

Planning decisions October 2022

22/504198/SUB	The White Horse Inn Lenham Heath Road Sandway Kent ME17 2HY	No Comment
22/504647/LAWPRO	Mobile Home Warren Lands Lenham Heath Road Sandway Maidstone Kent ME17 2NB	Refused prior to LPC objection and comment submission.
22/504601/SUB	Land North Of Old Ashford Road Lenham Kent	No Comment
22/504368/FULL	Little Gaynes Faversham Road Lenham Kent ME17 2PU	See Appendix 1 below
22/503566/FULL	62 Maidstone Road Lenham Kent ME17 2QJ	See Appendix 2 below
22/504268	8 The Square Lenham Kent ME17 2PQ	No comment
22/504468/FULL	Len Valley Practice 1 Groom Way Lenham Maidstone Kent ME17 2QQ	See Appendix 3 below
22/504308/FULL	Highfield Faversham Road Lenham Kent ME17 2EX	No Comment
22/504631/FULL	Dickley Wood Ashford Road Harrietsham Kent ME17 1BJ	No comment.
22/504669/FULL	Wyndrush 6 Headcorn Road Platts Heath Kent ME17 2NH	See Appendix 4 below
22/505013/SUB	Lenham Court, The Coach House Old Ham Lane Lenham Kent ME17 2LS	No Comment

Appendix 1

Representation on application 22/504368 Little Gaynes, Faversham Road, Lenham, Kent.

Lenham Parish Council objects to this application for the following reasons and should the Planning Officer be minded to approve it we would ask that it is called into Committee at which we would seek representation.

1. This site lies within the Area of Outstanding Natural Beauty to the north the A20 Ashford Rd and beyond the defined village boundary of Lenham. The Eastern Boundary is adjacent to the Lenham Cemetery which is an area of quiet meditation and remembrance. This is not conducive to the close proximity of housing and gardens.

2. The principal of the development of this site was considered very recently in the preparation of Lenham Neighbourhood Plan .The Examination of the Neighbourhood Plan was the subject of a report , dated 30th of June 2020, written by the Independent Examiner, Derek Stebbing. The submission version of the plan had considered many options for residential development in and around the village of Lenham with the conclusion that the site at Little Gaynes was not suitable for inclusion within the defined settlement boundary of the village. That conclusion, that the application site was not appropriate for development, was supported by the Independent Examiner in his report.

3. At paragraph 4.66 of his report Independent Examiner wrote as follows:

“I am also satisfied that the selection of the sites has followed a rigorous consideration of evaluating alternative spatial options for accommodating the planned growth in the Parish and the testing of those” reasonable alternatives”, particularly through the SEA process. I consider that the development strategy in the draft Neighbourhood Plan has taken account of the environmental and landscape constraints relating to the Kent Downs AONB and maximises the potential sustainability benefits of the preferred sites in the vicinity of Lenham village.”

The Parish Council has had regard to the material submitted with the current application and does not consider that there is any reason to reverse the well- argued endorsement of the Neighbourhood Plan strategy made as recently as 2020 by the independent Examiner.

4. The application site forms an integral part of the AONB. Although part of it currently contains built form this is not the case for the entirety of the site. The Parish Council therefore concludes that the introduction of speculative executive housing , albeit designed using high-quality sympathetic materials, would amount to a highly intrusive suburban housing estate in the countryside detrimental to the character of this important entrance to the village of Lenham with its historic conservation area. The development would add to the perception of unrestricted sporadic urban sprawl along the A 20 Arterial Road to the severe detriment of both the countryside and the setting of Lenham village.

5. There is no need for the provision of additional housing within the Parish at the moment because the Neighbourhood Plan and the numerous extant planning permissions have met all the potential housing needs of the local community at least until 2031. There is, therefore, no need to provide additional housing in order to meet any unmet essential local housing requirements.

6. Refusal of the current planning application would be consistent with the Borough Council's recent refusal of the planning application to develop the site of Victoria's nightclub to the north of the A 20 Ashford Rd some 1 km to the west of the current application site. Refusal would also be consistent with the Borough Council's recent refusal of planning application 22/501002 at Ashford Road, Harrietsham, some 2km to the west. Should all three planning applications be granted, and constructed, the net result would be the extension of sporadic development severely eroding the perception and the actuality of the green, undeveloped strategic gap between the villages of Harrietsham and Lenham.

7. The A 20 between Charing and Hollingbourne is currently operating at capacity with severe delays experienced at the Leeds Castle roundabouts during the peak hour at both the morning and evening peaks. The Parish Council would request that a cumulative transportation impact of the following developments should be prepared before any further development is considered which would access onto the A 20 in this area:

A. The development of the 1000 dwellings released through the Lenham Neighbourhood Plan which was "made" on 14th of July 2021 following the Examination referred to above and a successful Referendum held in the village which endorsed the proposed development strategy.

B. The remaining allocations released through the existing Maidstone Borough Local Plan, 2017 including the development of Tanyard Farm for approximately 150 dwellings. The Tanyard Farm site lies some 500 m to the east of the application site. The development, which is currently under construction, contributes to the cumulative visual impression of urban sprawl along the A20 referred to above.

C. The large industrial estate currently being constructed at Woodcut Farm immediately adjacent to junction eight of the M 20.

D. The massive sandpit proposed at Mount Castle Farm some 2 km to the east of the current application site and which will take its access via the A 20.

E. The traffic congestion being generated post-BREXIT when operation BROCK is activated. At such times the A 20 becomes the de facto route for all traffic seeking to arrive at the Channel ports . At such times the M 20 between junctions eight and nine functions as a very large commercial vehicle car park. The net effect of this operation is to produce gridlock in surrounding villages including Lenham.

F. Further development within the Leeds Langley corridor which will result from the implementation of policy LPR1 in the current 2017 Maidstone Borough Local Plan as well as policy LPR SS1(7) within the Maidstone Borough Local Plan Review.

8. Analysis of the data shown on " Crash map" reveals no less than 13 personal injury accidents have occurred in the vicinity of the appeal site at the junction of the Faversham Road with the A20 Ashford Road over the last 10 years. Five of these accidents are noted as serious and a fatal accident was recorded on the 8th of October 2017. A total of 27 vehicles were recorded as being involved in personal injury accidents over that 10 year period of time. A total of 19 casualties were also recorded. Lenham Parish Council believes this junction is inherently exceptionally dangerous. The Parish Council is aware of the reduction in the speed limit to 50 mph and also a change in the design of the pedestrian refuges which are provided. Despite these changes the Parish Council believes that the severe accident record at this junction, which is very well-known in the locality, will be a severe barrier to the ability of the residents in the proposed dwellings from being able to walk to the village centre in a safe and secure manner. The severe accident record can only be worsened by the additional traffic which is proposed to be generated at the junction on the Faversham Road which would be located immediately adjacent to the location of the accident blackspot. There is not a complete footway from the proposed development to the A20. This would result in pedestrians needing to step into the carriageway in the area of the junction creating a severe risk of further serious accidents.

9. Natural England has expressed concern regarding pollution arising in the Great Stour River catchment and the implications this has for eutrophication of the waterway at Stodmarch which lies to the east of Canterbury. The Parish Council would wish for any nutrient neutrality off-setting arrangement which may be entered into with Forestry England to be only approved and maintained to the satisfaction of the Environment Agency and Natural England. The Parish Council understood that the woodland was going to be provided by Forestry England in any event .The Parish Council therefore cannot understand how the potential off-setting contribution which is under discussion could increase the mitigation which would, and should, have been achieved anyway by the proper implementation of the publicly funded Forestry England project.

10. Southern Water Services (SWS) has known since the adoption of the Maidstone Borough Local Plan in 2017 that 1000 additional dwellings would be provided at Lenham. The Wastewater Treatment Works (WWTW) at Lenham is currently running at or beyond to its proper environmental capacity and is unable to accommodate any further flows without a significant improvement. SWS has failed to make timely provision for the necessary improvement at the Lenham wastewater treatment works within its financial planning. The earliest that the improvement needed to serve the Lenham Neighbourhood Plan 1000 dwelling sites can be constructed is following the

implementation of the SWS financial plan for 2025. This constraint, which should result on an embargo against the grant of any significant residential planning permissions, applies irrespective of the current embargo as a result of the nutrient neutrality issue.

11. In its evidence to the current Maidstone Borough Local Plan Review (ED 31) the Borough Council has put back the implementation of the Lenham in Neighbourhood Plan 1000 dwellings sites to post 2031 in its Borough-wide housing trajectory. The reason for this delay is because the Borough Council wishes to secure an enhanced wastewater treatment works at Lenham to serve its own project for 5000 additional dwellings and 5000 additional jobs at Lenham Heath in addition to the 1000 additional dwellings arising from Lenham Neighbourhood Plan. There should therefore be an embargo on the release of any further residential development sites at Lenham until such time as this issue of capacity at Lenham wastewater treatment works can be resolved. The outfall from the wastewater treatment works is to Upper Stour River which has a very low rate of flow. There is no certainty that ANY additional wastewater treatment capacity can be accommodated at Lenham wastewater treatment works because of the limitation imposed by the environment agency regarding the quality of the effluent which can be discharged into Upper Stour River. There is no certainty that the Environment Agency will grant the necessary discharge licences into the Upper Stour because of the low flow and the water quality issue.

12. Because of the barrier effect of the A 20 adjacent to the site the Parish Council does not believe that this is a location which can accommodate sustainable development. Rather that the development is going to require the potential future residents to use their private motor vehicles in order to make a safe access to the facilities in the village centre. The development is therefore essentially car based in its origin and would be primarily car based in its execution.

13. An example of this results from the school catchment at Lenham primary school which is such that the potential future occupants of these dwellings would be excluded. Any children of primary school age living in the houses which are applied for would therefore almost certainly have to be driven to another more distant primary school such as at Platts Heath or Harrietsham, assuming those primary schools continue to have any spare capacity. Lenham Parish Council considers it would also be fundamentally unsafe to permit these houses because some of the children of secondary school age would need to immediately cross the very dangerous A 20 adjacent to the site in order to walk to the Lenham School.

14. For the above reasons the application is contrary to well-established policies contained within the National Planning Policy Framework, the Maidstone Borough local plan, its emerging replacement, and the Lenham Neighbourhood Plan all of which aim to prevent intrusive, unsustainable development in the countryside. Lenham Parish Council would therefore respectfully request that this application be refused and that the Borough Council maintain the consistent application of policies which are aimed at preventing sporadic, unplanned, urbanising development within the countryside and along the A 20 arterial road, which forms the southern boundary to the AONB.

Appendix 2

62 Maidstone Road, Lenham -22/503566

Lenham Parish council objects to this application. The reasons are outlined below.

Should the planning officer be minded to approve we would ask that it is called into Committee and would we would wish to make representation at the meeting.

1. The site is not part of the approved Lenham Neighbourhood Plan (made on 14th July 2021) which details the siting of some 1500 houses to be built during the period 2017 to 2031 as required by the borough council.

During the examination of the Lenham Neighbourhood Plan, the Independent Examiner, Derek Stebbing wrote a report dated 30th June 2020. At paragraph 4.66 of the report is as follows:

“I am also satisfied that the selection of the sites has followed a rigorous consideration of evaluating alternative spatial options for accommodating the planned growth in the Parish and the testing of those” reasonable alternatives”, particularly through the SEA process. I consider that the development strategy in the draft Neighbourhood Plan has taken account of the environmental and landscape constraints relating to the Kent Downs AONB and maximises the potential sustainability benefits of the preferred sites in the vicinity of Lenham village.”

The Parish Council has had regard to the material submitted with the current application and does not consider that there is any reason to reverse the well-argued endorsement of the Neighbourhood Plan strategy made as recently as 2020 by the independent Examiner.

2. The site is on a narrow triangular piece of land bordered by the A20 to the North and the Maidstone Road which is an access into the Village. Any housing on this site will suffer both from the noise and pollution generated by the A20. During instances of operation Brock the noise and pollution will be constant for 24 hours of the day. Screening from the A20 will certainly be necessary perhaps by acoustic fencing or trees or both.

In terms of the Maidstone Road this is effectively a slip Road (as per a motorway slip Road) angling off the A20. At the location of the site the speed limit is still 50mph as per the A20

The Parish Council monitors traffic on the Maidstone Road further towards the Village within the existing 30 mph limit.

The last study showed the following:

Location	Time Period	Number Vehicles approaching the Village	85 percentile speed* mph	Number vehicles not exceeding percentile	Max speed recorded mph
Lenham Maidstone Rd. at Swadelands Close	21/4/22 for 35 days	33,400	33.8	28,390	70

As stated nearer the A20 within the 50mph limit speeds will be higher and any pedestrians or vehicles exiting from the site will be at severe risk given that there is no pavement and the narrowness of the road itself.

We would certainly consider it a reasonable planning condition if approval is given that a pavement is created from the site to join with the pavements further down the Maidstone Road.

3. Refusal of the current planning application would be consistent with the Borough Council's recent refusal of the planning application to develop the site of Victoria's nightclub to the north of the A 20 Ashford Road some 1 km to the west of the current application site. Refusal would also be consistent with the Borough Council's recent refusal of planning application 22/501002 at Ashford Road, Harrietsham, some 2km to the west. Should all three planning applications be granted, and constructed, the net result would be the extension of sporadic development severely eroding the perception and the actuality of the green, undeveloped strategic gap between the villages of Harrietsham and Lenham.
4. The A20 between Charing and Hollingbourne is currently operating at capacity with severe delays experienced at the Leeds Castle roundabouts during both the morning and evening peaks. The Parish Council would request that a cumulative transportation impact of the following developments should be prepared before any further development is considered which would access onto the A 20 in this area:
 - A. The development of the 1000 dwellings released through the Lenham Neighbourhood Plan which was "made" on 14th of July 2021 following the Examination referred to above and a successful Referendum held in the village which endorsed the proposed development strategy.
 - B. The remaining allocations released through the existing Maidstone Borough Local Plan, 2017 including the development of Tanyard Farm for approximately 150 dwellings. The Tanyard Farm site lies some 500 m to the east of the application site. The development, which is currently under construction, contributes to the cumulative visual impression of urban sprawl along the A 20 referred to above.
 - C. The large industrial estate currently being constructed at Woodcut Farm immediately adjacent to junction eight of the M 20.
 - D. The massive sandpit proposed at Mount Castle Farm some 2 km to the east of the current application site and which will take its access via the A 20.
 - E. The traffic congestion being generated post-BREXIT when operation BROCK is activated. At such times the A 20 becomes the de facto route for all traffic seeking to arrive at the Channel ports. At such times the M 20 between junctions eight and nine functions as a very large commercial vehicle car park. The net effect of this operation is to produce gridlock in surrounding villages including Lenham.
 - F. Further development within the Leeds Langley corridor which will result from the implementation of policy LPR1 in the current 2017 Maidstone Borough Local Plan as well as policy LPR SS1(7) within the Maidstone Borough Local Plan Review.
5. Southern Water Services (SWS) has known since the adoption of the Maidstone Borough Local Plan in 2017 that 1000 additional dwellings would be provided at Lenham. The Wastewater Treatment Works (WWTW) at Lenham is currently running at or beyond to its proper environmental capacity and is unable to accommodate any further flows without a significant improvement. SWS has failed to make timely provision for the necessary improvement at the Lenham wastewater treatment works within its financial planning. The earliest that the improvement needed to serve the Lenham Neighbourhood Plan 1000 dwelling sites can be constructed is following the

implementation of the SWS financial plan for 2025. This constraint, which should result on an embargo against the grant of any significant residential planning permissions, applies irrespective of the current embargo as a result of the nutrient neutrality issue.

6. In its evidence to the current Maidstone Borough Local Plan Review (ED 31) the Borough Council has put back the implementation of the Lenham in Neighbourhood Plan 1000 dwellings sites to post 2031 in its Borough-wide housing trajectory. The reason for this delay is because the Borough Council wishes to secure an enhanced wastewater treatment works at Lenham to serve its own project for 5000 additional dwellings and 5000 additional jobs at Lenham Heath in addition to the 1000 additional dwellings arising from Lenham Neighbourhood Plan. There should therefore be an embargo on the release of any further residential development sites at Lenham until such time as this issue of capacity at Lenham wastewater treatment works can be resolved. The outfall from the wastewater treatment works is to Upper Stour River which has a very low rate of flow. There is no certainty that ANY additional wastewater treatment capacity can be accommodated at Lenham wastewater treatment works because of the limitation imposed by the Environment Agency regarding the quality of the effluent which can be discharged into Upper Stour River. There is no certainty that the Environment Agency will grant the necessary discharge permits into the Upper Stour because of the low flow and the water quality issue.
7. For the above reasons the application is contrary to well-established policies contained within the National Planning Policy Framework, the Maidstone Borough local plan, its emerging replacement, and the Lenham Neighbourhood Plan all of which aim to prevent intrusive, unsustainable development in the countryside. Lenham Parish Council would therefore respectfully request that this application be refused and that the Borough Council maintain the consistent application of policies which are aimed at preventing sporadic, unplanned, urbanising development within the countryside and along the A 20 arterial road, which forms the southern boundary to the AONB.

Appendix 3

LPC response to 22/504468/FULL - Len Valley Practice 1 Groom Way Lenham Maidstone Kent ME17 2QQ

Obviously the Parish Council welcomes the news that the Medical Centre is to be expanded to accommodate the increasing population of the Village created by the extra 1500 houses currently being built and to be built up to 2031. This number of course only includes that of Lenham and not the substantial housing increase also being sought for Harrietsham which is also covered by this practice.

However that LPC objects strongly to the proposals because of the wholly inadequate parking arrangements both currently and proposed for the customers (clients) of the practice.

We would ask that if the Planning Officer is minded to approve the application that it is called into committee. There seems to be a basic misunderstanding, this is not a normal GP surgery it is a Medical Centre with some 6 GP's, a minor operation capability, practice nurses and a busy dispensary covering all patients living more than a mile from the Medical Centre. (This includes all of Harrietsham as well as rural patients within something like a 3 to 4 mile radius.)

For patients we are currently aware of 2 disabled spaces with perhaps 3 spaces on Groom Way next to the disabled spaces and 3 spaces at the Front entrance. Junior staff not allocated one of the 12 staff car park spaces currently park on Groom way reducing this to single track and using up potential car parking for patients.

If it were not for the unofficial generosity of the Community Centre allowing parking on their land when they are not hosting large e.g. NHS or KCC events there would be permanent chaos around the surgery.

It should be noted that with the “temporary” closure of the Harrietsham surgery the vehicle situation has become much worse, especially now that Harrietsham residents must now also come to the Lenham Medical centre Pharmacy to fill out their prescriptions.

A recent extreme example of the farcical chaos caused by lack of parking was the arrangement to vaccinate the elderly and those at risk with the Covid booster . The Community Centre car parking was swamped – a risk assessment by the Community Centre calculated that some **100 cars per hour** were attempting to arrive and depart during the day. In this case patients were being called in from about a 7 mile radial arc including Headcorn to the South. All this traffic volume with 8 nominal parking spaces available meant that the surrounding Roads including the bus route and Village Square were completely at a standstill.

What is needed is a complete re-plan of the entire Complex to see where the circulation can be improved and more car parking provided. Obviously the Medical Centre Complex currently fails to work, given that the catchment circle westwards is as far as Ulcombe and Hollingbourne as well as all the interspersed Hamlets with no-where near enough car parking space. With such a large catchment, it is simply not good enough to say that residents from the village should walk to the Medical Centre, especially when they may be quite ill.

We believe the only way to achieve the requisite additional parking is to request a revision to the planning application drawings. A condition can be then be imposed so that the new additional spaces are provided and remain available and open at all times that the extended surgery is open and in use.

We realize that this is contrary to the pre- app comments by the Planning Officer in this regard.

Finally in conclusion can we make a pragmatic comment – rather than providing bicycle enclosures which will never be used, would it not be better to provide enclosures (perhaps with recharging facilities) for mobility scooters for the elderly population of the Village who live close enough not to need cars.

Appendix 4

Lenham Parish Council objects to this application 22/504669/FULL and is in support of comments from the near neighbours that this proposed development is too dense and not in keeping with the other properties in the Hamlet.

The access to and from the site will increase the dangerous nature this particular part of the Headcorn Road. The site is situated on the narrowest part of the single track road (at this point) and on a blind bend with no footpath.

The road which is well used by cars, vans and HGV's is used as a rat run between the A20 at Lenham and Headcorn. Parish Council traffic monitoring apparatus records virtually 2000 vehicles per day approaching Platts Heath from Lenham some still travelling at up to 75mph just within the 30mph limit.

It is particularly busy on school days with parents dropping off and collecting children from the school.

The location is totally unsustainable with no facilities whatever in Platts Heath other than the small Primary School.

It should be noted that the site is not part of the approved Lenham Neighbourhood Plan (made on 14th July 2021) which details the siting of some 1500 houses to be built during the period 2017 to 2031 as required by the borough council. We would ask that the following points are taken into account in this regard.

1. The site is outside of any village settlement as defined on both the policies map of the adopted Maidstone Borough Local Plan (MBLP) and the made Lenham Neighbourhood Plan LNP). As such the site forms part of the open countryside. No specific landscape designations apply.
2. Policy SS 1 of the adopted Maidstone Borough Local Plan states that the Maidstone urban area will be the principal focus for development with the secondary focus being rural service centres. The policy allows for some development within the larger villages .Residential development should not be permitted at locations such as the application site which fall within the hamlets and the defined countryside.
3. The Lenham Neighbourhood Plan (LNP)was made on 14th of July 2021 and thus ,together with the Maidstone Borough Local Plan ,forms the development plan so far as the application is concerned.
- 4.LNP contains countryside protection policy CP1. Outside of the defined settlement boundary for Lenham village proposals for development within the countryside, such as the application site ,are to be assessed in terms of five criteria. Development proposals should seek to protect the rural environment of the Parish such that there are no adverse impacts on the character of the countryside. Proposals which fail to demonstrate that any harmful environmental impacts can be mitigated will not be supported. The Parish Council considers that the application proposals constitute significant overdevelopment of the site causing a harmful impact on the rural setting of the hamlet. The application is contrary to policy CP 1 as well as to the policies for the protection of the countryside contained in Maidstone Borough Local Plan.
5. Paragraph 79 of the NPPF states that in order to promote sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify the opportunities for villages to grow and thrive especially where this will support local services. Lenham Parish Council has considered this a policy and concludes that there are no existing local services within the hamlet of Platts Heath, other than the primary school, which could be supported by additional housing. The Neighbourhood Plan has made full provision for housing within the expanded village of Lenham in order to support local services at that location. Paragraph 80 of NPPF states that development of isolated homes in the countryside should be avoided unless certain considerations apply. The Parish Council considers that none of the circumstances of paragraph 80 apply to the current planning application and therefore the planning application is contrary to the NPPF at both paragraph 79 and at paragraph 80.
6. In the section headed Planning Policy Context, the planning statement submitted with the application makes reference to an earlier appeal decision on another site at Daveila, 3 Headcorn Road which lies close to the edge of the hamlet and to the south-east of the application site. In dismissing that appeal (reference APP/U2235/W/19/3228680, dated 9th August 2019) the Inspector, at paragraph 6, concluded that the site then proposed would not provide a suitable location for further housing development with regard to the character and appearance of the area. Lenham Parish Council considers that the same considerations should apply to the current application site .The housing proposed is not suitable having regard to the rural character and appearance of Platts Heath. At paragraph 10 of the Daveila appeal decision the Inspector concluded that the housing development then proposed would conflict with policy SS1 in MBLP .That policy states that protection should be given to the rural character of the borough. The Inspector also found conflict with the NPPF in this regard.
7. At paragraph 8 of the 2019 Daveila appeal decision the inspector considered the environmental harm caused by reliance on the private car and concluded that, because only one small two bedroom dwelling was propose , such harm was likely to be limited such that planning refusal on that ground alone would not be justified.
8. Lenham Parish Council would wish to emphasise that the above conclusion , which only applied to the provision of one small two bedroom bungalow, has in any event,

been rendered out-of-date by the making of Lenham neighbourhood plan on 14th of July 2021. LNP now includes policy CP1 which provides additional development plan protection to rural hamlets such as Platts Heath.

9. LNP was taken into account in another appeal decision (reference APP/U 2235/W/20/3254230 dated 25th of June 2021) against the refusal of 15 dwellings adjacent to the rural hamlet of Sandway in close proximity to the current application site. The Inspector, at paragraph 3, noted that as the neighbourhood plan had passed its referendum and was due to be made in July 2021. LNP therefore formed part of the development plan and significant weight could be afforded to it.

10. At paragraph 14 the inspector considered the isolation of the Sandway appeal site from services which are provided in the nearby village of Lenham. He considered that walking along the rural roads was fraught with dangers, with passing traffic travelling at speed. The Parish Council considers similar considerations apply to the current application site proposal, which would be served almost entirely by the private motor vehicle. At paragraph 15 the Inspector at the Sandway appeal concluded that it is highly probable that the private car would be required for every journey into and out of that site to access services as shopping, education, medical services, employment, recreation and entertainment. The Parish Council considers that the same conclusions can be drawn in relation to the current application site such that the location is wholly unsustainable and contrary to the provisions of the NPPF. The Inspector at the Sandway appeal, at paragraph 17, concluded that the site was located in a rural location and should not be used for housing development when it was not well served by sustainable transport options.

11. Paragraph 112 (a) of the NPPF states that applications for development should facilitate access to high quality public transport services and appropriate facilities that encourage public transport use. Paragraph 112 (c) of the NPPF states that applications for development should create places that are safe secure and attractive and which minimise the scope for conflicts between pedestrian cyclists and vehicles. The application site is located outside of any settlement boundary, the nearest being Lenham village itself. The application site is served by inappropriate rural roads which have no footways. There is no public transport link between the hamlet of Platts Heath and the village of Lenham. The proposal would not support the sustainable transport objectives of current policy guidance. The application is therefore contrary to the provisions of both the development plan and the NPPF.

12. The application relies on the provision of a package treatment plant (PTP) to provide foul drainage to all seven dwellings. The reason for this is in an attempt to circumvent the current embargo on new dwellings which would drain into Lenham wastewater treatment works because of the likely significant adverse effects on the Stodmarsh designated sites.

13. The Parish Council is concerned at this proposal. The Parish Council would wish for any such PTP only to be provided to the standards enforced by the Environment Agency and Natural England. The Parish Council is concerned that there will not be adequate human resources to monitor and enforce the strict environmental standards which would be required if a multiplicity of such diverse package treatment plants are to be provided across numerous locations within the Parish. The Parish Council considers the planning application to be contrary to the NPPF paragraph 185 in this regard because of the likely effect, including cumulative effects, of pollution on the natural environment. The Parish Council would support Southern Water Services in its plans to enhance Lenham wastewater treatment works and would, in fact, encourage SWS to make timely provision for such enhancement.

14. The Parish Council considers the application site to be within the countryside as defined within the development plan. Residential development in such rural areas is contrary to the provisions of the development plan policies aimed at preventing unsustainable development in unsuitable rural locations. As well as being unacceptable in principle, the proposal is a significant overdevelopment of the site which would cause severe detriment to the rural character of the hamlet. The Parish Council respectfully requests that the Borough Council maintains a consistent application of its rural protection policies, such as that supported at the June 2021 Sandway appeal decision, and that it refuses to grant planning permission to the current planning application.