

Date: 23 April 2020  
Our ref: 309574  
Your ref: Lenham Neighbourhood Plan – Regulation 16



Maidstone Borough Council  
Maidstone House  
King Street  
Maidstone  
Kent

ME15 6JQ

**BY EMAIL ONLY**

Dear Nicola Stokes,

**Planning consultation:** Lenham Neighbourhood Plan 2017-2031 - Regulation 16 - Maidstone Borough Council

Thank you for your consultation on the above dated 12 February 2020 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### **Regulation 16 consultation**

#### **Summary of Natural England Response – A greater emphasis is needed on high quality design input in the masterplan to ensure sensitivity to the Kent Downs AONB.**

Natural England focuses its responses to Neighbourhood Plans where there is the greatest impact on our areas of interest (nature conservation, landscape, soils, access to the environment) or opportunity for gains. For Lenham Neighbourhood Plan, our concerns relate to the potential landscape and visual impacts of the allocation sites proposed in the Lenham Neighbourhood plan Area on the Kent Downs Area of Outstanding Natural Beauty (AONB).

#### **Policy D1: Quality Design**

- Natural England recommends that policy D1.7. requiring the design of new development to be 'mindful' of Lenham's location in the immediate foreground of AONB should be strengthened to align with Maidstone Local plan Policy SP.8. For example we would recommend the policy to require that 'the design of new developments should have regard for Lenham's location in the immediate foreground of the Kent Downs AONB to avoid significant adverse impact on the setting'.

#### **Policy SHDS1: Strategic Housing Delivery Sites (SHDS)**

We understand that the Maidstone Local Plan Policy SP.8 'identified Lenham as a broad location for growth for the delivery of approximately 1,000 dwellings'. The policy also stated that 'housing sites should avoid significant adverse impact on the setting of the AONB'. This is reflected in Lenham's Neighbourhood Plan policy D1.7. 'The design of new development shall be mindful of Lenham's location in the immediate foreground of the AONB'. However Natural England has concerns that not all of the strategic housing delivery sites avoid impacts on the setting of the Kent Downs AONB and therefore may not fully comply with the policies in the Maidstone Local Plan.

#### Area 1: North East of Lenham Village Extension

- We note that in the Strategic Environment Assessment, one of the noted impacts of Potential Areas of Growth 7 – Land South of Ashmills Business Park and West of East Lenham, was that due to the sloping topography, walkers using the North Downs Way National Trail/Pilgrim's Way long distance footpath will have direct views of the allocation from the Kent Downs AONB. This allocation corresponds to Area 1 in the neighbourhood plan. In addition the Landscape and Visual Impact Assessment (LVIA) found that SHDS1 would be viable from viewpoint: Lenham Quarry SSSI and that sensitivity of the view was high. Therefore a more detailed LVIA undertaken in accordance with the *Guidelines for Landscape and Visual Impact Assessment* (GLVIA 3rd edition) should be used to inform the design, scale and layout of the site to ensure it is sensitive to the Kent Downs AONB. In addition the suitability and effectiveness of mitigation and enhancement measures need to be carefully considered. High density housing may not be suitable in this location due to the associated change in landscape character. Any development at this site would need to incorporate features which maintain and enhance the rural and open landscape of the site, and the green infrastructure network in order to ensure the neighbourhood plan complies with paragraph 127 and 170 of the NPPF.

#### General comments for all allocations:

- As parts of Lenham are within the Kent Downs Area of Outstanding Natural Beauty (AONB), all development must protect and enhance the character of the Kent Downs AONB as per policies 4.106 – 4.110 of the Maidstone Local Plan. Lenham Parish Council and the Neighbourhood Plan should conserve and enhance these characteristics in line with the objectives of the Kent Downs AONB Management Plan.
- The allocation sites have the potential to result in changes to the key characteristics of the Kent Downs AONB by impacting short and long distance views. The LVIA produced has found that all 7 SHDS can be seen from one of the 7 chosen viewpoints. A thorough assessment through the LVIA process should therefore be used to inform the site design and layout, to ensure they are driven by the capacity of the landscape and comply with policies 4.106 – 4.110 of the Maidstone Local Plan.
- Although it is pleasing to see a Masterplanning Report has been produced, further detail is needed. Given the sensitive location of Lenham Village in the setting of the Kent Downs AONB the masterplan should be used to lead the strategic housing delivery to ensure appropriate mitigation and enhancement measures are embedded in the design from the outset. The master plan therefore needs further details to show consideration for the function, design and management of the allocation sites to ensure they meet the needs of the development and the local communities whilst conserving and enhancing the setting of the Kent Downs AONB.
- Natural England advises that any advice provided by the Kent Downs AONB unit on these allocations is given full consideration. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the Kent Downs AONB management plan, will be a valuable contribution. In particular we agree with their recommendation for the requirement for structural tree planting.
- Natural England advises that these developments provide a key opportunity to provide a demonstrable net gain in biodiversity. Net gain through development is a key principle in the government's [25 Year Environment Plan](#), and Defra has recently consulted on making it mandatory. It is also required by national planning policy in the [National Planning Policy Framework](#). Biodiversity net gain should therefore be sought for all allocations, in the form of on-site or off-site enhancements.
- Natural England advise that Sustainable urban Drainage Systems (SuDS) should be considered where possible.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

[REDACTED] For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Amy Croombs  
Sustainable Development - Sussex and Kent