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### **BY EMAIL ONLY**

17 April 2020

Dear Nicola

### **Re: Lenham Neighbourhood Plan - Regulation 16 Consultation Submission Version**

Thank you for consulting Kent County Council (KCC) on the Lenham Neighbourhood Plan (the Neighbourhood Plan), in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, provides comments structured under the chapter headings and policies used within the Neighbourhood Plan.

### **Lenham Neighbourhood Plan – Regulation 16 Consultation**

#### **1. Introduction**

In principle, the County Council, as Local Highway Authority, has no objections to the Neighbourhood Plan, provided that the proposed modifications within this response are implemented.

The most pertinent matters relate to the deliverability of the proposed road junction onto the A20 and the need for associated planning applications to be supported by Transport Assessments that identify the cumulative impacts and full extent of the required mitigation.

The County Council welcomes the inclusion of policies which seek to ensure that the character of Lenham is retained, both in terms of the built environment, through good design of public and private realm, and through establishing policies which seek to retain the quality of the landscape and setting of the Kent Downs AONB.

## 2. Lenham Today

### 2.1 The Study Area – paragraph 2.1.4

The Parish Council should be aware that Lenham is an important medieval village with a large number of surviving historic buildings and a street plan that retains its medieval origins. Its history and development were reviewed by KCC in 2004<sup>1</sup> and the report remains a useful guide for assessing the historic impact of development proposals.

In addition to the listed and historic buildings and the medieval street plan, the village will contain archaeological remains relating to the heritage assets mentioned and earlier periods. For example, early Saxon graves have been found at the main crossroads in the centre of the village and a Saxon pit found on Faversham Road.

Beyond the village centre, there have been numerous discoveries from all archaeological periods. There are no definite Palaeolithic discoveries from Lenham, but there are numerous discoveries of Mesolithic flint implements from the parish. This includes an important site found at Sandway Road during the Channel Tunnel Rail Link excavations, as well as scrapers, blades and cores from elsewhere. A Neolithic axe was found at Lenham Court and many Neolithic flints from Chapel Farm. Bronze Age features have also been found at Sandway Road, Chapel Mill and Chapel Farm and there have also been several finds of bronze age metalwork including socketed axeheads, chisels, ingots and spearheads. A large iron age enclosure, related features and finds have been found east of Royton Manor by the Lenham Archaeological Society and iron age metalwork has been found across the parish. The Romano-British period is represented by pits and ditches found at Lenham Community Centre, as well as a cremation burial from Runhams Farm and a ditch at Groom Way. Other finds, such as a 2<sup>nd</sup> century flagon, iron slag, roof tile, pottery and numerous coins also suggest the landscape around Lenham was widely exploited in the Roman period.

The heritage of later periods should also not be forgotten. There are several post-medieval farmsteads, many of which may well have medieval origins. Chilston Park, a Registered Park and Garden, is an important 17<sup>th</sup> century formal garden replaced by a 18<sup>th</sup> century landscape park. The Lenham Cross commemorates the dead of the First World War, the Second World War is represented by an auxiliary hide and several aircraft crash sites and the Cold War by a Royal Observer Corps underground monitoring post.

Finally, it should be noted that all these assets, and indeed Lenham village itself, sit in a historic landscape. The landscape contains many surviving historic features, such as the patterns of tracks, lanes and hedgerows that give character to the parish. When considering the impact of either development or intensive agriculture on the countryside, it is important to understand the historic development of the landscape so that its essential character can be conserved. The Kent Historic Landscape Characterisation (2001)<sup>2</sup> has identified the broad historic character of the landscape of Kent. Where it is to be applied locally, further study is needed to refine its conclusions. However, it remains an essential tool for understanding Lenham's landscape. To be fully effective, the Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis at a parish level, to add greater detail

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<sup>1</sup> [http://archaeologydataservice.ac.uk/archives/view/kent\\_eus\\_2006/downloads.cfm?area=Lenham](http://archaeologydataservice.ac.uk/archives/view/kent_eus_2006/downloads.cfm?area=Lenham)

<sup>2</sup> [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0014/56210/Kent-Historic-Landscape-Character-volume-1.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0014/56210/Kent-Historic-Landscape-Character-volume-1.pdf)

through secondary sources. This would make a good volunteer project for the Parish Council and KCC would welcome engagement to discuss this opportunity further.

Para 2.1.4 also states “*There is a presumption against development outside such boundaries (meaning the boundaries of the village).*” It should be noted that there has always been change in rural areas. KCC has worked with English Heritage (now Historic England) and the Kent Downs AONB to prepare guidance on how historic farmsteads in Kent can be assessed for their suitability for new development or change of use<sup>3</sup>. Where such development is permitted, it is important that it is in keeping with the existing character in terms of size, layout, routeways, massing and materials and that any archaeological remains associated with former phases of use are treated appropriately in the development control process.

## **4. Design Quality**

### ***4.1 High Quality Design and Local Distinctiveness***

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

The County Council is supportive of this policy and would like to refer the Parish Council to the comments provided on the historic landscape (paragraph 2.1.4). It is important that the points raised are considered in order for the Neighbourhood Plan to succeed in its goals as set out within this policy.

### ***4.3 Innovation and Variety***

#### ***Innovation and Variety: Policy D3***

The County Council is supportive of this policy. Good design is a crucial element in creating spaces that are safe, secure, of high amenity and encourage active travel. This will result in encouragement of the public to walk, cycle and spend time outside, which will deliver positive health and wellbeing outcomes.

## **5. Promoting Active, Smarter and Sustainable Travel**

The County Council recommends reference to the Rights of Way Improvement Plan<sup>4</sup> (ROWIP). The ROWIP provides further policy and evidence base, supporting the ambitions and delivery of the Neighbourhood Plan.

The promotion of active, smarter and sustainable travel is welcomed. It is encouraging to see that reference is made to the Rights of Way Design Guide, further emphasising the importance of well-designed and thought out access provision.

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<sup>3</sup> <http://www.highweald.org/look-after/buildings/farmsteads-and-hamlets.html>

<sup>4</sup> [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf)

## **5.1 Walking and Cycling / 5.3 Community Infrastructure Levy Funded Projects**

### **Active Travel: Policy AT1 / Active and Sustainable Travel Projects: Policy AT4**

The County Council is supportive of Policies AT1 and AT4. The County Council encourages the importance of involving the County Council Rights of Way and Access Service in the housing and infrastructure delivery of elements of the Neighbourhood Plan.

## **6. Enhancing and Protecting Green Space**

The County Council, from a Public Rights of Way (PRoW) perspective, is supportive of policies that seek to integrate access provision with green space. The quality of the environment through which access routes pass through should be considered as important as the construction of the route.

### **6.1 Natural and Amenity Green Space**

#### **Natural and Amenity Green Space: Policy GS1**

The Neighbourhood Plan appropriately considers the importance of new developments making access provision that ensures proposed developments link with services, facilities and public transport.

The County Council welcomes the consideration of the need to improve the surrounding existing PRoW network and the importance of new provision integrating with the existing PRoW network.

As Lead Local Flood Authority, the County Council welcomes recognition within the Neighbourhood Plan of the importance of sustainable drainage systems.

### **6.9 Local Green Space Policy**

#### **Countryside Protection: Policy CP1**

The County Council would refer back to comments under paragraph 2.1.4, relating to historic farmsteads, which are also applicable to this policy.

## **8. Community Facilities**

### **Additional Commentary**

The County Council would like to see waste included within this section. Whilst the County Council is not requesting a site for a new Household Waste and Recycling Facility (HWRC) to be included within the Neighbourhood Plan, it does request that the need for expansion of the Maidstone HWRC in the short term and its relocation in the long term be recognised. Parishes such as Lenham will find accessing these facilities more difficult in the future, as demand from new development across the Borough increases. Lenham is already less well served than some villages, being a 15 to 20 minute drive from current sites, and will

experience future capacity issues unless identified projects are supported. Similarly, additional capacity at Material Recycling Facilities will be required. The County Council therefore proposes the following paragraphs are included within the Neighbourhood Plan:

## 8.5 Waste

*8.5.1 The construction of 1000 dwellings on the Strategic Housing Delivery Sites (SHDS), together with the construction of the existing housing commitments in Lenham (364 dwellings), will create a requirement for additional capacity at Household Waste Recycling Centre (HWRC) facilities and Material Recycling Facilities (MRF) to serve the Parish.*

### *Waste: Policy W1*

*The Neighbourhood Plan supports additional investment in HWRC capacity by the expansion of the existing Maidstone HWRC in the short term and relocation to allow the further required increase in capacity over the life of the Local Plan. It also supports securing appropriate development contributions towards the strategic project to secure processing capacity at an MRF for kerbside collected recycling.*

## **10. Air Quality and Renewables**

### **10.3 Renewable Energy Generation**

The County Council is supportive of a policy that encourages renewable technology in new developments, and would also highlight the need for high standards of energy and water efficiency to reduce energy demand. Biomass boilers can contribute to air pollution, so their installation should not be encouraged in urban areas with poor air quality.

### **Renewables: Policy AQ3**

The text states that applications for renewable energy schemes will be required to demonstrate that they do not have a significant adverse effect on a range of environmental issues, among them heritage issues. The County Council is supportive of this but would note that the heritage of Lenham can actually play a more constructive role in energy conservation. The historic environment has a significant role to play in the conservation of resources required for development and also in energy efficiency. Old buildings can often be more energy efficient than newer ones and benefit from already being constructed. Thus, it may take fewer overall resources to adapt an old building than to demolish it and build a completely new one. Historic England has produced guidance ('Climate Change and the Historic Environment', 2008<sup>5</sup>) that reviews the threats to the historic environment posed by climate change. The guidance also demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change and more energy efficient than more modern structures and settlements.

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<sup>5</sup> <https://www.rbkc.gov.uk/pdf/73%20Climate%20Change%20and%20the%20Historic%20Environment%202008.pdf>

## **11. Strategic Housing Delivery Sites**

### Paragraph 11.1.14

The wording here highlights how there is uncertainty over the deliverability of the road junction onto the A20. Confirmation is required on whether the relevant landowner has agreed to the use of land for provision of the junction. If their agreement has not been obtained, the Plan should identify an alternative strategy to ensure the developments can be provided with the road infrastructure needed to support them.

### ***Policy SHDS1: Strategic Housing Delivery Sites: General Requirements***

The need for sustainable drainage systems is acknowledged within the proposed policy, which should address the need for attenuation and flow restriction. The County Council recommends that this policy also explicitly addresses the form or quality of sustainable drainage systems which are proposed and should take into account the NPPF guidance, which clearly states the requirements for these features to be multi-functional.

#### Criterion 2 (i)

The policy should refer to one 'all purpose' access junction and an emergency access onto Old Ashford Road, as already required by KCC Highways and Transportation in relation to planning application 19/504724. The scale of development does not warrant two 'all purpose' access junctions.

Plan 1 on page 48 should also be updated to reflect this.

#### Criterion 2 (ii)

The required footway/cycleway should extend along Old Ashford Road/Ashford Road to connect the site with existing employment at Ashmill Business Park/Northdown Close. Provision of this nature is identified in the Transport Assessment supporting the Neighbourhood Plan and has been required by KCC Highways and Transportation in relation to planning application 19/504724.

### ***Policy SHDS2: Housing Delivery Sites: Design Principles***

The County Council recommends that for all proposed development sites, any attenuation is provided at surface and that the multi-functional benefits of these areas are promoted. The County Council also recommends that any local watercourses are incorporated into the layouts of proposed residential developments.

#### Criterion 6 (and Policy SHDS4 criterion 21)

It should be clarified that Policy SHDS2 will be required to deliver the development's access road that will form part of the new road link between Old Ham Lane and Headcorn Road, as existing planning consents preclude such provision from being achieved via Policy SHDS4.

**Policy SHDS2/criterion 4, Policy SHDS3/criterion 11, Policy SHDS4/criterion 19, Policy SHDS5/criterion 3 and Policy SHDS6/criterion 9**

These policies should require that a Transport Assessment is submitted in support of any planning application to demonstrate how the existing and proposed highway networks will accommodate the cumulative impacts of the allocated sites. This is particularly important in ensuring that off-site mitigation, such as on the A20 corridor towards M20 J8, can be secured if found to be necessary.

***Land West of Old Ham Lane and North of the Railway – Policy – Strategic Housing Delivery Site 5***

To ensure consistency with the other land allocation policies, the County Council recommends that this policy could include another criterion that requires:

*‘A demonstration of how the proposals are consistent with the provision of a satisfactory development access road link between Old Ham Lane and Ashford Road’.*

Criterion 6

It should be noted that the linkages to Site 6 will be limited to pedestrian/cycle due to the Site 6 layout approved via permission 18/506657.

**12. Implementing the Plan: Community Infrastructure Levy, Developer Contributions and Planning Conditions**

There is a general expectation that improvements to access will be delivered within sites through good design; with masterplans clearly indicating the alignment of access routes, layout, green space and links to existing provision. It is important that these new links are public highway (whether adopted public highway or public rights of way). These will be important links for the whole community. Management of amenity areas should be the responsibility of management companies and plans should encourage and require this.

In respect of the improvement of the wider PRow network, potentially including the upgrade to existing routes, it would be helpful if this could be identified by Maidstone Borough Council as Charging Authority, as an infrastructure project that will be resourced through Community Infrastructure Levy (CIL). The County Council recognises that some developments will seek developer funding through section 106 contributions or unilateral undertakings to mitigate an impact that arises as a direct result of a development. This will not however provide for the improvement of the wider network for the benefit of all.

**12.2 Strategic Infrastructure Projects**

Table LNP 1

The *‘junction of southern development access road with Headcorn Road’* should be for Site 2 to provide via planning conditions/S278 agreement.

The references to contributions from Site 7 do not take account of permission 18/506657, which secures no such contributions.

It should be noted that the supporting 'Strategic Infrastructure Delivery Report' (dated August 2017) is inconsistent with the Regulation 16 Neighbourhood Plan. Of particular note is the reference to KCC Highways and Transportation delivering highway works in paragraph 6.2.4, which the Neighbourhood Plan helpfully confirms are actually to be delivered by Site 3.

### **Additional Comments**

The County Council recommends that the Parish Council includes a section on the Natural Environment and Ecology. Within this section, the Parish Council should set out that all developments in the Parish must adhere to the following:

- Requirement for Ecological Impact Assessments.
- Retainment and enhancement of connectivity throughout the site and to the surrounding area.
- Requirement for Assessment/implementation of biodiversity net gain (as per the Environment Bill proposal).
- The mitigation hierarchy.
- Requirement for development to ensure that they are managing open space to benefit biodiversity.

### **Strategic Environmental Assessment (SEA)**

#### **Sustainable Urban Drainage Systems**

The SEA gives very slight coverage of impacts in relation to flood risk and a number of sites have no identification of flood risk which may be related to surface water. It is also noted that the baseline assessment of water resources makes no reference to the surface water maps of flood risk.

Lenham does experience issues in relation to local flood risk, with incidents for carriageway flooding, local ditch problems and flooding in relation to the rural nature and agriculture fields. There are a number of surface water flood routes which are shown crossing the parish area. These do cause specific issues and need to be accommodated within any master-planned development.

The County Council has entered into discussions with applicants for proposed development in Lenham and these matters have been emphasised where required. It should be highlighted that space to accommodate surface water may be significant and it is important that an estimate of spatial requirements should be undertaken early in the planning process.

It should be noted that the masterplans for sites 1 - 4 may not have sufficient space required for surface water management illustrated within the indicative masterplan. This may reduce

the number of residential units which can be delivered within a proposed site given restrictions on developable area.

### *Heritage Conservation*

The County Council notes that this SEA considers development around Lenham and highlights seven preferred sites for development. The following information provides a baseline assessment of key archaeological and archaeological landscape issues for those seven key sites, as well as general commentary.

A comment on the SEA is that broadly, the consideration of “Landscape and Historic Environment” does not consider the rich and diverse archaeological resource within and around Lenham village. This resource is reflected in the numerous archaeological and PAS sites and in the visible archaeological landscape of ancient field systems, utilisation of the water channels and routes of the footpaths and lanes.

However, the table of SEA Objectives does contain a welcome aim to protect, maintain and enhance the cultural heritage, including archaeological assets. Unfortunately, the corresponding “assessment questions” are limited and focus on the built historic environment. These assessment questions should preferably include how development will impact on the archaeological resource. An added query should also be how the awareness, understanding and enjoyment of the archaeological heritage of Lenham can be developed appropriately.

KCC notes and welcomes SEA paragraph 4.37, with the Lenham Neighbourhood Plan Group identifying criteria 2: Historic Environment, but would encourage consideration of the protection and preservation of historic assets, including buried archaeological remains, within and around the fabric of the village. Lenham, being a Medieval market town, has a close and long relationship with the countryside around it, but there are signs that Lenham has had an integral and complex relationship with the landscape of springs and channels since the Roman Period or before. Identifying and encouraging preservation of the archaeological resource in and around Lenham village will ensure that awareness, understanding and enjoyment of Lenham’s rich archaeological heritage is not lost in new development schemes but is preserved for future generations intact, in situ.

The County Council notes that paragraph 5.18 suggests that whilst none of the development allocations proposed are known to contain any designated heritage assets, they do contain known non-designated heritage assets, some of which may be of equivalent significance to designated assets. As such, NPPF paragraph 194 (footnote 63) should be taken into account.

Within Section 5, covering the landscape and historic environment, the County Council notes that this does not seem to address any key points for the archaeological resource of Lenham. KCC would encourage that there should be some guiding statements on the need to consider the archaeological resource with identification, retention, preservation and interpretation as key aims – thereby contributing to the sustainability and soundness of the Neighbourhood Plan.

PAG 1: Land North of the A20 Ashford Road East of Marley Works and West of the AONB: The PAG does not contain any known archaeological sites identified on the HER or PAS data. However, this may reflect the lack of formal investigation on the site rather than lack of archaeology, given the nature and extent of known archaeological sites in the surrounding area.

PAG 2: North West of Lenham Village Extension (PAG 2): including 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. This site does contain known PAS findspots and does have potential for significant archaeological remains. The limited nature of known remains may reflect the lack of formal investigation on the site rather than a lack of significant archaeology.

PAG 3: Land south of the Railway and West of Ham Lane: KCC welcomes the acknowledgement of the historic, designated buildings within this site but would raise the issue of high potential for buried remains, possibly associated with an early medieval settlement around Lenham Court.

PAG 4: South West of Lenham Village Extension (PAG 4): Site 2 - Land West of Headcorn Road and North of Leadingcross Green; Site 3 – Land East of Old Ham Lane and South of Railway; Site 4 – Land West of Headcorn Road and South of the Old Goods Yard: KCC welcomes the acknowledgement of historic designated buildings but would additionally highlight the potential for buried archaeological remains.

PAG 5: Land south of the railway, East of Headcorn Road and North of Oxley Wood: This PAG does contain a recorded PAS find of Roman pottery, which may indicate a more widespread Roman archaeological site.

PAG 6: Land North of the Railway, East of Lenham Village and South of the A20 Ashford Road: The historic environment assessment needs to take in to account the numerous known archaeological sites and PAS finds within this site. The HER shows several sites, some of which are based on the findings of the Local Heritage group, and there are strong indications of significant remains surviving in this site. Recently, a Roman building and associated remains have been located north of the Old Ashford Road and similar remains may extend southwards. The site also contains remains associated with Bone Mill, a post medieval or earlier mill complex which may have been a focus for activity prior to the medieval period as well. This site borders one of the channels feeding into the Stour and as such may have been quite a focus for activity from the Prehistoric Period onwards. There are also several archaeological landscape features which need to be thoroughly assessed and preferably integrated in to any draft master-planning options.

PAG 7, North East of Lenham Village Extension: Site 1 – Land South of Old Ashford Road: this site does contain several PAS findspots and there are known archaeological sites and landscape features recorded around and within it. It is likely to contain some of the Roman remains continuing east from the site north of Old Ashford Road.

## *Waste Management*

The County Council is pleased to see the promotion of sustainable waste management solutions in the SEA Document, Section 5.28. This primarily relates to the statutory duties of Maidstone Borough Council as the Waste Collection Authority. KCC is the Waste Disposal Authority with a statutory responsibility under the Environmental Protection Act 1990 for the handling and final disposal/treatment of all waste collected from residential properties within the administrative boundary of Kent.

The County Council notes that there are minimal references to waste, in particular the pressure additional housing will place upon waste infrastructure for the handling and disposal/treatment of waste. Delivery of the approximately 1,000 homes within the Lenham Parish will place significant demand upon KCC Household Waste Recycling Centre (HWRC) facilities in the area. It will also increase demand for recycling facilities that deal with kerbside collected waste, known as Material Recycling Facilities (MRF), for which there is a national shortage.

The County Council would like to see the need for appropriate development contributions towards new waste infrastructure in the wider area being made by new housing developments within the Lenham Parish. KCC acknowledges that there are currently no waste management facilities within the Lenham Parish. These types of facilities are strategic in nature, serving a wide area, typically at district level. Both the Maidstone HWRC at Tovil and the Ashford HWRC at Brunswick Road, which serve the residents of Lenham Parish, are at operational capacity and hence any increase in waste tonnages in the future as a result of development would require mitigation.

For the awareness of the Parish Council, it should be noted that KCC has recently submitted two projects for inclusion in Maidstone Borough Council's Infrastructure Delivery Plan, both of which are required to increase waste capacity at the Maidstone HWRC as a direct consequence of planned residential development in parishes such as Lenham. The County Council also has a larger strategic project to secure processing capacity at MRF for all recycling collected at the kerbside by the WCA.

## **LNP – 6 – Masterplan**

### *Heritage Conservation*

Sites 1 and 5 may contain significant archaeological remains, which may be a constraint on development, but if considered at an early stage, may provide positive contribution to the quality, sustainability and character of the development.

## **LNP-9 - Archaeological Desk Based Assessment (DBA)**

This policy covers the buried archaeological potential of proposed housing Site 1 (Area A) and Sites 2 – 7 (Area B). It does not provide an assessment of the archaeological resource in and around Lenham and its focus is simply on the proposed housing developments. In view of this approach, the DBA is of limited value as a contributing report for the

Neighbourhood Plan as a whole, although it is useful as a baseline assessment to inform consideration of the Sites 1 – 7.

The DBA provides baseline description of most of the known archaeological data, including PAS findspots within the Sites 1 – 7, but it does not analyse the data, assess the nature of the findings, nor assess the landscape context. For example, the DBA should preferably recognise that the topography is quite complex and related to the series of springs and collects which feed in to the River Len to the west but also to the south feeding in to the Great Stour. The springs and collects form a river valley system with considerable influence on the landscape and the use of this area over thousands of years. Analysis of the nature and distribution of currently known PAS findspots and archaeological sites suggest Lenham may be the focus of distinctive and possibly unusual Later Prehistoric, Roman and Early Medieval activity.

More in-depth assessment of the baseline data would be useful to provide a better understanding of the nature and potential significance of the archaeological resource around Lenham. The DBA Executive Summary and the later conclusions and recommendations are not suitable and reflects a rather over-simplification of the potential for evidence of activity from Prehistoric Period onwards, some of which may be of national importance. The archaeological resource and landscape, based on current information, is complex and may include sites of national importance. This archaeological resource is a special part of Lenham's heritage but may also be a constraint on development. As such, the DBA Assessment of Significance tables within 4.114 do not reflect reasonable assessment of potential. The County Council does not agree, at this stage, with the DBA conclusions, the recommendations that for the Sites 1 – 7 archaeological issues can be covered by conditions, nor with the with the Assessment of Significance tables at 4.114.

More in depth assessment is needed to appropriately understand the archaeological heritage of Lenham and to inform the extent of development around Lenham. More in depth assessment may need to include targeted fieldwork.

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KCC would welcome continued engagement as the Lenham Neighbourhood Plan progresses.

If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely



**Barbara Cooper**  
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