



## HEADCORN PARISH COUNCIL

The Clerk, Parish Office, Headcorn Village Hall, Church Lane

Headcorn TN27 9NR

Phone 01622 892496 Email [clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)

Robert Mellor  
c/o Louise St. John Howe  
PO Services,  
PO Box 10965,  
SUDBURY,  
Suffolk  
CO10 3BF

5th December 2016

### **Re: Maidstone Borough Council Local Plan Examination**

Dear Sir

As you will be aware Headcorn Parish Council has actively and constructively participated in Maidstone Borough Council's Local Plan Examination. This participation has included attendance at several of the sessions that you chaired, where Dr Rebecca Driver has represented the views of Headcorn, supported at each session by members of Headcorn Parish Council and Parishioners of Headcorn.

During those sessions we became increasingly concerned at the way in which the Headcorn Neighbourhood Plan (HNP) was presented by those representing MBC. Of particular concern was the repeated comment that the HNP did not allocate any development sites. We feel that this comment is misleading, and want to clarify the position of the HNP.

Certainly when we presented the first draft of the HNP to MBC it did not include any allocated sites. Instead it included a set of principles-based policies that could be used to assess potential sites as they came forward, along with policies supporting appropriate phasing to promote sustainability by ensuring that development is spread throughout the plan period, rather than being concentrated entirely in the first few years of the plan. The approach taken was supported by a housing need survey to identify the number of housing units required to meet the needs of emerging households and an explicit assessment of both sustainability considerations and the objectively assessed housing need for Headcorn, ensuring that the plan was positively prepared.

However, following MBC's comments on this initial draft, we listened to MBC's concerns regarding the lack of explicit housing site allocations in our Neighbourhood Plan and commissioned Levitt-Therivel, an independent expert in sustainability and site suitability, to



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help us assess the suitability of potential housing sites in Headcorn. The results of this site assessment exercise were used to rank sites in Headcorn from green (the most suitable) to red (not suitable). The sites that scored best from this ranking exercise were then explicitly identified as strategic housing development sites for Headcorn village in Policy HNP12 and were consulted on in the Regulation 14 and the Regulation 16 versions of the HNP.

MBC's assertion that the HNP does not allocate sites is therefore incorrect and we refer you to the HNP for confirmation that the most suitable sites for development in Headcorn have been identified on plans contained in the HNP. Indeed during the recent examination of the HNP the examiner did not make any comments regarding a lack of allocated sites in the HNP. In fact the examiner was very complimentary regarding the way in which the plan had brought the community together and how it reflected the strongest shared vision for development he had ever seen.

It is, however, true that Headcorn's Neighbourhood Plan does not allocate the same sites that have been proposed as part of Maidstone's Local Plan. In particular, it includes an additional housing allocation to the north west of the village with direct access onto the A274 (which has since been granted outline planning permission for 62 dwellings), but omits MBC's proposed housing allocations H1 (39) and the top part of H1 (37) (which corresponds to SHLAA site HO-7) because of their poor performance in the site assessment exercises produced to support both HNP and MBC's Local Plan. In the case of housing allocation H1 (39) (which is the only proposed housing allocation in Headcorn that has not yet been granted planning permission), ranking sites first using the number of red flags and then the number of red and amber flags compared to green, there are 203 sites with a combined yield of 22,140 that ranked better in MBC's Sustainability Appraisal and were not allocated in the emerging Local Plan. In the case of SHLAA site HO-7 (which is part of the proposed housing allocation H1(37) and is currently subject to a legal challenge) there are 178 sites with a combined yield of 14,683 that ranked better in MBC's Sustainability Appraisal and were not allocated in the emerging Local Plan. Therefore, there are more than sufficient sustainable sites in other parts of Maidstone Borough to make up any shortfall in MBC's objectively assessed need and five-year housing supply if these sites are dropped from the Local Plan. [Note that if instead the site ranking had been done using first the number of green compared to red and amber flags and then the number of red flags these two sites would still be in the bottom five allocated sites, with 210 unallocated sites performing better in sustainability terms than allocation H1 (39) and 208 sites performing better than the top part of housing allocation H1 (37).]

Based on objective evidence we therefore consider that the site allocations in HNP are more appropriate than the proposed allocations in Maidstone's Local Plan. They are part of a



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Neighbourhood Plan that has been positively prepared, is a true reflection of localism, keeps sustainability at its heart and clearly identifies the most suitable sites for development, supporting a sustainable increase in housing numbers that takes account of both local housing needs and migration.

As you know, Dr Rebecca Driver has presented substantial evidence during the MBC LP hearings that confirms Headcorn is not a sustainable location as defined by the NPPF and that an alternative urban-centric approach to development is needed for the Local Plan to meet the definition of economic sustainability set out in the NPPF.

We therefore urge you to find that allocations H1 (39) and H1 (37) should be dropped from Maidstone's Local Plan and that the housing target set out in Policy SP7 is adjusted to reflect this change. In addition, we consider that it is important that Maidstone's overall approach to setting policy is changed so that it is more supportive of Neighbourhood Planning in line with Localism. Without these changes we consider that Maidstone's Local Plan cannot meet the definition of soundness set out in the NPPF.

Yours faithfully

Caroline Carmichael  
Clerk