Neighbourhood Plan area and contains five Grade II listed buildings.
- The 'Sandway' Conservation Area is located within the south western section of the Neighbourhood Plan area and includes parts of Headcorn Road and Lenham Heath Road.
- The 'Lenham' Conservation Area is located within the centre of the Neighbourhood Plan area and covers the majority of the built-up section of the town. It includes two Grade I and four Grade II* listed buildings, along with the Lock Up Lenham scheduled monument.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. The 2016 Heritage at Risk Register for South East England³⁴ highlights that the following historic features within the Neighbourhood Plan area are at risk:

- The medieval Church of St Mary is considered to be in 'poor condition' and at immediate risk of further rapid deterioration or loss of fabric. In 2014, the Heritage Lottery Fund grant was secured to carry out repairs to the roof, walls and windows; scheduled for completion in 2016; and
- Lenham Elmstone Hole Conservation Area is considered to be in 'poor condition' with a medium vulnerability to further deterioration.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are seen as important by local communities. For example, the Kent Historic Environmental Record³⁵ has over 200 entries for Lenham parish and includes archaeological sites, finds and buildings. Figure 5.1 (overleaf) shows the designated landscapes and designated historic environment assets located within the Neighbourhood Plan area.

Summary of future baseline

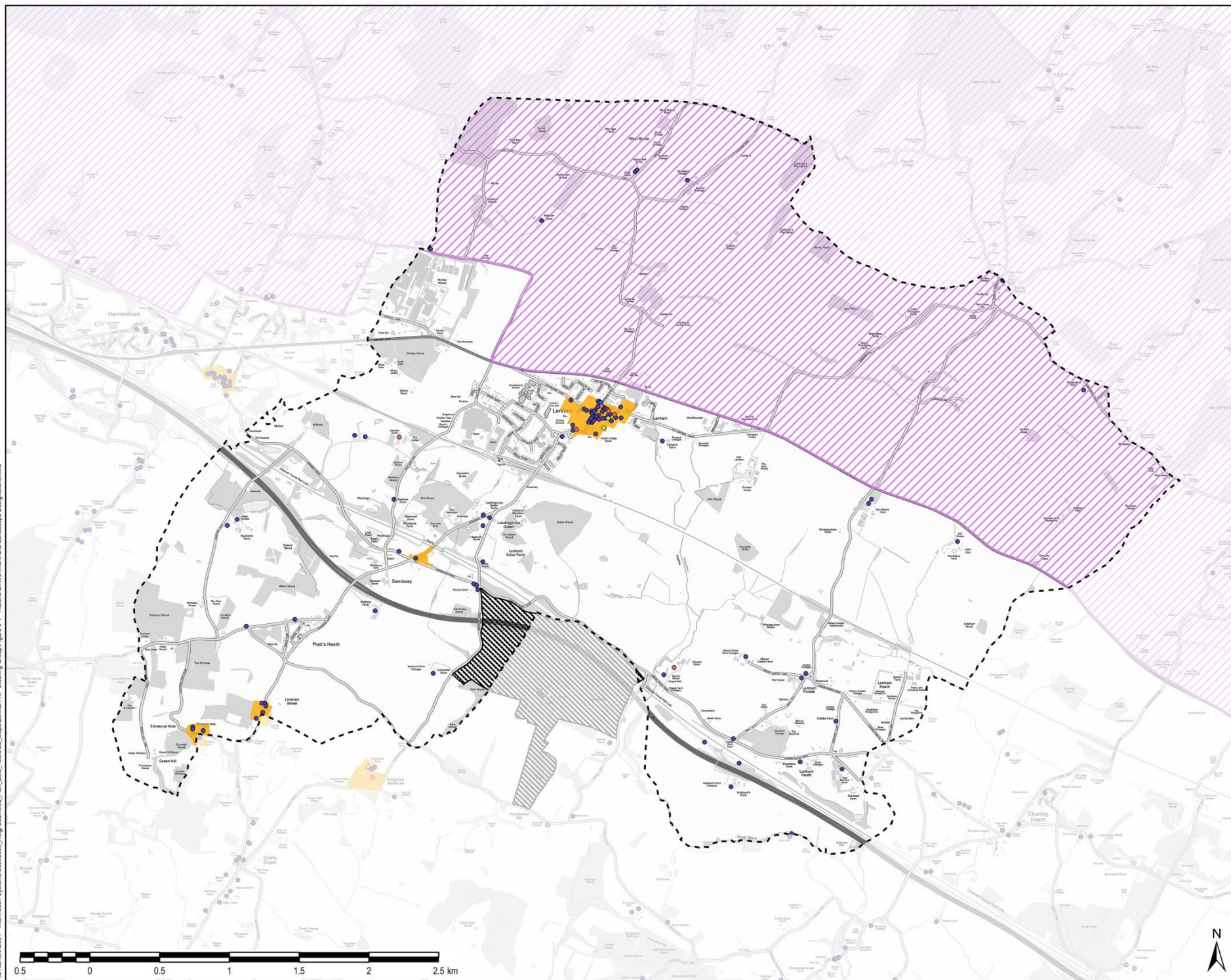
New development areas in the Neighbourhood Plan area proposed through the Local Plan have the potential to impact on the fabric and setting of cultural heritage assets; for example through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to cultural heritage assets and their settings. Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there is opportunity for new development to enhance the historic setting of the village and better reveal assets' cultural heritage significance. The development and implementation of appraisals and management plans for the four conservation areas within the Neighbourhood Plan area could further protect and enhance their historical assets.

New development has the potential to lead to incremental but small changes in landscape and townscape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and visual impact

³³ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [27/03/17]

³⁴ Historic England (2016): 'Heritage at Risk 2016 Register – South East', [online] available to download via: <<https://www.historicengland.org.uk/images-books/publications/har-2016-registers/>> last accessed [29/03/17]

³⁵ Kent County Council (2017): 'Exploring Kent's Past: Historic Environmental Record' [online] available to access via: <<http://webapps.kent.gov.uk/KCC.ExploringKentsPast.Web.Sites.Public.Default.aspx>> last accessed [05/10/17]



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LEGEND

- Lenham Neighbourhood Plan Area
- Record of Scheduled Monument
- Registered Parks and Garden
- Conservation Area
- Kent Downs Area of Outstanding Natural Beauty

Listed building

- Grade I
- Grade II
- Grade II*

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Conservation Areas were digitised indicatively from Historic England data

Purpose of Issue
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Project Title
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Drawing Title
HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS

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A.5 Land, Soil and Water Resources

Policy context

The EU's Soil Thematic Strategy³⁶ presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England³⁷, which sets out a vision for soil use in England, and the Water White Paper³⁸, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England³⁹ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

Summary of current baseline

Land Quality

The Neighbourhood Plan area does not have a history of heavy industrial land use. This does not preclude the potential for localised soil or groundwater contamination to be present, particularly on land surrounding the built-

³⁶ European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> last accessed [30/01/17]

³⁷ Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [30/01/17]

³⁸ Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [30/01/17]

³⁹ Defra (2011) Government Review of Waste Policy in England [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [30/01/17]

up areas. There has been one recorded significant industrial pollution incident by the Environment Agency under the EC Integrated Pollution Prevention and Control Directive (IPCC) on the 18th July 2004. There were significant impacts to water from the oil and fuel pollutants released through the incident.

Quality of Agricultural Land

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. In terms of the location of the best and most versatile agricultural land, a detailed classification has been undertaken within the Neighbourhood Plan area in some locations:

- There are patches of Grade 1 agricultural land adjacent to Lenham Heath Road and Chapel Farm, towards the southern boundary of the Neighbourhood Plan area;
- There are patches of Grade 2 agricultural land adjacent to Pleasant Farm and land adjacent to Ashford Road and Tanyard Farm, in the central section of the Neighbourhood Plan area; and
- There is a patch of Grade 3b agricultural land adjacent to the Stour Valley Walk on Court Lodge Farm, in the central section of the Neighbourhood Plan area.

Watercourses

Although there are no main rivers flowing through the Neighbourhood Plan area, there is a network of small tributaries connecting 1) to the River Len, which flows into the Medway at Maidstone and 2) the Great Stour, which flows through Ashford and Canterbury. The headwaters for both the Len and the Great Stour are within the Neighbourhood Plan area. The Neighbourhood Plan area is part of the Kentish watershed, with the River Len flowing into the Thames Basin and the River Stour flowing into the South East Basin; as such the two are covered by separate River Basin Management Plans.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. Land to the north of the A20 is located within Zone 3 'Total Catchment', defined as 'the area around a source within which all groundwater recharge is presumed to be discharged at the source. There are two additional SPZs located within 1km of the Neighbourhood Plan area, including Zone 1 (Inner Zone) and Zone 2 (Outer Zone).

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs), and as such, they are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. NVZs for 2017-2020 started on January 1st 2017, including new areas of NVZs and excluding areas that have been de-designated. The majority of the Neighbourhood Plan area is situated within the Great Stour River Surface Water NVZ, defined as 'areas of land that drain into a freshwater body which has, or could have if action is not taken, a nitrate concentration greater than 50 mg/l'.

Summary of future baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improving recycling and composting rates.

In terms of water quality, the requirements of the Water Framework Directive (and its replacement) are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality has the potential to be affected by pollution incidents in the area, the presence of non-native species and future physical modifications to water bodies.

A.6 Population and community

Policy Context

Key messages from the National Planning Policy Framework (NPPF) include:

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change warns that society is underprepared for an ageing population. The report states that 'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

Population

The population of Lenham increased at a slower rate between 2001 and 2011 in comparison to Maidstone Borough, the South East of England and England. Notably, the population of Maidstone Borough has increased at a faster rate in comparison to the regional and national trends. Based on the 2011 census data, approximately 2.2% of the population of Maidstone live within the Neighbourhood Plan area.

Age Structure

Generally, there are a larger number of residents within the 60+ age category within the Neighbourhood Plan area (28.8%) in comparison to the totals for Maidstone (23.7%), the South East (23.3%) and England (22.3%). In contrast there are a similar number of residents within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (45.6%) in comparison to the totals for Maidstone (46.8%), the South East of England (46.4%) and England (46.9%). Additionally, there are fewer younger residents (0-15 and 16-24) in the Neighbourhood Plan area (25.6%) compared with the totals for Maidstone (29.6%), the South East of England (30.2%) and England (30.8%).

Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.
- Based on the information presented in Table 7.3, fewer households are deprived in 1 or more dimensions within the Neighbourhood Plan area (53.7%), Maidstone (52.8%) and the South East of England (52.3%) in comparison to the national average (57.5%). Out of the 53.7% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in one or two dimensions, which is similar to the regional and national averages.

Index of multiple deprivation

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 1. 'Geographical Barriers': relating to the physical proximity of local services
 2. 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 3. 'Indoors Living Environment' measures the quality of housing.
 4. 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs

are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

There are two LSOAs that are either fully or partially in the Neighbourhood Plan area: Analysis of the data presented in Table 7.4 below reveals the following inferences:

General Trends

E01024361: Maidstone 011A covers approximately 15% of the Neighbourhood Plan area and includes the majority of the built-up area of Lenham. There are notable contrasts between the IMD categories. The LSOA is within the top 30% least deprived deciles for the crime domain, barriers to housing and services domain, living environment domain, geographical barriers sub-domain and the outdoors sub-domain. Comparatively, the LSOA is within the top 40% most deprived deciles for the education, skills and training domain, the children and young people sub-domain and the adult skills sub-domain. Overall, this LSOA is one of the top 40% least deprived in England.

E01024362: Maidstone 011B covers approximately 85% of the Neighbourhood Plan area and is predominantly rural in character. There are notable contrasts between the IMD categories. The LSOA is within the top 20% least deprived deciles for the employment domain, health deprivation and disability domain and the income deprivation affecting children index domain. Comparatively, the LSOA is within the top 20% most deprived deciles for barriers to housing and services domain and the geographical barriers sub-domain. Overall, this LSOA is one of the top 30% least deprived in England.

Similarities between the LSOAs

Poor performance (top 40% most deprived deciles)

- Both LSOAs are within the top 40% least deprived deciles for the overall IMD domain, the crime domain, the income deprivation affecting children index domain, the income deprivation affecting older people domain and the outdoors sub-domain.

Good performance (top 40% least deprived deciles)

- Notably, neither of the two LSOAs within the Neighbourhood Plan area both fall within the top 40% least deprived categories for any of the IMD categories.

Contrasts between the LSOAs

- E01024361: Maidstone 011A is within the top 40% most deprived deciles for the education, skills and training domain, and the adult skills sub-domain. Comparatively, E01024362: Maidstone 011B is within the top 40% least deprived deciles for the same IMD categories.
- E01024361: Maidstone 011A is within the top 30% least deprived decile for the barriers to housing and services domain. Comparatively, E01024362: Maidstone 011B is within the top 20% most deprived decile for the same IMD category.
- E01024361: Maidstone 011A is within the top 30% most deprived decile for the children and young people sub-domain. Comparatively, E01024362: Maidstone 011B is within the top 40% least deprived decile for the same IMD category.
- E01024361: Maidstone 011A is within the top 40% least deprived decile for the indoors sub-domain. Comparatively, E01024362: Maidstone 011B is within the top 40% most deprived decile for the same IMD category.

Housing tenure

Within the Neighbourhood Plan area, 76.4% of residents either own their home outright or with a mortgage, compared to 70.5% for Maidstone, 67.6% for the South East and 63.3% for England. There are also fewer residents within socially rented and private rented accommodation in the Neighbourhood Plan area (9.8% and 11.4% respectively) in comparison to the regional and national trends.

Highest level of qualification

Based on the 2011 census data, 22.9% of residents in the Neighbourhood Plan area have no qualifications, higher than the percentages for Maidstone (20.7%), the South East (19.1%) but aligning with the national total (22.5%). Notably, there are fewer residents with Level 4 qualifications in the Neighbourhood Plan area (25.3%),

compared with the totals for the South East (30.0%) and England (27.4%), however this is broadly similar to the total for Maidstone (25.6%).

Employment

In regards to employment within the Neighbourhood Plan area, the following three occupation categories support the most residents:

- Managers, directors and senior officials (14.5%);
- Professional occupations (14.5%); and
- Skilled trades occupations (14.5%).

Overall, 43.5% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, compared with 40.5% for Maidstone, 42.1% in the South East and 39.8% in England. However there are notable contrasts between the occupation categories, with the Neighbourhood Plan area having a higher percentage of residents within the 'managers, directors, senior officials' and 'skilled trade occupations' categories and a lower percentage of residents within the 'professional occupations' category in comparison with the regional and national trends. Additionally, there are fewer residents within the Neighbourhood Plan area employed in 'sales and customer experience occupations' (5.2%) in comparison to Maidstone (7.6%), the South East (7.9%) and England (8.4%).

Summary of future baseline

The population of the Neighbourhood Plan area increased at a slower rate between the years 2001-2011 in comparison to the increases observed in Maidstone, the South East of England and England. However significant housing numbers are earmarked for the Neighbourhood Plan area in the period to 2031, which will lead to an increased level of population growth

28.8% of residents are aged 60+, indicating the presence of an older population within the Neighbourhood Plan area. In common with other areas, the population of the Neighbourhood Plan area is ageing.

There are notable contrasts in the levels of deprivation within the two LSOAs in the Neighbourhood Plan area, particularly between the education, skills and training domain, the children and young people sub-domain, the indoors sub-domain and the barriers to housing and services domain. The suitability of housing for local requirements depends in part on the successful implementation of policies outlined in the Local Plan.

A.7 Health and wellbeing

Policy context

Key messages from the NPPF include:

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities'
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives⁴⁰ ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning

⁴⁰ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <http://www.apho.org.uk/resource/item.aspx?RID=106106> last accessed [27/01/17]

and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

At the local level, the vision for the ‘Kent Joint Health and Wellbeing Strategy 2014-2017’⁴¹ is ‘to improve health and wellbeing outcomes, deliver a better coordinated quality care, improve the public’s experience of integrated health and social care services, and ensure that the individual is involved and at the heart of everything we do’. The following outcomes aim to support the delivery of this vision, and are informed by the Joint Strategic Needs Assessment:

- Every child has the best start in life;
- Effective prevention of ill health by people taking greater responsibility for their health and wellbeing;
- The quality of life for people with long term conditions is enhanced and they have access to good quality care and support;
- People with mental health issues are supported to ‘live well’; and
- People with dementia are assessed and treated earlier, and are supported to live well.

Current baseline

General health

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 7. As highlighted in Figure 8.1, 82.8% of residents the Neighbourhood Plan area consider themselves as having ‘very good health’ or ‘good health’, broadly aligning to the totals for Maidstone (83.2%) and the South East of England (83.6%), but higher than the total for England (81.4%). Contrastingly, the number of residents in the Neighbourhood Plan area considering themselves to have ‘bad health’ or ‘very bad health’ is 4.4%, similar to the regional totals but lower than the national total.

Disability

In general terms, residents within the Neighbourhood Plan area who report that their activities are limited ‘a little’ or ‘not limited’ broadly align to the totals for Maidstone, the South East of England and England. In contrast, there are fewer residents who report that their activities are limited ‘a lot’ in comparison to the national total. However, this value broadly aligns with the regional totals.

Summary of future baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting ‘good’ or ‘very good’ health, and a low percentage of residents reporting that their activities are limited in some way.

An ageing population within the Neighbourhood Plan area might place future pressures on health services in the area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing over the long term.

In addition to the main challenges outlined in the Joint Health and Wellbeing Strategy for Kent, obesity is seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

⁴¹ Kent County Council (2017): ‘Kent Joint Health and Wellbeing Strategy 2014-2017’ [online] available to download via: <http://www.kpho.org.uk/joint-strategic-needs-assessment/about-the-jsna/what-makes-up-the-jsna-process> last accessed [06/10/17]

A.8 Transportation

Policy Context

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Implemented in 2016 by Kent County Council, the 'Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031)' outlines the following ambition:

'To deliver safe and effective transport, ensuring that all Kent's communities and businesses benefit, the environment is enhanced and economic growth is supported'

The following five policies will support this ambition⁴²:

- Policy 1: Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population;
- Policy 2: Promote affordable, accessible and connected transport to enable access for all to jobs, education, health and other services;
- Policy 3: Provide a safer road, footway and cycleway network to reduce the likelihood of casualties, and encourage other transport providers to improve safety on their networks;
- Policy 4: Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment; and
- Policy 5: Provide and promote active travel choices for all members of the community to encourage good health and wellbeing, and implement measures to improve local air quality.

Current baseline

Rail Network

Residents within the Neighbourhood Plan area have access to Lenham Station, located in the south western part of the parish. There are hourly services direct to London Victoria (journey time approximately 75 minutes), Canterbury West (journey time approximately 50 minutes) and Ashford International (journey time approximately 15 minutes). Ashford International Station is located approximately 5 km to the south east of the Neighbourhood Plan area, providing more frequent and high speed services to a variety of London stations (including St Pancras, Victoria and Charing Cross) and also forms part of the 'Eurostar' service.

Bus Network

In regards to the bus network, as of October 2017 the principal route through the Neighbourhood Plan area is the 10X⁴³. Operated by Stagecoach, the service connects residents to the local towns and villages of Ashford, Charing, Harrietsham and Maidstone. There are regular daily services between 07:00 and 18:00, roughly every hour.

Road Network and Congestion

The Neighbourhood Plan area is well connected to the national road network. Key routes are as follows:

⁴² Kent County Council (2016): 'Local Transport Plan 4: Delivering Growth without Gridlock', [online] available to download via: <<http://www.kent.gov.uk/about-the-council/strategies-and-policies/transport-and-highways-policies/local-transport-plan>> last accessed [06/10/17]

⁴³ Traveline South East & Anglia (2017): 'Find a Timetable', [online] available to access via: <http://www.travelinesoutheast.org.uk/se/XSLT_SELTT_REQUEST?language=en> last accessed [06/10/17]

- The M20 passes through the southern part of the Neighbourhood Plan area, connecting residents to Folkestone and Dover (approximately 30 km to the south east) and Maidstone and London (approximately 50 km to the north west).
- The A20 passes through the southern part of the Neighbourhood Plan of the Neighbourhood Plan area, connecting residents to Ashford (approximately 15 km to the south east) and Maidstone (approximately 15 km to the north west).
- The majority of the Neighbourhood Plan area is accessible via minor roads, with key routes including Headcorn Road, Boughton Road and Lenham Heath Road.

Cycle and Footpath Network

The North Downs Way, or 'Pilgrim's Way'⁴⁴, is a footpath extending approximately 250 km from Farnham to Canterbury and the White Cliffs of Dover. The route passes through the northern section of the Neighbourhood Plan area, with long views to the south over the built-up parts of Lenham. Additionally, the 'Stour Valley Walk' extends approximately 83 km that follows the Great Stour River through the Low Weald and Kent Downs, from its source at Lenham to its estuary at Pegwell Bay.

In regards to the National Cycle Network, Route 17⁴⁵ extends approximately 67 km between Rochester and Ashford, following the line of the North Downs Way.

Availability of cars

Based on the 2011 census data, 87.1% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the percentages for Maidstone (83.9%), the South East (81.4%) and England (74.2%).

Travel to work

The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (46.7%), higher than the totals for Maidstone (44.3%), the South East (41.3%) for England (36.9%). A higher percentage of residents in the Neighbourhood Plan area choose to walk to work, catch a train to work, or work mainly from home in comparison to the regional and national trends. In contrast, fewer residents choose to cycle to work or catch a bus, minibus or coach to work in composition to the regional and national trends. 29.5% of resident within the Neighbourhood Plan area are not in employment, compared with 31.0% for Maidstone, 32.1% for the South East of England and 35.3% for England.

Future baseline

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, particularly along the existing highways network. Given good public transport links, ridership levels are likely to increase.

Whilst negative effects of new development on the transport network may be mitigated in part by the latest Local Transport Plan, there will be a continuing need for development to be situated in accessible locations which limit the need to travel by private car.

⁴⁴ Pilgrims Way (2017): 'The Route', [online] available to access via: <<http://www.pilgrimswaycanterbury.org/the-way/>> last accessed [06/10/17]

⁴⁵ Sustrans (no date): 'National Cycle Network: Route 17', [online] available to access via: <<https://www.sustrans.org.uk/ncn/map/route/route-17>> last accessed [06/10/17]

