

## HEARING SESSION 7 – RURAL SERVICE CENTRES

### Matter 2      Lenham

#### **7.3 Should the Local Plan identify that specific sites in the Broad Location are to be allocated by means of a review of the Local Plan?**

7.3.1 Yes. There is insufficient information available to this Local Plan Examination to make detailed allocations. Consultation has been based on two large stars on a map of the Lenham area on page 169 of the Reg. 19 consultation, not specific proposals. Paragraph 5.52 states that “the precise scale and location of future development will depend on further studies...”. If, as we propose, development should extend south of Lenham in preference to some of the development to east and west of the village, proper opportunity should be given for anyone to comment on that – some of whom would not have expected a need to become involved based on the current consultation.

7.3.2 Nonetheless, this Local Plan should give a clear indication of the locational priorities to be followed in the site allocation process. The outcome of this Plan should be a broad statement on how much development (in hectares and/or numbers of houses) might reasonably be expected to be accommodated in different areas around Lenham, plus the associated infrastructure which should be provided at the same time. Details could be worked out later in a Local Plan Review or Area Action Plan.

#### **7.9 Should the planning permission for 82 dwellings on the land West of Ham Lane be considered as part of the Broad Location figure of 82 dwellings or as an addition to it?**

7.9.1 The 82 dwellings west of Ham Lane should be considered part of the Broad Location figure. Taking the village as a whole, the diagram on page 169 of the Submission Plan includes the Tanyard Farm and Glebe Gardens proposed allocations. Both these extend the Lenham boundary. However, the West of Ham Lane site has not been included in such an extension of the village to the west, and does not count amongst the proposed allocations. Its 82 dwellings are additional to the allocations and therefore appropriate for the Broad Allocation. The site falls partly within the area covered by one of the Council’s stars on page 169, also suggesting that it might contribute to a future Broad Location. 82 houses would in effect be double counted if added to the 1,500 in the Broad Location.

#### **7.10 Is it realistic to expect the remainder of the H2(3) Lenham Broad allocation for 1,500 dwellings to be delivered within a 5 year period (2026-2031) at an average rate of 300 dwellings each year?**

7.10.1 No. House builders would be most unlikely to be able to sell 300 dwellings per year in a village the size of Lenham. Such a massive rate of building would also be difficult for the village to cope with in any event, both practically in construction terms and socially in terms of absorbing the consequent number of residents into the community (e.g. schools and doctor’s surgeries).

**7.12 What is the status of the ‘inset plan’ on page 169?**

- a) **Is it part of a key diagram and, if so, should it be included or cross referred in the key diagram on page 23?**
- b) **If it is part of the key diagram is it appropriate to use an Ordnance Survey base?**
- c) **In any event should the plan be modified to reflect the Exploration work and the Transport Study?**

7.12.1 The Kent Downs AONB Unit is inviting the Inspector to make substantial changes to the distribution of housing around Lenham compared with the proposals in the Plan. If our views are accepted, then the inset plan on page 169 would be inappropriate and discarded. Whether an OS base can be used depends on the answer to 7.3: only if specific sites are allocated would that be appropriate. If, as we suggest, further work is needed first, a diagrammatic representation would be adequate. We certainly believe that the plan should be modified, taking into account the technical assessments. In the case of the Transport study, the important point is not so much where the housing is sited as the roads which need to be built to enable people in new houses to move around. Traffic can be arranged to focus on the west side of Lenham even if the houses are built principally to the south of the village. Not apparent from any map is that the part of Old Ham Lane immediately south of its junction with Ham Lane is not a public highway but on the private property of the employment site. The Exploration (Broad Location) work will also need to be considered when deciding where development should be located (see Q7.13 below).

**7.13 Has the identification of the Broad Location had sufficient regard to the setting of the AONB and has this been addressed in the subsequent exploration work?**

7.13.1 The Broad Location report has had much more regard for the setting of the AONB than has the submitted Plan – which had none. However a more fundamental assessment of the AONB setting is needed. In all the detailed comments which follow, consideration should be given to the level of screening likely to be achieved during the winter months by appropriate (deciduous) tree planting: this is likely to be a major constraint on housing development in the setting of the AONB, especially at the sites proposed to be allocated.

Proposed land allocations

7.13.2 The starting point for both the Plan and the Broad Location report is that the Tanyard Farm site H1(42) (between the Community Centre and the Ashmills Business Park, and between the A20 and the Old Ashford Road) should be allocated for 155 dwellings (Policy H1(42)). This site is the single most sensitive site around the whole of Lenham in terms of impact on the setting of the AONB. Policy H2(3) refers to the need to submit ‘landscape and visual impact assessments with detailed mitigation schemes where appropriate’, but fails to mention the adjacent nationally protected AONB landscape (as the Inspector notes in paragraph 3). The Council has been particularly insensitive to the AONB to consider this site appropriate. We request its deletion.

7.13.3 The SHEDLAA (which calls this site MX11) in its ‘Sustainability conclusion’ correctly states that “The site in its undeveloped form provides part of the setting of the North Downs, appreciable from a number of public vantage points outlined above. The

relationship to the AONB is particularly apparent because of the open, expansive character of the site and the clear views across the gradually rising ground towards the scarp slope of the AONB.” However the next sentence is “The careful siting and landscaping of development would be required to mitigate impacts on the setting of the AONB.” That is incompatible with the previous statement: a site visit will demonstrate that effective mitigation by landscaping and the use of vernacular materials is not possible. Based on that erroneous assessment, the advantages of the site in terms of proximity to facilities lead the Council to the contentious conclusion that the site is suitable for residential development.

7.13.4 The Sustainability Appraisal of the Tanyard Farm allocation does not reflect the evidence base. The *Maidstone Landscape Character Assessment 2012* (amended 19 July 2013) – the one in the evidence base supporting the Plan – clearly states that the ‘Condition’ of the area (East Lenham Vale) is ‘Good’. Along with ‘very high sensitivity’ the overall guideline is to ‘Conserve’ the character area (definitions on page 2 of the LCA). The ‘Summary of Actions’ in the LCA for East Lenham Vale includes “Conserve the undeveloped foreground and rural setting of the Kent Downs AONB”.

7.13.5 However, the Sustainability Appraisal incorrectly quotes the LCA, stating that the Condition of the area is ‘moderate’. It then goes on to state the Council’s view that the site is capable of being ‘appropriately mitigated’. As a result, this gives the site an ‘amber’ traffic light rating on this count. However, as the site is clearly ‘unlikely to be capable of being appropriately mitigated’, it should have been given a ‘red’ traffic light rating. The Sustainability Appraisal draws no conclusions and makes no recommendations on each allocation site individually. There is a summary of reasoning in the SA main report, with paragraph 12.10.3 merely stating of the sites proposed to be allocated “These sites are located adjacent to the existing settlement boundary and as such, has good access to the services and facilities available in Lenham.” This does not address any of the environmental issues applicable to the site and neglects the proximity of the AONB (across the road) and the development’s impact upon it. Overall it says nothing more than the Council’s own planning process said, and likewise ignores the AONB.

7.13.6 Furthermore, the Sustainability Appraisal is flawed because it does not refer to the *Maidstone Landscape Capacity Study: Sensitivity Assessment*, January 2015 commissioned by the Borough Council from Jacobs (as was the LCA). This assessment reinforces the inappropriateness of development at Tanyard Farm. Jacobs describe the Landscape Character Sensitivity of East Lenham Vale as ‘High’ and its Visual Sensitivity as ‘High’, resulting in the highest possible overall rating in the sensitivity matrix. The assessment concludes of the area East of Lenham “The area is **sensitive to change**. Development should be limited to infill within village boundaries” (page 18). The subsequent Guidelines include:

- Consider the impact of development on views from and the setting of the Kent Downs AONB;
- Conserve the undeveloped foreground and rural setting of the Kent Downs AONB;
- Conserve the crisp boundary between Lenham’s compact settlement and the surrounding rural area.”

We find no evidence in the Plan of the application of any of these guidelines to the Tanyard Farm site.

7.13.7 We do not consider that the permission granted on appeal for 82 dwellings West of Ham Lane has any important implications for Tanyard Farm. The highly intrusive Westwood Close had already been allowed by the Council and built behind the appeal site when seen from the Downs: the new appeal site development is conditioned to be lower than that scheme. There is no equivalent intrusion east of Lenham. The Landscape Character Assessment of the site, in the Harrietsham to Lenham Vale area, has a slightly lower rating ('moderate' rather than 'good' Condition) than the area covering Tanyard Farm, so even more care is needed at the latter. The appeal Inspector commented "I note the evidence submitted that the retained site [Tanyard Farm] appears to have a more sensitive relationship to the AONB" (paragraph 61).

7.13.8 The Tanyard Farm site was rejected by the Inspector who held the Inquiry into the Borough Wide Local Plan adopted in 2000, for reasons comparable with our own. So far as AONB issues are concerned, the Inspector concluded: "On my visits to the area I found when approaching the site from the east along the A20 and the Old Ashford Road, that the whole field shares the rural character and appearance of the farmland to the north which rises up to the North Downs. In this context I have no doubt that the field is an important part of Lenham's countryside setting..... looking westwards along the A20 the objection site can be seen through the trees on its western boundary to be very clearly part of Lenham's setting" (paragraph 4.466). "The site is within the North Downs SLA and the larger field of which it is part is prominent when seen from the North Downs Way. The objection site itself is partly screened by a very gappy hedge, but houses on it would be seen from the SLA to extend Lenham into its countryside setting. For all these reasons, I have no doubt that houses on the site would be an intrusive urban feature in the rural area around Lenham, and I conclude that they would materially harm the character and appearance of the area." (paragraph 4.467). The full terms of the Inspector's Report is provided in Appendix 5.

7.13.9 The Kent Downs AONB Unit has opposed the allocation of this site at every opportunity, but these representations have been persistently overridden by Maidstone BC. The Unit is of course not opposed to development in principle but only where damage incapable of satisfactory mitigation would be caused to the AONB. The problem here is that at no point has Maidstone BC taken into account the impact of development on the AONB when drafting its Plan for Lenham. This is evidenced not only by the Tanyard Farm allocation but by the 'stars' indicating the suitability of sites both west and east of Lenham for very large-scale housing development.

7.13.10 The other allocation H1(43), of 10 houses as an extension to Glebe Gardens, is not opposed in principle by the Unit. However, this is a sensitive location close to the AONB, so the development should be carefully conditioned and managed to protect AONB interests. We ask the Inspector to add suitable controls. Our proposals to enhance Policy H1(43) made at the Regulation 19 consultation stage are repeated in Appendix 1 below for convenience. We request that the allocation in Policy SP8(1) is reduced from 165 dwellings to 10 dwellings.

Accommodating major growth at Lenham consistent with AONB policies

*Overall*

7.13.11 Paragraph 5.52 of the Submitted Plan opens as follows: “It is recognised that the location of Lenham within the setting of the Kent Downs Area of Outstanding Natural Beauty makes this an area sensitive to change. The benefits of selecting this most sustainable of all the rural service centres is considered on balance to outweigh the potential negative impacts on the landscape.” The national legal and policy requirement is not as simple as this balancing exercise. Section 85 of the Countryside and Rights of Way Act 2000 requires authorities to have regard to the purpose of conserving or enhancing the natural beauty of the AONB “in exercising or performing any functions in relation to, or so as to affect”, land in an AONB. Planning practice is reminded of this in the PPG note on the Natural Environment (ID 8-003-20140306) and specifically mentions proposals “which might have an impact on the setting of” an AONB. The NPPF requires that in any decision “great weight should be given to conserving landscape and scenic beauty” in AONBs. If the impact of a development in the setting of the AONB would affect the purposes of that AONB (as it would in this case), then ‘great weight’ would need to be given also to AONB interests when assessing development in the setting. Finally, plan preparation (and development management) should have regard to AONB Management Plans (PPG ID 8-004-20140306). These are statutory documents which cannot be ignored: the AONB Unit has repeatedly drawn the Council’s attention to the relevant Kent Downs AONB Management Plan policies. The Borough Council’s simple balancing exercise is inadequate in this context.

7.13.12 The inadequacies in paragraph 5.52 are all the more startling in the context of paragraphs 5.77-81 of the Plan, which properly spell out the measures which the Council proposes to take to protect the AONB and its setting. In particular this states: “Open countryside to the immediate south of the AONB forms a large extent of the setting for this designation. In Maidstone this is a sensitive landscape that is coming under threat from inappropriate development and is viewed as a resource that requires conservation and enhancement where this supports the purposes of the AONB.” It also states “The Kent Downs AONB Management Plan advises that ‘where the qualities of the AONB which were instrumental in reasons for its designation are affected, then the impacts should be given considerable weight in decisions. This particularly applies to views to and from the scarp of the North Downs.’”

7.13.13 The Plan is therefore not in a position simply to override AONB policy for local purposes in the way described in paragraph 5.52. Development at Lenham must respect the setting of the AONB, especially as this is at the foot of the AONB scarp. We set out below how we propose that should be done. At present, we consider that the proposals for Lenham are in breach of Policy SP17(5) which states “The distinctive character of the Kent Downs Area of Outstanding Natural Beauty and its setting.... will be rigorously conserved, maintained and enhanced where appropriate”.

### *West of Lenham*

7.13.14 West of Lenham the grant of permission on appeal for development west of Ham Lane (ref. 3131945) will extend Lenham westwards along the south side of the A20 to a point at least half way between Ham Lane and Dickley Wood. This will be on the north side of the intrusive development recently constructed at Westwood Close. These developments would largely screen any further low-rise housing development to their south when viewed from the AONB. Housing development could therefore be carried out on a line running SSW from the western edge of the 'West of Ham Lane' site, roughly parallel with Ham Lane, as far as the railway line.

7.13.15 Land to the west of the 'West of Ham Lane' development should remain open. The photograph in Appendix 2 shows the land between Ham Lane and Dickley Wood from the North Downs Way (east of the north-south Pilgrim's Way, which runs down to form a crossroads with Ham Lane). The photograph shows that more land is exposed to view on the western side of this gap than on the eastern (Ham Lane) side. Housing on the western side would have a greater impact than on the eastern side, and this would apply all the way to the railway line. So far as the assessment in *Exploration of the Broad Location Allocation* is concerned, the Kent Downs AONB Unit therefore considers that the 'Lenham Village Possible Option' shown on page 23 would be acceptable from the perspective of the AONB setting. However, the 'Lenham Village Broad Location Allocation' proposal on page 19, which includes an additional lobe of housing development south of Dickley Wood, would not be acceptable.

### *East of Lenham*

7.13.16 Land to the east of Lenham between the A20 and the railway line is all in the setting of the AONB. Almost all of this land is intervisible with the North Downs, apart from very small areas shielded by existing screening to its immediate north. Isolated lines of housing could be tucked-in to the south of Glebe Gardens, south of Ashmills Business Park and south of the copse to the south-west of East Lenham hamlet. None of these small linear sites would make development sense, and none of them could contribute significant numbers of dwellings to the major growth objective for Lenham. The contribution of this open land to the character of the AONB setting is apparent from both directions. Appendix 3 shows four views on the east side of Lenham:

- (a) Towards the Downs from the underpass under the railway at Grid Ref 907512;
- (b) Over the whole area from the North Downs Way directly north of the western end of Ashmills Business Park;
- (c) Towards the rising land enclosed by Lenham on its west and north sides (from an adjacent position to (b)); and
- (d) Towards Ashmills Business Park, showing the very limited scope for house building behind the site without damaging the setting of the AONB (from an adjacent position to (b)).

7.13.17 East of Grove Way (including the Tanyard Farm proposed allocation) the land to the south is nearly flat (sloping gently southwards), but immediately east of Lenham on its south side the land rises and is especially prominent in views from the Downs (right hand edge of photo in Appendix 3(b)). The latter is shown more prominently in its context in Appendix

3(c). Building houses on any of this land would give the impression of Lenham sprawling out eastwards into the semi-natural agricultural setting of the AONB. Housing development in the area closest to Lenham (the land rising southwards on the village's south-east side) would be particularly intrusive from the North Downs. If development were to begin further to the east, leaving that land in agriculture, that land would soon be surrounded and come under great pressure for development in future. In any event, the land further east is itself sensitive in AONB terms and should in our view not be developed.

7.13.18 So far as the *Exploration of the Broad Location Allocation* is concerned, the Kent Downs AONB Unit considers that:

(i) The distribution of housing proposed east of Lenham on page 19 'Lenham Village Broad Location Allocation' would be unacceptably damaging to the setting of the AONB, though we recognise that the importance of not building on the fields immediately east of the existing residential area has been acknowledged. We strongly object to the Sustainability Appraisal's commentary on the proposed release of site HO3-264, covering much of this area, that "It is possible to see parts of this site from the Downs but it must be noted that any development here would have the emerging local plan allocation (H1-29 – large field to the east of the village hall) in the foreground." It is clearly wrong to excuse this damaging development on the basis of equally damaging development allowed in front of it.

(ii) The reduced scale of building south of the Tanyard Farm proposed allocation on page 23 'Lenham Possible Village Option' would also be unacceptably damaging to the setting of the AONB. Although lesser in scale it would appear as a sprawling irregular dumbbell in open countryside without any relationship to Lenham village. The 'structural landscaping' proposed would not provide mitigation: the amount required would transform the character of the area, and in any event would only be effective decades into the future.

(iii) Housing in the lee of the industrial estate could accommodate a narrow line of housing without significant impact on the setting of the AONB. This is due to the height of the larger units there. However, development extending southwards would quickly come into view from the Downs. We consider that the scale of housing proposed on page 23, taking development almost to East Lenham hamlet, would mostly be in view from the AONB and would be far too large to preserve the AONB's setting. The impact of such development is readily appreciable from Appendix 3(d).

#### *South of Lenham*

7.13.19 The *Exploration of the Broad Location Allocation* also proposed on page 23 that development around Lenham should be allocated south of the railway line. We agree, but consider the opportunities go further in terms of avoiding harm to the setting of the AONB:

(i) The land between Old Ham Lane and Headcorn Road is well screened by existing development and tree cover. Some of the land is just visible from the Downs to the north-west, but this is not significant to the setting of the AONB in the context of the existing village (see Appendix 4(a)). Most of the land between the railway and the Headcorn Road to Old Ham Lane footpath could be released, even though this is relatively high ground.

Consideration should also be given to extending the development westwards onto the west side of Old Ham Lane behind Lenham Court (see Appendix 4(b)). This would be south of the development west of Lenham and would not significantly affect the AONB's setting.

(ii) We agree that there is scope for substantial housing development between Headcorn Road and the railway foot-crossing further east (see Appendix 4(c)). This is screened from the Downs by trees on either side of the railway line, which form the backdrop to the green fields prominent in Appendix 3(c) when seen from the Downs. However, this would benefit from being thickened by new planting to be more effective in winter. We agree that housing should leave a buffer zone with Oxley Wood to its south.

(iii) The railway foot-crossing was chosen for this point because the railway is at grade. To the west the railway runs progressively into cutting, and to the east it runs out on a high embankment. Appendix 4(d) indicates the height of the railway above surrounding land. That embankment is sufficient to hide carefully-designed housing for a distance of about one third of a mile alongside the railway, though the land rises progressively to the south. Housing should not be continuous from Headcorn Road to this section due to a prominent area of land easily visible from the Downs running a few hundred yards east from Oxley Wood (see Appendix 4(e)), though a road could run through this area to link to the development area available further east.

**7.15 What is the view of Representors such as the Neighbourhood Plan Group, the Kent Downs AONB Unit and the Lenham Parish Council about the recent exploratory work for the Broad Location?**

7.15.1 Our comments on this are covered in response to Q7.13 above.

**7.18 Do the conclusions of the Inquiry for land west of Ham Lane have any implications for the H1(42) allocation in relation to the setting of the AONB?**

7.18.1 Our response is included above at paragraph 7.13.7.

**Appendix 1: Policy H1(43) Glebe Gardens, Lenham**

The site lies in the setting of the Kent Downs AONB. Lighting in this sensitive location at the foot of the downs would be intrusive and impact on the dark night skies of the area. Dark night skies are an element of tranquillity identified in the Kent Downs Management Plan (policy SD7) and is supported by the NPPF (paras 123 and 125) which requires planning policies to limit the impact of light pollution on dark landscapes. An additional criterion is required that restricts street lighting and other external lighting to help conserve dark night skies.

The proximity of the site to the AONB boundary and existing network of rights of way would, given the increase in population should the site be developed, result in increased and more intensive use of the AONB which would need to be accommodated by landowners managing the AONB. Improvement of surfaces, hedging, fencing, boundaries, stiles and gates will be need in future to secure the landscape whilst ensuring legal, safe and enjoyable public access and ensuring the conservation and enhancement of the AONB in accordance with the CROW Act and the Kent Downs AONB Management Plan. This should be secured through an additional criterion requiring developer contributions towards the maintenance of boundaries and PRoW in the KDAONB. A criterion securing pedestrian access through the site to provide connectivity between existing Public Right of Ways on the south and north of the site would also be beneficial.

**“6. A PEDESTRIAN ROUTE SHALL BE PROVIDED THROUGH THE SITE TO ALLOW CONNECTIVITY BETWEEN FOOTPATH KH399 TO THE SOUTH OF THE SITE AND THE PUBLIC FOOTPATH TO THE NORTH OF THE SITE.**

**LIGHTING**

**7. THE DEVELOPMENT WILL NOT INCLUDE ANY STREET OR OTHER EXTERNAL LIGHTING TO MAINTAIN DARK NIGHT SKIES IN THE RURAL LANDSCAPE AND PROTECT THE SETTING OF THE KENT DOWNS AONB**

**OPEN SPACE/NATURAL ENVIRONMENT**

**8. CONTRIBUTIONS ARE MADE TOWARDS THE UPKEEP OF PUBLIC RIGHTS OF WAY AND THE MAINTENANCE OF BOUNDARIES IN THE ADJACENT AONB.”**

**Appendix 2: West of Lenham from the North Downs Way**



**Appendix 3: East of Lenham**  
**(a) North from the railway underpass**



**(b) South from the North Downs Way**



**(c) South-West from the North Downs Way**



**(d) South South-East from the North Downs Way**



**Appendix 4: South of the Railway**

**(a) Between Old Ham Lane and Headcorn Road:  
north-west from the footpath (approx. midpoint)**



**(b) West of Old Ham Lane behind Lenham  
Court: north-west from bridleway**



**(c) East of Headcorn Road: east south-east towards railway foot-crossing**



**(d) Railway underpass at Grid Ref. 903514: north to North Downs**





**Appendix 5: Maidstone Borough Wide Local Plan 2000 – Report of the Inspector**

Extract on an objector's proposed allocation of land at Tanyard Farm, Lenham, chapter 4, page 238:

**"H2 - Housing Land Allocations: Land at Rear of Old Ashford Road, Lenham**

**Objection** DH0058 - Tanyard Properties

- Issues**
- (a) Whether in principle Lenham is a location for new housing which would accord with the aims of sustainable development and of reducing the need to travel set out in PPG13.
  - (b) Whether housing on this site would harm the character and appearance of the area; and if so
  - (c) whether the need to meet the Structure Plan housing requirements or other benefits claimed for the development override any harm which might be identified.

**Conclusions**

4.464 Dealing with issue (a) my recommendation in paragraph 4.72 recognises that sites in small rural towns could meet sustainability objectives, and in principle it seems to me that Lenham is such a town. It has a range of everyday community and shopping opportunities and, as the objectors argue, it also has extensive local job opportunities. It could, therefore, be a rural centre as defined in paragraph 1.8 of PPG13 to be strengthened to meet the aim of reducing the need to travel. In addition it has a railway station with services to Maidstone and beyond, and therefore accords with advice in paragraph 3.2 of the PPG about the location of new housing when needs cannot be met in central locations in larger urban areas.

4.465 In principle, therefore, I conclude that Lenham could be identified in the Plan as a small rural town subject to H28 and RS3(a) of the Structure Plan, and this is agreed by the Council. I have dealt with the Council's general argument about the need for time to allow villages to absorb the population arising from new housing paragraph 4.71, and for those reasons this does not alter my conclusion.

4.466 Turning to issue (b), the objection site is on the eastern side of Lenham and is part of a large farmed field. On my visits to the area I found when approaching the site from the east along the A20 and the Old Ashford Road, that the whole field shares the rural character and appearance of the farmland to the north which rises up to the North Downs. In this context I have no doubt that the field is an important part of Lenham's countryside setting. From closer to on the A20, the houses to the south of the objection site, and Grovelands to the west, are more apparent particularly in winter. However, I did not find that their impact was enough to distinguish the objection site from the rest of the field of which it is part. Similarly, looking westwards along the A20 the objection site can be seen through the trees on its western boundary to be very clearly part of Lenham's setting.

4.467 The site is within the North Downs SLA and the larger field of which it is part is prominent when seen from the North Downs Way. The objection site itself is partly screened by a very gappy hedge, but houses on it would be seen from the SLA to extend Lenham into its countryside setting. For all these reasons, I have no doubt that houses on the site would be an intrusive urban feature in the rural area around Lenham, and I conclude that they would materially harm the character and appearance of the area.

4.468 Finally on issue (c), I found in paragraph 4.238 that an additional 940 units were needed to meet the Structure Plan housing requirement. Moreover, I accept in paragraph 4.700 that I have been unable to recommend enough sites to meet that need. However, I have no doubt that this need does not outweigh the serious harm which I have found in dealing with issue (b), and I conclude that housing is not justified on this site.

4.469 This objection also seeks the inclusion of *Northland*, a house on the objection site, within the Village Boundary of Lenham. However, as an agricultural dwelling granted permission as an exception to countryside restraint policies, it seems to me that the future of this house should be dealt with as a matter of development control, against the Development Plan policies and Government advice which prevail at the time.

#### **RECOMMENDATION**

4.470 Do not modify the Plan in response to this objection.”