

Strategic Planning
Maidstone Borough Council

Date: xxx

Maidstone Borough Council

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By email only

Dear Sir/Madam

LENHAM NEIGHBOURHOOD PLAN 2017-2031

Consultation pursuant to Regulation 16 of The Neighbourhood Planning (General) Regulations 2012 (as amended)

Consultation period 14 February to 27 March 2020

Lenham parish was designated a neighbourhood area on 27 November 2012. The parish council undertook public consultation on the pre-submission version of the Lenham Neighbourhood Plan (Regulation 14) between 24 September 2018 and 9 November 2018. The Borough Council submitted representations on the plan and, in response to all representations received, the parish council amended the neighbourhood plan as it felt appropriate.

The Borough Council is satisfied that public consultation on the pre-submission draft neighbourhood plan was carried out in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended), and the submission of the neighbourhood plan and supporting documents meet the requirements of Regulation 15.

Public consultation on the Lenham Neighbourhood Plan (Regulation 16), facilitated by Maidstone Borough Council, commenced on 14 February 2020 and closes on 27 March 2020.

This letter forms Maidstone Borough Council's representation on the Lenham Neighbourhood Plan (Regulation 16 version).

The Maidstone Borough Local Plan 2017 designates Lenham as a broad location for housing growth, to deliver 1,000 homes between 2021 and 2031. Specific site allocations could be made through a local plan review or the production of a Lenham Neighbourhood Plan. The parish council decided to prepare a neighbourhood plan and to allocate the housing sites to deliver 1,000 dwellings. During the preparation of the plan, the Council has offered advice and support to the parish council on matters such as the neighbourhood planning process, the evidence base, the plan's regard to national policy, and general conformity with the strategic policies of the Maidstone Development Plan. The Council has also assisted with funding, securing a £75,000 HCA grant for transport planning, and exploring the availability

of a government-funded package to assist with the preparation of the Strategic Environmental Assessment. Contact with the parish council has been maintained throughout the plan's preparation. The parish council has afforded the Council opportunities to informally comment on draft iterations of the plan and/or policies, and the parish council has responded positively to the advice given.

This is the first opportunity that the Council has had to view the final Lenham Neighbourhood Plan and the full suite of evidence, to enable a formal position on the plan to be taken. The Lenham Neighbourhood Plan was given consideration by the Council's Strategic Planning and Infrastructure Committee on 10 March 2020.

There is general support for the plan, subject to the resolution of matters raised in this representation. However, the Council has particular concerns about the robustness of the evidence base and the lack of a strategy to deliver 1,000 homes with supporting infrastructure between 2021 and 2031 (i.e. 100 dwellings p.a. over 10 years), in accordance with the strategic policies of the Maidstone Borough Local Plan, namely:

- Policy SP8 – Lenham Rural Service Centre, in particular criteria 4 and 6;
- Policy H2 – Broad locations for housing growth; and
- Policy H2(3) – Lenham broad location for housing growth.

As an overview, a key omission from the neighbourhood plan is a delivery strategy for the southern road route. This route requires engagement with the landowners of non-allocated sites (two appeal sites to the north of Sites 4 and 5), where the landowners have no direct benefit from the wider neighbourhood plan allocations and thus limited motivation to engage. It also requires improvements to inadequate infrastructure. The plan contains no strategy in relation to, say, land acquisition or funding. This could be addressed, for example, by some form of Memorandum of Understanding or equalisation agreement between landowners.

Site 3 is severed from the main village by the railway which is a substantial barrier. It is in effect landlocked, placing a burden on others to deliver infrastructure. The site is only accessible from the west, with the western Smokey Bridge route sub-standard due to the constraints of the bridge. Its location and detachment do not promote sustainable patterns of travel, and it is reliant on the landowners of other sites for delivery. Hence a delivery strategy is needed.

It is understood that the owners of Site 4 have announced that the appeal scheme (to the north of site 4) will not be amended to widen the access road, so site 4 needs to allow for an access road capable of delivering the bus route should it be required.

Land outside of the ownership of Site 5 is required for the new road connection to the A20. The landowner of the appeal site to the north of Site 5 could refuse a land deal to facilitate the A20 junction improvements necessary for the new road, resulting in a failure of the plan's Strategic Housing Delivery Sites strategy. Evidence of agreement with the landowner is needed to demonstrate deliverability of the road, and hence the residential allocations within the plan period. Otherwise, there is a material risk that the plan could fail to deliver the required 1,000 units.

The sports pitches at William Pitt Field (Site 6) are proposed to be relocated to Site 1, to enable Site 6 to be redeveloped for housing. There is a lack of justification for their relocation, particularly given their proximity to housing sites 5 and 7. The relocation site for the pitches is bisected by PROW KH399A, and its diversion has not yet been secured. This could take up to 3 years under the Highways Act 1980, and is not guaranteed to be granted. Sport England has not confirmed whether the indicative layout of the relocated pitches at Site 1 would be viewed as an adequate replacement of the William Pitt Field pitches lost on Site 6.

The Council raises objection to the designation of Royton Avenue as Local Green Space (LGS) under Policy LGS1(6). The site does not meet NPPF criteria for the designation of LGS (NPPF paragraph 100), and its designation would set a precedence for similar sites elsewhere in the borough. In its Consultation Statement (page 31), the parish council rejects a proposal to designate this site as LGS. The Borough Council is not aware that consultation with the landowner has been undertaken.

Policy DM19 of the Maidstone Borough Local Plan sets standards for the provision of publicly accessible open space throughout the borough. Although this is not a strategic policy, the neighbourhood plan should demonstrate how it has had regard to Policy DM19 and how the public open space levels across all of the Strategic Housing Delivery Sites have been determined.

The additional amendments below are intended to achieve conformity with national and local policies, greater clarity and consistency throughout the plan.

Page no.	Paragraph/ Policy no.	Representations Proposed additional text emboldened , and deleted text struck through
2	Paragraph 1.2.1	Correction: 'Following this introduction that the Plan ... '
3-4	Paragraphs 1.5.4 to 1.6.2	Delete paragraph 1.5.4, and amend or delete paragraphs 1.6.1 to 1.6.2 Reason: These paragraphs refer to procedural matters (as opposed to land use policy) that are specific to the Lenham Neighbourhood Plan. The stages highlighted would not necessarily apply to other neighbourhood plans, for example, reference to consultation on a pre-Regulation 14 plan. The paragraphs also give an impression that once an examination is held, there are no barriers to the plan proceeding to local referendum.
5	Paragraph 2.1.1	Correction: ' ... as shown on Drawing 1 the Lenham Neighbourhood Plan Parish Boundary Map on page 46. '
7	Paragraph 2.2.6, criteria 4 and 6	For clarity: 4) ' ... if the scale of development justifies on-site provision ... ' 6) ' ... respond positively to the wider area of to create enhanced linkages and networks'
8	Paragraph 3.1.8	Delete ' ... which accompanies this Regulation 16 Submission Plan ' Reason: This text is superfluous for a final plan.

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9	Paragraph 4.1.5	Delete table. Reason: The principle of seeking quality design is welcomed and is a central element of the Maidstone Borough Local Plan. The table setting out a formula for securing multiple typologies is considered to be unnecessary, and there is a lack of evidence to support the variables. The supporting text at paragraphs 4.1.6 and 4.1.7 is considered to be adequate.
10/11	Policy D1	Observation: The broad principles set out in Policy D1 are generally sound and expand upon the principles established within Policy DM1 of the Maidstone Borough Local Plan, although there is a degree of repetition with Local Plan Policy DM1.
10	Policy D1(2)	Amendment: 'Design that incorporates opportunities to enhance and provide for net gains for biodiversity are encouraged.' Reason: Conformity with NPPF.
10	Policy D1(3)	Delete final sentence which is a repeat of criterion 4.
10	Policy D1(4)	Delete criterion 4, and replace with: ' Development within mixed-use areas, including Lenham village centre, should seek to contribute to the vitality of the area and the role of public realm and where appropriate: <ul style="list-style-type: none"> • Provide active uses and shop window frontages at street level (dead frontages within the village centre should be avoided); • Where areas of private realm are to be created, for example outdoor seating areas, these should be designed to complement and not detract from any adjacent public realm; • Elements such as vehicular parking, private storage fronting existing public realm areas should be avoided.' Reason: There may be instances where pursuing active frontages is not appropriate and so the policy should be more flexible. The requirement to differentiate between public and private realm should be clarified, for example, the reference to outdoor seating areas.
10	Policy D1(6)	Amendment: 'New development on allocated sites should be designed such that it does not prejudice future development or design of adjoining allocated sites ' Reason: It would be unreasonable and undesirable to apply this criterion to all future development sites.
10	Policy D1(7)	Correction: ' ... of the North Kent Downs Area of Outstanding Natural Beauty ...' Delete criterion 7 and replace with: ' The location and design of new development shall have regard to the role Lenham plays within

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		<p>the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB). Development should not detract from the landscape quality or special characteristics of the AONB. Major developments, or other schemes capable of detracting from the AONB should be accompanied by an appropriate LVA/LVIA and where appropriate, a landscape mitigation strategy.'</p> <p>Reason: Relationship to the AONB in the policy refers only to foreground, but the setting is a wider relationship with views to and from the AONB. This section of the neighbourhood plan could also cross reference the AONB Management Plan.</p>
11	Policy D1(8)	<p>Amendment: 'The size of buildings should be such that the buildings are almost well screened by trees and other vegetation when viewed from the AONB and its setting, including taking account of the prominent scarp face and the setting of the AONB'.</p> <p>Reason: "Almost screened by trees" could lead to buildings being of a size that is greater than the proposed tree screening.</p>
11	Policy D1(11)	<p>Observation: It is unclear what is meant by 'of the place'.</p>
11	Policy D1(12), criterion 2	<p>Observation: It is not necessary to specify 'low' front boundaries.</p>
11	Policy D1(12), criterion 3	<p>Correction: '... dominated by car parks parking'.</p>
11	Policy D1(12), criterion 8	<p>Amendment: 'Native trees of local provenance shall be planted alongside roads and in areas which are kept as communal areas, unless other species are characteristically appropriate, in order to achieve maximum screening optimum integration of the development into the landscape when viewed from the AONB;'</p> <p>Reason: The planting in communal areas may incorporate non-native tree species which are appropriate to Kent, such as orchard trees. Screening of a development may only serve to draw attention to it unless it is characteristically appropriate.</p>
11/12	Policy D2	<p>Observation: It is not ideal to combine small housing schemes and extensions in the same policy. Other than Policy D2(1), the rest of the policy does not refer to any principles that cannot or could not be covered under Policy D1.</p>
11	Policy D2(1)	<p>For clarity: '...of Lenham are welcomed supported'.</p>
12	Policy D2(2), criterion 3	<p>Amendment: '...does not result in the net loss of local amenity green space ...'</p> <p>Reason: To conform to NPPF (paragraph 97) and to reflect Policy DM19(7) of the Maidstone Borough Local Plan.</p>
12	Policy D2(4)	<p>For clarity: Refer to the unit threshold rather than simply cross referencing the NPPF.</p>

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13	Policy D3	Observation: The objectives of this policy would be better served through the application of an updated Policy D1. 'Bespoke' has no real planning meaning. Design competitions are a matter of choice for an applicant.
13	Policy D4	Amendment: 'Where land is proposed for self or custom house building a site masterplan and design codes individual plot passports should be prepared and submitted as part of a any planning application submitted to Maidstone Borough Council for approval. Together, these will regulate the inform each plot design and ensure that a cohesive and high quality form of development is secured of development. The masterplan should address site layout, open space, vehicular and pedestrian access, whilst codes should address establishing building parameters such as heights, footprints, set-backs, densities, and parking requirements, and materials. Where relevant an application should include strategies for governing the future management of open areas and landscaping.' Reason: As a planning policy, this should refer to design codes rather than plot passports.
13	Policy D5	Amendment: ' ... Proposals for rear or separate parking courts will not be supported. Where proposals incorporate separate parking courts, these should be of a high quality and form an integral element of the overall open space strategy in terms of materials and landscaping. Any such areas should be designed to be visually supervised by the dwellings they serve.' Reason: It is not appropriate to oppose all parking courts. Whilst often poorly planned, there are examples of good design such as Poundbury.
14	Paragraph 5.1.8	Correction: Reference to Section 13 should be Section 12.
14	Policy AT1(1)	Amendment: ' ... they must be direct attractive , safe ...' Reason: 'Direct' footpaths may not always be the best solution.
15	Policy AT2	Delete Policy AT2 and replace with: ' New development will be supported where it can demonstrate that it is able to promote sustainable patterns of travel, optimising the ability to link into or access existing or proposed public transport routes.' Reason: This is a bus policy, rather than for public transport as a whole, and criterion 1 is not relevant for a planning policy document.
15	Paragraph 5.3	Amendment: 'Active Travel Projects funded by Community Infrastructure Levy Developer Contributions and Government grants' Reason: The proposed change is less restrictive and would future-proof the plan by using more generic terminology.

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15	Policy AT4(2)	Delete criterion 2 and replace with: ' Proposals should demonstrate that they are capable of connecting into and where appropriate extending the existing public footpath network. Where a development does not connect directly to the existing network, applicants should demonstrate how improved connections can be achieved. ' Reason: The onus should be on the applicant to show how improved connections can be achieved.
16	Paragraph 6.1.2	Observation: Rather than "space left over after planning", such space can be landscaping as part of development design.
16	Paragraph 6.1.5	Amendment: ' ... be expected to comply with have regard to the standards...' Reason: Policy DM19 of the Maidstone Borough Local Plan is by its nature one that is applied flexibly, for example, subject to a site's location and character.
16	Policy GS1(5)	Amendment: ' ... and sustainable urban drainage' Reason: SuDS are sustainable drainage systems, so there is no need to include 'urban', particularly in the context of Lenham.
16	Policy GS1(6)	Observation: Bearing in mind the need for ancillary facilities, splitting the need for sports facilities for Lenham over 3 sites may not be efficient. The replacement of the William Pitt playing fields on site 1 necessitates a diversion of the PROW (KH399A), which has not yet been secured. This could take up to 3 years under the Highways Act, and is not guaranteed to be granted. Amendment: "... MBLP Policy DM19 or successor policy , which makes ...' Reason: To future-proof the policy.
16	Paragraph 6.1.5	Amendment: ' ... Policy DM19 or successor policy. ' Reason: To future-proof the policy.
16	Paragraph 6.1.6	Observation: The reference to "substantial additional area" of outdoor space at Site 1 could be explained more.
17	Paragraph 6.4.1	Amendment: Delete text of paragraph 6.4.1 and replace with " The allotments sit behind the frontages to Ham Lane, Honeywood Road and Robins Avenue. The allotments are well used and form an important recreational facility which is clearly visible from the many houses which front the surrounding roads. The importance of the allotments to village life is emphasised by the proliferation of crops and flowers grown by enthusiastic Lenham gardeners. "

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		Reason: Paragraph 6.4.1 is an incorrect description of the allotments site. The correct description is set out in the pre-consultation draft of the plan (Regulation 14 version).
18	Paragraph 6.5.2	Amendment: ' ...open land falls within the village confines lies adjacent to the village boundary and is surrounded ...' Reason: The site lies outside (but adjacent to) the village boundary, as shown on both the Policies Map of the Maidstone Borough Local Plan and the Lenham Local Policies Map (ref LNP2 submission version).
18	Paragraph 6.5.4, criterion 3	Amendment: ' ... country walk within adjacent to the village;' Reason: The site lies outside (but adjacent to) the village boundary, as shown on both the Policies Map of the Maidstone Borough Local Plan and the Lenham Local Policies Map (ref LNP2 submission version).
18	Paragraph 6.5.5	Amendment: ' ... land is relatively contained within adjacent to the built form ..." Reason: The site lies outside (but adjacent to) the village boundary, as shown on both the Policies Map of the Maidstone Borough Local Plan and the Lenham Local Policies Map (ref LNP2 submission version).
19	Paragraph 6.7.4	For clarity: 'The Meadow is adjacent to the village boundary and is closely ...'
20	Paragraphs 6.8.1 to 6.8.4; and Policy LGS1(6); and Lenham Local Policies Map	Delete the designation of Land at Royton Avenue as Local Green Space (LGS). Delete paragraphs 6.8.1 to 6.8.4 and Policy LGS1(6). Delete the designation from the Lenham Local Policies Map. Reason: The site does not meet NPPF criteria for the designation of LGS (NPPF para 100). For example, the use of the site as a buffer/green lung is not a justification for LGS, nor is its function as part of wider views. A 30-signature petition, out of a population of 3,370 (2011 census), is not considered to be sufficient evidence to justify the site as being of 'local significance' to the community. The site is not unique and its designation would set a precedence for similar sites elsewhere in the borough. In its Consultation Statement (page 31), the parish council rejects a proposal to include this site as LGS. The Borough Council is not aware that consultation with the landowner has been undertaken.
20	Policy LGS1 (after criterion 6)	Amendment: 'Areas defined as Local Green Space will be given long term protection and priority will be given to preserving their character, function and openness over other planning considerations . Developments within close proximity of designated Local Green Spaces should demonstrate that they will not adversely impact upon their accessibility, function or character.' Reason: The text refers to the preservation of openness over other considerations, but most of these spaces are significant as much for their function rather than their openness.

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20	Policy CP1	<p>Observation: This policy is superfluous because it reiterates the policies of the Maidstone Borough Local Plan.</p> <p>Amendment: `...in terms of the potential visual impact of the development upon the visual setting and landscape features character effects on of the site and its surrounds...`</p> <p>Reason: There is no standard methodology for determining the extent of `visual setting`. Landscape `features` is too restrictive and relates only to specific prominent elements within the landscape, e.g. trees, church steeples, etc.</p>
22	Paragraph 7.2.4 and Policy EMP1 and Lenham Local Policies Map	<p>Amendment: `... and this plan identifies the need for a scheme of environmental improvements at the Square ...`. The extent of Lenham Square is not clear on the Lenham Local Policies Map, and an inset map for the village is suggested.</p> <p>Reason: Policy EMP1(2) confirms that a scheme for environmental enhancement and improved traffic management has not yet been identified.</p>
22	Policy EMP1(1)	<p>For clarity: `Development proposals which reinforce the pre-eminence preserve or enhance the character and function of Lenham Square as the retail, commercial, employment and entertainment hub of the Parish will be supported.</p>
22-23; 35	Lenham Station text and Policy EMP2; and SHD Site 3, criterion 12;	<p>Observation: It is understood that the station hub shown on the Lenham Local Policies Map is in two ownerships. Land to the north of the railway lines is owned by Network Rail, and to the south by the landowners of Site 3. This should be made clear in the supporting text for Policy EMP2, and Policy SHD Site 3, criterion 12.</p>
22	Paragraph 7.3.2	<p>Correction: `... circular bus routed route using ...`</p>
22	Paragraph 7.3.3, criterion 1	<p>For clarity: `... to provide a pedestrian crossing ...`</p>
23	Policy EMP2	<p>Amendment:</p> <p>`1) Limited commercial development to the north of the Railway Station as shown on the Lenham Local Policies Map will be supported. where such Proposals should not affect the function or accessibility of the station and should seek to can demonstrate that they would lead to improvements to the public realm in the area.</p> <p>2) Proposals to the south of the station for new social and commercial development to comprise a community hub incorporating a mixture of uses, including limited retail floor space and some residential development, will be supported. Any scheme should:</p> <ul style="list-style-type: none"> • be subject to an assessment of any potential impact upon existing retail provision in the village;

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		<ul style="list-style-type: none"> • deliver pedestrian/cycle connectivity to the residential development to the south; and • assess the feasibility of the scheme to deliver new or enhanced pedestrian access from the south side to the north side of the station.' <p>Reason: It is arguably onerous to require a crossing over the track as a condition of any scheme because crossing of the rail network is difficult to achieve.</p>
23	Policy EMP3(1)	<p>Amendment: `... and medium size businesses, micro businesses, flexible workspace and start-up opportunities, and live work units, are supported welcome, particularly where they reduce out-commuting.'</p> <p>Reason: Criterion 1 refers to small and medium sized enterprises, the definitions of which are 50 and 250 employees respectively. Purpose built live-work accommodation has not been a fundable use for many years.</p>
23	Policy EMP3(2)	Correction: `... and support for small ...'
23	Policy EMP3(3)	Observation: The additional test of not adversely affecting the amenity of neighbouring residents could be added.
24	Policy CF1(2)	<p>For clarity: 'Subject to the impact of proposals on residential amenity, all facilities should be ...'</p> <p>Correction: `... Proposal Proposals for new development ...'</p>
24	PolicyCF1(3)	For clarity: `... will be resisted not be supported unless ...'
25	Paragraph 8.4.10 and Policy ED4 and Lenham Local Policies Map	For clarity: Make clear the extent of the proposed site for nursery education on the Lenham Local Policies Map.
26	Policy ED3	Observation: The policy states that non-education development on this site will not be supported. The primary purpose of the site is education, but multi-functional community facilities may also be appropriate.
27	Policy TOU1(1)	<p>Delete criterion 1 and replace with:</p> <p>'Proposals which preserve or enhance the quality and diversity of the local tourism economy, including both day trips and longer stays, will be supported where they accord with other policies within this plan and the Maidstone Borough Local Plan.</p> <p>Proposals for holiday accommodation outside of the built up area will be expected to be of a high quality design and appearance, utilising materials that complement the local landscape. High</p>

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		<p>quality landscaping should be designed to enhance any built elements.'</p> <p>Reason: It is not clear what a 'tourist facility' is and thus what uses this policy is intended to be directed at. High quality landscaping should be designed to enhance, not just hide, any built elements.</p>
27	Paragraph 9.1.2 and Policy TOU1(2)	<p>Observation: Paragraph 9.1.2 refers to the 'retail offer'. It is not clear if policy TOU1(2) is expected to apply to the loss of retail facilities in Lenham. 12 months marketing is relatively brief in comparison to market cycles.</p>
28	Paragraph 10.1.1	<p>Correction: '... promotes the concept ...'</p> <p>Correction: '... promoted as a viable and attractive alternative viable and attractive alternatives to ...'</p>
28	Policy AQ1(1)	<p>For clarity: '... electric cars and vans vehicles.'</p>
28	Policy AQ3	<p>Observation: It is not clear whether this policy is intended to address freestanding energy generation schemes or the renewable generation components of development in general.</p>
30	Paragraph 11.1.7	<p>Amendment: 'This site will deliver approximately 85 dwellings and an area of Strategic Open Space ...'</p> <p>Reason: Not all open space on the site is strategic.</p> <p>Observation: The indicative parameters plan for the hybrid application at Site 1 indicates 4 pitches not 3 (due to the need to divert PROW KH399A, which has not yet been secured). Confirmation that Sport England is satisfied that the sizes of the 4 pitches are an adequate replacement of the William Pitt pitches (Site 1) is required.</p>
31	Paragraph 11.1.14	<p>For clarity: '... junction with the A20, to the north, possibly within the appeal site ...'</p>
31/32	Policy SHDS1(1)	<p>For clarity: '... a phase one ecological survey, and an appropriate mitigation and enhancement scheme, prepared to ...'</p>
32	Policy SHDS1(5)	<p>Amendment:</p> <p>'Development proposals will be supported by include a detailed Masterplan for the site to be submitted for approval by Maidstone Borough as local planning authority. The submitted Masterplan will have regard to be in general accordance with the proposals shown on the Illustrative Masterplans included within this Neighbourhood Plan. The submitted Masterplan will include details of the landscaping and public open space for the site, access (vehicular, cycle and footway) and drainage (foul and surface water) arrangements for the site, and will demonstrate how these arrangements will work in conjunction the development will integrate with the existing built fabric and</p>

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		<p>Proposed additional text emboldened, and deleted text struck through</p> <p>countryside setting of Lenham. Where the proposals relate to a larger area, the masterplan should demonstrate how the development will connect with other Strategic Housing Delivery Sites within the Village Extension areas and other proposals in the vicinity.'</p> <p>Reason: It is onerous to suggest that individual schemes should accord with illustrative masterplans within the Lenham Neighbourhood Plan.</p> <p>Observation: "Development proposals should support high quality communications infrastructure." This sentence appears to be an add-on, and is out of context with the remainder of criterion 5.</p>
32	Policy SHDS1(7)	<p>Delete: 'The development access roads, including the scheme of shuttle working at Smokey Bridge, will have capacity to accommodate all traffic movements arising when all the sites shown on this Plan are completed. The intention of the Plan is that a All the sites shown will ...'</p> <p>Reasons: The first sentence of the policy criterion is a statement. The first part of the second sentence undermines a robust policy criterion.</p>
32	Policy SHDS2	<p>Delete Policy SHDS2.</p> <p>Reason: The policy criteria is covered by Policies D1 and SHDS1 of the neighbourhood plan and the policies of the Maidstone Borough Local Plan.</p>
33	Policy SHDS3(2)	<p>Amendment: '... An indicative target is 40% one-bedroom and 2 bed- room 10% one-bedroom, 30% 2-bedroom ...'</p> <p>Reason: To reflect the findings of the Lenham Housing Needs Assessment (June 2019)</p>
33	Policy SHD Site 1	<p>Note: A hybrid planning application for 100 units has been submitted for Site 1 (ref 19/504724/HYBRID).</p>
33	Policy SHD Site 1, criterion 1	<p>Amendment: '... and approximately 85 dwellings at a density of 22 dwellings per hectare.'</p> <p>Reasons: For clarity and consistency with all site allocation policies. (Source: Lenham Masterplanning Report, Table 4).</p>
33	Policy SHD Site 1, criterion 2(i)	<p>Amendment: 'Access will be via new junctions a new junction with Old Ashford Road ...'</p> <p>Reason: That more than 1 junction is needed to serve Site 1 has not been accepted by Kent County Council (Highways and Transportation).</p>
33/34	Policy SHD Site 1, criterion 3	<p>Observation: The indicative parameters plan for the hybrid application at Site 1 indicates a further 3 pitches, not 2 (due to the need to divert PROW KH399A, which has not yet been secured).</p>

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34 and 48	Policy SHD Site 1, criterion 4; and Masterplan	Observation: The policy does not mention the 15m buffers included in the Masterplan for Site 1.
34 and 48	Policy SHD Site 1, criterion 5; and Masterplan	Observation: The illustrative Masterplan shows two accesses that have not been justified, resulting in unnecessary loss of hedgerow, and which have been objected to by Kent County Council (Highways and Transportation).
34	Policy SHD Site 2, criterion 2	Observation: It is understood that the owners of site 4 have announced that the appeal scheme (to the north of site 4) will not be amended to widen the access road, so site 4 needs to allow for an access road capable of delivering the bus route should it be required.
34	Policy SHD Site 2, criterion 3	Delete criterion 3 and replace with: ' The proposal shall enable pedestrian and cycle access to the station, including an enhanced footway along Headcorn Road together with internal routes which interconnect via Site 4 and the appeal site adjacent to the station. ' Reason: The site is separated from the station by two other allocations.
34, 36, and 37	Policy SHD Site 2, criterion 4; Policy SHD Site 4, criterion 19; Policy SHD Site 5, criterion 3; Policy SHD Site 6, criterion 9	Delete criterion in policies for Site 2(4), 4(19), 5(3) and 6(9). Reason: The criterion a statement rather than policy but, additionally, these site allocations are not dependent upon the Smokey Bridge scheme. To include reference to the scheme is unduly restrictive, and it would be onerous to retain the criteria. (Link to deletion above – page 32 amendment to Policy SHDS1(7)). Observation: An alternative criterion 4 for Policy SHD Site 2, could be ' The proposal shall demonstrate through a transport assessment that the design of both the access to Headcorn Road and internal routes provide sufficient capacity to accommodate the net traffic generation of the wider network of Strategic Housing Delivery Sites, including the potential bus route. Any application for this site in isolation should demonstrate that it will enable access to adjacent strategic sites. '
34	Policy SHD Site 2, criterion 5	Observation: It is not clear how the figure 0.5 ha of public open amenity space is calculated. Policy DM19 of the Maidstone Borough Local Plan generates a need for 2.39 ha. Even if the sports requirement is taken out and the semi-natural reduced by 2/3, the required figure would be 0.9 ha.
35	Policy SHD Site 3, criterion 13	For clarity: '... The site should also additionally provide for an area of at least 0.25 ha ...'
36	Policy SHD Site 4, criterion 16	Amendment: '... for approximately 110 dwellings at a density of 35 dwellings per hectare. ' Reason: For clarity and consistency with all site allocation policies. (Source: Lenham Masterplanning Report, Table 4).

Page no.	Paragraph/ Policy no.	Representations Proposed additional text emboldened , and deleted text struck through
36	Policy SHD Site 4, criterion 18	For clarity: `... to the south side of Lenham Station to facilitate access to proposed enhanced the provision of enhance crossing facilities ...`
36	Policy SHD Site 4, criterion 20	<p>Observation: It is not clear how the 0.5 ha is derived, and the Neighbourhood Plan should explain how open space levels across all sites have been determined.</p> <p>Delete criterion 20 and replace with: ‘The scheme shall provide for a minimum of 0.5ha of open space of a type suited to the character and location of the development. Open space should be designed to integrate with open space provision on adjacent site(s), in order to enhance its benefits to the wider community.’</p> <p>Reason: It is key that any development of this site is not undertaken in isolation of the adjacent appeal site.</p>
36	Policy SHD Site 4, criterion 21(3)	<p>Delete criterion 21, sub-criterion 3.</p> <p>Reason: The development of this site is not dependant on a link between Old Ham Lane and the Headcorn Road, so it should not be a condition of the policy. The reasonable expectation would be to demonstrate that its impact upon the network via Headcorn Road is acceptable.</p>
36	Paragraph 11.3.3	Correction: `Policy – Strategic Housing Delivery Site 5 ...`
36	Policy SHD Site 5	Note: Part of Site 5 has a resolution to grant planning permission for 139 units (ref 19/503995).
37	Policy SHD Site 5, criterion 2	Observation: Land outside the ownership of site 5 is required for the new road connection to the A20. Evidence of agreement with the landowner is needed to demonstrate deliverability of the road and, thus, the residential allocations within the plan period. The neighbourhood plan should demonstrate how the road, or an alternative means of access, will be delivered in order to reduce the risk of the plan failing to deliver the required 1,000 homes.
37	Policy SHD Site 5, criterion 6(2)	Correction: `... appropriate vehicular footpath ...`
37	Policy SHD Site 6, criterion 10	Observation: Although the sports pitches on Site 6 are proposed to be relocated to Site 1, in order to redevelop Site 6 for housing, there is a lack of justification for this, particularly given the proximity of the pitches to housing Sites 5 and 7. Sport England has not confirmed whether the indicative layout of the relocated pitches at Site 1 would be viewed as an adequate replacement of the William Pitt pitches on Site 6.
38	Policy SHD Site 7	Note: This site has planning permission for 53 dwellings (ref 18/506657/FULL), and development is to commence shortly.
40	Paragraph 12.2.1	Amendment: `... and which will may include contributions from the Borough-wide strategic infrastructure fund.`

Page no.	Paragraph/ Policy no.	Representations Proposed additional text emboldened , and deleted text struck through
		Reason: There is no certainty that strategic CIL funds will be allocated to these projects because it is an annual bidding process.
40	Table LNP ONE - title	Correction: ' Community Strategic Infrastructure Levy Projects and Exclusions.'
41	Paragraph 12.2.6	For clarity: 'There is a separate project immediately to the south of the station, which is within the same ownership as site 3 , within Site 3 immediately adjacent to the station to that will facilitate a new local centre for the southern sites, this could incorporate retail, residential and some employment uses.'
41	Paragraph 12.2.7	Correction: '... authorities the CIL project ...'
43	Glossary	Community Infrastructure Levy: 'Parishes with a made Neighbourhood Plan ...' Development Plan: '...replace it), the Kent Minerals and Waste Local Plan , and ...' Delete: Greenfield Site and Planning Practice Guidance definitions because these terms are not used in the document.
47	Lenham Local Policies Map	Observation: An inset map for Lenham Village would be helpful because the boundaries of allocated and designated sites are not always clear.
48	Plan 1 – Site 1 Masterplan	Observation: The Masterplan is factually incorrect as it omits the definitive line of "existing footpath" KH399A. It has a buffer in excess of 30m on the south side so does not correlate with the Masterplanning background paper as that requests in section 3.3, a 15m wide buffer on the east and south of the housing area. It does not correlate with the existing planning application's parameter plan in a number of regards (and to which the PC does not object).

Yours faithfully,

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