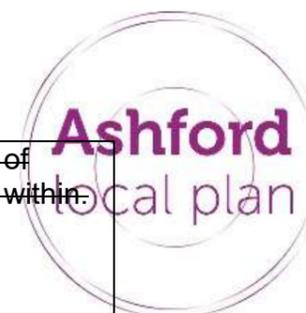




The table below sets out the Additional Modifications (AM) proposed to the submission Local Plan. AM are factual updates which do not relate to soundness issues and **ARE NOT OPEN FOR PUBLIC CONSULTATION**, however have been provided for completeness.

Explanation of the change is provided in italics. Proposed changes to text are expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text. The chapter, paragraph numbering and Policy references refer to the Submission version of the Local Plan 2030 and the changes are in plan order.

LOCAL PLAN SECTION	CHANGE DETAIL
<p>Chapter 2 Introduction – Working in Partnership</p>	<p><i>Add a new paragraph after 2.24:</i></p> <p><u>2.24.1 The County Council is also the Minerals and Waste Local Planning Authority. The adopted Minerals and Waste Local Plan includes areas identified for minerals extraction and waste disposal in the county and also identifies Minerals Safeguarding Areas (MSAs) where economically viable minerals deposits may be found. Applicants for non-minerals development should have regard to the presence of MSAs when preparing planning applications and seek to address any issues with the County Council in accordance with the relevant policies of the Minerals and Waste Local Plan and the associated Minerals Safeguarding SPD. This will be a material consideration for the Borough Council in its determination of planning applications for non-minerals development.</u></p>
<p>Policy S14 – Park Farm South East</p>	<p><i>Minor amendments to the wording of paragraph 4.147 are agreed as follows:</i></p> <p>The site is located adjacent to the new residential development known as Bridgefield. The site is currently in agricultural use. Finn Farm Road–Brockman’s Lane forms the western and southern boundary of the site, Finn Farm Road the <u>northern western</u> boundary of the site and it also adjoins the Ashford to Hastings railway line. Directly to the west is a bridge that crosses the railway line and the A2070 meeting at a three-way traffic tight controlled junction joining Finn Farm Road, Brockman’s Lane and Cheeseman’s Green Lane. The north and north western boundary of the site is formed by Cheeseman’s Green Lane which directly adjoins the existing development at Bridgefield.</p>
<p>Policy S23 – Henwood Industrial Estate</p>	<p><i>Amend Para 4.259 as follows:</i></p> <p>Minimum rather than maximum parking standards will be applied <u>Parking should be provided in accordance with policy TRA3 (b) to ensure new development does not compound existing inappropriate parking in residential streets. Where development necessitates highway and transport improvements, these will need to be agreed by KCC as part of the planning application process and may need to be wholly or partially funded by the developer.</u></p>
<p>Exclusive Home Sites Introduction, Page 167</p>	<p><i>Amend section as follows:</i></p> <p>Exclusive <u>individually designed</u> home sites</p> <p>Following the NPPF guidance which requires LPAs to promote a wide choice of quality housing, it is part of the vision of this Local Plan to provide a full range of housing that meets a wide variety of needs and choice of home for all residents. The opportunity for local need, affordable and starter housing for those not yet on the property ladder will be achieved through policies HOU1 and HOU2, and general market housing of mixed sizes and varying locations will be met through the wide range of site allocations within this plan.</p> <p>However, there is also a need to provide opportunities for delivering housing which is of an “exclusive” nature, at the top end of the housing market, and will cater for those people who may wish to design their own larger properties. <u>Typically these are individually designed, extremely high quality buildings that exhibit the highest standards in architecture and design</u></p> <p>Although the NPPF directs that “isolated” dwellings in the countryside should be avoided, it also allows for special circumstances. Paragraph 55 directs that where the design of a dwelling is of “exceptional quality” or “innovative in nature” it is considered states that such a design should:</p> <p>Be truly outstanding or innovative, helping to raise standards of design more generally in rural areas</p> <p>Reflect the highest standards in architecture</p> <p>Significantly enhance its immediate setting; and</p> <p>Be sensitive to the defining characteristics of the local area</p> <p>To meet the requirements of the NPPF that all development should be sustainable, the Council has assessed sites on the edges of settlement confines across the borough that would not be suitable for general market housing due to the location or other constraints, but could be appropriate for this type of extremely low density</p>



	<p>“exclusive” housing. This has resulted in two sites that are considered appropriate for allocation for this exceptional use, which can accommodate a small number of “exclusive high quality designed properties and which would not be detrimental to the setting and character of the countryside and the local area they are situated within. Two sites are identified for this particular type of use and the individual and specific design requirements for each site are indicated in each policy.</p>
Policy S46 – Chart Rd	<p><i>Amend paragraph 4.429 as follows:</i></p> <p>4.429 Development of this site presents an opportunity to incorporate a sustainable drainage system that would contribute to managing surface water for the benefit of flood risk, water quality, biodiversity and amenity. This site has a sensitive groundwater setting and significant area of brownfield land. Contamination assessments will need to be carried out and drainage schemes will need to be sympathetic to the results to ensure no future risk to groundwater. A small part of this site falls within an area of Groundwater Vulnerability and therefore Policy ENV8 requirements will apply. In addition, there is potential for land contamination due to the site location and former land use and appropriate surveys should be undertaken.</p>
Policy S62 – Appledore Road, Woodchurch	<p><i>Amend Paragraph 4.540 as follows:</i></p> <p>4.540 At over 1.7 <u>2</u> hectares in size, development of this site will provide around 30 dwellings, including a mix and range of housing in accordance with policy HOU18. Development would be of low density (under 20 <u>15</u>dph), which reflects the location and adjacent countryside setting.</p>
Policy HOU1 – Affordable Housing	<p><i>Amend paragraph 5.4 and 5.5 as follows:</i></p> <p>5.4 Affordable Housing for the purposes of this policy includes affordable/social rent, and affordable home ownership products which includes starter homes, rent to buy and shared ownership products, as set out in the Housing White Paper 2017.</p> <p>5.5 The provision of affordable home ownership products set out in this policy has been set in line with the government’s current position as set out in the Housing White Paper in that all sites of 10 units or more (or 0.5 ha or more in size) will provide for a minimum of 10% of such dwellings. Within this requirement, The policy also seeks a minimum requirement for shared ownership and <u>affordable/social rent</u> rent to buy products specifically, reflecting the requirement to meet local needs in the borough, balanced with what development can afford to deliver.</p>
Policy HOU11 – Houses in Multiple Occupation	<p><i>Insert following supporting text paragraphs after paragraph 5.91:</i></p> <p><u>Consideration of the impact of traffic in relation to HMOs should be qualitatively different from that for residential (C3) uses outlined in Policy TRA3a. HMOs can make efficient use of existing housing stock, thereby contributing to sustainable development, but are seldom constructed as new builds, and therefore it would not be effective to establish a one size fits all approach establishing specific parking standards. Furthermore, since HMOs are frequently situated within walking distance of local amenities and transport links, often a lower level of parking provision would in theory be appropriate than for suburban or rural properties.</u></p> <p><u>The main issues when HMOs do not provide on-plot parking is the knock on impact on local amenity and on highway safety that can result. Applications for HMOs should consider the likely impact of non-provision of on-site parking on highway safety, including visibility, potential for obstruction, increased congestion and, if relevant, economic impact on local business. These should be considered on a local case-by-case basis, and any design and access statement should outline how these issues have been considered and, where necessary, mitigated. In certain cases, for example in town centres with a range of transport options, it is likely that on-site parking could be superfluous and will not be required.</u></p>
Policy HOU12 – Residential Space Standards (Internal)	<p><i>Amend supporting text as follows:</i></p> <p>5.97 <u>In line with the provisions set out in policy IMP2 of this Local Plan, the Council accepts that it may, on occasion, It may, very occasionally, be necessary to make an exception to development (as a whole or in part) meeting the national minimum standards. Such exceptions could relate to issues of viability or the feasibility and/or practicality of implementing the standards.</u> for example, in the case of the conversion of historic buildings where it may be desirable to maintain important and distinctive</p>



	<p>characteristics that contribute to the character of the building. However These proposals will need to provide without strong justification as to why the standards are not able to be met. proposals which do not comply with the standards are unlikely to be acceptable</p>
Section B - Introduction to Employment and the local economy	<p><i>Amend paragraph 5.128 as follows:</i></p> <p>Providing for employment and the local economy is a critical part of the overall strategy set out in this Local Plan. The strategic approach to employment delivery has been set out in policies SP3 and SP4. The following section support the approach and includes detailed policies for the consideration of proposals for new <u>B class</u> employment uses in the towns, villages and rural areas, as well as those which result in the loss of employment premises.</p>
Policy EMP4 – Conversions of rural buildings to non-residential uses	<p><i>Amend paragraph 5.154 as follows and insert additional paragraph following 5.5154:</i></p> <p>5.154 When planning permission is granted for a conversion, the Council will also usually <u>may</u> remove permitted development rights to extend the building or erect additional buildings within its curtilage. Without this control, the architectural and historic integrity of converted buildings and the rural character of the countryside could be damaged.</p> <p><u>For the avoidance of doubt, proposals which are supported by Policy EMP4 are exempt from the requirements of Policy EMP9.</u></p>
Policy EMP5 – New employment premises in the countryside	<p><i>Amend para 5.155 as follows:</i></p> <p>5.155 New employment sites (i.e. not conversions) in the countryside (<u>the areas of the Borough outside of the Ashford urban area and those villages listed under policy HOU3a</u>) will not be permitted unless exceptional circumstances can be demonstrated to set aside the normal presumption against such developments. Such circumstances may include the functional need for a countryside location, such as the processing of local; agricultural products. New employment sites in the countryside will need to have regard to the need to protect countryside sites with specific landscape, biodiversity or historic qualities.</p>
EMP10 – Local and village centres	<p><i>Insert additional paragraph following 5.208:</i></p> <p><u>For the avoidance of doubt, proposals for additional shopping and service provision which are supported by Policy EMP10 are exempt from the requirements of Policy EMP9</u></p> <p><i>Amend policy title as follows:</i></p> <p>Policy EMP10 - Local <u>Centres</u> and Villages <u>Centres</u></p>
TRA1 – Strategic Transport Schemes	<p><i>Amend supporting text to read:</i></p> <p>5.227 This approach shall also take account of the practical likelihood of development being able to be occupied prior to the completion of Junction 10a given the presence of other infrastructure constraints, market conditions and development lead-in times in order that any available capacity is utilised by developers most able to construct and occupy. The Council will impose appropriate Grampian-style conditions on grants of planning permission for relevant sites to ensure development occupations is controlled prior to the <u>opening to traffic</u> completion of Junction 10a.</p> <p>Pound Lane Link Road</p> <p>5.235 The broad location of the Pound Lane Link Road is shown on the Policies Map as a new strategic, single-carriageway link road from Pound Lane to the roundabout at the entrance to the Park Farm development. The creation of this link road is critical to <u>may be needed to facilitate</u> the full delivery of the proposed allocation at Court Lodge Farm (policy S3) but will <u>would</u> also provide the opportunity for an additional strategic vehicular link for traffic from the Chilmington urban extension (to the west) to the A2070 trunk road and M20 Junction 10/10a.</p>



	<p>5.236 The delivery of this link road will <u>would</u> provide relief from existing and future traffic generation from the Chilmington development on parts of the rural road network (notably Magpie Hall Road) and existing local residential estate roads in the Knights Park and Brisley Farm areas.</p> <p>5.237 The proposed Link road crosses the functional floodplain in parts and full liaison with the Environment Agency will be needed to ensure that full mitigation is delivered as part of the scheme design. The Council owns land in this area and it would be physically feasible to construct the link road on land within the Council's ownership, although this would result in a sub-optimal scheme in terms of highway design and impact on neighbouring residents. Consequently, third party land is ideally required to deliver this scheme recognising that such land has minimal development value given its floodplain status.</p> <p>5.238 The Council, in association with KCC, will <u>would</u> seek to acquire the necessary rights to deliver the preferred route of the Link road although the option to use Compulsory Purchase powers if necessary will <u>could</u> be entertained. As yet, there is not a fully designed and costed scheme but in principle it is proposed to fund the delivery of the scheme through a combination of site specific Section 106 or 278 Agreements and other public sector funding sources.</p>
<p>TRA9 – Planning For HGV movement</p>	<p><i>Amend supporting text as follows (Separate out para 5.281, add new paragraph within and remove bullets):</i></p> <p>5.283 Otherwise, proposals that generate significant HGV parking shall be expected to take into account the location, the nature of the proposed use and the impact on the local road network.</p> <p><u>Existing Vehicle Standards previously produced by Kent County Council and utilised in Ashford Borough have proven themselves effective over a number of years in managing parking provision related to different use classes. Those standards are brought forward in this plan for general parking provision in Policy TRA3b, while provision specifically for those use classes requiring particular accommodation for HGV parking provides the focus of this Policy TRA9.</u></p> <p>Proposals will need to be supported by evidence which can demonstrate that the scheme provides HGV parking to at least meet the number of spaces required as established through the <u>longstanding guidance Kent Vehicle Standards SPG (produced by KCC) and reflected in the policy TRA9 below</u> or, if greater, the latest physical requirements to accommodate HGVs as average sizes increase, with sufficient spacing for parking, manoeuvring and turning. These should be provided on-site or in any communal HGV parking area. Parking on the public highway will not be regarded as a means of meeting HGV parking standards.</p> <p><u>To this end, it is expected that only certain classes of development will give rise to the need for HGV parking, and the provision required for a development is usually based on the floor area, the number of staff, the seating capacity or the number of visitors. However, employment-generating development will still be expected to provide for deliveries. Unless otherwise stated, the floor space to be used in applying the standards is the gross floor area based on the external measurement over each floor of the building with corridors, stairwells, etc. included in the measurement.</u></p> <p><u>It is important that the size of the site is large enough to cater for the HGV movements envisaged, including space for loading and unloading and adequate turning circles on site so that the public highway is not needed to serve these functions as this can lead to unnecessary congestion and safety issues.</u></p> <p>Furthermore, movement and operations of any HGVs is <u>should be</u> limited to suitable times <u>so as not to negatively impact the amenity of residents along distribution networks.</u></p>
<p>Policy ENV12 – Air Quality</p>	<p><i>Amend paragraph 5.389 as follows:</i></p> <p>5.389 The National Planning Policy Framework (NPPF) states that the planning system should contribute to and <u>wherever possible</u> enhance the natural and local environment. It should prevent both new and existing development from contributing to or being put at unacceptable risk of pollution, including air pollution. Consideration must be given to the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual <u>development proposals sites in on protected and important habitats and local areas.</u></p>
<p>COM3 - Allotments</p>	<p><i>Amend paragraphs 5.448 – 4.451 as follows:</i></p> <p>5.448 Allotment gardening is an increasingly popular leisure activity and allotments themselves are an important feature in both urban and rural communities, providing wildlife and species rich habitats and attractive areas of green space in otherwise residential areas.</p>



	<p>5.449 Allotments also make an important contribution to the planning and promotion of healthy communities, with the benefits of such safe, attractive and functional green areas including not only the direct provision of places for physical activity, but also the psychological and social benefits that arise from engaging with nature and opportunities for informal social interaction. <u>Allotments are therefore considered an important facility that meets the needs of the community and therefore form part of the requirements set out in Policy COM1.</u></p> <p><i>5.449.1</i> Given their role in the well-being of communities and the difficulties in finding new open spaces within existing built up areas, the development of existing allotment land will only be supported in exceptional circumstances.</p> <p>5.450 Demand for allotments owned by the Council is kept under review, with additional provision being made where necessary. Over the lifetime of this Local Plan the need for additional allotment provision is 3.36ha <u>3.4ha</u>. <u>How this provision will be delivered shall be set out in an appropriate strategy that will be produced by the Council in due course, the requirement for which is the strategy for which will be identified in the emerging Council's Open Space Strategy (2018).</u></p> <p><u>5.450a None of the site allocations in this Local Plan require new allotments to be delivered on-site as none exceed the threshold identified in the Public Green Spaces and Water Environment SPD for such provision. However, proposals for new allotments will normally be supported in principle, particularly where large scale development is proposed.</u></p> <p>5.451 <u>Where new allotment provision is proposed as part of an application it should be provided in a way that is well related to residential properties, sit sympathetically in the landscape and enjoy suitable vehicular access arrangements. In addition, the Public Green Spaces and Water Environment SPD establishes a number of design principles relating to allotment provision which should also be applied to all new allotment sites coming forward during the lifetime of this Plan.</u></p>																																							
<p>COM4 – Cemetery Provision</p>	<p><i>Paragraph 5.452 be amended as follows.</i></p> <p>The yearly mortality rate in this Borough has remained broadly constant over the last ten years despite an increase in population. This is due to people living longer, however a continued increase in life spans is unlikely over the medium term and so it has been assumed that the future mortality rate will increase in line with Ashford's population growth, which grew at a rate of 1.2% per annum between 2001 and 2011. Based on an average annual year-on-year future population increase of 1.2% per annum burial space within the Council's Cemeteries is likely to be exhausted in the early 2020s. <u>The Council's current assessment is that over the Plan period to 2030 there is sufficient capacity at its cemeteries in Ashford, Bybrook and Tenterden.</u></p>																																							
<p>Appendix 3 – List of Housing Site allocations</p>	<p><i>Amend list of housing site policies as follows:</i></p> <table border="1" data-bbox="412 1320 1567 1925"> <thead> <tr> <th><u>Policy No.</u></th> <th><u>Site Name</u></th> <th><u>Number of units</u></th> </tr> </thead> <tbody> <tr> <td>S1</td> <td>Commercial Quarter, Ashford Town Centre</td> <td>159</td> </tr> <tr> <td>S2</td> <td>Land NE of Willesborough Road, Kennington</td> <td>700</td> </tr> <tr> <td>S3</td> <td>Court Lodge, Kingsnorth</td> <td>950</td> </tr> <tr> <td>S4</td> <td>Land north of Steeds Lane and Magpie Hall Road, Kingsnorth</td> <td>400</td> </tr> <tr> <td>S5</td> <td>Land South of Pound Lane, Kingsnorth</td> <td>150</td> </tr> <tr> <td>S6 & S7</td> <td>Former Klondyke & Newtown Works Phase 2</td> <td>350</td> </tr> <tr> <td>S7</td> <td><u>Former Klondyke</u></td> <td><u>90</u></td> </tr> <tr> <td>S8</td> <td>Lower Queens Road, Ashford</td> <td>40</td> </tr> <tr> <td>S9</td> <td>Kennard Way - Henwood</td> <td>25</td> </tr> <tr> <td>S10</td> <td>Gasworks Lane, Ashford</td> <td>150</td> </tr> <tr> <td>S11</td> <td>Leacon Road, Ashford</td> <td>100</td> </tr> <tr> <td>S12</td> <td>K College, Jemmett Road</td> <td>160</td> </tr> </tbody> </table>	<u>Policy No.</u>	<u>Site Name</u>	<u>Number of units</u>	S1	Commercial Quarter, Ashford Town Centre	159	S2	Land NE of Willesborough Road, Kennington	700	S3	Court Lodge, Kingsnorth	950	S4	Land north of Steeds Lane and Magpie Hall Road, Kingsnorth	400	S5	Land South of Pound Lane, Kingsnorth	150	S6 & S7	Former Klondyke & Newtown Works Phase 2	350	S7	<u>Former Klondyke</u>	<u>90</u>	S8	Lower Queens Road, Ashford	40	S9	Kennard Way - Henwood	25	S10	Gasworks Lane, Ashford	150	S11	Leacon Road, Ashford	100	S12	K College, Jemmett Road	160
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Ashford Borough Council –Schedule Additional Modifications – SEPTEMBER 2018

Explanation of the modification is provided in italics. Changes to text are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text. **Policy wording is shown in bold.**



S13	Former Ashford South Primary School	110
S14	Park Farm South East	325
S15	Finberry North West	300
S16	Waterbrook	350
S17	Willesborough Lees	200 <u>220</u>
S19	Conningbrook Residential Phase 2	170
S20	Eureka Park	375
S24	Tenterden Southern Extension Phase B	225
S26	The Street, Appledore	20
S27	North Street, Biddenden	45
S28	Northdown Service Station, Maidstone Road, Charing	20
S29	Land South of Arthur Baker Playing Field, Charing	35
S30	Land on New Road, Egerton	15
S31	Land north of St. Mary's Close, Hamstreet	80
S32	Land at Parker Farm, Hamstreet	10
S33	Land at Hope House, High Halden	35
S34	Land East of Coach Drive, Hothfield	40
S35	Land adjacent to the Village Hall, Mersham	10
S36	Land rear of Kings Head PH, Shadoxhurst	25 <u>19</u>
S37	Land adjacent to Village Hall, Smarden	25 <u>50</u>
S38	Land South of Church Road, Smeeth	35
S40	Land at Front Rd, Woodchurch	8
S41	<u>Chilham, Mulberry Hill</u>	<u>2</u>
S42	<u>St. Michaels, Beechwood Farm</u>	<u>3</u>
S45	Land South of Brockmans Lane, Bridgefield	100
S46	Chart Road, Ashford	25
S47	Land east of Hothfield Mill, A20	75
S48	Rear of Holiday Inn, A20	150
S49	Land north of Tutt Hill, A20	75
S51	Land north of Church View, Aldington	40 <u>6</u>
S52	Land South of Goldwell Court, Aldington	20 <u>12</u>
S53	Nats Lane, Brook	40
S54	Land at Clockhouse, Challock	15
S55	Land Adjacent to Poppyfields, Charing	180
S56	Branch Road, Chilham	10
S57	Warehorne Road, Hamstreet	50
S58	Stevenson Bros – A28, High Halden	50
S59	Land at Old Rectory Close, Mersham	15 <u>8</u>
S60	Pope House Farm, Tenterden (St. Michael's)/ High Halden	50
S61	Land between Lloyds Green and Jubilee Fields, Wittersham	40
S62	Land off Appledore Road, Woodchurch	30
	TOTAL*	6,567*



	<p>*This does not includes assumed contribution from Neighbourhood Plans, or extant previous allocations/permissions as detailed in the Housing Trajectory.</p>
<p>Appendix 7 – Local Plan Policies in a Neighbourhood Plan context</p>	<p><i>Add new Appendix 7:</i></p> <p><u>How Local Plan Policies should be applied in a Neighbourhood Plan context.</u></p> <p><u>With regards to the topic based policies, the assessment showed that all of them directly related to at least one of the strategic policies (SP1 – SP7). It therefore follows that they should be viewed as the tools to deliver the strategic objectives established by those policies. However, some policies only apply in certain geographical locations within the borough. They should therefore not be considered ‘strategic’ for Neighbourhood Plans that fall outside of their scope. This applies to the following policies: -</u></p> <ul style="list-style-type: none"> • <u>SP5 - Ashford Town Centre</u> • <u>HOU7 - Replacement dwellings in the countryside</u> • <u>EMP3 - Extensions to employment premises in the rural area</u> • <u>EMP4 - Conversions of rural buildings to non-residential uses</u> • <u>EMP5 - New employment premises in the countryside</u> • <u>EMP7 - Primary & Secondary Shopping Frontages in Ashford Town Centre</u> • <u>EMP8 - Primary Shopping Frontage in Tenterden Town Centre</u> • <u>TRA1 - Strategic Transport Schemes</u> • <u>TRA2 - Strategic Public Parking Facilities</u> • <u>ENV2 - The Ashford Green Corridor</u> • <u>ENV3b - Landscape Character and Design in the AONBs</u> • <u>ENV5 - Protecting important rural features</u> <p><u>Site allocations should be considered strategic in most instances. However, the Council does accept that some smaller allocated sites may not be ‘central’ to achieving the vision and aspirations of the Local Plan which is ‘test’ 5 in paragraph 076 of the PPG. Within this context, the Council considers that the following site allocations should be viewed as ‘non-strategic’ for the purpose of Neighbourhood Planning:</u></p> <ul style="list-style-type: none"> • <u>S30 – Land on New Road, Egerton – 15 dwellings</u> • <u>S32 (HAM2) – Land at Parker Farm, Hamstreet – 10 dwellings</u> • <u>S35 – Land adjacent to Village Hall, Mersham – 10 dwellings</u> • <u>S40 (WOOD1) – Land at Front Road, Woodchurch – 8 dwellings</u> • <u>S41 – Mulberry Hill, Old Wives Lees – 2 dwellings</u> • <u>S42 – Beechwood Farm, St Michaels – 3 dwellings</u> • <u>S51 – Land north of Church View, Aldington – 6 dwellings</u> • <u>S52 – Land south of Goldwell Manor Farm, Aldington – 12 dwellings</u> • <u>S54 – Land at Clockhouse, Challock – 15 dwellings</u> • <u>S56 – Branch Road, Chilham – 10 dwellings</u> • <u>S59 – Land at Old Rectory Close, Mersham – 8 dwellings</u> <p><u>Neighbourhood Plan groups are advised to contact the planning department to discuss the Local Plan policies in the context of their specific designated area.</u></p>