

# AMENDED AGENDA FOR PLANNING AND HEALTHIER STRONGER COMMUNITIES POLICY ADVISORY COMMITTEE MEETING

Date: Tuesday 9 July 2024  
Time: 6.30 pm  
Venue: Town Hall, High Street, Maidstone

Membership:

Councillors Barwick (Chairman), Clark, Conyard (Vice-Chairman), Forecast, Greenan, Harper, Kehily, Russell and Spooner

*The Chairman will assume that all Members will read the reports before attending the meeting. Officers are asked to assume the same when introducing reports.*

---

<b><u>AGENDA</u></b>	<b><u>Page No.</u></b>
1. Apologies for Absence	
2. Notification of Substitute Members	
3. Urgent Items	
4. Notification of Visiting Members	
5. Disclosures by Members and Officers	
6. Disclosures of Lobbying	
7. To consider whether any items should be taken in private because of the possible disclosure of exempt information	
8. Minutes of the Meeting Held on 21 May 2024	1
9. Forward Plan relating to the Committee's Terms of Reference	2 - 5
10. 4th Quarter Financial Update & Performance Monitoring Report	6 - 31
11. Headcorn Neighbourhood Plan Regulation 16	32 - 376
12. Maidstone Local Cycling & Walking Infrastructure Plan	377 - 386
13. Kent Mineral Sites Plan Regulation 18 Updated Response	387 - 407
14. Draft Statement of Common Ground with KCC Regarding Review of Kent Minerals and Waste Local Plan 2024-39	408 - 417

---

**Issued on 1 July 2024**

**Continued Over/:**



**Alison Broom, Chief Executive**

## **PART II**

**To move that the public be excluded for the items set out in Part II of the Agenda because of the likely disclosure of exempt information for the reasons specified having applied the Public Interest Test.**

### **Head of Schedule 12 A and Brief Description**

- |   |  |           |
|---|--|-----------|
| 15. Exempt Appendix 1: Draft Statement of Common Ground with KCC Regarding Review of Kent Minerals and Waste Local Plan 2024-39 | Paragraph 3 – Financial/Business Affairs | 418 - 425 |
|---|--|-----------|

### **INFORMATION FOR THE PUBLIC**

In order to make a statement in relation to an item on the agenda, please call 01622 602899 or email [committee@maidstone.gov.uk](mailto:committee@maidstone.gov.uk) by 4 p.m. one clear working day before the meeting (i.e. by 4 p.m. on 5 July 2024). You will need to tell us which agenda item you wish to speak on. If you require this information in an alternative format please contact us, call 01622 602899.

To find out more about the work of the Committee, please visit the Council's Website.

## MAIDSTONE BOROUGH COUNCIL

### PLANNING AND HEALTHIER STRONGER COMMUNITIES POLICY ADVISORY COMMITTEE

#### MINUTES OF THE MEETING HELD ON TUESDAY 21 MAY 2024

##### Attendees:

<b>Committee Members:</b>	<b>Councillors Barwick (Chairman), Clark, Conyard, Forecast, Mrs Gooch, Greenan, Jeffery, Russell and Spooner</b>
---------------------------	---

1. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Harper and Kehily.

2. NOTIFICATION OF SUBSTITUTE MEMBERS

The following Substitute Members were noted:

- Councillor Mrs Gooch for Councillor Harper
- Councillor Jeffery for Councillor Kehily

3. ELECTION OF CHAIRMAN

**RESOLVED:** That Councillor Barwick be elected as Chairman of the Committee for the Municipal Year 2024/25.

4. ELECTION OF VICE-CHAIRMAN

**RESOLVED:** That Councillor Conyard be elected as Vice-Chairman of the Committee for the Municipal Year 2024/25.

5. DURATION OF MEETING

7.50 p.m. to 7.54 p.m.







## MAIDSTONE BOROUGH COUNCIL FORWARD PLAN FOR THE FOUR MONTH PERIOD 1 JUNE 2024 TO 30 SEPTEMBER 2024

This Forward Plan sets out the details of the key and non-key decisions which the Cabinet or Cabinet Members expect to take during the next four-month period.

A Key Decision is defined as one which:

1. Results in the Council incurring expenditure, or making savings, of more than £250,000; or
2. Is significant in terms of its effects on communities living or working in an area comprising two or more Wards in the Borough

The current Cabinet Members are:

<p style="text-align: center;">2</p>  <p style="text-align: center;"><b>Councillor Stuart Jeffery</b> Leader of the Council Email <a href="mailto:stuartjeffery@maidstone.gov.uk">stuartjeffery@maidstone.gov.uk</a></p>	 <p style="text-align: center;"><b>Councillor Clive English</b> Deputy Leader and Cabinet Member for Environmental Services and Enforcement Email <a href="mailto:cliveenglish@maidstone.gov.uk">cliveenglish@maidstone.gov.uk</a></p>	 <p style="text-align: center;"><b>Councillor Kathy Cox</b> Cabinet Member for Corporate Services Email <a href="mailto:KathyCox@Maidstone.gov.uk">KathyCox@Maidstone.gov.uk</a></p>
 <p style="text-align: center;"><b>Councillor Tony Harwood</b> Cabinet Member for Planning Policy and Management Email <a href="mailto:tony.harwood36@gmail.com">tony.harwood36@gmail.com</a></p>	 <p style="text-align: center;"><b>Councillor Stephen Thompson</b> Cabinet Member for Healthier Stronger Communities Email: <a href="mailto:StephenThompson@Maidstone.gov.uk">StephenThompson@Maidstone.gov.uk</a></p>	 <p style="text-align: center;"><b>Councillor Mike Summersgill</b> Cabinet Member for Climate Transition and Nature Recovery Email <a href="mailto:MichaelSummersgill@Maidstone.gov.uk">MichaelSummersgill@Maidstone.gov.uk</a></p>



**Councillor David Naghi**

Cabinet Member for Community Cohesion  
and Safety

Email [Davidnaghi@maidstone.gov.uk](mailto:Davidnaghi@maidstone.gov.uk)



**Councillor Simon Wales**

Cabinet Member for Housing and Homelessness

Email [SimonWales@Maidstone.gov.uk](mailto:SimonWales@Maidstone.gov.uk)

Anyone wishing to make representations about any of the matters listed below may do so by contacting the relevant officer listed against each decision, within the time period indicated.

Ω

Under the Access to Information Procedure Rules set out in the Council's Constitution, a Key Decision or a Part II decision may not be taken, unless it has been published on the forward plan for 28 days or it is classified as urgent:


The law and the Council's Constitution provide for urgent key and part II decisions to be made, even though they have not been included in the Forward Plan.

Copies of the Council's constitution, forward plan, reports and decisions may be inspected at Maidstone House, King Street, Maidstone, ME15 6JQ or accessed from the [Council's website](#).

Members of the public are welcome to attend meetings of the Cabinet which are normally held at the Town Hall, High St, Maidstone, ME14 1SY. The dates and times of the meetings are published on the [Council's Website](#), or you may contact the Democratic Services Team on telephone number **01622 602899** for further details.

**Councillor Stuart Jeffery**  
**Leader of the Council**

<b>Details of the Decision to be taken</b>	<b>Decision to be taken by</b>	<b>Relevant Cabinet Member</b>	<b>Expected Date of Decision</b>	<b>Key</b>	<b>Exempt</b>	<b>Proposed Consultees / Method of Consultation</b>	<b>Documents to be considered by Decision taker</b>	<b>Representations may be made to the following officer by the date stated</b>
CIL Bidding Round 2  To review the next CIL Bidding Round (24-25)	Cabinet	Cabinet Member for Planning, Policy and Management	24 Jul 2024	Yes	No Open	Planning and Healthier Stronger Communities Policy Advisory Committee 9 Jul 24	CIL Bidding Round 2	<b>Rob Jarman, Carole Williams</b>  Head of Development Management,  Robjarman@maidstone.gov.uk, carolewilliams@maidstone.gov.uk
Draft Statement of Common Ground with KCC Regarding Review of Kent Minerals and Waste Local Plan 2024-39	Cabinet	Cabinet Member for Planning Policy and Management	24 Jul 2024	Yes	No Part exempt	Planning and Healthier Stronger Communities Policy Advisory Committee 9 Jul 24	Draft Statement of Common Ground with KCC Regarding Review of Kent Minerals and Waste Local Plan 2024-39	<b>Thom Hoang, Mark Egerton</b>  ThomHoang@Maidstone.gov.uk, markegerton@maidstone.gov.uk
Headcorn Neighbourhood Plan Regulation 16 To seek approval for Maidstone Borough Council's response to the Headcorn Neighbourhood Plan Regulation 16 consultation.	Cabinet	Cabinet Member for Planning Policy and Management	24 Jul 2024	No	No Open	Planning and Healthier Stronger Communities Policy Advisory Committee 9 Jul 2024	Headcorn Neighbourhood Plan Regulation 16	<b>Nicola Stokes, Erik Nilsen</b>  NicolaStokes@Maidstone.gov.uk, ErikNilsen@Maidstone.gov.uk

<b>Details of the Decision to be taken</b>	<b>Decision to be taken by</b>	<b>Relevant Cabinet Member</b>	<b>Expected Date of Decision</b>	<b>Key</b>	<b>Exempt</b>	<b>Proposed Consultees / Method of Consultation</b>	<b>Documents to be considered by Decision taker</b>	<b>Representations may be made to the following officer by the date stated</b>
<p>Kent Mineral Sites Plan Regulation 18 Updated Response</p> <p>Updated response to KCC's Kent Mineral Sites Plan Regulation 18</p>	Cabinet Member for Planning Policy and Management	Cabinet Member for Planning Policy and Management	24 Jul 2024	No	No Open	Planning and Healthier Stronger Communities Policy Advisory Committee 9 Jul 2024	Kent Mineral Sites Plan Regulation 18 Updated Response	<p><b>Thom Hoang, Mark Egerton</b></p> <p>ThomHoang@Maidstone.gov.uk, markegerton@maidstone.gov.uk</p>
<p>Maidstone Local Cycling &amp; Walking Infrastructure Plan</p> <p> Report requesting permission to go to consultation on the Maidstone Local Cycling &amp; Walking Infrastructure Plan.</p>	Cabinet	Cabinet Member for Planning, Policy and Management	24 Jul 2024	No	No Open	Planning and Healthier Stronger Communities Policy Advisory Committee 9 Jul 24	Maidstone Local Cycling & Walking Infrastructure Plan	<p><b>Tom Gilbert</b></p> <p>tomgilbert@maidstone.gov.uk</p>
<p>Infrastructure Funding Statement</p> <p>Statement of developer contributions collected and spent from previous financial year (23-24)</p>	Cabinet	Cabinet Member for Planning, Policy and Management	18 Sep 2024	No	No Open	Planning and Healthier Stronger Communities Policy Advisory Committee 4 Sep 24	Infrastructure Funding Statement	<p><b>Rob Jarman, Carole Williams</b></p> <p>Head of Development Management,</p> <p>Robjarman@maidstone.gov.uk, carolewilliams@maidstone.gov.uk</p>

# Agenda Item 10

## **PLANNING & HEALTHIER, STRONGER COMMUNITIES POLICY ADVISORY COMMITTEE**

**9 July 2024**

### **4<sup>th</sup> Quarter Finance Update & Performance Monitoring Report 2023/24**

<b>Timetable</b>	
<b>Meeting</b>	<b>Date</b>
Planning and Healthier Stronger Communities Policy Advisory Committee	9 July 2024
Cabinet Meeting	24 July 2024

<b>Will this be a Key Decision?</b>	No
<b>Urgency</b>	Not Applicable
<b>Final Decision-Maker</b>	Cabinet
<b>Lead Head of Service</b>	Mark Green, Director of Finance, Resources & Business Improvement
<b>Lead Officer and Report Author</b>	Paul Holland, Senior Finance Manager Carly Benville, Senior Information Analyst
<b>Classification</b>	Public
<b>Wards affected</b>	All

#### **Executive Summary**

This report sets out the 2023/24 financial and performance position for the services reporting into the Planning and Healthier Stronger Communities Policy Advisory Committee (PHSC PAC) as at 31<sup>st</sup> March 2024 (Quarter 4). The primary focus is on:

- The 2023/24 Revenue and Capital budgets; and
- The 2023/24 Key Performance Indicators (KPIs) that relate to the delivery of the Strategic Plan 2019-2045.

The combined reporting of the financial and performance position enables the Committee to consider and comment on the issues raised and actions being taken to address both budget pressures and performance issues in their proper context, reflecting the fact that the financial and performance-related fortunes of the Council are inextricably linked.



Quarterly monitoring reports for the first three quarters of 2023/24 were prepared for the four Policy Advisory Committees that were in place at the time. The reduction in the number of Policy Advisory Committees in May 2024 from four to three and the new allocation of responsibilities between Committees is reflected in this report, such that performance is shown as though the new allocations had been in effect throughout the financial year 2023/24. Where references are made in this report to 2024/25 and future years, no account has been taken of any possible changes of priorities under the new Administration, as these had not been finalised at the time of the issue of this report or any appendices hereto.

#### Budget Monitoring

Overall net expenditure at the end of Quarter 4 for the services reporting to PHSC PAC was £4.102m for the year, compared to the approved budget of £2.439m, representing an overspend of £1.663m.

Capital expenditure at the end of Quarter 4 for PHSC PAC was £0.712m against a total budget of £2.089m, representing an underspend of £1.377m.

#### Performance Monitoring

75.0% (9 of 12) the targetable quarterly KPIs reportable to this Committee achieved their Quarter 4 target.

#### UK Shared Prosperity Fund Update

An update on progress made against schemes using this funding is shown at Appendix 3.

### **Purpose of Report**

The report enables the Committee to consider and comment on the issues raised and actions being taken to address both budget pressures and performance issues as at 31<sup>st</sup> March 2024.

### **This report makes the following recommendations to the Planning and Healthier Stronger Communities Policy Advisory Committee:**

1. That the Revenue position as at the end of Quarter 4 for 2023/24, including the actions being taken or proposed to improve the position, where significant variances have been identified, be noted;
2. That the Capital position at the end of Quarter 4 for 2023/24 be noted;
3. That the Performance position as at Quarter 4 for 2023/24, including the actions being taken or proposed to improve the position, where significant issues have been identified, be noted.
4. That the UK Shared Prosperity Fund update, attached at Appendix 3 be noted.

# 4<sup>th</sup> Quarter Finance Update & Performance Monitoring Report 2023/24

## 1. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
<b>Impact on Corporate Priorities</b>	<p>This report monitors actual activity against the revenue budget and other financial matters set by Council for the financial year. The budget is set in accordance with the Council's Medium-Term Financial Strategy which is linked to the Strategic Plan and corporate priorities.</p> <p>The Key Performance Indicators and strategic actions are part of the Council's overarching Strategic Plan 2019-45 and play an important role in the achievement of corporate objectives. They also cover a wide range of services and priority areas.</p>	Director of Finance, Resources and Business Improvement (Section 151 Officer)
<b>Cross Cutting Objectives</b>	This report enables any links between performance and financial matters to be identified and addressed at an early stage, thereby reducing the risk of compromising the delivery of the Strategic Plan 2019-2045, including its cross-cutting objectives.	Director of Finance, Resources and Business Improvement (Section 151 Officer)
<b>Risk Management</b>	This is addressed in Section 5 of this report.	Director of Finance, Resources and Business Improvement (Section 151 Officer)
<b>Financial</b>	<p>Financial implications are the focus of this report through high level budget monitoring. Budget monitoring ensures that services can react quickly enough to potential resource problems. The process ensures that the Council is not faced by corporate financial problems that may prejudice the delivery of strategic priorities.</p> <p>Performance indicators and targets are closely linked to the allocation of resources and determining good value for money.</p>	Senior Finance Manager (Client)

	<p>The financial implications of any proposed changes are also identified and taken into account in the Council's Medium-Term Financial Strategy and associated annual budget setting process. Performance issues are highlighted as part of the budget monitoring reporting process.</p>	
<b>Staffing</b>	<p>The budget for staffing represents a significant proportion of the direct spend of the Council and is carefully monitored. Any issues in relation to employee costs will be raised in this and future monitoring reports.</p> <p>Having a clear set of performance targets enables staff outcomes/objectives to be set and effective action plans to be put in place.</p>	<p>Director of Finance, Resources and Business Improvement (Section 151 Officer)</p>
<b>Legal</b>	<p>The Council has a statutory obligation to maintain a balanced budget and the monitoring process enables the Committee to remain aware of issues and the process to be taken to maintain a balanced budget.</p> <p>There is no statutory duty to report regularly on the Council's performance. However, under Section 3 of the Local Government Act 1999 (as amended) a best value authority has a statutory duty to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness. One of the purposes of the Key Performance Indicators is to facilitate the improvement of the economy, efficiency and effectiveness of Council services. Regular reports on Council performance help to demonstrate best value and compliance with the statutory duty.</p>	<p>Deputy Head of Legal Partnership</p>
<b>Information Governance</b>	<p>The recommendations do not impact personal information (as defined in UK GDPR and Data Protection Act 2018) the Council processes.</p>	<p>Policy and Information Team</p>
<b>Equalities</b>	<p>There is no impact on Equalities as a result of the recommendations in this report. An EqIA would be carried out as part of a</p>	<p>Equalities and Communities Officer</p>

	policy or service change, should one be identified.	
<b>Public Health</b>	Monitoring performance indicators, revenue budget, expenditure and strategic milestones will have a positive impact on the public's health or that of individuals.	Director of Finance, Resources and Business Improvement (Section 151 Officer)
<b>Crime and Disorder</b>	There are no specific issues arising.	Director of Finance, Resources and Business Improvement (Section 151 Officer)
<b>Procurement</b>	Performance Indicators and Strategic Milestones monitor any procurement needed to achieve the outcomes of the Strategic Plan.	Director of Finance, Resources and Business Improvement (Section 151 Officer)
<b>Biodiversity and Climate Change</b>	The implications of this report on biodiversity and climate change have been considered and there are no direct implications on biodiversity and climate change.	Director of Finance, Resources and Business Improvement (Section 151 Officer)

## 2. INTRODUCTION AND BACKGROUND

- 2.1 The Medium Term Financial Strategy for 2023/24 to 2027/28 - including the budget for 2023/24 - was approved by full Council on 22nd February 2023. This report updates the Committee on how its services have performed for the financial year, up to and including quarter 4, with regard to revenue and capital expenditure against approved budgets.
- 2.2 The reduction in the number of Policy Advisory Committees from four to three and the new allocation of responsibilities between Committees is reflected in this report, such that performance is shown as though the new allocations had been in effect throughout the financial year 2023/24.
- 2.3 Attached at Appendix 1 is a report setting out the revenue and capital spending position at the Quarter 4 stage. Overall net expenditure at the end

of Quarter 4 for the services reporting to PHSC PAC is £4.102m compared to the approved budget of £2.439m, representing an overspend of £1.663m. Capital expenditure at the end of Quarter 4 for PHSC PAC was £0.712m against a total budget of £2.089m, representing an underspend of £1.377m. There are a number of significant variances within that underspend, and these are also detailed in Appendix 1.

- 2.4 Attached at Appendix 2 is a report setting out the position for the KPIs for the corresponding period. Attached at Appendix 3 is an update on the UK Shared Prosperity Fund.

---

### 3. **AVAILABLE OPTIONS**

- 3.1 The Committee is asked to note the contents but may choose to comment.

---

### 4. **PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

- 4.1 In considering the current position on the Revenue budget, the Capital Programme, and the KPIs at the end of March 2024, the Committee can choose to note this information or could choose to comment.

---

### 5. **RISK**

- 5.1 This report is presented for information only and has no direct risk management implications.
- 5.2 The Council produced a balanced budget for both revenue and capital income and expenditure for 2023/24. The budget is set against a continuing backdrop of limited resources and the continuation of a difficult economic climate. Regular and comprehensive monitoring of the type included in this report ensures early warning of significant issues that may place the Council at financial risk. This gives the Cabinet the best opportunity to take actions to mitigate such risks.

---

### 6. **CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK**

- 6.1 The KPIs update ("Performance Monitoring") are reported to the Policy Advisory Committees (PAC) quarterly: Planning and Healthier Stronger Communities PAC and Housing and Community Cohesion PAC. Each committee also receives a report on the relevant priority action areas. The report was also presented to the Climate Transition, Corporate and Environmental Services PAC reporting on the priority areas of "A Thriving Place", "Safe, Clean and Green", "Homes and Communities" and "Embracing Growth and Enabling Infrastructure".

**7. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION**

- 7.1 The Quarter 4 Budget & Performance Monitoring reports are being considered by the relevant Policy Advisory Committees during July 2024.
- 

**8. REPORT APPENDICES**

- Appendix 1: Fourth Quarter Budget Monitoring 2023/24
  - Appendix 2: Fourth Quarter Performance Monitoring 2023/24
  - Appendix 3: UK Shared Prosperity Fund Update 2023/24
- 

**9. BACKGROUND PAPERS**

None.

# APPENDIX 1 – FOURTH QUARTER BUDGET MONITORING

## Contents

### **Part A: Fourth Quarter Revenue Budget 2023/24**

- A1) Revenue Budget
- A2) Significant Variances

### **Part B: Fourth Quarter Capital Budget 2023/24**

- B1) Capital Budget
- B2) Significant Variances

## Part A - Fourth Quarter Revenue Budget 2023/24

### **A1) Revenue Budget: Planning and Healthier Stronger Communities (PHSC) PAC**

- A2.1 The table below provides a detailed summary of the budgeted net expenditure position for the services reporting directly into PHSC PAC at the end of Quarter 4. The financial figures are presented on an accruals basis (i.e. expenditure for goods and services received, but not yet paid for, is included).
- A2.2 This table now shows the variance split between expenditure and income to give more of an insight into the nature of the variance.

**PHSC PAC Revenue Budget: NET EXPENDITURE (@ 4<sup>th</sup> Quarter 2023/24)**

Cost Centre	Approved (Revised) Budget for Year	Actual as at 31 March 2024	Variance as at 31 March 2024		
	Net £000	Net £000	Exp. £000	Income £000	Net £000
<b>Cabinet Member for Healthier Stronger Communities</b>					
Cultural Development Arts	60	56	4	0	5
Museum	19	-19	40	-2	38
Carriage Museum	7	8	0	-2	-1
Museum-Grant Funded Activities	-2	-1	-0	0	-0
Hazlitt Arts Centre	335	324	11	0	11
Festivals and Events	14	48	-31	-3	-34
Leisure Centre	-141	588	-729	0	-729
Mote Park Adventure Zone	-77	-94	0	18	18
Cobtree Golf Course	-35	-22	0	-13	-13
Mote Park Cafe	-65	-45	-4	-16	-20
Parks & Open Spaces Leisure Activities	-2	-2	0	1	1
Mote Park Leisure Activities	-43	-45	3	-0	2
Tourism	11	-1	12	0	12
Museum Shop	-22	-7	-0	-15	-15
Licences	8	6	-1	3	3
Licensing Statutory	-63	-79	-2	18	15
Licensing Non Chargeable	9	9	-0	0	-0
Pollution Control - General	16	0	9	7	16
Contaminated Land	-3	-4	1	0	2
Food Hygiene	10	-12	13	9	22
Sampling	4	1	3	0	3
Occupational Health & Safety	-8	-12	-0	4	4
Infectious Disease Control	1	1	0	0	0
Licensing - Hackney & Private Hire	-67	-88	16	5	21
Innovation Centre	-57	-83	-3	29	26
Lockmeadow	243	204	39	0	39
Lockmeadow Complex	-1,521	-788	-324	-410	-734
Business Support & Enterprise	23	21	1	0	1
Market	22	11	-2	13	11
Economic Dev - Promotion & Marketing	133	154	-9	-12	-21
Public Health - Obesity	0	0	0	-0	0
Public Health - Misc Services	-53	-54	1	0	1
Press & Public Relations	42	43	-4	3	-1



Cost Centre	Approved (Revised) Budget for Year	Actual as at 31 March 2024	Variance as at 31 March 2024		
	Net	Net	Exp.	Income	Net
Leisure Services Section	68	66	1	0	1
Cultural Services Section	371	360	11	0	11
Visitor Economy Section	194	215	-21	0	-21
Licensing Section	123	101	10	12	21
Environmental Protection Section	294	215	80	0	80
Food and Safety Section	288	304	-18	2	-15
Economic Development Section	30	8	16	6	21
Market Section	95	80	15	0	15
Innovation Centre Section	217	147	69	0	69
Communications Section	244	238	5	0	5
Town Centre Services Manager	64	63	1	0	1
<b>Cabinet Member for Healthier Stronger Communities</b>	<b>785</b>	<b>1,916</b>	<b>-790</b>	<b>-342</b>	<b>-1,132</b>

Cost Centre	Approved (Revised) Budget for Year	Actual as at 31 March 2024	Variance as at 31 March 2024		
	Net £000	Net £000	Exp. £000	Income £000	Net £000
<b>Cabinet Member for Planning Policy &amp; Management</b>					
Building Regulations Chargeable	-395	-420	11	14	25
Building Regulations Non Chargeable	0	0	0	-0	-0
Building Control	-1	2	-8	5	-3
Development Control Advice	-293	-143	-11	-139	-150
Development Control Appeals	138	251	-115	3	-113
Development Control Majors	-557	-477	2	-82	-80
Development Control - Other	-775	-655	-49	-71	-120
Development Control Enforcement	75	84	-13	3	-9
Planning Policy	643	640	2	0	2
Neighbourhood Planning	-20	-20	0	0	0
Conservation	-11	-4	0	-7	-7
Land Charges	-262	-221	7	-48	-42
Spatial Policy Planning Section	372	372	-5	4	-0
Head of Planning and Development	113	116	-3	0	-3
Building Surveying Section	479	449	29	1	30
Mid Kent Planning Support Service	345	283	101	-39	62
Heritage Landscape and Design Section	343	288	55	-0	55
CIL Management Section	10	6	4	0	4
Mid Kent Local Land Charges Section	75	62	91	-77	13
Development Management Section – Majors	312	292	19	0	19
Development Management Section – Others	1,131	1,178	-47	0	-47
Head of Spatial Planning and Economic Develop	108	102	6	0	6
Salary Slippage 2SPI	-175	0	-175	0	-175
<b>Cabinet Member for Planning Policy &amp; Management</b>	<b>1,654</b>	<b>2,186</b>	<b>-98</b>	<b>-433</b>	<b>-531</b>
<b>Planning and Healthier Stronger Communities</b>	<b>2,439</b>	<b>4,102</b>	<b>-888</b>	<b>-775</b>	<b>-1,663</b>

## A2) PHSC PAC Revenue Budget: Significant Variances

A2.1 Within the headline figures, there are a number of both adverse and favourable net expenditure variances for individual cost centres. It is important that the implications of variances are considered at an early stage, so that contingency plans can be put in place and, if necessary, be used to inform future financial planning. Variances will be reported to each of the Policy Advisory Committees on a quarterly basis throughout 2023/24.

A2.2 The table below highlights and provides further detail on the most significant variances at the end of Quarter 4.

	Positive Variance Q4	Adverse Variance Q4
<b>Planning and Healthier Stronger Communities</b>	<b>£000</b>	
<p><b>Leisure Centre</b> – The overspend in this area relates principally to the Lockmeadow Health Club. This was operated by David Lloyd until their lease expired in May 2023. The Council then took it over and engaged Serco to operate it as an extension to the contract for running the Leisure Centre. Membership income has had to be rebuilt and running costs have exceeded expectations, with a higher staffing requirement than was anticipated and substantial expenditure to bring the facilities up to an acceptable standard.</p> <p>There has also been an overspend at the Mote Park leisure centre relating to additional utility costs. Under the terms of the existing contract with Serco, when utility costs rise above a specified level the Council is liable to meet the difference. This threshold is to be re-based when a contract extension commences in August 2024.</p>		-729
<p><b>Development Control Advice</b> - Income from Planning Performance Agreements and pre-application planning advice has continued to be significantly down on budget. The Head of Service states that this is because developers have waited for the new Local Plan to be adopted before progressing with further applications.</p>		-149
<p><b>Development Control Appeals</b> – There were a number of significant appeals this year which led to an overspend on this budget. There are sums set aside to use where there are significant appeals costs but as this overspend can be contained within the Council’s overall budget it is not proposed to draw down on these.</p>		-113

<p><b>Development Control Majors</b> - Income from major applications continued to be significantly down this year. This is said to be for the same reason as income from development control advice is below budget, i.e. developers have waited for the new Local Plan to be adopted before progressing with further applications.</p>		-80
<p><b>Development Control Other</b> – Having been in line with budget for the first three quarters, income from minor applications reduced in the final quarter. There were increased running costs from the use of an external agency to process planning applications during the first half of the year.</p>		-120
<p><b>Lockmeadow Complex</b> - A number of units at the complex have fallen vacant during the period, leading to a shortfall against budget. The Corporate Property team has been active in seeking to find new tenants for vacant units. A tenant offering virtual reality experiences moved into one of the vacant units during 2023/24. The former David Lloyd unit now operates as the Lockmeadow Health Club, under the same management as the council’s leisure centre. However, the former Frankie &amp; Benny’s and Feathers units remain vacant. New letting agents have been taken on to identify potential tenants, recognising that changes in the leisure and hospitality market mean that different approaches and different types of tenant need to be considered.</p>		-733

# Part B - Fourth Quarter Capital Budget 2023/24

## B1) Capital Budget 2023/24 (@ 4<sup>th</sup> Quarter 2023/24)

Capital Programme Heading	Revised Estimate 2023/24	Actual to March 2024	Budget Remaining
	£000	£000	£000
<b>Planning and Healthier Stronger Communities</b>			
Mote Park Lake - Dam Works	40	40	0
Museum Development Plan	389	571	-182
Leisure Provision	699	73	626
Tennis Courts Upgrade	40	19	21
Riverside Walk Works	250		250
Mote Park Kiosk Refurbishment & Extension	15	8	7
Bridges Gyratory Scheme	206		206
Town Centre Strategy	450		450
<b>Total</b>	<b>2,089</b>	<b>712</b>	<b>1,377</b>





## B2) Capital Budget Variances (@ 4<sup>th</sup> Quarter 2023/24)




<b>Planning and Healthier Stronger Communities</b>
<b>Museum Development Plan</b> - Further works took place in the new Archaeology Gallery in the final quarter, which took the cost of the project over the approved budget for the year in the capital programme. However, this was anticipated as external funding had been secured to cover these costs.
<b>Leisure Provision</b> - The extension to the contract for the management of the centre was agreed earlier in the year, and there was the possibility of some of the planned capital works starting in the final quarter, but these did not happen, and the unused budget will be rolled forward into 2023/24.
<b>Riverside Walk Works</b> - This project has now been subsumed into plans for Town Centre improvement works, including upgrades to lighting in the Town Centre. The budget will therefore be carried forward to 2024/25.
<b>Bridges Gyratory Scheme</b> - Plans are in place for the construction of a flood barrier at the bottom of Medway Street as the final element of the Bridges Gyratory Scheme. It has unfortunately proved a slow process getting the necessary approvals for the barrier, as it will be situated on highways land. It is envisaged that construction will take place this autumn.
<b>Public Realm &amp; Greening relating to the Town Centre</b> - The current strategy is being developed and is likely to be adopted in the near future.

# APPENDIX 2: PART A

## FOURTH QUARTER PERFORMANCE MONITORING

### Key to performance ratings

RAG Rating	
	Target not achieved
	Target slightly missed (within 10%)
	Target met
	Data Only















Direction	
	Performance has improved
	Previous data not captured
	Performance has declined
N/A	No previous data to compare

### Performance Summary

RAG Rating	Green	Amber	Red	N/A <sup>1</sup>	Total
KPIs	9	1	1	10	21
Direction	Up	No Change	Down	N/A	Total
Last Quarter	10	2	5	4	21
Last Year	9	0	5	7	21

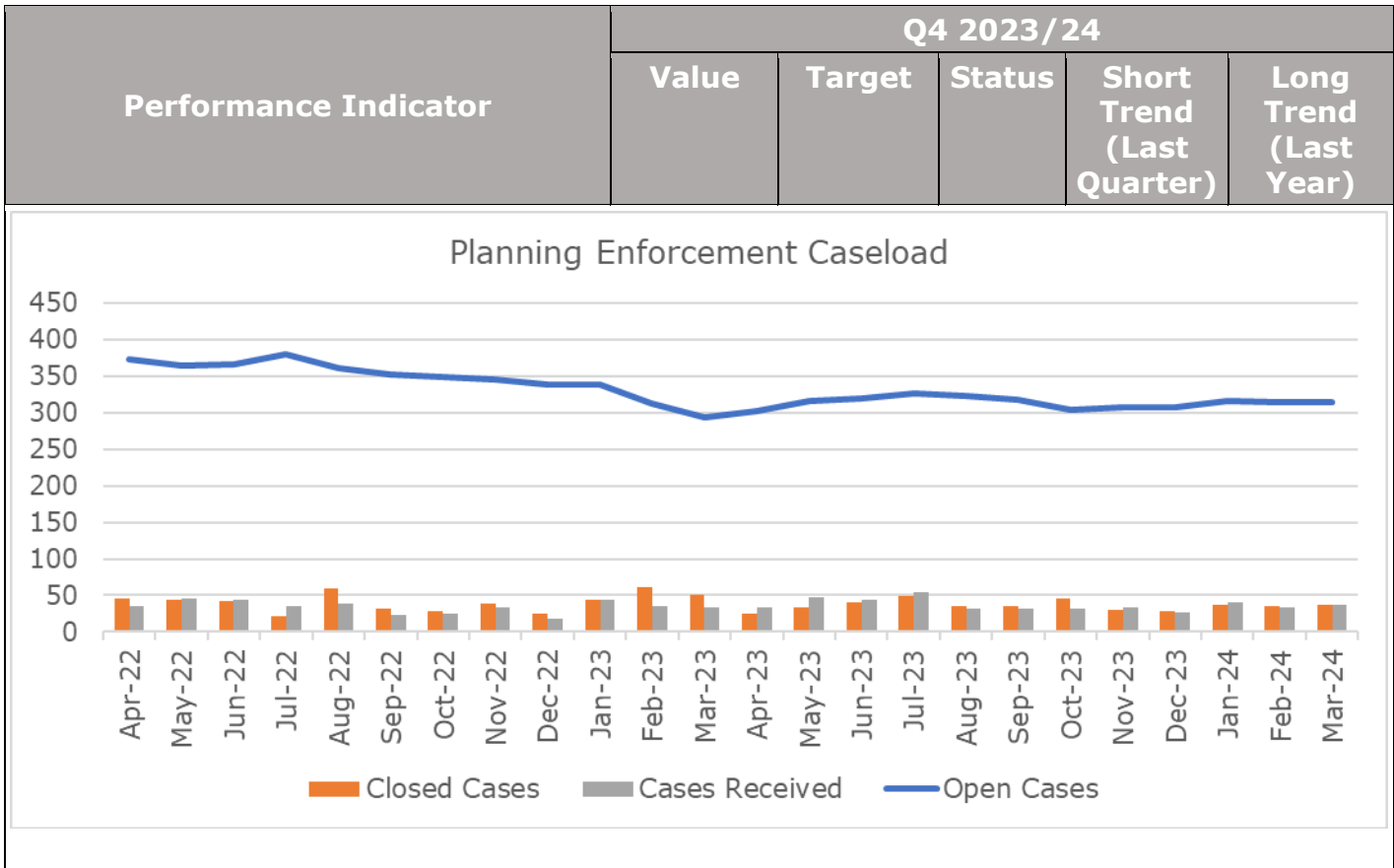
- 75.0% (9 of 12) the targetable quarterly key performance indicators (KPIs) reportable to this Committee achieved their Quarter 4 (Q4) target<sup>1</sup>.
- Compared to last quarter (Q3 2023/24), performance for 58.82% (10 of 17) KPIs have improved, and 29.41% (5 from 17) have declined<sup>1</sup>.
- Compared to last year (Q4 2022/23), performance for 64.28% (9 of 14) KPIs improved, and 35.71% (5 of 14) KPIs have declined<sup>1</sup>.

### Planning and Healthier Stronger Communities Q4 Performance

Performance Indicator	Q4 2023/24				
	Value	Target	Status	Short Trend (Last Quarter)	Long Trend (Last Year)
<b>Healthier Stronger Communities</b>					
Footfall at the Museum and Visitors Information Centre	11,175	12,500			
Number of users at the Leisure Centre	128,949	127,476			
Number of outreach projects/work undertaken by the Hazlitt	12				N/A
Percentage of tickets sold at the Hazlitt	73.55%	50%			
Market Hall Occupancy Percentage	82.42%	75%			N/A

<sup>1</sup> PIs rated N/A are not included in the summary calculations.

Performance Indicator	Q4 2023/24				
	Value	Target	Status	Short Trend (Last Quarter)	Long Trend (Last Year)
Percentage change in Utility costs for the leisure centre	+1.09% <i>Jul-Dec 2023</i>			N/A	N/A
<b>Planning Policy and Management</b>					
Percentage of priority 1 enforcement cases dealt with in time	100%	98%		-	
Percentage of priority 2 enforcement cases dealt with in time	97.06%	92%			
Number of enforcement complaints received	110				
Open planning enforcement cases (as at start of month) <i>(see graph below)</i>	305				
Number of enforcement cases closed <i>(see graph below)</i>	110				
Processing of planning applications: Major applications (NI 157a)	100.00%	90.00%		-	
Processing of planning applications: Minor applications (NI 157b)	98.06%	95.00%			
Processing of planning applications: Other applications (NI 157c)	100.49%	98.00%			
Percentage of planning applications meeting Biodiversity Net Gain 20% adopted standard	Data not available until 2024/25				
MBC Success rate at planning appeals with a rolling 12-month period	69.61%	70%			N/A
New additional homes provided (NI 154)	Annual Indicator				
Footfall in the Town Centre	6,546,326	6,187,514			
Percentage of vacant retail units in the town centre	Annual Indicator				
Percentage of unemployed people in Maidstone	3.16%				
Number of youths unemployed (18-24)	1,825				
At the request of the previous PIED policy advisory committee, the graph below is provided to show tracking of the open caseload of the Planning Enforcement team each month, from April 2022 to date. The Q4 data for this can also be found in the table above.					



**Comments (where targets have been missed)**

**The Museum**

The KPI tracking the "Footfall at the Museum and Visitors Information Centre" achieved a total of 11,175 visitors against a target of 12,500. This represents a shortfall of 1,325 visitors, or approximately 11% below the target. Despite a busy February half term, week days were quiet, recording low visitor figures. However, we would expect to see much better figures in 2024/25, with the new 'Museum What's On' Flier, communicating to members of the public about exciting activities to take part in at the Museum. Additionally, Carriage Museum figures are positive and the launch of the new Gallery is expected to boost figures enormously.

**Development Management**

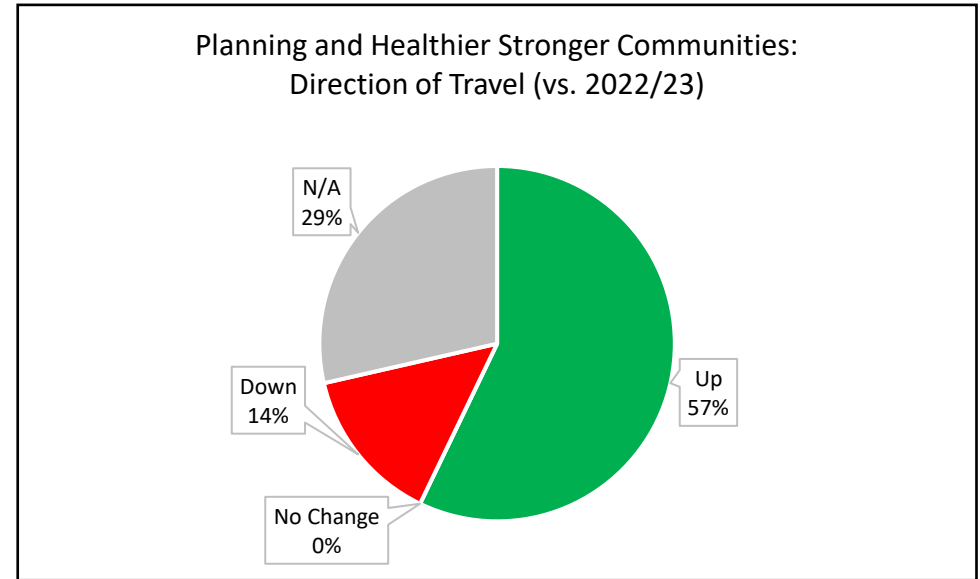
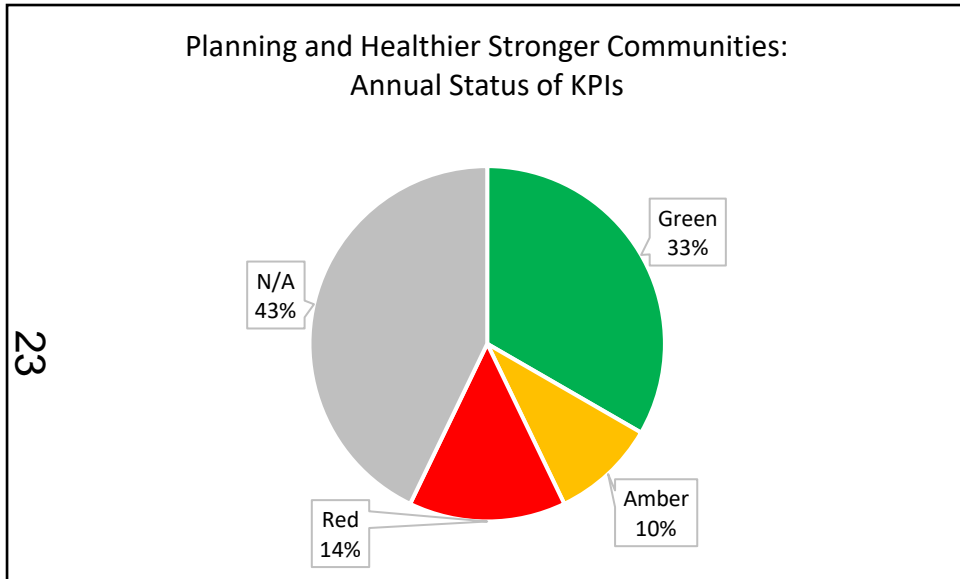
Although the KPI for "MBC Success Rate in Planning Appeals over a 12-month rolling period" fell short of its target by a small margin, achieving 69.61% to a target of 70.00%, it's notable that there has been a consistent improvement in the success rate since the measuring of the metric began, rising from 61.54% in quarter one to 69.61% in quarter four.



# APPENDIX 2: PART B – END OF YEAR PERFORMANCE MONITORING

## Planning and Healthier Stronger Communities: 2023/2024 End-of-Year Outturn

### Annual Performance Summary





















#### Notes & Key to Icons

- A key to the icons used in this report is shown on the right-hand side.
- Direction of travel for targeted performance indicators (PIs) shows if performance has improved or declined. For 'Data Only' PIs, the direction of travel shows if there has been an increase or decrease in volume.
- Where KPIs are providing data "as at the end of the month", the annual outturn is provided as an average figure, taken from the quarterly performance, for the 2023/24 year.
- Data for many of the annual indicators is still being collated, and therefore not currently available at the time of publishing this report. Updates will be provided to this PAC at the next reporting cycle.

RAG Rating		Direction	
	Target not achieved		Performance has improved
	Target slightly missed (within 10%)		Performance has been sustained
	Target met		Performance has declined
	Data Only	N/A	No previous data to compare

## Planning and Healthier Stronger Communities PAC 2023/24 Performance

Indicator	Q1 2023/24	Q2 2023/24	Q3 2023/24	Q4 2023/24	Annual 2023/24	Annual Target 2023/24	Annual Status	Direction of travel
<b>Healthier Stronger Communities</b>								
Footfall at the Museum and Visitors Information Centre	7,607	12,984	8,235	11,175	40,001	50,000		
Number of users at the Leisure Centre	135,178	120,270	116,051	128,949	500,448	490,292		
Number of outreach projects/work undertaken by the Hazlitt	32	22	17	12	83			N/A
Percentage of tickets sold at the Hazlitt	62.6%	68.08%	82.45%	73.55%	73.63%	50%		
Market Hall Occupancy Percentage	81.32%	56.04%	72.53%	82.42%	73.08%	75%		N/A
Percentage change in utility costs for the leisure centre	-9.67% <i>Jan-Jun 2023</i>		+1.09% <i>Jul-Dec 2023</i>		-4.82% <i>Jan-Dec 2023</i>			N/A
<b>Planning Policy and Management</b>								
Percentage of priority 1 enforcement cases dealt with in time	100%	100%	100%	100%	100%	98%		
Percentage of priority 2 enforcement cases dealt with in time	93.44%	96.72%	96.7%	97.06%	95.88%	92%		
Number of enforcement complaints received	124	127	92	110	453			

Indicator	Q1 2023/24	Q2 2023/24	Q3 2023/24	Q4 2023/24	Annual 2023/24	Annual Target 2023/24	Annual Status	Direction of travel
Open planning enforcement cases	<p>Number of Open Planning Enforcement Cases (as at beginning of the month)</p>				305			
Number of enforcement cases closed	98	129	115	110	452			
Processing of planning applications: Major applications (NI 157a)	90.91%	100%	100%	100%	97.92%	90%		
Processing of planning applications: Minor applications (NI 157b)	95.24%	99.11%	99.02%	98.06%	98.00%	95.00%		
Processing of planning applications: Other applications (NI 157c)	98.71%	97.93%	99.13%	100.49%	99.01%	98.00%		
Percentage of planning applications meeting Biodiversity Net Gain 20% adopted standard	Data not currently available				Data not currently available			
MBC Success rate at planning appeals with a rolling 12-month period	61.54%	65.96%	66.94%	69.61%	69.61%	70%		N/A
New additional homes provided (NI 154)	Annual Indicator				Data not due to be available until Summer 2024	1157	TBC	TBC

Indicator	Q1 2023/24	Q2 2023/24	Q3 2023/24	Q4 2023/24	Annual 2023/24	Annual Target 2023/24	Annual Status	Direction of travel
Footfall in the Town Centre	4,955,613	4,213,273	5,912,738	6,546,326	21,627,950	24,750,056		
Percentage of vacant retail units in the Town Centre	Annual Indicator				13.2%	11%		
Percentage of unemployed people in Maidstone <i>(as at end of quarter)</i>	2.9%	3.0%	3.0%	3.2%	3.2%			
Number of youths unemployed (18-24)					640			

## Head of Service Summary of Performance in 2023/24

### Head of Spatial Planning & Economic Development comments:

With interest rates falling, there are early signs of improvement in customer confidence on the High Street, however it has continued to be tough time for the retail, leisure and hospitality sector and highstreets nationally over the last financial year. This is strengthened by the PI monitoring footfall in the Town Centre, which saw an increase of **1,476,095** unique visitors in Q4 2024 compared to Q4 2023.

The vacant units in the Town Centre also improved this year, dropping to 13.2% in January 2024, compared to 16.3% in April 2023. Savills Q1 2024 report on Shopping Centres and High Street performance states the average High Street void rate in the UK in 2023 was 14% increasing from 13.8% in 2022.

Whilst unemployment figures have continued to drop since the height of the pandemic, they have risen this year. However, Maidstone's unemployment rate remains lower than the average in Kent and Great Britain. Our youth unemployment rate (18-24yo) is consistent with the average across Kent (5.3% in March 2024).

Head of Development Management comments:

There was another very strong year with regard to meeting processing targets for all types of planning applications. This should be seen in the context of a lower than anticipated volume of applications, which as noted in Appendix 1 has led to a shortfall on budgeted income. It is particularly pleasing to see an approximately 70% success rate for appeals (despite many obstacles) which puts MBC as high performer from a national perspective. However, as also noted in Appendix 1, the cost of the failed appeals exceeded budget.

Leisure Contracts Manager comments:

Maidstone Leisure Centre received over half a million visits in the last Financial Year, slightly above the target set by MBC. Maintaining above target performance is commendable within the context of the competitive market of offering health and leisure facilities, notwithstanding providing these services in an aging building that requires regular upkeep. Overall customer satisfaction with the Leisure Centre experience sits at 83%, above the 80% target set by MBC. Utility costs at the Leisure Centre saw a 9% reduction in the first half of 2023 against a nominated based line of 2022, but have risen by 1% against that baseline in the second half of 2023; making an average overall reduction of 4.82% on the whole of 2023 against 2022.

The Hazlitt Theatre continues to be a cultural hub for the Borough and the introduction of the Hazlitt Institute in 2022 has given a focal point for the development of performance skills amongst young people. The Institute provides outreach activity in schools and delivers both Theatre-based and external performance as the vehicle of delivery for this development; there were 83 outreach projects delivered in the year. As for theatre patronage, 73% of available tickets were sold to 63,500 customers across all shows in the year and of these 84% of visitors were satisfied or very satisfied.

## UKSPF Year 2 Progress Report

### Summary

Year 2; 2023/24 of the UK Shared Prosperity Fund (UKSPF) saw Maidstone Borough Council awarded £298,478 to spend towards the Community and Place Investment Priority as set out in the UKSPF Project Plan. This figure included a small underspend of £7,397 from Year 1 activities.

During this year MBC spent £298,357 towards interventions such as: Improvements to the Town Centre, Creation and improvement to local green spaces, supporting local arts and heritage activities, campaigns to encourage visits to the town centre and volunteering and social action projects.

In the final year of funding; 2024/25, MBC will have £741,661 provided by central government to continue the progress of projects to date, as well as a large-scale capital project to provide a safe and attractive town centre, through enhancements to greening and a lighting infrastructure.

Further to this, the government launched the Rural England Prosperity Fund (REPF) prospectus as an addition to the UK Shared Prosperity Fund. We were allocated £539,728 to spend between 2023 and 2025 on capital interventions in our rural communities as part of the REPF. The REPF in Maidstone aims to support rural communities to modernise and improve their assets to provide multiuse spaces that improve health, wellbeing, reduce rural loneliness, while having a positive impact on the local environment, contribute towards net zero, support the local rural economy, and promote community cohesion. Grants of up to £50,000 were made available to eligible organisations. In 2023/24 four bids from local community groups were successful, with £134,932 awarded to projects such as installing Solar Panels and Electric Vehicle Charge Points.

### Updates on Projects and activities in Year 2

Year 2 of UKSPF activities has seen multiple projects continue across Maidstone town centre. Many different events have been taking place across the town, which with the support of the UK Shared Prosperity Fund has increased visitors and footfall into Maidstone. These events include the Maidstone Arts Carnival, River Carnival and Wild about Maidstone. In October 2023, we hosted Maidstone's first ever Literary Festival. The event championed local authors, with a showcase event at Lockmeadow Entertainment Centre, readings and workshops across Maidstone primary schools, Kent Library and History Centre, The Archbishop's Palace and Maidstone Museum. Funding from UKSPF has also supported our town centre special of Borough Insight Magazine which was delivered to over 83,000 residential addresses across the borough, keeping residents up to date with events and opportunities for all in our Town Centre.

Our Creative Community Grants have distributed thousands of pounds to local community groups. In year 2, this was 22 community groups receiving funding of up to £2,000 per project. Each project prioritising pride in our borough and its communities, increasing participation/engagement in arts and cultural activities; working with diverse audiences and supporting new and existing creative talent in the borough.

The sculptures for the Iggy Sculpture Trail were installed on 27th & 28th March by the artists Gary and Thomas Thrussell, under the watchful gaze of David Britchfield, Archaeologist. No significant archaeological finds were made during the excavations and the installations went ahead without incident. A launch event was held on Wednesday 3rd April 2024 featuring a giant T-Rex and two baby dinosaurs (puppets). The Mayor officially launched the new 'Magical Beasts' sculpture trail before the dinosaurs went walkabout in Brenchley Gardens and Fremlin Walk. More than 400 people attended the launch in the morning. The action moved to Lockmeadow Entertainment Centre in the

afternoon where two interactive 'How to train your Dinosaur' shows were delivered to around 100 people per show. The digital app that supports the new physical sculpture trail was also promoted during the launch event with lots of people taking leaflets and scanning the QR code on the promotional banner. As of 7th April, 715 people have downloaded the app; 1,388 individual sights have been visited (recorded by GPS so represents actual footfall); and 376 people have viewed the Magical Beasts trail.

In partnership with Involve Kent, our Green Spaces volunteering projects commenced this year. 100% of volunteers said they enjoyed taking part in volunteering and that it increased their sense of feeling connected in the community. A total of 87 supported volunteering sessions took place, which included regularly attended events at Maidstone Community Support Centre Community Garden, Brenchley Gardens, Trinity House, The Amphitheatre and Rose Garden, and Maidstone Museum, these will continue into 2024/25.

The 'REPF' grants for the borough of Maidstone aim to support rural communities to help modernise and improve assets to provide multiuse spaces and improve health, wellbeing, reduce rural loneliness. Following the full allocation towards four successful bids for rural funding in 2023/24 a further 21 submissions were received by local community groups and parishes for funding in 2024/25. The panel conducted a review of submissions in February and awarded the remaining funding 12 bids from across the borough. These projects will commence in April 2024 with progress closely monitored by officers to ensure all are completed by March 2025.

In Year 3 we will continue our series of events supporting visitors to Maidstone Town Centre. This includes the return of our Literacy Festival in October 2024 following the success in Year 2. Our final year of the Green Volunteering Project will see opportunities on a weekly basis to get involved in greening up, planting and revitalising planting areas across the Town Centre. These opportunities will increase over the summer months.

'Shaun the Sheep in the Heart of Kent' is an exciting free art trail that will see up to 50 large individually decorated Shaun the Sheep sculptures placed around the parks, town centre and river walks in Maidstone and the surrounding areas. This will launch on June 29<sup>th</sup> and is delivered by our partner Heart of Kent Hospice.

Our outdoor fitness and gym equipment has begun installation at Lockmeadow Entertainment Centre. The project is expected to be open to the public from May 2024.

**UKSPF 2023/4 Quarter 4 Update:**

Officers have now completed our projects for year 2, with new project leads identified for year 3 expenditure, which includes the largest proportion of our UKSPF allocation. Year 3 will see new projects commencing to improve greening and lighting infrastructure and interactive outdoor equipment at Lockmeadow Entertainment Centre, along with continuing to support events in the Town Centre and our partnership with Heart of Kent Hospice to deliver the new Elmer Trail from July.

**Year 2 projects and an update:**

Intervention	Project	Detail	2023/24 budget	Amount spent:	£ To be added to Year 3	Q4 Update:
E6: Local arts, cultural, heritage & creative activities	Project A - Building Pride in Place through promotion of the Town Centre and Events.	Creative communities fund for local organisations and groups to support events	£34,010	£34,000	£10	In year 2 we supported 22 organisations with a creative communities grant. A new round of grants will open in May 2024.
		Literature Festival	£17,280	£17,277	£3	The event was successfully held in October and saw large audiences of all ages coming along to enjoy the wide variety of authors and workshops using town centre venues including Maidstone Museum, Archbishops' Palace and All Saints Church. The festival will return in 2024.
		Iggy Sculpture Trail	£61,010	£61,010	£0	The trail was officially launched by the Mayor in March and is supported by a digital trail app.
		Equipment purchases to support events	£3,083	£3,083	£0	Purchases of a set of temporary exhibition walls and 2 microphones have been completed.
		Arts Carnival	£20,000	£20,000	£0	The Arts Carnival, which was rearranged due to adverse weather, took place on Saturday 9 <sup>th</sup> September. The next Carnival will take place in 2025.
		Partner for Elmer 2	£40,000	£40,000	£0	Contract has been signed with the launch expected July 2024.



	Project C- A Community Arts Hub & Maker Space	Feasibility Study	£5,260	£5,266	-£6	The final amended feasibility report was received in August with an MBC working group set up to action the results of the report.
E8: Campaigns to encourage visits and exploring of local area	Project A - Building Pride in Place through promotion of the Town Centre and Events.	Advertising budget to promote events across all channels	£12,480	£12,366	£114	Advertising budget has been used to promote events throughout the year.
		Borough Insight Events and Town centre focussed	£30,000	£30,000	£0	This was spent on the Autumn edition of the magazine which was delivered to residents from October 2023.
		Promotional video for business and events in TC	£5,000	£5,000	£0	This video promoted the use of UKSPF funds to support the Town Centre over the first two years of funding and is now available online.
E9: Impactful Volunteering and/or Social action Projects	Project B- A Safe and Attractive Town Centre achieved through Greening and Lighting	An externally commissioned green Volunteering Project to Improve Town Centre Green Spaces, Increase Volunteering and Improve Wellbeing.	£60,000	£60,000	£0	Five sites have been worked with 28 volunteers involved with 87 volunteering events. The sites are Maidstone Community Support Centre, Trinity House, Brenchley Gardens, Fairmeadow and planters in the Town Centre. This project will continue into 2024/25.
Management Overheads			£9,897	£9,897	£0	
<b>Total:</b>			<b>£299,820</b>	<b>£299,699</b>	<b>£121</b>	
				<b>£299,820</b>		

In addition to the UK Shared Prosperity Fund, we have received an allocation from the government's Rural England Prosperity Fund. Following the distribution of £184,370 towards four successful bids for rural funding in 2023/24 a further 21 submissions have been received for funding in 2024/25. The panel conducted a review of submissions in February and awarded the remaining £359,920 to 11 bids from across the borough. These projects commence in April 2024 with progress to be closely monitored by officers to ensure all are completed by March 2025.

# Agenda Item 11

## Planning and Healthier Stronger Communities Policy Advisory Committee

9 July 2024

### Headcorn Neighbourhood Plan Regulation 16 Response

<b>Timetable</b>	
<b>Meeting</b>	<b>Date</b>
Planning and Healthier Stronger Communities Policy Advisory Committee	9 July 2024
Cabinet Member for Planning Policy and Management	TBD

<b>Will this be a Key Decision?</b>	No
<b>Urgency</b>	Not Applicable
<b>Final Decision-Maker</b>	Cabinet Member for Planning Policy and Management
<b>Lead Head of Service</b>	Karen Britton, Head of Spatial Planning & Economic Development
<b>Lead Officer and Report Author</b>	Erik Nilsen, Principal Planning Officer; Nicola Stokes, Planning Officer
<b>Classification</b>	Public
<b>Wards affected</b>	Headcorn and Sutton Valence

#### Executive Summary

Headcorn Parish Council have prepared the Headcorn Neighbourhood Plan (Appendix 2 of this report) and submitted it to Maidstone Borough Council. In accordance with the Neighbourhood Planning (General) Regulations 2012, as amended, it is the role of the Borough Council to ensure that certain conditions have been satisfied at this stage, and to facilitate a statutory public consultation on the submission Plan and supporting documents. It is confirmed that Borough Council officers are satisfied that regulatory requirements under the Regulations 14 and 15 have been met during the preparation of the plan. A public consultation is therefore being carried out in accordance with Regulation 16, running for a period of 7-weeks from 24 June to 12 August 2024.

The Borough Council is also a statutory consultee for the purpose of making representations on the Headcorn Neighbourhood Plan. The Committee is requested to consider the Council's formal response to the consultation (attached as Appendix

1), prior to it being passed on to the Cabinet Member for Planning Policy and Management. It is intended that the response is formally submitted prior to the close of the consultation, in accordance with Regulation 16. Following the consultation period, the submission documents and all representations received will be passed to the independent Examiner for examination into the plan.

**Purpose of Report**

Recommendation to Cabinet Member.

**This report asks the Committee to consider the following recommendation to the Lead Cabinet Member**

1. That the Council's representation in response to the Regulation 16 consultation on the Headcorn Neighbourhood Plan, attached at Appendix 1, be recommended for approval to the Cabinet Member for Planning Policy and Management.

# Headcorn Neighbourhood Plan Regulation 16 Response

## 1. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
<b>Impact on Corporate Priorities</b>	<p>The four Strategic Plan objectives are:</p> <ul style="list-style-type: none"> <li>• Embracing Growth and Enabling Infrastructure</li> <li>• Safe, Clean and Green</li> <li>• Homes and Communities</li> <li>• A Thriving Place</li> </ul> <p>It is not expected that the recommendations will by themselves materially affect achievement of corporate objectives; however, following a successful examination and referendum, the Headcorn Neighbourhood Plan will form part of the Maidstone Development Plan, which will assist in the delivery of the Council's Strategic Plan.</p>	Karen Britton – Head of Spatial Planning & Economic Development
<b>Cross Cutting Objectives</b>	<p>The four cross-cutting objectives are:</p> <ul style="list-style-type: none"> <li>• Heritage is Respected</li> <li>• Health Inequalities are Addressed and Reduced</li> <li>• Deprivation and Social Mobility is Improved</li> <li>• Biodiversity and Environmental Sustainability is respected</li> </ul> <p>It is not expected that the recommendations will by themselves materially affect achievement of corporate objectives; however, following a successful examination and referendum, the Headcorn Neighbourhood Plan will form part of the Maidstone Development Plan, which will assist in the delivery of the Council's Strategic Plan.</p>	Karen Britton – Head of Spatial Planning & Economic Development
<b>Risk Management</b>	Risks are set out in Section 5 of the report. This consultation (Regulation 16) is being run to ensure that the plan meets the requirements of national legislation.	Karen Britton – Head of Spatial Planning & Economic Development
<b>Financial</b>	The proposals set out in the recommendations are within already approved budgetary	Adrian Lovegrove –

	headings and so need no new funding for implementation. The costs for consultation (Regulation 16), examination, referendum and adoption of the Headcorn Neighbourhood Plan are borne by the Borough Council. There is a dedicated budget for this purpose, funded by the government Department for Levelling Up, Housing and Communities neighbourhood planning grants.	Head of Finance  Mark Green - Section 151 Officer
<b>Staffing</b>	The recommendations can be delivered with our current staffing.	Karen Britton – Head of Spatial Planning & Economic Development
<b>Legal</b>	Accepting the recommendations will fulfil the Council’s duties under the Town and Country Planning Act 1990, as amended by the Localism Act 2011, the Housing and Planning Act 2016, and the Neighbourhood Planning Act 2017. The recommendations also comply with the Neighbourhood Planning (General) Regulations 2012 (as amended).	Russell Fitzpatrick - MKLS (Planning)
<b>Information Governance</b>	The recommendations do not impact personal information (as defined in UK GDPR and Data Protection Act 2018) the Council processes.  The Borough Council will carry out the Regulation 16 stage public consultation in accordance with legislation and its adopted Statement of Community Involvement (2020).	Lauren McNicol - Information Governance Team  Georgia Harvey – Information Governance Team
<b>Equalities</b>	The recommendations do not propose a change in service therefore will not require an equalities impact assessment.  The Council has a responsibility to support community groups, where they are designated neighbourhood forums, and parish councils in preparing neighbourhood plans. The neighbourhood planning process provides an opportunity for communities to shape a plan that meets the housing and other needs in their local areas.	Karen Britton – Head of Spatial Planning & Economic Development

<b>Public Health</b>	It is not expected that the recommendations will by themselves materially affect public health; however, following a successful examination and referendum, the Headcorn Neighbourhood Plan will form part of the Maidstone Development Plan, the delivery of which will have a positive impact on population health or that of individuals.	Karen Britton – Head of Spatial Planning & Economic Development
<b>Crime and Disorder</b>	There are no implications to Crime and Disorder.	Karen Britton – Head of Spatial Planning & Economic Development
<b>Procurement</b>	An independent plan Examiner has been appointed from Intelligent Plans and Examinations (IPE). One quote was requested and received for this appointment, and the cost falls well within the threshold that would be required for a competitive tender process. The appointment will be signed by the Head of Spatial Planning and Economic Development.	Adrian Lovegrove – Head of Finance  Mark Green - Section 151 Officer
<b>Biodiversity and Climate Change</b>	The implications of this report on biodiversity and climate change have been considered. It is not expected that the recommendations will by themselves materially affect the Biodiversity and Climate Change Action Plan; however, the submission version of the Headcorn Neighbourhood Plan broadly supports the Biodiversity and Climate Change Action Plan, and the report recommendations further seek to strengthen this alignment.	James Wilderspin - Biodiversity and Climate Change Officer

## 2. INTRODUCTION AND BACKGROUND

- 2.1 Parish councils and designated neighbourhood forums can prepare neighbourhood development plans, also known as neighbourhood plans, for their designated neighbourhood areas. Neighbourhood plans are required to have regard to national policy and be in general conformity with the strategic policies of the development plan for the area. Neighbourhood plans go through two rounds of mandatory public consultation before independent examination, local referendum and being 'made' (adopted) by Maidstone Borough Council. The procedures for designating neighbourhood areas and preparing neighbourhood development plans are set out in The Neighbourhood Planning (General) Regulations 2012 (as amended).
- 2.2 Headcorn parish was designated a neighbourhood area on 8 April 2013. The parish council undertook a 6-week public consultation on the pre-submission version of the neighbourhood plan (Regulation 14) between 22

June and 14 August 2023. The Council submitted a representation on the draft plan). Following consultation, the parish council has made changes to the plan following receipt of the representations.

- 2.3 When a parish council or designated neighbourhood forum submits a neighbourhood plan, the Borough Council has a responsibility to ensure that regulatory requirements have been met, i.e. that public consultation on the pre-submission draft plan was carried out in accordance with Regulation 14, and that the submission plan and supporting documentation meet Regulation 15 obligations. Officers have reviewed the submission documents in accordance with the Borough Council's published Neighbourhood Planning Protocol, having regard to the legislation, and are satisfied that the requirements have been met.
- 2.4 The next stage of the plan process is a second round of public consultation, on the submission version of the neighbourhood plan (Regulation 16), prior to the plan being considered at independent examination. The Borough Council is only responsible for facilitating this consultation and has agreed the consultation dates with the Headcorn Parish Council, being 24 June to 12 August 2024. This is a 7-week consultation period, which is longer than the statutory minimum 6-weeks. An additional week has been provided in order to account for part of the consultation period occurring during the school summer break. The public consultation is being undertaken in accordance with the planning regulations, the Council's adopted Statement of Community Involvement and its Neighbourhood Planning Protocol.
- 2.5 The full set of submission documents for the Headcorn Neighbourhood Plan, are included with this report as Appendices 2, 3, 4 and 5. In addition, the Parish Council has compiled a suite of evidence base documents in support of the plan, including evidence which it has prepared itself in support of the plan. The evidence base is included as Appendix within the submission Headcorn Neighbourhood Plan (Appendix 2 to this report).
- 2.6 The Borough Council is responsible for appointing an independent Examiner (in agreement with the Parish Council) and for arranging the examination following the close of consultation. The Headcorn Neighbourhood Plan and accompanying submission documents must be forwarded to the appointed Examiner, together with all representations received, for the Examiner's consideration. Derek Stebbing (Intelligent Plans and Examinations) has been appointed to examine the plan. A neighbourhood plan examination is usually dealt with by written representations, although an Examiner can move to a hearing for more complex plans or issues.
- 2.7 The Examiner's role is limited to testing the submitted plan against the 'Basic Conditions' tests for neighbourhood plans set out in legislation, rather than considering its 'soundness' or examining other material considerations. It is the role of the local planning authority to be satisfied that a basic condition statement has been submitted, but it is only after the independent examination has taken place and after the Examiner's Report has been received that the local planning authority comes to its formal view on whether the draft neighbourhood plan meets the basic conditions. The basic conditions are met if:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
- The making of the neighbourhood plan contributes to the achievement of sustainable development
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations<sup>1</sup>
- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan<sup>2</sup>
- The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017<sup>3</sup>.

2.8 At this stage (Regulation 16) of the development of the Headcorn Neighbourhood Plan, the Borough Council is also a statutory consultee and can submit comments on the plan during the consultation for consideration by the Examiner.

2.9 During the preparation of the plan, the Council has offered advice and support to the Parish Council on matters such as the neighbourhood planning process, the evidence base, the plan's regard to national policy, and general conformity with the strategic policies of the Maidstone Development Plan.

#### Headcorn Neighbourhood Plan contents

2.10 The Headcorn Neighbourhood Plan is set out in 10 main chapters. It broadly comprises an introduction to the plan; a scene setting description of Headcorn and its surrounds; a future vision for Headcorn parish; and planning policies and guidance organised around thematic topic areas. There are also appendices with additional information.

2.11 The neighbourhood plan contains 6 planning policies covering a range of thematic topic areas, as follows:

- HNP Policy 1: Design policy for Headcorn
- HNP Policy 2: Siting, landscaping and protecting the natural and historic environment and setting
- HNP Policy 3: Connectivity and access
- HNP Policy 4: Infrastructure provision
- HNP Policy 5: New dwellings

---

<sup>1</sup> For example, the need for a Strategic Environmental Assessment and/or Habitats Regulation Assessment

<sup>2</sup> This applies to the need for an Environmental Impact Assessment for certain development proposals, and is not applicable to the Headcorn Neighbourhood Plan

<sup>3</sup> This Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018



- NHP Policy 6: The economy – supporting business development in Headcorn.

2.12 Section 5 of the Neighbourhood Plan includes Design Guidance for Headcorn, and supplements Policy HNP1: Design Policy for Headcorn. The guidance is wide ranging covering topics including local character; building materials; scale, space, layout and orientation; visual interest; building heights; boundary treatment; heritage and conservation; amenity; public realm; parking; and utilities connections.

#### Summary of Maidstone Borough Council response

2.13 Maidstone Borough Council's response to the Regulation 16 consultation on the Headcorn Neighbourhood Plan is included as Appendix 1 to this report.

2.14 The response is organised in two main parts. The first part is set out as a narrative with overarching comments on the plan and legal requirements. It highlights the change in the local planning policy context that has occurred since the Regulation 14 consultation on the pre-submission version of the Headcorn Neighbourhood Plan was undertaken. Specifically, the adoption of the Maidstone Local Plan Review (LPR) 2021-2038 on 20 March 2024. This is important as the adopted LPR contains the strategic policies that the neighbourhood plan must be in general conformity with, in order to meet the Basic Conditions. The second part of the response provides a schedule of detailed comments on specific sections, paragraphs and policies of the plan which expand on the first part.

2.15 Overall, the representation reflects concerns with specific elements of the plan which, as currently drafted, are not considered to be in general conformity with the adopted Local Plan Review. The principal concern is that these elements would preclude new development from coming in otherwise appropriate locations. This includes development in the countryside, in zones of flood risk and gypsy and traveller accommodation. In addition, there are detailed comments on certain provisions in the plan on specific policy matters, such as affordable housing and development density, which should be revised for conformity with national and local planning policies. It is noted that the Parish Council is aware of the adopted Local Plan Review, and it considers the Neighbourhood Plan to be in general conformity with the strategic policies contained within the LPR, as set out in their Basic Conditions Statement.

2.16 Without modification, the Headcorn Neighbourhood Plan is considered by the Borough Council to fail to meet the Basic Conditions for neighbourhood plans. Consequently, the representation seeks modifications to the neighbourhood plan, to address identified conformity issues. The Examiner will conclude on the matter and make recommendations accordingly.

2.17 Furthermore, whilst it is a matter for the Parish Council to decide what it wishes to include in the neighbourhood plan, and the level of specificity of the plan policies, the representation requests that the Examiner consider whether there are opportunities available to maximise opportunities for delivering sustainable development locally. For example, by considering

whether there is scope to strengthen policies dealing with climate change adaptation and resilience.

- 2.18 Finally, minor proposed modifications are intended to correct errors and achieve clarity.

---

### **3. AVAILABLE OPTIONS**

- 3.1 Option A: To not make representation on the Headcorn Neighbourhood Plan. The consultation is being run in accordance with the requirements of national legislation, but there is no requirement for the Council to submit a representation on the Neighbourhood Plan. However, to follow this option means that the Council's overall view as the local planning authority is not asserted. This approach would compromise the Council's opportunity to inform the Examiner of its position on the plan.
- 3.2 Option B: To approve the Borough Council's representation on the Headcorn Neighbourhood Plan, attached at Appendix 1.
- 3.3 Option C: To make changes to the consultation response (Appendix 1) and submit the representation on the Headcorn Neighbourhood Plan, provided this is done prior to the closure of the consultation period.

### **4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

- 4.1 Option B is recommended. Subject to a neighbourhood plan passing the examination and being the subject of a successful referendum, it will form part of Maidstone's statutory Development Plan and used for planning decisions. This option affords an opportunity to inform the Examiner of the Council's position in respect of the Headcorn Neighbourhood Plan.

---

### **5. RISK**

- 5.1 The risks associated with this proposal, including the risks if the Council does not act as recommended, have been considered in line with the Council's Risk Management Framework. That consideration is shown in this report at Sections 3 and 4.
- 5.2 We are satisfied that the risks associated are within the Council's risk appetite and will be managed as per the Policy.

### **6. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK**

- 6.1 The Headcorn Neighbourhood Plan is subject to two rounds of public consultation. The first (Regulation 14) on a draft plan was undertaken by the Parish Council from 22 June to 14 August 2023 and the Borough Council made a representation. The comments received during consultation, together with the Parish Council's responses to the issues raised, are summarised in the Consultation Statement (Appendix 3 of this report) and

the plan has been amended as a result.

- 6.2 The current consultation (Regulation 16) is facilitated by the Borough Council, and all representations will be collated by the Borough Council and forwarded to the independent Examiner of the plan, together with the submission documents, for their consideration.

---

## **7. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION**

- 7.1 Examination of the Headcorn Neighbourhood Plan will be dealt with by written representations and/or a hearing, and Maidstone Borough Council is required to pay for the costs of the examination. Following the examination, the Examiner will issue their report and recommendations<sup>4</sup>. A report will be presented to this Committee outlining the Examiner's recommendations and seeking a decision on whether to move the plan to referendum<sup>5</sup>. If more than half of those voting in the referendum have voted in favour of the plan being used to inform planning applications in the area, the plan becomes part of the Maidstone Development Plan and will move forward to being made (adopted).

---

## **8. REPORT APPENDICES**

- Appendix 1: Maidstone Borough Council response to the Headcorn Neighbourhood Plan Regulation 16 consultation.
- Appendix 2 – Headcorn Neighbourhood Plan (submission version)
- Appendix 3 – Consultation Statement
- Appendix 4 – Basic Conditions Statement
- Appendix 5 – Map identifying the area to which the proposed neighbourhood plan relates

---

## **9. BACKGROUND PAPERS**

None.

---

<sup>4</sup> Following a successful examination, a neighbourhood plan becomes a significant material consideration in decisions on planning applications within the neighbourhood area (Neighbourhood Planning Protocol).

<sup>5</sup> Once a decision is made to move to referendum, a neighbourhood plan has significant weight in decision making for the neighbourhood area.

Strategic Planning  
Maidstone Borough Council

Date: DD/MM/YYYY

**By email only**

Dear Sir/Madam

**HEADCORN NEIGHBOURHOOD PLAN 2022-2038**

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

**Consultation period 24 June to 12 August 2024**

Thank you for the opportunity to make representations on the Headcorn Neighbourhood Plan Regulation 16 'submission' version.

Maidstone Borough Council (MBC) recognises the key role that neighbourhood planning plays in the borough. It enables communities to shape the future of their local areas whilst helping to meet local needs, such as for new and affordable homes, jobs, community facilities and green spaces. We will continue to engage positively with and support parish councils and neighbourhood forums during the preparation of their plans so that these have the best chance of succeeding at examination and can be brought into force. Our aim is to ensure that all neighbourhood plans support the delivery of sustainable development in the borough, by meeting the Basic Conditions prescribed by legislation<sup>1</sup>, and we submit these representations in that context.

Headcorn parish was designated a neighbourhood area on 8 April 2013. Headcorn Parish Council is the qualifying body responsible for leading on the preparation of a neighbourhood plan for the designated area. The Parish Council undertook an early stage, 6-week public consultation on a 'pre-submission' version of the Headcorn Neighbourhood Plan (Regulation 14 stage) from 22 June to 14 August 2023. MBC formally submitted representations at that time. The Parish Council has since amended the draft plan having regard to all representations received from the consultation and this revised plan comprises the 'submission version' (Regulation 16 stage).

---

<sup>1</sup> The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004

MBC has published a Neighbourhood Planning Protocol which sets out actions that it will take in supporting parish councils and neighbourhood forums at different stages of the plan process. In line with the protocol, officers have undertaken a review of the plan process to-date and the submission documents. Officers are satisfied that public consultation on the pre-submission neighbourhood plan was carried out in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations, as amended. Officers are also satisfied that Regulation 15 requirements on the submission of the neighbourhood plan and supporting documents have been met. Furthermore, Natural England, Historic England and the Environment Agency have confirmed through their Regulation 14 stage representations that a Strategic Environmental Assessment and/or Habitats Regulation Assessment is not required. In light of the above, it is considered appropriate to proceed to the next stage of the plan process.

Whilst MBC is responsible for facilitating the Regulation 16 stage publication consultation on the submission Headcorn Neighbourhood Plan (which runs from 24 June to 12 August 2024), it is also a statutory consultee and has therefore taken the opportunity to submit representations on the plan, which are set out below.

### **General comments**

Overall, we commend the Parish Council for its efforts in reaching this stage of the neighbourhood planning process, and for submitting a plan which is clearly articulated and well-written.

There has been a significant change in the local planning policy framework since the Regulation 14 public consultation on the pre-submission Headcorn Neighbourhood Plan was undertaken. Specifically, Maidstone Borough Council adopted the Local Plan Review 2021-2038 (LPR) on 20 March 2024. One of the Basic Conditions for neighbourhood plans is that they must be in general conformity with the strategic policies contained in the Development Plan for the area of the authority, which in this case, includes the LPR.

We set out below where we have concerns with respect to general conformity with the LPR. These concerns are principally that the plan, as currently drafted, will preclude certain types of new development from coming forward in appropriate locations, consistent with the LPR. We therefore make comments and recommendations to assist in ensuring that the plan meets the Basic Conditions, and in doing so, provides a positive framework for facilitating sustainable development and is not unduly restrictive. Specifically, key conformity issues are raised with respect to Policies LPRSP6 (Rural Service Centres), LPRSP9 (Development in the countryside), LPRSP10 (Housing delivery), LPRSP10(B) (Affordable housing), and LPRSP14(C) (Climate change). There are also concerns with the approach to infrastructure funding and therefore general conformity issues are raised with Policy LPRSP13 (Infrastructure Delivery).

In addition, the Neighbourhood Plan broadly seeks to treat all types of residential development similarly, including gypsy and traveller accommodation. There are concerns that this approach is not consistent with the Government's Planning Policy for Traveller Sites and could also undermine Policy LPRSS1 (Maidstone Borough Spatial Strategy) in planning positively to meet identified needs of this group. It is noted that Policy LPRHOU8 (Gypsy, Traveller and Travelling Showpeople) sets the borough-wide policy for managing development of this nature on a case-by-case basis, and though not a strategic policy, should be referred

for consistency of approach where additional neighbourhood plan policies are to be considered. MBC notes that it is in the process of preparing a Gypsy, Traveller and Travelling Showpeople Development Plan Document, which will set out further policies on this matter.

Notwithstanding the above, it is noted that the Neighbourhood Plan should be updated throughout with factual corrections to make clear where references are made to the adopted LPR and to remove references to the Local Plan 2017 and its contents, which has now been superseded.

Furthermore, there are concerns that there is insufficient evidence to justify some of the policies contained within the plan. Whilst the Neighbourhood Plan has been informed by research and public consultation (including residents’ surveys, outcomes of which are frequently cited in the supporting text), there are instances where we consider there to be insufficient technical evidence to justify the policy approaches. These are signposted in the detailed comments.

Finally, where appropriate, we set out below suggested amendments to the Neighbourhood Plan which, though not matters of the Basic Conditions, could assist in strengthening the plan’s alignment with the adopted LPR and aid with policy implementation.

It is noted the preparation of the Neighbourhood Plan was largely undertaken when the Local Plan 2017 was extant and prior to the adoption of the LPR. We acknowledge that the Parish Council has endeavoured to take account of the emerging LPR, however recognising it had not yet come into force. Notwithstanding this, we would seek that the plan examiner considers whether there are opportunities available to maximise opportunities for delivering sustainable development locally, for example, by strengthening policies dealing with climate change adaptation and resilience.

In light of the above, modifications to the Neighbourhood Plan are considered necessary, so that it can meet the Basic Conditions and set a positive framework for delivering sustainable development locally.

**Detailed comments**

We set out below further detailed comments referring to specific sections, paragraphs and policies within the submission plan.

<b>Page no.</b>	<b>Paragraph/ Policy no.</b>	<b>Representations</b>
13	Box 1.1	This text box sets out a detailed programme for the next steps in the neighbourhood plan process. Whilst acknowledging this has been included as an informative for the public, it is now dated and does not reflect current circumstances. For example, the timescale for Examination in June/July 2024 will not be achievable given that the Regulation 16 public consultation will close 12 August. It is suggested that Box 1.1 is amended to refer to the key stages only, or alternatively, amended with updated the dates, as appropriate.
28	4.1	This paragraph states “all plans should set out a clear design vision and expectations”. For clarity, it is recommended that the policy is reworded

<b>Page no.</b>	<b>Paragraph/ Policy no.</b>	<b>Representations</b>
		along the following lines: "all planning applications submitted should set out a clear design vision and expectations..."
28	4.4	For clarity and to aid plan implementation, it is suggested that this paragraph makes specific reference to Policy HNP1 (Design Policy for Headcorn).
30	Section 5 - Design guidance	It is recommended that additional informative text is included within this section to make clear that the design guidance section is not to be taken as policy for the purpose of planning decisions.
29	HNP Policy 1	HNP Policy 1.C sets out that new development within the parish will be permitted if the development is sympathetic to the setting of a heritage asset. MBC considers there is a general conformity issue with Policies LPR6, LPRSP14(B) and LPRENV1 (which MBC highlighted in its Regulation 14 response). MBC recommends the HNP Policy 1 would benefit from the inclusion of text to recognise the scope for the conservation and enhancement of heritage assets and their setting.
84	HNP Policy 2	HNP Policy 2 deals, at various criteria, with development in or affecting the countryside. The policy is not considered to be consistent with NPPF paragraph 186 and not in general conformity with Policy LPRSP9. It is recommended that the policy is amended to reflect the key test in LPRSP9, which assesses whether development will result in 'significant harm' to the rural character and appearance of the area. This would ensure the policy is positively worded and does not preclude new appropriately located and well-designed development from coming forward in the countryside.
84	HNP Policy 2	HNP Policy 2.2 refers to HNP Policy Map 12: Key views in and around Headcorn Village. It is suggested that further clarification is included within to the policy to identify the views that should be protected and those views that could be improved. This would aid in the implementation of the policy.
84	HNP Policy 2	HNP Policy 2.11 addresses flood risk management. There is a consistency issue with the NPPF and general conformity concern with Policy LPRSP14(C). It should not be for the Parish Council to determine where flood risk is an issue, as set out in the policy; rather this should be informed by the latest technical evidence, such as Environment Agency flood risk maps, and information/advice issued by the lead local flood authority for the authority area. Furthermore, the policy should respond to Government policy and guidance on the appropriate locations for different types of development, in accordance with the sequential and exception tests. For instance, the policy indicates that no development will be permissible in Flood Zone 3b, whereas the NPPF/PPG provides that essential infrastructure may be appropriate in Zone 3b subject to the exception test being satisfied.
86	HNP Policy 2	HNP Policy 2.15 is considered to be overly onerous in seeking to ensure that development is avoided in locations which are more than 200 metres of at least two established dwellings. This approach is not considered to be consistent with the NPPF nor in conformity with LPRSP6 and LPRSP9 in setting a positive framework for facilitating development in this area. It is recommended that policy refers instead to adverse impacts on local character, including the countryside, having regard to relevant higher-level policies.
91	HNP Policy 3	It is recommended that HNP Policy 3.3 be amended to be more positively worded and to provide greater flexibility for design solutions that may

Page no.	Paragraph/ Policy no.	Representations
		enable development to come forward, where appropriate. For example, the criterion could emphasise that development should be designed to connect to the existing highway network, whilst seeking to avoid the need to cross additional field boundaries, so to ensure there will be no adverse impacts on local character.
91	HNP Policy 3	It is not entirely clear what HNP Policy 3.10 is seeking to achieve or how it will be implemented effectively. This may be a matter of wording and discussion with the Parish Council, which can be explored through the examination.
100	HNP Policy 4	HNP Policy 4.A sets out proposed car parking standards. The justification for this approach is included in the policy supporting text, however much of the evidence relies on visitor surveys and is also heavily focussed on commuter parking, with limited technical evidence for the proposed residential parking standards. MBC seeks to ensure that that the approach to parking is sufficiently justified. It is recommended that HNP Policy 4.A is amended to align with LPRTR4; and whilst this is not a strategic policy for neighbourhood plans, it will help to ensure consistency in the approach to managing car parking provision and sustainable transport across the borough. In particular, the LPR reflects the evidence-based approach applied by Kent County Council, including the KCC Interim Guidance Note 3 (IGN3).
101	HNP Policy 4	To aid policy implementation, it is suggested that HNP Policy 4.B be amended to refer to Fibre to the Premises (FTTP) to align with the accepted industry terminology and that used in the LPR.
101	HNP Policy 4	HNP Policy 4.B.1 should be amended to remove reference to 'British Telecom' in order to ensure the policy is responsive to potential future changes in infrastructure providers.
103	HNP Policy 4	It is unclear how HNP Policy 4.D.1 will be implemented. It proposes that the energy performance of applications will be assessed against that of 'standard properties of the type proposed'. The wording of this part of the policy is vague, and it is unclear what 'standard properties' would be used as a comparative benchmark in planning decisions. Overall, the policy would benefit from clearer standards against which developments can be assessed. For clarity, reference could be made to Policy LPRSP13(C), a strategic policy, along with Policy LPRQD1 which sets out borough-wide sustainable design standards. It is noted that MBC is currently in the process of preparing a Design and Sustainability DPD which will provide further detailed policies on this topic area.
103	HNP Policy 4	HNP Policy 4.E sets out priorities for infrastructure spending in Headcorn. Whilst MBC does not have an objection to the inclusion of a priority list for infrastructure spending within the plan, the policy should be amended to make clear that this list is specific to the neighbourhood proportion of Community Infrastructure Levy (CIL) receipts passed to the Parish Council. It is important that this list is not conflated with or otherwise undermines the Borough Council's strategic approach to infrastructure funding, including the use of CIL and planning contributions, as provided by Policy LPRSP13. The LPR approach to infrastructure funding is supported by a significant amount of technical evidence, such as the Infrastructure Delivery Plan and Integrated Transport Strategy. Approaches to prioritising funding, including in the neighbourhood plan, should be robustly supported by evidence.



<b>Page no.</b>	<b>Paragraph/ Policy no.</b>	<b>Representations</b>
106	Para 9.10	This paragraph sets out a definition of self-build housing for Headcorn. It is recommended that this paragraph is amended to refer to and/or align with the legal definition of self-build housing set out in legislation (i.e., the Self-build and Custom Housebuilding Act 2015, as amended by the Housing and Planning Act 2016).
119	HNP Policy 5	HNP Policy 5.I.(I.I).iv should be amended to align with LPRENV2 (Change of use of agricultural land to domestic garden land). This will help to ensure it reflects national planning policy considerations on safeguarding the open, rural character of the countryside, including by having regard to the best and most versatile agricultural land.
119	HNP Policy 5	HNP Policy 5.I.(I.2) sets out density standards for new residential development. It provides for a guideline minimum density of 15 dwellings per hectare (excluding 'micro developments') and a maximum density of 30 dwellings per hectare. MBC has concerns that these thresholds may preclude new development from coming forward to meet identified housing needs, including needs for the neighbourhood area, in accordance with Policy LPRSP10. It is noted that Policy LPRHOU5 sets out a minimum standard of 30 dwellings per hectare at sites within or adjacent to Rural Service Centres, which includes Headcorn.
119	HNP Policy 5	HNP Policy 5.I.(I.3) is considered to be too restrictive in enabling development to come forward within the Headcorn Rural Service Centre and is therefore not in general conformity with Policy LPRSP6. Specifically, it sets out exceptions to the location and types of development that may be permissible outside of site allocation policies, and these do not accord with those requirements set out in the LPR.
120	HNP Policy 5	HNP Policy 5.II.(II.5) sets out requirements on affordable housing tenure mix, with priority given to affordable home ownership (at a 50% target for this tenure type). This is not in conformity with Policy LPRSP10, which sets a target of 75% for social / affordable rented and 25% intermediate or affordable home ownership. The LPR policy has been informed by a robust Strategic Housing Market Assessment.
120	HNP Policy 5	HNP Policy 5.III 9 sets out a threshold for the number of units (25) permissible for residential development outside of site allocation policies. It also includes a size threshold for community self-build projects (9 units). It is not clear how the threshold numbers have been derived and the extent to which they are underpinned by technical evidence; whilst the policy supporting text provides justification and narratives around local character, with some housing delivery statistics included, it also relies heavily on resident survey and agent survey information. MBC also has concerns that the threshold approaches may preclude appropriately located and well-designed development from coming forward within Headcorn in order to meet identified housing needs.
129	HNP Policy 6	HNP Policy 6.C effectively requires that funding must be provided to restore land where development involving commercial energy generation has ceased or equipment has become redundant. It is not clear how this policy can be implemented effectively.
130	Glossary	The definition of 'Community Self-build Scheme' should be amended to align with the legal definition set out in legislation.
131	Glossary	The definition of 'Dwelling' should be amended having regard to the distinction with accommodation types set out in the Government's Planning Policy for Traveller Sites.

<b>Page no.</b>	<b>Paragraph/ Policy no.</b>	<b>Representations</b>
132	Glossary	The definition of 'Gypsy and Traveller Pitch' should be amended to align with that set out in the Government's Planning Policy for Traveller Sites.
142	Appendix 2	The Appendix should be updated to reference the strategic policies contained within the adopted Local Plan Review, rather than those in the Local Plan 2017, which has been superseded.

Yours faithfully,

**Karen Britton**

**Head of Spatial Planning and Economic Development**

**Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent ME15 6JQ**

**01622 602008 [www.maidstone.gov.uk](http://www.maidstone.gov.uk)**

# HEADCORN MATTERS

## HEADCORN PARISH NEIGHBOURHOOD PLAN: 2022-2038



ISSUED BY: HEADCORN PARISH COUNCIL  
2024 – REGULATION 16 CONSULTATION

# CONTENTS

<b>1.</b>	<b>Introduction</b>	<b>8</b>
1.i	What is a Neighbourhood Plan?	9
1.i.a	Process for adopting a Neighbourhood Plan	9
1.ii	Why introduce a Neighbourhood Plan for Headcorn?	10
1.iii	What does Headcorn’s Neighbourhood Plan cover?	11
1.iii.a	What isn’t covered by Headcorn’s Neighbourhood Plan	12
1.iv	Next steps	13
1.v	Acknowledgements	13
<b>2.</b>	<b>Setting the scene – Headcorn Parish</b>	<b>15</b>
2.i	Headcorn’s landscape and setting	16
2.ii	The history of Headcorn	18
2.ii.a	The history of the built environment	20
<b>3.</b>	<b>Vision for Headcorn’s Neighbourhood Plan</b>	<b>23</b>
3.i	Creating a Vision for Headcorn’s Neighbourhood Plan	23
3.i.a	Creating policy objectives to support the Vision	26
<b>4.</b>	<b>Design Policy for Headcorn</b>	<b>28</b>
<b>5.</b>	<b>Headcorn Design Guidance</b>	<b>30</b>
5.i	Local context – characteristics of developments in Headcorn	30
5.i.a	Design	32
5.i.b	Use of local building materials	35
5.i.c	Scale, spacing, layout and orientation	38
5.i.d	Creation of varied and visually interesting schemes	42
5.i.e	Height	46
5.i.f	Boundary treatments	47
5.ii	Heritage and Conservation Area	49
5.iii	Being good neighbours	54
5.iv	Exterior Spaces	54
5.v	Street scape – maintaining Headcorn’s sense of place	57
5.v.a	Scale, width, layout and materials	57
5.v.b	Street furniture and signage	60
5.v.c	Trees and hedges	62
5.vi	The practicalities	63
5.vi.a	Parking	64
5.vi.b	Bins and storage provision	67

5.vi.c	Connecting to utilities	67
<b>6.</b>	<b>Siting, Landscaping and protecting the natural and historic environment and setting</b>	<b>69</b>
6.i	Historic setting	69
6.ii	Views	69
6.iii	Green spaces	72
6.iv	Environment, habitats and landscaping	75
6.iv.a	Definitions of Key habitats	76
6.iv.b	Flood risk	79
6.v	Development in the countryside	83
<b>7.</b>	<b>Connectivity and access</b>	<b>87</b>
<b>8.</b>	<b>Infrastructure provision</b>	<b>92</b>
8.i	Parking	93
8.ii	Provision of broadband	95
8.iii	Water and sewerage management	96
8.iv	Promoting energy efficiency	98
8.v	Priorities for infrastructure spending	98
8.v.a	Priorities for public realm improvements, such as road safety	98
8.v.b	Priorities for open spaces	99
<b>9.</b>	<b>Dwellings – Housing and gypsy and traveller provision</b>	<b>105</b>
9.i	Density	105
9.ii	Additional siting considerations for new dwellings	107
9.ii.a	Development in the countryside	109
9.iii	Mix of dwellings	112
9.iii.a	Affordable housing and homes for emerging households	113
9.iv	Size of development	116
<b>10.</b>	<b>The economy</b>	<b>122</b>
10.i	Supporting business development in Headcorn	122
10.ii	Promoting the role of Headcorn High Street	123
10.iii	Headcorn Aerodrome	125
10.iv	Commercial energy generation	126
	<b>Appendix 1: List of abbreviations and definitions</b>	<b>130</b>
	<b>Appendix 2: The Making of Headcorn’s Neighbourhood Plan</b>	<b>136</b>
A2.i	Background to Headcorn’s Neighbourhood Plan	136
A2.ii	Next steps	140

A2.ii.a The basic conditions for Headcorn’s Neighbourhood Plan	141
A2.iii Headcorn’s Evidence Base	142
A2.iii.a 2021 Residents’ survey	143
A2.iii.b 2015 Residents’ Survey	143
A2.iii.c 2013 Residents’ Survey	143
A2.iii.d Headcorn Survey of Businesses, 2013.	144
A2.iii.e Headcorn Estate Agents’ Survey, 2013.	144
A2.iii.f Traffic surveys.	144
A2.iii.g Survey of Headcorn Primary School, 2014.	144
A2.iii.h Feedback sessions	145
A2.iii.i Position statements	145
A2.iii.j Analysing the overall sustainability of housing development in Headcorn	145
A2.iii.k Sustainability appraisal of possible strategic development sites in Headcorn	145
A2.iii.l Headcorn foul drainage assessment	146
<b>Appendix 3: References</b>	<b>147</b>

<b>LIST OF HEADCORN NEIGHBOURHOOD PLAN POLICIES</b>	
Vision for Headcorn	23
HNP Policy 1: Design policy for Headcorn	29
HNP Policy 2: Siting, landscaping and protecting the natural and historic environment and setting	84
HNP Policy 3: Connectivity and access	91
HNP Policy 4: Infrastructure provision	101
HNP Policy 5: New dwellings	119
HNP Policy 6: The Economy - supporting business development in Headcorn	128

## **LIST OF HEADCORN NEIGHBOURHOOD PLAN MAPS**

HNP Policy Map 1: Designated Neighbourhood Area for Headcorn Parish	8
HNP Policy Map 2: Low Weald Landscape of Local Value	9
HNP Policy Map 3: Headcorn’s position relative to local urban centres	15
HNP Policy Map 4: Map of Geology of Kent	17

HNP Policy Map 5: Evolution of Headcorn’s housing stock before 2015	22
HNP Policy Map 6: Land between Moat Road and Church Walk – historic Headcorn	39
HNP Policy Map 7: The Chantry – a good example of scheme layout	40
HNP Policy Map 8: The Hardwicks – a bad example of scheme layout	41
HNP Policy Map 9: The countryside North of Headcorn village	42
HNP Policy Map 10: Headcorn’s Conservation Area and Article 4 Directions	52
HNP Policy Map 11: Proposed new Headcorn Conservation Area and Article 4 Directions Land	53
HNP Policy Map 12: Key views in and around Headcorn village	71
HNP Policy Map 13: Important green spaces and wildlife corridors in Headcorn village	74
HNP Policy Map 14: Tithe map of Headcorn from early 1800s	76
HNP Policy Map 15: Map of Cumulative Impacts Assessment of potential for development to increase flood risk for third parties in Headcorn	82
HNP Policy Map 16: Connectivity within Headcorn Village	88
HNP Policy Map 17: Traffic pinch points within Headcorn Village	89
HNP Policy Map 18: Map of accessible natural green space (ANGSt) in Maidstone Borough	100
HNP Policy Map 19: Built up area of Headcorn village	106
HNP Policy Map 20: Headcorn Village Boundary	108

## **LIST OF FIGURES**

Figure 1: Examples of Headcorn’s rural setting	18
Figure 2: The Parish Church of St Peter and St Paul	19
Figure 3: Examples of Headcorn’s historic architecture	20
Figure 4: Headcorn as a community	24
Figure 5: A typical countryside scene in Headcorn Parish	27
Figure 6: Foremans - the changing face of Headcorn	28
Figure 7: Examples of developments that capture the village feel	32

Figure 8: Examples of the different treatment of upper and lower storeys	33
Figure 9: A good example from Headcorn High Street	34
Figure 10: Examples of the type of local building materials typically used in walls in Headcorn	36
Figure 11: Kent peg tiles are the dominant local roofing material	37
Figure 12: The roof line on the High Street	43
Figure 13: Two good examples – The Chantry and The Willows	44
Figure 14: A poor example – the Hardwicks	45
Figure 15: A successful modern addition to the housing stock	46
Figure 16: Aerial photograph of Headcorn from the 1970s	47
Figure 17: Examples of typical boundary treatments in Headcorn	48
Figure 18: Examples of boundary treatments that are out of keeping	49
Figure 19: The old and the new – Headcorn Primary School and Library	50
Figure 20: Tallow Court provides opportunities for both residents and wildlife to enjoy	55
Figure 21: The Hazelpits development – an example of poorly thought out green space	56
Figure 22: An example from the High Street of using parking spaces to slow traffic	58
Figure 23: Access to the rear of properties on Headcorn High Street from Forge Lane	59
Figure 24: A successful example of integrating street furniture into a scheme from the Foremans Centre on Headcorn High Street	60
Figure 25: Good examples of signage for commercial purposes	61
Figure 26: Examples of signposts and street signs with a rural feel	62
Figure 27: Examples of country lanes and roads in Headcorn Parish	62
Figure 28: Maintaining links with the countryside – examples of rural village roads	63
Figure 29: Forge Lane – an example of solving several practical issues at once	64
Figure 30: Examples of good parking design options	66
Figure 31: Handling practicalities – the bins	67
Figure 32: A bad and good example of integrating and visually screening utility infrastructure and equipment – the Hardwicks and Ulcombe Road	68



Figure 33: Integrating solar panels within roofs is visually more attractive than post construction bolt on options	68
Figure 34: A view of Headcorn’s rural setting from the Greensand Way	70
Figure 35: Examples of key aspects of Headcorn’s environment	78
Figure 36: Examples of flood events in Headcorn village and surrounding countryside from 2021	80
Figure 37: Examples of typical rural developments in Headcorn Parish	83
Figure 38: Good examples of footpaths linking developments to the main link roads in Headcorn village	87
Figure 39: How are services and infrastructure rated in Headcorn?	92
Figure 40: The use of road markings to reinforce speed limits	99
Figure 41: Land between the Smarden Road and Love Lane – 1940, 2008, 2011 and 2021	110
Figure 42: Tenure preferences amongst emerging households in Headcorn	114
Figure 43: Preferred size of property amongst emerging households in Headcorn, 2021 Residents’ Survey	114
Figure 44: Preferred development size	116
Figure 45: Remembrance Day parade on Headcorn High Street	123
Figure 46: Headcorn Aerodrome	125
Figure 47: View towards Headcorn church from Moat Road - the topography means that features such as pylons can be visually intrusive	126

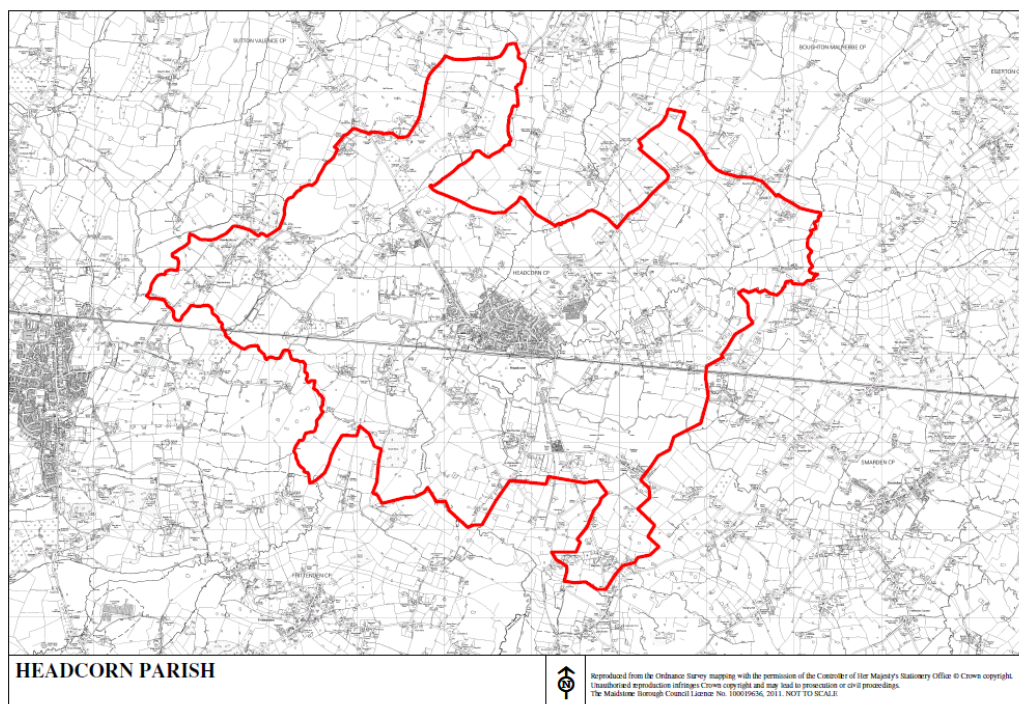
## **LIST OF TABLES**

Table 1: Weekly cost of travel by public transport from Headcorn	94
--	----

# 1. INTRODUCTION

**1.1** This draft Neighbourhood Plan has been issued by Headcorn Parish Council and covers Headcorn Parish. HNP Policy Map 1 shows the boundary of Headcorn Parish, which is the designated neighbourhood plan area for Headcorn.

## HNP Policy Map 1: Designated Neighbourhood Area for Headcorn Parish



**Source:** Ordnance Survey

**1.2** Headcorn is a thriving, rural parish in the Low Weald of Kent, which is centred on the village of Headcorn. It is located within Maidstone Borough, which is the relevant Local Planning Authority, but also borders the Boroughs of Ashford and Tunbridge Wells.

**1.3** Headcorn village is designated as a Rural Service Centre in the Maidstone Borough Local Plan, which was adopted in 2017, as well as in the emerging Local Plan. Outside of the Maidstone town centre and urban area, Rural Service Centres are seen as the most sustainable settlements in Maidstone's settlement hierarchy.

**1.4** Reflecting its high landscape value, the adopted and emerging Maidstone Borough Local Plans also designates the majority of Headcorn Parish, including the village of Headcorn itself, as part of the Low Weald Landscape of Local Value, see HNP Policy Map 2.

## HNP Policy Map 2: Low Weald Landscape of Local Value



**Source:** Adopted Maidstone Local Plan (2017).

### 1.i What is a Neighbourhood Plan?

**1.5** A Neighbourhood Plan is a plan prepared by a Parish Council or neighbourhood forum for a designated neighbourhood area. They are designed to allow local people to shape how development within their communities takes place. There is no set format for what a Neighbourhood Plan should look like or what sort of policies it should include, and since they were introduced Neighbourhood Plan policies have taken many different forms. However, an important element of a Neighbourhood Plan is that it should shape and direct development that is outside the strategic policies contained in the Local Plan adopted by the Local Planning Authority for the area. As part of this Neighbourhood Plans can, but do not have to, also allocate sites for development.

**1.6** Once adopted, a Neighbourhood Plan is used to determine planning applications in the area covered by the plan and becomes part of the Development Plan for the area, with the same legal status as the Local Plan produced by the Local Planning Authority. Although it is not compulsory to introduce a Neighbourhood Plan, it provides a potentially powerful tool for local communities to ensure they get the right type of development.

**1.7** Neighbourhood Plans are therefore an important part of the National Planning Policy Framework (NPPF) and were introduced as part of the Localism Act (2011). In law a Neighbourhood Plan is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act (2004).

#### 1.i.a Process for adopting a Neighbourhood Plan

**1.8** The process for developing and adopting a Neighbourhood Plan includes: a consultation and decision on the designation of the Neighbourhood Plan area; evidence gathering; a decision on the need for a Strategic Environmental Assessment; two formal consultations (a Regulation 14 Consultation, followed by a Regulation 16 Consultation); an examination; and a referendum.

**1.9** The reason for the examination is to determine whether or not a proposed Neighbourhood Plan meets the relevant legal criteria. For a Neighbourhood Plan to pass examination its policies have to be deliverable and need to meet certain basic conditions. In particular, a Neighbourhood Plan must:

- Have regard to national policies, including the NPPF itself, and advice contained in guidance issued by the Secretary of State;
- Ensure the Neighbourhood Plan contributes to the achievement of sustainable development;
- Ensure the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority; and
- Ensure the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations.<sup>1</sup>

**1.10** Assuming it passes its examination, a Neighbourhood Plan then also needs to pass a referendum of voters in the designated area. In other words, the proposed plan needs to receive over 50% of the votes cast.

**1.11** Once a Neighbourhood Plan has successfully passed a referendum, then the Local Planning Authority (in this case Maidstone Borough Council) needs to decide formally whether the Plan should be Made. Once it is Made, a Neighbourhood Plan becomes part of the Development Plan for the area and is used to determine planning applications.

## **1.ii Why introduce a Neighbourhood Plan for Headcorn?**

**1.12** Neighbourhood Plans are designed to give communities a voice on what gets built in their area. The aim of the Headcorn Neighbourhood Plan is to ensure that development in both the village and the wider parish maximises the benefits to the existing community, as well as to businesses operating within Headcorn Parish. In particular the Plan aims to:

- influence the look and feel of new developments, to try and ensure that they integrate well with their surroundings;
- ensure that any new development is supported by the right type of infrastructure, which recognises the particular needs and constraints of those working and living in the Parish;
- ensure that there is an appropriate level of protection for the things that the local community values; and to
- influence where and what development takes place.

**1.13** An additional benefit of introducing a Neighbourhood Plan is that, under current rules, areas that have an adopted Neighbourhood Plan are eligible for a higher share of the Community Infrastructure Levy (or CIL) associated with development in their area. This

---

<sup>1</sup> See Appendix 2 for details of the Basic Conditions associated with Headcorn's Neighbourhood Plan. The list of conditions set out in paragraph 1.9 are the key conditions that apply to all Neighbourhood Plans and are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004. Additional conditions also apply where Neighbourhood Plans are used to grant planning permission, which is not the case for Headcorn's Neighbourhood Plan. In addition to the basic conditions set out above, Neighbourhood Plans must also meet the prescribed conditions and comply with prescribed matters.

means that as well as potentially shaping the type of infrastructure associated with new development, the local community also gets more money to spend on the infrastructure it wants.

### **1.iii What does Headcorn's Neighbourhood Plan cover?**

**1.14** Headcorn's Neighbourhood Plan is designed to meet the needs and aspirations of local residents, as well as to support local businesses to ensure that Headcorn's economy will thrive. To ensure that it will achieve its aims, development of the Plan has been underpinned by a significant programme of evidence gathering, including most recently the Regulation 14 Consultation conducted between June 22<sup>nd</sup> and August 14<sup>th</sup> 2023, and a survey of residents conducted in early 2021.<sup>2</sup> This evidence gathering has been designed to identify the aspirations of local residents, as well as key constraints, in order to determine where policy intervention will be most effective. The resulting policies reflect this evidence.

**1.15** Headcorn's Neighbourhood Plan contains a Vision setting the overarching strategy for what the Plan is trying to achieve, namely that Headcorn will continue to thrive as a friendly, rural community, evolving gradually over time and supported by the right infrastructure. This Vision is supported by six policies in total. Four of the policies apply to all development, including housing, gypsy and traveller, commercial and community development. These are:

1. A Design policy for Headcorn, supported by Design Guidance, which sets the overall framework governing the look and feel of developments in Headcorn, and rules to ensure that new developments will be good neighbours;
2. A policy on siting, landscaping and protecting the natural and historic environment and setting, which sets the rules to determine how developments sit within the landscape;
3. A policy on connectivity and access, which is designed to ensure that developments are safe and well-connected, and recognise particular constraints in Headcorn; and
4. A policy on infrastructure provision, which sets the rules to ensure that specific types of infrastructure provision such as parking, broadband, water and sewerage, and promoting energy efficiency will meet the needs of local residents both now and in the future, as well as to set the priorities for infrastructure in Headcorn, reflecting local constraints.

**1.16** In addition to these four overarching policies, there are two policies that cover specific types of development:

5. A policy on new dwellings, which covers both housing and gypsy and traveller pitches. This policy addresses issues such as where different types of development can be located and what the mix of provision should be in larger developments; and finally

---

<sup>2</sup> See Appendix 2 for details of both the history of Headcorn's Neighbourhood Plan and the evidence that has been gathered to support its making.

6. A policy on the economy, which covers the rules governing all business development, as well as specific rules designed to support the success of Headcorn High Street, and rules governing any future development of the Headcorn aerodrome and commercial energy generation.

**1.17** The decision to apply the same rules on issues such as siting and connectivity to gypsy and traveller pitches as to other forms of dwellings reflects three factors: the desire to be fair, with the same rules applying to all parts of the community; the fact that caravans and other mobile or temporary dwellings make up a relatively high proportion of dwellings in Headcorn, meaning their impact on the built environment in Headcorn can be significant; and the fact that the same policy considerations apply, meaning the chosen approach avoids needless repetition.<sup>3</sup>

**1.18** The period covered by Headcorn's Neighbourhood Plan runs from 2022 to 2038. This period ensures it has the same end point as Maidstone's emerging Local Plan (covering 2021 to 2038), which was submitted for examination in March 2022.

### ***1.iii.a What isn't covered by Headcorn's Neighbourhood Plan***

**1.19** One of the themes that emerged in the 2021 Residents' Survey was a desire for the Neighbourhood Plan to allocate sites explicitly for development. Headcorn Parish Council considered this as a policy option and discussed the issue with Maidstone Borough Council in October 2021. Maidstone Borough Council pointed out that it was in the process of revising its Local Plan, and that as part of this process it would look at allocating additional sites for development in Headcorn that would meet any identified housing need for Headcorn. Maidstone Borough Council expressed concern that if Headcorn Parish Council were also to allocate sites through the Neighbourhood Plan process, then this could lead to potential conflicts between the two plans. In addition, the allocations for Headcorn within the adopted 2017 Maidstone Local Plan already address the identified housing need of 423 homes for the Parish, and combined with windfall development, mean that there is already planning consent for more than 500 homes in Headcorn, which significantly exceeds that identified need.

**1.20** For this reason Headcorn Parish Council made a decision not to allocate sites as part of the emerging Neighbourhood Plan. Instead it will seek to influence development indirectly, by sharing its evidence on local preferences with Maidstone Borough Council. It will also use the policies within the Neighbourhood Plan to: shape the look and feel of individual developments; determine what infrastructure is needed to support them; ensure that the approach to connectivity and access recognise local priorities; and help influence where any windfall development might take place.

---

<sup>3</sup> The 2021 Census showed that caravans and other mobile or temporary dwellings made up 3.0% of Headcorn's housing stock, compared to 0.4% for England as a whole.

## 1.iv Next steps

**1.21** Headcorn Parish Council was advised by Maidstone Borough Council on 10<sup>th</sup> May 2023 that a formal Strategic Environmental Assessment was not needed in the case of Headcorn’s Neighbourhood Plan.<sup>4</sup>

**1.22** Headcorn Parish Council is therefore issuing this draft Neighbourhood Plan as the basis of Headcorn’s Regulation 16 Consultation, which is the next stage in the process. Headcorn Parish Council is keen to hear views from residents, local businesses and developers, as well as the Statutory Consultees, on both the overall shape of the plan and the specific policy proposals, to help ensure that the plan will meet the needs of both residents and local businesses.

**1.23** Box 1.1 sets out the draft timetable for adoption of Headcorn’s Neighbourhood Plan.

### **Box 1.1 Timeline for Headcorn’s Neighbourhood Plan: Next Steps**

- 1.** March/April 2024: Maidstone Borough Council to assess if Headcorn’s Neighbourhood Plan meets the basic conditions and add the draft to their website for comments (6 week period over April/May 2024).
- 2.** June/July 2024: Examination
- 3.** August/September 2024: Referendum
- 4.** September/October 2024: Maidstone Borough Council decides whether Headcorn’s Neighbourhood Plan should be made
- 5.** October/November 2024: Headcorn’s Neighbourhood Plan is adopted for use in planning decisions

## 1.v Acknowledgements

**1.24** Headcorn Parish Council would like to thank everyone who helped in the production of the Headcorn Neighbourhood Plan. In particular, we would like to thank all the members of the Headcorn Matters Team, both past and present, with particular thanks to Dave Andrews, Caroline Carmichael, Rebecca Driver, Chris Haynes, Hilary Hosford, Michael Jefferys, James Ker, Lyn Selby and Tim Thomas.

**1.25** We would also like to thank all the volunteers who helped with the residents and business surveys, and all the parishioners and business people who responded to the surveys and consultations, attended open meetings or just provided comments and

---

<sup>4</sup> This advice is based on the emerging policies in Headcorn’s Neighbourhood Plan, and on their discussions with the statutory consultees.

feedback. We would like to thank Jane Armstrong for her help publicising our consultations and surveys.

**1.26** We would like to thank the officers and members of Maidstone Borough Council and Kent County Council, who helped inform the drafting of the Plan. We would also like to thank all the people and organisations, whose input helped inform work on Headcorn's Neighbourhood Plan, including Riki Therivel of Levett-Therivel; Brian Whitely of Planning Aid; Kevin Harris; Irene Seijo and the team at Design South East; and Sanderson Associates (Consulting Engineers) Ltd.

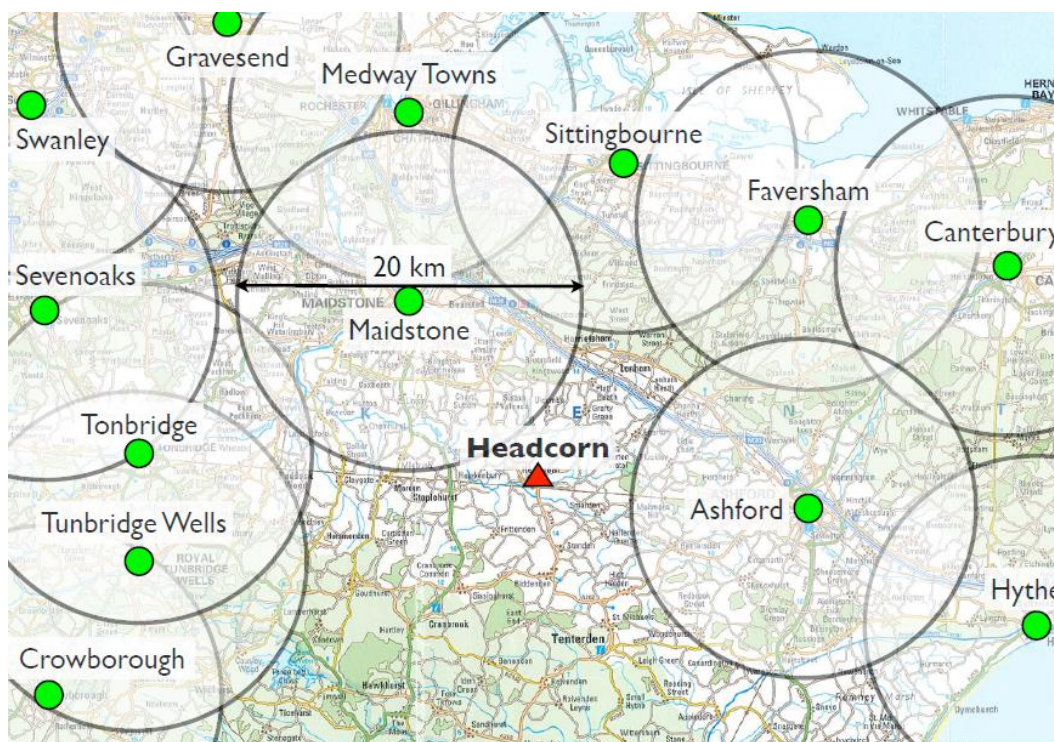
**1.27** Finally we would like to thank Dr Rebecca Driver at Analytically Driven Ltd for her help drafting this Plan, as well as her 2014 Sustainability Analysis.



## 2. SETTING THE SCENE – HEADCORN PARISH

**2.1** Geographically, Headcorn is located in the south east of Maidstone Borough, on the borders with Ashford and Tunbridge Wells boroughs. The village of Headcorn is over 10km from all the major population centres in Kent, see HNP Policy Map 3. Therefore, in geographic terms, Headcorn is relatively far from all the major employment centres - almost 50% of workers in England travel at most 5km to work and almost 70% travel at most 10km to work, but Headcorn is 15.9km from Maidstone, the nearest population and employment centre.<sup>5</sup>

### HNP Policy Map 3: Headcorn's position relative to local urban centres



**Note:** Each of the employment and population centres surrounding Headcorn (defined as having a population of at least 10,000) is marked with a green dot and the surrounding rings mark the 10km radius that would be within a normal commuting range for the majority of workers. As it can be seen, Headcorn is relatively far away from all the key surrounding employment centres. Headcorn is a 15.9km drive from the closest employment centre, Maidstone. Calculations based on the 2021 Census results for all workers in England travelling to a fixed workplace show roughly 44% of commuters lived within 5km of their workplace and around 65% lived within 10km of their workplace. For Maidstone Borough as a whole, 27.3% and 58.9% of workers travelling to work lived within 5km and 10km of their workplace respectively. In the case of Headcorn Parish only 16.5% of workers travelling to work in 2021 lived within 5km of their workplace, and only 31.5% of workers lived within 10km of their workplace.

**2.2** The emphasis in Headcorn's Neighbourhood Plan is on maximising local opportunities and supporting the needs of local people and businesses. This is in part informed by Headcorn's location, which means that commuting times, distances and costs are all significantly above the national average. For example, Headcorn is at least a 30-minute drive from the nearest population centre of at least 10,000 people, which is significantly

<sup>5</sup> The 2021 Census recorded that in total for England 43.7% of workers with a fixed workplace travel at most 5km to work, with 65.4% travelling at most 10km. Therefore, compared to the experiences of the vast majority of workers, 15.9km (the distance between Maidstone and Headcorn) would not be considered close to work.

higher than average commuting times in England.<sup>6</sup> Although Headcorn does benefits from a direct rail link to London, there is no direct rail link from Headcorn to Maidstone, which is the closest population centre. However, there is an irregular bus service between Maidstone and Tenterden that stops in Headcorn. Again though, compared to average commuting times in England of 24.5 minutes, travel times from Headcorn by public transport to any of the main employment centres are mostly significantly above average.<sup>7</sup> For example, journeys to London by train from Headcorn take between 55 minutes to reach London Bridge Station and roughly an hour and ten minutes to reach Charing Cross station. It also takes around 40 minutes to reach the centre of Maidstone by bus from Headcorn. This may explain why the 2021 Census showed that a higher proportion of commuters in Headcorn drove a car or van to work (77.5%) compared to Maidstone as a whole (72.7%).

**2.3** Despite, or possibly because of, its relative distance from local centres, Headcorn benefits from a range of good services, including: a popular primary school; a doctor's surgery; three dentists; a Village Hall; a library; a variety of shops, restaurants, pubs and cafes; and several churches.

**2.4** However, Headcorn lacks easy access to a secondary school. The closest government funded secondary school is Lenham School, which is 11.1km from the centre of Headcorn. The second closest, Cranbrook School, is not only 11.6 km from the centre of Headcorn, but also has an 8.5km catchment area meaning pupils from Headcorn do not qualify. To put this in context, this means pupils in Headcorn aged 11 to 18 need to travel longer distances than the majority of working adults. They also have to travel far further than is typical for the vast majority of pupils - for England as a whole, 90% of pupils travel at most 6.6 km to school, and even in rural areas 90% of pupils travel less than 9.4 km.<sup>8</sup>

## **2.i Headcorn's landscape and setting**

**2.5** Headcorn is a rural parish covering 2125 hectares in the scenic Low Weald of Kent. The Low Weald is recognised as a National Character Area by Natural England. Its geology consists largely of Wealden Clay (see HNP Policy Map 4). There are also deposits of three safeguarded land-won minerals that are found in Headcorn Parish, including on land immediately surrounding Headcorn village. The rules governing the management and protection of these deposits are set out in the Kent Minerals and Waste Local Plan (KMWLP).<sup>9</sup>

---

<sup>6</sup> England does not have a definition of 'remote', but Headcorn would qualify as remote under the definition of remote used by the Scottish government and both the travel times and distances between Headcorn and major population centres are significantly above average commuting times and distances. See the discussion of the implications of this for sustainability in Driver (2014).

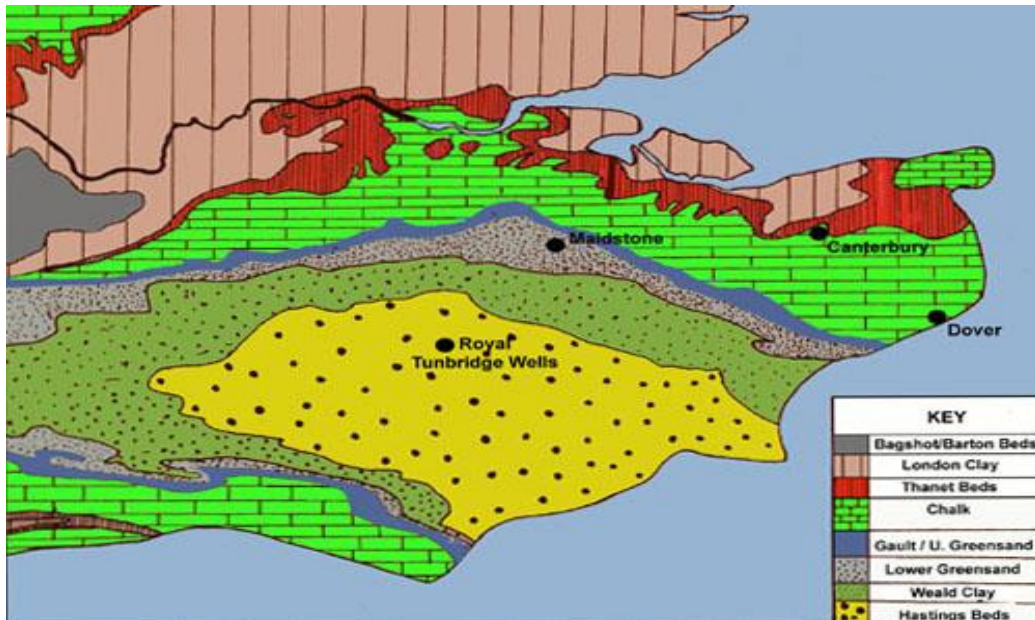
<sup>7</sup> Manning and Petrongolo (2017), based on Labour Force Survey data for 1993-2007.

<sup>8</sup> Burgess et al (2006).

<sup>9</sup> See <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/housing,-regeneration-and-planning-policies/planning-policies/minerals-and-waste-planning-policy/kent-minerals-and-waste-local-plan-kmwlp> for details of the mineral safeguarding policies applying to Headcorn Parish. Reference to the need to abide by the relevant KMWLP policies has not been included within the policies of Headcorn's Neighbourhood Plan, because mineral extraction policies are excluded development for Neighbourhood Plans, meaning there is a legislative requirement for Neighbourhood Plans to avoid policies covering mineral extraction and safeguarding. Nonetheless the relevant policies within KMWLP should inform decisions with respect to planning applications in Headcorn.

**2.6** The Low Weald is a unique landscape area, characterized by small, pretty villages and a countryside consisting of numerous farms, with small fields and ancient hedgerows, in addition to small woodland, or copse areas. Headcorn is very much part of this rural landscape, with most of the roads within the village maintaining a sense of being country lanes and benefiting from the presence of ancient trees and hedgerows.

#### **HNP Policy Map 4: Map of Geology of Kent**



**2.7** Agriculture, incorporating both farming and fishing, remains an important part of Headcorn's economy. In keeping with Kent's reputation as the garden of England, agricultural activity within the Parish is extremely varied.

**2.8** The village of Headcorn itself is surrounded on three sides by streams and rivers, including the River Beult, which runs to the south and is designated as a Site of Special Scientific Interest (SSSI). Flood risk is the main reason why Headcorn village has developed in the direction it has and why it has retained a relatively compact shape. Overall, at the time of the 2011 Census, the built-up area of the village covered 79 hectares.

**Figure 1: Examples of Headcorn's rural setting**



**Note:** Clockwise from the top: view from Headcorn railway bridge; view of the fields close to the village; cattle rearing; sheep grazing; view of an oast house across the fields; an apple crop ready for picking; and preparing the fields for the year ahead.

## **2.ii The history of Headcorn**

**2.9** Headcorn is believed to have originated in the days of the Kingdom of Kent as a den or clearing, to which pigs were driven from the northern parts of the County to feed on acorns and beech mast in the Wealden Forest. The earliest written records are references in charters of King Wihtrud and King Offa, respectively, to Wick Farm, in 724; and Little Southernden, in 785.

**2.10** The early development of Headcorn was linked to the church, rather than a feudal overlord. Although Headcorn does not appear in the Domesday Book of 1086, the Domesday Monachorum, the ecclesiastical survey made at about the same time, records the existence of a Church at Hedekaruna. Records show that Henry of Ospringe was appointed the first Rector of Headcorn in 1222. In 1239 the King gave the den of Headcorn, with the rectorial endowments, to the Maison Dieu at Ospringe. In 1516, following the dissolution of the monasteries, St John's College, Cambridge was given the Maison Dieu properties.

**Figure 2: The Parish Church of St Peter and St Paul**



**2.11** Although there are few archaeological discoveries from Headcorn dating earlier than the medieval period, such discoveries are not unknown. Several prehistoric artefacts, in the form of stone or bronze axes and axe heads, and iron age coins, have been found in the parish. In addition, a mid to late bronze age vessel in a pit was discovered at Ulcombe Road in 2018 together with late iron age and Roman features, and a late iron age / Roman farmstead may have been found at Little New House Farm. Many of these discoveries, together with a wider review of the heritage and potential of Headcorn village, can be found in a historic town survey prepared by Kent County Council. All these sites, as well as others now lost, will have left an archaeological heritage that could be revealed either by research or during development. This archaeological heritage is also part of the wider heritage of the Neighbourhood Plan area.

## 2.ii.a The history of the built environment

**2.12** Headcorn's long history means that the village benefits from a significant architectural heritage. In 2022 the Kent County Council Historic Environment Record listed 207 sites of architectural or historic interest in Headcorn Parish. Listed buildings include the Parish Church of St Peter and St Paul (Grade I), situated at the western end of the High Street; Headcorn Manor (II\*); the Cloth Hall (II\*); and Shakespeare House (II). In the survey of residents in 2013 to inform Headcorn's Neighbourhood Plan, views of St Peter and St Paul's church, together with the neighbouring Parsonage Meadow, were consistently identified by residents as buildings, places or views that it was important to protect. The centre of Headcorn village is a Conservation Area and has kept much of its old charm, even though most of the shops and businesses have changed hands and use over the years.

**Figure 3: Examples of Headcorn's historic architecture**



**Note:** Clockwise from top left: houses on Headcorn High Street; and Headcorn manor; view of Headcorn Parish Church, St Peter and St Paul, and Church Walk; and Church Walk.

**2.13** In addition to heritage assets in Headcorn village itself, there are many other heritage assets in the Parish that are listed in the Historic Environment Record. These include at least five medieval moated sites, including the important site of Moatenden Priory. Moated sites are a site type of particular interest for the local community and worthy of conservation. These sites are characteristic of the Low Weald and many of the issues of setting and conservation identified in the Neighbourhood Plan apply to them. There are also approximately 70 historic farmsteads (identified as present on the 2nd edition Ordnance Survey map 1897-1900) that are also key heritage assets, reflecting Headcorn's rural history.

**2.14** The 2021 Census recorded 2029 dwellings in Headcorn Parish, an increase of 29.6% compared to 2011. There were 1849 households living in Headcorn Parish at the time of the 2021 Census, an increase of 26.7% compared to 2011. Of the occupied housing stock

in Headcorn in 2021, the largest segment (38.7%) is made up of detached dwellings. Semi-detached dwellings accounted for 31.5% of the housing stock and terraced housing 15.5%. Flats and maisonettes accounted for a further 9.4% of the occupied housing stock. Caravans or other mobile or temporary structures accounted for 3.0% of the housing stock in Headcorn Parish in 2021, compared to 1.2% in Maidstone and 0.4% in England as a whole.

**2.15** Data for the split between housing in the village compared the countryside in the Parish of Headcorn are not yet available for the 2021 Census. However, at the time of the 2011 Census just over 75% of Headcorn's household spaces were in the village of Headcorn itself, which was home to 1119 households. The built up area of Headcorn village was 79 hectares, meaning that there are 15.3 household spaces per hectare within the village.

**2.16** On average the housing stock in Headcorn is larger than the housing stock in the rest of Maidstone Borough. In 2021 70.7% of households in Headcorn were living in dwellings with at least three bedrooms, compared to 63.7% for Maidstone as a whole. Only 5.8% of households in Headcorn were living in a property with at most one bedroom, compared to 9.7% for Maidstone Borough as a whole.

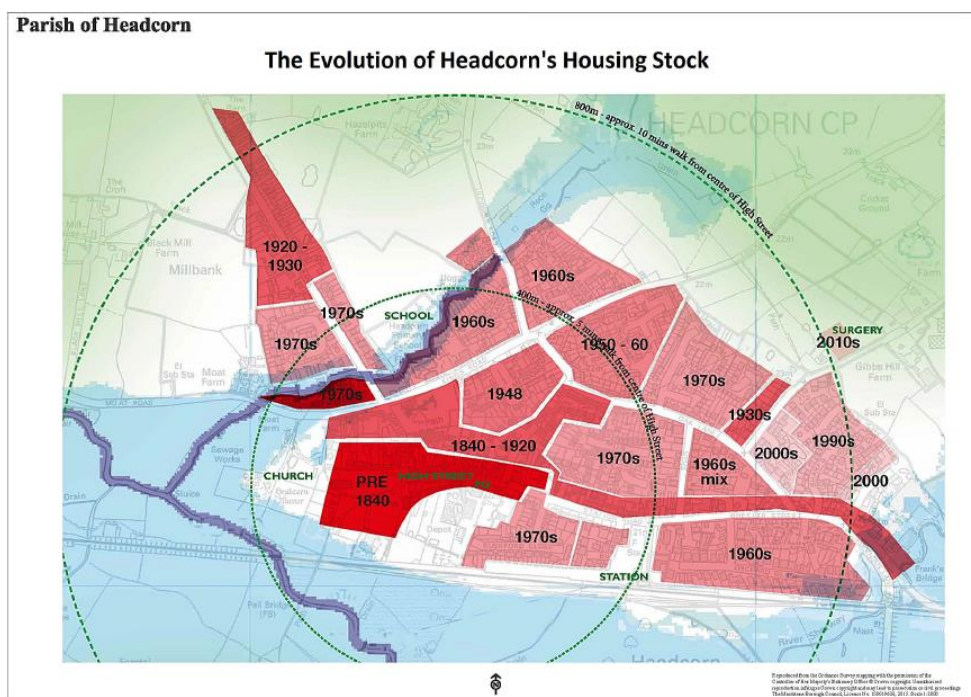
**2.17** At the time of the 2021 Census, the Parish of Headcorn was home to 4,277 people, or 2.4% of the total population of Maidstone Borough. In total there were 1,849 households living in Headcorn, giving an average of 2.31 people per household.

**2.18** Headcorn's population is older on average than the population of Maidstone as a whole, with 24.5% of the population in 2021 aged 65 or over (compared to 19.1% for Maidstone as a whole) and only 22.1% aged 19 or under (compared to 23.1% for Maidstone as a whole).<sup>10</sup> This means that Headcorn can expect to see fewer emerging households than the Maidstone average, as well as accounting for a higher proportion of the properties that become vacant due to the death of the homeowner. Combined this means that proportionally over the plan period Headcorn's contribution to Maidstone's assessed housing need will be significantly lower than other parts of the Borough.

---

<sup>10</sup> In 2011, 28.4% of households in Headcorn were made up of individuals who are all aged 65 or over, compared to 20.9% for Maidstone as a whole. These data are not yet available for the 2021 Census.

## HNP Policy Map 5: Evolution of Headcorn's housing stock before 2015



**Note:** Image taken from a presentation by the Headcorn Matters Team to Headcorn residents in June 2014. Source: Kevin Harris

**2.19** As HNP Policy Map 5 shows, Headcorn's housing stock has largely evolved slowly over time, with occasional bursts in response to economic stimulus, such as the introduction of the railway in 1842 and the electrification of the rail links to London in the 1960s. The vast majority of this housing sits within a ten minute walk of the centre of Headcorn High Street. Since 2015 there has been another significant burst of housebuilding in Headcorn, reflecting the change in policy associated with the adoption of the Maidstone Borough Local Plan in October 2017, which included delivery of 423 new houses on six allocated sites. In practice, over 500 new houses have been given planning permission in Headcorn since 2015, an increase in the size of the village of over 40%.



### **3. VISION FOR HEADCORN'S NEIGHBOURHOOD PLAN**

**3.1** Headcorn's Neighbourhood Plan is underpinned by a positive Vision for Headcorn's future, supported by five high-level policy objectives, which should be used to guide development in the Parish. The Vision and the associated policy objectives flow from the evidence that has been gathered to support Headcorn's Neighbourhood Plan. Importantly, the Vision for Headcorn's Neighbourhood Plan is supported by the vast majority of residents in Headcorn.<sup>11</sup>

#### **Vision for Headcorn**

Our vision is for Headcorn to continue to thrive as a friendly, rural community with a strong local economy. We believe that Headcorn should evolve gradually over time in a way that, through appropriate choices of the scale and design of individual developments, preserves and enhances the distinctive character, landscape and setting of the village, while meeting the needs of local residents and businesses. This will be achieved by:

1. Maintaining a sense of being a country village, with a strong local community.
2. Supporting a vibrant local economy, based around the High Street, agriculture, leisure, tourism and small business enterprise.
3. Ensuring the village is supported by a robust infrastructure, designed to meet the needs of local residents and businesses.
4. Ensuring that there is a robust policy framework governing development in the countryside around Headcorn that will support both local needs and the benefits residents receive from being surrounded by beautiful countryside.
5. Ensuring that development in the Parish is managed in a way that is sustainable; promotes small scale development; is well designed; is capable of meeting the needs of local residents in different age groups and family units; and is in keeping with its setting.

#### **3.i Creating a Vision for Headcorn's Neighbourhood Plan**

**3.2** Identifying a Vision is an important part of any Neighbourhood Plan, as it is used to drive the policies within the Neighbourhood Plan, both individually and collectively. The key to getting this right is good evidence, taking a rigorous approach to identify what needs preserving and what big changes are needed. Headcorn's Neighbourhood Plan has been informed by a large evidence base including analysis of sustainability and infrastructure issues, surveys of residents in 2013, 2015 and 2021, surveys of businesses, estate agents,

---

<sup>11</sup> In the 2021 Residents' Survey, 83% fully supported the Vision, with another 15% ticking maybe. In total, only 3% of those surveyed did not support this as a Vision for Headcorn.

and traffic movements, as well as a survey of the parents, teachers, pupils and governors at Headcorn Primary School. Drawing these together, there are a number of key findings.

**3.3** The first is a very positive one - Headcorn Parish is a great place to live. When residents were asked to rate living in Headcorn on a scale of 1 to 5 (where 5 was very good) 74% of residents rated Headcorn as either good or very good as a place to live in the 2021 Residents' Survey. While this represents a deterioration compared to the 2013 Residents' Survey, where over 85% of residents rated Headcorn as either good or very good, it still represents a positive view of Headcorn. The two things that residents value most about life in Headcorn are the fact that it is surrounded by beautiful countryside and the High Street.<sup>12</sup>

#### **Figure 4: Headcorn as a community**



**Note:** The May Fair celebrations at Days Green and the Remembrance Day parade in Headcorn, 2014.

**3.4** Headcorn Parish is also a good place to do business. Indeed, one of the reasons that Headcorn is successful as a village is that it also enjoys a thriving business community. When Headcorn Parish Council undertook a survey of the local business community in 2013, there were 143 businesses in Headcorn Parish and around one in three residents of working age also worked in the Parish.<sup>13</sup> When asked about how Headcorn compares as a place to do business, the business community was very positive, with the majority of business owners and managers rating Headcorn as either good or very good as a place to do business.<sup>14</sup>

**3.5** It is this positive view of the Parish that was one of the main motivating factors behind the decision by Headcorn Parish Council to introduce a Neighbourhood Plan. It is important that development in Headcorn maintains and enhances the benefits of Headcorn as a place

---

<sup>12</sup> These were both picked by over 75% of residents in the 2013 Residents' Survey.

<sup>13</sup> The evidence on one in three people working in the Parish is based on the 2013 Residents' Survey for Headcorn Parish. It is not possible to get a breakdown of the number of residents working in Headcorn Parish from the Census and working patterns were distorted in 2021 due to COVID. However, in the 2011 Census 10.9% of those in work in Headcorn Parish worked mainly at or from home and 16.3% of commuters in the Maidstone 017 Middle Layer Super Output Area (which include Headcorn Parish) lived and worked in the same area. Assuming the proportion of commuters living and working in Headcorn Parish is the same as the proportion in the Maidstone 017 Middle Layer Super Output Area as a whole, this would mean that 27.2% of Headcorn residents in employment worked in the Parish.

<sup>14</sup> Based on the 2013 Survey of Businesses in the Parish. In total 53% of businesses rated Headcorn as either good or very good and 33% rated Headcorn as average, with only 14% of businesses rating Headcorn as either bad or very bad.

to live and do business and that it will meet the needs of the whole community going forward. To do this, one of the key aims of Headcorn's Neighbourhood Plan is to recognize the challenges that expansion will bring and to plan strategically how to address these. So, looking to the future, what are the key messages that come out of Headcorn's evidence?

**3.6** Based on the 2013 Residents' Survey, twenty years from now, residents would most like Headcorn to be described as: friendly, rural, peaceful, traditional and prosperous (in that order). When asked about the opportunities associated with expansion, the need for housing, even affordable housing, did not feature. Out of 22 options, the top five from the perspective of residents were: ensure good medical facilities; protection for the countryside; boost local jobs and businesses; ensure good public transport links; and create a strong village identity. However, none of these options was picked by more than 45% of residents.

**3.7** In contrast, there was a much greater consensus about the issues that expansion could cause. Of the 22 options they were given, 67% picked "lose the sense of being a village". The next four biggest issues (in order of preference), each picked by over 30% of residents, were: development more suitable for a town than a village; overstretched sewerage system; increase in crime; and reduction in the amount of green space.

**3.8** This worry about losing the sense of being a village is also reflected in another key finding to emerge from all the survey evidence, including the most recent survey in 2021, which is the very strong preference for individual housing developments to be small scale. When asked how big individual housing developments should be, in the 2021 survey almost 80% of residents picked at most a maximum of 25 houses. In 2013 almost 90% of residents picked at most a maximum of 30 houses.<sup>15</sup> It is also supported by the views of local estate agents, who were surveyed as part of the evidence gathering undertaken in 2013 and who all felt that it became harder to sell properties in Headcorn in housing developments of more than 30 houses. Anecdotal evidence suggests that this concern was borne out in practice, as it took a long time for developers to sell the properties in the larger housing developments that were built in the village after 2015. This preference for smaller developments is in keeping with Headcorn's historic experience, as the largest development in Headcorn, dating from the 1970s, was around 80 houses. It is much harder to integrate a large housing estate into the fabric of the village.

**3.9** Combining this evidence, the vision for Headcorn's Neighbourhood Plan has at its heart the importance of maintaining a friendly, rural community, which will thrive because the approach to development will ensure that it can be easily absorbed within the local community, will enhance the character of the village and surrounding countryside and will help support the local economy.

---

<sup>15</sup> Note the scale for individual developments suggested in the two surveys differed. Reflecting development patterns at the time of the survey, in 2013 residents were given a choice of: at most 10 houses; 20 houses; 30 houses; 40 houses; 50 houses; and any size. In contrast, given recent large developments had changed how the village had evolved, in the 2021 Residents' Survey, residents were given the choice developments of: at most 10 houses; 25 houses; 75 houses; 100 houses; 150 houses; 200 houses; or any size. Despite these differences in the choices offered, the results were almost identical in terms of a very strong preference for small scale developments.

### **3.i.a Creating policy objectives to support the Vision**

**3.10** The Vision for Headcorn is underpinned by five high-level Policy Objectives, which provide a framework to inform the suite of policies in the Neighbourhood Plan. Each of the Policy Objectives covers a key aspect of development.

**3.11** The first Objective is probably the most important, which is that Headcorn wants to retain the sense of being a country village and to develop in a way that supports community engagement. In practice, when residents were asked what it meant to be a village, key aspects were that: the village should retain a compact shape; the Primary School should remain at the heart of the village and have the sufficient capacity to accept children from the Parish; individual developments should be small scale; roads should feel like narrow country lanes rather than wide city streets; there should be a single, vibrant retail centre (the High Street), with no shops in new developments; and that there should be lots of green spaces, big and small.

**3.12** The second Objective reflects the importance of the local economy for Headcorn, highlighted by the fact that roughly one in three residents in employment are based in Headcorn for work. Headcorn enjoys high levels of business ownership, with 22.0% of economically active residents in the parish being self-employed, compared to 14.0% for England as a whole. The choice of the sectors to place at the heart of economic development reflects the preferences of businesses, as well as the value that residents place on the High Street – 75% of residents picked the High Street as something they valued most about living in Headcorn, a score beaten only by being surrounded by beautiful countryside.

**3.13** The third Objective reflects the reality that infrastructure plays an important role in sustainable development. Although some parts of Headcorn's infrastructure are strong, both businesses and residents feel that certain key aspects of Headcorn's infrastructure are not currently fit for purpose and that development could lead to further deterioration. This means that the policy framework within Headcorn's Neighbourhood Plan needs to address this issue proactively.

**3.14** The fourth Objective reflects the importance of the countryside for the enjoyment that residents receive from living in Headcorn and the need to find a balance between that enjoyment and the needs of residents and businesses operating in the Parish, including the 23% of households living in the countryside surrounding the village.

**Figure 5: A typical countryside scene in Headcorn Parish**



**Note:** Preparing the fields for the year ahead against a backdrop of ancient hedgerows and a typical cluster of dwellings and outbuildings. Agriculture is an important part of Headcorn's economy.

**3.15** The final Objective covers the overarching approach to all development in Headcorn (including housing and commercial development). Aspects that are important here are that: it is small scale – almost 80% of residents want individual developments to be at most 25 houses; well designed; in keeping with its setting; is sustainable; and will meet the needs of existing residents and businesses.

## 4. DESIGN POLICY FOR HEADCORN

**4.1** As set out in the National Planning Policy Framework (NPPF), the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. Therefore, all Plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.

**4.2** Headcorn's Design Policy is set out below. It should be read alongside the Headcorn Design Guidance, which aims to highlight specific aspects of design that are unique or important to Headcorn and provide policy justification. Individual elements of Headcorn's design policy framework are reinforced in subsequent policies.

**4.3** The aims of the design policies in Headcorn's Neighbourhood Plan are:

- to create well-designed buildings, which will stand the test of time and be desirable both now and in the future;
- to preserve and enhance Headcorn's distinctive heritage and character; and
- to create development that is in keeping with Headcorn's position as a rural village; contributing to a high-quality built environment; providing sensitive landscaping; and reflecting its setting within the Parish.

**4.4** As Figure 6 illustrates, development can have a very positive impact on the built and man-made environment, enhancing its setting while still taking cues from the local vernacular. The aim of this Design Policy, together with the accompanying Design Guidance, as well as Headcorn's Neighbourhood Plan as a whole, is to ensure that new development will have a similarly positive impact throughout the Parish.

**Figure 6: Foremans - the changing face of Headcorn**



**Note:** Foremans, seen from the High Street in the 1980s and now

## **HNP Policy 1: Design policy for Headcorn**

This policy covers all development in Headcorn, including housing, gypsy and traveller, commercial and community development and should be read in conjunction with the Headcorn Design Guidance. New development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted where it:

A) Is designed to a high quality, which responds to the heritage and distinctive character of Headcorn and its rural environment and reflects the local context by way of:

- design;
- use of local building materials;
- scale, spacing, layout and orientation, and the sensitive choice of the way in which new buildings and structures relate to the road;
- the creation of varied and visually interesting schemes;
- height (which is typically no more than two and a half storeys); and
- the retention, and where feasible reinforcement, of the traditional boundary treatment of the area.

B) Is sympathetic to the setting of any heritage asset, and adheres to Conservation Area guidance where appropriate.

C) Safeguards the privacy and daylight of adjoining residents and will not result in unacceptable levels of light, noise, air, ground or water pollution.

D) Promotes high quality exterior spaces, appropriate to its rural setting.

E) Ensures that any new roads visually resemble traditional village streets and country lanes in keeping with the existing street scape, for example through:

- the appropriate choice of scale, width, layout and materials;
- ensuring that any street furniture, signage or electric vehicle charging facilities will be in keeping with Headcorn's rural location and will avoid creating a cluttered street scape; and
- the use and retention of mature native trees and hedgerows lining the road.

F) Deals with practicalities effectively and incorporates them into the scheme in a way that minimises their visual impact and avoids creating a cluttered streetscape. For example, by:

- ensuring that the spacing and screening of parking is designed to minimise its visual impact and to avoid creating the feel of an urban environment;
- providing adequate storage, such as refuse and recycling storage; and
- ensuring that the way that buildings are connected to utilities is effective, minimises its visual impact and supports future proofing.

## **5. HEADCORN DESIGN GUIDANCE**

**5.1** Achieving high quality places and buildings is a fundamental aim of any plan-making process, and the key to delivering successful outcomes is good design. Design also plays an important role in ensuring that development can support and enhance a sense of place, by taking cues from the surrounding area and building on what has been successful.

**5.2** This Design Guidance for Headcorn aims to work with the policies within Headcorn's Neighbourhood Plan, by providing guidance on the type of features that help define Headcorn's sense of place. It also provides examples that help illustrate where development in Headcorn has been either successful or less successful, in order to promote the types of positive design choices that will underpin successful development in the future.

**5.3** While the focus of design decisions will vary, depending on what is being proposed, the Design Guidance for Headcorn has been created to inform all development in Headcorn, including housing, gypsy and traveller, commercial and community development. The guidance covers different aspects of design, including the design of the scheme as a whole, the structures that sit within it, the type of street scape that it will produce, and the practical considerations that should be addressed in order to produce successful schemes. It should be read in conjunction with the Headcorn Design Policy HNP1 and is organised to reflect the structure of that policy.

### **5.i Local context – characteristics of developments in Headcorn**

**5.4** Headcorn is a historic village situated in the Low Weald of Kent and the wealth of historic buildings of different ages in the centre of the village reflects Headcorn's growth over the centuries. This history helps define Headcorn's unique character with its core of historic buildings, many listed, in the conservation area in the centre of the village (see HNP Policy Map 10) and around the Parish Church of St Peter and St Paul. There is widespread support for retaining the 'sense of a village' and maintaining the traditional character of the village in any new developments.

**5.5** The rich history of the built environment in Headcorn village is also reflected in the wider countryside, with many examples of old farmhouses, some dating back to the 15th century, throughout the Parish. In addition to the traditional farmhouses, there are a number of workers' cottages throughout the Parish, many dating to the Victorian period. More recently building in the countryside has tended to focus on barn and oast house conversions, and there are a number of successful examples of these within the Parish. Buildings in the countryside, including farm buildings, tend to be clustered in small groups and this is reinforced by the existence of several small hamlets within the Parish, including Bletchenden and Hawkenbury.

**5.6** The character of Headcorn Parish owes much to the variety of architectural forms and styles developed over hundreds of years. There are examples of timber framed hall houses from the 14th century, to tile hung and brick built properties with Georgian style windows



from the 18th century onwards. Bricks and tiles made from the local clay are much in evidence. Key features of Headcorn's style include:

- A varied roof scape, with a distinct local feel, created by the use of: steeply pitched roofs; hipped and half hipped roofs; different roof heights and building orientations within developments; and the extensive use of Kent peg tiles.
- Most buildings of two storeys, albeit with varying ridge heights, but the use of dormer windows in some properties to create 2.5 storeys;
- A mix of building styles, including: oak framed buildings; brick or tile hung elevations (some use of contrasting grey bricks for decoration) and mathematical tiles in different designs; weather boarding in white paint or black stain; Bethersden marble facades with brick detailing; and many buildings with brick chimney stacks.
- Well-proportioned windows, including examples of: Georgian sash windows; Victorian sash windows; bow windows; and cottage style casement windows.
- Roads, even in the village, which feel like country lanes; and small lanes and pedestrian footpaths connecting up different parts of the village. There is no clear pattern for how buildings relate to the road and there are successful examples of both houses that are set back from the road and houses that sit directly on the road, even within the context of the main road through Headcorn (the A274). Many of the successful examples of houses being set back involve the use of native hedges or other distinctive boundaries treatments, such as traditional picket fencing or low brick walls, combined with the creation of cottage gardens, which help preserve the rural feel.

**5.7** This diversity of building styles and use of materials (many derived from the local area) contributes greatly to the character of Headcorn. It is important that this diversity and use of local materials is retained when new development is planned. Headcorn residents strongly support the use of different sizes and styles of property to ensure this diversity, as well as to aid integration into the village.

**5.8** Future building should respect the distinctive height, scale, spacing, layout, orientation and materials of the area. Development should also be sensitive to location within the village. For instance, the High Street is the densest part of the village with terraces or closely packed housing. However, even on the High Street there are several substantial properties with large gardens.

**5.9** Innovative design should reflect design cues from its context within the Parish. In recent years there have been a couple of developments in the village which have taken account of Headcorn's character, using sensitive and appropriate building materials and styles and as a result have been more successful visually than many other new builds. These include the development of the former Foremans site in the heart of the village, which maintained the density appropriate to the centre of the village and took cues from its former agricultural use; and the Chantry scheme off Grigg Lane, which uses steeply pitched roofs, different heights of houses, styles and orientation, as well as having good parking management and limited use of hard landscaping to create a visually successful development.

**Figure 7: Examples of developments that capture the village feel**



**Note:** Clockwise from the top left: Church walk is part of the old part of the village, with houses of different shapes, styles and sizes creating a varied and traditional street scape; Tallow Court is a successful modern development, which benefits from good landscaping and a variety of designs; Foremans Walk in the heart of the village is a good example of the use of sympathetic design to help create a new development that complements the High Street following the replacement of the old grain silos; and The Chantry development picks up visual cues from traditional village developments such as Church Walk and uses landscaping and the positioning of the buildings to visually soften the development.

### **5.i.a Design**

**5.10** There are many different aspects to design that collectively and individually help contribute to a sense of place: the types of materials that are used; the scale, spacing, layout and orientation of buildings; the uniformity or variety of buildings; the height of buildings; and choices around the public realm. Each of these aspects is dealt with below. However, equally important to a sense of place are the elements of design that are linked to the shape and feel of the buildings themselves.

**5.11** There is significant variety in the historic buildings that make up the core of Headcorn village, as well as the surrounding countryside. However, there are also certain elements to building design that are common to buildings in Headcorn from different periods. It is these commonalities that help provide Headcorn's sense of place, and it is important that new developments look to incorporate them, in order to help ensure that new developments fit well within the landscape.

**Figure 8: Examples of the different treatment of upper and lower storeys**



**Note:** Clockwise from the top left: a jetty or overhang visible at Chequers on the High Street; a jetty or overhang visible at the George and Dragon on the High Street; use of white weather boarding on the upper storey on the Smarden Road; use of hanging tiles on the upper storey of a house on Church Walk; an example of a bay window with a continuous roof over the door at a house on Ulcombe Road; and bay windows on the shops on the High Street.

**5.12** One typical element seen in the design of buildings from different periods in Headcorn is differences in the external treatment of the ground floor compared to the upper storey. The form that these differences take varies, meaning it is the use of a different approach to the upper and lower storeys that is the key design element, rather than a specific treatment. Examples of the type of differences between upper and lower storeys typically found in Headcorn are:

- a jetty or overhanging upper storey. This treatment is typically found in some of the oldest buildings in the Parish. However, there are also more recent buildings, such as the George and Dragon pub on Headcorn High Street, that replicate this use of overhang;
- the use of bay windows on the ground floor, sometimes with the use of a continuous roof over the bay and door. Although, it is less common, this type of treatment is found, for example, in some of the old commercial properties on the High Street; and
- the use of different cladding for the upper and lower storeys, typically involving bricks on the lower storey and either timber cladding, or decorative tiles on the upper storey.

**5.13** Another important design feature is one of scale. Although Headcorn’s Conservation Area, for example, benefits from several substantial properties, particularly those dating from the medieval period, no individual property dominates the space or looms over its neighbours. This is achieved in part by the fact that buildings throughout Headcorn tend to be wider than they are taller and are at most two and a half storeys high. This means that while individual buildings may be substantial and give the impression of solidity, they also succeed in being relatively modest at the same time – essentially they are large farmhouse in scale, rather than stately home. This means that scale, particularly in relation to surrounding buildings, and ensuring that new additions do not overwhelm existing structures, should be an important element of any new development. Similarly the proportions of buildings, which are wider than they are high, as well as the associated height limits of no more than two and a half storeys are important contributors to Headcorn’s sense of place.

**Figure 9: A good example from Headcorn High Street**



**Note:** Although substantial, Chequers (on the left hand side of the picture) does not dominate its neighbours on the High Street. Its proportions help achieve this, including the fact that the body of the building is much wider than it is tall. In addition, the very substantial roof structure is typical of buildings in Headcorn from different periods.

**5.14** Another feature that is very much in evidence in historic buildings in Headcorn, and contributes to its sense of place, is the roof structures and particularly the fact that the roofs are often both steeply pitched and quite substantial in relation to the rest of the building. They also typically involve Kent pegged tiles. However, the choice of roof design itself is very varied, embracing hipped roofs, gable ends, dormers, crosswings and cat slide roofs, amongst others. This means that in order for developments to be in keeping with Headcorn's sense of place, they should look to priorities size, roofing material and variety, rather than a specific shape.

### **5.i.b Use of local building materials**

**5.15** Headcorn has a rich built environment that benefits from the use local materials and styles. In many cases building materials are used in combination, in order to create visual interest, for example, through the use of decorative patterns, or the different treatment of the upper and lower storeys.

**5.16** Many of the oldest buildings in the Parish are timber framed, with important examples of this using both natural and black stained timbers. As these largely predate the Tudor period, the use of timber framing is relatively simple, and lacks the close studding and decorative framing that became popular elsewhere in the 16<sup>th</sup> and early 17<sup>th</sup> centuries.

**5.17** Red brick made from local clay is another popular building material very much in evidence in historic buildings in Headcorn. These are typically laid using a Flemish bond. As well as the use of plain brick, there are also numerous examples of the use of the burnt grey ends of bricks, in combination with red bricks, to create patterns. There are also examples where bricks have been laid in herringbone patterns as an infill for timber framing. However, even in cases where simple red bricks have been used, these are rarely entirely uniform, creating a textured effect. While there are examples where the external brickwork has been painted, this is less common.

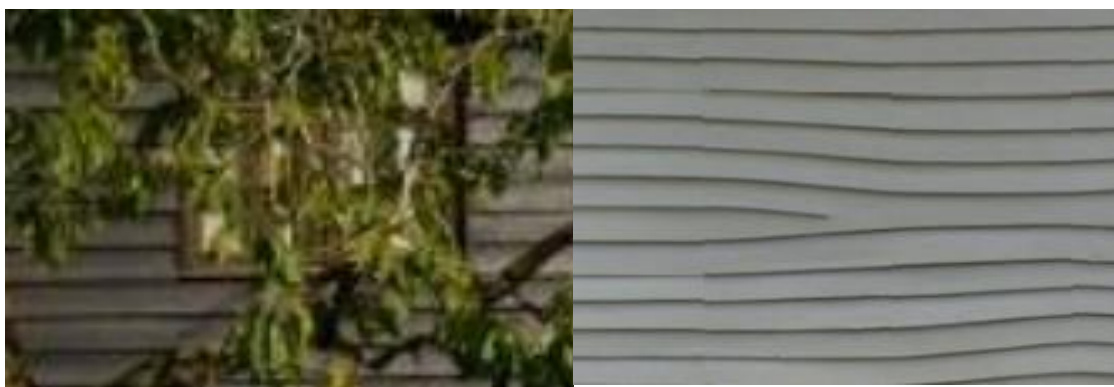
**5.18** As well as bricks, there are also several examples of buildings that are built entirely, or partly of the local stone, which is Bethersden marble.

**5.19** Red tiles, again made from local clay, are a popular choice of cladding material for the front of building and these can often be highly decorative, or combined in a way to create texture and patterns. Another popular choice of cladding material for buildings is timber. In domestic architecture this is often painted white.

**5.20** Similar styles and use of materials are in evidence in the countryside surrounding Headcorn village, as well as in the village itself. This includes examples of historic agricultural buildings. For example, the local oast houses are typically brick built, and there are also numerous historic examples of brick built barns and stables, including many involving detailed patterns. There are also a large number of timber clad barns that are clad in either natural or black stained timber.

**Figure 10: Examples of the type of local building materials typically used in walls in Headcorn**





**5.21** The variety of materials in evidence in and on the walls of historic buildings in Headcorn means there is no one dominant material that needs to be used, in order to help retain the sense of place. However, there are some rules that can be followed, such as the use of red brick, ideally from local clay, and the way in which materials are used to create visual interest and a textured finish. The sense of place will be helped by other design choices, such as the way in which the historic buildings often clearly differentiate between storeys, as well as the choice of roofing material, which is predominantly Kent peg tile.

**5.22** Although there are some examples of the use of slate in newer buildings, the vast majority of buildings throughout both the village and Headcorn Parish use Kent peg tiles (often handmade) as their roofing material. This is true both of domestic and agricultural buildings. The tiles in evidence on historic buildings are typically a darker shade and are rarely entirely uniform, and the result is that roof structures typically have a slightly speckled effect.

**Figure 11: Kent peg tiles are the dominant local roofing material**



**5.23** The continued use of Kent peg tiles as the dominant roofing material will be important for ensuring that Headcorn retains its sense of place, and ways should be found to recreate the slightly speckled effect on older buildings to ensure that newer additions feel as if they were meant to be there.

**5.24** Downpipes and guttering on historic buildings are typically in black. Again this should be replicated, where these features will be visible.

### ***5.i.c Scale, spacing, layout and orientation***

**5.25** Headcorn is a village that is made up of small scale developments, and has evolved gradually over time. Headcorn's Neighbourhood Plan aims to support and promote a continuation of this gradual evolution, based around small scale developments.

**5.26** In addition to the fact that most developments in Headcorn are small scale, key features of the layout of developments in the village include:

- a significant amount of green space, either of a private or public nature;
- developments that rarely encompass straight lines – even where buildings are close together, which can be observed in parts of the village centre, they are often at slightly different angles and orientations;
- roads and pathways are rarely straight;
- the use of pedestrian only routes;
- a range of different boundary treatments; and
- a mix of buildings that are different sizes and scales and could rarely be described as box-like.

**5.27** All these features can be observed in HNP Policy Map 6, which covers an aerial view of the area between Moat Road and Church Walk. This is one of the older parts of the village, and is made up of buildings largely dating from between the Medieval and Victorian periods. It includes a range of different types of properties, including: terraced housing on Church Walk and Gooseneck Lane; semi-detached properties on Moat Road; a range of detached properties throughout; and several commercial properties. The boundary treatments vary, ranging from hedges and picket fences enclosing front gardens, to properties that open directly, or almost directly, onto the public highway.



## HNP Policy Map 6: Land between Moat Road and Church Walk – historic Headcorn



**Source:** Google Earth. April 2020 © 2021 Maxar Technologies.

**5.28** It is this type of varied built environment that Headcorn’s Neighbourhood Plan is trying to promote and there are clear examples within the village of how this can be achieved successfully in a way that helps reinforce Headcorn’s sense of place. One example of this is the Chantry development off Grigg Lane, which dates to around 2006. An aerial view of the Chantry development is shown in HNP Policy Map 7.

**5.29** Visual examination of the Chantry development demonstrates why it is successful:

- The buildings have a range of different orientations and styles and cater for a range of different family groups and sizes;
- It includes a range of different types of property, from terraced housing to detached and semi-detached properties;
- The shape of the properties is varied, and very few could be described as box-like;
- The roof scape, which is varied and in Kent peg tiles clearly reflects the roof scape in older parts of the village;
- There are two areas of significant green space around local ponds, which are visually pleasing and benefit local wildlife, as well as small patches of greenery dotted around the front and sides of some of the properties, that help promote a green feel to the development;
- The road is curvy, rather than straight;
- Parking options are tucked out of sight, shielded by twists in the road the changing direction of individual properties; and

- The scheme includes an additional pedestrian access point through to Oak Lane

### HNP Policy Map 7: The Chantry – a good example of scheme layout



**Source:** Google Earth. April 2020 © 2021 Maxar Technologies.

**5.30** Further along Grigg Lane is another new development, the Hardwicks, which was built around 2013. The Hardwicks is an example of the type of development that Headcorn’s Neighbourhood Plan is seeking to avoid. The reasons for this can be seen from an examination of an aerial view of the scheme, which is shown in HNP Policy Map 8. In particular:

- The development is made up of straight lines, both in terms of the road itself, and how the buildings relate to both the road and to each other;
- The buildings are fairly boxy in appearance, with limited visual interest created through the use of varied shapes or orientations;
- There is very limited green space, particularly in the public parts of the development;
- The roof scape is predominantly slate, which is contrary to Headcorn’s sense of place;
- No attempt has been made to hide or shield parking, undermining how the properties relate to the road; and
- There is very high ratio of paved area in the scheme, which means it completely lacks any sense of being part of a rural landscape.

## HNP Policy Map 8: The Hardwicks – a bad example of scheme layout



**Source:** Google Earth. April 2020 © 2021 Maxar Technologies.

**5.31** Looking beyond the village itself, development in the countryside surrounding Headcorn village is characterised by small clusters of agricultural and domestic buildings, with significant gaps between individual developments, which allows views over the surrounding countryside. An example of this development pattern can be seen in HNP Policy Map 9, which shows the countryside north of Headcorn village and is typical of rural development in Headcorn. What this shows is that while the majority of the scattered rural developments are very green in nature, there are some developments that are made up almost entirely of hard standing, which is contrary to the rural nature of Headcorn Parish and should be avoided.

**5.32** Headcorn's Neighbourhood Plan is seeking to ensure that where development takes place in the countryside surrounding Headcorn Parish, it will aim to replicate existing development patterns, involving small scale developments involving clusters of buildings, with significant gaps between; limited use of hard standing; and boundary treatments that allow views over the countryside and are in keeping with their rural location.

## HNP Policy Map 9: The countryside North of Headcorn village



**Source:** Google Earth. April 2020 © 2021 Maxar Technologies.

### **5.i.d** *Creation of varied and visually interesting schemes*

**5.33** A key contributor to Headcorn's sense of place is variety. Therefore, however impressive an individual building may be, the introduction of a large number of identikit buildings, particularly in straight rows, would be directly contrary to Headcorn's sense of place. It is important therefore that all developments, but particularly larger developments, should be able to demonstrate how they will create varied and visually interesting schemes.

**5.34** A great example exemplifying how variety and visual interest form one of the key elements that make up Headcorn's sense of place is the High Street. Not only is there significant variety in the buildings themselves, including in the choice of building materials and cladding, but, as shown in Figure 12, the roof line illustrates that each building differs in its orientation, form and height. Even though individually each roof line may be straight, collectively they combine to create something that is both more organic and more dynamic in nature. It is this sense of variety and organic development that Headcorn's Neighbourhood Plan is seeking to replicate in new developments.

**Figure 12: The roof line on the High Street**



**5.35** Headcorn's High Street achieved this dynamic, organic and even slightly chaotic visual appeal because it was developed over time. New developments involving more than one building will need to work harder to do so. However, there are clear examples from recent developments that suggest it is possible to do so successfully. Two of these are the Chantry and The Willows.

**5.36** As can be seen in Figure 13, the roof line at the Chantry would be very much at home on Headcorn High Street, involving different angles and shapes. The buildings within the development are all orientated at different angles, around curving roads. As illustrated by the terraced housing pictured, in some cases even the floorplans of individual buildings do not use right angles. Each building has a different shape and feel, with significant differences in the choices of cladding and design that draw inspiration from the dominant building materials and shapes and form observed in historic buildings throughout Headcorn Parish. The development makes sensitive use of planting, both to give the development a significantly green feel, even in the depth of winter, and to help screen practical elements of the development such as parking. It also replicates the variety of boundary treatments that are found in the properties in Headcorn's historic core, with examples of properties opening almost directly onto the path, to properties with enclosed front gardens.

**5.37** The Willows development is much smaller than The Chantry, but is successful both because it makes use of similar design choices, but also contains design elements that are particularly suited to small developments on the rural edge of Headcorn village. For example, each of the buildings within the Willows development is orientated slightly differently, which is reinforced by the fact that the access road is gently curving. Each of the buildings displays different choices in terms of cladding, roof shape, and even roofing materials, but in each case they clearly draw inspiration from the building materials and styles seen elsewhere in the Parish. Practical elements like parking have been well thought out and designed to avoid creating a cluttered street scape with significant parking in front of individual dwellings. For example, there is a cut out areas within the green space at the front of the development to house parking. Like the Chantry, the Willows development is very green, but in the case of the Willows, this is reinforced by the retention of mature

trees and hedging at the entrance to the development. The retention of significant grassed area running down to the stream and the use of split chestnut fencing along the bank of the stream, almost gives the impression of a small village green.

**Figure 13: Two good examples – The Chantry and The Willows**



**5.38** At the other end of the scale, the Hardwicks development next to the Doctor's Surgery is a development that is very much out of keeping with Headcorn's sense of place. Although the development uses three different cladding options, as well as slight variations in the shape of the roofs and the treatment of the front elevation, these are repeated in a regular pattern. In addition, with the exception of the side elevations, the windows are all of an identical size and shape, and are all positioned in the same way, meaning each building seems almost identical. The result is that the overall impression is one of straight lines and sameness, with buildings that look as if they would be more suited to an urban,

rather than a rural environment. This sense that the Hardwicks development is out of place is reinforced by the choice of high fences; large expanses of hard standing, with the road visually merging into the pavements; and very limited greenery or green spaces. In addition the choice of slate as the dominant roofing material, with red tiles along the ridge of the hip, is also out of keeping the rest of Headcorn, where red clay Kent peg tiles dominate, with the occasional use of slate, rather than the other way round. These types of design choices should be avoided in future developments.

**Figure 14: A poor example – the Hardwicks**



**5.39** Although many of the examples of successful recent additions to Headcorn's built environment have built on the traditions of historical architectural styles, there are also some examples of successful additions that are unashamedly modern in style. One such example is a house located to the west of the A274, tucked behind more traditional housing stock. The use of a wedge shape makes it more dynamic than a simple box and ensures that the house follows the contours of the land. It also adds visual interest to what is otherwise a flat roof. The decision to use different materials to clad the upper and lower sections is in keeping with one of the key elements underpinning Headcorn's sense of place. In addition, the choice of natural wooden cladding on the upper layer echoes traditional cladding choices within the Parish and, combined with the decision to lay the cladding in vertically rather than horizontally, helps the building blend with the surrounding planting.

**Figure 15: A successful modern addition to the housing stock**



### **5.i.e Height**

**5.40** The height of buildings is another important aspect of design that helps provide a sense of place. In the case of Headcorn, with the exception of the Parish Church of St Peter and St Paul, all the buildings in Headcorn are very much on a domestic scale. The vast majority of buildings in Headcorn are typically no more than two and a half storeys high, and the Design Policy for Headcorn (HNP 1) seeks to ensure that this remains the case.

**5.41** The reason for this is vividly illustrated by the aerial photo of Headcorn from the 1970s, which is shown in Figure 16. With the exception of the church, all the buildings are of a very similar scale, and this is part of what creates the village feel. An aerial photo of the village taken today would produce an almost identical view.

**5.42** As well as a lack of buildings of more than two and a half storeys high, another feature of the older part of the village is that there are often slight variations in the height



of buildings that are next to each other, which helps create varied and visually interesting streetscapes. This is the type of typical Headcorn characteristic that the Headcorn Neighbourhood Plan is looking to encourage.

**Figure 16: Aerial photograph of Headcorn from the 1970s**



### **5.i.f Boundary treatments**

**5.43** Hedges are the dominant boundary treatment in use in Headcorn village, often with grass verges in front, even in the heart of the village on the High Street. Another typical boundary treatment very much in evidence is picket fences. Other examples of boundary treatments include low walls, fences or railings. With the exception of some hedges, however, a key element of all these boundary treatments is that they are low. Even in the case of the higher hedges within the village, these do not form an impermeable barrier.

**5.44** There are also examples of many historic buildings that open directly, or almost directly, onto the highway, without the need to cross any barriers in order to reach the building. This is particularly true for commercial buildings along the High Street, but there are also examples of this in domestic buildings.

**5.45** These boundary treatments are a key part of Headcorn's sense of place. They allow people to appreciate and enjoy the local architecture, and help maintain an open feeling within the village, which helps foster a sense of community by ensuring people are not fenced off behind impermeable barriers. It is important that boundary treatments for new developments reinforce these local patterns.

**5.46** In the countryside surrounding Headcorn village, hedges are by far the most prevalent boundary treatment, often with grass verges in front. Entry onto rural properties is typically through five barred gates, or equivalent, reflecting the need for farm and other vehicles to access properties.

**5.47** Again, reinforcing these typical boundary treatments for developments within the countryside surrounding the village will be important. Retaining hedgerows will help wildlife, and importantly will also foster a sense of openness, allowing people to see, or catch glimpses of, the countryside and architecture behind the hedge.

**Figure 17: Examples of typical boundary treatments in Headcorn**



**5.48** One example of less successful boundary treatments that should be avoided where possible is the use of chain linked fences. Even though these allow clear views into properties, and so help foster a sense of openness, they can jar compared more typical boundary treatments, by suggesting a more urban or suburban feel.

**5.49** Another example of boundary treatments that should be avoided is the use of tall, close boarded fences. These are directly contrary to the sense of openness that characterises Headcorn, which is what this Neighbourhood Plan is looking to reinforce. Tall fences block views and create a sense of the occupants being fenced off from the rest of

the community. They are also a barrier to wildlife. Furthermore, the use of high fences is out of character with Headcorn's rural location, often being used in ways that would be more in keeping with a suburban environment.

**Figure 18: Examples of boundary treatments that are out of keeping**



**5.50** It is important that inappropriate boundary treatments are avoided, both in the village itself and the surrounding countryside, to ensure that Headcorn retains its sense of place, namely that of a rural location, rather than an urban or suburban setting.

## **5.ii Heritage and Conservation Area**

**5.51** Headcorn is a Parish that it is filled with historic buildings, both within the village itself and in the surrounding countryside. A key role for Headcorn's Neighbourhood Plan is to ensure that any development will protect and enhance this heritage. This applies throughout the Parish, not just within the Conservation in the heart of the village. So how does a development succeed where its very existence will have an impact on a heritage asset?

**5.52** One of the features that defines Headcorn's sense of place is variety. This is exemplified in its historic core, particularly in the area covered by the Conservation Area. Each building is orientated slightly differently and has made different choices in terms of shape and form. Taken together, for example, the buildings on the High Street form an organic, dynamic, and even slightly chaotic, attractive whole.

**5.53** It is possible to learn from this history, in order to inform future development, because whether it is a result of accident or design, there are certain design choices that have helped ensure that these relatively disparate buildings work well together. In particular, developments that are close to any historic building in Headcorn should reflect the lessons from Headcorn's historic core, namely:

- No single building should dominate. Headcorn has some relatively substantial properties, including buildings from the medieval period like Headcorn Manor, or Chequers on the High Street. However, these properties do not dominate or loom over the properties next to them. While they are bigger, their scale is in keeping with what is around them.
- The use and combination of local materials is key. For example, bricks and tiles made from local clay are very much in evidence on schemes spanning different centuries, allowing buildings to relate to each other, even if stylistically they differ.

- The ratio of the roof to the rest of the building, differences in detail between upper and lower storey, and picking up historical roof structures, such as the cat slide roof, can also help buildings relate well to each other.
- Finally, simple square boxes are unlikely to work. Headcorn's sense of place is defined by the variety of texture, shape, roofline and orientation found in individual buildings and how they sit next to each other.

**5.54** There are successful examples of new additions to the village, such as Tallow Court, where design choices have been explicitly based on historic styles, ensuring that buildings look as if they have always been part of the village. However, success does not have to be about simply producing a pastiche of previous architectural styles, but instead it is about making use of cues that ensures any new additions will relate well to existing buildings.

**5.55** An example of where this has worked well is the new primary school building on Kings Road, which sits next to the Headcorn Library and Old School building, which date back to the 1800s. As can be seen, these are very different buildings and the choice of windows, for example, marks the new school building as being proudly modern. However, the two buildings work well together, because despite its modern appearance the new school building has made use of key design cues that help the two relate to each other, including: the steeply pitched red clay tile roof; the form of the eaves; the proportions of the building; the fact that the new does not dominate the old; and the use of variegated red brick as a decorative feature on the gable end. In addition, the new school building also makes use of white weather boarding to clad the main part of the gable end, which picks up on design cues from elsewhere in the village. These buildings may be very distinct, but these types of detail help ensure that they are good bedfellows. It is this type of successful integration of old and new that Headcorn's Neighbourhood Plan is seeking to support.

**Figure 19: The old and the new – Headcorn Primary School and Library**



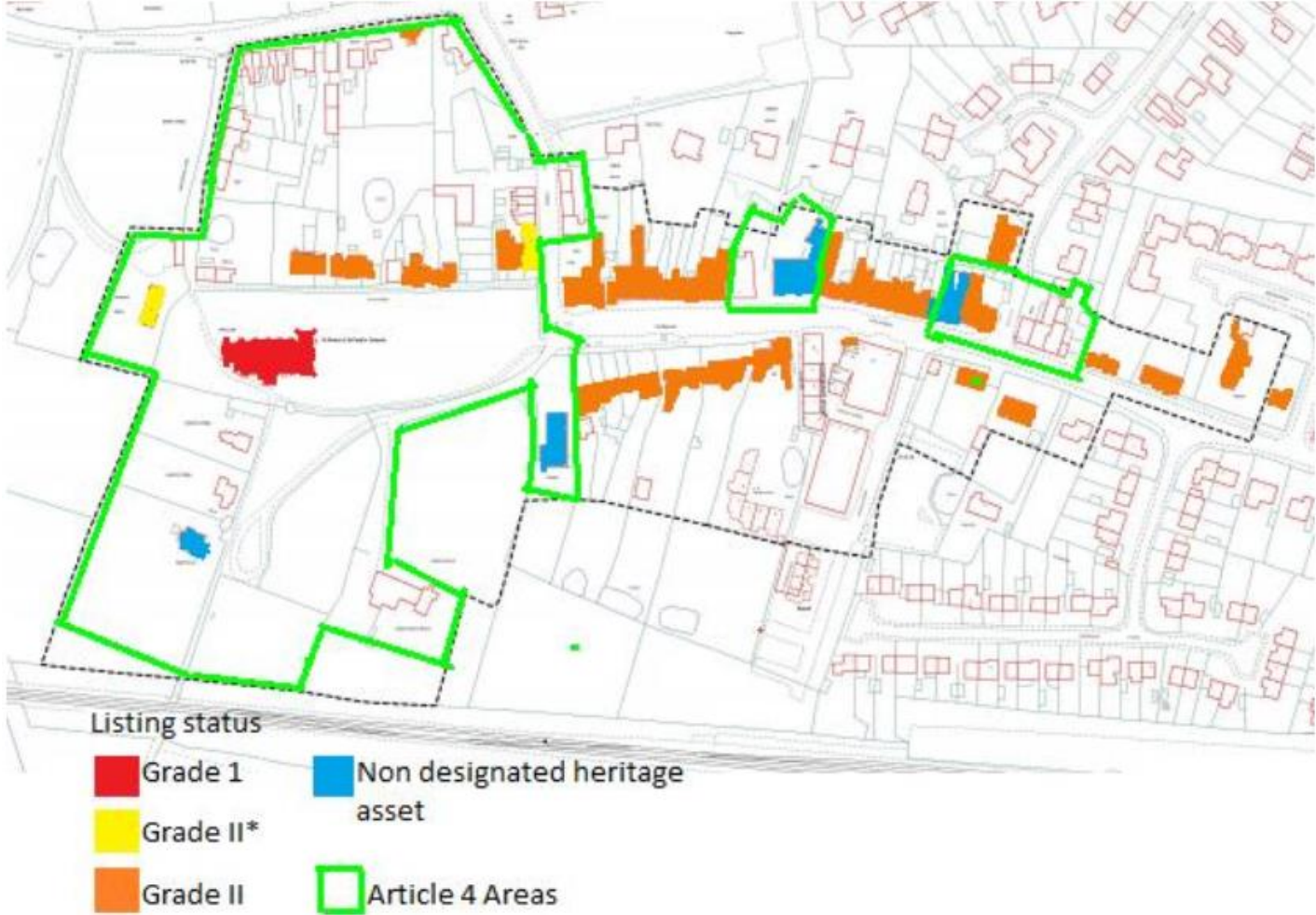
**5.56** The new school building is a good example of how the sensitive choice of form and materials can help the old and new sit well together and illustrates its importance even outside Headcorn's Conservation Area. The rules matter everywhere, which means that this guidance covers all development that will impact historic buildings in Headcorn.

**5.57** However, there is clearly an even greater need for any new development to work well with its historic neighbours in Headcorn's Conservation Area, because of the sheer number of historic buildings that any new development will potentially have an impact on. Headcorn's existing Conservation Area and Article 4 land is shown in HNP Policy Map 10.

**5.58** As well as the policies and guidance associated with Headcorn's Neighbourhood Plan, development in the Conservation area is therefore also subject to the Conservation Area Appraisal and Management Plan for Headcorn produced by Maidstone Borough Council. In October 2021, Maidstone produced a new draft Appraisal and Management Plan for Headcorn's Conservation Area. This included a proposal to extend the area within Headcorn's Conservation Area and to align the borders of Article 4 directions land (which enjoys even stronger protections) with the new Conservation Area boundary, as shown in HNP Policy Map 11. Headcorn Parish Council supports this proposal.

**HNP Policy Map 10: Headcorn's Conservation Area and Article 4 Directions**

100

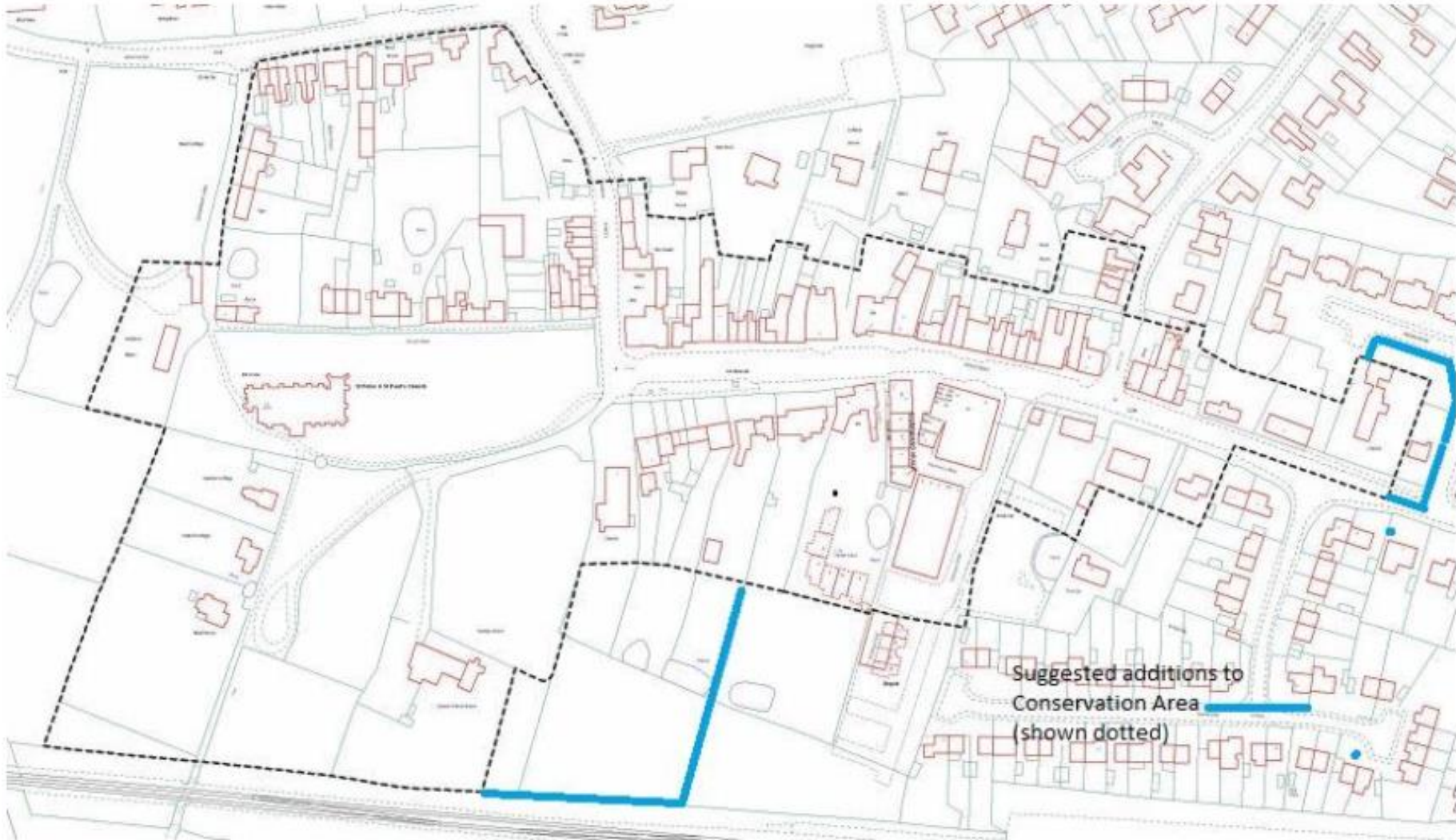


**Note:** A Conservation Area is designed to manage change in areas with a high proportion of heritage assets, in order to sustain and where possible enhance their significance. Land covered by Article 4 Directions confers even greater protection, by withdrawing permitted development rights granted by that Order.

**Source:** Maidstone Borough Council (2021).

**HNP Policy Map 11: Proposed new Headcorn Conservation Area and Article 4 Directions Land**

101



**Source:** Maidstone Borough Council (2021).

### **5.iii Being good neighbours**

**5.59** Successful development is not just about how it looks, it is also important that any new development should be a good neighbour, by being sensitive to the needs of those who are already there. In particular, new developments need to safeguard the privacy and daylight of adjoining residents and must not result in unacceptable levels of light, noise, air, ground, or water pollution.

**5.60** Furthermore, this is not just about “human” neighbours. All forms of pollution can have a very negative impact on wildlife and biodiversity. For example, light pollution can have a significantly negative impact on insect and bird life. Any ground and water pollution would risk having a significantly negative impact on the local streams and rivers, including the River Beult, which is a Site of Special Scientific Interest.

**5.61** Given Headcorn’s rural location, this makes it important the risk of all types pollution is kept to an absolute minimum. This includes, for example, limiting the use of external lighting, particularly in the countryside and edge of village locations, to help preserve the local fauna. Therefore proposals on external lighting need to demonstrate that proposed lighting is necessary.

### **5.iv Exterior Spaces**

**5.62** Headcorn is very much a rural village. Trees, hedges, rivers, ponds and green spaces help define its sense of place. Successful new developments in Headcorn, particularly new housing developments, are typically very green. They make good use of existing natural features, such as established trees, and think carefully about how both residents and wildlife will be able to enjoy the spaces on offer.



**Figure 20: Tallow Court provides opportunities for both residents and wildlife to enjoy**



**5.63** A good example of what Headcorn's Neighbourhood Plan is trying to achieve is Tallow Court to the south of the High Street, which was built around 2007-8. The pond in front of the development was already in existence and the developers chose to sensitively incorporate it within the scheme. The result is both perfect for wildlife and provides opportunities for residents to enjoy a tranquil green space. The planting around the pond creates both visual interest and shelter for wildlife, and in front of the development itself there is a small, more formal planting area, which both complements the development and

includes bench seating to allow residents to sit and enjoy the space. Thought has also been given to the safety of both residents and the local wildlife, through the sensitive use of picket fencing and iron railings to create distinct zones, without creating impermeable barriers for wildlife. While the space involved is not enormous, it successfully blends different needs to create a harmonious and visually pleasing external space.

**5.64** It is important that new developments seek to achieve similar success in their public green spaces. The experience from some recent developments suggests that developers can struggle to achieve an appropriate balance in this regard. One example of what not to do, which is discussed elsewhere in this guidance, is the Hazelpits development, which has large areas of hard standing and almost no greenery in either the private or public areas of the development, both of which are completely contrary to what Headcorn's Neighbourhood Plan is trying to achieve.

**Figure 21: The Hazelpits development – an example of poorly thought out green space**



**5.65** Another example is the Hazelpits development off the Ulcombe Road. Although the Hazelpits development has a large area of green space between the development itself and the core of the village, it is not well designed for residents to enjoy, involving several large pits in the ground, some with culverts in. This means that will not make an effective play area, particularly as in times of flooding the area could be potentially dangerous and there is no fencing to protect people. In addition, there is limited visual interest, no significant biodiversity in terms of the flora and nowhere to sit. This means its main purpose is simply to act as a water catchment area, but anecdotal evidence from residents suggests that it has not been effective in achieving this goal. Future developments should avoid making these mistakes, and seek to make more effective use of green spaces.

**5.66** As well as the public green spaces, it is also important that new developments also have effective private exterior spaces. Here thought needs to be given to the likely occupants. For example, houses aimed at families will need spaces for children to play, as well as outdoor spaces for eating and entertaining.

## **5.v Street scape – maintaining Headcorn’s sense of place**

**5.67** The aim of Headcorn’s Neighbourhood Plan is to ensure that any new roads visually resemble traditional village streets and country lanes, in keeping with the existing street scape. This will be achieved through:

- the appropriate choice of scale, width, layout and materials;
- ensuring that any street furniture, or signage will be in keeping with Headcorn’s rural location and will avoid creating a cluttered street scape; and
- the use and retention of mature native trees and hedgerows lining the road.

**5.68** Each element of this part of Headcorn’s design policy plays a role in achieving the overarching aim, of creating roads that visually resemble traditional village roads and country lanes.

### **5.v.a Scale, width, layout and materials**

**5.69** Creating successful developments is not just about the scale, layout and orientation of the buildings themselves, it is also about the roads and access within schemes. A key design aim of Headcorn’s Neighbourhood Plan is to ensure that any new roads visually resemble traditional village streets and country lanes and this as an important design imperative to help Headcorn retain its village feel. However, as well as having an attractive visual impact in keeping with their rural setting, roads and access points also need to be safe and effective for users, and the aim is to achieve both.

**5.70** In terms of the scale and width of roads, the aim should be to ensure that they are of a similar scale and width to the country lanes surrounding Headcorn village. Long, wide avenues may be very impressive in an urban or suburban setting, but they do not fit with Headcorn’s rural landscape. Instead the aim should be to minimise hard standing. As discussed elsewhere in this guidance, the large areas of hard standing that are found in the Hardwick’s development, for example, are unsuitable for use in a village like Headcorn and should be avoided.

**5.71** The country lanes and village streets that make up the historic core of Headcorn are rarely straight and the design of roads within new developments should replicate these winding curves. This helps allow for opportunities for visual delight, as new aspects of developments are revealed, as well as opportunities for screening things like parking.

**5.72** Narrow roads and curves can also help with traffic management, by discouraging speeding. Other aspects of road design can also help with this. An example of this type of clever design approach is the choice to add two parking spaces on the approach to Headcorn High Street, just before the junction to Forge Lane. These parking spaces not only help to support the customers of the businesses opposite, they also help to slow the

traffic as it enters the High Street, without impeding the sight lines for traffic exiting Forge Lane.

**Figure 22: An example from the High Street of using parking spaces to slow traffic**



**Note:** Satellite photo from Google Earth. Two parking spaces have been positioned directly on the road on the side of traffic heading west onto the High Street, just before the junction of Forge Lane. These provide parking spaces for the customers of the businesses opposite, but importantly also act to slow traffic entering the High Street. In contrast, on the east bound lane for traffic exiting the High Street, parking has been provided in bays cut into the pavements, in order not to impede the view of traffic exiting Forge Lane.

**5.73** As well as winding curves and minimal hard standing, another design trick that has been used in some of the older parts of the village is to split the main and service entrances of the property, by allowing small access roads for things like parking to the rear. Church Walk, Gooseneck Lane, and even parts of Headcorn High Street all use this approach.

**Figure 23: Access to the rear of properties on Headcorn High Street from Forge Lane**



**5.74** In terms of the choice of materials, the most prevalent material for road surfaces throughout the Parish is Tarmac. However, part of Headcorn High Street and some of the newer developments such as parts of the Chantry have also successfully used bricks laid in a herringbone pattern to create an attractive area of the public realm, at the same time as reminding people of the need to drive slowly.

**5.75** However, although bricks can be used successfully, success is not guaranteed, meaning thought needs to be given to a variety of design choices. For example, the Hardwicks scheme also used brick laid in a herringbone pattern, but in contrast to the Chantry and the High Street is much less visually successful. There are various reasons for this:

- The most obvious one is width, as the road is much wider than developments like the Chantry or surrounding country lanes.
- Another factor is the prevalence of straight lines, rather than curves.
- However, another factor is that all of the hard standing within the Hardwick scheme has been treated in the same way. The road, pavements, pathways, on-street parking spots and even the driveways with off-road parking are all treated in the same way, with nothing to break the monotony.
- There is also very limited green space of planting to soften the impact.

**5.76** Therefore the dominant visual impression that emerges from the Hardwicks is the sheer expanse of hard standing, with nothing to soften it. In contrast both the High Street and The Chantry development make use of alternative materials for the road and

pathways, and only some sections of the roads themselves make use of brick. The contrasting textures and colours help break up the hard surfacing and in doing so help avoid either any one material, or the hard surfacing as a whole, from visually dominating the space.

### **5.v.b Street furniture and signage**

**5.77** Headcorn Parish Council has placed significant emphasis on ensuring that Headcorn has an attractive and uncluttered street scape. One of the aims of Headcorn's Neighbourhood Plan is to ensure that new additions to the landscape, as well as potential redevelopment of existing areas, will continue this tradition.

**Figure 24: A successful example of integrating street furniture into a scheme from the Foremans Centre on Headcorn High Street**



**Note:** The choice of black for the bollards to mark the start of a pedestrian zone at the Foremans Centre helps them to disappear. The placement of the bollards, which is slightly set back from the pavement of Headcorn High Street, helps keep the High Street uncluttered. The regular placement of the bollards, together with attractive rounded tops designed to reduce risk of accident, help reinforce a sense that the scheme has been well designed. The addition of an old pump and bench seating, also painted black, helps reinforce a sense of a tranquil place to sit and shop. This is reinforced by the choice to add a circle of small pavers around a centrally located tree to provide and emphasize an attractive visual focal point. The positioning of the Automated External Defibrillator (AED) next to the bench seating, provides a potentially lifesaving addition to the street furniture. The AED's green and white colouring manages to highlight its existence, but its small scale and discreet placement next to the bench ensures that it is not overly visually intrusive.

**5.78** The aim is to ensure that the choice of street furniture and signage will achieve its practical goals, while remaining attractive. Important design choices include the colour, size, shape and placement. For example:

- Street furniture in dark colours can help ensure that it will not be visually intrusive.
- Ensuring that signage takes design cues from the colours of surrounding structures can help soften it, while still allowing it to create a visual impact.
- It is important to ensure that street furniture and signage does not block or dominate lines of sight, access or passageways, either as a result of its placement or its size.
- Ensuring that the choice of shape and design helps maintain a rural village feel is also important.

**Figure 25: Good examples of signage for commercial purposes**



**Note:** Clockwise from top left: The choice of faded colour on the adverts on the side of the building on the corner of the High Street and Forge Lane, and the fact that they are smaller than the windows on that elevation, help the adverts to blend with the white painted wall; signage for the shops on the corner of Foreman's Walk, just off the High Street, is small scale and attractive, blending with other decorative features, such as the colour of the window frames; signage on the A274 for businesses operating at Great Tong Farm is easily visible in both directions, while being attractive and small scale, and is sympathetically sited in a way that allows for the surrounding hedges and trees to be maintained; a hanging sign for Headcorn Tiles on Moat Road is attractive and small scale.

**5.79** In the case of signage, it is important that it is not just commercial signage that is appropriate for its rural setting. Signposts and street signs should also retail a rural feel.

**Figure 26: Examples of signposts and street signs with a rural feel**



### **5.v.c Trees and hedges**

**5.80** Trees and hedges are an important part of Headcorn's rural landscape, and are found lining the roads throughout the Parish. Even where historic man-made barriers do exist, such as the stone wall on the bridge across the River Beult on Water Lane, the barriers are low, allowing views across the countryside, and trees and hedges are still very much in evidence. Retaining, and where appropriate enhancing, the trees and hedging on the road network throughout the Parish is an important aim of this Neighbourhood Plan.

**Figure 27: Examples of country lanes and roads in Headcorn Parish**



**Note:** Clockwise from top left: exiting the village via the Smarden Road; the corner of Moat Road and Water Lane on the way out of the village; the bridge over the River Beult on Water Lane; and Black Mill Lane.

**5.81** However, it is not just the rural areas of the Parish where trees and hedging help define Headcorn's sense of place. Even in the historic heart of the village, such as the High Street or Church Walk, trees and hedging are very much in evidence. The result is that



there is a significant blurring between village and countryside, which helps make clear that Headcorn village is very much part of a rural landscape, rather than an urban or suburban one.

**5.82** Therefore there are good design reasons for seeking to ensure that trees and hedging are incorporated and used as part of the boundary treatment for schemes, and are retained on existing roads and boundaries. Mature trees in particular can also help screen buildings, and combined with hedging help soften the edges of the public realm. TV design shows often talk about bringing the outside in. Retaining and using trees and hedging is the village equivalent, by bringing the countryside in.

**Figure 28: Maintaining links with the countryside – examples of rural village roads**



**Note:** Clockwise from top left: Even the addition of traffic lights at the turn off to Moat Road from the A274 does not disguise the close links between the village and the surrounding countryside; looking down Church Walk towards the High Street, the retention of trees and hedges helps provide a leafy feel; the entrance to the Weavers off Grigg Lane where the retention of mature trees and use of hedging helps soften and screen buildings and is reminiscent of the surrounding countryside; even on the High Street at the heart of the village, mature trees, hedges and grass verges are very much in evidence.

## 5.vi The practicalities

**5.83** It is often the little things that can make or break a development, both in terms of its liveability, and in terms of its visual impact. Both these factors are important and need to be given careful thought. This means the practicalities associated with new development need to be well thought out, in order for developments to be successful, and Headcorn's Neighbourhood Plan seeks to encourage a thoughtful approach to solving practicalities, including issues such as:

- Parking. For example, ensuring both that there is adequate parking and that it does not create a cluttered street scape;

- Storage. For example: bicycles, refuse and recycling bins, and gardening and other tools;
- Connecting buildings to utilities. For example: telephone lines; gas and electricity meters; satellite dishes; and sewerage provision; and
- Future proofing. For example: solar panels and electric vehicle recharging.

**5.84** For schemes to work they need to give the residents and users of buildings what they need, at the same time as ensuring that they will work for those who only see developments from the outside, for example while walking or driving around the Parish. In many cases achieving these two goals will be aligned.

**Figure 29: Forge Lane – an example of solving several practical issues at once**



**5.85** In practice, successfully solving the practicalities will often involve thinking through how to address them as a whole, rather than on a piece by piece basis. For example, this scheme on Forge Lane successfully solves several practical issues together. It has a separate parking area at the front, which is laid out in a way that still allows both for a sizeable front garden and enables both visitors and residents to access the property without having to dodge round vehicles. As part of the parking area there is a shed that is camouflaged in a way that will minimise its visual impact, and provides a practical solution for storing bicycles and tools. The shed also has the benefit that it can be used to screen the refuse and recycling bins from the house itself, but because the shed is at the opposite end of the parking area to the street, this also minimises the visual impact of the bins for anyone on the street.

**5.vi.a Parking**

**5.86** Headcorn is relatively far from all the main local centres, meaning residents tend to be dependent on cars for transport. Furthermore, there is often a lack of safe on-street

parking available, particularly on narrow country lanes. Therefore effective parking provision is important for the success of any development in Headcorn, and this success will be determined by two main factors: the adequacy of parking provision itself; and how it is designed. Policy HNP4A of Headcorn's Neighbourhood Plan covers parking standards, while Policy HNP1F deals with the issue of design. This section aims to support the provisions in HNP1F, by providing guidance on the type of parking design that will help maintain the village feel.

**5.87** The aim of Headcorn's Neighbourhood Plan's approach to the design of parking provision is to ensure that it is spaced and screened in a way that minimises its visual impact. Key to that aim is to avoid parking schemes that will lead to the creation of large areas of hard standing, particularly where that will comprise part of the street scape associated with the development. Such an approach would be contrary to Headcorn's sense of place, which owes much to the country lanes and green spaces that are a key part of the village's fabric. Ways of achieving successful parking schemes that are found in Headcorn include:

- tucking parking around the side or back of properties to ensure that it does not dominate the approach to buildings. This can include the use of walled courtyards to house parking for several properties, or archways or gates that allow vehicles to be stored to the rear of properties;
- mixing the orientation of parking within a scheme, to avoid creating long lines of cars; and
- using public green space and planting to help soften the impact of parking provision.

**5.88** In general, developers should seek to avoid creating schemes where users' vehicles are all parked directly in front of each property at right angles to the road, as this creates a cluttered street scape and emphasizes the amount of hard standing on show. Where this type of approach to parking is unavoidable, then developers should use design tricks such as fencing the parking in a way that will create a pathway immediately in front of the property, in order to soften the approach and improve the visual appeal of the boundary treatment for the properties.

**5.89** Other practical design features to consider that will help determine how successful parking provision will be from the point of view of users include:

- how wide spaces are. Cramming too many spaces into a car park, as has been done at Headcorn Doctor's Surgery for example, make it extremely difficult for users to get in and out of their vehicles and should be avoided.
- the angle of the parking. Car parks where spaces are at 45 degrees (rather than 90 degrees) to the road can be easier to access, particularly where the approach road itself is narrow. This makes it a good choice for creating effective parking solutions, and therefore should be considered by developers.
- how safe the parking provision is. For example, ensuring that parking courtyards are overlooked by adjacent properties will help deter theft.
- how the parking layout is able to accommodate the needs of cyclists, motorcyclists and the mobility impaired.

**5.90** One final issue that needs to be considered in relation to parking is electric vehicle recharging. From a design perspective, this presents a variety of challenges. For example, recharging cabling creates potential trip hazards. Large numbers of electric vehicle recharging points by the side of the kerb, potentially create a cluttered street scape. Handling the need for recharging by putting recharging points at the front of each dwelling would result in large numbers of vehicles parked directly in front of each property, which is undesirable from a design perspective. Developers will therefore need to demonstrate how they will support the shift towards electric vehicles, while still ensuring that any parking is spaced and screened in a way that minimises its visual impact.

**Figure 30: Examples of good parking design options**



**Note:** Clockwise from the top left: tucking parking to the side and significant use of evergreen planting and hedges, helps soften the parking in the Chantry development; a driveway, with gates to the rear provides options for storing vehicles out of sight at the rear of the property for this house on the High Street; the use of fencing, planted borders in front of the property and different paving materials for parking and walkways helps soften the impact and create a strong boundary treatment, even though the parking is immediately in front of this property, which is part of the Hazelpits development; a walled carpark, created using local stone and softened by plantings, helps avoid the creation of significant on street parking within the new Hazelpits development; siting parking spaces within a greenspace, and retaining old trees, rather than having all the parking in front of the properties, helps soften the parking in this scheme in Forge Meadows; and the archway through to the rear of this property on the High Street creates options for storing vehicles.

### **5.vi.b Bins and storage provision**

**5.91** A key element to the success of any scheme, both in terms of its liveability and visual impact, is storage provision. Providing adequate storage within both domestic and commercial buildings is key for their usability. However, it is important to ensure that external storage solutions are effective, including for things such as refuse and recycling bins. From the point of view of creating visually effective schemes, thought therefore needs to be given to how to provide adequate storage, while ensuring that its design and placement will be both practical for users, while not marring the visual impact of schemes.

**5.92** For example, storing refuse and recycling bins along the front fence line of a property, ready to be put out on bin collection days, will be unattractive without any visual screening. Large numbers of unsightly refuse and recycling bins will ruin the street scape for passers-by, at the same time as meaning anyone looking out of the front windows will have their view marred by the sight of the bins. Potential solutions to this include tucking bins in between natural screening, such as hedging, to minimise their visual impact, or creating storage structures to the side of buildings that will keep them out of sight when not in use.

**Figure 31: Handling practicalities – the bins**



### **5.vi.c Connecting to utilities**

**5.93** Similar considerations apply to the choice how buildings are connected to utilities. For example, telegraph poles supporting large numbers of telephone wires and electricity cables can be unsightly, as can the placement of satellite dishes on the front or side of buildings where they can be easily seen from the street.

**5.94** Furthermore, in the case of connecting to utilities, the visual impact will not just be confined to how they connect to individual buildings. How utilities provision is handled for schemes as a whole can also have a big visual impact, and thought should be given to how to screen any necessary supporting infrastructure such as cabinets, in order to minimise their visual impact and avoid creating a cluttered street scape. Screening should be achieved through the use of natural planting and the choice of placement within the scheme, rather than the use of tall fences, which would simply replace one unattractive feature with another.

**Figure 32: A bad and good example of integrating and visually screening utility infrastructure and equipment – the Hardwicks and Ulcombe Road**



**5.95** Similarly, while it is extremely important to future proof developments, to ensure that they contribute to the fight against climate change, it is also important that the way this is done is supported by effective design choices. There is no reason why developments cannot be both good for the planet and visually appealing. This means thought needs to be given to how to provide and screen electric vehicle recharging, in order to minimise its impact on the local street scape.

**5.96** Similar thought needs to be given to the use of solar panels. It can be hard to adapt existing buildings to add solar panels, without giving the impression that they have been simply plonked on top, with no thought as to how this will affect the roof scape. New developments, however, have no such excuse and could easily integrate solar panels within roofs to create something that is visually attractive, rather than an unsightly after thought.

**Figure 33: Integrating solar panels within roofs is visually more attractive than post construction bolt on options**



## **6. SITING, LANDSCAPING AND PROTECTING THE NATURAL AND HISTORIC ENVIRONMENT AND SETTING**

**6.1** It is not just design that determines impact. A key factor influencing the impact of any development will be choices about siting and landscaping. Policy HNP2 is designed to ensure that choices on siting and landscaping will be made in a way that will help protect the natural and historic environment and setting in Headcorn, as well as to address specific challenges such as the risk of flooding.

### **6.i Historic setting**

**6.2** Headcorn Parish is situated in the Low Weald of Kent and contains a wealth of historic buildings of different ages reflecting Headcorn's growth over the centuries. These historic buildings, many listed, help define Headcorn's unique character. In the village itself, Headcorn's conservation area covers in the centre of the village (see HNP Policy Map 10), including the Parish Church of St Peter and St Paul.

**6.3** However, the rich history of the built environment in Headcorn village is also reflected in the wider countryside, with many examples of old farmhouses, some dating back to the 15th century, throughout the Parish. In addition to the traditional farmhouses, there are a number of workers' cottages throughout the Parish, many dating to the Victorian period. There are also many examples of historic agricultural buildings, including barns and oast houses, some of which have been successfully converted into dwellings.

**6.4** It is important that any development in Headcorn respects the setting of any listed buildings, or other buildings that contribute towards the character of the countryside, or exemplify the development of the Low Weald. In addition, any historic features within the site should be protected and sensitively incorporated to sustain the historic environment, including the contribution of these features to local character and identity.

### **6.ii Views**

**6.5** It is not just historic assets that need to be protected, certain 'views' within the Parish also need protection to help preserve Headcorn's sense of place. The views most valued by residents in the Neighbourhood Plan survey were those of the Church of St Peter and St Paul and the surrounding area including Parsonage Meadow and the views along the High Street within the historic core of the village. These views contribute important positive features to the Headcorn Conservation Area, as well as contributing to the significance of the Parish Church and numerous other designated heritage assets, including the listed buildings that line the High Street.

**6.6** There are also several key views out of the village, notably from the passenger bridge over the railway line, which gives an unimpeded vista of the water meadows of the Low Weald; from the footpath from the Church towards the railway line; and to the north and

north west from the Summer Hill, Black Mill, and Hazelpits Bank towards the Greensand Ridge. These key views are highlighted in HNP Policy Map 12.<sup>16</sup>

**6.7** However, there is also at least one part of the approach to Headcorn's High Street, where views could be enhanced, and opportunities to do this should be taken where possible.

**6.8** In addition, it is also important to preserve the way in which Headcorn sits within the landscape and in particular the views of the Low Weald from the Greensand Ridge. At present Headcorn village sits below the Summer Hill, Black Mill, Hazel Pits Bank and is not visible from the Greensand Ridge and it will be important to ensure that future development of Headcorn does not intrude in a way that would destroy the appreciation of the Low Weald from the Greensand Ridge, including the Greensand Way.<sup>17</sup>

**Figure 34: A view of Headcorn's rural setting from the Greensand Way**



**Note:** Headcorn's rural setting is typical of the Low Weald of Kent. Even Headcorn village is heavily camouflaged, remaining hidden in the landscape and it will be important that future development in the parish does not alter this. Photo taken at grid ref 835496, north of Parsonage Farm and Charlton Court, looking south towards Headcorn village.

---

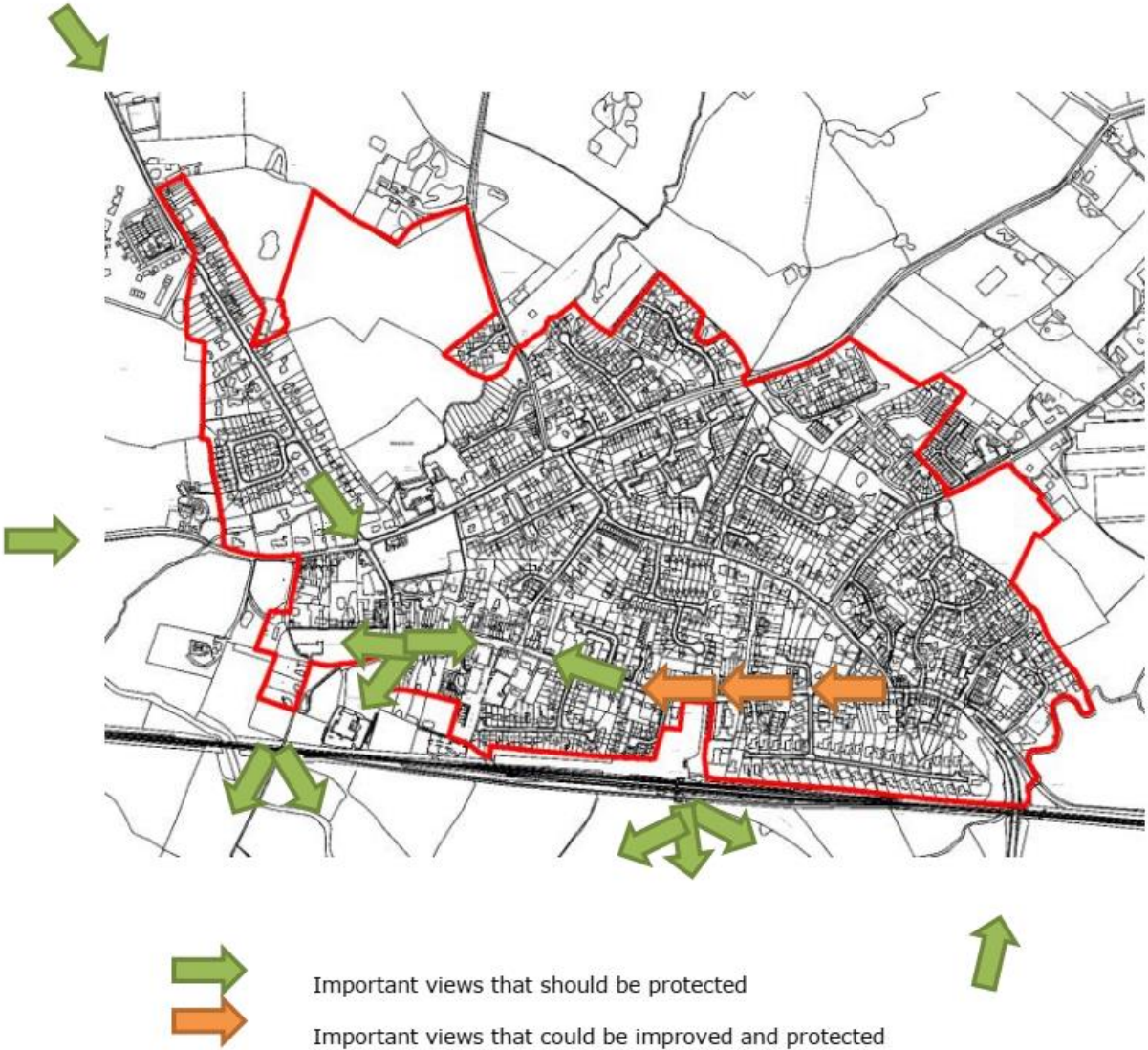
<sup>16</sup> See also descriptions in Section 8 in Maidstone Borough Council (2021).

<sup>17</sup> The Greensand Way is a long distance path of 108 miles in the South East running from Haslemere in Surrey to Hamstreet in Kent.



HNP Policy Map 12: Key views in and around Headcorn village

119



### 6.iii Green spaces

**6.9** Headcorn village is compact, with a density of buildings within the built-up-area of around 15 dwellings per hectare, roughly the same density as seen in other villages in Kent. However, this compact shape does not mean that Headcorn lacks green spaces. The centre of the village in particular benefits from two important green spaces, which are highly valued by residents, namely:

- Parsonage Meadow, which is adjacent to the parish church of St Peter and St Paul and new village hall and used for travelling fairs and smaller events. Parsonage Meadow was purchased from St John's College by Headcorn Parish Council in the 1970s; and
- Days Green at the entrance to the village abutting the A274 from Maidstone, which is the focus of major village events, such as the May Fair. Days Green was gifted to the village by the local Day family for leisure and enjoyment in 1951.

**6.10** Two other spaces have also been acquired for village use:

- Hoggs Bridge Green was donated in 1974; and
- Spires Ash in Grigg Lane was bought by Headcorn Parish Council in 1994.

**6.11** In addition, the village centre also benefits from the green space associated with the churchyard of St Peter and St Paul.

**6.12** The other large open space, which is available for community use at certain times, is the playing fields to the north of Headcorn Primary School. The community also benefits both from a variety of additional open green spaces, including:

- green spaces within developments, such as Knights Way, Forge Meadows and the pond at Sharp's Field; and
- a number of green spaces on the edge of the village that are available for recreational purposes, including the allotments, the football club, the cricket club and the bowls club.

**6.13** The abundance of green spaces scattered throughout the village, combined with the presence of numerous mature trees and hedgerows, contribute to Headcorn's sense of place and the impression that Headcorn is a green village that fits in well with its Low Weald setting.

**6.14** However, consultations with residents to support Headcorn's Neighbourhood Plan, including the Residents' Survey, have revealed a shortage of sports and leisure facilities and facilities for young people, as well as demand for more informal space for dog walkers. Therefore, it is important to not only protect existing open space, but also to enhance its provision in future.

**6.15** One of the aims of this Plan is to focus development on appropriate sites. To do this it is important that the green, historic and recreational spaces in and around the village should be protected. This includes protecting any Open Space allocations within Maidstone Borough Council's Local Plan. Communal green spaces within housing developments are

also an important part of the look and feel of the village and therefore in general these can only be developed where the result is of material benefit to surrounding residents or the Parish as a whole. In the case of recreational spaces, such as sports clubs, these are slightly different, because they are often in private hands. However, it is important that these recreational spaces are also preserved. So in general, while some development may, for example, be necessary to help upgrade facilities, the development of recreational spaces will only be allowed where the result is that the facilities provided are at least as good as the existing facilities.

**HNP Policy Map 13: Important green spaces and wildlife corridors in Headcorn village**



- Parish Council and church run Green Spaces
- Principal recreational spaces
- Wildlife corridors and stepping stones, including green spaces, waterways, ponds and ancient and species-rich hedgerows

**Note:** Source of satellite image: Google Earth © 2021 Maxar Technologies

## **6.iv Environment, habitats and landscaping**

**6.16** Headcorn's setting in the Low Weald of Kent means that it is a rural landscape characterized by small fields, ancient hedgerows, orchards, small wooded areas of native trees (particularly oak and ash) and natural water sources including rivers, ponds and natural soaks in keeping with the local geology and in particular the clay soil. Much of Headcorn's landscape has remained unchanged for centuries, with evidence from Tithe Maps, for example, showing that the current field boundaries in and around both the village and the rest of the Parish date back to at least the early 1800s (see HNP Policy Map 14). This history means that many of the hedges in the Parish benefit from a rich variety of local flora, including species such as hawthorn, blackthorn, elder and hornbeam. This landscape not only defines Headcorn's rural setting, it also provides an ideal habitat for many different species of wildlife. In addition, the retention of many hedgerows and established native trees within the village has meant there are natural access routes for wildlife into the village itself, much to the enjoyment of many residents.

**6.17** The definitions of the different types of key habitats within Headcorn Parish are set out in Section 6.iv.a. A key aim of Headcorn's Neighbourhood Plan is to protect this environment, particularly given the enjoyment that residents get from being surrounded by beautiful countryside, as well as the benefits that this landscape provides to the local economy, both through tourism and agriculture.

**6.18** Policy HNP2 therefore contains a variety of measures to ensure that development within the Parish is sensitive to the local environment, working with it and retaining key habitats where possible. This includes addressing one of the concerns that has been raised to the Parish Council, which is that developers often clear trees and hedgerows before putting a site forward for development, losing key habitats in the process. Landowners may need to address problems on their land, such as when a tree has become unsafe. However, such activity should not be undertaken purely to allow them to avoid having to agree appropriate environmental protections and landscaping with Maidstone Borough Council's Planning Department. Headcorn Parish Council is keen to discourage this where possible and to ensure that where there is a need to fell trees or clear hedgerows that these are restored by the sensitive reintroduction of native species, if a site subsequently comes forward for development.

**6.19** However, in line with UK Government policy, Headcorn Parish Council is also keen to ensure that future development will be undertaken in a way that will support biodiversity net gain. The approach taken by developers should be focused on supporting a proliferation of flora and fauna that is native to the Low Weald of Kent, in order to ensure that the net gain is not achieved primarily through the introduction of non-native species, which may out-compete local species, or be of limited value to local wildlife. Focusing on local species is likely to be most beneficial. For example, an oak tree can support hundreds of different insect species, while a horse chestnut, which is a more recent addition to the English landscape, supports only a handful. The choice of how best to deliver biodiversity net gain should be informed by ecological surveys. In addition, it is important that wherever possible the biodiversity net gains should be achieved within the development site itself.

However, where this is not possible, then any offsite solutions should be located within Headcorn Parish, and ideally managed in a way that local residents will be able to enjoy.

**6.20** In considering how to support local wildlife, developers should also look at design options that might help wildlife such as swift boxes, hedgehog holes and bat boxes. Developers should also consider whether a more ambitious approach would be more effective in some circumstances. For example, a larger pond might support more wildlife than smaller options. In general developers are encouraged to take an ambitious approach to encouraging and supporting local wildlife.

#### **HNP Policy Map 14: Tithe map of Headcorn from early 1800s**



**Note:** Tithe map dating from before the railway was built in 1842.

**Source:** Ordnance survey

#### **6.iv.a Definitions of Key habitats**

**6.21** When considering any new building, how best to protect the habitats that are defined in this Section, must be considered:

##### ***Wildlife Corridors***

**6.22** Boundary features are important biological characteristics of the local landscape, and many can be described as “Wildlife Corridors”; for example lines of trees and shrubs, grassland, other semi-natural habitats. These are usually linear habitats and often occur on agricultural land and alongside roads and railway lines. Wildlife corridors are often said to act as a means of dispersal for many species by linking isolated habitats such as woodland and grassland, allowing the movement of species through otherwise open or built up terrain. They are also important in the dispersal of plants, acting as a linear habitat for the

dispersal of seeds, and attracting insects for pollination. They contain a large part of the countryside's biodiversity, but are also considered important for agriculture, cultural and archaeological reasons. This is in keeping with planning guidance, which recognises the need for wildlife corridors in maintaining viable populations of flora and fauna that would otherwise suffer as a result of fragmentation and isolation. Very often these corridors link into and between ponds and their associated copses.

### ***Ancient, and/or Species-rich Hedgerows***

**6.23** Hedgerows form a distinctive and highly attractive part of the Low Weald landscape around Headcorn and as such penetrate into the built-up area. In keeping with its Low Weald setting, agricultural activity in Headcorn is exemplified by a large number of small fields and associated ancient hedgerows. Many of these hedgerows can be traced back to medieval times. The Tithe Map above (HNP Policy Map 14) dates from the early/mid 1800s shows the hedgerows near to the village centre, many of which still exist today. They are species-rich and are considered to be important for biodiversity conservation locally.

**6.24** Ancient hedgerows are defined as those that were in existence before the Enclosure Acts (1720-1840) in Britain, and these tend to support the greatest diversity of plants and animals. However, they are not the only species-rich hedgerows, which are defined as those containing five or more native woody species on average over a 30 metre length.

### ***Roadside Verges***

**6.25** Many of the roadside verges in the country lanes that come into the built-up area of Headcorn represent small areas of semi-natural habitat, and are an important collective biodiversity resource. Road verges can often support species-rich, long-established neutral grassland vegetation as well as being backed by ancient or species-rich hedgerows. They provide food and shelter for a wide range of wildlife, from birds, small mammals, to invertebrates such as butterflies and moths. Where possible, these must be maintained and integrate with wildlife corridors.

### ***Tree Preservation***

**6.26** It is important that development recognises the need to preserve older trees, especially the oak as these are also very important wildlife refuges. Design of new development should ensure that roads and properties do not damage these important trees by ensuring that sufficient distance is left between new buildings and existing trees.

### ***Woodland***

**6.27** Woodland cover in Headcorn Parish is limited, however the Weald ancient woodlands where they do occur are important local resources that should be retained and positively managed. Ideally plans should aim to help link these important habitats, and make sure they have an appropriate buffer from development that would otherwise disturb or damage woodland wildlife.

### ***Unimproved meadows***

**6.28** Where semi-improved or unimproved lowland meadows still exist these should be protected and enhanced, as an increasingly rare biodiversity resource in the low weald.

### ***Streams and ditches***

**6.29** Streams and ditches are important corridors for wildlife, and are characteristic of the Low Weald landscape.

**6.30** The River Sherway retains many plant species characteristic of Clay Rivers such as arrow head, water plantain and yellow flag iris, and is an important local wildlife site. There are also numerous other small streams and ditches in and around Headcorn and these add to the range of plants and other wildlife found locally.

**Figure 35: Examples of key aspects of Headcorn's environment**



**Note:** Clockwise from the top left: Hazel Pits ancient hedgerow/wildlife corridor; Hedgerow in field between Lenham Road and Grigg Lane; Pond in field between Grigg Lane and Lenham Road; and River Beult (SSSI).

### ***River Beult Site of Special Scientific Interest (SSSI)***

**6.31** The River Beult SSSI was notified under Section 28 of the Wildlife and Countryside Act 1981 as amended, Section 17 of the Water Resources Act 1991, Section 4 of the Water Industry Act 1991 and Section 13 of the Land Drainage Act 1991 in 1994.

**6.32** The River Beult flows for most of its length over Wealden clay which influences its ecology. It is one of the few clay rivers in England which retains a characteristic flora and



fauna. Most clay rivers in England are mainly found in central England, but have usually been canalised for land drainage purposes.

**6.33** The Beult flows through an agricultural catchment with sheep and cattle pasture, orchards and arable land. River flows are dependent on surface run-off and weirs are placed in spring to maintain levels. In common with many lowland rivers, the Beult has suffered some enrichment with phosphate and nitrate from sewage effluent and agricultural run-off. The SSSI runs from Smarden to the Medway confluence, but excludes the upper river which is ditch-like with an impoverished fauna and flora.

**6.34** The river supports a number of nationally important plants and invertebrates. In addition, the bare clay banks provide important nesting sites for the kingfisher amongst other birds.

### ***Ponds***

**6.35** In addition, Headcorn Parish contains a large number of ponds often associated with copses of willow and other tree types. These are also very important wildlife havens, in particular for the Great Crested Newt, a European protected species. The ponds also help prevent local flooding as they act as local water sumps during wet winters when the water table on the clay is very close to the surface.

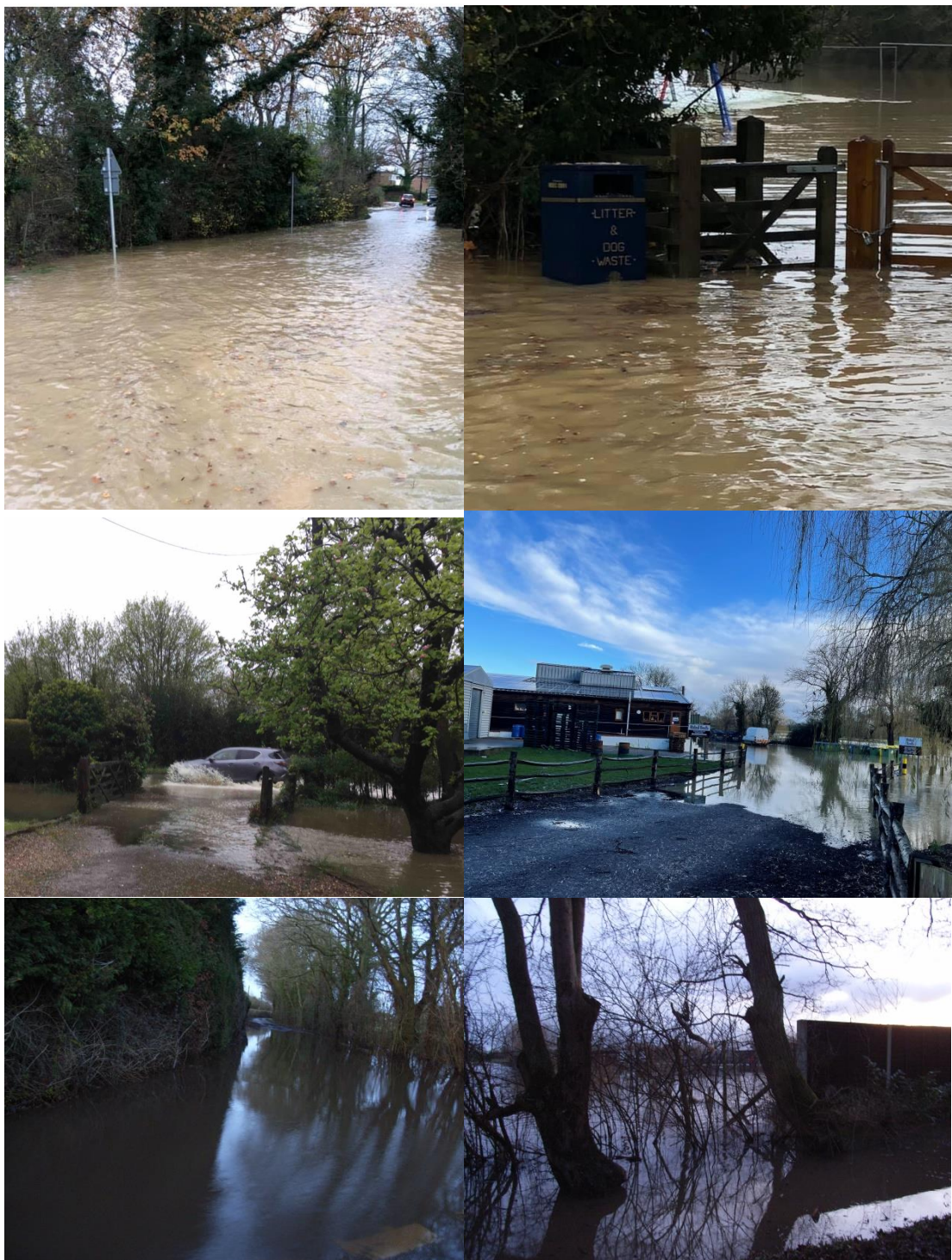
### ***6.iv.b Flood risk***

**6.36** As well as protecting the environment from development, it is also important to protect development (both existing and new) from the environment. This is particularly true of a key risk within Headcorn, namely flooding.

**6.37** The village of Headcorn is surrounded by three rivers, including the River Beult, which is an SSSI. These rivers bring benefits to the Parish, for example through the variety of flora and fauna they support, meaning that it is important to protect them. However, they also bring with them significant risk of flooding, something which is exacerbated by the speed at which the River Beult and its tributaries can flood.

**6.38** In addition, the local geology and particularly the clay soil means that the Parish also suffers from significant problems with surface water flooding. Combined these problems can contribute to making roads and fields within the Parish impassable after heavy rain, including the A274 to the south and Ulcombe Road within the village.

**Figure 36: Examples of flood events in Headcorn village and surrounding countryside from 2021**



**Notes:** Clockwise from the top left: Down from Uptons on Ulcombe Road; Hoggs Bridge Gate across to Hoggs Green; Naked Foods site on the Smarden Road; fields between Love Lane and Smarden Road; entrance to Love Lane; and Moat Road.

**6.39** When properties are flooded they take significant amounts of both time and money to repair. In addition, flooding is not only a problem for those directly at risk. It can also cause problems for the wider community, for example through higher insurance premiums. Therefore it is very important that any development in the Parish takes place outside

identified flood zones and avoids either exacerbating or creating additional fluvial or surface water flooding. As flood maps are only updated infrequently, a process that often involves homeowners reporting problems (at potential harm to their property value), the assessment of flood risk should not only take into account the latest flood maps, but also local knowledge of flood events. Assessing the risk of flooding is hard and there are significant downsides to getting this risk assessment wrong. Therefore local knowledge of flood events can helpfully supplement flood maps as evidence of flood risk. It is, however, important to recognise that the absence of any recent flood event cannot be used as evidence that flood maps are out of date - they are designed to capture the risk of events that only occur infrequently and therefore a recent lack of flooding does not undermine that longer term modelling approach.

**6.40** Minimising the risk of flooding is not just about ensuring that new development does not occur in areas that are known to be at risk of flooding. It is also important that development is only allowed where it will not increase the risk of flooding elsewhere. Maidstone Borough Council's Strategic Flood Risk Assessment (SFRA) from 2020 examined the potential for the cumulative impact of development to increase flood risk for third parties. This Cumulative Impacts Assessment showed that the assessed level of risk in and around Headcorn village and for most of the Parish was either High or Medium (see HNP Policy Map 15). The risk of exacerbating flood risk in Headcorn is also apparent from Headcorn's Surface Water Management Plan, published in 2017:

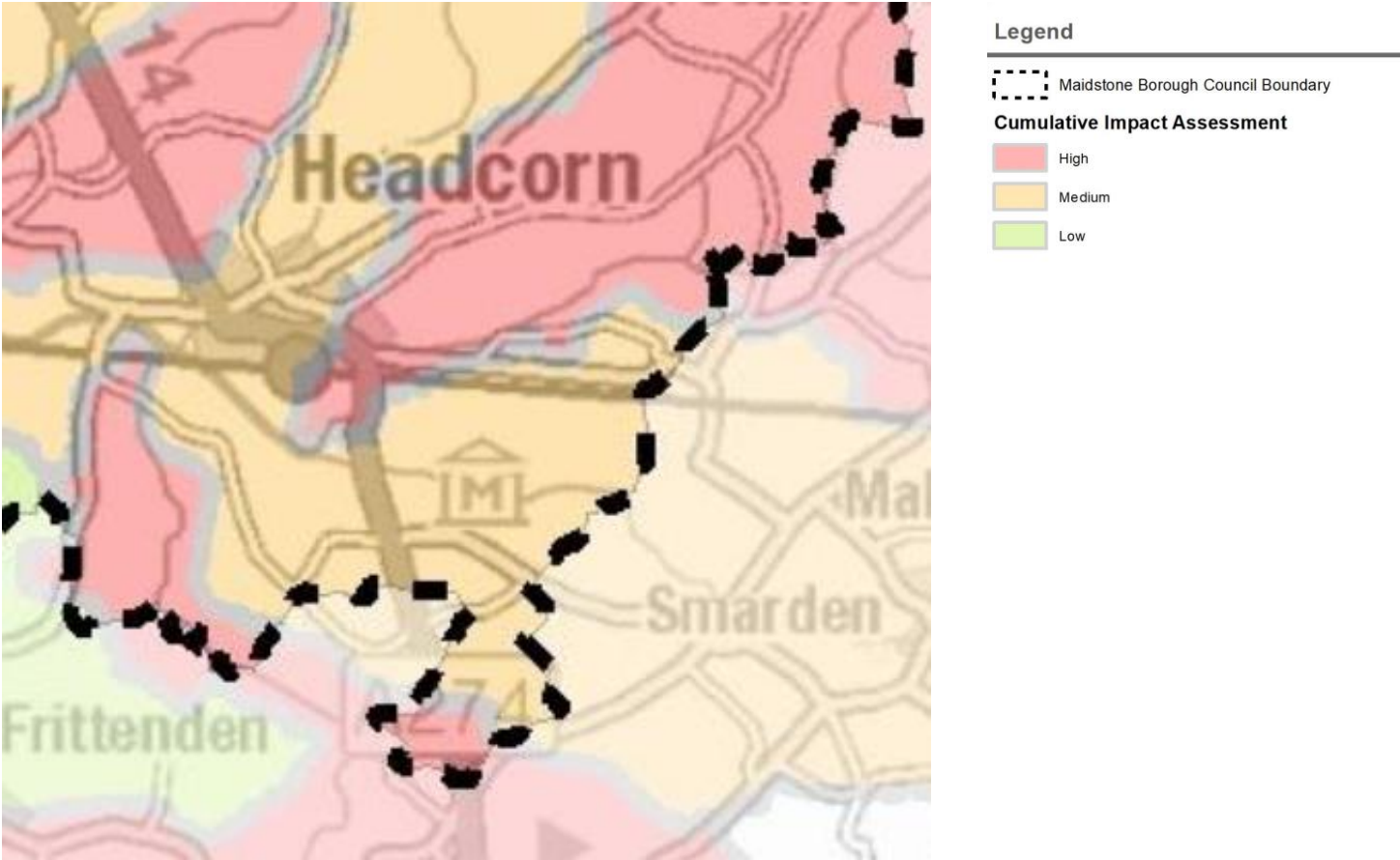
*"The topography of Headcorn is relatively low lying and is underlain by the Weald Clay, contributing to surface water flooding in the village. The report also noted that there are few surface water drainage systems, with runoff discharging to the foul network or into soakaways, which are unlikely to be effective. Flooding coincided with high river levels in the River Beult, which may indicate an inability of the surface water drainage systems to discharge runoff during fluvial flood events. No flood alleviation options were found to be cost effective, however it was proposed to install a rain gauge to ensure more accurate and timely flood warnings."<sup>18</sup>*

**6.41** Furthermore, the experience of recent developments in Headcorn suggests that current practices for managing surface water run-off have not been effective at preventing flooding. It is therefore very important that any new developments learn from these experiences and adapt their approach to address weaknesses. When development is allowed, it should be landscaped and managed in a way that will minimise flood risks, for example by minimising the amount of hard standing and having clearly defined responsibilities for the maintenance of features such as ditches and culverts.

---

<sup>18</sup> See JBA Consulting (2020), Maidstone Borough Council's (2020) Strategic Flood Risk Assessment.

**HNP Policy Map 15: Map of Cumulative Impacts Assessment of potential for development to increase flood risk for third parties in Headcorn**



130

**Source:** Excerpt from Figure 13-2, Maidstone Borough Council, Level 1 SFRA update and Level 2 SFRA (2020), JBA Consulting.

## 6.v Development in the countryside

**6.42** In line with the National Planning Policy Framework, in general development in the countryside in Headcorn should not be allowed, except under strict conditions. This is particularly true in more isolated parts of the Parish. However, where it does take place, it is important that it reflects existing development patterns, in order to ensure that Headcorn retains its sense of place.

**Figure 37: Examples of typical rural developments in Headcorn Parish**



**Note:** Development in the countryside of Headcorn Parish typically involves small clusters of buildings, used for either agricultural or domestic purposes, with fields on either side giving views out to the countryside. These photos show some typical examples of the grouping of buildings and historic architecture in Headcorn countryside. Clockwise from the top left the examples come from: Ulcombe Road; Plumtree Road; the view across the fields towards Grigg Lane; and view from the Smarden Road towards Love Lane.

**6.43** Developments in the countryside around Headcorn village are typified by small clusters of houses and agricultural buildings, with significant gaps between clusters. This development pattern ensures that the countryside in Headcorn Parish retains a rural, rather than suburban, feel, and maximises the benefits of views across the countryside. The siting and landscaping of any development in the countryside should therefore seek to replicate this pattern.

**6.44** It is particularly important that development does not take place in isolated parts of the Parish where there are currently no buildings. Avoiding development in isolated areas will help ensure the separation of individual developments. It will also create benefits for local wildlife, as light pollution is known to have a detrimental effect on many species. While there is no generally agreed definition of isolated, in order to help inform decision making, for the purposes of this Neighbourhood Plan it is defined as locations that are not within 200m of at least two established dwellings.

## **HNP Policy 2: Siting, landscaping and protecting the natural and historic environment and setting**

This policy covers all development in Headcorn Parish, including housing, gypsy and traveller pitches, commercial and community development. New development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted where it:

1. respects the setting of any listed buildings, or other buildings that contribute towards the character of the countryside, or exemplify the development of the Low Weald, and protects and sensitively incorporates historic features within the site to sustain the historic environment, including the contribution of these features to local character and identity;
2. will not have a detrimental impact on the distinctive views within the village and of the surrounding countryside (particularly those identified in HNP Policy Map 12, or contributing to the character or appearance of the Headcorn Conservation Area or the significance of other heritage assets) that can be seen from public vantage points within and adjacent to the built up area of the village. This includes the distinctive views to and from the nearby Greensand Ridge;
3. retains and, where relevant, enhances existing public green spaces (including spaces within existing developments) and recreational spaces (for example, sports clubs) within the Parish. In general, the loss of public green spaces within existing developments will not be permitted, unless it can be demonstrated that the development would be of material benefit to the surrounding residents, or the Parish as a whole; and a proposal involving moving a recreational space will only be permitted where the result is that the new facilities provided will be at least as good as the existing facilities, and where the accessibility of the new location from the Village is at least as good as from the existing facility;
4. respects the natural contours of the site and protects and sensitively incorporates natural features such as trees, hedges and ponds within the site, to make best use of the site to accommodate development, helping to preserve and enhance the natural environment in Headcorn, by providing a habitat for wildlife, and to sustain the contribution of these features to local character and identity;
5. maintains and enhances existing wildlife corridors and stepping stones, and avoids the use of impermeable barriers. Roadside verges and hedges, which are important wildlife refuges, should be maintained where possible when development takes place. Developments within and adjacent to the village itself should preserve and enhance the wildlife corridors that link with the central village and the surrounding countryside, to allow the free flow of wildlife into the parks and gardens of the village;
6. will deliver biodiversity net gain, in line with national and local targets, that is focused on supporting native flora and fauna. Ideally this net gain should be within the site itself. However, where this is not possible, any offsite solutions should be

located within Headcorn Parish, and ideally managed in a way that local residents will be able to enjoy.

7. is sensitively landscaped, making good use of native plants, including trees such as oak, hawthorn, hornbeam and ash as well as fruit trees, to protect and enhance the green nature of the built environment and rural landscape in Headcorn, and ensures that any loss of hedgerows and established trees from a site in the previous five years (or where it will be unavoidable to remove parts of existing hedgerows or established trees as part of the development) will be balanced by the provision of similar species within the development that will help maintain and enhance wildlife corridors within and around the site. In general, mature trees and hedgerows should only be removed as an exception and existing ancient hedgerows must be preserved as part of any new development. See HNP Policy Map 13 for a map of the ancient hedgerows and key wildlife corridors that have been identified in the immediate vicinity of Headcorn village;
8. makes appropriate use of landscape buffers between new and existing developments where they will help create and enhance wildlife corridors;
9. limits the amount of hard standing and hard landscaping associated with developments;
10. will not cause damage to local streams and rivers;
11. is not within the Flood Zone 3b, as identified by the maps provided by the Environmental Agency (or whichever body is officially responsible for providing flood information), and avoids Flood Zones 2, 3a and areas where Headcorn Parish Council is aware of recent flood events (including surface water flooding) affecting the site, unless it can be shown that the development passes the requirements set out in the sequential and exception tests for assessing flood risk and can demonstrate that the development will remain safe throughout its lifespan and will not increase flood risk elsewhere;
12. is able to deal with flooding and surface water run-off from the site in a way that will not increase the risk of flooding elsewhere (including on adjacent land), through the use of best practice techniques that are designed to address the challenges provided by the local geology and topography, as well as learn from the experiences of other developments in Headcorn; and
13. has adequate drainage provision with clearly identified responsibilities for maintenance, for example of ditches and culverts.

Outside the strategic allocations set out in the adopted Local Plan, where the proposed development is located in the countryside surrounding Headcorn Parish, then it must also:

14. reflect the established development pattern within the surrounding countryside of the Parish, which involves small clusters of dwellings and agricultural buildings,

with significant gaps in between that provide views out to the countryside;

15. avoid locations situated in more isolated parts of the Parish, unless the proposal involves the conversion of an established building, in order to preserve the unspoilt rural character of undeveloped parts of the countryside and retain separation between developments. In particular, development should be avoided where it is in a location that is not within 200m of at least two established dwellings.



## 7. CONNECTIVITY AND ACCESS

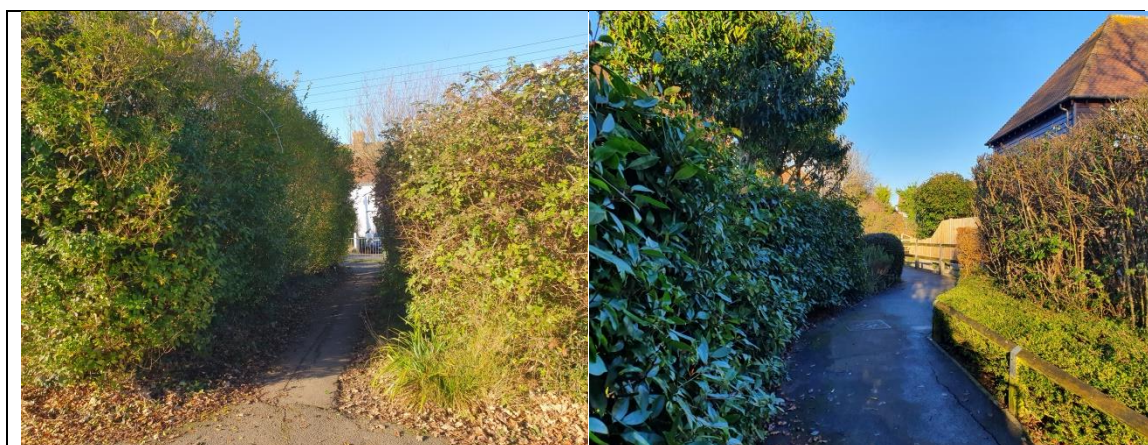
**7.1** Connectivity and access are an important part of the success of development schemes. They determine:

- how the development will sit within its environment;
- how residents interact with the village (for example are they encouraged to walk, or is using a car a necessity); and
- how easy it is for all residents to access both the countryside surrounding the village and the High Street at the village core.

**7.2** Headcorn's Neighbourhood Plan aims to ensure that new development throughout the Parish will be undertaken in a way that will foster good connectivity and access; will not create or exacerbate problems, for example for road safety; will reflect desired development patterns by, for example, avoiding the creation of ribbon development or rat runs; and will be undertaken in a way that is sensitive to the local environment and helps preserve key features such as wildlife corridors.

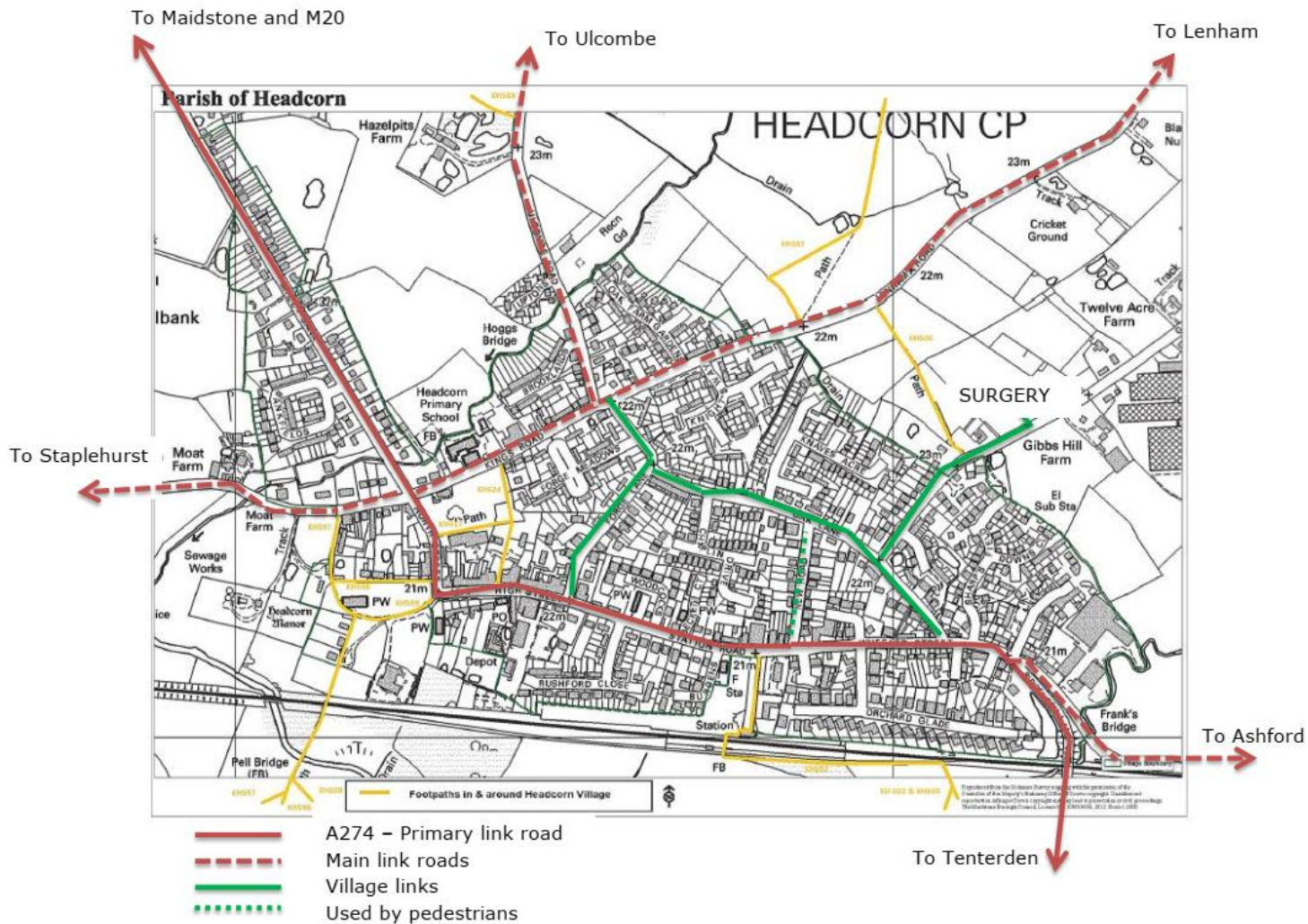
**7.3** At present Headcorn is well served by a series of roads and pathways that radiate out from the village core, see HNP Policy Map 16. These help foster both the commercial viability of the village High Street, as well as a sense of community connection, by encouraging people to walk around the village. Therefore, connecting new housing to the rest of the village by maintaining and enhancing this system of paths, roads and alleyways, enabling access on foot and by bike, will be essential. It is also important that any new pathways will remain operational in all weathers. For example, grass footpaths are likely to be unsuitable for key links from developments into the village, given the fact that Headcorn sits on Wealden clay, which means grass footpath rapidly become extremely muddy in wet weather.

**Figure 38: Good examples of footpaths linking developments to the main link roads in Headcorn village**



**Note:** From left to right: Path linking Forge Meadows and Kings Road; and path linking the Chantry and Oak Lane.

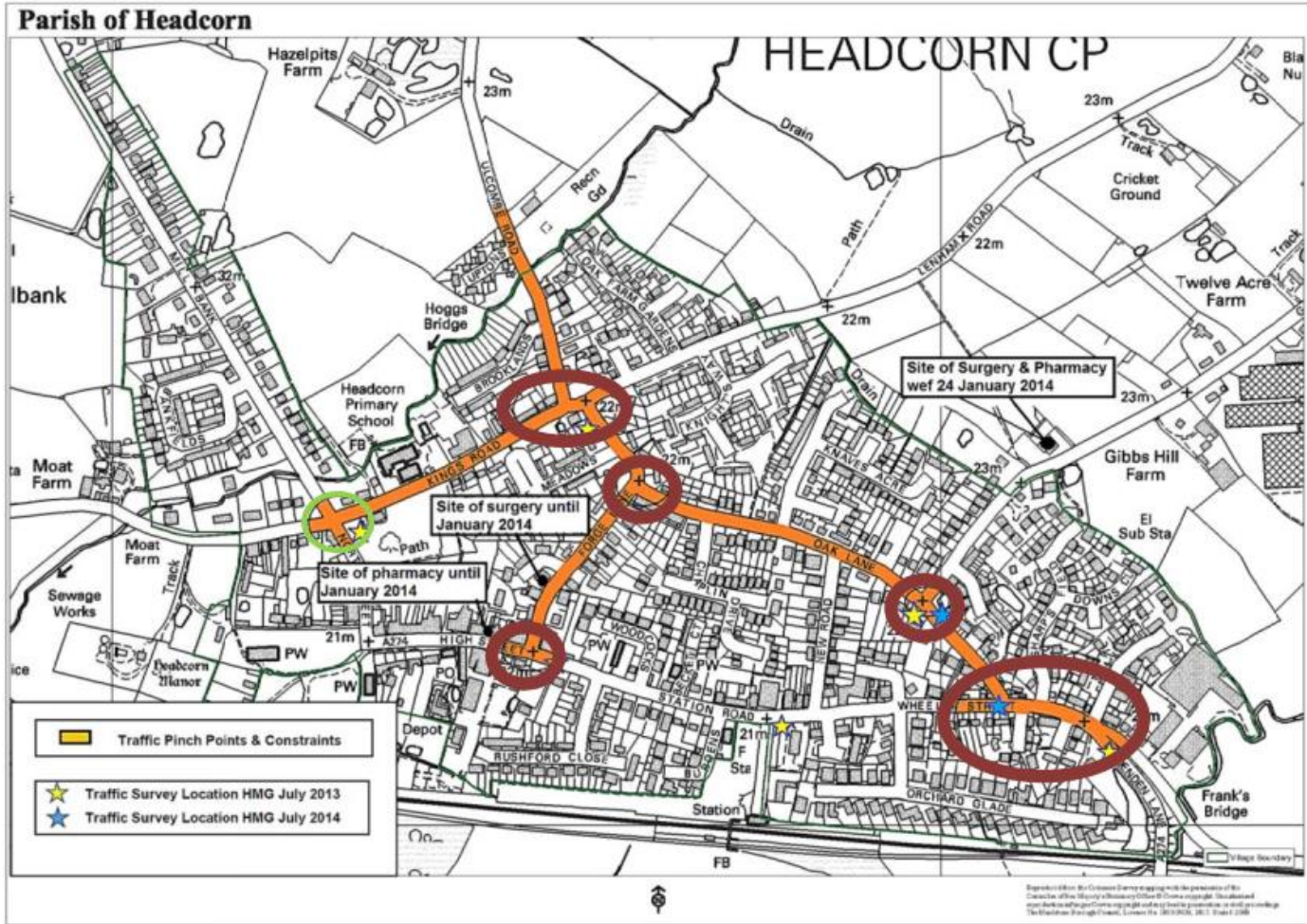
### HNP Policy Map 16: Connectivity within Headcorn Village



**Note:** The road marked with a dotted green line is New Road. This is a private road, but is used by pedestrians to access the railway station.

**HNP Policy Map 17: Traffic pinch points within Headcorn Village**

137



**Note:** Based on the results of Headcorn's traffic surveys. The green circle indicates where traffic lights have been introduced between the A274 and Moat Road and Kings Road, which anecdotally has helped improve safety at that junction.

**7.4** In addition, Headcorn's system of roads and pathways also allows good access to the countryside from the village, with a network of footpaths connecting to the lush water meadows of the River Beult to the south and the attractive agricultural land in other directions. This easy access to the surrounding countryside is highly rated by residents and needs to be retained and enhanced through new developments. These public rights of way (PRoW) are an important feature of Headcorn's landscape and this network should be preserved and enhanced.<sup>19</sup> Initiatives to help achieve this include Kent County Council's Rights of Way Improvement Plan (ROWIP). Developments should avoid creating any adverse impact on the PRoW network, including the enjoyment that residents gain from their use. Preventing harm should inform landscaping considerations.

**7.5** However, while access by foot or by cycle will play an important role in the success of a development, how vehicular access is organised will also have an important impact on the development's success. For example, the creation of "rat-runs" can be harmful both for traffic flows in the village as a whole and for the residents of the development itself and should be avoided. In addition there are certain key pinch-points within the village that could be exacerbated depending on how access was organised. For example, there is a bridge at the start of the Ulcombe Road that only allows a single lane of traffic. Thought therefore also needs to be given to ensure that there will be solutions in place that will be able to alleviate any pressures from new development on key parts of the existing road network.

**7.6** As well as fostering connectivity, how access is organised within developments (both to the development as a whole and to individual houses within the development) have an important impact on how a development will sit within its village or countryside setting. For example:

- residents are keen that sites should have a single point of access onto the existing road network, to reinforce the development of clusters of houses rather than ribbon development;<sup>20</sup> and
- depending on how access is organised there is a risk that where several new developments interconnect they end up creating a large, urban style estate by default, which is contrary both to the existing character of the village and to what residents want, meaning developments need to be self-contained. However, it is worth recognising that concerns about the creation of large developments by stealth primarily reflect concerns about vehicle access arrangements. Links between developments that created footpaths and cycle paths would be permitted, if they helped improve accessibility by foot or cycle to either the High Street or the countryside.

---

<sup>19</sup> PRoW are defined as "A way over which the public have a right to pass and repass, including Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic".

<sup>20</sup> Two out of three residents picked option B when asked to choose between "A: All the houses in a new development should have their own point of access onto the existing road system, so that they line the existing roads or B: New developments should have a single point of access onto the existing road system, allowing the development of clusters of houses". Headcorn Residents' Survey 2013.

### **HNP Policy 3: Connectivity and access**

This policy covers all development in Headcorn Parish, including housing, gypsy and traveller pitches, commercial and community development. New development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted where it:

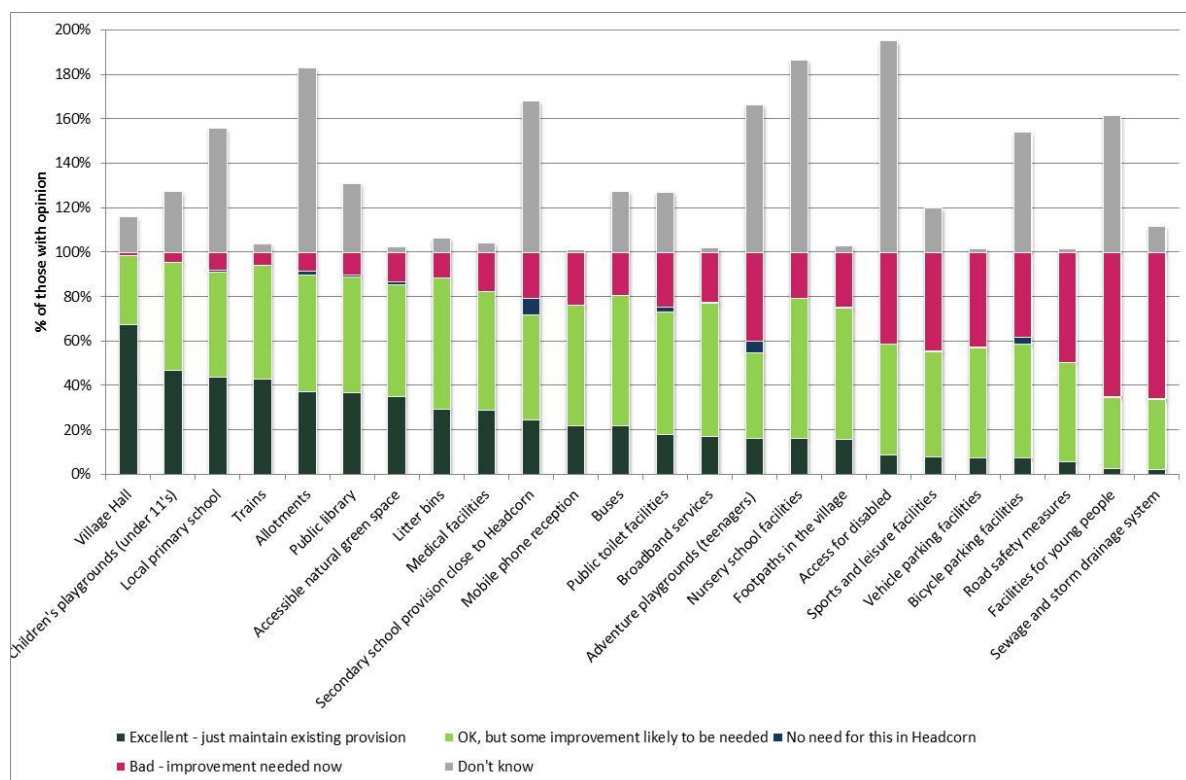
1. creates safe and well connected developments, promoting and enhancing links both to Headcorn High Street and to the countryside that can be easily accessed by foot and cycle;
2. where needed takes advantage of opportunities to enhance road safety, for example by enhancing existing junctions that will be key for access to the development (including any junctions with the primary or main link roads within the Parish) in a way that is appropriate for Headcorn's rural setting;
3. has direct access from the site to an existing highway or driveway, without the need to cross additional field boundaries;
4. makes best use of pre-existing site access (for example to facilitate the retention of hedgerows) unless reasons such as road safety require alternative access routes onto the existing road network to be provided;
5. creates a self-contained development, to avoid creating large estates by default;
6. is accessed in a way that avoids creating harmful rat runs;
7. is accessed in a way that avoids creating the appearance of ribbon development along the existing road network (for example with direct vehicular access to all the houses in the development to an existing road);
8. avoids choosing access routes that will exacerbate existing key pinch points for traffic flows within the village;
9. will not cause or exacerbate traffic problems, for example by blocking lines of sight at junctions; contributing to on-street parking; creating vehicular access that will be difficult to use, for example, because of poor lines of sight; or creating safety concerns for other road users (including pedestrians and cyclists); and
10. will be supported by an effective traffic management plan during the construction period, including a pre-conditions survey for any major development, which will respect the needs of existing residents and will avoid exacerbating key pinch points for traffic flows within the village, or the primary and main link roads within the Parish.

## 8. INFRASTRUCTURE PROVISION

**8.1** Infrastructure always plays an important role in development, and the history of Headcorn is no different. The strength of its infrastructure (including the railway station, primary school, library, vibrant High Street and doctor’s surgery) are the main reasons why Maidstone Borough Council has designated Headcorn as a Rural Service Centre (RSC). However, while some areas of infrastructure are valued by local residents and businesses, others, such as the sewage and storm drainage system, are seen as bad by the majority of residents, and businesses regard them as a constraint on future expansion. Therefore it is likely that some aspects of Headcorn’s infrastructure, such as the sewage and storm drainage system could act as a constraint on development in the absence of substantial investment.

**8.2** The choices reflected in Policy HNP4 on Infrastructure Provision have been informed by the results of the 2021 Residents’ Survey, which rated different aspects of infrastructure within Headcorn, the Regulation 14 Consultation, as well as previous evidence gathered.

**Figure 39: How are services and infrastructure rated in Headcorn?**



**Note:** Based on 2021 Residents’ Survey. The question wording was “One of the key reasons for introducing a Neighbourhood Plan is that it will enable the community to have more influence over the priorities for local infrastructure spending. To help identify what those priorities should be, thinking about how the village is likely to develop over the next 20 years, how do you rate the provision of the following in Headcorn? [TICK ONE FOR EACH TYPE OF INFRASTRUCTURE]”. Residents were given 5 options to assess each service: Excellent – just maintain the existing provision; OK, but some improvement likely to be needed; Bad – improvement needed now; No need for this in Headcorn; and don’t know. The percentages shown are a percentage of those who expressed an opinion (in other words excluding those ticking “Don’t know”. Options are ranked relative to the share of residents seeing provision as excellent.

**8.3** The aim of this Neighbourhood Plan is to ensure that Headcorn’s infrastructure is robust and will support the needs of residents and businesses in the Parish, both now and in the future. It therefore sets standards for four key aspects of infrastructure, which will help ensure this, namely: parking; broadband provision; water and sewerage management; and energy efficiency. With the exception of broadband provision, these standards apply to all types of development within Headcorn.

**8.4** As well as setting standards for key parts of the supporting infrastructure for development in Headcorn, Part E of Headcorn’s policy on Infrastructure Provision also sets the priorities for infrastructure spending in Headcorn, in order to ensure that it will best meet local needs.

## **8.i Parking**

**8.5** Parking has been a concern for residents in Headcorn for some time. In a comparison of 24 different types of infrastructure supporting Headcorn in the 2021 Residents’ Survey, both vehicle parking and bicycle parking ranked in the bottom five, with around 40% of residents identifying these as “bad, improvement needed now”.<sup>21</sup> Although both types of parking scored poorly in the survey, there was much more uncertainty associated with scoring the provision of bicycle parking, meaning the bulk of residents were more aware of poor vehicle parking than poor bicycle parking.<sup>22</sup>

**8.6** The results from the 2021 Residents’ Survey represent a slight improvement compared to the results from the 2013 Residents’ Survey, where around half of residents who expressed an opinion felt that both vehicle and bicycle parking facilities were bad.<sup>23</sup> This potentially reflects the impact of the global pandemic, with fewer people travelling to work in February-March 2021. In the case of vehicle parking, discussions with residents and businesses in meetings at the end of 2013 revealed that the biggest problem for parking is commuter parking on residential roads, followed by the cost of parking, although the availability of parking is an issue for some.

**8.7** The issue of commuter parking is not one of the availability of parking spaces in the station car park. For example, the traffic survey conducted in July 2013 revealed that the station car park was only three quarters full. The issue appears to be one of cost causing commuters to park in residential roads in Headcorn to avoid paying for car parking. In November 2021, charges for parking in the station car park range from £6.70 for a day, £29.30 for a week to £1,120.80 for an annual car parking ticket. To put this in context, the weekly cost of parking in the station would be 13.5% of the gross weekly income of those

---

<sup>21</sup> Percentage calculations are of those expressing an opinion, so exclude those who ticked “Don’t know” or didn’t answer.

<sup>22</sup> Compared to those expressing an opinion, an additional 55% of respondents ticked “Don’t know” for bicycle parking, but less than 2% ticked “Don’t know” for vehicle parking.

<sup>23</sup> The pattern for those ticking “Don’t know” in the 2013 Survey was also similar, with almost two thirds as many respondents ticking “Don’t know” for bicycle parking as expressed an opinion, but with almost all respondents expressing an opinion on vehicle parking.

at the bottom 10% of the income distribution; and 5.3% of the weekly income of those on median earnings.<sup>24</sup>

**8.8** Solving the issue of commuter parking on residential roads will require measures such as additional parking restrictions or improving enforcement, both of which are favoured by residents.

**Table 1: Weekly cost of travel by public transport from Headcorn**

	Cost (£)	% of median gross weekly earnings	% of gross weekly earnings for those at bottom 10 <sup>th</sup> percentile
<b>Weekly season ticket by train from Headcorn to London</b>	£137.60	25.0%	63.2%
<b>Weekly parking permit at Headcorn station</b>	£29.30	5.3%	13.5%
<b>Weekly bus fare from Headcorn to Maidstone</b>	£31.00	5.6%	14.2%

**Note:** Median gross earnings (in other words earnings before tax) in 2021 for all workers (full and part time) resident in Maidstone Borough were £549.50 per week and earnings of those on the bottom 10<sup>th</sup> percentile were £217.80 per week. Data based on the Annual Survey of Hours and Earnings published by the ONS.

**8.9** However, in planning terms, it is also important to ensure that new developments are supported by adequate parking facilities, to avoid exacerbating problems elsewhere. In the case of residential dwellings, Headcorn’s rural location makes vehicle parking particularly important, because the cost of travel by public transport, Headcorn’s distance from most local centres, and the irregular nature of most local bus services means that most local households rely on cars for transport.

**8.10** However, given this reliance on cars for transport, it will also be important to ensure that new developments help support a switch to electric vehicles, in order to help support the UK Government’s climate change goals and reduce emissions. The way that this is done needs to be sensitive to its potential impact on Headcorn’s street scape, in order to ensure that the village retains its rural charm.

**8.11** Considerations about its impact on Headcorn’s street scape also influence considerations on parking standards. Most households of more than one adult in Headcorn are likely to need more than one car. In addition, while garages are popular, they are much more likely to be used for general storage rather than parking cars. Therefore developments need to consider the likely requirements for outdoor parking, with the choice to provide parking in garages being an addition to the required provision. It is also important to consider the need for visitor parking.

**8.12** To achieve its aims, therefore, the approach taken by Headcorn’s Neighbourhood Plan is to ensure that:

<sup>24</sup> Data for earnings are for total gross earnings in 2021, in other words earnings before tax is deducted, based on Annual Survey of Hours and Earnings (ASHE) data for all workers living in Maidstone Borough.



- all new developments are supported by adequate outdoor parking facilities, to reduce the need for on-road parking in residential areas;
- all new developments demonstrate how they will facilitate the adoption of electric vehicles, without creating a cluttered street scape; and
- developments will not result of the loss of parking facilities that support the High Street (which is central to Headcorn's economy), or key local services such as the railway station or Doctors' surgery.

## **8.ii Provision of broadband**

**8.13** Even before the start of the global COVID pandemic, broadband provision had increasingly become a prerequisite for any economy to flourish. This is particularly true for areas like Headcorn, where distance from major urban centres means that residents are much more likely to need to work locally. Indeed in 2011, 18.9% of those in work in Headcorn worked mainly at or from home, compared to 10.3% for England as a whole. The Kent County Council Community Broadband scheme has a roll-out programme for the delivery of standard (up to 17mbps) and superfast broadband infrastructure (24mbps+). The programme for the built up area of Headcorn village covered the period of October 2014 to the end of 2015.

**8.14** In the 2021 Residents' Survey, broadband provision ranked relatively well, with only around a quarter of those expressing an opinion ranking broadband as "Bad, improvement needed now". This represents a significant improvement compared to the 2013 Residents' Survey, when around half of respondents expressing an opinion ranked broadband as "Bad, improvement needed now".

**8.15** It is important that effective broadband provision is maintained in the Parish, not just in existing properties, but also in new ones. BT has an obligation to provide a landline to every household in the UK. In addition, developers are expected to want to facilitate high speed broadband provision to make their developments marketable. However, there have been instances where developers have not contacted BT early enough in the process for fibre and ducting to be laid, or where they have relied on a national agreement with a cable provider that is not active in the area, leaving new housing developments with little or no connections. Therefore, this policy seeks to ensure that all housing developments are connected to superfast broadband.

**8.16** The policy covers housing in developments of more than one or two dwellings, because these are the developments where occupiers are most dependent on the developer to have installed the right infrastructure from the start. The aim is to ensure that this infrastructure is installed in a way that will future proof developments, by making sure that even if the most up-to-date form of broadband connection is not yet available within Headcorn, the relevant infrastructure is provided to facilitate such connections once it reaches the parish.

**8.17** While it is expected that community and commercial development will also want to comply with the same high standards, to ensure the longevity of the development, it is acknowledged that this needs to be a commercial decision based on the intended usage.

Therefore no specific condition is proposed for this type of development, but developers will need to demonstrate why they have decided not to install the relevant high-performance broadband option, because it will help determine whether the proposal would make good use of the land to be used for the development.

**8.18** Similarly for micro village developments and individual countryside developments, it is assumed that individuals will want to install the best possible option, but it is left to them to judge what is necessary.

### **8.iii Water and sewerage management**

**8.19** Of all the parts of Headcorn's infrastructure reviewed by residents in the 2021 Residents' Survey, the sewerage and storm drainage system was seen as the worst, with over 65% of residents rating it as "bad, improvement needed now".<sup>25</sup> This represents a deterioration of around 10 percentage points since the 2013 Residents' Survey. This deterioration occurred despite the fact that Southern Water, which is the company responsible for sewerage in Headcorn, has recently upgraded the sewerage system at Moat Road, meaning that sewage no longer flows onto Moat Road at times of heavy rain.

**8.20** The views of residents are consistent with the findings of the assessment of Headcorn's foul drainage assessment conducted by Sanderson (Consulting Engineers) Ltd, which was commissioned by Headcorn Parish Council in 2015. The study was a modelling exercise based on information provided by Southern Water. Results from the study identified that the current system has significant problems, including:

- 15 sewage pipes that already have insufficient capacity, including 9 locations, totalling some 432m linear run, on the main distribution network;
- 14 sewage pipes that suffer from back-fall (where sewage is trying to flow uphill);
- 74 sewage pipes (around 60% of the sewerage network in the village) where the pipes are not self-cleaning due to inadequate velocity; and
- 6 sections of sewage pipes that suffer from all three problems.

**8.21** These problems were in evidence throughout the village and included several sections of major pipework that were important for the functioning of the entire sewerage system in the village – in other words, problems were not simply confined to small, localised areas. The results also highlighted that Southern Water's records were far from complete, with at least some data missing for 45% of the manholes in the village, suggesting further problems might emerge when more accurate records are available. For example, at the time of the survey, the problem section of sewerage in Moat Road could not be modelled, because Southern Water's records suggested that sewage flowed in both directions, something that is unheard of in engineering terms.

**8.22** Ensuring that Headcorn's sewerage system will be able to cope with any proposed development is therefore a key aim of Headcorn's Neighbourhood Plan. The system must be able to cope not just in normal periods, but also in periods of heavy rain. This is

---

<sup>25</sup> Percentage calculations are of those expressing an opinion, so exclude those who ticked "Don't know" or didn't answer.

because many older properties in the village are legitimately allowed to discharge surface water into the sewerage system (and are charged for doing so). Beyond the obvious implications for human health, the ability of sewerage systems in Headcorn to cope is also important to avoid potentially undermining the ecosystems associated with Headcorn's streams, rivers and ponds, including the River Beult, which is an SSSI. Sewerage providers should be able to calculate whether the network is able to cope with the usage associated with peak demand (heavy rain), because they will know not only what normal flows are, but also how many properties are paying to discharge surface water into the sewerage system.

**8.23** Where relevant, proposals to connect to the existing drainage network 'upstream' of known flooding hotspots should provide improvements to reduce flood risk off-site.

**8.24** The use of holding tanks for sewerage that then pump into the main sewerage network is discouraged, because it potentially creates scheduling problems, including problems associated with discharging sewerage into the network in periods of heavy rain. Furthermore, Headcorn's experience suggests that holding tanks are not reliable; they create the need for regular pumping activities; and they require land to be allocated to sewage storage that could be used for other purposes.

**8.25** In addition to setting policy to ensure that sewerage and waste water will be adequately disposed of, Headcorn's Neighbourhood Plan also recognises that climate change will potentially create challenges around water usage. To address this, developments should look to promote the efficient use of water.

**8.26** However, as with the sewerage network, it is also important that the water supply network is able to cope with any increase in demand. Recent experience in Headcorn suggests that this is currently not the case. In 2022, half of the Village (on the Kings Oak / Weavers side) had no water supply, which lasted for 2-3 days and no water station was provided.<sup>26</sup> In 2023 again there was no water supply for half of the Village every evening for 2-3 nights in a row. A water station was provided at the Aerodrome, but this is located outside of the Village and is not a central location for any of the affected residents.<sup>27</sup> These two events could reflect one-off problems with the network. However, there is a risk that they are an indication that the significant increase in the size of the Village in recent years, combined with development elsewhere and the impacts of climate change, means that the water supply can no longer cope. It is therefore important to ensure that the water supply network has sufficient capacity to support development.

**8.27** In all cases, any solutions to issues around sewerage or water usage should not undermine the utility and comfort of intended users. This is to ensure that any developments will stand the test of time and will be usable both now and in the future.

---

<sup>26</sup> This resulted in compensation to the value of £2,500.

<sup>27</sup> Despite complaints, all that was received was an apology.

## **8.iv Promoting energy efficiency**

**8.28** There is a growing acceptance of the need to promote energy efficiency, in order to reduce emissions and help deal with climate change. Although it was not covered in the 2021 Residents' Survey, the issue of promoting energy efficiency was raised by several respondents in the comments. In addition, discussions with residents in 2014 and 2015 revealed that many felt that the introduction of environmentally friendly measures in new homes and commercial developments was an attractive option.

**8.29** In recognition of this, Headcorn's Neighbourhood Plan seeks to ensure that energy usage for all types of development in Headcorn will be lower than for standard properties of the type proposed. This is balanced by a requirement designed to ensure that the solutions employed do not undermine the utility and comfort of intended users, in order to support the longevity of developments. This reflects the recognition that the process of building and producing materials itself has an impact on the environment. Therefore it is important to make sure that developments will stand the test of time and will be usable both now and in the future.

**8.30** Opportunities should also be sought to consider how to minimise the environmental impact of development. For example, it may be more energy efficient to adapt an existing structure than to demolish it and rebuild.

## **8.v Priorities for infrastructure spending**

**8.31** Policy ID1 in the adopted 2017 Maidstone Local Plan lists the priorities for infrastructure spending within the Borough. However, the policy recognises that site specific considerations might require relative priorities to shift.

**8.32** As set out in the Vision underpinning Headcorn's Neighbourhood Plan, a key objective of the Plan is to ensure that Headcorn is supported by robust infrastructure that is designed to meet the needs of local residents and businesses. To achieve this, it is important that the infrastructure built to support development in Headcorn reflects Headcorn's specific needs. Policy HNP4(E) therefore reweights the Borough-wide infrastructure priorities to reflect the specific needs identified through the Headcorn Residents' Surveys, discussions with businesses and evidence gathered by Headcorn Parish Council through discussions with residents.<sup>28</sup> The policy is designed to ensure that in cases where there are competing demands for developer contributions towards the delivery of infrastructure for new development proposals, the demands will be effectively prioritised in a way that will best meet Headcorn's needs.

### **8.v.a Priorities for public realm improvements, such as road safety**

**8.33** In addition to identifying where any infrastructure spending will be best used, the 2021 Residents' survey also investigated for specific types of infrastructure provision, including road safety measures. Road safety and traffic management is a concern that has

---

<sup>28</sup> Results from the 2021 Residents' survey rating different types of infrastructure provision are shown in Figure 39 above. These are very similar to priorities identified in earlier surveys, as well as discussions with businesses, particularly in relation to the need to improve sewage and storm drainage system.

often been raised by residents in Headcorn. The 2021 Residents' Survey identified a range of measures with majority support. In descending order of popularity these were:

- No loss of strategic parking facilities;
- Introducing a pedestrian crossing by the station;
- Creating a 20 mile per hour zone on the Kings Road and Ulcombe Road, close to the Primary School;
- Adding physical markings on the surface of the A274 to show the speed limit;
- Adding speed calming measures on all the principal side roads into the village;
- Introducing traffic calming measures such as a traffic island on the northern edge of the village on the A274;
- Improving parking in the centre of the village; and
- Adding bollards on Oak Lane to reduce its width and reduce traffic speed.

**Figure 40: The use of road markings to reinforce speed limits**



**Note:** An example of the use of road markings to reinforce the speed limit from Broad Oak village in Sussex. These reminders appear at regular intervals throughout the village to slow vehicles on a long, straight stretch of the A265. More elaborate examples can include the use of a different coloured road surface (typically red) to create an even stronger reminder.

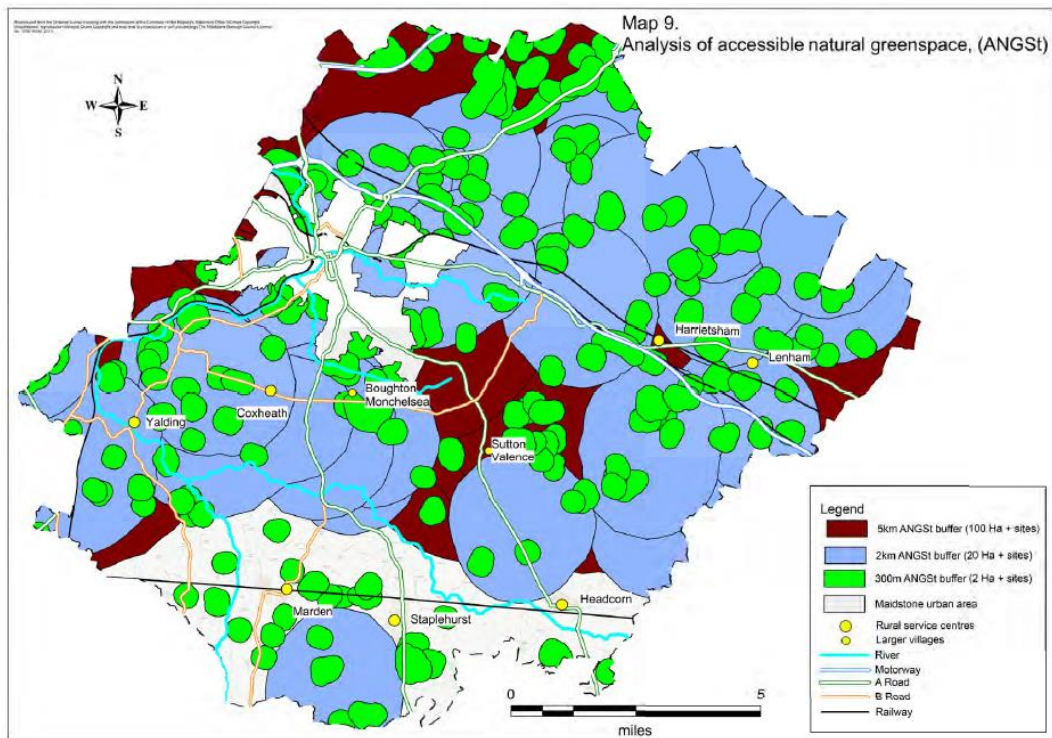
**8.34** Measures that did not enjoy majority support included: creating cycle lanes, either in new developments or the centre of the village; making all roads within the village boundary 20 mile per hour zones; making all roads within the village boundary except the A274 20 mile per hour zones; improving cycle parking in the centre of the village; and making Oak Lane and Forge Lane one way.

**8.v.b Priorities for open spaces**

**8.35** Headcorn's 2021 Residents' Survey also investigated preferences for the provision of different types of open spaces. Facilities for young people, including the provision of adventure play grounds for teenagers all scored poorly in residents' assessment of existing infrastructure in Headcorn. This suggests that facilities for teenagers need to be prioritised.

**8.36** In addition, there is also concern over the availability of sports and leisure facilities in the Parish, which is why Policy HNP2 in this Neighbourhood Plan looks to protect and enhance these. Headcorn Parish Council has also identified the need for more allotments, based on discussions with residents.

## HNP Policy Map 18: Map of accessible natural green space (ANGSt) in Maidstone Borough



**Note:** Map 9 from Maidstone’s draft Green and Blue Infrastructure Strategy. Headcorn does not have any green spaces meeting the ANGSt definitions.

**Source:** Maidstone Borough Council (2013)

**8.37** In contrast, the provision of children’s playground spaces for under 11s scored very highly in the 2021 Residents’ Survey, with almost 50% thinking provision was excellent, with no need for additional provision, and less than 5% rating provision as bad. This suggests limited need for children’s playgrounds for the under 11s, except in very large developments.

**8.38** In addition, although Headcorn benefits from green spaces scattered around the village, Headcorn fails to meet Natural England’s Accessible Natural Greenspace Standard (ANGSt), which has been adopted by Maidstone Borough Council. This standard recommends that people live within 300m of a two hectare natural green space, within 2km of a 20 hectare natural green space and within 5km of a 100 hectare natural green space. As can be seen from HNP Policy Map 18, Headcorn does not meet any of these standards.

**8.39** Whilst accessible green space was not flagged as a particular concern the 2021 Residents’ Survey, many residents have indicated that they would value more accessible natural green space in which they could walk their dogs, for example. In addition, over 85% of residents responding to the survey supported the introduction of either establishing a large area of natural green space within easy reach of the village centre, or of creating a wildlife sanctuary with access to the River Beult.

## **HNP Policy 4: Infrastructure provision**

### **A. Parking**

This policy covers all development in Headcorn, including housing, gypsy and traveller pitches, commercial and community development. New development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted providing it:

1. will be supported by adequate outside parking provision at each property. In the case of residential development this will include parking for at least one car per dwelling and a minimum of two cars for any dwelling of more than one bedroom, together with on-street parking provision of at least 0.2 spaces per dwelling;
2. can demonstrate how it will support greater adoption of electric vehicles through the provision of appropriate charging facilities;
3. will not result in the loss of parking facilities in the village that support either the High Street, or key services such as the railway station or Doctors' surgery; and
4. provides adequate cycle parking provision.

### **B. Provision of broadband in Headcorn**

This policy covers all housing developments (except for micro developments of at most two housing units). New development, in accordance with the Headcorn Neighbourhood Plan, will be permitted providing there is a Planning Condition that specifies that:

1. The necessary infrastructure will be provided to ensure that all new dwellings in the development will be served by a superfast broadband connection (or the appropriate future standard for high-performance broadband delivery) installed on an open access basis; and
2. The broadband provision is provided in a way that will enable future repair, replacement or upgrading, for example through direct access from the nearest British Telecom exchange.

Where it can be demonstrated that it is not possible to provide the relevant high-performance broadband at the time of construction (for example where it is not yet available in Headcorn), then the Planning Condition should state that:

3. the infrastructure should be installed to allow households to use the best available alternative on an open access basis, until it is possible to upgrade; and
4. the necessary facilitating infrastructure should also be installed to ensure that it will be easy to connect to the relevant high-performance broadband in future, once a connection is possible.

There will be no standard planning condition for high-performance broadband provision in

community and commercial development as part of Headcorn's Neighbourhood Plan. However, developers of community and commercial buildings will need to detail what broadband provision will be available (if any) and (if applicable) demonstrate why the expected use of the building means that it is not appropriate to install the relevant high-performance broadband option, to allow planners to judge whether this is acceptable.

### **C. Water and sewerage management**

This policy covers all development in Headcorn, including housing, gypsy and traveller pitches, commercial and community development. New development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted providing:

1. it employs best practice options for promoting efficient use of water, for example through rainwater harvesting;
2. where relevant, it can be shown that the water supply can cope with any increase in demand, including at times of high demand;
3. the disposal of any sewerage and waste water will follow the best practice guidelines provided by the relevant environmental body, and will not create risks for the ecosystems associated with Headcorn's streams, rivers and ponds;
4. the solutions employed will not undermine the utility and comfort of the intended users; and
5. where relevant, it can be shown that:
  - i. the sewerage system within Headcorn village, including the pumping station, will have the capacity to cope with both the existing demands on the system and the increase in sewage that will arise as a result of the development, including during periods of heavy rain;
  - ii. the Headcorn Waste Water Treatment Works, operated by the foul water drainage supply company for Headcorn, will be able to treat the projected sewage outflow and waste water from such development fully in accordance with its environmental permit; and
  - iii. where the use of sewage holding tanks is necessary, it can be shown that: they have been incorporated into the design of the development in a way that accords with the relevant Headcorn Design Policies and Design Guidance; and their use has been subject to an effective risk assessment, including of the capacity of the system to cope in the event of power cuts, in order to demonstrate that they will not create problems. In general, the use of sewage holding tanks within new developments is discouraged.



#### **D. Promoting energy efficiency**

This policy covers all development in Headcorn, including housing, gypsy and traveller pitches, commercial and community development. New development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted providing:

1. It can demonstrate how it will contribute to energy generation and a relative reduction in energy usage, so that the energy needs associated with the development will be lower than for standard properties of the type proposed; and
2. The solutions employed will not undermine the utility and comfort of the intended users.

#### **E. Priorities for infrastructure spending in Headcorn**

Recognising the specific needs for and constraints on infrastructure in Headcorn Parish, in line with the flexibility envisaged in Maidstone's Local Plan, where there are competing demands for developer contributions towards the delivery of infrastructure, secured through section 106 legal agreements or through Headcorn Parish Council's Community Infrastructure Levy (CIL) revenues, the demands should be prioritised in the manner listed below, which ranks infrastructure types in order of importance for Headcorn.

I. Infrastructure priorities for residential development will be:

1. Utilities (particularly sewerage provision, storm drainage, water supply and broadband)
2. Education (particularly nursery school provision and continued support for the development of Headcorn Primary School in line with needs)
3. Public realm (particularly road safety priorities, parking (including parking for bicycles), disabled access, flood defences and connectivity)
4. Emergency Services (including police)
5. Social Services and care services
6. Health
7. Transport
8. Open Space, both for wildlife and community enjoyment, including green pathways, ponds and woods – the priorities for amenity spaces will be allotments and sports facilities
9. Affordable Housing (particularly shared equity)
10. Buildings supporting community activity (especially libraries and the Village Hall to ensure existing provision in Headcorn remains strong)

II. Infrastructure priorities for commercial and community development will be:

1. Utilities (particularly sewerage provision, storm drainage, water supply and broadband)
2. Public realm (particularly road safety priorities, parking (including parking for bicycles), disabled access, flood defences and connectivity)
3. Education (particularly nursery school provision and continued support for the

development of Headcorn Primary School in line with needs)

4. Emergency Services (including police)
5. Open Space (both for wildlife and community enjoyment)
6. Transport

## **9. DWELLINGS – HOUSING AND GYPSY AND TRAVELLER PROVISION**

**9.1** The Vision underpinning Headcorn’s Neighbourhood Plan, together with Policies HNP1 to HNP4, provide the overarching framework governing all development in Headcorn. However, developments involving dwellings – places where people live – create additional opportunities and challenges, if they are to be managed in a way that will maximise their benefits and minimise any problems associated with them.

**9.2** Policy HNP5 therefore covers the specific planning considerations associated with introducing new dwellings, be they houses occupied by the settled community, or pitches associated with gypsy and traveller sites. The reason for treating different types of dwellings the same way is three fold:

- It is fairer;
- It reduces unnecessary duplication, given that the considerations determining the success of different types of dwelling are likely to be the same; and
- It recognises that gypsy and traveller developments represent a much higher proportion of dwellings within Headcorn Parish than is typical elsewhere, meaning it is important that the planning framework takes account of their potential impact on the built (or man-made) environment in the Parish.<sup>29</sup>

**9.3** In setting a policy covering the provision of new dwellings, Headcorn Parish Council is looking to provide an overarching framework governing new dwellings, and in particular to put in place rules that will promote small scale development. It has decided not to allocate specific sites. The reason for this decision is that Maidstone Borough Council is currently reviewing its Local Plan, and will look to allocate sites in Headcorn as part of that process. Therefore allocating sites through the Neighbourhood Plan would risk creating a clash with Maidstone’s Local Plan process, as well as duplicating effort. This is particularly true as, in the 2017 Maidstone Local Plan, a large number of the allocated strategic sites were small sites, including sites of fewer than ten houses. This means the Borough is likely to consider the full range of potential sites to form part of its strategic allocations, not just large ones.

### **9.i Density**

**9.4** The density of developments has an important impact on an area’s sense of place. Headcorn village is compact, with a density of buildings within the built-up-area of around 15 dwellings per hectare, roughly the same density as seen in other villages in Kent.<sup>30</sup> Therefore, in order to retain Headcorn’s sense of place, any new development should ideally replicate this type of density, which is why 15 dwellings per hectare has been set as the minimum density for all housing developments except for micro developments (developments of at most two dwellings).

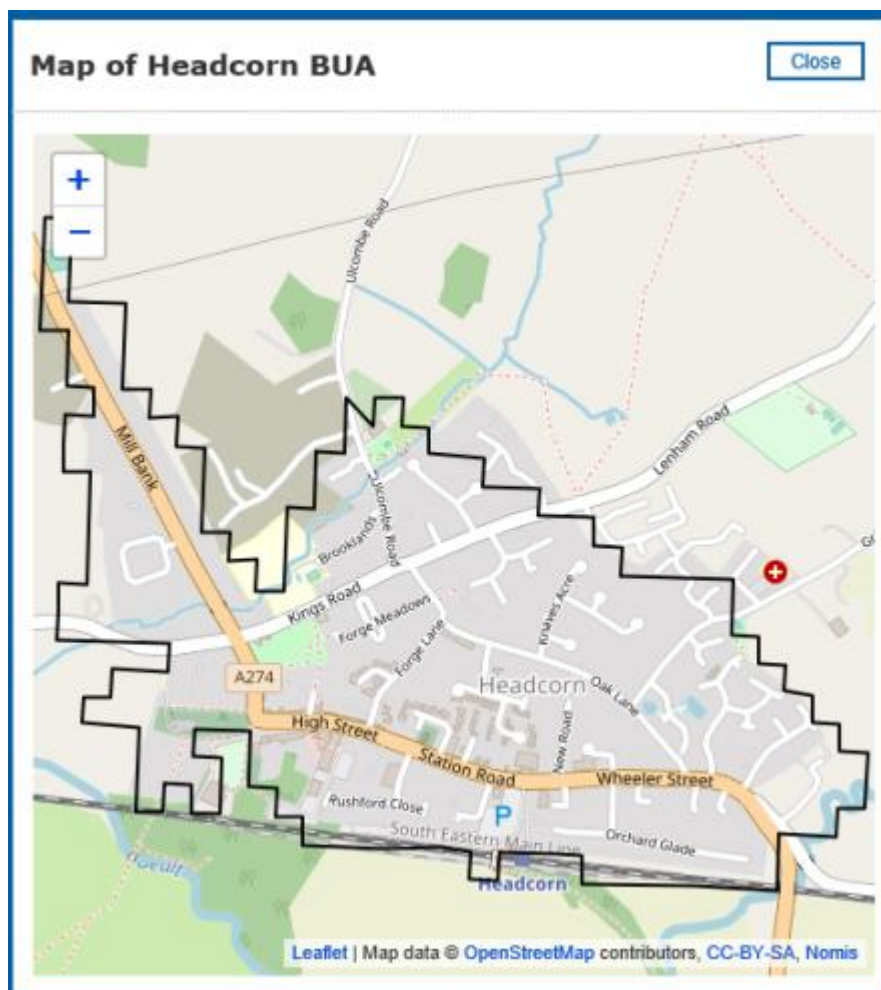
---

<sup>29</sup> Caravans or other mobile or temporary structures accounted for 3.0% of the housing stock in Headcorn Parish in 2021, compared to 1.2% in Maidstone and 0.4% in England as a whole.

<sup>30</sup> At the time of the 2011 Census, the built up area of Headcorn village consisted of 79 hectares, with an average of 15.3 household spaces per hectare within the village.

**9.5** The reason for setting higher densities would be to minimise land use – the higher the density, the less land is needed to provide the same number of houses. However, this clearly comes at a price – it restricts the amount of green space available for both residents and wildlife to enjoy and changes the feel of the built environment either by using smaller and smaller plots, or by building higher and higher. This change will be most dramatic in the case of villages, because the scale of development that takes place can be large relative to the existing village. For example, Maidstone’s 2017 adopted Local Plan specified strategic housing sites accounting for 423 new homes in Headcorn village over the plan period of 2011 to 2031. This is equivalent to a 35% increase in the number of dwellings in the village itself compared to 2011 and will have a material impact on the look and feel of the village as a whole. If this housing is delivered at 30 houses per hectare (or double the existing densities in the village), on its own it will increase housing density within the village from an average of 15.3 to 17.6 dwellings per hectare, a 15% increase. If the density of these new developments is higher still, then it will have an even greater material impact on Headcorn’s sense of place.

### HNP Policy Map 19: Built up area of Headcorn village



**Source:** Office of National Statistics, Nomis database. The 2011 Census dataset for population density (QS102EW) measures the built-up area of Headcorn village shown above as 79 hectares. At the time of the 2011 Census this area held 1,211 household spaces (a density of 15.3 household spaces per hectare) and was home to 2,505 residents (a density of 31.7 people per hectare).

**9.6** Residents in Headcorn are very keen that it retains the sense of being a village, and that development should be more suitable for a village than a town. To achieve this Policy HNP5 therefore looks to ensure that any new development will be supported by appropriate garden spaces, and sets a maximum density of development of 30 houses per hectare. The only exceptions will be where it can be demonstrated that innovative solutions will support higher densities, in a way that will not undermine the landscape quality reflected in developments within Headcorn Parish.

## **9.ii Additional siting considerations for new dwellings**

**9.7** Headcorn is a relatively compact village, with the majority of dwellings being situated within a ten minute walk of the village centre, which helps support a strong sense of community. Policy HNP2 sets the overarching framework associated the landscaping and siting of developments in Headcorn. However, survey evidence suggests that residents are very keen for Headcorn to retain its sense of being a country village, and that they see Headcorn retaining its distinctive compact shape as being a key component in achieving this. To ensure that this happens, it is therefore important that any development involving new homes reinforces this compact development pattern, particularly if it involves more than one or two dwellings.

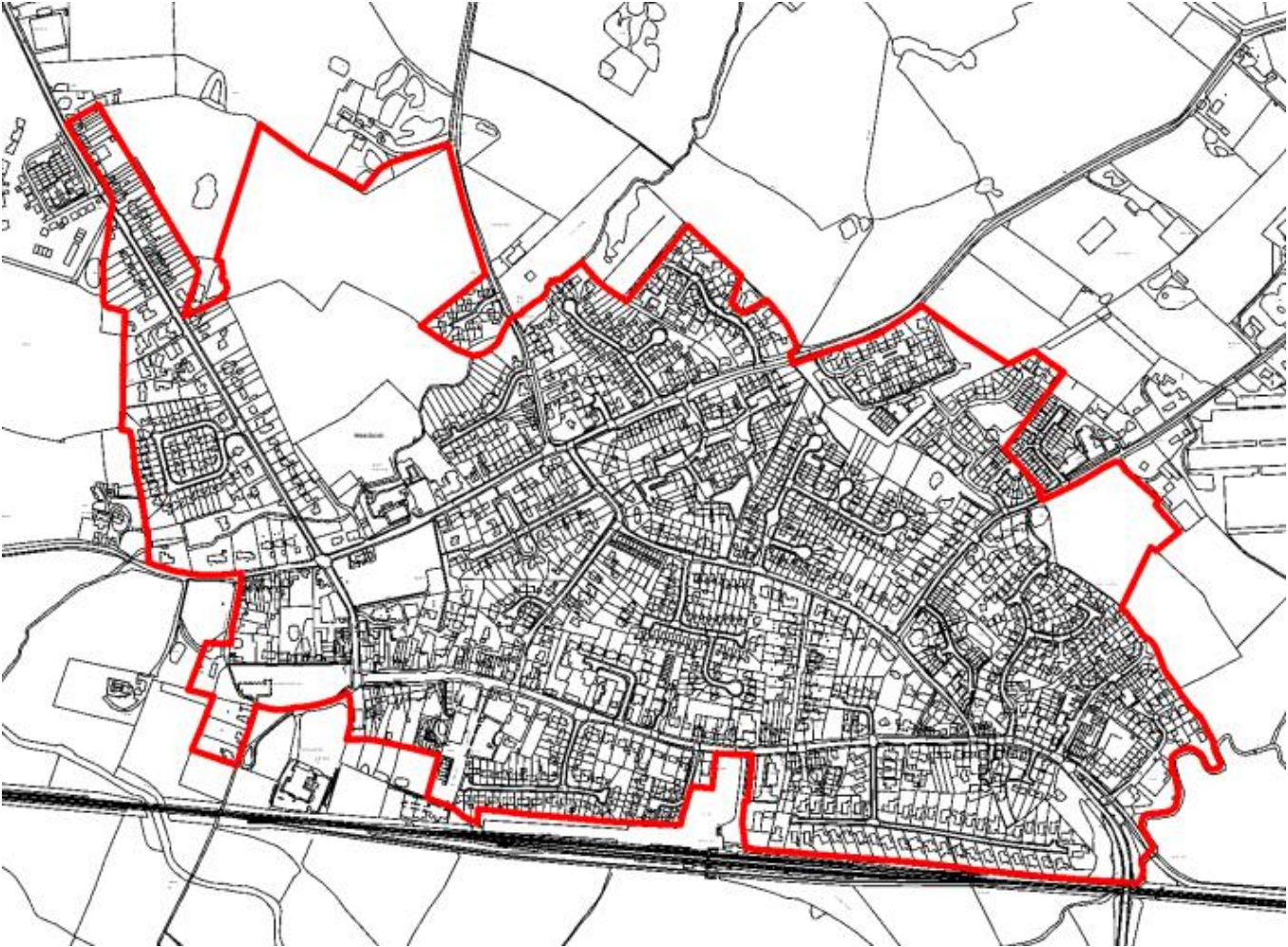
**9.8** Therefore, outside any strategic allocations associated with Maidstone’s Local Plan, new development in Headcorn should be within or immediately abut the existing village boundary, as defined in the most recently adopted Maidstone Local Plan. The village boundary in the 2017 adopted Maidstone Local Plan is shown in HNP Policy Map 20.

**9.9** This development pattern is a priority, so there will be relatively few exceptions. Outside strategic allocations, the only exceptions to the need for new developments to abut the existing village envelope (as defined in the adopted Local Plan) will be:

- micro developments of one or two dwellings;
- cases that are allowed under permitted development rules; and
- community self-build projects of at most 9 dwellings for schemes that involve individuals with strong links to Headcorn Parish coming together to organise the design and construction of their new homes directly.

**9.10** For the purposes of Headcorn’s Neighbourhood Plan, a community self-build scheme is defined as a scheme where a group of individuals with strong links to Headcorn Parish come together to organize the design and construction of their new home directly, either by building the house themselves, or working with subcontractors. Unless the scheme is within or immediately abuts the existing village envelope, the maximum size of a Headcorn community self-build scheme will be nine dwellings. The reason for including community self-build projects in the list of exceptions for developments that can take place away from the village is that these are minor developments that would directly benefit Headcorn residents, but where residents may struggle to obtain affordable sites.

**HNP Policy Map 20: Headcorn Village Boundary**



**Note:** Village boundary in the adopted 2017 Maidstone Local Plan.

### **9.ii.a Development in the countryside**

**9.11** The National Planning Policy Framework sets stringent rules for any development in the countryside, and in general such development is not allowed. Headcorn's Neighbourhood Plan follows this policy approach. The countryside surrounding Headcorn village is a valued asset, and contributes in an important way to Headcorn's sense of place.

**9.12** However, there may be cases where exceptions will be acceptable. In those cases, it is important that development is managed in a way that will not undermine the character of the Low Weald, particularly as the majority of Headcorn Parish sits within the Low Weald Landscape of Local Value.

**9.13** One factor that concerns the Parish Council and residents is the potential for unconstrained development in the countryside surrounding Headcorn Parish to result in the suburbanisation of the countryside. Part of Headcorn's sense of place is the character of the countryside, which involves small clusters of dwellings and agricultural buildings, with large gaps in between allowing views over the Low Weald countryside. Some recent developments, however, including developments that have occurred without prior planning permission, have resulted in splitting fields and introducing multiple dwellings, producing what is relatively high density development for a rural location and a relatively suburban ribbon-like development.

**9.14** The impact of this type of development can be seen from Figure 41, which charts the evolution of three fields in the eastern part of the land between the Smarden Road and Love Lane in Headcorn between the period 1940 and September 2021. This land is over 1.3km from the edge of Headcorn village, and almost 2km from the village centre. It remained untouched between 1940 and 2008, with no man-made structures being added into the three fields that made up this parcel of land. Between 2008 and 2011 a single large barn was added in the south eastern corner of the parcel of land, but otherwise the field boundaries remained the same. However, between 2011 and 2021 significant development took place:

- the three fields were broken up into around 40 separate parcels of land, often enclosed behind high fences that block the open nature of Headcorn's countryside and make it harder for wildlife;
- a large number of man-made structures were added; and
- a significant amount of hard standing was introduced.

**Figure 41: Land between the Smarden Road and Love Lane – 1940, 2008, 2011 and 2021**







**Source:** Google Earth. 1940 Map: 2021 Kent County Council; 2008 Map: © 2021 Getmapping plc; 2011 Map: © 2021 Maxar Technologies; and 2021 Map: September 2021 © 2021 Maxar Technologies.

**9.15** Only one of the developments that took place after 2011 in these three fields between the Smarden Road and Love Lane had planning permission prior to its introduction. Headcorn Parish Council is keen to prevent this type of high density, uncontrolled development from happening in future.

**9.16** To achieve this it is looking to set rules that will limit the amount of development that can take place within historic field boundaries. Therefore, outside development covered by strategic allocations, permitted development rules and community self-build schemes, any permission for new dwellings in the countryside should be limited to ensure there will be at most two houses or gypsy and traveller pitches within any field boundary (where the field boundary is the one in existence in 1948).

### **9.iii Mix of dwellings**

**9.17** Reflecting the preferences of residents, one of the five high-level policy objectives underpinning the Vision for Headcorn's Neighbourhood Plan is that development in the Parish is managed in a way that is capable of meeting the needs of local residents in different age groups and family units.

**9.18** This desire for developments to provide accommodation that will support different family groups and units is reinforced by the responses to individual questions. Over 60% of the residents who responded to the 2021 Headcorn Residents' Survey saw sheltered accommodation for those in need of extra care or support (either to buy or to rent) as a high or medium priority. In addition, affordability was the main reason cited for why emerging households had not left home, with the majority of emerging households wanting either one or two bedrooms. However, only 29.3% of households were living in properties with at most two bedrooms in Headcorn at the time of the 2021 Census, significantly lower than the proportion for Maidstone Borough as a whole, where properties of at most two bedrooms accounted for 36.3% of household accommodation. This may explain why they may be struggling to find affordable accommodation to meet their needs.

**9.19** In addition, variety is a key element underpinning Headcorn's sense of place. It is noticeable that the more successful of the larger developments in Headcorn typically include a variety of different styles, orientations and designs.

**9.20** For these reasons, Headcorn's Neighbourhood Plan seeks to ensure that all major developments are mixed developments, both in terms of design and the type of households they cater for. This will be beneficial, as it will help to both preserve and enhance the character of Headcorn village, and also to promote healthy communities, by encouraging a mix of different family sizes and age groups.

**9.21** By virtue of their size, major developments have a bigger negative impact if they fail to incorporate more variety, both in terms of design and also in terms of the type of household they cater for. A major development is defined in the 2023 National Planning Policy Framework as any development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. Headcorn's Neighbourhood Plan therefore uses this threshold to determine at what point developers should be required to address this

need for diversity. However, where possible developers of smaller sites are also encouraged to incorporate similar thinking into their proposals.

### **9.iii.a Affordable housing and homes for emerging households**

**9.22** One factor contributing to the mix of homes that should be provided in major developments are the rules around the provision of “affordable housing”. In planning terms affordable housing is not simply a home that someone can afford. Instead affordable housing only covers specific types of housing. In particular, the 2023 National Planning Policy Framework defines affordable housing as housing for sale or rent for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers) and which complies with one or more of the following definitions:

- Affordable housing for rent;
- Starter Homes;
- Discounted market sales housing; and
- Other affordable routes to home ownership.<sup>31</sup>

**9.23** Policy SP20 in Maidstone’s 2017 adopted Local Plan sets out that in rural service centres such as Headcorn affordable housing should make up 40% of the housing provision in developments of 11 or more residential units. In addition, it sets an indicative target for tenure of 70% of this provision being made up of affordable rented housing, social rented housing or a mixture of the two, but the actual tenure split will be determined following consultation and taking into account the evidence available at the time.

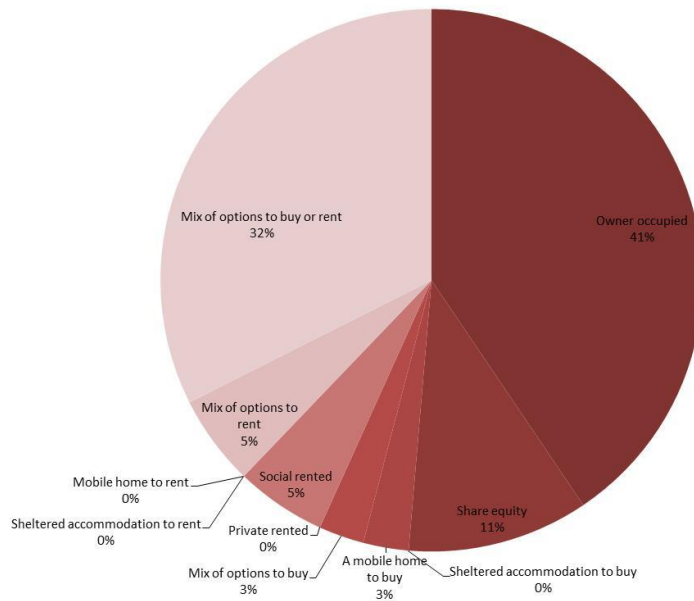
**9.24** Affordable housing provision is one route to meet the needs of emerging households in Headcorn, which makes it important that the tenure mix of affordable housing in Headcorn will serve the needs of the local population. The evidence from the 2021 Headcorn Residents’ Survey suggests a strong preference amongst emerging households for a property to buy, see Figure 42. In total 58% of emerging households picked options to buy as the only type of accommodation they wanted, with a further 32% being willing to consider options to either buy or rent.

**9.25** Demand for housing meeting the definitions of either affordable housing to rent or to buy amongst emerging households was relatively low. However, reflecting the overall preference for a property to buy, where these types of accommodation represented the sole preference of emerging households, 11% picked share equity (affordable housing to buy) and 5% picked social rented housing (affordable housing to rent). In other words, demand for affordable housing to buy was double the demand for affordable housing to rent where it was the only option considered. However, some emerging households would be willing to look at a range of different options. Analysis of the share of emerging households that would consider either affordable housing to rent or to buy or both amongst the options they would consider shows that demand was split evenly between the two types of affordable housing.

---

<sup>31</sup> See Appendix 1 and the NPPF for more details.

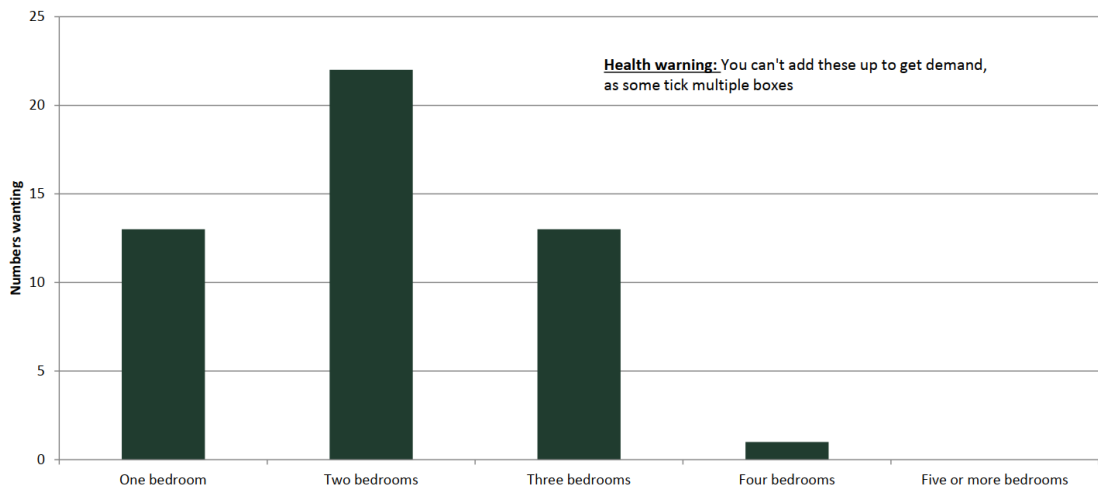
**Figure 42: Tenure preferences amongst emerging households in Headcorn**



**Note:** Results from 2021 Headcorn’s Residents’ Survey. Tenure preferences for emerging households wanting to stay in Headcorn.

**9.26** There is also a strong preference for smaller houses amongst emerging households in Headcorn.

**Figure 43: Preferred size of property amongst emerging households in Headcorn, 2021 Residents’ Survey**



**Note:** Results from 2021 Headcorn’s Residents’ Survey. Size preferences for emerging households wanting to stay in Headcorn.

**9.27** It is important that housing provision in Headcorn reflects these demand patterns, in order to ensure that it will best meet the needs of emerging households in Headcorn. Headcorn’s Neighbourhood Plan therefore seeks to ensure that, where there is a

requirement for affordable housing to be provided as part of a development in Headcorn, at least half of the provision of affordable housing will be affordable housing to buy. The full range of options that meet the definition of affordable housing to buy is set out in the 2023 National Planning Policy Framework (see also the definitions in Appendix 1 of this Plan). Under Headcorn's Neighbourhood Plan where possible the affordable housing options to buy should focus on options to help first time buyers, such as starter homes.

**9.28** Headcorn Parish Council notes that its choice of the tenure mix for affordable housing also reflects sustainability considerations, particularly the social and economic aspects of sustainability. Headcorn Parish Council considers that the sustainability analysis conducted to inform its early Neighbourhood Plan work remains valid.<sup>32</sup> This analysis concluded that time, cost and distance would all act as barriers, creating problems for occupants of affordable housing in Headcorn.<sup>33</sup> This would be particularly true for new residents who had no previous link to the village and would be a considerable distance from support networks, such as family and friends, as well as key public sector infrastructure, such as benefit offices or hospitals.

**9.29** Headcorn Parish Council considers that delivery of a high target level of affordable housing to rent, as required under Maidstone's Local Plan, combined with the high housing numbers envisaged, has the potential to create social deprivation in areas like Headcorn.<sup>34</sup> In practice, these concerns are reinforced by the results of Headcorn's 2023 Regulation 14 consultation, in which a significant number of respondents flagged antisocial behaviour by residents of the new affordable housing to rent. Headcorn Parish Council notes that, in discussions, affordable housing providers operating in Headcorn often suggest that they struggle to fill affordable housing to rent in the village due to limited demand.<sup>35</sup>

**9.30** Sustainability considerations therefore reinforce Headcorn Parish Council's decision to prioritise the needs and preferences of emerging households in Headcorn in deciding on the desired tenure split for affordable housing.

---

<sup>32</sup> For full details, see the analysis in Driver (2014).

<sup>33</sup> As Policy Map HNP3 demonstrates, Headcorn is a considerable distance from all urban settlements. Table 1 of this Neighbourhood Plan highlights the significant cost of travel from Headcorn for those looking to work elsewhere. There is also a significant time cost associated with travel from Headcorn to key employment centres. Travel to all the local population and employment centres have journeys of at least 30 minutes in rush hour, well over the national average of 24.5 minutes. As the analysis in Manning and Petrongolo (2011) demonstrates distance, time and cost are key disincentives for those looking for work. Similarly, the closest secondary school to Headcorn is 11.4km away and, for those without access to their own transport, journey times by public transport to all the closest schools are over 45 minutes and require at least one change. This is likely to limit parental involvement in schooling, as well as children's ability to take part in after school activities, to the detriment of the education of affected children.

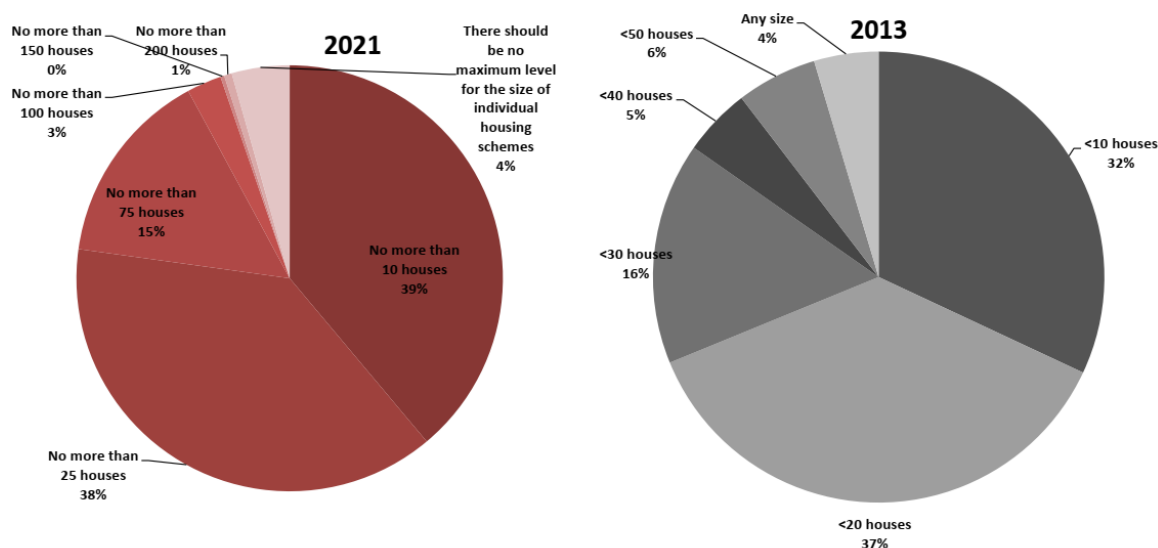
<sup>34</sup> This problem is exacerbated by the scale of development under Maidstone's 2017 Local Plan, which has resulted in around 170 new social houses being built within Headcorn – an increase of 143% in social housing within the Parish compared to the 2011 Census.

<sup>35</sup> For those without a personal reason for living in Headcorn, being located in a relatively remote area like Headcorn risks creating far more problems than it solves. It is noticeable that when canvassed in 2014, 72% of families in the Hardwicks development of 25 social housing units said that they would like to move out if they could. This may also reflect other issues, such as problems with noise because of how the development is laid out. However, it supports the idea that affordable housing to rent in Headcorn is unpopular with tenants, particularly amongst those with no connection to the Parish – less than half of the families housed in the Hardwicks had a local connection, because most local residents who expressed an interest did not qualify.

## 9.iv Size of development

**9.31** Headcorn’s residents have a very strong preference for small scale developments, see Figure 44. The 2021 Residents’ Survey showed that almost 80% of residents would prefer individual developments to be at most 25 houses. Similar results were obtained in the 2013 Residents’ Survey. This preference for small scale development reflects historic development patterns within the Parish, and therefore Headcorn’s sense of place.

**Figure 44: Preferred development size**



**Note:** Results from the 2021 and 2013 Residents’ Surveys to the Question: How big should individual housing development schemes in Headcorn village be? [Tick One].

**9.32** However, as well as shaping development in the way that Headcorn residents would like, there are sensible planning and social reasons for looking to support small scale development:

- Small scale development will enable proper integration of new residents to take place, maintaining social cohesion and avoiding the “them and us” situation of a large-scale housing development. It will also be more sustainable, because it means that development is more likely to match the evolution of the local jobs market, reducing the need for new residents to commute long distances and therefore making it easier to absorb any expansion in the village.
- A key part of the Vision for Headcorn in this Plan is to keep a sense of being a “village”, which was a strong theme to emerge from consultations with residents. To maintain this “village feel” it is essential to retain the pattern of gradual organic growth that has occurred in Headcorn over the past centuries and more recent decades. The housing stock in Headcorn has evolved slowly over time, through a series of small developments, at different sites, and this variety is a key part of Headcorn’s sense of place.
- Another important theme of the Neighbourhood Plan is the desire for new developments to be varied, making use of appropriate materials to reflect the diversity and interest of the many listed buildings in the High Street and throughout the Parish.

This is best achieved by different architects and designers being responsible for a series of small scale developments, not a single, monolithic estate built by one developer.

- Having development evolve as a series of small scale developments will make it easier for the housing stock to adjust to changing circumstances, as it is difficult to anticipate accurately what housing needs will be in 10 to 15 years.
- Small scale developments are also a better match to the pattern of demand in Headcorn. Discussions with local estate agents in 2013 revealed that they struggled to sell houses in developments of over 30 houses. Anecdotally it was also hard for developers to sell the houses in the larger developments that were given planning permission in the recent past, including those in strategic housing allocations within Maidstone's Local Plan. This possibly reflects the fact that people looking to live in a rural village location are more likely to want small scale developments, in order to better enjoy the village experience.
- It is also harder to account properly for the cumulative impact of development and to plan for the sustainability implications and the infrastructure needed to support larger developments, where they take place outside the planning policy development process associated with introducing a Local Plan.
- Finally, as well as being both more sustainable and what residents want, it is also clear that there are no concerns over the viability of small developments in Headcorn. Historically, the vast majority of housing developments in Headcorn were small scale. For example, of the 39 schemes that were given planning permission between 2006-7 and 2014-15 only one development was for more than 25 dwellings, and that was a development of 44 houses on a brownfield site. This clearly indicates that there is no reason to be concerned that developments of 25 dwellings or less cannot be successful within Headcorn.

**9.33** For these reasons, except for developments which are strategic site allocations within an adopted Maidstone Local Plan, Headcorn's Neighbourhood Plan seeks to ensure that new developments will be at most 25 dwellings. In exceptional cases there may be an argument for allowing a development that is larger than 25 dwellings. However, in these circumstances, such a development must demonstrate that it brings significant benefits to existing residents in the form of infrastructure improvements within the Parish. Such benefits could, for example, include the provision of significant community or recreational spaces, or addressing known infrastructure needs, such as improving the water supply, sewerage provision or road safety.

**9.34** The other factor determining the size of development in Headcorn is where it is located. In general, outside strategic allocations within the adopted Local Plan, or on a site immediately abutting the village boundary (as set out in the adopted Local Plan), development in the countryside surrounding Headcorn village will not normally be permitted. Therefore, unless a development immediately abuts an existing development that is within the village boundary (as set out in the adopted Local Plan) it would not typically be allowed. Where exceptions are allowed they will be confined to: micro developments of one or two dwellings; developments that occur under permitted development rights; and community self-build projects of at most nine dwellings for

schemes that involve individuals with strong links to Headcorn Parish. The reason for limiting community self-build schemes in the countryside to at most nine dwellings is to ensure that no major developments are permitted in the countryside surrounding Headcorn village.



## HNP Policy 5: New dwellings

- I. This policy covers all dwellings, in other words places where people live, including housing and gypsy and traveller development in Headcorn. New development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted providing it:
  - I.1. creates garden spaces that will:
    - i. be appropriate for the size and type of the dwellings;
    - ii. work well for the intended inhabitants both now and in the future;
    - iii. help create an attractive overall environment within the development; and
    - iv. where the new dwelling is located within the countryside, involve limited loss of agricultural land;
  - I.2. will be at a minimum density of 15 dwellings per hectare (except for micro developments where lower densities may be permitted) and does not exceed a density of 30 dwellings per hectare, unless it can be demonstrated that innovative solutions will support higher densities without undermining landscape quality in keeping with developments within Headcorn Parish. Precise density should be determined by site characteristics and allow for pedestrian/cycle routes, landscape buffers, open space and protection of important features such as ponds, hedgerows and trees; and
  - I.3. immediately abuts an existing development that is part of the village boundary (as set out in the adopted Local Plan), or demonstrates that the reason it cannot abut an existing development within the village boundary is due to physical constraints, such as flood risk or recreational areas used by the community. This will help ensure that the village retains its distinctive compact shape. Outside strategic allocations within the adopted Local Plan, the only exceptions allowed to this will be:
    - i. micro developments (of one or two dwellings) that meet the conditions for rural dwellings set out in the National Planning Policy Framework<sup>36</sup> and the adopted Development Plan for Headcorn. Outside development covered by strategic allocations, permitted development rules and community self-build schemes, any permission for new dwellings in the countryside should be limited to ensure there will be at most two houses or gypsy and traveller pitches within any field boundary (where the field boundary is the one in existence in 1948);
    - ii. developments allowed under permitted development rules; or
    - iii. community self-build projects of at most 9 dwellings for schemes that involve individuals with strong links to Headcorn Parish coming together to organise the design and construction of their new homes directly (either building the homes themselves, or working through subcontractors) and

<sup>36</sup> See Paragraph 84 of the NPPF published in December 2023.

where it can be shown that it was not possible to secure suitable land abutting the village boundary (as set out in the adopted Local Plan).

- II. In the case of developments in Headcorn of ten or more dwellings, new development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted providing:
  - II.1. it includes buildings that are in a variety of different styles, orientations and design;
  - II.2. the development includes some smaller properties, particularly properties to buy, that will better meet the needs of emerging households;
  - II.3. it provides communal open and recreational space within the development (this may be for allotments, sports pitches, children, amenity space, etc). The provision of a commuted sum to contribute to these facilities elsewhere will not normally be acceptable, unless the developer helps procure a suitable alternative site within the Parish. Headcorn Parish Council will take responsibility for the maintenance of these areas if required;
  - II.4. it incorporates a proportion of housing specifically designed to meet the needs of the elderly and those with disabilities. This could be in the form of sheltered accommodation, or adapted housing, which through its design will facilitate people's ability to remain independent for as long as possible;
  - II.5. where there is a requirement to provide affordable housing (as defined in the National Planning Policy Framework), the provision of affordable housing should favour affordable housing for purchase, as opposed to affordable housing for rent. At least half of the affordable housing units provided should be for purchase, particularly for first time buyers, through schemes such as: First Homes, starter homes, discounted market sales housing, shared equity, or a similar scheme that aims to promote home ownership. Developers will be expected to work with Headcorn Parish Council to try and ensure these homes are allocated to those with a local connection; and
  - II.6. it creates a mixed development that caters for all age groups and abilities, in order to promote the type of healthy community envisaged in the National Planning Policy Framework, unless there is a compelling reason (such as the economic viability of providing sheltered housing).
- III. Outside the strategic allocations set out in the adopted Local Plan, Headcorn's Neighbourhood Plan seeks to promote small scale development, in keeping with Headcorn's rural setting and historic development patterns. Therefore, unless it is part of the adopted Development Plan for Headcorn, any development should normally be a maximum of 25 dwellings. Any exceptions to this must demonstrate that it brings significant benefit to existing residents in the form of infrastructure improvements within the Parish. Such benefits could, for example, include the

provision of significant community or recreational spaces, or addressing known infrastructure needs, such as improving sewerage provision or road safety. In addition, any such development should also otherwise accord with the policies set out in the adopted Development Plan for Headcorn, and particularly the policies within Headcorn's Neighbourhood Plan.

- IV. Major developments (of 10 or more dwellings) will not normally be permitted in the countryside surrounding Headcorn village unless the site is immediately adjacent to the village boundary (as set out in the adopted Local Plan), or is a strategic allocation set out in the adopted Development Plan for Headcorn.

## 10. THE ECONOMY

**10.1** Having a strong local economy is important for the economic wellbeing of local residents and will help promote sustainability, by reducing the need for residents to travel elsewhere to either work or shop. This is particularly true in areas such as Headcorn, which are geographically far from local centres, see HNP Policy Map 3.

**10.2** Ensuring that Headcorn is supported by a vibrant economy is therefore a key goal of Headcorn's Neighbourhood Plan. However, it is also important that business development is managed in a way that not only maximises its potential, but also minimises any harm, in order to balance both the opportunities and potential externalities (i.e. where the impact of any development will not be fully captured by the cost of the development itself).<sup>37</sup> Headcorn's Neighbourhood Plan Policy HNP6 aims to achieve this in four ways by setting:

- the overarching rules governing any form of business development within the Parish, in order to ensure that businesses will be good neighbours and are in keeping with their rural setting;
- the rules for retail development in a way that seeks to promote and protect a key asset for the Parish, namely Headcorn High Street;
- the rules for development at Headcorn Aerodrome, which is associated with some specific opportunities and challenges; and
- the rules for commercial energy generation, in order to ensure that such projects properly take into account their impact on the landscape.

### 10.i Supporting business development in Headcorn

**10.3** Headcorn is supported by a diverse economy, predominantly centred around small businesses, with no one employer dominating opportunities within the Parish. Excluding farm agriculture, businesses in Headcorn supported around 1,150 jobs in 2020. In terms of geographic spread, around 40% of the jobs in the Parish were centred on the village itself, with the retail and health sectors being the two largest sources of jobs in the village, each accounting for around 17% of jobs in the village. Outside the immediate village, manufacturing provided the largest source of employment, accounting for 21.4% of roles outside the village and 14.8% of roles for the Parish as a whole. Around 65% of roles in the Parish were full time, and part time roles were split evenly between the village and the wider Parish, meaning there was a higher proportion of part time roles in the village than elsewhere.<sup>38</sup>

**10.4** Policy HNP6 covers development by all businesses operating in Headcorn Parish, whatever their sector or business use class. The aim of the policy is to ensure that new

---

<sup>37</sup> Pollution is a typical example of externalities, as unless a polluter can be made to pay the full costs associated with any pollution, including the impact of pollution on others, their assessment of costs versus benefits will be skewed.

<sup>38</sup> Estimates for employment are taken from the ONS's Business Register and Employment Survey for 2020. The geographic units used are: the Maidstone super output area lower layer Maidstone: 017A for Headcorn Parish excluding the village; and the Maidstone super output area lower layer Maidstone: 017B for Headcorn village.

business development in Headcorn is an asset to the Parish. To achieve this, it aims to ensure that business development:

- is appropriate for a rural setting;
- respects the needs of any neighbours, for example by minimising negatives such as noise and light pollution;
- does not undermine Headcorn's sense of place, in other words that it reflects the scale and height and form of surrounding buildings, as well as the character of the local area, and is supported by signage and shop frontages that are appropriate for their setting; and
- makes effective use of existing buildings wherever possible.

## **10.ii Promoting the role of Headcorn High Street**

**10.5** The Vision underpinning Headcorn's Neighbourhood Plan places significant emphasis on the role of the High Street in supporting a vibrant local economy.

**10.6** Headcorn High Street is central to life in the Parish. It supports a significant proportion of the businesses operating within the Parish and represents an important source of employment opportunities for residents. Furthermore, the existence of a vibrant and attractive High Street is not just important for businesses on the High Street itself, but can also help support businesses elsewhere in sectors such as tourism, for example.

### **Figure 45: Remembrance Day parade on Headcorn High Street**



**10.7** As well as being important for the economic success of the Parish, Headcorn High Street is also visually attractive and many of the buildings along it are historically significant. The centre of Headcorn Village is designated a Conservation Area and a number of buildings within the Conservation Area are themselves listed. In addition part of

Headcorn's Conservation Area, including parts of the High Street, are also covered by an Article 4 Direction.

**10.8** Having a good range of shops and businesses is an important part of encouraging customers to shop in the High Street. In general Headcorn Parish Council considers that it is important to ensure that the retail options in the Parish are concentrated on the High Street itself to ensure it continues to flourish. A key role for Headcorn's Neighbourhood Plan is therefore to try and ensure that the policy framework will help support the continued success of the High Street. To achieve this, the policy framework within the Neighbourhood Plan aims to ensure that: new retail developments will help support the rural economy; development will not take place that would be of a sufficient scale to undermine the viability and vitality of the High Street; and that the conversion of the ground floor of retail and business premises on the High Street to domestic use will not take place.

**10.9** Under the Neighbourhood Plan no new retail units, or retail warehouse developments will be allowed in the Parish, if they would be of a sufficient scale that they could risk undermining the vitality and viability of the High Street. Therefore, away from the High Street itself new retail and retail warehouse development will only be permitted where the nature of the business is appropriate for Headcorn's rural location. An example of the type of business that would be allowed is a nursery or farm shop, while an out-of-village retail-park, for example, would not be appropriate for Headcorn's location.

**10.10** In order to ensure the High Street continues to thrive, it is also important that there is a good range of business units available for use. The General Development Orders confer certain rights on building owners. For example, subject to certain conditions, change of use can take place without the need for planning permission. However, the exceptions to this are buildings located in Conservation Areas or individually listed as being of architectural or historic importance.

**10.11** The policy on promoting the High Street in Headcorn's Neighbourhood Plan includes a presumption against permitting change of use for ground floor retail and business units on the High Street into dwellings. This approach is supported by residents. However to provide some flexibility, the policy will only apply to the ground floors of buildings in the Conservation Area and will not to apply to the upper parts of buildings otherwise in retail use.

**10.12** Given the importance of the High Street for Headcorn, it is not just this policy that is designed to help support it. For example, Policy HNP3 covering connectivity and access also tries to support the role of the High Street by ensuring that new developments will promote and enhance links to the High Street that can be accessed by foot and cycle. In addition, the vast majority of housing in Headcorn is within 800m of the centre of the High Street, or roughly a 10 minute walk, and Headcorn's Neighbourhood Plan aims to support the compact shape of Headcorn village through its policy on new dwellings (Policy HNP5).

### 10.iii Headcorn Aerodrome

**10.13** Headcorn Aerodrome is also known as Lashenden Airfield. The Aerodrome is based at Shenley Farm, and was first used by one aircraft in the 1920s, before serving as an advanced landing ground for Canadians and then Americans in World War II. Today, as a private civil airfield and parachute centre, it also houses an Air Warfare Museum, the Air Cadets of 500 Squadron and a helicopter company, together with 10 other aviation and tourism related businesses. The aerodrome currently consists of around 5500m<sup>2</sup> of built space, together with the associated airfield runways.

**Figure 46: Headcorn Aerodrome**



**10.14** The Aerodrome is an important part of the local economy and helps put Headcorn on the tourist map, both through flying and parachuting activities, as well as the annual Air Show. Headcorn Aerodrome is also an important heritage asset. However, its presence in the Parish does create some tensions, with around a third of residents worrying about aircraft noise. In addition, the absence of footpaths on the section of the A274 south of the village renders the aerodrome unsuitable for safe pedestrian access, resulting in a high dependency on motor vehicle access.

**10.15** The Aerodrome has permission to operate as it currently is and this will not change. However, the Neighbourhood Plan is about planning for the future. Therefore, the question is if, for example, the owners of the Aerodrome wanted to expand the type of flying that was possible (by changing the runway to a solid surface to allow larger aeroplanes to land and take off) should this be permitted?

**10.16** On balance, it is considered that the right policy mix is to support the Aerodrome as a tourist attraction operating under its existing rules, with the vast majority of residents supporting this approach. This would allow for the upgrading of facilities to support tourism activity, providing these will not significantly increase noise levels, but would involve

maintaining a grass (rather than hard surface) runway, to ensure it remains a home for smaller light aircraft. Where possible, Headcorn Parish Council would like to encourage the introduction of noise reduction measures associated with the use of the Aerodrome.

#### **10.iv Commercial energy generation**

**10.17** There is a global need for sustainable energy and the UK government is committed to achieving green energy targets. In order to support the UK government's commitments to green energy targets, as set out in policy HNP4, new developments in Headcorn (including commercial developments) will be encouraged to invest in green energy generation options and energy efficiency to help boost Headcorn's contribution.

**10.18** However, green energy generation does not necessarily need to be confined to supporting individual homes and businesses within the Parish. It can also be done on a commercial scale. Between 2010 and 2015, several proposals for large scale commercial green energy generation were proposed in the Headcorn region involving large solar energy farms. These generated considerable local opposition, and led to the formation of vocal protest groups. This concern was understandable given:

- large solar farms can be visually intrusive; and
- are likely to reduce, not increase, the number of local jobs available, both by reducing the amount of farmland under cultivation (and hence the number of agricultural jobs) and by undermining Headcorn's ability to generate tourist income. (Large solar farms are not the backdrop tourists usually look for when deciding on where to stay.)

**Figure 47: View towards Headcorn church from Moat Road - the topography means that features such as pylons can be visually intrusive**



**10.19** Therefore, it is clear that commercial energy generation projects bring specific challenges, in terms of land use, because of the need to address their visual impact.



**10.20** All business development in Headcorn (including any commercial energy projects) will be covered by the requirements in paragraphs 1-5 of Policy HNP6. However, reflecting the specific issues associated with commercial energy generation projects, Section C of that policy also sets specific rules governing the siting of commercial energy generation projects, including the siting of any necessary supporting infrastructure such as pylons, in order to minimise the visual impact of any projects of this nature.

## **HNP Policy 6: The Economy - supporting business development in Headcorn**

This policy is the overarching policy covering all business activities in Headcorn Parish. Reflecting Headcorn's rural location, it is designed to support small and medium-sized enterprises in the Parish, including farms. Business development in Headcorn, in accordance with the Neighbourhood Plan, will be permitted where it:

1. involves the conversion of an existing permanent building, or demonstrates that any existing structures on the site are inappropriate for conversion and that there will be significant benefit associated with allowing a new building;
2. respects the scale, height and form of existing surrounding buildings, together with the character of the surrounding area, to help it blend with the landscape and will have signage and shop frontage that is appropriate for its setting;
3. can be demonstrated that the development is in keeping with Headcorn's rural character;
4. safeguards the privacy and daylight of adjoining residents and will not result in unacceptable levels of light, noise, air, ground or water pollution; and
5. can be shown to otherwise comply with the policies within this Neighbourhood Plan covering issues such as design; connectivity and access; infrastructure; and siting, landscaping and protecting the natural and historic environment.

### **A. PROMOTING THE ROLE OF HEADCORN HIGH STREET**

In addition to the overarching policy above, in relation to retail and retail warehouse units within Headcorn Parish and retail and business units located on Headcorn High Street, new development in Headcorn, in accordance with the Neighbourhood Plan, will be permitted provided it:

- A.1 will help support the rural economy (for example farm shops);
- A.2 would not result in a change to residential use for the ground floor of a building within the village Conservation Area from any of the retail or business use classes; and
- A.3 would not create a retail or retail warehouse development that would be of a sufficient scale that it could risk undermining the vitality and viability of the High Street, which is the established retail and business centre of the village.

### **B. HEADCORN AERODROME (AVIATION AND TOURISM)**

In addition to the overarching policy above, in relation to Headcorn Aerodrome, planning permission for modest, proportional development at Headcorn Aerodrome will be allowed

for tourism and aviation related uses, providing any such development:

- B.1 will not cause a significant increase in the noise associated with the operation of the airfield;
- B.2 is in keeping with Headcorn's rural setting and its status as a heritage asset; and
- B.3 is subject to the same strict regulations imposed on the current use of the airfield.

Depending on the proposed development, further conditions may be imposed to ensure that such continuing and further uses do not impact adversely on the neighbouring and surrounding residential settlements.

Planning permission will not be granted to upgrade the runway from grass to hard surface.

### **C. COMMERCIAL ENERGY GENERATION IN HEADCORN**

In addition to the overarching policy above, in relation to all commercial green energy generation projects in Headcorn, new commercial green energy generation development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted providing:

- C.1 The development does not require the installation of new pylons to connect the project to the national grid, as these would be visually intrusive in the Low Weald landscape;
- C.2 It will not undermine the distinctive views to and from the nearby Greensand Ridge; and
- C.3 The screening and landscaping of the development will minimise its visual impact.

In addition, a planning condition should be included in any permission that will ensure that any land used for the development will be restored to its rural character once any development has reached the end of its life. Therefore adequate funding will need to be provided upfront to ensure that this is possible.

## APPENDIX 1: LIST OF ABBREVIATIONS AND DEFINITIONS

Affordable Housing	<p>The National Planning Policy Framework defines <b>Affordable housing</b> as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers) and which complies with one or more of the following definitions:</p> <ul style="list-style-type: none"><li>• Affordable housing for rent;</li><li>• Starter homes;</li><li>• Discounted market sales housing; and</li><li>• Other affordable routes to home ownership.</li></ul>
Affordable housing for rent	<p>The NPPF defines <b>affordable housing for rent</b> as housing that meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p>
Affordable housing to buy	<p>The NPPF defines <b>affordable housing to buy</b> as housing that meets one or more of the following definitions:</p> <ul style="list-style-type: none"><li>• Starter homes;</li><li>• Discounted market sales housing; and</li><li>• Other affordable routes to home ownership.</li></ul>
ANGSt	Accessible Natural Green Space
Article 4 Direction	A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.
ASHE	Annual Survey of Hours and Earnings. Data published by the Office for National Statistics.
CIL	Community Infrastructure Levy.
Community self-build scheme	For the purposes of Headcorn’s Neighbourhood Plan a community self-build scheme is a scheme where a group of individuals with strong links to Headcorn Parish come together to organize the design and

	<p>construction of their new home directly, either by building the house themselves, or working with subcontractors. The maximum size of a Headcorn community self-build scheme will be nine dwellings.</p>
Custom-build housing	<p>Custom-build housing, including self-build, is housing commissioned and built by individuals, or groups of individuals, for their own use, either by building the home on their own or by working with a builder, contractor or package company.</p>
DCLG	<p>Department for Communities and Local Government. <b>Now DLUHC.</b></p>
Defra	<p>Department for Environment, Food and Rural Affairs</p>
Development Plan	<p>Development Plans are defined in Section 38 of the Planning and Compulsory Purchase Act (2004). A development plan for an area will include the adopted local plan, any neighbourhood plan that has been made and published spatial development strategies, together with any regional strategic policies that remain in force. Neighbourhood plans that have been approved at referendum are part of the development plan for that area, unless the local planning authority decides that the neighbourhood plan should not be made.</p>
Discounted market sales housing	<p>Affordable housing defined as <b>Discounted market sales housing</b> in the NPPF is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</p>
DLUHC	<p>Department for Levelling Up, Housing &amp; Communities. [Formerly the Department for Communities and Local Government (DCLG) and the Ministry for Housing, Communities and Local Government (MHCLG)].</p>
Dwelling	<p>For the purposes of Headcorn’s Neighbourhood Plan, a <b>dwelling</b> is defined as either any building, or part of a building, that is suitable for occupation by a single household unit, or a gypsy and traveller pitch that is (or will be) occupied by one household. A building that consisted of two flats, for example, would count as two dwellings. Similarly, a building for shared occupation (where occupants, who are not part of the same family unit, share communal facilities, but have their own bedrooms) will be counted as having the same number of dwellings as there are bedrooms.</p>
First Homes	<p>First Homes are a government initiative (<a href="https://www.gov.uk/guidance/first-homes">https://www.gov.uk/guidance/first-homes</a>) and are a specific kind of discounted market sale housing and should be considered to meet the definition of ‘affordable housing’ for planning purposes. Specifically, First Homes are discounted market sale units which:</p>

- a) must be discounted by a minimum of 30% against the market value;
- b) are sold to a person or persons meeting the First Homes eligibility criteria;
- c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,
- d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).

First Homes are the government’s preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

Gypsies and travellers For planning purposes, National Planning policy defines “gypsies and travellers” as: persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are “gypsies and travellers” for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

Gypsy and traveller pitch For the purposes of Headcorn’s Neighbourhood Plan a gypsy and traveller pitch is treated as a dwelling and is defined as a site (or part of a site) that is (or will be) occupied by one household, where the occupants meet the definition of gypsies and travellers provided above.

Isolated location For the purposes of this Neighbourhood Plan an isolated location is defined as a location that is not within 200 metres of at least two established dwellings.

KCC Kent County Council

KMWLP Kent Minerals and Waste Local Plan (<https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/housing,-regeneration-and-planning-policies/planning-policies/minerals-and->

waste-planning-policy/kent-minerals-and-waste-local-plan-kmwlp). Headcorn Parish includes sites containing safeguarded land-won minerals. The KMWLP contains the relevant policies that apply for decision-making for sites where these deposits are found.

Local Plan	A plan for the development of a local area drawn up by the local planning authority in consultation with the community. In law, once it passes examination and is adopted, this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act (2004). A local plan can consist of either strategic or non-strategic policies, or a combination of the two.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area. In the case of Headcorn, the Local Planning Authority is Maidstone Borough Council.
Low Weald Landscape of Local Value	The Low Weald Landscape of Local Value is defined in Policy SP17 of the Maidstone Borough Local Plan that was adopted in October 2017. It covers much of Headcorn Parish. The designation means the distinctive landscape and character of the Low Weald should be conserved and enhanced.
LPA	Local Planning Authority
Maidstone Borough Local Plan	The Local Plan for Maidstone Borough refers to the plan adopted by the Local Planning Authority, which is Maidstone Borough Council. The adopted Local Plan forms part of the Development Plan for Headcorn Parish. For the purposes of Headcorn Neighbourhood Plan, unless otherwise specified, the term Maidstone Borough Local Plan refers to whichever is the most recently adopted Local Plan for Maidstone.
Major development	For housing a major development is defined in the NPPF as a development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m <sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
MBC	Maidstone Borough Council
MHCLG	Ministry for Housing, Communities and Local Government. <b>Now DLUHC.</b>
Micro development	For the purposes of Headcorn's Neighbourhood Plan, a <b>Micro</b>

**development** is a development consisting of up to two dwellings.

Neighbourhood Plan	A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law it is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act (2004). Once it is made, a Neighbourhood Plan forms part of the Development Plan for the local area.
NPPF	National Planning Policy Framework
Other affordable routes to home ownership	Affordable housing defined in the NPPF as <b>Other affordable routes to home ownership</b> is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.
PRoW	Public Right of Way: A way over which the public have a right to pass and repass, including Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic.
ROWIP	Rights of Way Improvement Plan. An initiative by Kent County Council to improve PRoW ( <a href="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</a> ).
RSC	Rural Service Centre
SEA	Strategic Environmental Assessment. A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
Self-build and custom-build housing	Self-build and custom-build housing is defined in the NPPF as housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.
SFRA	Strategic Flood Risk Assessment



Social rented housing	The 2012 NPPF defined Social rented housing as housing that is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.
SSSI	Site of Special Scientific Interest. Sites are designated by Natural England under the Wildlife and Countryside Act 1981.
Starter homes	Affordable Housing defined as <b>Starter homes</b> in the NPPF is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
Stepping stones	Pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.
Strategic Environmental Assessment	A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
Strategic Policies	Policies and site allocations within a Local Plan which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act (2004).
Travelling showpeople	For planning purposes, National Planning policy defines “travelling showpeople” as: members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.
UK NEA	UK National Ecosystem Assessment
Wildlife corridor	Areas of habitat connecting wildlife populations.
Windfall development	Sites that are granted planning permission despite not being specifically identified in the development plan for the local area.

## APPENDIX 2: THE MAKING OF HEADCORN'S NEIGHBOURHOOD PLAN

**11.1** This Appendix sets out the history and background to Headcorn's Neighbourhood Plan; the details of the basic conditions Headcorn's Plan will need to meet in order to pass examination; and the evidence that was gathered to underpin the policy choices within the Plan.

**11.2** The process for introducing a Neighbourhood Plan is set out in the Neighbourhood Planning (General) Regulations 2012 (UK Statutory Instrument 2012 No. 637).<sup>39</sup>

### A2.i Background to Headcorn's Neighbourhood Plan

**11.3** The production of a Neighbourhood Plan for Headcorn has been a long time in the making.

**11.4** Recognising that it could be a potentially powerful tool, Headcorn Parish Council made the decision in October 2012 to prepare a Neighbourhood Plan for Headcorn to help shape any development that would be proposed. Headcorn Parish was designated as a Neighbourhood Area in April 2013. As part of the initial community engagement, the local community chose Headcorn Matters as the name for Headcorn's Neighbourhood Plan project.

**11.5** Following the designation of Headcorn as a Neighbourhood Plan area, significant work was undertaken with the help of volunteers from the wider community, in particular the Headcorn Matters team, in order to produce a draft Neighbourhood Plan. This work included a very significant programme of evidence gathering to support the choice of policies for the Neighbourhood Plan. Headcorn's approach to this was even used as a case study on how to gather evidence to support a Neighbourhood Plan.<sup>40</sup> In addition, policy choices were informed by Neighbourhood Plan policies that had passed examination elsewhere.

**11.6** A draft Neighbourhood Plan for Headcorn was produced in 2015 and Headcorn Parish Council conducted its Regulation 14 Consultation in June 2015, and submitted a revised draft under Regulation 15 in October 2015. The approach of working with local residents and businesses to identify what was needed meant that Headcorn's draft Neighbourhood Plan enjoyed considerable local support. This was demonstrated in the 2015 Regulation 14 Consultation, where 93.9% of residents who responded to the Consultation supported the proposed Neighbourhood Plan.<sup>41</sup>

---

<sup>39</sup> <https://www.legislation.gov.uk/ukSI/2012/637/contents/made>

<sup>40</sup> Headcorn's approach to evidence gathering was used as a case study by Planning Aid to help those undertaking a Neighbourhood Plan to understand some of the issues involved, see <http://www.ourneighbourhoodplanning.org.uk/case-studies/view/314>.

<sup>41</sup> As part of Headcorn's 2015 Regulation 14 Consultation, as well as being given an opportunity to provide general comments on the plan, residents were also asked six specific questions on the plan itself. Question 1 was "Do you support the Draft Neighbourhood Plan?, Yes/No". 93.9% responded yes, 5.2% no and 0.9% gave a qualified yes.

**11.7** However, there were significant delays in the examination process, meaning that an examiner's report for Headcorn's draft Neighbourhood Plan was not issued until March 2017. During this delay Maidstone Borough Council made significant progress in producing a Local Plan for Maidstone: issuing the Regulation 19 Consultation draft in the spring of 2016; proceeding to examination in autumn 2016; and receiving an interim examiner's report on Maidstone's Local Plan in December 2016, with the final report issued in July 2017. This Local Plan proposed far more development in Headcorn than had been the case in the (2000) adopted Development Plan for the area. At the time when Headcorn's Neighbourhood Plan was drafted, the existing Development Plan only allowed minor development in rural settlements such as Headcorn, and had not allocated any specific sites in the Parish. Recognising this policy background, as well as significant support amongst local residents for promoting small scale (rather than large) developments, encouraging small scale development was a key part of Headcorn's 2015 draft Neighbourhood Plan.

**11.8** Differences in the approach to development in Headcorn in the 2015 draft Neighbourhood Plan and the 2016 draft Local Plan meant that Headcorn's Neighbourhood Plan examiner decided that Headcorn's Neighbourhood Plan did not meet the basic conditions. However, recognising the very considerable local support for Headcorn's draft Neighbourhood Plan, Maidstone Borough Council proposed that instead of accepting the examiner's recommendation, there should be a negotiation to try and find a way to allow the Plan to be deemed to have met the basic conditions and proceed to a referendum. Unfortunately this negotiation was not successful, leaving the draft Plan in limbo.

**11.9** However, although the Plan itself was never formally adopted, the evidence gathered to support it successfully identified key issues for the local community and was used by Headcorn Parish Council to achieve change. In particular, the draft Plan identified two preconditions that were needed to support development: the need to ensure that Headcorn Primary School was able to expand in its existing location in the centre of the village; and the need for the sewerage system to be upgraded. Both these have been achieved:

- At the time work first started on Headcorn's Neighbourhood Plan, Headcorn's Primary School was oversubscribed and Kent County Council was looking at a range of options to meet the need for school places, including moving it to a location on the edge of the village and expanding provision in other villages. Using the evidence gathered, Headcorn Parish Council and the Neighbourhood Plan team successfully helped to persuade Kent County Council that the Primary School should instead be expanded to two form entry, and equally importantly that it should do so in its original location.

- Sewerage and storm water drainage was identified in the original residents' survey as a very significant problem for Headcorn. The most obvious manifestation of this was that sewage would emerge at low points in the network during heavy rain, primarily in the Moat Road area. In order to inform the debate and persuade others of the need for change, building on its survey work, Headcorn Parish Council commissioned a study of the sewerage network in Headcorn. This identified that the system had significant problems, including 15 sewage pipes that already had insufficient capacity, 14 sewage pipes that suffered from back-fall and 74 sewage pipes that were not self-cleaning due to inadequate flow.<sup>42</sup> Although not all these issues have been addressed, Southern Water was persuaded by Headcorn Parish Council of the need to upgrade the system at Moat Road, which means that sewage no longer emerges onto the road during heavy rain.

**11.10** In November 2019 Headcorn Parish Council again decided to consider producing a Neighbourhood Plan for the Parish. It set up another steering group to make recommendations. This group concluded that, given its popularity and the huge volume of evidence underpinning it, the starting point for any new Neighbourhood Plan should be the previous Regulation 16 draft, but that work would be needed to ensure that it aligned to the Maidstone Borough Local Plan, which was adopted in October 2017, and that this work would require looking again at the validity of some of the policies. In addition, it was recommended that it would be advisable to undertake another survey of residents, in order to check that the evidence underpinning the previous Plan remained valid.

**11.11** In light of these recommendations, in February 2020 Headcorn Parish Council made the decision to hire Analytically Driven Ltd to undertake the necessary survey work, as well as to help the Parish Council to produce a draft Neighbourhood Plan. However, the onset of the pandemic in March 2020 meant that work was paused.

**11.12** The new Residents' Survey was finally issued to residents in February 2021, with a response deadline of March 14<sup>th</sup> 2021. In general the responses provided strong support for the core policies in the previous draft Plan. In particular, the Vision underpinning the previous draft Plan was overwhelmingly supported by those responding to the survey.<sup>43</sup> There was similarly very strong support for encouraging small scale development, with 77% of respondents wanting individual developments to be at most 25 houses.

**11.13** The 2021 Residents' Survey, as well as engagement with Maidstone Borough Council, has informed the new draft Plan. In consultation with the steering group, the resulting Policy framework has been simplified and condensed.<sup>44</sup> At its core, however, is the Vision that underpinned the previous draft Plan, as this Vision was overwhelmingly supported by those responding to the survey.

**11.14** A draft Neighbourhood Plan was shared with Maidstone Borough Council in March 2022 for comments, as well as with Kent County Council in July 2022. The Plan was

---

<sup>42</sup> Sandersons (Consulting Engineers) Ltd (2015).

<sup>43</sup> 82% of participants in the 2021 Headcorn Residents' Survey supported the draft Vision, with an additional 15% ticking maybe. In total only 3% of residents opposed the draft Vision for Headcorn.

<sup>44</sup> The 2015 draft Neighbourhood Plan contained 34 Policies supporting the Vision for Headcorn.

reviewed in light of these comments, and a revised draft was issued in November 2022 for Maidstone Borough Council to use as the basis for consulting with statutory consultees for a formal decision on whether a Strategic Environmental Assessment is needed. On the basis of these consultations, Headcorn Parish Council was advised by Maidstone Borough Council on 10<sup>th</sup> May 2023 that a formal Strategic Environmental Assessment would not be needed in the case of Headcorn's Neighbourhood Plan.<sup>45</sup>

**11.15** A revised draft Neighbourhood Plan was finalised in June 2023 and formed the basis of the first consultation needed to introduce a Neighbourhood Plan, namely the Regulation 14 consultation.<sup>46</sup> This consultation is also known as the pre-submission consultation, as it is the consultation that takes place before Headcorn Parish Council formally submits the Neighbourhood Plan to Maidstone Borough Council. Headcorn Parish Council is responsible for running and publicising the Regulation 14 consultation in a manner that is likely to bring it to the attention to anyone who lives, works or does business in the Parish. In addition, as part of the process the Parish Council must also consult: Maidstone Borough Council; Kent County Council; all the adjoining Borough and Parish Councils; as well as all the consultation bodies listed in Schedule 1, paragraph 1 of the Regulations. The consultation must run for at least 6 weeks.

**11.16** The Regulation 14 Consultation for Headcorn's Neighbourhood Plan ran from 22<sup>nd</sup> June 2023 until 14<sup>th</sup> August 2023, a seven and a half week period. Headcorn Parish Council received 262 responses to its Regulation 14 Consultation, including 14 from organisations. Headcorn Parish Council is very grateful to everyone who took the time to respond and has carefully considered all the responses.

**11.17** Overall the majority of respondents to the Regulation 14 Consultation strongly supported the approach and policies within the Neighbourhood Plan. However, following careful consideration of the responses, Headcorn Parish Council has made a number of small changes to the Plan, including minor tweaks to some policies. The changes to policies were: HNP3 to add the need to consider the safety of other road users (clause 9); HNP4 to add a requirement for visitor and cycle parking (Part A), references to the water supply (Parts C, E.I and E.II) and transport to the list of priorities for commercial development (Part E.II); HNP5 to add a footnote citing the relevant NPPF paragraph (Part I), add reference to emerging household preferences for properties to buy (Part II), as well as starter homes (Part II) and to clarify that Part IV related to major developments in the countryside; and for HNP6 to recognise that the Aerodrome is also a heritage asset (Part B.2). Headcorn Parish Council does not consider that these changes necessitate a second Regulation 14 consultation, because they are relatively minor and simply reinforce the existing policy framework.

---

<sup>45</sup> This advice is based on the emerging policies in Headcorn's Neighbourhood Plan, and on their discussions with the statutory consultees.

<sup>46</sup> The differences between the November 2022 draft and the June 2023 draft were: an updated timeline, to reflect the delays in obtaining the SEA consultation results; and the updating of some of the background data to reflect the publication of Census 2021 data for Headcorn (using data for Lower layer Super Output Areas E01024364: Maidstone 017A and E01024365: Maidstone 017B, which together make up Headcorn Parish).

## **A2.ii Next steps**

**11.18** Given the strength of support for the Neighbourhood Plan, Headcorn Parish Council is submitted the revised Headcorn Neighbourhood Plan to Maidstone Borough Council under Regulation 15, so that it can go forward to its Regulation 16 Consultation, which is the next step. To accompany the draft Plan, Headcorn Parish Council has prepared a Consultation Statement setting out: the people and bodies that were consulted; how they were consulted; what concerns were raised; how those concerns were considered and, where relevant, addressed in the proposed Neighbourhood Plan. The Parish Council has also prepared a Basic Conditions Statement setting out how the Plan meets the basic conditions that it must meet in order to pass an examination (see Section A2.ii.a for the Basic Conditions associated with Headcorn's Neighbourhood Plan). The Parish Council will submit to Maidstone Borough Council: a map of the area covered by the Plan; the proposed Plan; the Consultation Statement; and the Basic Conditions Statement. Maidstone Borough Council will then publicise the Plan on their website and conduct the second formal consultation on the Neighbourhood Plan, which is the Regulation 16 consultation. This consultation will also last a minimum of 6 weeks.

**11.19** Once the Regulation 16 Consultation has been concluded, the next stage of the process is for the Plan to be sent by Maidstone Borough Council to the examiner for assessment. The examiners role is to test whether the proposed Plan meets the basic conditions set out below. The examiner decides whether or not as part of the examination process it will be necessary for there to be a public hearing as part of the exam process. If there is a public hearing, the examiner decides who will be invited to speak and what questions they wish to be addressed. The examiner will then produce a report setting out their findings, and, in particular, whether or not they recommend that the Plan should go to referendum.

**11.20** Maidstone Borough Council will then need to decide whether they are happy to accept the examiner's recommendations. If Maidstone Borough Council does not accept the examiner's recommendations, then it must notify anyone who submitted consultation responses, as well as any Consultation bodies, of their decision and the reason for it, and invite further representations, which must be submitted within 6 weeks. It can also refer the matter again to independent examination. Once the responses are in, Maidstone Borough Council will then have five weeks to make a final decision.

**11.21** Assuming that the Plan is deemed to have passed its examination, the next step is for Maidstone Borough Council to organise a referendum on the Plan. Anyone who lives in the referendum area, and who is entitled to vote in local elections, is eligible to vote in the referendum. If the majority of those who vote in the referendum are in favour of the draft Neighbourhood Plan, then the Plan is deemed to have passed. Unless there is then a legal challenge, Maidstone Borough Council will need to make the Plan within 8 weeks of the referendum. At that point the Neighbourhood Plan will form part of the Development Plan for the local area, and will have equal status with the policies in the adopted Maidstone Local Plan in decisions on planning applications for Headcorn Parish.

## **A2.ii.a The basic conditions for Headcorn's Neighbourhood Plan**

**11.22** For any Neighbourhood Plan to be adopted its policies have to be deliverable and need to meet certain basic conditions. In particular, it must: have regard to national policies, including the National Planning Policy Framework (NPPF) itself; ensure it contributes to the achievement of sustainable development; ensure it is in general conformity with the strategic policies contained in the development plan for the local area; ensure it does not breach, and is otherwise compatible with, EU obligations; and meets the prescribed matters and prescribed conditions.

**11.23** In the case of the NPPF published in December 2023, key policies include:

- The policies designed to achieve sustainable development set out in Section 2 of the NPPF, including the definition of sustainability set out in Paragraph 8, and the emphasis on the presumption in favour of sustainable development, including the implications of this for plan-making, as set out in Paragraph 11;
- The approach to plan-making set out in Section 3 of the NPPF, including the purpose and impact of Neighbourhood Plans as set out in Paragraphs 29-30, the potential need for a Strategic Environmental Assessment (SEA) set out in Footnote 17 to Paragraph 32, and the background to the basic conditions for a Neighbourhood Plan set out in Paragraph 37;
- The requirements around affordable homes (as defined in the NPPF, which involves homes at below market prices) set out in Paragraphs 64-65;<sup>47</sup>
- The need for Local Planning Authorities to set out a housing requirement for designated Neighbourhood Areas, see Paragraphs 67-68;
- The importance of small and medium sized sites, including the implications for Neighbourhood Plans, as set out in Paragraphs 70-71;
- The policy on rural housing, including the need to avoid isolated homes, set out in Paragraphs 82-84;
- The policy on rural economic development set out in Paragraphs 88-89;
- The policy on retail and leisure development outside town centres set out in Paragraphs 94-95;
- The policies on promoting healthy and safe communities, including policies on promoting inclusivity and social interaction, and open spaces and recreation set out in Section 8;
- The policies on promoting sustainable transport set out in Section 9, including policies on parking standards in Paragraphs 111-112;
- The policy on supporting full fibre broadband connections in Paragraph 118;
- The policy on housing density set out in Paragraphs 128-129;
- The policies underpinning achieving well-designed places set out in Section 12, including the introduction of a national Design Code and National Model Design Code;
- The policies on meeting the challenge of climate change set out in Section 14, including policies on flood risk set out in Paragraphs 165-175;

---

<sup>47</sup> See Appendix 1 for the full definition of affordable homes as set out in the 2023 NPPF.

- The policies on conserving and enhancing the natural environment set out in Section 15; and
- The policies on conserving and enhancing the historic environment set out in Section 16.

**11.24** In the case of Headcorn, the need to be in general conformity with the strategic policies contained in the development plan for Headcorn means the strategic policies set out in the Maidstone Borough Local Plan that was adopted in 2017. For Headcorn, the most relevant strategic Local Plan policies are:

- SS1: Maidstone borough spatial strategy;
- SP5: Rural Service Centres;
- SP7: Headcorn Rural Service Centre;
- SP17: Countryside;
- SP18: Historic Environment;
- SP19: Housing Mix;
- SP20: Affordable Housing;
- SP21: Economic Development;
- SP22: Retention of employment sites;
- SP23: Sustainable transport;
- H1: Housing site allocations;
- OS1: Open space allocations;
- GT1: Gypsy and Traveller site allocations;
- EMP1: Employment site allocations;
- ID1: Infrastructure delivery; and
- The relevant strategic site allocations that are located in Headcorn Parish, namely H1(35), H1(36), H1(37), H1(38), H1(39), H1(40), GT1(5), GT1(6), and EMP1(1).

### **A2.iii Headcorn's Evidence Base**

**11.25** Development of the policies contained in Headcorn's Neighbourhood Plan has been informed by a significant body of evidence. Some of this evidence has been gathered specifically to support this Neighbourhood Plan, including surveys of residents and businesses;<sup>48</sup> and specially commissioned reports covering sustainability and the operation of Headcorn's sewerage system. Details of this evidence are provided below.

**11.26** In addition, the analysis supporting this Neighbourhood Plan makes use of a variety of data sources provided by the Office for National Statistics (ONS), including: the Census data for 2001, 2011 and 2021; the Business Register and Employment Survey; and the ONS mapping tool for rural-urban classifications. In most cases the data for Headcorn refer to Headcorn Parish, but where the data refer to either Headcorn Ward or Headcorn Village (i.e. the built-up area of Headcorn) that is made clear in the text. As well as national statistical sources, the analysis has also used the evidence collected by Maidstone Borough Council to inform its Local Plan.

---

<sup>48</sup> Headcorn's approach to surveys was used as a case study produced by Planning Aid to help other Neighbourhood Planning groups think about how to gather evidence. See: <http://www.ourneighbourhoodplanning.org.uk/case-studies/view/314>.



### **A2.iii.a 2021 Residents' survey**

**11.27** This was a survey of all residents of Headcorn Parish aged 14 and over, although non-residents could also respond. It was designed to assess to what extent the views of residents had changed since the survey conducted in 2013; to gauge support for potential policy options; and to assess potential demand for housing amongst emerging households in Headcorn. The 2021 Residents' Survey was issued to residents in February 2021 (with a response deadline of March 14<sup>th</sup> 2021). Unlike the previous 2013 Residents' Survey, it was conducted entirely online in order to manage COVID risks and did not benefit from volunteers knocking on doors to encourage people to respond. Instead all publicity was done online and by word of mouth. Despite this, there were 447 responses, representing over 10% of the eligible population and over 20% of households, a response rate of 56% of the previous survey.

**11.28** The questions included asking participants about: the vision for Headcorn; the appropriate size of individual developments; preferences on where to build; preferences for specific types of housing needed, including housing for gypsies and travellers; housing need from within the household and friends and family; views on local infrastructure; traffic issues; priorities for protecting the local environment; size and tenure of property occupied; demographic details; and length of time in the Parish.

**11.29** In general the responses provided strong support for the core policies in the previous draft Plan and aligned well with the results of earlier surveys. In particular, the Vision underpinning the previous draft Plan was overwhelmingly supported by those responding to the survey.<sup>49</sup> There was similarly very strong support for encouraging small scale development, with 77% of respondents wanting individual developments to be at most 25 houses.

### **A2.iii.b 2015 Residents' Survey**

**11.30** As part of the Regulation 14 Consultation on Headcorn's earlier draft Neighbourhood Plan, which closed on July 31, 2015, Headcorn Parish Council also took the opportunity to undertake a short survey of residents to gauge support for specific proposals within the draft Plan. One of the questions asked was whether they supported the Plan overall, to which 93.9% responded yes.

### **A2.iii.c 2013 Residents' Survey**

**11.31** This was a survey of all residents of Headcorn Parish aged 14 and over, with volunteers canvassing the dwellings in the Parish to talk to residents and to give fliers to all households to alert residents that the survey was being conducted. The Parish Council also used other means to alert eligible participants, such as notices on the village green and on the village website. Participants were given the option of responding on-line or on paper and asked questions in a variety of multiple choice and free text forms. The survey achieved 797 responses and it is estimated that these responses represent 612

---

<sup>49</sup> 82% of participants in the 2021 Headcorn Residents' Survey supported the draft Vision, with an additional 15% ticking maybe. In total only 3% of residents opposed the draft Vision for Headcorn.

households. Based on the data for the 2011 Census, the estimated response rate was over 28% of the eligible population and around 42% of households. Questions included asking participants about: their vision for Headcorn; what they value about living in the Parish; threats and opportunities of development; appropriate size of individual developments; support for overall development; preferences on where to build; preferences for specific types of housing needed, including housing for gypsies and travellers; housing need from within the household and friends and family; moving expectations; size and tenure of property occupied; views on local infrastructure; views on design and environmental issues; travel patterns; traffic issues; work patterns and local employment needs and preferences; demographic details; and length of time in the Parish.

#### ***A2.iii.d Headcorn Survey of Businesses, 2013.***

**11.32** This was a survey of owners and managers of businesses based in Headcorn Parish. Participants were given the option of responding on-line or on paper and asked questions in a variety of multiple choice and free text forms. The survey achieved 55 usable responses, which is a 38.5% response rate, based on the estimate of 143 businesses operating in the Parish at the time of the survey, who all received notification that the survey was taking place and how to participate. Questions included asking participants about: their views on Headcorn as a location to do business; constraints on future expansion; number of employees in the business; number of employees living in Headcorn; the location of the majority of their customers; commuting patterns of the respondent; type of business; sectors that should be encouraged as part of the Neighbourhood Plan; and what would encourage businesses to locate in Headcorn.

#### ***A2.iii.e Headcorn Estate Agents' Survey, 2013.***

**11.33** This was a survey of seven estate agents, who are the main estate agents selling and renting properties in the Parish. This survey was conducted face-to-face, based on a discussion guide. Participants were asked a series of questions to help explore the demand and supply conditions in Headcorn's property market.

#### ***A2.iii.f Traffic surveys.***

**11.34** Two traffic surveys were undertaken: one in 2013 and one in 2014 (to gather evidence of the impact on traffic movements of the relocation of the doctors' surgery to the outskirts of the village). The surveys were conducted mid-week, during school term time in both the morning and evening, as well as key points during the day. See Jefferys (2015) for full details.

#### ***A2.iii.g Survey of Headcorn Primary School, 2014.***

**11.35** A survey conducted by Headcorn Primary School of parents, pupils, teachers and governors to gather evidence on their preferences for the future development of the school and how to cope with the need for expansion.

### ***A2.iii.h Feedback sessions***

**11.36** As well as the formal surveys, residents and businesses were given opportunities to feedback informally during a series of meetings held during 2013 and 2014 and these responses have also informed Headcorn's evidence base, particularly the poster sessions held in June 2014, which allowed participants to use stickers to respond to a series of questions.

### ***A2.iii.i Position statements***

**11.37** As well as the surveys, Headcorn Parish Council also requested position statements from Headcorn Primary School and various clubs and societies in Headcorn (including the bowls club, cricket and tennis club, football club and badminton club), to help understand their needs. A position statement was also requested from the doctor's surgery, but this was not provided.

### ***A2.iii.j Analysing the overall sustainability of housing development in Headcorn***

**11.38** Headcorn Parish Council commissioned Analytically Driven Ltd to analyse how much housing development would be sustainable in Headcorn over the period 2011 to 2031. The assessment uses the definition of sustainability within the 2012 National Planning Policy Framework, which defined sustainability in economic, social and environmental terms. A key part of the analysis is assessing whether Headcorn is right location for housing to support growth and innovation (which is a crucial part of the NPPF's definition of economic sustainability). The results show that Headcorn is relatively far from key urban centres – the time, distance and cost of travel to the nearest urban centres will act as a significant barrier to those hoping to enter the labour market, for example, as well as important services such as hospital care. Not only will the distances involved make it harder for households to effectively engage in these labour markets, unless there are local jobs available in the Parish locating in Headcorn would result in commuting patterns that are significantly above average in terms of time, distance and cost. This makes Headcorn a less desirable location relative to other, better connected, options, particularly for workers on low incomes, as the cost of commuting would account for a significant proportion of their income, potentially leading them to be excluded from the labour market. See Driver (2014).

### ***A2.iii.k Sustainability appraisal of possible strategic development sites in Headcorn***

**11.39** Headcorn Parish Council also commissioned the internationally-renowned consultants Levett-Therivel to undertake an assessment of the sustainability of potential strategic development sites in Headcorn village. See Therivel (2015). The site assessment exercise undertook a sustainability appraisal of 20 potential strategic housing development locations in Headcorn Parish. These sites represent the sites submitted to Maidstone Borough Council as potential sites for housing development in the Strategic Housing Land Availability Assessment consultations that Maidstone Borough Council undertook between

2012 and 2014. Sites south of the railway station were not considered because they are prone to flooding, are near the River Sherway / River Beult Site of Special Scientific Interest (SSSI), and are difficult to access.

### **A2.iii.1 Headcorn foul drainage assessment**

**11.40** The results from the 2013 Residents' Survey and the Survey of Businesses in Headcorn Parish, as well as observed overflow at the manhole in Moat Road and the results of the Water Cycle Study by Halcrow Group Limited (2010) for Maidstone Borough Council all highlighted significant problems with the sewerage system in Headcorn.

**11.41** To identify how prevalent the problems were, where the problems were located and what impact any identified problems might have on the feasibility of further housing development in Headcorn, Headcorn Parish Council commissioned Sanderson (Consulting Engineers) Ltd to undertake an assessment of the sewerage system in Headcorn village. This followed explicit advice from the Head of Planning at Maidstone Borough Council that in order to be considered as a constraint, more specific information on the relevant issues was needed.

**11.42** The study was a modelling exercise based on information provided by Southern Water, which is the company responsible for sewerage in Headcorn. Results from the study identified that the current system has significant problems, including:

- 15 sewage pipes that already have insufficient capacity, including 9 locations, totalling some 432m linear run, on the main distribution network;
- 14 sewage pipes that suffer from back-fall (where sewage is trying to flow uphill);
- 74 sewage pipes (around 60% of the sewerage network in the village) where the pipes are not self-cleaning due to inadequate velocity; and
- 6 sections of sewage pipes that suffer from all three problems.

**11.43** These problems are in evidence throughout the village and include several sections of major pipework that are important for the functioning of the entire sewerage system in the village – in other words, problems are not simply confined to small, localised areas. The results also highlighted that Southern Water's records are far from complete, with at least some data missing for 45% of the manholes in the village, suggesting further problems might emerge when more accurate records are available. For example, the problem section of sewerage in Moat Road could not be modelled, because Southern Water's records suggested that sewage flowed in both directions, something that is unheard of in engineering terms. See Sanderson (Consulting Engineers) Ltd (2015) for full results.

## APPENDIX 3: REFERENCES

- Burgess, S, Briggs, A, McConnell, B and Slater, H (2006) "School choice in England: background facts", Centre for Market and Public Organisation, Working Paper No 06/159.
- Department for Communities and Local Government (2015) "Planning Policy for traveller sites", August 2015 (version issued by DLUHC in December 2023), [https://assets.publishing.service.gov.uk/media/658198bb23b70a000d234c03/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/media/658198bb23b70a000d234c03/Final_planning_and_travellers_policy.pdf).
- Department for Levelling Up, Housing and Communities (2023) "National Planning Policy Framework", December 2023, [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf).
- Driver, R (2014) "Analysing the sustainability of housing development in Headcorn: How much development would be sustainable?", Analytically Driven Ltd, [http://www.analytically-driven.com/uploads/2/7/8/1/27818525/sustainability\\_of\\_housing\\_development\\_in\\_headcorn\\_-\\_background\\_report\\_to\\_support\\_the\\_neighbourhood\\_plan\\_-\\_final\\_draft\\_-\\_december\\_2014.pdf](http://www.analytically-driven.com/uploads/2/7/8/1/27818525/sustainability_of_housing_development_in_headcorn_-_background_report_to_support_the_neighbourhood_plan_-_final_draft_-_december_2014.pdf).
- Halcrow Group Limited (2010) "Water Cycle Study", Maidstone Borough Council.
- JBA Consulting (2020) "Maidstone Borough Council Level 1 SFRA update and Level 2 SFRA: Final report", [https://localplan.maidstone.gov.uk/\\_data/assets/pdf\\_file/0004/372586/7-SFRA-Level-1-update-and-Level-2.pdf](https://localplan.maidstone.gov.uk/_data/assets/pdf_file/0004/372586/7-SFRA-Level-1-update-and-Level-2.pdf).
- Kent County Council (2020) "Kent Minerals and Waste Local Plan (KMWLP)", <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/housing,-regeneration-and-planning-policies/planning-policies/minerals-and-waste-planning-policy/kent-minerals-and-waste-local-plan-kmwlp>.
- Kent County Council (2018) "Rights of Way Improvement Plan", [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).
- Maidstone Borough Council (2021) "Headcorn Conservation Area: Conservation Area Appraisal and Management Plan", Draft October 2021.
- Maidstone Borough Council (2017) "Maidstone Borough Local Plan: Adopted 25 October 2017", [https://maidstone.gov.uk/\\_data/assets/pdf\\_file/0005/171149/Local-Plan-v2-November-2017.pdf](https://maidstone.gov.uk/_data/assets/pdf_file/0005/171149/Local-Plan-v2-November-2017.pdf).
- Maidstone Borough Council (2013) "Consultation draft: Maidstone Borough Council Green and Blue Infrastructure Strategy", [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0013/42421/Draft-Green-and-Blue-Infrastructure-Strategy-December-2013.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0013/42421/Draft-Green-and-Blue-Infrastructure-Strategy-December-2013.pdf)
- Manning, Alan, and Barbara Petrongolo. 2017. "How Local Are Labor Markets? Evidence from a Spatial Job Search Model." *American Economic Review*, 107 (10): 2877-2907.

Therivel, R. (2015) "Sustainability appraisal of possible strategic development sites in Headcorn", Levett-Therivel, Headcorn Parish Council, (<http://www.headcornpc.kentparishes.gov.uk>).

Sanderson (Consulting Engineers) Ltd (2015) "Headcorn foul drainage assessment", Sanderson Associates (Consulting Engineers) Ltd.

**Copyright:** © Headcorn Parish Council, 2024

**For more information contact:**

Headcorn Parish Council,  
Parish Office,  
Headcorn Village Hall,  
Church Lane,  
Headcorn,  
TN27 9NR  
Phone:01622 892496  
Email: [clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)  
<https://headcornpc.org/>

# HEADCORN MATTERS

## CONSULTATION STATEMENT FOR HEADCORN PARISH NEIGHBOURHOOD PLAN: 2022-2038



**ISSUED BY: HEADCORN PARISH COUNCIL AS  
REQUIRED UNDER SECTION 15 OF THE  
NEIGHBOURHOOD PLANNING (GENERAL)  
REGULATIONS 2012**

Submission date: March 2024



## CONTENTS

<b>1.</b>	<b>Introduction</b>	<b>5</b>
<b>2.</b>	<b>Regulation 14 Consultation in 2023</b>	<b>6</b>
2.i	Consideration of general comments on Headcorn's Neighbourhood Plan	6
2.ii	Consideration of comments on HNP1: Design and the Design Guidance	8
2.iii	Consideration of comments on HNP2: Siting, landscaping and protecting the natural and historic environment and setting	10
2.iv	Consideration of comments on HNP3: Connectivity and access	13
2.v	Consideration of comments on HNP4: Infrastructure provision	15
2.vi	Consideration of comments on HNP5: Dwellings	18
2.vii	Consideration of comments on HNP6: The economy	21
2.viii	Consideration of comments on the decision to apply the same rules to all parts of the community	22
<b>3.</b>	<b>Consultations with Maidstone Borough Council</b>	<b>24</b>
3.i	Consultations on Headcorn's Neighbourhood Plan run by Maidstone Borough Council	24
<b>4.</b>	<b>Residents' Survey in 2021</b>	<b>26</b>
4.i	Preferences for development in the 2021 Residents' Survey	26
4.ii	Evidence on Housing Needs	28
4.iii	Evidence on infrastructure	29
<b>5.</b>	<b>Previous Consultations and Other Evidence</b>	<b>31</b>
5.i	2015 Residents' Survey	31
5.ii	2013 Residents' Survey	31
5.iii	Headcorn Survey of Businesses, 2013.	31
5.iv	Headcorn Estate Agents' Survey, 2013.	32
5.v	Traffic surveys.	32
5.vi	Survey of Headcorn Primary School, 2014.	32
5.vii	Feedback sessions	32
5.viii	Position statements	32
5.ix	Analysing the overall sustainability of housing development in Headcorn	33
5.x	Sustainability appraisal of possible strategic development sites in Headcorn	33
5.xi	Headcorn foul drainage assessment	33
5.xii	Other sources of evidence	34
	<b>Appendix 1: 2023 Regulation 14 Consultation Process</b>	<b>35</b>
A1.i	Online 2023 Regulation 14 Questionnaire	36
A1.ii	Organisations consulted	46

A1.iii	Examples of the Regulation 14 publicity	48
<b>Appendix 2: Detailed 2023 Regulation 14 Responses</b>		<b>53</b>
A2.i	2023 Regulation 14 Consultation Online Survey multiple choice responses	53
A2.ii	Comments from the 2023 Regulation 14 Consultation Online Survey on Headcorn’s Neighbourhood Plan	54
A2.ii.a	Comments on: Headcorn Neighbourhood Plan as a whole	54
A2.ii.b	Comments on: HNP1 Design and Design Guidance	58
A2.ii.c	Comments on: HNP2 Siting, landscaping and protecting the natural and historic environment and setting	60
A2.ii.d	Comments on: HNP3 Connectivity and access	62
A2.ii.e	Comments on: HNP4 Infrastructure	63
A2.ii.f	Comments on: HNP5 New dwellings (and same policies applying to everyone)	66
A2.ii.g	Comments on: HNP6 The Economy	68
A2.iii	Responses from those not using the 2023 Regulation 14 Survey	69
A2.iii.a	Response from Maidstone Borough Council	70
A2.iii.b	Response from Kent County Council	76
A2.iii.c	Response from Historic England	84
A2.iii.d	Response from National Highways	86
A2.iii.e	Response from Loose Parish Council	87
A2.iii.f	Response from National Gas Transmission	88
A2.iii.g	Response from National Grid Electricity Transmission	90
A2.iii.h	Response from Catesby Estates	92
<b>Appendix 3: Residents’ Survey 2021 Questionnaire</b>		<b>95</b>
<b>Appendix 4: The Making of Headcorn’s Neighbourhood Plan</b>		<b>111</b>
A4.i	Background to Headcorn’s Neighbourhood Plan	111
<b>Appendix 5: References</b>		<b>114</b>

## LIST OF FIGURES

Figure 1: Support for the Headcorn Neighbourhood Plan and key policies, Regulation 14 Consultation results.....	6
Figure 2: Maidstone Borough Council’s Local Plan approach to sequential flood risk assessment..	11
Figure 3: Preferences for the size of developments in 2021 and 2013.....	27
Figure 4: Preferences on the location of development in the 2021 Survey .....	27
Figure 5: Priorities for housing in the 2021 Survey .....	28

Figure 6: Preferred tenure for existing residents in emerging households in Headcorn, 2021 Residents’ Survey .....	28
Figure 7: Preferred size of property amongst emerging households in Headcorn, 2021 Residents’ Survey.....	29
Figure 8: Infrastructure needs, 2021 Residents’ Survey .....	29
Figure 9: Preferences for traffic management options, relative support, 2021 Residents’ Survey .	30
Figure 10: Preferences for managing the physical environment, relative support, 2021 Residents’ Survey.....	30
Figure 11: Extracts of the main Headcorn Neighbourhood Plan website page – the Regulation 14 launch .....	48
Figure 12: Notices placed on parish and library noticeboards on June 22 <sup>nd</sup> 2023 .....	49
Figure 13: Facebook and Instagram posts on June 22 <sup>nd</sup> 2023 .....	50
Figure 14: Facebook Cover photo, launched June 27 <sup>th</sup> 2023 .....	51
Figure 15: Headcorn Village newsletter July 1 <sup>st</sup> 2023 .....	51
Figure 16: Headcorn Village newsletter August 1 <sup>st</sup> 2023, with photo of Days Green banner .....	52

## **LIST OF TABLES**

Table 1: Responses to multiple choice questions, 2023 Regulation 14 Consultation .....	53
--	----

## **1. INTRODUCTION**

**1.1** The Headcorn Neighbourhood Plan will provide the planning framework for Headcorn Parish over the period 2022 to 2038. The draft Headcorn Neighbourhood Plan has been issued by Headcorn Parish Council, the qualifying body under the Regulations.

**1.2** Following a consultation carried out between 22<sup>nd</sup> June 2023 and 14<sup>th</sup> August 2023 under Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 (the "Regulations"), Headcorn Parish Council is now submitting a plan proposal to the Local Planning Authority, Maidstone Borough Council (MBC). Part of the submission that HPC is required to make is a statement under Section 15 (2) of the Regulations that:

- Contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- Explains how they were consulted;
- Summarises the main issues and concerns raised by the persons consulted; and
- Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

**1.3** This Consultation Statement fulfils that requirement.

**1.4** Section 2 of this Consultation Statement covers how the responses from the 2023 Regulation 14 Consultation on Headcorn's Neighbourhood Plan have been considered and the resulting changes to the Plan. The details of the Regulation 14 Consultation process itself are set out in Appendix A1 and Appendix A2 contains the detailed responses to the Regulation 14 consultation on Headcorn's Neighbourhood Plan.

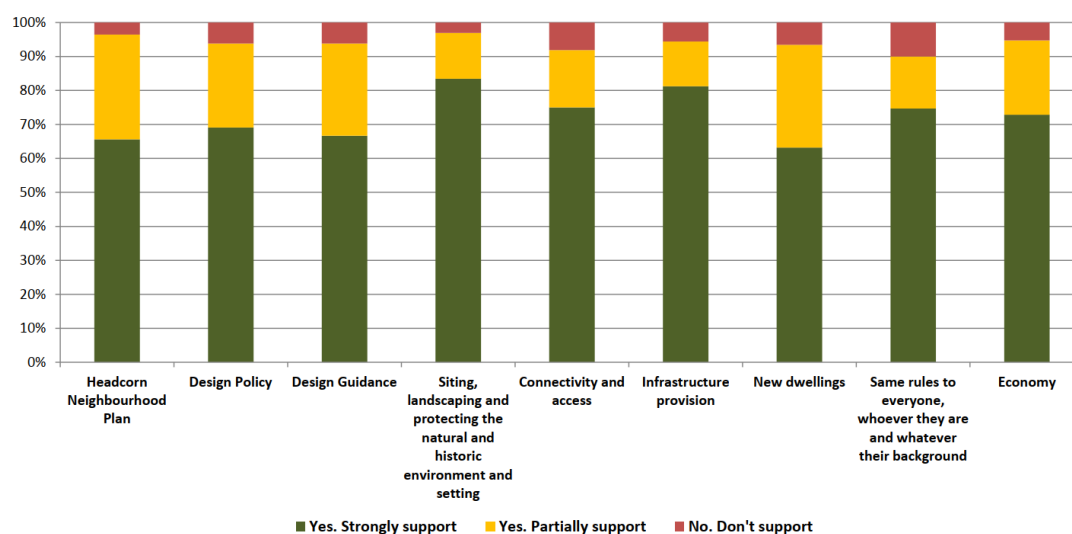
**1.5** However, the 2023 Regulation 14 Consultation on Headcorn's Neighbourhood Plan is not the only consultation or evidence gathering that Headcorn Parish Council has undertaken to support the development of its Neighbourhood Plan. Therefore, for completeness: Section 3 provides some additional details on consultations with and by Maidstone Borough Council; Section 4 provides some high level results for the 2021 Residents' Survey; and Section 5 covers previous surveys and evidence gathering.

## 2. REGULATION 14 CONSULTATION IN 2023

**2.1** Headcorn Parish Council undertook its Regulation 14 Consultation on the Headcorn Neighbourhood Plan between June 22<sup>nd</sup> and August 14<sup>th</sup> 2023. In total it received 262 responses, including 14 from organisations. Headcorn Parish Council is very grateful to everyone who took the time to respond to its Regulation 14 Consultation and has carefully considered all the comments. This Section covers how the responses from the 2023 Regulation 14 Consultation on Headcorn’s Neighbourhood Plan have been considered and the resulting changes to the Plan. The details of the Regulation 14 Consultation process itself are set out in Appendix A1 and Appendix A2 contains the detailed responses to the Regulation 14 consultation on Headcorn’s Neighbourhood Plan.

**2.2** The vast majority of responses (254) to the Regulation 14 Consultation were through an online survey that Headcorn Parish Council provided. This was structured to allow Headcorn Parish Council to gauge support for its Neighbourhood Plan and individual policies, while still allowing respondents to provide separate comments. As can be seen from Figure 1, there was very strong overall support for the Neighbourhood Plan and its policies amongst respondents.

**Figure 1: Support for the Headcorn Neighbourhood Plan and key policies, Regulation 14 Consultation results**



www.analytically-driven.com

**2.3** The remainder of this section covers Headcorn Parish Council’s response to the detailed comments provided through its Regulation 14 Consultation.

### 2.i Consideration of general comments on Headcorn’s Neighbourhood Plan

**2.4** In general the comments provided via the online survey on Headcorn’s Neighbourhood Plan as a whole were broadly positive. However, similar concerns were raised by those supporting and opposing the Plan, indicating that certain issues concerned all parts of the community. Headcorn Parish Council has considered all the responses carefully.

**2.5** The period covered by Headcorn's Neighbourhood Plan runs from 2022 to 2038. The end point of Headcorn's Neighbourhood Plan therefore matches Maidstone's emerging Local Plan, which was submitted for examination in March 2022. Headcorn Parish Council notes that the start of Maidstone's revised Local Plan is 2021. It considered Maidstone Borough Council's suggestion to backdate the start of the Neighbourhood Plan to coincide with this, but felt that this was unnecessary as the Plan will have no ability to influence historic decisions.

**2.6** Both Maidstone Borough Council and another respondent raised the fact that the list of Basic Conditions set out in paragraph 1.9 of the Plan was incomplete. This was a deliberate choice, as the aim was to highlight those conditions that will be used specifically to judge the policies in Headcorn's Neighbourhood Plan, rather than to list all the conditions set out in regulation, including the ones that did not apply. However, a footnote has been added to paragraph 1.9 of the Neighbourhood Plan to make this clear.

**2.7** Kent County Council commented that there are three safeguarded land-won minerals in Headcorn Parish that were not included in the Neighbourhood Plan, and recommended that the draft Neighbourhood Plan includes an understanding of these minerals and the relevant Development Plan policies. However, there is a legislative requirement that Neighbourhood Plans must not include policies that cover excluded development, such as county matters (mineral extraction and waste development). Headcorn Parish Council therefore considered that in order to meet the prescribed conditions, it would not be possible to add a reference to mineral safeguarding to the relevant policy and policy justification on the siting of developments (**HNP2**). Recognising the importance of ensuring that safeguarded minerals are appropriately protected, Headcorn Parish Council did, however, add a reference to mineral safeguarding to Section 2.i. of the Neighbourhood Plan, with a reminder that these matters are dealt with through the Kent Minerals and Waste Local Plan (KMWLP), as well as including KMWLP in the list of abbreviations and definitions found in Appendix A1 of Headcorn Neighbourhood Plan.

**2.8** In line with Kent County Council's suggestion, Headcorn Parish Council has added the definition of a public right of way (PRoW) to Appendix A1 of Headcorn Neighbourhood Plan. Headcorn Parish Council has also added a discussion of PRoW to Section 7 covering connectivity and access. However, Headcorn Parish Council has not added a reference to PRoW to paragraph 2.1 of the Plan. Paragraph 2.1 deals with the relative distance of Headcorn from major population and employment centres and is therefore is not the right place to discuss PRoW. Similarly, Headcorn Parish Council has not added an explicit reference of PRoW into the Vision for the Plan, set out in Section 3. This Vision was tested with residents as part of the 2021 Residents' Survey, with 83% of residents fully supporting the Vision and only 3% opposing it. Headcorn Parish Council felt it would be inappropriate to change the Vision without further consultation, and felt that this was not warranted given the strength of local support for the Vision.

**2.9** Headcorn Parish Council was pleased to see that Historic England welcomed the approach taken in Headcorn's Neighbourhood Plan, which ensured that the historic environment would be a significant factor in any decisions.

**2.10** Headcorn Parish Council is also grateful to Kent County Council for bringing to its attention additional evidence of Headcorn's archaeological and built environment. A reference to the archaeological heritage found in Headcorn Parish has been added to Section 2.ii on the history of the Parish. A reference to the five moated sites and 70 historic farmsteads has also been added to Section 2.ii.a. This reflects the importance that Headcorn Parish Council attaches to Headcorn's history and heritage assets and the fact that it considers that these should inform development choices. For this reason Headcorn Parish Council has not followed Maidstone Borough Council's suggestion of deleting paragraph 2.10.

**2.11** Headcorn Parish Council also considered Maidstone Borough Council's question about whether breakdown from the residents' survey results are needed. Headcorn Parish Council considers that the survey evidence is important, because it has helped inform decisions within the Plan and is a key component of its policy justification. Headcorn Parish Council has therefore retained this evidence.

**2.12** Headcorn Parish Council notes the comment by one respondent in relation to the evidence base used. Headcorn Parish Council considers that it has produced significant volume of evidence, and that this evidence has informed the development of Plan policies. Furthermore: where evidence has been used, the relevant evidence has always been quoted within the policy justification to make clear how evidence has shaped the Neighbourhood Plan; Appendix A2.iii of the Plan lists the main sources of evidence gathered specifically to support the Plan itself; and Appendix A3 provides a list of references, including references to other sources of research and evidence (including evidence used in developing Maidstone's Local Plan) that have been used. Headcorn Parish Council does not feel that additional evidence is needed to support its policy positions. However, for completeness this Consultation Statement provides a summary of the high level results from the 2021 Residents Survey, as well as a description of the other evidence that has been gathered to support Headcorn's Neighbourhood Plan. In some places, for example in relation to affordable housing and housing for emerging households, Headcorn Parish Council has also added additional summaries of the evidence used to the policy justifications.

## **2.ii Consideration of comments on HNP1: Design and the Design Guidance**

**2.13** The Design policy for Headcorn (HNP1) is supported by Design Guidance and sets the overall framework governing the look and feel of developments in Headcorn, and rules to ensure that new developments will be good neighbours. Overall the comments provided through the online survey on the Design Policy and Design Guidance raised overarching points, often supporting the approach taken, rather than specific issues that needed to be addressed.

**2.14** However, one comment raised the fact that it should be "railway station" rather than "train station" and this has been addressed. The respondent also raised concerns about the use of Forge Meadows as an example, because of vehicles parking on pavements. Headcorn Parish Council recognises the concerns about parking and has tried to shape Neighbourhood Plan policies to reduce (or at least not exacerbate) existing problems. In

this particular case, however, Forge Meadows is being used as an example for how siting parking spaces within a greenspace, and retaining old trees, rather than having all the parking in front of the properties, can help soften the parking scheme. It considers that this remains valid and has therefore retained it as an example. The use of kilometres, rather than miles, has been retained, because it allows direct comparisons to be made to research and data cited in the Neighbourhood Plan.

**2.15** Another respondent raised the fact that the design policy does not consider recreational facilities, which are important for mental health and wellbeing reasons. Headcorn Parish Council notes that the provision of recreational spaces is covered in HNP5 Part II.3 as part of the policy on major developments (of ten or more dwellings), as well as HNP4 Part E on infrastructure provision and HNP2 on siting and landscaping.

**2.16** In relation to Maidstone Borough Council's comments on Headcorn's Neighbourhood Plan, the drafting comments have all been addressed. On the comment on conformity with Maidstone Borough Plan policy DM8, Headcorn Parish Council notes that this is not a strategic policy, and therefore there is no requirement for Headcorn's Neighbourhood Plan to be in general conformity with it. However, it has added the sentence "*Therefore proposals on external lighting need to demonstrate that proposed lighting is necessary*" to paragraph 5.61.

**2.17** On the point about conformity to Maidstone Local Plan Policy DM4 criteria 1, on enhancement of a heritage asset, Headcorn Parish Council notes that DM4 is not a strategic policy. There is therefore no requirement for Headcorn's Neighbourhood Plan to conform with Policy DM4. Headcorn Parish Council does not consider that Policy HNP1 as drafted would preclude the enhancement of a heritage asset and notes that Policy HNP1.B is focused on the setting of heritage assets, rather than the assets themselves. It has therefore decided not to amend policy HNP1 to deal with the issue of enhancing heritage assets.

**2.18** On the point Maidstone Borough Council raised about whether the Design Guidance should come before the Design Policy (HNP1), Headcorn Parish Council has retained the Design Guidance in its current position within the Neighbourhood Plan. This is because the Design Guidance is not a policy justification. Instead it provides guidance about how the Design Policy should be implemented. Therefore Headcorn Parish Council considers that it is more logical for the Design Guidance to follow the Design Policy, rather than to precede it.

**2.19** In relation to Kent County Council's comments on policy HNP1 Design and the associated Design Guidance, Headcorn Parish Council notes that the Kent Design Guide (2005) is not part of the Development Plan for the local area. Therefore, even if the Kent Design Guide (2005) was deemed to be a strategic policy, there would be no requirement under the Basic Conditions for the Headcorn Neighbourhood Plan to be in general conformity with this policy. Headcorn Parish Council considered the Kent Design Guide (2005) when developing its policy options. However, it notes that this policy covers the whole of Kent, and has not been designed specifically for rural areas such as Headcorn. In developing its own design policy and guidance Headcorn Parish Council focused on how to



maintain and enhance Headcorn's sense of place, by drawing on examples from existing public highways in Headcorn. Headcorn Parish Council considers that its existing approach remains broadly appropriate. However, Headcorn Parish Council has added a reference to "how the parking layout is able to accommodate the needs of cyclists, motorcyclists and the mobility impaired" to paragraph 5.89 on parking.

### **2.iii Consideration of comments on HNP2: Siting, landscaping and protecting the natural and historic environment and setting**

**2.20** HNP2 is the policy on siting, landscaping and protecting the natural and historic environment and setting, which sets the rules to determine how developments sit within the landscape. Overall the comments provided through the online survey raised overarching points, often supporting the approach taken, rather than specific issues that needed to be addressed. It was particularly notable that several respondents raised the issue of flooding in Headcorn, reinforcing the rationale for the policy approaches proposed. One respondent noted the potential to use initiatives such as the provision of swift boxes, large ponds, hedgehog holes and bat boxes to encourage wildlife. Headcorn Parish Council considers that the text of HNP2 makes clear that supporting wildlife is an important consideration for developers. However, it considered that the specific examples might help provide ideas for developers. It has therefore added a supporting paragraph to the justification for Policy HNP2 setting out that:

*"In considering how to support local wildlife, developers should also look at design options that might help wildlife such as swift boxes, hedgehog holes and bat boxes. Developers should also consider whether a more ambitious approach would be more effective in some circumstances. For example, a larger pond might support more wildlife than smaller options. In general developers are encouraged to take an ambitious approach to encouraging and supporting local wildlife."*

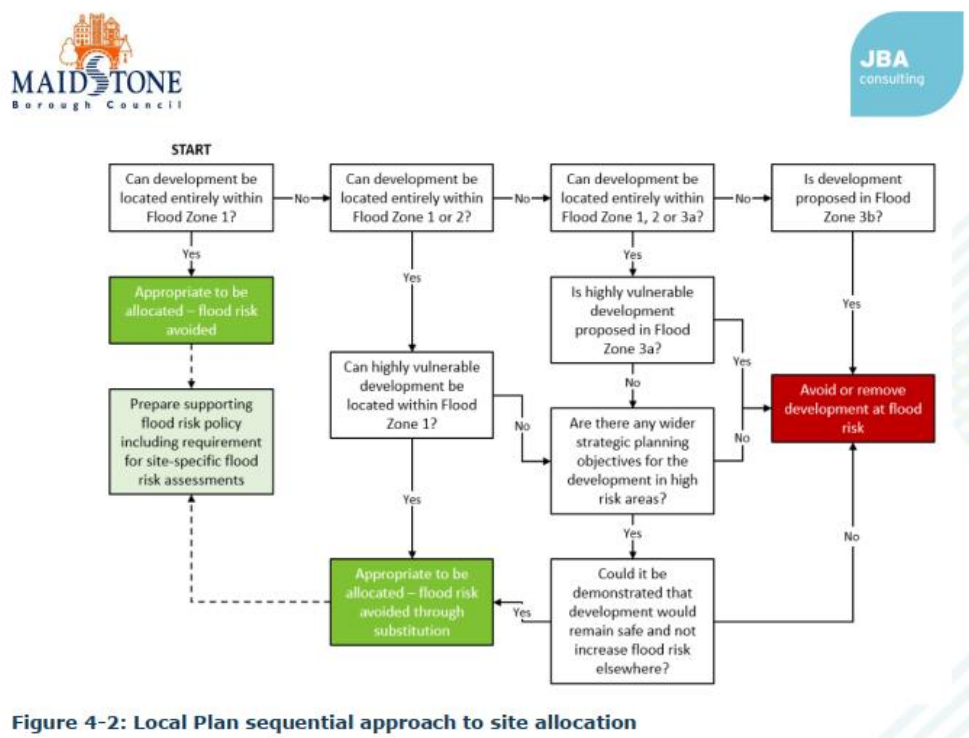
**2.21** Headcorn Parish Council notes that some respondents felt that wildlife areas were messy, or full of stinging nettles. The choice of plants (beyond native plants) has not been mandated under the Plan, but nettles are an important food source for several insect species and not tidying up can help wildlife over winter. On balance therefore, given the importance many respondents place on wildlife, Headcorn Parish Council considered that the proposed policy approach, which supports initiatives such as wildlife corridors, is correct.

**2.22** Headcorn Parish Council has taken on board the drafting suggestions for the HNP2 policy justification provided by Maidstone Borough Council. In relation to paragraph 6.41 (now 6.42), Headcorn Parish Council notes that paragraph 84 of the 2023 National Planning Policy Framework (NPPF) states that "Planning policies and decisions should avoid the development of isolated homes in the countryside". Headcorn Parish Council considers that this requirement relates to homes outside the settlement boundaries (unless they abut the boundary). However, it has added "except under strict conditions" to paragraph 6.42 to make it clear that development in the countryside is allowed under some circumstances.

**2.23** Headcorn Parish Council is pleased that Kent County Council, as Lead Local Flood Authority, supports its approach to flood risk and Sustainable Urban Drainage Systems (SuDS).

**2.24** In relation to Maidstone Borough Council’s comments on part 11 of Policy HNP2, Headcorn Parish Council considers that its treatment of flood risk remains appropriate, particularly given the observed poor performance of SuDS systems in Headcorn and the high risk of flooding, including surface water flooding, in Headcorn. Headcorn Parish Council notes that paragraph 165 of the NPPF states that “*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at the highest risk (whether existing or future).*” It considers that part 11 of Policy HNP2 achieves this. Headcorn Parish Council notes that its proposals are also in line with Maidstone Borough Council’s own Strategic Flood Risk Assessment (SFRA) underpinning the Maidstone Borough Local Plan (see Figure 2). Headcorn Parish Council has therefore retained the current wording of part 11 of Policy HNP2 on flood risk.

**Figure 2: Maidstone Borough Council’s Local Plan approach to sequential flood risk assessment.**



**Figure 4-2: Local Plan sequential approach to site allocation**

**Source:** Maidstone Borough Council Level 1 SFRA update and Level 2 SFRA.

**2.25** In relation to the need to be more specific about the areas where Headcorn Parish Council is aware of recent flood events, Headcorn Parish Council considers that it is more effective to keep the policy as drafted. The nature of flood risk is that it will change in response to changes elsewhere. For example, poorly chosen urban drainage solutions may cause flooding on land that has not previously flooded. This makes local knowledge and the ability to respond to new circumstances important. Therefore Headcorn Parish Council

considers that the existing policy approach is the most appropriate, as it allows the Parish Council to respond to changing circumstances. The Parish Council will always be willing to talk to developers about known flood risks that might impact proposed developments.

**2.26** In relation to Maidstone Borough Council's comments on part 3 of Policy HNP2, Headcorn Parish Council does not consider that the open spaces allocations OS10 and OS11 need to be specifically included in the policy wording. As drafted the policy covers all public green spaces and recreational spaces, including spaces within existing developments. There is nothing within the policy that would prevent a decision maker from protecting open space allocations within Maidstone's Local Plan. However, Headcorn Parish Council has added "*This includes protecting any Open Space allocations within Maidstone Borough Council's Local Plan*" to paragraph 6.15 of the policy justification for HNP2 to make this clear.

**2.27** Headcorn Parish Council notes that with respect to national policy, the Basic Conditions for a Neighbourhood Plan require it to have regard for national policy, rather than to conform to national policy. In relation to NPPF paragraph 103 (previously NPPF paragraph 99), Headcorn Parish Council considers that policy HNP2 clearly has regard for national policy. As with NPPF paragraph 103, Policy HNP2 part 3 starts from the presumption that open spaces, sports and recreational spaces should not be built on, and sets conditions for the circumstances in which development would be allowed, including replacement by equivalent or better provision.

**2.28** Headcorn Parish Council considered listing key views within Policy HNP2 part 2, as proposed by Maidstone Borough Council, but decided that referring to HNP Policy Map 12 was more effective and less open to misinterpretation from a drafting perspective. In relation to Kent County Council's suggestion that views from PRoW require protection, Headcorn Parish Council agrees that views from PRoW should also be considered, when considering views to protect. Headcorn Parish Council notes that most of the highlighted views to the South of the railway line in HNP Policy Map 12 relate to PRoWs. As such, it considers that it has met with Kent County Council's request.

**2.29** The respondent on behalf of Catesby suggested that Policy Map 12 on Key Views would need to be adjusted to take account of the development of the Land to the North of Moat Road. Headcorn Parish Council has considered this suggestion, but feels that it fails to understand the relationship between policy and development. Headcorn Parish Council considers that it will be the responsibility of the developer to design and landscape the proposed development on the Land North of Moat Road (should it be given permission) in a way that would ensure it did not have a detrimental impact on the identified views in HNP Policy Map 12. Headcorn Parish Council notes that Moat Road approach view was also seen as an important view that should be protected in Maidstone Borough Council's "*Headcorn Conservation Area: Conservation Area Appraisal and Management Plan*". Headcorn Parish Council has therefore kept HNP Policy Map 12 unchanged.

**2.30** In relation to Kent County Council's request to promote good public transport links to open spaces provided in the village to avoid car use, Headcorn Parish Council notes that the only bus service serving the village uses the A274. Requiring open spaces to be

accessed by the A274 (to promote accessibility by public transport) would reduce the likelihood that these spaces would benefit the intended recipients. It has therefore not acted on this suggestion, which it considers would be more helpful in an urban, rather than a village setting. However, it notes that Neighbourhood Plan policies aim to promote good connectivity, including by foot and cycle, which should help ensure open space provisions are easily accessible. In addition, where the proposal is to move a recreation space there is a requirement in policy HNP2 for accessibility to be at least as good.

**2.31** In relation to Kent County Council's request to add a sentence covering PRow into Section 6, Headcorn Parish Council considers that PRows are best dealt with under the policy justification for Section 7. Headcorn Parish Council has therefore added additional wording to paragraph 7.4 about the need to ensure that development does not adversely impact the PRow network, including the enjoyment residents gain from its use, and the need for avoiding harm to inform landscaping considerations.

**2.32** In relation to Kent County Council's comments on Section 6.v covering development in the countryside, Headcorn Parish Council notes that Headcorn Parish is not covered by the 13 Landscape Character Assessments set out in the Kent Downs AONB Farmstead Guidance. However, Headcorn Parish Council considers that many of the characteristics featured in that guidance, including the prevalence of clusters of buildings, with significant gaps in between, have informed the thinking underpinning Headcorn's Neighbourhood Plan.

**2.33** In relation to Kent County Council's points on biodiversity net gain, Headcorn Parish Council has added the need for this to be informed by ecological surveys to the policy justification. While Headcorn Parish Council recognises the strategic arguments in relation to offsite provision of biodiversity net gain, it considers that it remains appropriate for offsite biodiversity net gain to be achieved within the Parish. Headcorn Parish Council wants to ensure that this benefits local residents, both to help ensure development is seen to bring benefits to the Parish and to avoid degrading the local landscape. Headcorn Parish contains the River Beult Site of Special Scientific Interest. It is also home to several endangered species of bird, and provides summer nesting sites for species such as turtle doves and nightingales, and overwintering sites for species such as redwings and fieldfare. Therefore Headcorn Parish Council considers that there will be ample opportunities to look to support biodiversity net gain by managing habitats in Headcorn in ways that will help enhance the area around the SSSI to protect it more effectively and to support key species.

## **2.iv Consideration of comments on HNP3: Connectivity and access**

**2.34** Policy HNP3 covers connectivity and access and is designed to ensure that developments are safe and well-connected, and recognise particular constraints in Headcorn. Overall the comments provided through the online survey raised overarching points, often supporting the approach taken or raising concerns that support the rationale for the policy, rather than additional issues that needed to be addressed.

**2.35** Specific comments from the online survey covered: evidence that concerns about rat runs are valid, based on the experience of Artisan Road; the need to ensure safe routes to

allow people to walk to the shops; support for new public rights of way to create more access to the countryside; a preference for vehicle speed in the village to be set to 20mph; and a comment about the impact of traffic lights on the A274 on traffic volumes on Forge Lane and Oak Lane. Headcorn Parish Council has considered all these comments and considers that its approach remains broadly the right one.

**2.36** Headcorn Parish Council has taken on board the drafting suggestions for the HNP3 policy justification provided by Maidstone Borough Council.

**2.37** In relation to Kent County Council's comments on Public Rights of Way (PRoW), Headcorn Parish Council considers that Policy HNP3 part 1, which looks to "*creates safe and well connected developments, promoting and enhancing links both to Headcorn High Street and to the countryside that can be easily accessed by foot and cycle*" is fully aligned to Kent County Council's aims. Headcorn Parish Council did not feel that adding explicit mention of PRoW into HNP3 was needed, and was concerned it would make the drafting of the policy more complex, because of the need to then separately refer to the highways network, as well as PRoW. However, Headcorn Parish Council has added an explicit mention of the importance of protecting and enhancing PRoW to the policy justification for HNP3, together with an explicit reference of Kent County Council's ROWIP initiative.

**2.38** While there is no map of PRoW for the Parish as a whole within Headcorn's Neighbourhood Plan, HNP Policy Map 16 does cover the footpaths (PRoW) in and around the village itself. These are shown in yellow.

**2.39** In relation to Kent County Council's comments on the potential conflict between HNP3 Parts 1 and 5, Headcorn Parish Council considers that its existing approach remains valid. It is primarily looking to promote good connectivity between new developments and the High Street and the countryside. This might include creating new footpaths between developments, if this would help. However, large estates do not accord with Headcorn's sense of place and Headcorn Parish Council considers that these should not be created by stealth. Allowing vehicle access from one development to another would risk doing this. Headcorn Parish Council has added clarification to paragraph 7.6 that the need for self-contained developments would not preclude connections by either footpaths or cycle paths.

**2.40** In relation to Kent County Council's comment about the need to achieve direct and convenient access to public transport services, Headcorn Parish Council notes that the only bus service for the village uses the A274. This goal would therefore be achieved by encouraging links to the High Street, as is already set out in Headcorn's Neighbourhood Plan, although Headcorn's layout makes direct links impossible from most potential development sites. However, as the bus service is irregular, it has limited potential to significantly boost public transport usage. The constraints in relation to accessing the station are similar to those for accessing the bus service, as the village layout makes direct access difficult from new developments.

**2.41** In relation to Kent County Council's comments on active travel objectives, Headcorn Parish Council notes that Policy HNP3 Part 1 looks to promote well connected developments that can easily be accessed by foot and cycle. It therefore considers that the policy is

compatible with active travel objectives. Headcorn Parish Council notes that, as set out in HNP Policy Map 3, Headcorn Parish is a significant distance from any of the major employment and population centres in the South East, which makes broader active travel options harder to achieve. Furthermore, creating cycle lanes, for example, either within developments or in the centre of the village, did not enjoy popular support when this was tested in the 2021 Residents' Survey. In relation to sustainable transport connections, policy HNP3 Part 1 looks to create and enhance links to Headcorn High Street, which has two bus stops and is directly linked to the station (which is located further along the A274). In addition, policy HNP4 Part A ensures that development must demonstrate how it will support greater adoption of electric vehicles.

**2.42** In relation to Kent County Council's request to include explicit wording to secure funding for PRoW in HNP3, Headcorn Parish Council notes that priorities for infrastructure funding are set out in policy HNP4. The prioritisation in HNP4 Part E covers public realm priorities, which would include PRoW. The prioritisation list covers Headcorn Parish Council's share of the CIL and the precise allocation of funds will depend on which projects are likely to deliver the greatest benefit to Headcorn residents and businesses, as well as the best value for money. While Headcorn Parish Council would look favourably on proposals to strengthen or protect PRoW in the Parish, as this would help achieve its goal of strengthening connectivity, it cannot guarantee that PRoW will have funding allocated to them for all projects. Headcorn Parish Council notes that other sources of funding for PRoW are available from Maidstone Borough Council's share of the CIL, as well as section 106 payments, where used, meaning that even if Headcorn Parish Council's share of the CIL is insufficient, PRoW could still be funded.

**2.43** In relation to Kent County Council's comments on HNP3 Part 7 and the Kent Design Guide (2005), Headcorn Parish Council notes that the Kent Design Guide is not part of the Development Plan for the local area. Therefore, even if the Kent Design Guide (2005) was deemed to be a strategic policy, there would be no requirement under the Basic Conditions for the Headcorn Neighbourhood Plan to be in general conformity with this policy.

## **2.v Consideration of comments on HNP4: Infrastructure provision**

**2.44** Policy HNP4 on infrastructure provision sets the rules to ensure that specific types of infrastructure provision such as parking, broadband, water and sewerage, and promoting energy efficiency will meet the needs of local residents both now and in the future, as well as to set the priorities for infrastructure in Headcorn, reflecting local constraints. Overall the comments provided through the online survey raised points that were consistent with previous evidence gathered. In particular, the concerns raised by residents included: parking; road safety; police and crime reduction; nursery school provision; primary school capacity; the GP surgery; availability of NHS dentists; sports and recreation facilities; flood defences; and sewerage capacity. On balance Headcorn Parish Council considered that these concerns broadly reinforced its chosen policy approach.

**2.45** However, several residents also mentioned problems with water supply issues in their responses, which is a relatively new concern for Headcorn. Headcorn Parish Council notes that half of the Village was without any water supply in both 2022 and 2023. It is

important that additional development in Headcorn Parish does not exacerbate these issues. To address this issue, Headcorn Parish Council has added a paragraph setting out the background on the water supply issues to Section 8.iii. It has also made three changes to Policy HNP4 in Infrastructure provision to ensure it clearly covers water supply capacity. Explicit mention of water supply has therefore been added to the list of utilities that are a priority for infrastructure provision in Headcorn in both HNP4 part E.I.1 (covering residential development) and HNP4 part E.II.1 (covering commercial development). In addition, a new subclause has been added to HNP4 part C stating:

*“where relevant, it can be shown that the water supply can cope with any increase in demand, including at times of high demand”*

**2.46** Tunbridge Wells Borough Council, as a Neighbouring Local Planning Authority noted the set of Infrastructure priorities set out in HNP4 Part E, commenting that these may well be used by residents in Tunbridge Wells Borough in settlements close to Headcorn. Tunbridge Wells Borough Council would like to be kept up-to-date on infrastructure projects. Headcorn Parish Council considers that this reinforces the importance of ensuring that infrastructure priorities for Headcorn address Headcorn’s problems and capacity issues.

**2.47** Several respondents mentioned the need for early years/nursery education in the Village. Headcorn Parish Council considers that this reinforces its decision to make education provision (particularly nursery school provision and support for Headcorn Primary School) a higher priority than they would be under Maidstone Local Plan Policy ID1. (HNP4 Part E puts education second on the list of priorities, rather than 6<sup>th</sup> in the case of ID1.)

**2.48** Responses from Maidstone Borough Council, Kent County Council and Savills covered the parking standards set out in HNP4 Part A. Maidstone Borough Council noted that the proposals in HNP4 Part A.1 were not in conformity with Maidstone Local Plan policy DM23 on parking standards. DM23 is not a strategic policy, meaning there is no requirement to be in general conformity. Savills noted that the proposals in HNP4 Part A.1 were not in conformity with emerging Maidstone Local Plan policy LPRTRA4 on parking. Policy LPRTRA4 will not be a strategic policy, even once the emerging Local Plan has been adopted, meaning there will be no requirement to be in general conformity.<sup>1</sup> Kent County Council noted that the proposals in HNP4 Part A.1 did not align with the County Council’s adopted standards contained in Interim Guidance Note 3 (2008) of the Kent Design Guide (2005). This Guidance is not a strategic policy within the adopted Development Plan for Headcorn, meaning there is no requirement to be in general conformity.

**2.49** Headcorn Parish Council notes that the main difference between HNP4 Part A.1 and the Kent parking standards<sup>2</sup> is that it proposes greater parking provision for smaller (two bedroom) properties. Given the significant concerns around parking provision in the village, Headcorn Parish Council considers that its existing approach remains broadly appropriate,

---

<sup>1</sup> The new Appendix 4 proposed in the Maidstone Borough Council Main Modifications consultation (MM109) makes clear that LPRTRA4 will not be a strategic policy when the emerging Local Plan is adopted, and hence there will be no requirement of general conformity.

<sup>2</sup> [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0019/15535/Supplementary-guidance-residential-parking.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0019/15535/Supplementary-guidance-residential-parking.pdf)

as the parking provision for residents will be greater than under Kent County Council's policies for parking in rural villages. However, Headcorn Parish Council notes that the Kent County Council's policy also made an allowance for visitor parking, which the Headcorn Neighbourhood Plan has not done. Headcorn Parish Council has therefore added provision for this within HNP4 Part A.1, by adding:

*"together with on-street parking provision of at least 0.2 spaces per dwelling"*

**2.50** Although Headcorn Parish Council considers the text should have made clear that the parking provisions were additional to any provisions in garages (ie outdoor provision), it has added further clarification of that in the text. In relation to Kent County Council's suggestion to add cycle provision into policy HNP4 part A, Headcorn Parish Council has added a new clause four to HNP4 Part A stating:

*"provides adequate cycle parking provision"*.

**2.51** Headcorn Parish Council considers that this addition will support the existing reference to parking for bicycles in HNP4 Part E.I.3 and HNP4 Part E.II.2.

**2.52** Maidstone Borough Council noted that it did not feel that HNP4 Part E was in conformity with Maidstone Local Plan policy ID1. Headcorn Parish Council disagrees with this conclusion. Headcorn Parish Council notes that the definition of sustainable development set out in paragraph 8 of the NPPF includes the need to identify and coordinate the provision of infrastructure. Headcorn Parish Council is therefore required to do this in order to meet the basic condition of contributing to the achievement of sustainable development and having regard for national policy. Prioritising the list of infrastructure priorities in a way that matches Headcorn's specific needs is therefore both appropriate and necessary. Headcorn Parish Council notes that policy ID1 Part 4 of the Maidstone Local Plan explicitly states that:

*"This list serves as a guide to the council's prioritisation process, although it is recognised that each site and development proposal will bring with it its own issues that could mean an alternate prioritisation is used"*.

**2.53** Headcorn Parish Council has taken advantage of this flexibility to reorder the list in recognition of the fact that sites in Headcorn will need to address the specific infrastructure constraints Headcorn faces. This will help ensure that the infrastructure provided will provide value for money. In addition, in relation to CIL payments, policy HNP4 Part E explicitly only applies this prioritisation to "*Headcorn Parish Council's Community Infrastructure (CIL) revenues*", rather than all CIL revenues arising from sites in Headcorn. Therefore Headcorn Parish Council considers that its chosen policy approach is both the most appropriate one, given Headcorn's needs, and is necessary to ensure Headcorn's Neighbourhood Plan meets the Basic Conditions.

**2.54** Kent County Council suggested adding transport as a spending priority for commercial development. Headcorn Parish Council notes that outside the High Street, and businesses along the A274 (which are covered by the existing bus route), most businesses in Headcorn will have no links to public transport and adding links would not be commercially



viable. However, recognising that it may be possible for commercial development to help support improvements to transport infrastructure in some cases, Headcorn Parish Council has added transport as an additional priority at the end of the list of infrastructure priorities for commercial development set out in HNP4 Part E.2. Headcorn Parish Council's response to Kent County Council's comments on funding for PRoW is set out in section 2.iv above. Headcorn Parish Council notes that HNP4 Parts E.I and E.II cover spending on public realm, including spending on connectivity. This would include spending on the PRoW network.

**2.55** Headcorn Parish Council did not change the labelling of Figure 39 from "footpaths in the village" to "PRoW". The reason for this is that "footpaths in the village" was the wording used in the 2021 Residents' survey and needs to be retained for accuracy.

**2.56** Kent County Council also raised the issue of safety concerns from increased road usage on rural lanes, particularly for non-motorised users. Headcorn Parish Council shares these concerns, but rather than dealing with them through the policy on infrastructure spending, Headcorn Parish Council has instead amended HNP3 Part 9 to add:

*"or creating safety concerns for other road users (including pedestrians and cyclists)"*

**2.57** In response to Kent County Council's comments on the relative energy efficiency of old buildings, which may be more efficient than newer buildings, Headcorn Parish Council has added additional wording to the policy justification in Section 8.iv:

*"Opportunities should also be sought to consider how to minimise the environmental impact of development. For example, it may be more energy efficient to adapt an existing structure than to demolish it and rebuild."*

**2.58** Headcorn Parish Council is pleased that Kent County Council supports its approach to SuDS. In relation to HNP4 Part C.4, Headcorn Parish Council has added some additional clarification to the policy justification on the calculation of capacity, as Kent County Council suggested. Headcorn Parish Council notes that while sewerage undertakers may have a duty to accept new connections, there is no imperative for planning policy to mandate that such connections should take place where doing so would be detrimental.

**2.59** In line with Kent County Council's suggestion, Headcorn Parish Council has also added to the policy justification to HNP4 Part C to note that proposals to connect to the existing drainage network 'upstream' of known flooding hotspots should provide improvements to reduce flood risk off-site.

## **2.vi Consideration of comments on HNP5: Dwellings**

**2.60** Policy HNP5 on new dwellings covers both housing and gypsy and traveller pitches. This policy addresses issues such as where different types of development can be located, what the mix of provision should be in larger developments.

**2.61** Various respondents referred to Policy HNP5.I.2 on housing density and the number of dwellings per hectare that would be allowed. Headcorn Parish Council considered housing densities very carefully when deciding on its Neighbourhood Plan policies. A

housing density of 30 dwellings per hectare (the maximum under the policy) would be roughly double the existing density within the village, so this would represent a significant uplift. Headcorn Parish Council therefore considers that it has appropriately balanced the benefits of increasing densities within new developments, while still looking to maintain Headcorn's sense of place as a rural village. Headcorn Parish Council notes that Maidstone Borough Council claimed that this policy would not be compatible with the adopted Local Plan strategic Policy SP19 part 2. However, Local Plan Policy SP19 part 2 deals with the housing mix, not potential densities. In relation to the comment on the emerging Local Plan Policy LPRHou5, Headcorn Parish Council notes that the new Appendix 4 proposed in the Maidstone Borough Council Main Modifications consultation (MM109) makes clear that LPRHou5 will not be a strategic policy when the emerging Local Plan is adopted, and hence there will be no requirement of conformity.

**2.62** One respondent in their comments on the Plan as a whole mentioned the need to consider housing for the elderly. Headcorn Parish Council considers that this is addressed by HNP5 Part II.4.

**2.63** Several respondents mentioned affordable housing issues, as well as the Policy HNP5.II.5. Many residents expressed concerns about antisocial behaviour from tenants of rented affordable housing. These complaints are a relatively new phenomenon (for example they were not mentioned in earlier Residents' surveys) and coincide with a significant volume of affordable housing to rent that has been provided through several large, recent developments in the village. The complaints that have been raised reinforce Headcorn Parish Council's concerns about the impact of large volumes of affordable housing to rent in the village (where supply has significantly outpaced demand). Headcorn Parish Council is concerned that this housing is likely to disadvantage tenants, who: will be a significant distance from their support networks of family and friends; will be in a location where the cost of travel will make it hard for them to access the labour market; lack access to key facilities (for example the nearest benefits office is a significant distance away); and are in a location where the price of food and services will be high relative to more urban locations. Analysis of these issues (including analysis in Driver (2014)) had informed earlier work on Headcorn's Neighbourhood Plan and had influenced policy choices in the current Plan.

**2.64** Additional wording has been added to Section 9.iii.a to make clear that Policy HNP5.II.5 on affordable housing balances two factors. It has been chosen because affordable housing to buy best represents the needs of emerging households in Headcorn. However, it also reflects concerns about the potential negative social consequences of large scale provision of affordable housing to rent in Headcorn.

**2.65** Headcorn Parish notes that the NPPF in paragraph 29 sets out that Neighbourhood Plans should not promote less development than the strategic policies in the Local Development Plan for the Area. Maidstone Local Plan Policy SP20 Part 1 sets out that the target rate for affordable housing in rural service centres like Headcorn is 40% and the Headcorn Neighbourhood Plan will deliver this. Headcorn Parish Council notes that the proposed affordable housing mix in Policy HNP5.II.5 on affordable housing differs from the mix set out in Maidstone Local Plan Policy SP20 part 3. However, Headcorn Parish Council

considers that Policy HNP5.II.5 is both appropriate (given the evidence) and is still in *general* conformity with Policy SP20, as it delivers the same overall rate of affordable housing and Policy SP20 part 3 refers to both “*indicative* targets for tenure” and the need to take “*account of the evidence available at that time*”. This evidence should include the Headcorn specific evidence gathered to inform Headcorn’s Neighbourhood Plan. Headcorn Parish Council considers that the same considerations apply to Maidstone Local Plan Policy H1 criteria (iv), as this simply refers to policy SP20.

**2.66** In addition to the updated policy justification on affordable housing, Headcorn Parish Council has also added a new Figure 43 on the preferences amongst emerging households in Headcorn for smaller properties. To make clear that the preferences of emerging households are for properties to buy, Headcorn Parish Council has also added “*particularly properties to buy*” to Policy HNP5.II.2 on the need for developers to cater for the needs of emerging households through the provision of smaller properties to buy.

**2.67** One respondent suggested that HNP Policy Map 20 needed to be amended to reflect the allocations in the emerging Local Plan. Headcorn Parish Council feels that this would be inappropriate. It notes that both the policy justification in paragraph 9.8 and the relevant parts of Policy HNP5 are clear that the relevant boundary is the village boundary in the adopted Local Plan. The boundary will therefore evolve as new Local Plans are adopted. The emerging Local Plan does not currently have a policy map showing the Headcorn village boundary (which does not include the whole of the built up area, because some developments are rural exception sites). However, even if it did have a map that could be used, Headcorn Parish Council considers that it would be inappropriate to anticipate the outcome of the Local Plan examination, particularly as it has objected to the main new allocation in the village. In addition, Headcorn’s Neighbourhood Plan does not look to allocate sites and showing an expanded boundary before a final decision had been made on the Local Plan would be tantamount to allocating sites.

**2.68** One respondent raised the link between potential contributions to infrastructure and the size of development, with larger development potentially supporting more infrastructure investment. Headcorn Parish Council considers that the route of strategic allocations through the Local Plan process (which is supported by an examination of the evidence underpinning proposals) is a more appropriate place to consider larger developments (of more than 25 dwellings), rather than windfall development. Given the strong preference amongst residents for smaller developments, Headcorn Parish Council considers that on balance its existing proposals remain appropriate.

**2.69** One respondent mentioned a desire to see the boundary of the Conservation area expanded. The choice of boundary is not explicitly in Headcorn Parish Council’s gift. However, as set out in Section 5.ii, Headcorn Parish Council is supporting a proposal from Maidstone Borough Council to extend the area within Headcorn’s Conservation Area and to align the borders of Article 4 directions land (which enjoys even stronger protections) with the new Conservation Area boundary.

**2.70** Maidstone Borough Council queried whether HNP5 Part IV was in general conformity with Local Plan Policy SP17 (parts 1 and 7), which allows for some flexibility for

development in the countryside, providing it does not harm the character of the area and will ensure the separation of individual settlements is retained. Headcorn Parish Council notes that Part I.3 of policy HNP5 already allows some flexibility for developments in the countryside, meeting the flexibility envisaged in SP17 of the Local Plan. Headcorn Parish Council is particularly concerned about large developments in the countryside, as it considers these would be detrimental to the character of the area. Headcorn Parish Council also notes that, as drafted, HNP5 part I.3 and HNP5 part IV are in conflict. Headcorn Parish Council has therefore revised HNP5 Part IV to make clear it relates to major developments (of 10 or more dwellings).

**2.71** Maidstone Borough Council also queried whether paragraph 9.10 on the maximum size of a community self-build scheme would be in conformity with SP19 of the Local Plan. Headcorn Parish Council has amended paragraph 9.10 to make clear that the size limit for community self-build projects only applies in cases where the scheme is not within the village or does not abut the village envelope. Headcorn Parish Council does not consider that it would be appropriate for major developments (defined as 10 or more dwellings) to be granted permission in the countryside unless they form a strategic allocation within the Local Plan. It notes that community self-build schemes are not amongst the list of exceptions for building in the countryside set out in paragraph 84 of the NPPF and that rural exception sites are defined as “small sites” in the NPPF.

## **2.vii Consideration of comments on HNP6: The economy**

**2.72** Policy HNP6 on the economy covers the rules governing all business development, as well as specific rules designed to support the success of Headcorn High Street, and rules governing any future development of the Headcorn aerodrome and commercial energy generation. In general the comments provided through the online survey were focused on specific businesses that residents would like to see within the village. The Neighbourhood Plan cannot mandate the type of business that might open in Headcorn, it can simply provide a planning framework that would support them doing so, while balancing the needs of existing residents. Headcorn Parish Council has reviewed the policy in light of these comments and considers it remains appropriate.

**2.73** In relation to the comment on home working, it was unclear what the specific support was missing. However, Headcorn Parish Council notes that Policy HNP4.B on broadband provision, for example, aims to ensure that new dwellings will be supported by effective broadband precisely to support homeworking. While not specifically focused on home working, Headcorn Parish Council considers that policies such as policies on green spaces and supporting a vibrant High Street would benefit all residents, including home workers.

**2.74** In relation to earlier comments on the noise aspects of the Headcorn Aerodrome, the Headcorn Neighbourhood Plan cannot revoke an existing planning permission, it can only put rules in place to help avoid new development at the Aerodrome creating additional problems. Headcorn Parish Council considers that the proposed approach fairly balances the needs of residents and the benefits the village and its economy derive from the operation of the Aerodrome.

**2.75** In relation to Maidstone Borough Council’s comments on Policy HNP6, Headcorn Parish Council does not consider that there is a conflict between Policy HNP6 and the Maidstone Local Plan Policy SP22 criteria (1) safeguarding existing employment sites for two reasons. Firstly, Policy HNP6 parts 1-5 applies to the granting of permission for new business development, and hence supports the creation of employment opportunities. It would not be possible to use Policy HNP6 to justify the conversion of an existing employment site to residential use, for example. Secondly, Headcorn Parish Council notes that NPPF paragraph 16(f) specifically sets out that plans should “*serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)*”. Headcorn Parish Council does not therefore consider that it would be appropriate for Headcorn’s Neighbourhood Plan to be amended to duplicate policy in the Maidstone Local Plan.

**2.76** Headcorn Parish Council considered the suggestion of defining “business development” using, for example, the use class order. However, use classes can be subject to change, and Headcorn Parish Council wanted part 1-5 of its policy on the economy to apply to all business development, not simply development within certain use classes. It has therefore decided to maintain the existing approach within the policy wording, but has added an explicit mention of use classes to paragraph 10.4 in the policy justification to make clear that the policy applies to all use classes.

**2.77** In relation to Kent County Council’s comments about Headcorn Aerodrome, Headcorn Parish Council has added a mention to the Aerodrome’s status as a heritage asset to Policy HNP6.B.2 and the policy justification.

## **2.viii Consideration of comments on the decision to apply the same rules to all parts of the community**

**2.78** The decision to apply the same rules on issues such as siting and connectivity to gypsy and traveller pitches as to other forms of dwellings reflects two factors: the desire to be fair, with the same rules applying to all parts of the community; and the fact that caravans and other mobile or temporary dwellings make up a relatively high proportion of dwellings in Headcorn, meaning their impact on the built environment in Headcorn can be significant.<sup>3</sup>

**2.79** No arguments were presented through the online survey that suggested that this was the wrong approach. Maidstone Borough Council put a question mark next to whether this was OK, but did not specifically rule it out – they were simply uncertain.

**2.80** Headcorn Parish Council notes that if it had decided to allocate housing through its Neighbourhood Plan, then separately identifying the housing needs for the settled community and the gypsy and traveller community would be appropriate. However, instead Headcorn Parish Council decided to shape new developments, rather than allocate sites. It therefore considers that its approach is appropriate. It notes that if a separate policy was needed for gypsy and traveller settlements, then all the planning considerations

---

<sup>3</sup> The 2021 Census showed that caravans and other mobile or temporary dwellings made up 3.0% of Headcorn’s housing stock, compared to 0.4% for England as a whole.

underpinning the six policies and the Design Guidance in Headcorn's Neighbourhood Plan would still apply. The approach taken therefore reduces unnecessary duplication within Headcorn's Neighbourhood Plan.

### **3. CONSULTATIONS WITH MAIDSTONE BOROUGH COUNCIL**

**3.1** Headcorn Parish Council has undertaken a range of formal and informal consultations with Maidstone Borough Council throughout the development of Headcorn’s Neighbourhood Plan. When it decided to restart the Neighbourhood Plan process, it consulted with Maidstone Borough Council on possible approaches. A draft Neighbourhood Plan was shared with Maidstone Borough Council in March 2022 for comments. The Plan was reviewed in light of these comments, and a revised draft was issued in November 2022 for Maidstone Borough Council to use as the basis for consulting with statutory consultees for a formal decision on whether a Strategic Environmental Assessment is needed.

**3.2** A meeting with Maidstone Borough Council was also held October 6<sup>th</sup> 2023 to review its response to Headcorn’s Regulation 14 Consultation. At that stage Maidstone Borough Council were anticipating that the revised Maidstone Borough Local Plan would have been approved by the Local Plan Examiner and adopted by the Council by the end of January 2024. The process for adopting the Local Plan meant that Maidstone Borough would have found it hard to resource its statutory commitments under the Neighbourhood Plan regulations and requested that Headcorn Parish Council delayed its Regulation 15 Neighbourhood Plan submission. On that basis, Headcorn Parish Council agreed to delay its proposed submission of the Headcorn Neighbourhood Plan until after the new Local Plan was adopted.

**3.3** However, since then the Maidstone Local Plan Examiner has launched another consultation, which closed on February 14<sup>th</sup> 2024. It is not clear when the Examiner will issue his final recommendations, or whether the Local Plan will be able to be adopted before the May Council election period starts. Therefore, although it recognises Maidstone Borough Council’s concerns, given the benefits of having a Neighbourhood Plan in place, Headcorn Parish Council has decided to proceed with its submission under Regulation 15.

#### **3.i Consultations on Headcorn’s Neighbourhood Plan run by Maidstone Borough Council**

**3.4** In addition to the consultation and engagement by Headcorn Parish Council, Maidstone Borough Council has itself conducted several key consultations in relation to Headcorn’s Neighbourhood Plan, which have shaped Headcorn Parish Council’s approach to producing its Neighbourhood Plan. In particular, Maidstone Borough Council consulted on:<sup>4</sup>

- The decision to approve Headcorn Parish as a Neighbourhood Plan Area and for Headcorn Parish Council to be considered the relevant body under the Localism Act (2011) to produce a Neighbourhood Plan. This consultation took place in 2013 (see Appendix 1 of the Headcorn Neighbourhood Plan Basic Conditions Statement for a record of the decision).

---

<sup>4</sup> Maidstone Borough Council also undertook the Regulation 16 Consultation on the 2015 draft Headcorn Neighbourhood Plan. As noted by Headcorn’s examiner, this consultation showed exceptionally strong support for the draft Neighbourhood Plan.

- Maidstone Borough Council's screening assessment decision that Headcorn's Neighbourhood Plan did not require a Strategic Environmental Assessment or a Habitats Regulations Assessment. This consultation took place in 2023 (see Appendix 2 of the Headcorn Neighbourhood Plan Basic Conditions Statement for a record of the decision).



## **4. RESIDENTS' SURVEY IN 2021**

**4.1** This was a survey of all residents of Headcorn Parish aged 14 and over, although non-residents could also respond. It was designed to assess to what extent the views of residents had changed since the survey conducted in 2013; to gauge support for potential policy options; and to assess potential demand for housing amongst emerging households in Headcorn. The 2021 Residents' Survey was issued to residents on February 1<sup>st</sup> 2021 (with a response deadline of March 14<sup>th</sup> 2021). Unlike the previous 2013 Residents' Survey, it was conducted entirely online in order to manage COVID risks and did not benefit from volunteers knocking on doors to encourage people to respond. Instead all publicity was done online and by word of mouth. Despite this, there were 447 responses, representing over 10% of the eligible population and over 20% of households, a response rate of 56% of the previous survey.<sup>5</sup>

**4.2** The questions included asking participants about: the vision for Headcorn; the appropriate size of individual developments; preferences on where to build; preferences for specific types of housing needed, including housing for gypsies and travellers; housing need from within the household and friends and family; views on local infrastructure; traffic issues; priorities for protecting the local environment; size and tenure of property occupied; demographic details; and length of time in the Parish. A full list of questions can be found in Appendix A3.

**4.3** In general the responses provided strong support for the core policies in the previous draft Plan and aligned well with the results of earlier surveys. In particular, the Vision underpinning the previous draft Plan was overwhelmingly supported by those responding to the survey.<sup>6</sup> The responses were used to help shape policies within the Neighbourhood Plan, including for housing and infrastructure needs; the size of developments; preferences for managing the natural and historic environment; and preferences for traffic management.

### **4.i Preferences for development in the 2021 Residents' Survey**

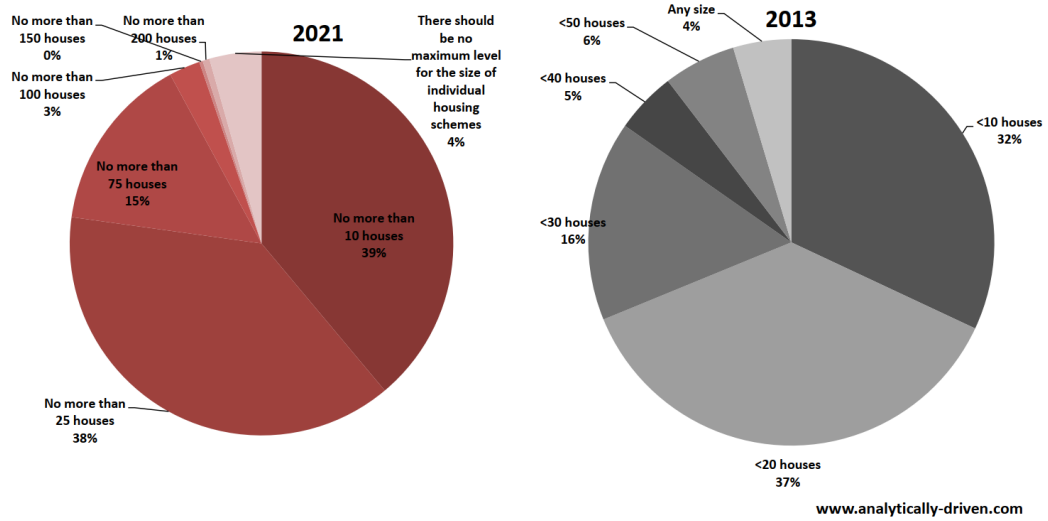
**4.4** There was very strong support for encouraging small scale development, with 77% of respondents wanting individual developments to be at most 25 houses. This was similar to the results from the 2013 survey.

---

<sup>5</sup> Of the 447 responses, there were 410 unique IP addresses, which can be used as a proxy for the number of households, meaning the response rate from households was 67% of the 2013 Residents' Survey response rate. Of those that responded in 2021, 64.8% were male (compared to 44.6% in 2013 and 47.9% in 2011 Census) and the age profile was also more skewed to the 35-65 age groups, with fewer responses from the young or very old. Around 84% of respondents in 2021 were owner occupiers; 7% privately rented; and around 5% were in affordable housing, of which around a quarter were in affordable housing to buy.

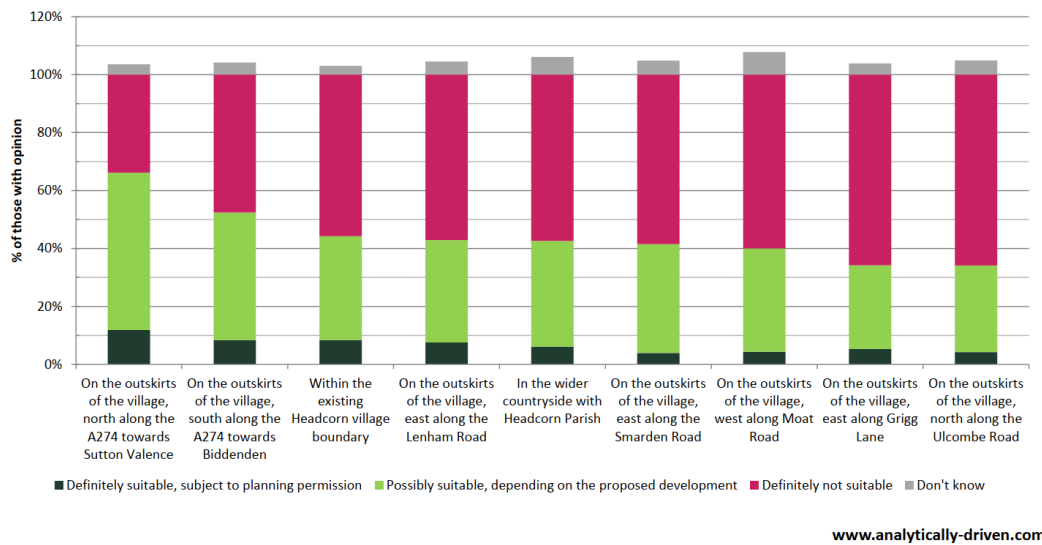
<sup>6</sup> 82% of participants in the 2021 Headcorn Residents' Survey supported the draft Vision, with an additional 15% ticking maybe. In total only 3% of residents opposed the draft Vision for Headcorn.

**Figure 3: Preferences for the size of developments in 2021 and 2013**



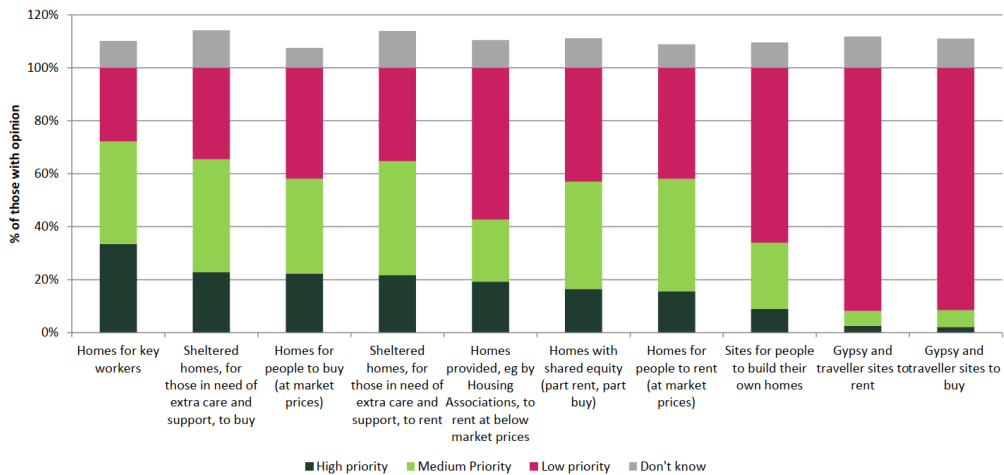
**4.5** In terms of the location for development, only development along the A274 was seen as potentially suitable by over 50% of respondents expressing an opinion.

**Figure 4: Preferences on the location of development in the 2021 Survey**



**4.6** The highest priorities for housing in Headcorn were seen as housing for key workers, sheltered accommodation and housing to buy.

**Figure 5: Priorities for housing in the 2021 Survey**



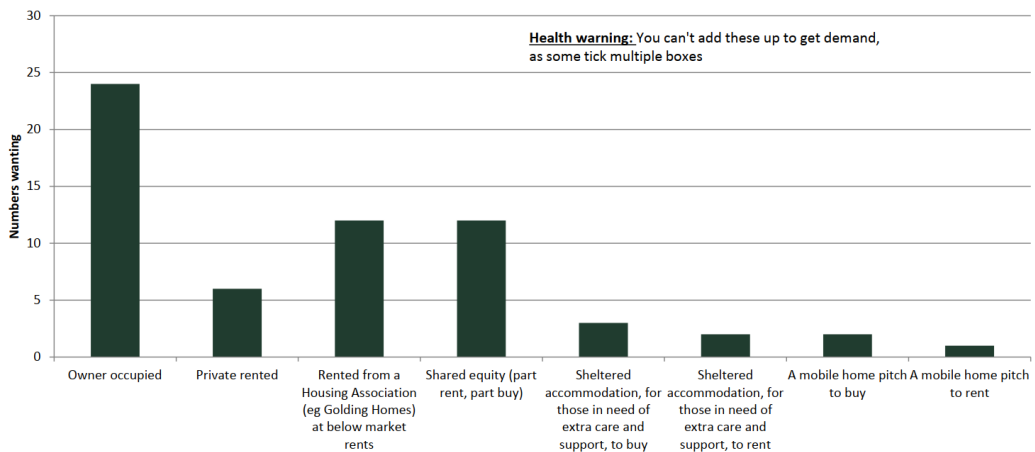
www.analytically-driven.com

A majority of respondents in the 2021 Residents’ Survey expressed a preference for the Parish Council to allocate sites through the Neighbourhood Plan. However, following discussions with Maidstone Borough Council about the progress of the Maidstone Local Plan, Headcorn Parish Council agreed that it would be counterproductive for both plans to look to allocate sites.

**4.ii Evidence on Housing Needs**

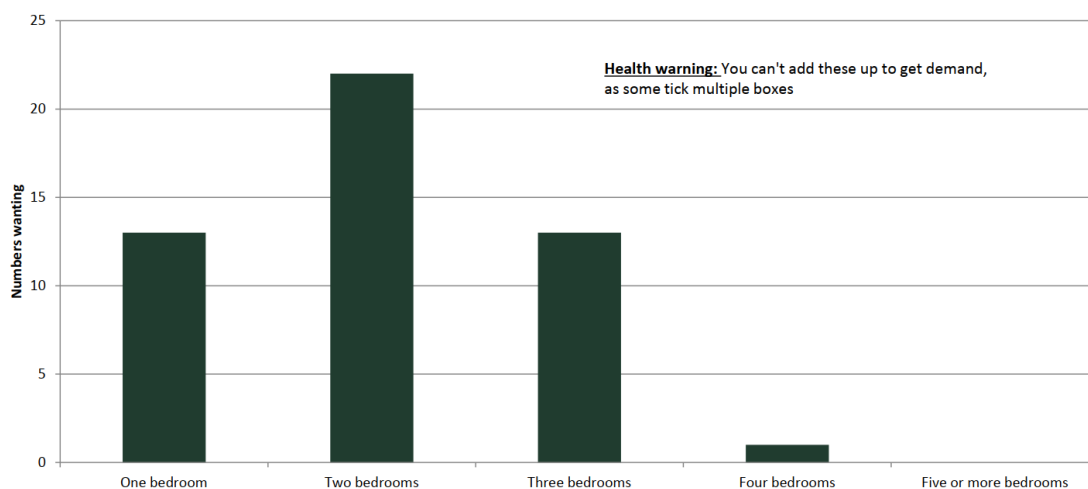
**4.7** As shown in Appendix A3, the 2021 Residents’ Survey also asked about existing and emerging housing need. Amongst emerging households, the biggest barrier to entering the housing market in Headcorn was affordability, particularly for housing to buy. Over 35% of those in emerging households saw the affordability of housing to buy as a key barrier, with just over 25% seeing the affordability of housing to rent as a barrier. There was a strong preference amongst emerging households for smaller properties and for housing to buy.

**Figure 6: Preferred tenure for existing residents in emerging households in Headcorn, 2021 Residents’ Survey**



www.analytically-driven.com

**Figure 7: Preferred size of property amongst emerging households in Headcorn, 2021 Residents' Survey**

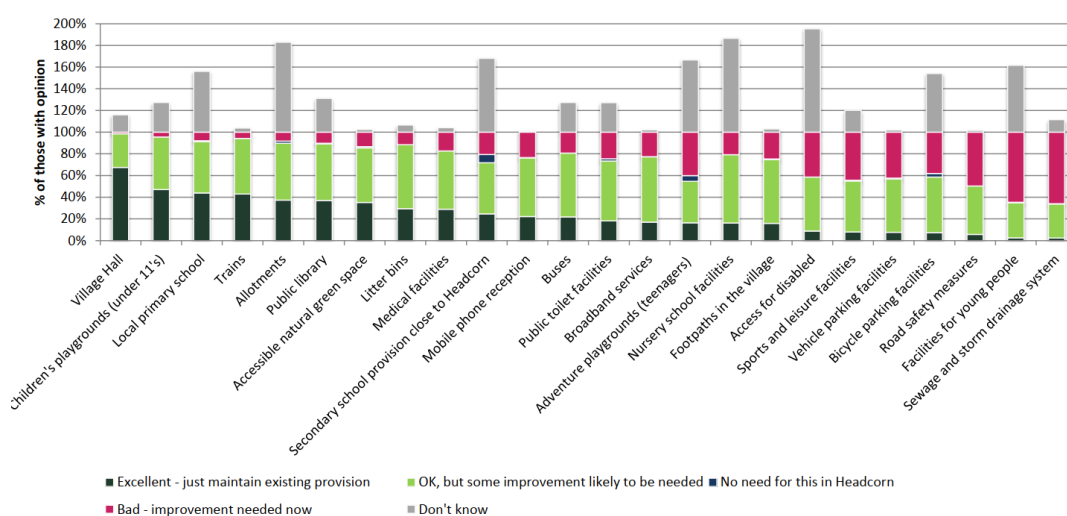


www.analytically-driven.com

### 4.iii Evidence on infrastructure

**4.8** There are significant concerns in Headcorn around the adequacy of key parts of the supporting infrastructure for the Parish. These concerns were evident in the 2021 Residents' Survey, particularly in relation to sewage and storm drainage; facilities for young people; road safety; and parking. Some parts of the local infrastructure were seen as strong, particularly the Village Hall; playgrounds for under 11s; the primary school; and the train service.

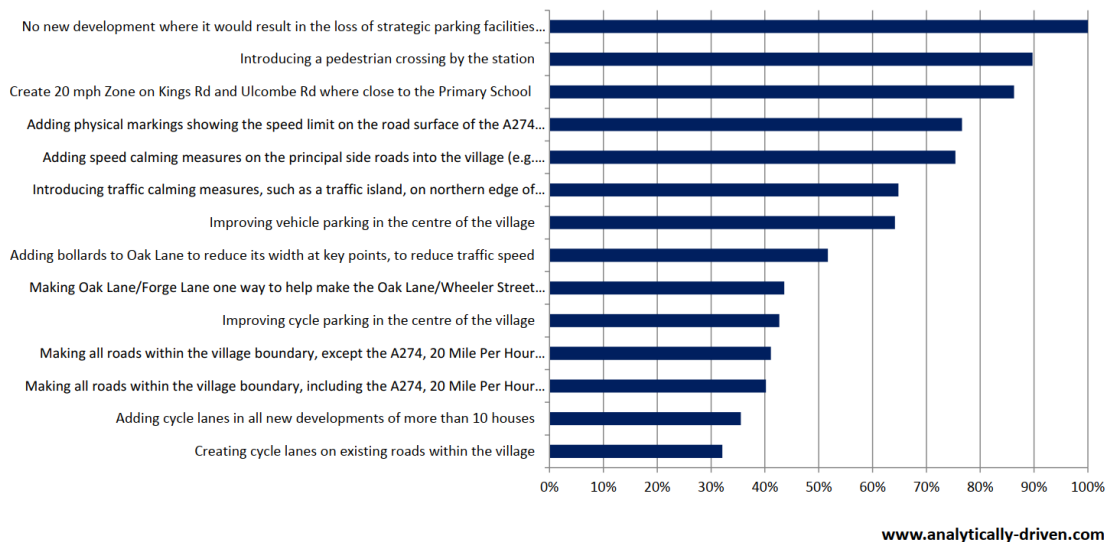
**Figure 8: Infrastructure needs, 2021 Residents' Survey**



www.analytically-driven.com

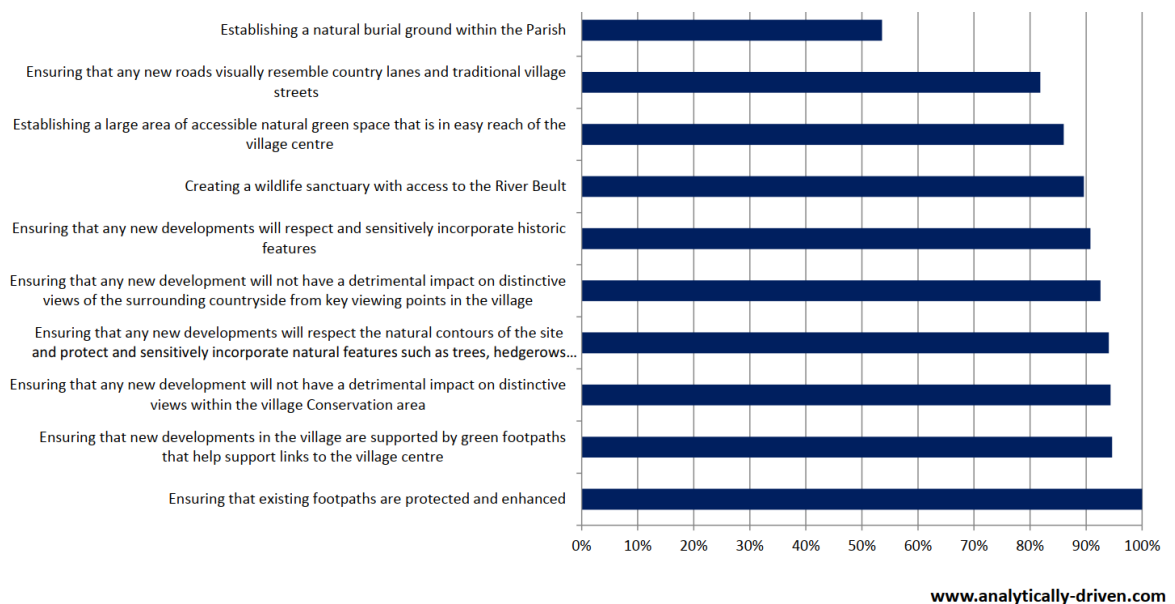
**4.9** Of the options for traffic management explored in the 2021 Residents' Survey, the options with the most support were: no loss of strategic parking facilities; a pedestrian crossing by the station; a 20mph Zone on Kings Road and Ulcombe Road, close to the Primary School; and adding physical markings showing speed limits on the A274.

**Figure 9: Preferences for traffic management options, relative support, 2021 Residents' Survey**



**4.10** All the options that Headcorn Parish Council had been considering as part of its policy development for managing the natural and historic environment were supported by at least 50% of respondents in the 2021 Residents' Survey.

**Figure 10: Preferences for managing the physical environment, relative support, 2021 Residents' Survey**



## **5. PREVIOUS CONSULTATIONS AND OTHER EVIDENCE**

**5.1** Development of the policies contained in Headcorn's Neighbourhood Plan has been informed by a significant body of evidence. Some of this evidence was gathered as part of earlier work to support the introduction of a Neighbourhood Plan, including surveys of residents and businesses;<sup>7</sup> and specially commissioned reports covering sustainability and the operation of Headcorn's sewerage system. Details of earlier survey work, as well as additional sources of evidence are provided below.

### **5.i 2015 Residents' Survey**

**5.2** As part of the Regulation 14 Consultation on Headcorn's earlier draft Neighbourhood Plan, which closed on July 31, 2015, Headcorn Parish Council also took the opportunity to undertake a short survey of residents to gauge support for specific proposals within the draft Plan. One of the questions asked was whether they supported the Plan overall, to which 93.9% responded yes.

### **5.ii 2013 Residents' Survey**

**5.3** This was a survey of all residents of Headcorn Parish aged 14 and over, with volunteers canvassing the dwellings in the Parish to talk to residents and to give fliers to all households to alert residents that the survey was being conducted. The Parish Council also used other means to alert eligible participants, such as notices on the village green and on the village website. Participants were given the option of responding on-line or on paper and asked questions in a variety of multiple choice and free text forms. The survey achieved 797 responses and it is estimated that these responses represented 612 households. Based on the data for the 2011 Census, the estimated response rate was over 28% of the eligible population and around 42% of households. Questions included asking participants about: their vision for Headcorn; what they value about living in the Parish; threats and opportunities of development; appropriate size of individual developments; support for overall development; preferences on where to build; preferences for specific types of housing needed, including housing for gypsies and travellers; housing need from within the household and friends and family; moving expectations; size and tenure of property occupied; views on local infrastructure; views on design and environmental issues; travel patterns; traffic issues; work patterns and local employment needs and preferences; demographic details; and length of time in the Parish.

### **5.iii Headcorn Survey of Businesses, 2013.**

**5.4** This was a survey of owners and managers of businesses based in Headcorn Parish. Participants were given the option of responding on-line or on paper and asked questions in a variety of multiple choice and free text forms. The survey achieved 55 usable responses, which is a 38.5% response rate, based on the estimate of 143 businesses operating in the

---

<sup>7</sup> Headcorn's approach to surveys was used as a case study produced by Planning Aid to help other Neighbourhood Planning groups think about how to gather evidence. See: <http://www.ourneighbourhoodplanning.org.uk/case-studies/view/314>.

Parish at the time of the survey, who all received notification that the survey was taking place and how to participate. Questions included asking participants about: their views on Headcorn as a location to do business; constraints on future expansion; number of employees in the business; number of employees living in Headcorn; the location of the majority of their customers; commuting patterns of the respondent; type of business; sectors that should be encouraged as part of the Neighbourhood Plan; and what would encourage businesses to locate in Headcorn.

#### **5.iv Headcorn Estate Agents' Survey, 2013.**

**5.5** This was a survey of seven estate agents, who are the main estate agents selling and renting properties in the Parish. This survey was conducted face-to-face, based on a discussion guide. Participants were asked a series of questions to help explore the demand and supply conditions in Headcorn's property market.

#### **5.v Traffic surveys.**

**5.6** Two traffic surveys were undertaken: one in 2013 and one in 2014 (to gather evidence of the impact on traffic movements of the relocation of the doctors' surgery to the outskirts of the village). The surveys were conducted mid-week, during school term time in both the morning and evening, as well as key points during the day. See Jefferys (2015) for full details.

#### **5.vi Survey of Headcorn Primary School, 2014.**

**5.7** A survey conducted by Headcorn Primary School of parents, pupils, teachers and governors to gather evidence on their preferences for the future development of the school and how to cope with the need for expansion.

#### **5.vii Feedback sessions**

**5.8** As well as the formal surveys, residents and businesses were given opportunities to feedback informally during a series of meetings held during 2013 and 2014 and these responses have also informed Headcorn's evidence base, particularly the poster sessions held in June 2014, which allowed participants to use stickers to respond to a series of questions.

#### **5.viii Position statements**

**5.9** As well as the surveys, Headcorn Parish Council also requested position statements from Headcorn Primary School and various clubs and societies in Headcorn (including the bowls club, cricket and tennis club, football club and badminton club), to help understand their needs. A position statement was also requested from the doctor's surgery, but this was not provided.

## **5.ix Analysing the overall sustainability of housing development in Headcorn**

**5.10** Headcorn Parish Council commissioned Analytically Driven Ltd to analyse how much housing development would be sustainable in Headcorn over the period 2011 to 2031. The assessment uses the definition of sustainability within the 2012 National Planning Policy Framework, which defined sustainability in economic, social and environmental terms. A key part of the analysis is assessing whether Headcorn is right location for housing to support growth and innovation (which is a crucial part of the NPPF's definition of economic sustainability). The results show that Headcorn is relatively far from key urban centres – the time, distance and cost of travel to the nearest urban centres will act as a significant barrier to those hoping to enter the labour market, for example, as well as important services such as hospital care. Not only will the distances involved make it harder for households to effectively engage in these labour markets, unless there are local jobs available in the Parish locating in Headcorn would result in commuting patterns that are significantly above average in terms of time, distance and cost. This makes Headcorn a less desirable location relative to other, better connected, options, particularly for workers on low incomes, as the cost of commuting would account for a significant proportion of their income, potentially leading them to be excluded from the labour market. See Driver (2014).

## **5.x Sustainability appraisal of possible strategic development sites in Headcorn**

**5.11** Headcorn Parish Council also commissioned the internationally-renowned consultants Levett-Therivel to undertake an assessment of the sustainability of potential strategic development sites in Headcorn village. See Therivel (2015). The site assessment exercise undertook a sustainability appraisal of 20 potential strategic housing development locations in Headcorn Parish. These sites represent the sites submitted to Maidstone Borough Council as potential sites for housing development in the Strategic Housing Land Availability Assessment consultations that Maidstone Borough Council undertook between 2012 and 2014. Sites south of the train station were not considered because they are prone to flooding, are near the River Sherway / River Beult Site of Special Scientific Interest (SSSI), and are difficult to access.

## **5.xi Headcorn foul drainage assessment**

**5.12** The results from the 2013 Residents' Survey and the Survey of Businesses in Headcorn Parish, as well as observed overflow at the manhole in Moat Road and the results of the Water Cycle Study by Halcrow Group Limited (2010) for Maidstone Borough Council all highlighted significant problems with the sewerage system in Headcorn.

**5.13** To identify how prevalent the problems were, where the problems were located and what impact any identified problems might have on the feasibility of further housing development in Headcorn, Headcorn Parish Council commissioned Sanderson (Consulting Engineers) Ltd to undertake an assessment of the sewerage system in Headcorn village. This followed explicit advice from the Head of Planning at Maidstone Borough Council that



in order to be considered as a constraint, more specific information on the relevant issues was needed.

**5.14** The study was a modelling exercise based on information provided by Southern Water, which is the company responsible for sewerage in Headcorn. Results from the study identified that the current system has significant problems, including:

- 15 sewage pipes that already have insufficient capacity, including 9 locations, totalling some 432m linear run, on the main distribution network;
- 14 sewage pipes that suffer from back-fall (where sewage is trying to flow uphill);
- 74 sewage pipes (around 60% of the sewerage network in the village) where the pipes are not self-cleaning due to inadequate velocity; and
- 6 sections of sewage pipes that suffer from all three problems.

**5.15** These problems are in evidence throughout the village and include several sections of major pipework that are important for the functioning of the entire sewerage system in the village – in other words, problems are not simply confined to small, localised areas. The results also highlighted that Southern Water’s records are far from complete, with at least some data missing for 45% of the manholes in the village, suggesting further problems might emerge when more accurate records are available. For example, the problem section of sewerage in Moat Road could not be modelled, because Southern Water’s records suggested that sewage flowed in both directions, something that is unheard of in engineering terms. See Sanderson (Consulting Engineers) Ltd (2015) for full results.

### **5.xii Other sources of evidence**

**5.16** In addition to the evidence specifically gathered to support Headcorn’s Neighbourhood Plan, the analysis supporting this Neighbourhood Plan makes use of a variety of data sources provided by the Office for National Statistics (ONS), including: the Census data for 2001, 2011 and 2021; the Business Register and Employment Survey; and the ONS mapping tool for rural-urban classifications. In most cases the data for Headcorn refer to Headcorn Parish, but where the data refer to either Headcorn Ward or Headcorn Village (i.e. the built-up area of Headcorn) that is made clear in the text. As well as national statistical sources, the analysis has also used the evidence collected by Maidstone Borough Council to inform its Local Plan.

## APPENDIX 1: 2023 REGULATION 14 CONSULTATION PROCESS

**6.1** The process for introducing a Neighbourhood Plan is set out in the Neighbourhood Planning (General) Regulations 2012 (UK Statutory Instrument 2012 No. 637).<sup>8</sup> The Regulation 14 consultation (also known as the pre-submission consultation) is the consultation that takes place before Headcorn Parish Council formally submits the Neighbourhood Plan to Maidstone Borough Council. This Appendix sets out the process that Headcorn Parish Council took in conducting its 2023 Regulation 14 consultation on the Headcorn Neighbourhood Plan. Section 2 and Appendix 2 provide details of the results.

**6.2** A Regulation 14 consultation must run for at least 6 weeks. Headcorn Parish Council undertook its Regulation 14 consultation between June 22<sup>nd</sup> and August 14<sup>th</sup> 2023. The decision to hold the consultation for a seven and a half week period (rather than the statutory six) reflected the fact that Headcorn Parish Council was keen to receive as many responses as possible, and was aware that the consultation would coincide with the summer holidays for many people. The draft Neighbourhood Plan used for the Regulation 14 consultation was finalised in June 2023. The June 2023 draft plan had only minor changes compared to the November 2022 draft Neighbourhood Plan that was used as the basis for the Strategic Environmental Assessment and Habitats Regulation Assessment undertaken by Maidstone Borough Council.<sup>9</sup>

**6.3** Headcorn Parish Council was responsible for running and publicising the Regulation 14 consultation in a manner that is likely to bring it to the attention to anyone who lives, works or does business in the Parish. Headcorn Parish Council launched the consultation from its website, providing a link to the draft Neighbourhood Plan; a link to an online survey which it created to help structure responses (see section A1.i); and a set of Frequently Asked Questions, which covered:

- What is a Neighbourhood Plan for?
- What is the area covered by Headcorn's Neighbourhood Plan?
- What policies are included in Headcorn's Neighbourhood Plan?
- Does the Headcorn Neighbourhood Plan allocate any sites for development?
- What is the process for adopting Headcorn's Neighbourhood Plan and how can I help make this happen?
- What does the Regulation 14 Consultation mean and what do I need to do?
- How have the views of residents been taken into account in deciding what policies should be in Headcorn's Neighbourhood Plan?
- Who owns Headcorn's Neighbourhood Plan?
- What is the difference between Maidstone's Local Plan and Headcorn's Neighbourhood Plan?

---

<sup>8</sup> <https://www.legislation.gov.uk/ukSI/2012/637/contents/made>

<sup>9</sup> The differences between the November 2022 draft (used for the SEA consultation) and the June 2023 draft were: an updated timeline, to reflect the delays in obtaining the SEA consultation results; and the updating of some of the background data to reflect the publication of Census 2021 data for Headcorn (using data for Lower layer Super Output Areas E01024364: Maidstone 017A and E01024365: Maidstone 017B, which together make up Headcorn Parish).

- Does Headcorn’s Neighbourhood Plan need a Strategic Environmental Assessment?
- What will Headcorn’s Neighbourhood Plan do about parking and traffic issues?
- How will Headcorn’s Neighbourhood Plan influence infrastructure provision?
- How will Headcorn Neighbourhood Plan policies help the environment?
- What approach does Headcorn’s Neighbourhood Plan propose for Gypsy and Traveller development?
- It didn’t work last time we tried to introduce a Neighbourhood Plan for Headcorn, why will this time be different?

**6.4** To publicise its Regulation 14 Consultation, Headcorn Parish Council advertised on social media; an independent Parish Newsletter (run by a village volunteer); parish noticeboards; and also arranged a large 2mX2m banner to be placed in a prominent position on Days Green in the centre of the village. Copies of the Neighbourhood Plan were made available in the Parish Office and at the Library and people could also purchase a printed copy of the Neighbourhood Plan from the Parish Council for £10. To make it easy for people to respond, several of the notices (including the notices on Days Green and the parish noticeboards) provided a QR Code to take people to the Neighbourhood Plan section of the Headcorn Parish Council website, which included a link to the survey. As well as advertising at the consultation launch, Headcorn Parish Council also issued several reminders during the consultation process. Examples of the publicity used are shown in section A1.iii.

**6.5** In addition, under the Regulation 14 process, the Parish Council also needed to consult: Maidstone Borough Council; Kent County Council; all the adjoining Borough and Parish Councils; as well as all the consultation bodies listed in Schedule 1, paragraph 1 of the Regulations. The Parish Council emailed the relevant organisations, as well as key businesses and developers operating in the Parish, at the start of the consultation on June 22<sup>nd</sup> 2023 and sent follow up emails on 20<sup>th</sup> July 2023 and 3<sup>rd</sup> August 2023. A list of the organisations consulted in this way is shown in section A1.ii.

### **A1.i Online 2023 Regulation 14 Questionnaire**

**6.6** The online survey used for Headcorn’s 2023 Regulation 14 Consultation was created in SurveyMonkey, with a link provided from the Headcorn Parish Council website. It had an option to respondents to stop after they had responded to questions about the Plan as a whole, or to continue and provide views on individual policies. To keep the consultation survey as simple as possible, Headcorn Parish Council made a decision not to explicitly consult on the Vision underpinning Headcorn’s Neighbourhood Plan as support for the Vision had already been tested through the 2021 Residents’ Survey.<sup>10</sup> The Survey did collect information on the nature of respondents’ links to the Parish, and whether they were responding on their own behalf, or on behalf of an organisation, to help understand what might be driving responses. The Survey used is provided below.

---

<sup>10</sup> 82% of participants in the 2021 Headcorn Residents’ Survey supported the draft Vision, with an additional 15% ticking maybe. In total only 3% of residents opposed the draft Vision for Headcorn.



Headcorn Matters - A Neighbourhood Plan for Headcorn Parish

**Headcorn Matters: Regulation 14 Consultation on Headcorn's Neighbourhood Plan**

**Thank you for helping Headcorn Parish Council support the local community, by responding to this short survey. Your views really matter, as they will help shape the future of Headcorn! The deadline for responses is August 14th 2023.**

\* 1. It will help us to know why you are taking part in this consultation, as the Examiner for Headcorn's Neighbourhood Plan will need to know what different groups think. Why are you interested in what happens in Headcorn? [Tick one]

- I live in Headcorn
- I work in Headcorn
- I live and work in Headcorn
- I have family in Headcorn
- I am responding on behalf of an organisation (please specify which organisation)

Other

2. Do you support Headcorn's Neighbourhood Plan? [Tick one]

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

3. Please use this space, if you would like to give reasons for your answer (optional)

\* 4. Thank you, that's helpful feedback and if you wish you can exit now. However, it would also help us to know what you think about the six individual Headcorn Neighbourhood Plan policies, if you have time to answer a few more questions. Do you want to continue?

- Yes - I want to continue with the survey
- No - I would prefer to exit the survey



Headcorn Matters - A Neighbourhood Plan for Headcorn Parish

Design Policy

**HNP Policy 1: Design policy sets the overall framework governing the look and feel of developments in Headcorn, and rules to try and ensure that new developments will be good neighbours to the existing community. It is supported by Design Guidance that assesses what gives Headcorn its sense of place. The Design Guidance contains lots of photographs and maps to show what makes a successful (and not so successful) development in Headcorn's context.**

5. Do you support the Design policy?

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

6. Do you support the Design guidance?

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

7. Please use this space, if you would like to give reasons for your answers (optional)



Headcorn Matters - A Neighbourhood Plan for Headcorn Parish

Siting, landscaping and protecting the natural and historic environment and setting

**HNP Policy 2: Siting, landscaping and protecting the natural and historic environment and setting sets the rules to determine how developments should sit within the landscape and the historic features of the village and surrounding countryside. It provides rules on how to preserve and enhance key features that help support wildlife, such as trees and hedgerows. It provides rules on avoiding areas that are known to flood, as well as measures to help ensure that new development does not worsen flooding elsewhere.**

8. Do you support the policy on siting, landscaping and protecting the natural and historic environment and setting?

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

9. Please use this space, if you would like to give reasons for your answer (optional)



Headcorn Matters - A Neighbourhood Plan for Headcorn Parish

Connectivity and access

**HNP Policy 3: Connectivity and access is designed to try and ensure that developments are safe and well-connected, and recognise particular constraints in Headcorn.**

10. Do you support the policy on connectivity and access?

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

11. Please use this space, if you would like to give reasons for your answer (optional)



## Headcorn Matters - A Neighbourhood Plan for Headcorn Parish

### Infrastructure provision

**HNP Policy 4: Infrastructure provision sets rules for specific types of infrastructure provision such as parking, broadband, water and sewerage, and promoting energy efficiency. For example, the policy looks to ensure that strategic parking provision that supports the High Street, as well as key services such as the Station and Doctors' surgery, will not be lost and that new developments will have enough parking to support their residents' needs.**

The policy also sets out local priorities for ten specific types of infrastructure provision, in order to help ensure that money for infrastructure is spent where it is most needed and that new developments will be successful. These priorities reflect local constraints and have been informed by the Headcorn Residents' Surveys. The priorities aim to try and ensure infrastructure provision for developments in Headcorn will meet the needs of their residents, will not exacerbate existing problems and (where possible) will also contribute to improving outcomes for the Parish as a whole. Reflecting the results from Residents' Surveys, the top three proposed priorities for infrastructure identified in Headcorn's Neighbourhood Plan are:

- Utilities (particularly sewerage provision, storm drainage and broadband);
- Education (particularly nursery school provision and continued support for the development of Headcorn Primary School in line with needs); and
- Public realm (particularly road safety priorities, parking (including parking for bicycles), disabled access, flood defences and connectivity).

12. Do you support the policy on infrastructure provision?

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

13. Please use this space, if you would like to give reasons for your answer (optional)





## Headcorn Matters - A Neighbourhood Plan for Headcorn Parish

### New dwellings

**HNP Policy 5: New dwellings** covers issues such as where different types of development can be located, the preferred mix of provision in larger developments, and the appropriate range of housing densities (dwellings per hectare) to help maintain Headcorn's sense of place. It proposes a higher share of First Homes and affordable housing to buy than the mix of dwellings set through Maidstone Borough Council's Local Plan. Where possible it also seeks to limit the number of new homes in individual windfall developments to at most 25 new homes in any development in (or immediately next to) the village and 2 homes in the countryside. These limits reflect a strong preference for smaller developments amongst residents. [*Windfall development refers to proposals that are given planning permission, but are not included as allocated sites within an adopted Local or Neighbourhood Plan.*]

Headcorn's Neighbourhood Plan does not allocate specific sites for development and therefore does not include any allocated sites for either housing or gypsy and traveller pitches. However, it does have policies that aim to shape development, including the development of windfall sites. In the case of gypsy and traveller development, under Headcorn's Neighbourhood Plan the same rules will apply to gypsy and traveller pitches as to other forms of dwellings. This is different to the approach taken in most planning policy, which typically sets different policies for gypsy and travellers and the settled community. The decision to propose applying the same rules under Headcorn's Neighbourhood Plan reflects two factors:

- the desire to be fair, by applying the same rules to all parts of the community; and
- the fact that the impact of caravans and other mobile or temporary dwellings on the built and man-made environment in Headcorn can be significant, making it important that they meet the same standards as other development.

14. Do you support the policy on new dwellings?

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

15. Do you support the proposal to apply the same rules to everyone, whoever they are and whatever their background?

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

16. Please use this space, if you would like to give reasons for your answers (optional)



Headcorn Matters - A Neighbourhood Plan for Headcorn Parish

The economy

**HNP Policy 6: The economy covers the rules governing all business development, as well as specific rules designed to support the success of Headcorn High Street, and rules governing any future development of the Headcorn aerodrome and commercial energy generation.**

17. Do you support the policy on the economy?

- Yes. Strongly support
- Yes. Partially support
- No. Don't support

18. Please use this space, if you would like to give reasons for your answer (optional)



Headcorn Matters - A Neighbourhood Plan for Headcorn Parish

**Thank you for completing our survey!**  
**It will really help Headcorn Parish Council in its work to support the local community.**

**Just click on the Done button to exit the survey.**

## A1.ii Organisations consulted

**6.7** The organisations consulted For Headcorn Parish Council’s Regulation 14 Consultation on its Neighbourhood Plan are listed below. All organisations were contacted by email, with an initial email sent on June 22<sup>nd</sup> 2023 and follow up emails on 20<sup>th</sup> July and 3<sup>rd</sup> of August 2023. Responses were obtained from 14 organisations:

- Maidstone Borough Council
- Kent County Council
- Historic England
- National Gas Transmission
- National Grid Electricity Transmission
- Highways England
- Tunbridge Wells Borough Council
- NHS
- Loose Parish Council
- Cranbrook and Sissinghurst Parish Council
- Chart Sutton Parish Council
- Headcorn Cricket and Tennis Club
- Heart of Kent Hospice
- Savills for Catesby Estates

<b>Organisations and businesses consulted:</b>		
Age UK	Headcorn School	Natural England
Ashford Borough Council	Headcorn Scouts	Network Rail
Boughton Malherbe Parish Council	Headcorn Tennis Club	NHS Primary Care
British Red Cross	Homes England	Southeast Water
Broomfield & Kingswood Parish Council	Highways Agency	Southern Water
Chart Sutton Parish Council	Historic England	Sport England
Citizens Advice Bureau	KCC Education	Staplehurst Parish Council
CPRE	KCC Highways	Sutton Valence Parish Council
Cranbrook & Sissinghurst Parish Council	KCC planning	Tovil Parish Council
DHA Planning	KCC Protect Kent	Tonbridge & Malling Council
East Sutton Parish	KCC waste	Tunbridge Wells

Council		Borough Council
Environment Agency	Kent Ambulance	UK Power Networks
Federation of Small Businesses	Kent association for the Blind	Ulcombe Parish Council
Harrietsham Parish Council	Kent Fire & Rescue	Weald Of Kent Protection Society
Headcorn Anglican Church	Kent Invicta Chamber of Commerce	Wealden Homes
Headcorn Angling Club	Kent Liberal Jewish Community	Woodland Trust
Headcorn Baptist Church	Kent Police	Courtley Consultants Limited
Headcorn Bowls Club	Lenham Parish Council	Persimmon Homes
Headcorn Catholic Church	Loose Parish Council	Catesby Estates
Headcorn Cricket Club	Maidstone Borough Council	Mono Consultants
Headcorn Football Association	Medway Internal Drainage Board	Trading Services London
Headcorn Girl Guides	Mobile Operators Association	Coal Authority
Heart of Headcorn	National Grid	Marine Management Organisation
<b>Businesses in Headcorn:</b>		
Beatty Boo's	Headcorn Home and Hardware	Tap 17
Weald of Kent Golf Club	Lee's Garden	Jack Attwood
Forstal Osteopathy	Photo Factory	Peppercorn Framing
Sainsbury's Local	Simon Miller	Pymans
Speedgate	Enhance Hairstyling	Orchard House Dental Practice
Costcutter	Headcorn Eye Centre	Claas
Cut Above	Nics Fitness	Rowans KS (Chartered Accountants)
Dorothy Shaw Interiors	Post Office	Print Big.co.uk
Laufin Beauty	Eden Estates	Sweet William Florest
Heart of Kent Hospice	Bake my Day	Headcorn Gifts and Music
Family Funeral Service	Bowjangles	The Yard
Medivet	George and Dragon	Factory Shop
Wards	Revells Travel Agency	The Wealden Dental Practice
Sue Ryder Charity Shop	Storage Planet	The White Horse

### A1.iii Examples of the Regulation 14 publicity

**6.8** On June 22<sup>nd</sup> 2023, at the start of the Headcorn Neighbourhood Plan Regulation 14 consultation, the Headcorn Neighbourhood Plan website (run by the Parish Council) was updated with information about the Regulation 14 consultation and a link to the Survey; notices were placed on the parish notice board and the notice board at the library; a large 2mX2m banner was placed in a prominent position on Days Green at the centre of the village; and information was posted on the Parish Council's Facebook and Instagram pages.

**Figure 11: Extracts of the main Headcorn Neighbourhood Plan website page – the Regulation 14 launch**

**Headcorn Matters**

## HEADCORN MATTERS – A Neighbourhood Plan for Headcorn Parish

*Headcorn Parish Council wants to hear your views!!!*

Headcorn Parish Council has been working to introduce a Neighbourhood Plan for Headcorn Parish. It has already used Residents' Surveys to understand people's needs and preferences. This consultation on the draft Plan is the next step in the process.

**Start Survey**

**Why introduce a Neighbourhood Plan for Headcorn?**

It is in everyone's interests to have a Neighbourhood Plan. Neighbourhood Plans are a great way for local communities to help shape development in their area. It helps make sure any housing provided meets local needs, and that the design of new developments will reflect local preferences and help protect the things that matter to the local community. Every time someone applies for planning permission, the Neighbourhood Plan will be a key consideration in deciding if it meets the standard or not. In addition, having a Neighbourhood Plan in place means that the local community gets a greater say about what infrastructure is provided and more money to put towards it.

2. Siting, landscaping and protecting the natural and historic environment and setting;
3. Connectivity and access;
4. Infrastructure provision;
5. New dwellings; and
6. Headcorn's economy.

To find out more, please see our [Frequently Asked Questions](#). The full Headcorn Neighbourhood Plan can be found [here](#). There are also hard copies of the draft Headcorn Neighbourhood Plan available for people to read at the Parish Office (attached to the Village Hall) and at the library. Residents can also obtain a hard copy of the Neighbourhood Plan via the Parish Office at a cost of £10 (to cover the cost of printing).

**What happens next?**

After this Consultation finishes, Headcorn Parish Council will assess the responses and decide if changes are needed to Headcorn's Neighbourhood Plan. There will then be another consultation (run by Maidstone Council) and an examination. If Headcorn's Plan passes, there will then be a referendum, so residents can vote to decide if the final Plan should be adopted.

*Please help us by answering some questions about whether you agree with our proposals, by taking this quick survey.*

**Thank you for helping Headcorn Parish Council in its work to support the community**

If you have a friend, family member or neighbour who has not got access to the internet then please advise them that the Parish Office will be open on Tuesdays and Thursdays between 10am and 12noon (or by appointment) for Parishioners to come in and complete the survey.

The consultation closes on August 14<sup>th</sup> 2023.

**Figure 12: Notices placed on parish and library noticeboards on June 22<sup>nd</sup> 2023**

**HEADCORN NEEDS YOU!**  
Have your say on Headcorn's Neighbourhood Plan

We have been working to introduce Neighbourhood Plan for Headcorn Parish.

Residents and organisations are encouraged to respond to the survey - we are keen to hear your views!



**TAKE THE SURVEY HERE:**



Or go to:  
[www.headcornpc.org/headcorn-neighbourhood-plan](http://www.headcornpc.org/headcorn-neighbourhood-plan)

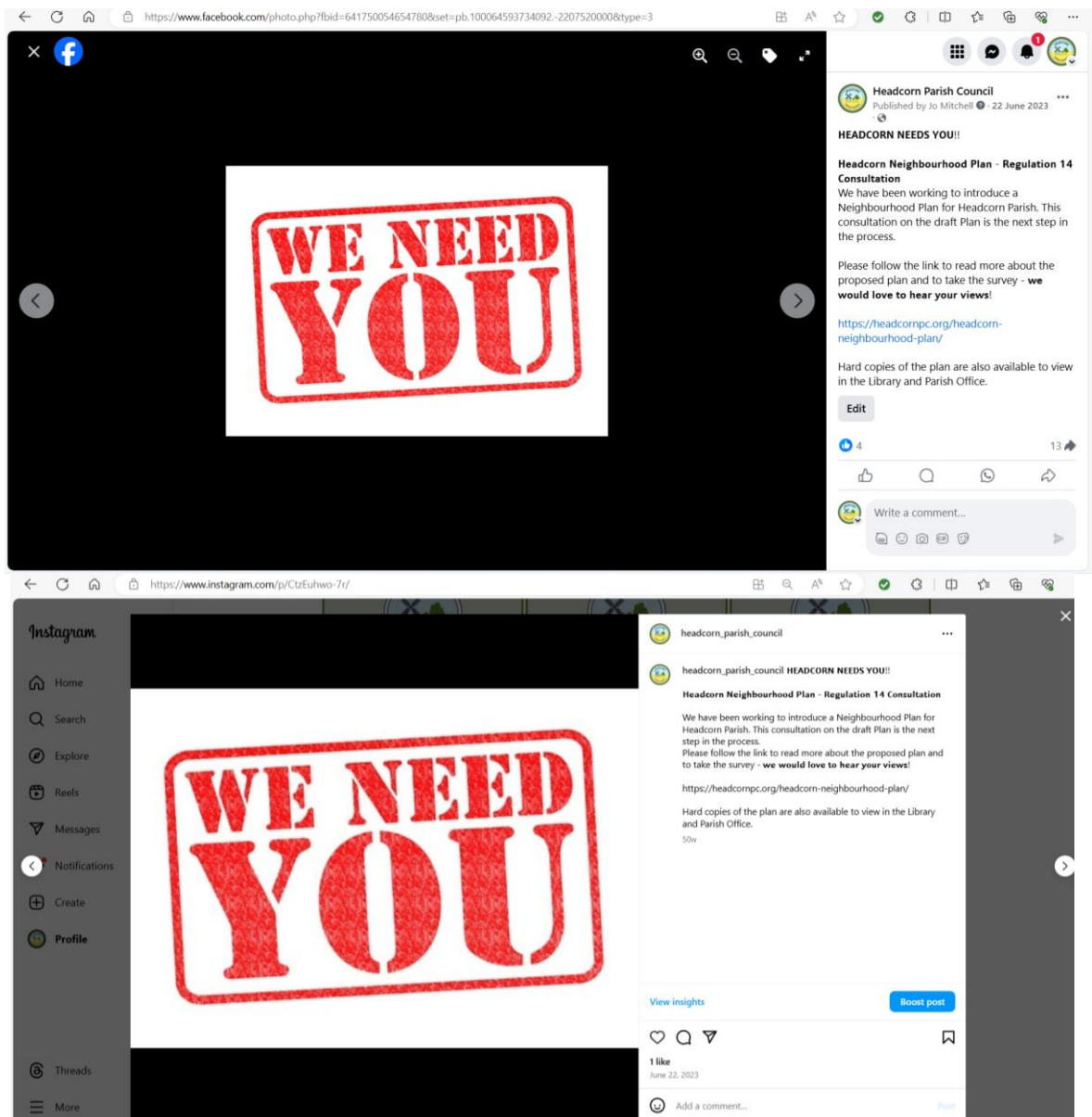
For those without access to the internet:  
The Parish Office will be open on Tuesdays and Thursdays between 10am and 12noon (or by appointment) for Parishioners to come in and complete the survey.

Deadline for responses:  
14th August 2023

01622 892 496 - [clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)

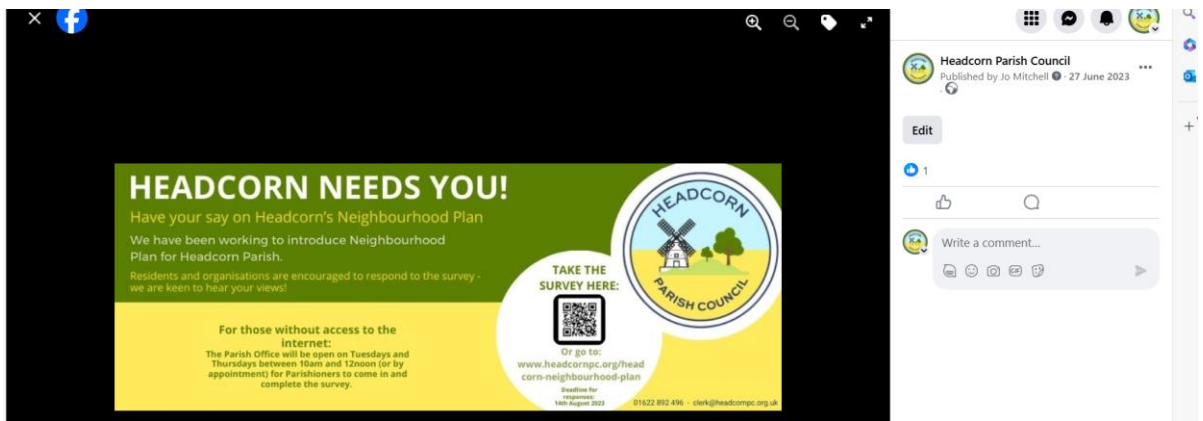


Figure 13: Facebook and Instagram posts on June 22<sup>nd</sup> 2023



6.9 As well as the Facebook post when the Regulation 14 Consultation was launched, on June 27<sup>th</sup> 2023 Headcorn Parish Council created a cover photo for its Facebook page which was displayed throughout the rest of the Consultation period.

**Figure 14: Facebook Cover photo, launched June 27<sup>th</sup> 2023**



**6.10** The Parish Council also publicised the Regulation 14 Consultation using an independent newsletter run by a volunteer. The newsletter alerted people to the fact that the Regulation 14 consultation was due to start soon in the newsletter on June 1<sup>st</sup> 2023, in order to raise awareness. The consultation was publicised in the next newsletter on July 1<sup>st</sup> 2023: <https://mailchi.mp/headcornvillage/july2023newsletterfromheadcornvillage>. This included both a write up in the main section of the newsletter, as well as a prominent piece in the Headcorn Parish Council news section. The 1<sup>st</sup> August 2023 newsletter included a reminder, as well as a photo of the banner on Days Green: <https://mailchi.mp/headcornvillage/august2023newsletterfromheadcornvillage>.

**Figure 15: Headcorn Village newsletter July 1<sup>st</sup> 2023**




**Figure 16: Headcorn Village newsletter August 1<sup>st</sup> 2023, with photo of Days Green banner**

Parish Council News This Month



Here is this month's roundup of news from your Parish Council. To contact the Parish Council email: [clerk@headcomp.org.uk](mailto:clerk@headcomp.org.uk)

If you would like to make an appointment to meet with the Clerk then do email and let them know your preferences for times.



**Neighbourhood Plan**

There is still time to have your say in the Neighbourhood Plan Survey.

The Neighbourhood Plan is a valuable tool to allow us to shape development in the Parish, guiding everything from housing design to infrastructure to protecting the landscape. Without it the community would have less ability to control these matters and less access to funds to support them.

So, we now need your help. Please follow the link HERE: <https://headcomp.org/headcorn-neighbourhood-plan/> to take the survey, view the document and see answers to key questions. The deadline for responses is 14th August. Thank you!

The image shows a banner for the Headcorn Neighbourhood Plan survey. The banner is white with black and red text. It says 'HEADCORN Reads You!' at the top, followed by 'Please say yes to Headcorn's Neighbourhood Plan'. Below that, it says 'Take the Survey for your voice' and 'Deadline for responses: 14th August 2023'. The banner is posted on a wooden fence.

## APPENDIX 2: DETAILED 2023 REGULATION 14 RESPONSES

**7.1** This Appendix contains the comments and detailed responses from the people and organisations responding to the 2023 Regulation 14 Consultation on Headcorn’s Neighbourhood Plan. The 2023 Regulation 14 Consultation ran from 22<sup>nd</sup> June 2023 until 14<sup>th</sup> August 2023.

**7.2** The majority of responses to the Regulation 14 Consultation were made using an online survey, which was provided through the Headcorn Parish Council website and is set out in Appendix A1. As well as being used by residents of the Parish, the survey was also used by six organisations: NHS, Tunbridge Wells BC, Cranbrook and Sissinghurst Parish Council, Headcorn Cricket and Tennis Club, Heart of Kent Hospice and Chart Sutton Parish Council.

**7.3** This survey captured both the level of support for proposals using multiple choice questions, as well as providing an opportunity for individual comments. A high level summary of the multiple choice responses is provided in section A2.i and verbatim comments are shown in A2.ii.

**7.4** In addition to the online comments, Headcorn Parish Council received 8 responses through letters or emails, and these are set out in section A2.iii.

### A2.i 2023 Regulation 14 Consultation Online Survey multiple choice responses

**7.5** The majority of respondents to Headcorn’s Neighbourhood Plan used the online Survey, with 253 responses received using the Survey. This was more than the 215 responses received for the 2015 Regulation 14 Consultation on a previous draft of Headcorn’s Neighbourhood Plan. A summary of the responses to the multiple choice questions is shown below.

**Table 1: Responses to multiple choice questions, 2023 Regulation 14 Consultation**

	The Plan	Design Policy	Design Guidance	Siting, landscaping and protecting the natural and historic environment and setting	Connectivity and access	Infrastructure provision	New dwellings	Same rules to everyone, whoever they are and whatever their background	Economy
Yes. Strongly support	166	123	118	136	120	130	96	112	110
Yes. Partially support	78	44	48	22	27	21	46	23	33
No. Don't support	9	11	11	5	13	9	10	15	8
Total Responses	253	178	177	163	160	160	152	150	151
% strongly supporting	65.6%	69.1%	66.7%	83.4%	75.0%	81.3%	63.2%	74.7%	72.8%
% partially supporting	30.8%	24.7%	27.1%	13.5%	16.9%	13.1%	30.3%	15.3%	21.9%
% not supporting	3.6%	6.2%	6.2%	3.1%	8.1%	5.6%	6.6%	10.0%	5.3%

## **A2.ii Comments from the 2023 Regulation 14 Consultation Online Survey on Headcorn's Neighbourhood Plan**

**7.6** Most respondents to the online Regulation 14 consultation survey simply responded to the multiple choice questions regarding their level of support for the plan and its underlying policies. However, some respondents took the opportunity to provide comments on the Headcorn Neighbourhood Plan as a whole, as well as individual policies. This section covers the verbatim comments from those who responded to the Regulation 14 Consultation using the Online Survey set out in Appendix A1.

**7.7** The comments are separated into comments on the Neighbourhood Plan as a whole, followed by comments on the six plan policies. In the case of HNP5, the comments also cover the supplementary questions assessing support for the proposal to apply the same policies to all dwellings, regardless of the background of the applicant. To help understand the views of commenters, in each case the comments are organised into those strongly supporting, partially supporting and not supporting the proposed policy or plan.

### **A2.ii.a Comments on: Headcorn Neighbourhood Plan as a whole**

Number of comments: 57

#### **Comments from those strongly supporting:**

Because Headcorn is growing at such a rate, it's getting out of control.

A great, well thought out document to be commended. As a nearby Parish Councillor, I have a couple of suggestions. In 'Setting the Scene' where you refer to Cranbrook School, should it also be added that it is a selective school? Also, I found HNP Policy Map 10 difficult to read - could this be offered in a larger format elsewhere?

Any plan which improves life for residents in Headcorn should be considered positively

Apart from the good design and planning points established in the HNP it will also mean we have more CIL allocated from Development in the Village which will in turn allow for more infrastructure projects to be carried out by HPC.

Badly needed to try and have some kind of control over development

Because this is a beautiful village to live in, yet the council keep putting more social housing here, therefore bringing more antisocial behaviour to the area.

Headcorn has grown rapidly and needs to develop infrastructure any new developments. This plan helps to manage growth in a sensible way and with the support of the community.

Headcorn is an important part of the Hospice community. We are eager to contribute to the success of the local area, and to identify ways in which local residents are also able to more easily access the Hospice's services.

Headcorn needs this plan approved

Headcorn needs to be influenced and managed by Headcorn as MBC do not seem to take

sufficient care of our parish.

I helped to develop it

I support the plan, however am concerned that it needs to be taken seriously by MBC this time otherwise the village will lose all character going forward.

I think it's important to make sure decisions affecting Headcorn's future are steered by those of us living here

I want adequate street lighting from the station through to North street! Coming home from work late it feels very unsafe in the pitch black

I want me and my family to be and feel SAFE

I would like to commend the Parish Council on a very comprehensive and well thought out plan.

I'm very keen to keep Headcorn Village a nice place to live

It gives a strong view as to how our village should develop. It is important that whilst development should take place it should be measured allowing acceptance by the community, and that infrastructure can support it.

It is important to retain our village identity

It's about time for everyone in the village as a community to come together. To look after each other and treat each other with respect.

Lived here 10 years seem whatever we object to gets the go ahead

Local people need to have a voice in the future of their community

sensible researched approach

Thank you for consulting Tunbridge Wells Borough Council (TWBC) on the above document. We note and support the Vision of the Headcorn Neighbourhood Plan, which is underpinned by six high level policy objectives. It is also recognised that no sites are being allocated in the Neighbourhood Plan. In preparing this response, TWBC has focused on aspects of the Neighbourhood Plan that could raise strategic cross-boundary issues, in particular by focusing on Section 8, Infrastructure Provision. It is noted that one of the aims of the NDP is to ensure that all existing and new infrastructure is robust and will support the needs of residents and businesses in the area. Criterion E of the Policy 4: Infrastructure Provision also sets out the priorities for infrastructure funding in Headcorn. These include improving a variety of infrastructure facilities, including health, education, open space and the public realm. These aspirations are recognised, and it is likely that this infrastructure may be used by some residents of Tunbridge Wells Borough who reside in the rural eastern part of the borough, including from settlements such as Frittenden, Cranbrook and Goudhurst. Likewise, it is assumed that some residents of Headcorn will utilise infrastructure within Tunbridge Wells Borough. It would be helpful to be kept updated with any of these projects as they progress and for discussions to be had with neighbouring infrastructure providers such as the NHS Kent and Medway ICB who have useful 'practice mapping' which may be helpful in discussions. Update on Tunbridge Wells Local Plan - The new Local Plan is currently subject to Examination. The Submission Local Plan (SLP) was submitted to the Secretary of State for examination by an independent Inspector on 1 November 2021 and was then subject to a number of

Examination in Public hearings which took place between 1 March and 15 July 2022. The Council received a letter setting out the Inspector's initial findings following the hearing sessions in early November 2022. In a letter the Council sent the Inspector, dated 17th February 2023, the Council set out an indicative timetable for the key stages in the Council's consideration of the Inspector's Initial Findings letter as well as a summary of the work being undertaken. This timetable was caveated on page 3 where it sets out that this was a provisional timetable, as it is dependent upon the implications of the outcomes of the suggested changes on matters including viability and housing supply for instance and is also subject to Members' consideration. Work to consider the initial findings is ongoing and recently the Council provided an update to the Inspector by letter dated 02 June 2023. Both these letters (along with other correspondence) have been published on the examination webpages of the Council's website. This will be updated further when we are able to do so. All correspondence is available on the Examination latest news and updates page. Given the above, TWBCs published timetable for adoption of the new Local Plan is delayed and the plan will not be adopted in early 2023 as set out in the current Local Plan timetable and the Councils Local development Scheme (LDS). The Council will update the Local Plan timetable and LDS in due course.

The village needs to plan ahead so we can keep our community supported

To give the residents support in local issues especially traveller problems

To restrict unnecessary new building until the infrastructure is in place to meet its needs.

We can't keep building without supporting childcare, medical, traffic etc

We moved to Headcorn as we thought it would be a pleasant peaceful village with a great community feel. However we have become increasingly concerned about the anti social behaviour in the village & also on kings oak park. We are now seriously considering moving away!

We need to have a more of a day with what happens in our village

We need to support each other and be kind . Help and understanding is key to a community

Would like more say in the life of the village housing transport childcare etc

#### **Comments from those partially supporting:**

Do not agree to more houses being built on our green spaces

Dont really understand what the plan entails

Feel there should be more focus or partnership between the parish council and existing (and future) developers.

I don't know enough about it. I would hope that it would help to support residents that wish to maintain the environment.

I don't know what Headcorn plan is?

I don't support any further development in Headcorn. If it has to happen I support a plan to manage any development for the good of the community.

I don't support and further developments in Headcorn as I believe it will harm the

community and infrastructure. If development has to happen it should be in keeping with the village and consideration given to the community.

I feel that Headcorn Parish council should still consider that the village is growing too quickly and in the light of the recent changes to the government's building policy Headcorn parish council should try to stop any further development before we lose our village status.

I mostly concur with the points made, but personally, I would challenge the proposed maximum cap of 30 houses per hectare. This upper limit, in my viewpoint, should be raised, and there are several reasons to back this up. One of the defining traits of Headcorn that makes it such an inviting place to live in is its walkability—the ability to get around on foot to various services, amenities, and attractions in the village. An increased density could enhance this as it allows for a more compact living area where facilities and services can be concentrated. A higher housing density means positioning more residences within a certain area, which could contribute to a more close-knit community. People living close to one another induces greater social interaction, which in turn creates a stronger sense of connectedness amongst residents. Moreover, this can also serve as an effective approach to managing urban growth and housing demands. By allowing for higher housing density, we could address housing shortage issues, providing more options for both current and prospective residents. This is an especially important consideration given today's escalating housing demands. However, it's also important to maintain a balance while increasing housing density. We should ensure that any such development is sustainable and doesn't overburden the existing infrastructure, strain local resources or compromise the unique village character of Headcorn.

I think there should be no more house building until the water companies can guarantee supply during summer months. In addition I think preserving green spaces is more important. The fields to the north of Lenham road where many dog walkers go every day should be preserved - it's a fantastic location to walk dogs, while also providing the inter connectivity for biodiversity with its hedges and streams/ditches. Also you need to make more provision for people to enjoy the countryside - more public rights of way should be created.

I want to see the natural world flourish. Too many new developments completely stifle any opportunities for wildlife. I also do not believe that putting one pond in, or claiming one small shrub outweighs the negative effects of developments. I want to see boundless environmental opportunities and sensible developments. When I lose water, I question the new developments' role in the loss. Likewise when I walk through an area with a lack of wildlife, I'll wonder if the new houses that flank my position are to blame.

It dodges the issue of land allocated for future housing and sadly recent developments in Headcorn somehow fall well short of the aspirations contained in the plan, notably of size and design

It doesn't full cover the community needs, it is missing wellbeing and recreation

Many of the issues covered are, understandably, centred on the village - rural properties have their own problems eg poor/no broadband, more prone to issues caused by flooding eg access to the village. No mention of water supply problems.



Much of the plan is in good order but a key element of the community and indeed any community is housing for those in the Autumn of life, over 60's. we are an ageing population and many want to move onto more appropriate housing, equipped for the future and / or providing the ability to be adapted as many homes are not. we believe the plan should take special heed of this sector, enable developments to be brought forward as surely those who have lived in a community have the right, are due the respect to be able to remain in the community they love and have supported over their life.

Need to see questions on survey before commit to strong support

Only 'small' developments of dwellings should be permitted.

Safety is getting worse, especially at night, so much traffic makes it unsafe at school times, parking is awful, so many vans and trucks parked on paths, greens, verges, not even pushchairs can get past, the whole area just seems like a industrial site

The Plan is very long so have not the time to read it all. Apologies if my questions have been answered in the plan

There is too much development and the infrastructure cannot cope with it.

**Comments from those not supporting:**

A waste of paper! Full of bunkum

I don't want any more development at all in headcorn. It doesn't need it. More development destroys the village setting and the environment for wildlife. More biodiversity and wild needs to be out into the south east not taken out.

No consideration has been given to: increase Headcorn surgery patient capacity (currently there is at least a six weeks waiting time to book a routine GP appointment). The road infrastructure will also not cope with more dwelling and more houses been built. Headcorn station is not accessible for people with reduced mobility, so addressing this should be more urgent than building new homes. Increasing water supply and avoiding water shortages should also be addressed before any new house is built. Finally, I don't agree with the plan of keeping the aerodrome as it is. It is a source of noise and pollution, so even if it's a tourist attraction I don't think its existence is justifiable in the current world we live in, especially when we should do everything we can to reduce CO2 emissions and noise pollution.

There is not enough in here about the lack of early year/nursery provision. Considering this has been such a major issue in the village, I don't understand why it does not have more attention.

waste of time, Headcorn is now a town ruined forever,I have lived here nearly 70 years

**A2.ii.b Comments on: HNP1 Design and Design Guidance**

Number of comments: 30

**Comments from those strongly supporting HNP1:**

All new houses should have solar panels

Design is paramount - Small development & local materials

I like the detailed examination of Headcorn's design with a focus on how it makes Headcorn Headcorn and the policy's desire to develop what it perceives to be good practice.

It would be great if the parish council could take more action to support residents on Kings Oak Park. As noted in the design plan, the green spaces on this development are not well thought out. Residents have found bag of rubble and these areas haven't been landscaped. They are not benefitting wildlife or local residents as they are not accessible. Furthermore, residents have to pay a substantial amount for ground's maintenance.

Its important that Headcorn not only remain a Village but should look like a Village as well.

Must be in keeping with the village architecture.

New buildings need to be able to fit and blend in with the rural and often much older buildings. New houses that look as if they could be in any new build estate in the centre of a town destroy the village look

Overbuilding without adequate facilities for example the doctors surgery ridiculously over subscribed impossible to get an appointment and far away from the town centre! Also no chemist at all in the town centre and the one at the doctors surgery has Nothing!!!

Overcrowding with dense properties which leads to too many traffic movements

Takes into account all aspects of Headcorn's history

The Design policy and guidance are the bedrock to ensure development is acceptable and support what is already there.

The design policy does not consider the mental wellbeing of the community and the importance of recreational facilities

The plan addresses previous unsuitable designs and focuses on design that is in keeping with the need to maintain a cohesive village environment.

The policy and design guidance gives practical examples of what works well to support the vision for Headcorn.

This isn't shown here but if helps local residents and the village doesn't grow to big without proper infrastructure and people being involved not just commuters

Whilst I do support the above policies it's almost laughable! The new developments are being ruined by the excessive number of social housing which seem to house drug addicts, ex offenders, drunks and people with no respect. How can this attract any decent hard working families!

#### **Comments from those partially supporting HNP1:**

Consider the design policy should support a more innovative approach

Do design include infrastructure/doctors/dentist etc?

I agree that anything built should be built to support what's already there and to match

the historical feel of headcorn but I don't agree that any more development should happen

I don't know enough about it, I would hope that it would support established residents with sympathetic designs/developments to enable family members (elderly parents and adult children) to remain in the community rather than the continuous building and expansion of estates that do not satisfy first time buyers

I would like to see smaller numbers of new properties, but the design guidance looks good. Spaces for parking is a must, and I do think slightly larger garden spaces should be insisted upon. Some of the new builds in Kings Oak Park are tiny and would not be able to support even a small tree in them.

It's just pushing property prices higher making it unachievable for anyone to afford apart from the well off

need to demonstrate support for accommodation aimed at those in later life wanting homes that are equipped or ready to adapt to the needs of those in the Autumn of life.

No one can monitor neighbours... Maidstone borough council set the standards with housing ... and will accommodate the vulnerable and homelessness ... there's for and against

The village doesn't need anymore developments

There are sash windows available now in plastic that look exactly in keeping with the traditional wooden sash windows that are far better at meeting EPC standards and much cheaper and do not detract from the village look and style

Unfortunately guidance can be easily overridden when the need suits the local authorities

**Comments from those not supporting HNP1:**

example: Forge Meadows parking is not all in the bays it is all over the pavements. Please use miles not kilometres. It is RAILWAY station not train station this is not America

No more houses

Why are you bothering?, there are NO Headcorn proper villagers on the parish council now, all clueless

***A2.ii.c Comments on: HNP2 Siting, landscaping and protecting the natural and historic environment and setting***

Number of comments: 28

**Comments from those strongly supporting HNP2:**

Avoid building in the flood plain

Concerns that these areas will be ruined by off road biking & other anti social behaviour.

Headcorn is a beautiful village let's not ruin it !!!

I feel it is important for Headcorn to maintain it's character and definitely for it to remain as

a village.

I like the history of Headcorn

If we are to keep the valued features of our village then this Policy must be adhered to.

It is essential to prevent any development that adds additional risk of flooding. It is also important to maintain and support wildlife in the village.

Keeping flooding issues at bay is of crucial importance to everyone and should never be an afterthought

Let's keep all the above and reject new buildings requests

New development should conform to the historic and ecological/rural nature of the Village and its surrounding areas.

No comment

Not just trees and hedgerows. I want to see swift boxes (lots per house), wild areas where wildflowers are encouraged, huge ponds, hedgehog holes, bat boxes and an infinite number of initiatives. I don't want to see a single hawthorn tree and a greedy developer or parish councillor who has received a backhander wiping their hands of the site once it has been built.

Our location in the low Weald needs protection our wildlife habitats and our farms are under threat

Please see comment on previous section

The green spaces around us are critical to our quality of life and must be managed accordingly

This is an ancient village whose history should be respected and added to.

Vital that environment is supported and not eroded in future.

Yes I agree wildlife and nature need to be protected. But again. They wouldn't need to be protected if you didn't build on them

### **Comments from those partially supporting HNP2:**

Again, I personally haven't seen plans. I believe I would agree but haven't seen anything. Maybe more posts on the community page need to be shown

Bit late really, so much has been destroyed already

I would argue that most of the land left to build on is subject to flood risk and therefore shouldn't be built on....

it sounds good but would need more information

No more development

See previous answer

The village sits in a rural setting but there is always a balance to be made and the need for specialist use of accommodation those in the Autumn of life, may mean a more sensitive approach to be made for these special uses of homes

### **Comments from those not supporting HNP2:**

Headcorn is gone forever

It looks a mess conserving stinging nettles!.. that is not keeping me my family safe .. I love wild life and flowers .. not weeds and hurtful nettles

To many messy areas, such as the 'wildlife' area in the new housing off Lenham Road

### **A2.ii.d Comments on: HNP3 Connectivity and access**

Number of comments: 18

#### **Comments from those strongly supporting HNP3:**

All new developments should have direct access to an arterial route if possible

Everyone should be able to feel safe!

Interesting re 'rat runs'. Traffic using Artisan Road to get to Grigg Lane from Lenham Road has increased considerably along with some cars using it as a race track

It is important to keep the core of Headcorn and future development must be close to and around the core.

Its vitally important that when placing development in the countryside and mostly rural areas that access and connectivity for the incomers is respectful of the environment and Village layout but that also there is enough road infrastructure and upkeep to cope with the increased traffic. Including pavements to allow people to walk to the shops and not drive there. especially as parking in Headcorn is already at a premium.

No comment

Not sure if it fits in this space but the water issues really need to be resolved before more houses can be built

Speeding is a problem in Headcorn and access for connecting new roads needs to be carefully planned.

#### **Comments from those partially supporting HNP3:**

Any developments should be safe and well connected but I don't agree there needs to be anymore developments. As then it will be the town of headcorn not the village of headcorn

How to stop developments looking like car parks, then those parked cars over flow to other roads

More access to the countryside should be considered by creating new public rights of way.

needs to protect what is already here from long ago

Vehicle speed in the village should be 20 mph. Speed matrix sign on Lenham Road.

### **Comments from those not supporting HNP3:**

No more development

No more development

The developments have caused Forge Lane and Oak Lane to become the Headcorn bypass so they avoid the traffic lights, come and do a traffic survey outside my house!

We should not be having any more developments at all!

What do you mean??

### **A2.ii.e Comments on: HNP4 Infrastructure**

Number of comments: 41

#### **Comments from those strongly supporting HNP4:**

A minority park in a selfish and dangerous manner, the provision for parking is good. Drainage and relayed matters remain an issue, I assume by a level of neglect on the part of the water companies. The junction at Kings Road and Moat Road could do with speed restrictions and cameras or traffic calming measures particularly as there is a school in Kings Road.

Although not relevant for me, there doesn't seem to be any provision at all for nursery school

Any further development in Headcorn will stretch the existing infrastructure to its limits. This particularly so with water supply, primary school, existing roads, nursery school, parking and flood defences.

Any new developments should come with appropriate accommodating infrastructure. The high street in Headcorn is already a busy area difficult to pass through

Community infrastructure is more than the ten specific types listed - what is limiting the types to 10 and why does it not include broader healthcare access, crime reduction or recreational facilities?

Commuter parking is a problem and on main 274 with no parking is no choice but worse is from Blackhorse who have 2 spaces but because their neighbours complain they park huge works van in our road. Also there is someone with disability badge who parks dangerously right at end of road

Developers have run rough shod over the village promises of footpaths and nursery have been reneged on

Development should be put on hold until the capacity of services catches up

Headcorn is expanding .. this will not change.. infrastructure will need to change

Headcorn is struggling as it is to cope with the number of residents as it is.

I force parking, make Headcorn high street a 20 MPH speed limit

It is vital electricity, sewage, water medical services do not fail, they have in this millennium. Do not think MBC can be relied upon to ensure infrastructure is upgraded as part of

expansion and development. This has been to detriment of village in order to satisfy party political directives. All development should be above national or local politics. Hence objective bNeighbourhood Plan must be part of the Planning Legislation to ensure Developers put community before and over profits. What gets built is here forever and we already have some recognised as bad development. Needs to be stopped.

Maybe we should STOP the ridiculously large lorries thundering through the village serving NO PURPOSE whatsoever, NOT passing traffic for local shops so that argument is utterly ridiculous. Make sure South East water can supply a constant supply not completely cutting hundreds of houses off for long periods of time! We NEED adequate street lighting! Right now past midnight there is ZERO

Need to incorporate better supply of water especially with new housing developments.develo

Someone needs to have an idea of this, the council clearly has no clue so a plan in infrastructure provision would be really helpful.

Sorry I put about water in the previous answer by accident. We also need better childcare provisions for children under 5. We desperately need a nursery. I spend one hour of my day driving my daughter to/from nursery, on top of working full time and commuting to London which is v stressful

The various utilities in the Village especially water and broadband need constant expansion of their networks to cope with the increased population of the Village already that is without adding further development. We already experience water shortages in this region every summer. Then there is parking that is at a premium and the inevitability of incomers having children that will need places in education when none exist as the school is already at max capacity.

These matters have not been addressed with previous developments

This. This should be a concern without building any more houses. I don't think the infrastructure is in place for the houses you've already built. Don't lay another brick without going back and creating new infrastructure.

Utilities, particularly the water companies as currently they can't cope!

We definitely need more childcare settings

Will help to maintain what the village has

Yes any developments need to have infrastructure support. But how will new housing help? The dentist in the village isn't taking on NHS, and the doctor is already over run. How will adding housing help to this?

Yes, we agree that this is a priority. Improvements to broadband in particular are important for our work, and the importance of parking which is easily accessible and affordable is also a key factor for the Hospice.

#### **Comments from those partially supporting HNP4:**

Broad bans is good. Sewerage a potential danger at present. There is a need for good primary education, in order to give our children access to Kent's highly rated GramSchools

and in particular those children whose parents cannot afford expensive tutoring or to send their children to fee-paying preparatory schools to achieve this. fro

Headcorn development is expanding a faster rate than infrastructure can support

I think this could be strengthened- speed is a big issue on the A274 and the pavement very narrow and parking provision very poor. Also the industrial development beyond the Village boundary- going towards Sutton Valance from Headcorn is an eyesore- with Large brightly coloured signage visible from the village. This does not sit well with the focus on appropriate development throughout this proposal

I would like to see an additional doctors surgery in the village or expansion of the existing surgery that is currently unable to cope with the demand. All other doctors are too far away and will not allow you to join. I would also like to see some addition of fitness clubs in Headcorn, either encouraging a business to set up a gym or fitness centre, or using the village facilities for more fitness classes. Finally I would like to see more funding for social activities designed for younger/mid aged men in the village.

It's not just the high street, side roads where people live need to be included, we are putting up with so much rubbish

Missing Medical support, which is now at breaking point. Consideration should also be mentioned of WATER SUPPLY

More needs to be done about parking in Headcorn. There is a big empty car park behind Sainsbury's that never looks full. We rarely shop in Headcorn because the parking is so difficult. If I can walk then I do but on days when I can't carry everything I don't bother parking in Headcorn as there's not enough spaces and it's not right that residents have to pay. It's a shame because we would rather shop locally.

need to be aware that the older residents dont suffer because of looking out for new ones.

See previous comment about water company ensuring water supply is guaranteed before allowing new developments of whatever size.

There are some excellent aspirations in the plan and it is clear what the residents would prefer. Sadly the council have failed to deliver on most of the major perceived shortfalls. This in turn questions the value of the plan. Great in concept poor in execution .

Water supply issues with more housing.

Would include improvements to local sports facilities

#### **Comments from those not supporting HNP4:**

New developments are always built with less parking than needed, I live in one of them and developers could care less about parking as they were (and will always be) only interested in maximising dwelling areas.

No safe cycling routes or signage in the village. 20mph limit in the village please. Create one way system in pays off the village to make prevents wider for pedestrians, buggies and wheelchairs

Please talk in English and not gobbledegook

School and Doctors full, water leaks everywhere, water shortages



There are not enough facilities in Headcorn! You can get a doctor's appointment, send you child to nursery, your child to holiday club ect

**A2.ii.f Comments on: HNP5 New dwellings (and same policies applying to everyone)**

Number of comments: 34

**Comments from those strongly supporting HNP5:**

Although I believe anyone should be able to live in the village, with regard to social housing Borough and county councils MUST look carefully when placing tenants as moving families from urban to a rural setting can cause enormous problems.

Gypsy and traveller sites are a problem in Headcorn, such sites should be spread evenly across the county and not be allowed to increase in one area. Many of the resident of these sites are considerate members of the community but others abuse the local facilities such as Days Green to the detriment of local people.

I believe the traveller and gypsy community is an important part of Headcorn, has been for many years. However, I really like the highlighting of damage to environment by self-regulated housing developments and the desire to make official process apply to all.

I don't want to stop people living in Headcorn but it needs t be managed lest it becomes an awful places of sprawl to live like a lot of the developments up towards Maidstone

I support whatever helps us minimise any expansion to the village and any type of dwellings. Particular concern is the high number of travellers and the negative impact on the Village

It is fair and considerate to apply the same rules for all citizens in the parish

Its only fair that everyone abide by the same rule set. Not have some segments of the community unfairly penalised because they don't live in a caravan when it comes to planning decisions.

Many of the current gypsy dwellings are not properly regulated or infringements enforced

Start treating the travellers the same as everyone else.

The allowance of gypsy and traveller development without considering its effect on the settled community is of great concern. This might be a locan failure and failure of weak Government policy. Its impact on the settled community must be taken into consideration. The percentage of social housing in any new development must change as there is insufficient infrastructure to support it, including remoteness to larger towns and lack of good reasonably priced public transport.

Yes, but nothing is ever done about THEM

**Comments from those partially supporting HNP5:**

1. With limitations on the size of developments, how would you address each individual developments impact on local infrastructure, and also therefore what financial contribution should be allocated from developers?
2. The Conservation area should be expanded to areas to protect the boundary of the village. An example being the land immediately to the

west of Gooseneck Lane. This area is adjacent to a listed property and yet is not protected in the same way. A previous owner of Headcorn Manor attempted (on sale of the Manor) to separately retain an area of the land for future development (and this area is still separately fenced off). There are similar elements of land immediately adjacent to the Conservation Area, which need similar protection. Micro developments are likely to be submitted for approval in the period of this plan and therefore I propose the Conservation Area also be reviewed as part of this Neighbourhood Plan.

25 is still far too many for a single development. If projects of 25 homes keep being added to the edges of the village, it will expand, making the provision of 2 homes in the countryside useless.

Affordable housing is only affordable to the first purchaser, after that it's on the open market so the price is higher. It doesn't work.

Build sensible away from the village

Consider the development is too lenient to urban development. More focus should be on rural development

general new housing should be viewed differently from housing specifically aimed at those in Autumn of life.

I disagree with giving more homes to affordable housing, I live on Kings Oak Park and unfortunately we have had way too many anti social behaviour issues with these types of housing. Many residents include people just out of prison etc who have no intention of turning their lives around. There are also known issues with the gypsy community and theft in Sainsburys

I don't want anymore developments, but they if they if they are built they should be small and affordable, social housing is a must. Village living shouldn't be for only for the lucky privileged

I think Headcorn has too many traveller sites already.

If the travellers in the area didn't take the attitude that they can do what they want, where they want, regardless of the rules most of us follow, and not drive their vehicles at high speeds, then my answer may be different. Placing housing association properties in the middle of a housing development is all very well if the tenants actually look after them!

Number of dwellings should be no more than 15

rules have been too lenient for travellers so this sounds fair same rules for everyone

The aspiration to have developments of no more than 25 seems to have failed in recent times. How the current traveller sites have survived behind massive high fences and occupational density is beyond me. Within Headcorn itself the inability to match school provision, water supply and drainage is folk law.

There are too many traveller sites in the village and they will not take any notice of policy's and will continue to grow and terrorise the village, this and no more housing is the top policy we need!

Travellers have a rule of their own. They would not like to be told what they can & can't do.

We already have enough socially and economically challenging people in the village, mainly

in the cheaper houses and rental properties. If you build cheaper homes, you risk encouraging chavs and the associated problems they bring.

We have a long history of settled and housed travellers in this village, an established and valued part of our community. Let us work to ensure that this integration and respect is maintained.

**Comments from those not supporting HNP5:**

Headcorn parish and KCC fail to support the infrastructure for existing population. The road condition has for many years been a disgrace. Parking is never monitored and is regularly illegal and dangerous without any regulation. There should be zero new builds until existing population can be effectively supported. Deal with those who build without approval more swiftly and harshly instead of shying away from dealing with 'travelling community' setting up static caravans and houses without permission

No more development

Travellers are not welcome in our village.

We have over reached our quota for travelers sites

What??!!

**A2.ii.g Comments on: HNP6 The Economy**

Number of comments: 15

**Comments from those strongly supporting HNP6:**

Argument against warehouse/ retail development is good.

It is important in the modern age that people should work where they live to cut down on travel and emissions in a bid to reduce the effects of climate change.

It is important that any new commercial development supports local employment.

It would be great to have another restaurant option in Headcorn

No comment

The correct type of development can benefit the high street traders

The High Street is an essential and valuable part of the village. Bringing employment opportunities to the area is essential for young people.

The only caveat I would add to this is it would be nice to have a few more shops in the village centre - a fishmonger, greengrocer (I'm not counting Sainsbury in that, I want a fishmonger and grocer that could supply local produce). Also (and this is personal preference) maybe a slightly higher end pub/restaurant.

**Comments from those partially supporting HNP6:**

?

I think we could use some of the space around Headcorn for larger business that would

support the community, where there is no current provision, for example gym facilities.

to a degree but also business needs to drive itself

We need to realistic about the need for renewable energy provision-

**Comments from those not supporting HNP6:**

Dont shop here anymore to limited and expensive and downright tacky especially the vape shop sign in Hubbles shop

No longer shop here, it is chav-ville to many gypos

Post pandemic, work has changed for many, there are now significant numbers of residents in the parish that now work from their home offices for a considerable proportion of the working week. Understanding their needs and giving support to them as well as enabling them to support the local community more is a key component missing in the Headcorn Community Plan

**A2.iii Responses from those not using the 2023 Regulation 14 Survey**

**7.8** Although the vast majority of respondents to Headcorn's 2023 Regulation 14 Consultation responded using the online survey, eight organisations replied by letter of email. These responses (redacted to remove names and individuals' contact details) are set out below.

## **A2.iii.a Response from Maidstone Borough Council**

To: Headcorn Parish Council

Date: 14<sup>th</sup> August 2023

By email only

Dear Sir/Madam

### **HEADCORN NEIGHBOURHOOD PLAN AUGUST 2023**

#### **Consultation pursuant to Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 (as amended)**

**Consultation period Thursday 22 June 2023 to Monday 14 August 2023**

Thank you for consulting Maidstone Borough Council on the pre-submission draft of the Headcorn Neighbourhood Plan (Regulation 14). In addition to the points made within this letter, the Borough Council has provided further, detailed representations. These are attached to this letter (appendix 1) and, for ease of reference, the comments are set out in the order of the plan.

The amount of work that has gone into producing the neighbourhood plan is clear and, overall, the majority of the Council's comments address the need for clarity or correction of supporting text and/or policies. In summary, there needs to be a clearer distinction between policies and text; certain policies are too restrictive and are not sufficiently positive or flexible.

#### **Conformity with adopted Local Plan:**

The analysis of the adopted development plan policies above illustrates that the pre-submission draft of the Headcorn Parish Neighbourhood Plan (Regulation 14) is not in general conformity with the strategic policies of the adopted Local Plan in relation to Policies: HNP 1, HNP 2, HNP 4, HNP 5 & HNP 6.

#### **Strategic Environmental Assessment and Habitats Regulations Assessment:**

Just to repeat the results of Maidstone Borough Councils SEA and HRA Screening opinion on the Regulation 14 draft Headcorn Neighbourhood Plan set out that the Plan is not likely to have a significant effect on the environment or on a European site. Therefore, it is not considered that a Strategic Environmental Assessment or a Habitats Regulations Assessment would be required.

This result is subject to the formal responses from the statutory consultees (Environment Agency, Natural England and Historic England) which are due by 10<sup>th</sup> August. The Council will confirm the status of the screening report with Headcorn Parish Council after this date.

### **Maidstone Borough Council**

Maidstone House,  
King Street,  
Maidstone, Kent ME15 6JQ

 [maidstone.gov.uk](http://maidstone.gov.uk)

 [maidstonebc](https://twitter.com/maidstonebc)

 [maidstoneboroughcouncil](https://www.facebook.com/maidstoneboroughcouncil)



---

It is also important to remember that if the Neighbourhood Plan is amended at future stages in the process, then an updated screening will need to be undertaken to determine whether an SEA or HRA will be required.

**National Planning Policy Framework:**

The Council would also like to point out that as prescribed in national guidance and regulations a Neighbourhood Development Plan should also be in general conformity with national planning policy as set out in the National Planning Policy Framework (2021).

**Conformity with emerging Local Plan:**

Whilst it is not an absolute requirement for a Neighbourhood Development Plan to be in conformity with an emerging plan, it is nonetheless clear that the emerging strategic policies and priorities, and importantly the substantial evidence which underpin them, are relevant to Neighbourhood Development Plans. Especially as the Maidstone Local Plan Review (MLPR) is at an advanced stage of examination with the potential for adoption of the MLPR prior to the examination and adoption of the proposed Headcorn Neighbourhood Development Plan as set out in the Regulation 14 Consultation document.

Upon review Headcorn Parish Council should be aware that, there is potential conflict between the Neighbourhood Development Plan and the emerging Local Plan. It may be useful to note the following MLPR policies in relation to the proposed Headcorn Neighbourhood Development Plan

- Policy LPRSP6 Rural Service Centres in relation to Policy HNP 5 New Dwellings
- Policy LPRSP6(D) Headcorn Policy criteria 5 in relation to Policy HNP 4 Infrastructure Provision
- Policy LPRSP9 Countryside in relation to Policy HNP 2 Siting, landscaping and protecting the natural and historic environment and setting criteria 14 and 15 and Policy HNP 5 New Dwellings criteria I.3 and II.6
- Policy LPRSP10(A) Housing Mix in relation to Policy HNP 5 New Dwellings criteria: II.1, II.2 II.5
- Policy LPRSP10(B) Affordable Housing in relation to Policy HNP 5 New Dwellings criteria II.5
- LPRSP11 Economic Development in relation to Policy HNP 6 The Economy
- LPRSP11(A) Safeguarding Existing Employment Sites and Premises in relation to Policy HNP 6 The Economy there is no mention of safeguarding of the existing identified employment sites in the Parish and the Council feels this should be included.
- LPRSP12 Sustainable Transport in relation to Policy HNP 3 Connectivity and Access
- LPRSP13 Infrastructure Delivery in relation to Policy HNP 4 Infrastructure Provision criteria E
- LPRSP14(A) Natural Environment in relation to Policy HNP 2 Siting, landscaping and protecting the natural and historic environment and setting
- LPRSP14(B) The Historic Environment in relation to Policy HNP 2 Siting, landscaping and protecting the natural and historic environment and setting criteria 1

- 
- LPRSP14(C) Climate Change in relation to Policy HNP 2 Siting, landscaping and protecting the natural and historic environment and setting criteria 11 and Policy HNP1 Design Policy for Headcorn
  - LPRSP15 Principles of Good Design in relation to Policy HNP1 Design Policy for Headcorn and Policy HNP5 New Dwellings

The MLPR document is available on the Council's website via the link below.

[LPRSUB 001 Local Plan Review - Regulation 19.pdf - Google Drive](#)

Please note that the MLPR has been subject to change during the course of the examination process and these changes referred to as 'main modifications' are being confirmed with the Planning Inspector who is examining the MLPR and will potentially be consulted on in the near future.

Maidstone Borough Council hope these comments are helpful and are happy to offer a meeting with representatives of the Neighbourhood Plan Group to discuss any issues that may arise from the Council's representation. Please contact our Neighbourhood Planning team at [NeighbourhoodPlanning@Maidstone.gov.uk](mailto:NeighbourhoodPlanning@Maidstone.gov.uk) should you wish to discuss any of these matters further.

Yours faithfully,



Head of Spatial Planning & Economic Development  
Maidstone Borough Council

**Headcorn Neighbourhood Plan  
Regulation 14 Consultation 22 June to 14 August 2023  
Maidstone Borough Council Representation**

Page No.	Policy or Paragraph No.	Representation
		Note: Suggested text additions are <b>emboldened</b> , and deleted text in <del>strike</del> through
9	1.8	Need to include the need for an area designation as well into this paragraph
10	1.9	Basic conditions are missing from the list as outlined in NPPF. Below conditions should be incorporated: <ul style="list-style-type: none"> <li>• having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.</li> <li>• having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.</li> <li>• prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</li> </ul>
10	1.13	Wording should read Community Infrastructure <del>Levey</del> <b>Levy</b> .
	1.17	Is it ok to apply the same rules for G+T?
12	1.18	<i>The period covered by Headcorn's Neighbourhood Plan runs from 2022 to 2038. This matches the plan period in Maidstone's proposed revised Local Plan, which was submitted for its Regulation 19 Consultation in October 2021.</i> <ul style="list-style-type: none"> <li>• If the Neighbourhood Plan wishes to coincide with the LPR, timetable will need to change to include 2021 – 2038.</li> <li>• Would it be better to say submitted for Examination in March 2022 rather than Regulation 19.</li> </ul>
19	2.10	Is this paragraph needed?

Page 1 of 5

**Headcorn Neighbourhood Plan  
Regulation 14 Consultation 22 June to 14 August 2023  
Maidstone Borough Council Representation**

Page No.	Policy or Paragraph No.	Representation
		Note: Suggested text additions are <b>emboldened</b> , and deleted text in <del>strike</del> through
	General	Do we need to know breakdown from resident survey results?
28	4.4	The aim of this Design Policy, together with the accompanying Design Guidance, as well as of Headcorn's Neighbourhood Plan as a whole, is to ensure that new development will have a similarly positive impact throughout the Parish.
30	5.4	Headcorn is <del>an</del> a historic village.
54	5.60 to 5.61	Does the external lighting description need to be strengthened to align with LP17 DM8? – Not detrimental to immediate setting and site needs to demonstrate the amount of lighting necessary
29	HNP Policy 1	<ul style="list-style-type: none"> <li>• Not in conformity with LP 2011-31 Policy DM4 criteria 1 as it does not allow for the enhancement of a heritage asset.</li> </ul>
30	Whole of chapter 5	HNP Policy 1 comes before the policy justification in chapter 5, but other policies it comes afterwards. Should it be moved for consistency. The numbering system may need to be changed to match the policy numbering.
77	6.25	It is important that development recognises the need to preserved older trees, especially the oak as these are also very important wildlife refuges.
79	6.36	The presence of these rivers brings benefits to the Parish
83	6.41	The statement: ' <b>6.41</b> <i>In line with the National Planning Policy Framework, in general development in the countryside in Headcorn should not be allowed</i> ' is not consistent with the NPPF. Paragraph 80 of the NPPF does allow for development in the countryside in some circumstances.
84	HNP Policy 2	<ul style="list-style-type: none"> <li>• Part 11 of the policy is not in conformity with LP 2011-31 Policy H1 Housing Site Allocations criteria 1(ii) flood risk. The proposed policy seeks to stop any development in flood zones, where as the adopted policies of the Local Plan allow for development in these locations with mitigations. Therefore the policy should be amended to reflect that development is allowed with suitable mitigations as a last resort.</li> </ul>

Page 2 of 5



**Headcorn Neighbourhood Plan  
Regulation 14 Consultation 22 June to 14 August 2023  
Maidstone Borough Council Representation**

Page No.	Policy or Paragraph No.	Representation
		Note: Suggested text additions are <b>emboldened</b> , and deleted text in <del>strike through</del>
		<ul style="list-style-type: none"> <li>Part 11 It may be worth being more specific with areas rather than in the policy saying development will not be permitted in areas where Headcorn Parish is aware of recent flood events and identifying these areas.</li> <li>Part 3 of the policy is not in conformity with wording in LP 2011-31 Policy OS1. The identified open spaces in Headcorn in Policy OS1 (10 &amp; 11) are not referred to in policy HNP 2 and so not protected. Therefore these allocations should be referenced in the policy in order for them to be protected.</li> <li>Part 3 is not in conformity with wording in NPPF paragraph 99</li> </ul>
84	HNP Policy 2	<ul style="list-style-type: none"> <li>Criteria 2 perhaps for added clarity the views proposed in HNP Map 12 should be included in the policy itself.</li> </ul>
84	HNP Policy 2	<ul style="list-style-type: none"> <li>Part 6 will deliver a biodiversity net gain, in line with national and local targets, that is focused on supporting native flora and fauna</li> </ul>
87	7.2	<ul style="list-style-type: none"> <li>for example, for road safety; will reflect desired development patterns by, for example, avoiding the <del>creation</del><b>ing</b> of ribbon development or rat runs</li> </ul>
93	8.6	<ul style="list-style-type: none"> <li>The results from the 2021 Residents' Survey represent a slight improvement compared <del>to</del><b>to</b> the results from the 2013 Residents' Survey</li> </ul>
100	HNP Policy 4	<ul style="list-style-type: none"> <li>Part A 1. Is not in conformity with LP 2011-32 DM23 parking standards as this states that there should be a parking allocation of 1.5 spaces.</li> <li>Part E (I) is not in conformity with LP 2011-31 Policy ID1 criteria 4 infrastructure priorities. Criteria (E) as drafted has a very different prioritisation for infrastructure provision to that in the Local Plan policy ID1. NPPG allows a NP to make provision for infrastructure prioritisation<sup>1</sup> <i>"Plans should be prepared positively, in a way that is aspirational but deliverable. Strategic policies in the local plan or spatial development strategy should set out the contributions expected from development. This should include the levels and types of affordable housing required, along with other infrastructure. <u>Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on</u></i></li> </ul>

<sup>1</sup> Paragraph: 005 Reference ID: 41-005-20190509

**Headcorn Neighbourhood Plan  
Regulation 14 Consultation 22 June to 14 August 2023  
Maidstone Borough Council Representation**

Page No.	Policy or Paragraph No.	Representation
		Note: Suggested text additions are <b>emboldened</b> , and deleted text in <del>strike through</del>
		<p><u><i>development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy...."</i></u></p> <ul style="list-style-type: none"> <li>It is relevant that Maidstone is a CIL Charging Authority and that in general development will provide for infrastructure through CIL receipts rather than planning obligations secured under s106 TCPA. Equally a NDP should not duplicate policies that are included in the Local Plan, but rather they should add to and supplement those strategic policies.</li> <li>It will be for the LPA through its adopted governance procedures etc to address the distribution of CIL receipts and the allocation of these to infrastructure projects. We would suggest that if the NDP is to make reference to priorities for spending it should instead be focussed on the neighbourhood portion under Regulation 59A of the Community Infrastructure Levy Regulations 2011 as amended.</li> <li>It is our view that the policy as drafted is not in general conformity with the strategic policy in the Local Plan 2011-2031 in that it appears to refer to all CIL receipts from development, but this could potentially be remedied by some drafting changes to set out that the prioritisation relates to the spending of the neighbourhood portion of CIL.</li> </ul>
106	9.10	<ul style="list-style-type: none"> <li>Setting a maximum size of self-build schemes is not in conformity with SP19 – the Council will not set specific targets due to inflexibility.</li> </ul>
116	HNP Policy 5	<ul style="list-style-type: none"> <li>Part IV of the policy is not in conformity with LP 2011-31 Policy SP17 criteria (1&amp;7). Policy SP17 of the adopted Local Plan allows for some flexibility of development in the countryside away from the settlement boundaries and so part IV of Policy HNP 5 should allow for this.</li> <li>Part I.2 of the policy is not in conformity with LP 2011-31 Policy SP19 criteria (2)</li> <li>Part II.5 of the policy is not in conformity with LP 2011-31 Policy SP20 criterion (3 [i] &amp; [ii]). The proposed favour for affordable purchased housing is not in line with the</li> </ul>

**Headcorn Neighbourhood Plan  
Regulation 14 Consultation 22 June to 14 August 2023  
Maidstone Borough Council Representation**

<b>Page No.</b>	<b>Policy or Paragraph No.</b>	<b>Representation</b>
		<p>Note: Suggested text additions are <b>emboldened</b>, and deleted text in <del>strikethrough</del></p> <p>adopted policy in the Local Plan that favours affordable rented accommodation over intermediated housing with a 70:30 ratio. The policy should be amended to reflect that.</p> <ul style="list-style-type: none"> <li>Part II.5 of the policy is not in conformity with LP 2011-31 Policy H1 criteria (iv) which reiterates the criteria in Policy SP20.</li> </ul>
126	HNP Policy 6	<ul style="list-style-type: none"> <li>Parts 1-5 of the policy is not in conformity with LP 2011-31 Policy SP22 criteria (1). Policy SP22 sets out the Council's economic development strategy for the Borough and the proposed Policy HNP 6 does not support this through the safeguarding on existing employment sites, a criteria should be added to enable this.</li> <li>May want to define 'business development' in within the reasoned justification to the policy and use <b>planning terminology</b>, for example the use class order.</li> </ul>

## A2.iii.b Response from Kent County Council



### Growth and Communities

Invicta House  
County Hall  
Maidstone  
Kent  
ME14 1XX

Phone: [REDACTED]

Ask for: [REDACTED]

Email: [REDACTED]

14 August 2023

Clerk, Stefan Christodoulou  
Headcorn Parish Council  
The Parish Office  
Headcorn Village Hall  
Church Lane  
Headcorn  
Ashford  
Kent  
TN27 9NR

### BY EMAIL ONLY

Dear Stefan,

### Re: Headcorn Parish Neighbourhood Plan (2022-2038) - Regulation 14 Consultation

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

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

### 2. Setting the Scene – Headcorn Parish

Public Rights of Way (PRoW): In respect of paragraph 2.1, the County Council is disappointed with the omission of the PRoW network and its important place in the landscape of the parish. Significant visual connectivity is provided by the PRoW network and it is requested that the importance of this asset is specifically referenced.

#### *2.ii The history of Headcorn*

Heritage Conservation: Although there are few archaeological discoveries from Headcorn dating earlier than the medieval period, such discoveries are not unknown. Several prehistoric artefacts, in the form of stone or bronze axes and axe heads, and iron age coins, have been found in the parish. In addition, a mid to late bronze age vessel in a pit was discovered at Ulcombe Road in 2018 together with late iron age and Roman features, and a late iron age / Roman farmstead may have been found at Little New House Farm.

kent.gov.uk

Many of these discoveries, together with a wider review of the heritage and potential of Headcorn village, can be found in a [historic town survey](#) prepared by the County Council. It is recommended that the findings of this survey are reflected within the draft Neighbourhood Plan.

The draft Neighbourhood Plan then reviews the built environment of the village, however, it should be noted that all these sites, as well as others now lost, will have left an archaeological heritage that could be revealed either by research or during development. This archaeological heritage is also part of the wider heritage of the Neighbourhood Plan area, and should therefore be referenced in the document.

#### *2.ii.a The history of the built environment*

Heritage Conservation: The County Council recognises that the text only partially reviews Headcorn's built environment. Although some key heritage assets in the village centre are identified, there are many others that deserve mention. There are at least five medieval moated sites listed in the [Historic Environment Record](#), including the important site of Moatenden Priory. These sites are characteristic of the Low Weald and many of the issues of setting and conservation identified in the draft Neighbourhood Plan apply to them. It would be helpful to see these identified within the Neighbourhood Plan as a site type of particular interest for the local community and worthy of conservation. There are also approximately 70 historic farmsteads (identified as present on the 2<sup>nd</sup> edition Ordnance Survey map 1897-1900), which should also be mentioned in the document.

### **3. Vision For Headcorn's Neighbourhood Plan**

PRoW: As a general statement, the County Council, in respect of PRoW, is keen to ensure that its interests are represented within the local policy frameworks of the parishes in Kent. The County Council is committed to working in partnership with parish councils to achieve the aims contained within its [Rights of Way Improvement Plan](#) (ROWIP). This aims to provide a high-quality PRoW network, which will support the Kent economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent a great place to live, work and visit.

The County Council is disappointed with the omission of the PRoW network within the draft Neighbourhood Plan, due to the benefits and opportunities the network offers. Headcorn Parish Council is strongly urged to reference the ROWIP within the draft Neighbourhood Plan as this will enable successful partnership working to continue and deliver improvements to the PRoW network in Headcorn. Joint delivery of the ROWIP will ensure significant benefits and potentially provide access to additional funding opportunities.

The County Council strongly advises the inclusion of the PRoW network within Objectives three, four and five, as it provides important access and connectivity. It also reflects the extent to which the PRoW network meets the likely future public need in contributing towards more sustainable development. It is also recommended that policies HNP Policy 3: Connectivity and Access and NHP Policy 4: Infrastructure Provision include reference to the PRoW network.

---

3.i.a *Creating policy objectives to support the Vision*

PRoW: It is advised that the Objectives of this draft Neighbourhood Plan have specific reference to the PRoW network and the role of the ROWIP. The PRoW network is a valuable resource that provides significant opportunities in respect of health and well-being, tourism and sustainable transport. The ROWIP can help contribute towards a robust infrastructure that enables development and encourages economic growth.

**5. Headcorn Design Guidance**

5.v *Street scape – maintaining Headcorn's sense of place*

Highways and Transportation: The County Council, as Local Highway Authority, notes that the design of new roads, including the width, layout, materials and street furniture, will need to achieve conformity with the adopted Kent Design Guide (2005). This will ensure that they are suitable for adoption by the County Council as publicly maintainable highway.

5.vi.a *Parking*

Highways and Transportation: The County Council recommends that the guidance in this section draws attention to the need for development layouts to accommodate the parking needs of cyclists, motorcyclists and the mobility impaired, as part of the overall parking provision.

*HNP Policy 3: Connectivity and access*

Highways and Transportation: The requirement for self-contained development in criterion 5 appears to conflict with the emphasis placed on connectivity in criterion 1. The County Council recommends that the policy encourages layouts that create permeable neighbourhoods to minimise walking/cycling distances. This policy should also emphasise the importance of achieving direct and convenient access to public transport services, to allow sustainable transport use by residents and visitors.

In respect of criterion 7, it should be noted that the vehicular access arrangements for new development should achieve conformity with the adopted Kent Design Guide (2005).

*HNP Policy 4: Infrastructure provision*

Highways and Transportation: The residential parking standards quoted in criterion A(1) should be modified to align with the County Council's adopted standards contained in [Interim Guidance Note 3](#) (2008) of the Kent Design Guide (2005).

The County Council recommends that this policy requires cycle parking provision in accordance with the County Council's adopted standards in [Supplementary Planning Guidance 4](#) (2006). Transport should also be included as a spending priority for commercial / community developments.

## **6. Siting, Landscaping and Protecting the Natural and Historic Environment and Setting**

### *6.ii Views*

**PRoW:** The County Council recognises that reference has been made to the Greensand Way promoted route, however, there is no other PRoW included in this paragraph, or on HNP Map 12. It is therefore recommended that these are revised. Views from PRoW require protecting from the impacts of future development and should therefore be included within the draft Neighbourhood Plan to future proof the network.

### *6.iii Green spaces*

**PRoW:** The County Council advises that the draft Neighbourhood Plan should aim to increase the provision of accessible green spaces and improve opportunities to access this resource. Good public transport and active travel links with open spaces should be made available, so that the public are not dependent on private vehicle use for visiting these sites.

### *6.v Development in the countryside*

**PRoW:** The County Council recommends inclusion of the following sentence within this section:

***"In areas where there would be significant effect on PRoW, the network must also be included in the landscape planning of the infrastructure as a whole".***

Where PRoW would be directly affected by development proposals, plans should clarify intentions for positively accommodating, diverting, or enhancing paths. The draft Neighbourhood Plan should also seek to ensure that proposals do not adversely affect the existing PRoW network or National Trail. It is requested that additional text is inserted into policy wording, stipulating that applicants for new developments engage with the County Council in regard to public rights of way at the earliest opportunity. This would allow the County Council to review proposals for access improvements and consider appropriate developer contributions for PRoW network enhancements.

**Heritage Conservation:** It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets, and among farm buildings, would, in many places, be consistent with the historic character of those areas. English Heritage, the County Council and Kent Downs Area of Outstanding Natural Beauty have [published guidance](#) on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. It is advised that this is taken into consideration in the development of the Neighbourhood Plan.

*HNP Policy 2: Siting, landscaping and protecting the natural and historic environment and setting.*

**Biodiversity:** The County Council notes that the results of ecological surveys should inform development design and landscaping.

The County Council recognises that the draft Neighbourhood Plan is encouraging off-site Biodiversity Net Gain to be located within Headcorn Parish. However, this may not be possible, as Biodiversity Net Gain will be restricted to where habitat creation / enhancement can be carried out. While it is important to ensure that there is no overall loss of biodiversity locally, it is worth noting that a strategic approach to habitat creation / enhancement through off site provision may be more beneficial to biodiversity.

## **7. Connectivity and Access**

### *HNP Policy 3: Connectivity and access*

**PRoW:** The County Council is disappointed with the omission of the PRoW network in this policy. This policy should reflect the County Council ROWIP policy to improve and upgrade the PRoW network where it links with amenities, public transport modes, work and education to increase the attractiveness of walking, cycling and riding as an alternative to driving (Action 2.2, Reference Code EN01). The County Council would ask that there be specific mention of the ROWIP as it is a statutory policy document for PRoW. It sets out a strategic approach for the protection and enhancement of the PRoW network, connecting the wider community and green open spaces, which would benefit the Neighbourhood Plan. There is also an omission throughout the draft Neighbourhood Plan of any map showing the PRoW network within the Parish. This should be amended with the inclusion of Map 16 or an extra Map which can be provided by the County Council upon request.

This policy should include the need for new developments to incorporate good sustainable transport connections within the community with high quality walking and cycling infrastructure available, which can link local amenities together. Replacing private vehicle journeys with active travel should be encouraged. The County Council is also disappointed that there is no mention of active travel objectives within this policy.

It is therefore critical that wording is included to secure funding to ensure that the highly regarded PRoW links are not degraded, as developer contributions can be used to upgrade existing routes or create new path links that address network fragmentation issues. The County Council advises that consideration should be given to the investment of planning obligation contributions and Community Infrastructure Levy (CIL) funding into the PRoW network.

## **8. Infrastructure Provision**

**PRoW:** The County Council recommends that reference is made to the ROWIP objective 'Improve Green Infrastructure', to improve infrastructure that can develop safe walking and cycling routes both within a new development and to connect to the wider environment. Increasing levels of active travel participation improves public health and well-being, in addition to improving air quality by reducing short vehicle journeys and vehicle congestion. Rural lanes provide useful connections for Non-Motorised Users (NMUs) travelling between off-road PRoW. The potential for additional vehicle traffic along these country lanes is

therefore a concern, as increased movements could introduce safety concerns for NMUs and potentially deter public use of the PRoW network.

The County Council notes that new development provides opportunities to secure investment in the PRoW network, which could enhance opportunities for active travel and outdoor recreation across the parish. Consideration should be given to the investment of developer contributions to upgrade existing routes or create new path links that address existing network fragmentation and issues highlighted by the public.

*Figure 39: How are services and infrastructure rated in Headcorn?*

PRoW: The County Council recommends that “*Footpaths in the village*” is amended to “**PRoW network**” in Figure 39, to demonstrate the opinions of residents on all PRoW within the parish.

#### *8.iv Promoting energy efficiency*

Heritage Conservation: The County Council notes that 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 have already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish and rebuild one. Historic England has produced a range of guidance on the role that heritage can play in mitigating climate change and historic building adaptation such as the [Climate Change Adaptation Report \(2016\)](#). This guidance demonstrates that historic structures, settlements and landscapes can be more resilient in the face of climate change and more energy efficient than more modern structures and settlements. This has also been updated in the Historic England report [There's no Place Like Old Homes: Re-use and Recycle to Reduce Carbon \(2019\)](#). The County Council would therefore recommend that this guidance is reflected within the draft Neighbourhood Plan.

#### *HNP Policy 4: Infrastructure provision*

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, supports the recognition of flood risk as an issue for the parish. The County Council also welcomes the Vision and Objectives for Headcorn to accommodate flood risk and the impacts that climate change will have on it.

The County Council requests clarification on how criterion C(4) will be achieved regarding who will assess the analysis of the capability of the sewerage systems and wastewater treatment works. The sewerage undertaker has a duty to accept new connections and will make their own assessment of the impacts on capacity.

It is recommended that this policy goes further by requiring that development in the parish, particularly any proposing to connect to the existing drainage network 'upstream' of known flooding hotspots (see paragraph 8.20 of the draft Neighbourhood Plan), provides improvements to reduce flood risk off-site.



## **10. The Economy**

### *10.iii Headcorn Aerodrome*

Heritage Conservation: It should be noted that, in addition to being a tourism asset, Headcorn Airfield is also an important heritage asset. The County Council is not aware of whether there has ever been a detailed heritage survey of the site, but it is likely that it contains structures and features of historic importance both within the airfield itself and within surrounding areas, for example, dispersal pens. It is important that these are conserved during normal airfield operations and in the event of any change of use.

### **Additional Commentary**

PRoW: It is requested that the County Council is directly involved in future discussions regarding projects that will affect the PRoW network. This will allow the County Council to advise on the design and delivery of these projects, ensuring that new routes successfully integrate with the existing PRoW network. Future engagement with the District and Parish Council is therefore welcomed to consider local aspirations for access improvements and potential funding sources for the delivery of these schemes.

The County Council requests that the definition and acronym of a Right of Way is included within the draft Neighbourhood Plan. The following definition is advised to be used:



***“A way over which the public have a right to pass and repass, including Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic”***

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, notes that there is no waste management infrastructure within the Neighbourhood Plan area.

However, there are three safeguarded land-won minerals in the area that are not referenced within the draft Neighbourhood Plan. These are shown below in the Maidstone Borough Council Minerals Safeguarding Areas proposals map within the adopted [Kent Minerals and Waste Local Plan](#) (KMWLP) (2013-2030).

Maidstone Borough Council Minerals Safeguarding Areas Proposals Map



-  Sub - Alluvial River Terrace Deposits
-  River Terrace Deposits
-  Limestone - Pauldina Limestone, Weald Clay Formation

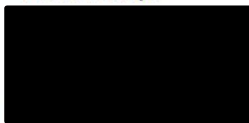
Although the draft Neighbourhood Plan is not seeking to allocate any additional residential development, speculative development proposals may still come forward on unallocated sites in order to address any identified future needs.

Therefore, any future development that would be constrained by these land-won safeguarded minerals would need to be considered against all the relevant adopted Development Plan policies. It is recommended that the draft Neighbourhood Plan includes an understanding of these safeguarded minerals and the following policies of the adopted KMWLP - Policy CSM 5: Land-won Mineral Safeguarding and Policy DM 7: Safeguarding Mineral Resources.

---

The County Council would welcome continued engagement as the 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,



Director for Growth and Communities

### A2.iii.c Response from Historic England



The Parish Clerk  
The Parish Office  
Headcorn Village Hall  
Church Lane  
HEADCORN  
Kent TN27 9NR

Our ref: PL00793392  
Your ref:  
Telephone 020 7973 3700  
Email [e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)  
Date 14 August 2023

[By email only to clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)

Dear Sir or Madam

#### Headcorn Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Headcorn Neighbourhood Plan.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.

Paragraph 190 of the [National Planning Policy Framework](#) (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of your parish features throughout the draft Neighbourhood Plan and that it will be a significant factor in any decisions on proposals that come within its ambit.

For further general advice we would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Kent County Council.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Yours sincerely

  
Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



## A2.iii.d Response from National Highways

---

**From:** [REDACTED]@nationalhighways.co.uk  
**Sent:** Tuesday, August 1, 2023 8:54 AM  
**To:** Clerk <clerk@headcornpc.org.uk>  
**Cc:** Planning SE <planningse@nationalhighways.co.uk>; Spatial Planning <SpatialPlanning@nationalhighways.co.uk>; transportplanning@dft.gov.uk; [REDACTED]  
**Subject:** NH/23/02022 - Headcorn Neighbourhood Plan - Regulation 14 - Consultation

**For Attention of:** Stefan Christodoulou, Parish clerk, Headcorn Parish Council

**Your Reference:** Headcorn Neighbourhood Plan - Regulation 14 - Consultation

**Our Reference:** NH/23/02022, #20737

---

L of 2

11/02/2024, 14:5

---

FW: NH/23/02022 - Headcorn Neighbourhood Plan - Regulation 14 - Consultation

Dear Stefan,

Thank you for your e-mail of 20 July 2023 consulting National Highways (NH) on the Headcorn Neighbourhood Plan (Regulation 14).

We are concerned about the safety, reliability, and/or operational efficiency of the Strategic Road Network (SRN), in this case the M20 and the A21 in the vicinity of the area covered by the Plan.

Given the distance of the Plan area from the SRN (over 11 miles from M20 junction 9 and over 12 miles from the junction of the A21 with the A262) and the fact that the Plan does not allocate sites for development, we are satisfied that the Headcorn Neighbourhood Plan would not have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN.

Our formal response to this consultation is **No Objection**.

We would like to thank you for consulting NH and welcome future opportunities to comment on the Plan as it progresses.

Should you or any others have any queries regarding our response, please contact us via [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk).

Kind regards,

[REDACTED] Assistant Spatial Planner  
South East Region, Operations Directorate  
National Highways

**Mobile:** [REDACTED]  
**Web:** <http://www.nationalhighways.gov.uk>

For information about our engagement with the planning system please visit <https://highwaysengland.co.uk/our-work/planning-and-the-strategic-road-network-in-england/>

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

**National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | [info@nationalhighways.co.uk](mailto:info@nationalhighways.co.uk)**

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

### **A2.iii.e Response from Loose Parish Council**

**From:** LoosePC Clerks <[office@loose-pc.gov.uk](mailto:office@loose-pc.gov.uk)>  
**Sent:** Monday, July 31, 2023 1:54 PM  
**To:** Clerk <[clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)>  
**Cc:** LoosePC Clerks <[office@loose-pc.gov.uk](mailto:office@loose-pc.gov.uk)>  
**Subject:** RE: Headcorn Neighbourhood Plan - Regulation 14 - Consultation

Hi Stefan,

Thank you for your email which I circulated to the Loose Parish Councillors. I have been asked to thank you for the opportunity to comment but advised that LPC usually only do so for a plan that is a very close neighbour, abutting the Loose Parish boundary. They wish you every success with your Neighbourhood Plan.

Kind regards,



Deputy Clerk to Loose Parish Council  
Main email: [office@loose-pc.gov.uk](mailto:office@loose-pc.gov.uk)  
Personal email: [deputy@loose-pc.gov.uk](mailto:deputy@loose-pc.gov.uk)

## A2.iii.f Response from National Gas Transmission



Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

T: +44 (0)191 261 2361  
F: +44 (0)191 269 0076

[avisonyoung.co.uk](http://avisonyoung.co.uk)



Our Ref: MV/15B901605

09 August 2023

Headcorn Parish Council  
[clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)  
via email only

Dear Sir / Madam  
**Headcorn Neighbourhood Plan Regulation 14 Consultation  
June – August 2023  
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### **About National Gas Transmission**

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

### **Proposed sites crossed or in close proximity to National Gas Transmission assets**

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

### **Distribution Networks**

Information regarding the gas distribution network is available by contacting:  
[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

### **Further Advice**

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Avison Young (UK) Limited registered in England and Wales number 6382509.  
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



[Redacted] Director

[nationalgas.uk@avisonyoung.com](mailto:nationalgas.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

[Redacted] Asset Protection Lead

[Redacted] [@nationalgas.com](mailto:[Redacted]@nationalgas.com)

National Gas Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[Redacted Signature]

Director

[Redacted Name]

For and on behalf of Avison Young



## A2.iii.g Response from National Grid Electricity Transmission



Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

T: +44 (0)191 261 2361  
F: +44 (0)191 269 0076

avisonyoung.co.uk



Our Ref: MV/ 15B901605

09 August 2023

Headcorn Parish Council  
[clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)  
via email only

Dear Sir / Madam  
**Headcorn Neighbourhood Plan Regulation 14 Consultation  
June – August 2023  
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### **About National Grid Electricity Transmission**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

### **Proposed development sites crossed or in close proximity to NGET assets:**

An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that it has no record of such assets within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to NGET infrastructure.

Avison Young (UK) Limited registered in England and Wales number 6382509.  
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



**Distribution Networks**

Information regarding the electricity distribution network is available at the website below:  
[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

**Further Advice**

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Development Liaison Officer**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid Electricity Transmission  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Director**

**For and on behalf of Avison Young**

## A2.iii.h Response from Catesby Estates

14 August 2023  
230814 HNP Letter Issue



The Parish Office  
Headcorn Village Hall  
Church Lane  
HEADCORN  
Ashford  
Kent  
TN27 9NR



74 High Street  
Sevenoaks TN13 1JR  
T: +44 (0) 1732 789 700  
F: +44 (0) 1732 789 789  
savills.com

Sent via email:  
[clerk@headcompc.org.uk](mailto:clerk@headcompc.org.uk)  
[assistantclerk@headcompc.org.uk](mailto:assistantclerk@headcompc.org.uk)

Dear Sir / Madam

### HEADCORN NEIGHBOURHOOD PLAN: REGULATION 14 CONSULTATION

I write on behalf of Catesby Strategic Land Ltd (Catesby) to provide comments on the Regulation 14 consultation of the Draft Headcorn Neighbourhood Plan (HNP). The HNP seeks to guide development in the area through the introduction of policies that aim to achieve the overarching vision for the Parish. The HNP does not seek to allocate any sites for housing. Catesby supports the Parish in preparing the HNP and the observations made within this letter are intended to help ensure that the Plan meets the basic conditions and can move forward to adoption.

This letter is written in respect of the land to the north of Moat Road which has a draft allocation within the Maidstone Borough Council (MBC) Local Plan Review (LPR). Catesby has control of the land and will bring forward an outline application in accordance with draft policy LPRSA310. Policy LPRSA310 sets out that the site is allocated for approximately 110 dwellings, at least 1.9 Ha of semi/natural open space and 0.8 open green amenity space.

#### Basic Conditions

This letter seeks to confirm the Basic Conditions that a Neighbourhood Plan must meet to ensure that the Parish Council has these at the forefront of their plan making process. A Neighbourhood Plan is required to meet the Basic Conditions which are contained in the Planning Practice Guidance (PPG), the Localism Act (2011) and paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). The Basic Conditions comprise:

- a) *having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,*

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.  
Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.  
A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



- b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,*
- c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,*
- d) *the making of the order contributes to the achievement of sustainable development,*
- e) *the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),*
- f) *the making of the order does not breach, and is otherwise compatible with, EU obligations, and*
- g) *prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order."*

Furthermore, the Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20190509) states:

*"Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested."*

With regard to point e), the HNP is drafted at a time in which Maidstone Borough Council (MBC) is preparing an emerging Local Plan (the Local Plan Review (LPR)).

The HNP timeline indicates that the Parish Council anticipate the Regulation 16 consultation to take place in November/December 2023, with an examination in January 2024, referendum in March / April 2024 and the HNP being made in May/June 2024.

The LPR has been heard at examination hearings by an Inspector and is now proceeding towards a main modifications consultation. Following the end of the Stage 2 hearings, the Inspector commented:

*"Having considered the Council's proposed modifications (principally presented in documents LPRSUB011 and D53) together with statements and discussion with participants at the hearing sessions, I consider that the Local Plan Review could be made sound by main modifications."*

As such, the LPR is likely to be adopted before the expected date in which the HNP is made. Whilst the LPR does not currently form part of the adopted Development Plan, it is important to acknowledge its advanced status and potential impact to the HNP and whether the policy and guidance reflect the strategic priorities within the LPR. Below are some examples which will need to be taken into account for the future consultations on the HNP:

- The settlement boundary currently shown reflects the adopted Local Plan boundary. This will need updating if the LPR is adopted.
- Policy Map 12 indicates a key view into Headcorn from Moat Road. This view will be changed slightly to accommodate the allocated development on the Land North of Moat Road.
- Policy 4 sets out parking standards. It is important that these reflect the Kent County Council parking standards as per the LPR Policy LPRTRA4.



- Policy 5 sets out density restrictions at a minimum of 15 dwellings per hectare (dph) and maximum of 30dph. This does not accord with LPR Policy LPRHou5 which expects development in rural service centres to achieve a density of 30 dph where it is compatible. Thus, the HNP should seek to achieve this also.
- Policy 5 also sets out a preference for the affordable housing mix. LPR Policy LPRSP10(B) sets out indicative tenure targets which currently reflect the preference within HNP Policy 5. However, the LPR Policy also refers to the Affordable and Local Needs Housing Supplementary Planning Document which sets out the housing mix is based upon the latest Strategic Housing Market Mix. Therefore, flexibility needs to be built into the HNP to allow for the tenure mix to be based upon the most up to date needs assessment.

#### Evidence Base

There is currently no evidence published which supports the HNP. It is advised that the HNP should be informed by relevant and up to date evidence. The PPG sets out the following regarding neighbourhood plan evidence:

*"Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order."*

Whilst policies and guidance within the HNP may have already been informed by evidence, this is currently not clear. Accordingly the evidence should be published with the Regulation 16 consultation.

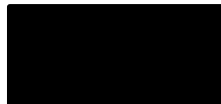
#### Summary

Catesby supports the Parish in preparing the HNP and the observations made above are intended to help ensure that the Plan meets the basic conditions and can move forward to adoption. Mainly the comments provided set out the need for the HNP to consider the LPR and how this may change the policies, guidance and maps within the HNP. It is also recommended that the HNP is informed by relevant and up to date evidence. This evidence should be published with the Regulation 16 consultation.

Catesby and Savills reserve the right to comment further on all elements of the emerging HNP including its evidence base, at future consultation stages.

If you would like to discuss the comments within this letter, Catesby and Savills would be happy to meet with the Parish Council.

Yours sincerely



Associate

## APPENDIX 3: RESIDENTS' SURVEY 2021 QUESTIONNAIRE

**8.1** The Headcorn Neighbourhood Plan Residents Survey was launched on February 1<sup>st</sup> 2021 using SurveyMonkey, with a deadline of March 14<sup>th</sup> 2021. Ten responses were received after the deadline. The Questionnaire used is shown below. See Section 4 for a summary of key results.



Headcorn Matters

### **HEADCORN RESIDENTS' SURVEY, February 2021**

**Your views really matter, as they will help shape the future of Headcorn. Therefore please complete this survey by 14th March 2021. The survey is for residents within the Parish aged 14 or over, and will help us understand how you would like to see Headcorn develop over the next 15 years.**

**The survey has been organised, because Headcorn is taking advantage of planning legislation to put together a Neighbourhood Plan. This will allow us to influence planning policies in our area, so it is important that it reflects the views of residents. Importantly, if we have a Neighbourhood Plan in place, the local community will have more say about how funding for infrastructure in Headcorn is spent.**

**If you have any problems, please contact the Parish Clerk on 01622 892496.**

**We hope that you are keeping safe in these difficult times. On behalf of the Headcorn Parish Council and residents of Headcorn - thank you!**

**Cllr Lyn Selby, Chairman of Headcorn Parish Council**



Headcorn Matters

\* 1. Do you live in Headcorn Parish?

- Yes
- No



Headcorn Matters

2. On a scale of 1 to 5 [where 5 is very good and 1 is very bad], how do you rate Headcorn as a place to live?

1	2	3	4	5
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Headcorn Matters

**Part I: Views on Headcorn and the Priorities for the Neighbourhood Plan**

3. The Vision underpinning the 2015 draft Headcorn Neighbourhood Plan was:

**Vision for Headcorn**

Our vision is for Headcorn to continue to thrive as a friendly, rural community with a strong local economy. We believe that Headcorn should evolve gradually over time in a way that, through appropriate choices of the scale and design of individual developments, preserves and enhances the distinctive character, landscape and setting of the village, while meeting the needs of local residents and businesses. This will be achieved by:

1. Maintaining a sense of being a country village, with a strong local community.
2. Supporting a vibrant local economy, based around the High Street, agriculture, leisure, tourism and small business enterprise.
3. Ensuring the village is supported by a robust infrastructure, designed to meet the needs of local residents and businesses.
4. Ensuring that there is a robust policy framework governing development in the countryside around Headcorn that will support both local needs and the benefits residents receive from being surrounded by beautiful countryside.
5. Ensuring that development in the Parish is managed in a way that is sustainable; promotes small scale development; is well designed; is capable of meeting the needs of local residents in different age groups and family units; and is in keeping with its setting.

**Does this remain the right vision for Headcorn?**

- Yes
- No
- Maybe

4. What changes would you make to the Vision, if any?





Headcorn Matters

5. One of the key reasons for introducing a Neighbourhood Plan is that it will enable the community to have more influence over the priorities for local infrastructure spending. To help identify what those priorities should be, thinking about how the village is likely to develop over the next 20 years, how do you rate the provision of the following in Headcorn?

[TICK ONE FOR EACH TYPE OF INFRASTRUCTURE]

	Excellent - just maintain existing provision	OK, but some improvement likely to be needed	Bad - improvement needed now	No need for this in Headcorn	Don't know
Public transport (Trains)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public transport (Buses)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Broadband services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mobile phone reception	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nursery school facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local primary school	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Secondary school provision close to Headcorn	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road safety measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicle parking facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bicycle parking facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Footpaths in the village	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sewage and storm drainage system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public toilet facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Litter bins	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Children's playgrounds (under 11's)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adventure playgrounds (teenagers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilities for young people	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Sports and leisure facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessible natural green space	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allotments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access for disabled	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public library	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Village Hall	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Medical facilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



## Headcorn Matters

6. Headcorn Parish Council has been considering various options that might help enhance or protect our physical environment. Which ones do you support? [Tick all that you support]

- Creating a wildlife sanctuary with access to the River Beult
- Establishing a large area of accessible natural green space that is in easy reach of the village centre
- Establishing a natural burial ground within the Parish
- Ensuring that any new development will not have a detrimental impact on distinctive views within the village Conservation area
- Ensuring that any new development will not have a detrimental impact on distinctive views of the surrounding countryside from key viewing points in the village
- Ensuring that any new roads visually resemble country lanes and traditional village streets
- Ensuring that any new developments will respect and sensitively incorporate historic features
- Ensuring that any new developments will respect the natural contours of the site and protect and sensitively incorporate natural features such as trees, hedgerows and ponds
- Ensuring that existing footpaths are protected and enhanced
- Ensuring that new developments in the village are supported by green footpaths that help support links to the village centre



## Headcorn Matters

7. Over the years residents have expressed significant concerns about traffic issues, including issues of traffic safety. To deal with these concerns, we have various suggestions we would like to get your views on. Let us know which ones you support.

[Tick all that you support]

- Introducing a pedestrian crossing by the station
- Introducing traffic calming measures, such as a traffic island, on northern edge of the village on the A274 (towards Maidstone) to slow traffic into the village
- Adding speed calming measures on the principal side roads into the village (e.g. Lenham Road and Moat Road) as they cross the village boundary
- Adding bollards to Oak Lane to reduce its width at key points, to reduce traffic speed
- Making Oak Lane/Forge Lane one way to help make the Oak Lane/Wheeler Street and Forge Lane/High Street junctions safer
- Adding physical markings showing the speed limit on the road surface of the A274 approaching the High Street from both the north and the south, starting from the edge of the 30 mile per hour speed zone
- Making the sections of the Kings Road and the Ulcombe Road that are close to the Primary School 20 Mile Per Hour Zones
- Making all roads within the village boundary, except the A274, 20 Mile Per Hour Zones
- Making all roads within the village boundary, including the A274, 20 Mile Per Hour Zones
- Adding cycle lanes in all new developments of more than 10 houses
- Creating cycle lanes on existing roads within the village
- Improving cycle parking in the centre of the village
- Improving vehicle parking in the centre of the village
- Ensuring that no new development will be permitted where it would result in the loss of strategic parking facilities in the village that support either the High Street, or key services such as the train station or Doctors' surgery



Headcorn Matters

8. What type of homes should be prioritised in any future developments in Headcorn?  
[TICK ONE FOR EACH TYPE OF HOUSING]

	High priority	Medium priority	Low priority	Don't know
Homes for people to buy (at market prices)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Homes for people to rent (at market prices)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sheltered homes, for those in need of extra care and support, to buy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sheltered homes, for those in need of extra care and support, to rent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Homes with shared equity (part rent, part buy)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Homes for key workers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Homes provided, eg by Housing Associations, to rent at below market prices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gypsy and traveller sites to buy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gypsy and traveller sites to rent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sites for people to build their own homes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Headcorn Matters

9. Some new housing may be needed in Headcorn parish over the next 20 years. If housing is needed, how suitable do you think the following locations would be as a site for new developments in and around the village?

[TICK ONE FOR EACH LOCATION]

	Definitely suitable, subject to planning permission	Possibly suitable, depending on the proposed development	Definitely not suitable	Don't know
Within the existing Headcorn village boundary	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the outskirts of the village, north along the A274 towards Sutton Valence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the outskirts of the village, south along the A274 towards Biddenden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the outskirts of the village, north along the Ulcombe Road	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the outskirts of the village, east along the Lenham Road	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the outskirts of the village, east along Grigg Lane	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the outskirts of the village, east along the Smarden Road	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On the outskirts of the village, west along Moat Road	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In the wider countryside with Headcorn Parish	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



## Headcorn Matters

10. What approach to individual housing development schemes do you think the Headcorn Neighbourhood Plan should take?

[Tick your preferred option]

- The Neighbourhood Plan should simply manage what would make any 'windfall' sites (in other words sites that are not in any Plan) acceptable
- The Neighbourhood Plan should look to allocate sites explicitly
- The Neighbourhood Plan should both look to allocate sites and manage what would make any 'windfall' sites acceptable

11. How big should individual housing development schemes in Headcorn village be?

[Tick One]

- No more than 10 houses
- No more than 25 houses
- No more than 75 houses
- No more than 100 houses
- No more than 150 houses
- No more than 200 houses
- There should be no maximum level for the size of individual housing schemes



Headcorn Matters

**Part II: Housing Needs**

12. Do you, or someone in your family, currently want to move out into a separate home?

- Yes
- No
- Not sure



Headcorn Matters

13. If yes, how many additional housing units are needed?

[Enter a number into the box]

14. Would you, or they, prefer to live in Headcorn Parish?

[Tick one]

- Yes
- No



Headcorn Matters

15. What is the main reason you or they have not moved out?

[Tick all that apply]

- Can't afford to buy in Headcorn
- Can't find anywhere suitable to rent in Headcorn
- Can't afford to rent in Headcorn
- Can't find anywhere suitable to buy in Headcorn
- Needed by family
- Other (please specify)

16. What size of property would be needed, if moving was an option?

[Tick all that apply]

- One bedroom
- Two bedrooms
- Three bedrooms
- Four bedrooms
- Five or more bedrooms

17. What type of home would be ideal?

[Tick all that apply]

- Owner occupied
- Private rented
- Rented from a Housing Association (eg Golding Homes) at below market rents
- Shared equity (part rent, part buy)
- Sheltered accommodation, for those in need of extra care and support, to buy
- Sheltered accommodation, for those in need of extra care and support, to rent
- A mobile home pitch to buy
- A mobile home pitch to rent





Headcorn Matters

18. Is there anyone in the house, who does not currently need their own home, but is likely to want one in the Headcorn Parish in the next five to ten years? [Tick One]

- Yes
- No



Headcorn Matters

19. If yes, how many people?  
[Enter number in the box]



Headcorn Matters

20. Do you know anyone (including yourself) who is not currently living in Headcorn, but would like to move here if they could?

[Tick one]

- Yes
- No



Headcorn Matters

21. If yes, how many separate households would be needed to accommodate everyone?  
[Enter number in the box]

22. What are the main reasons that they (or you) are not currently living in Headcorn?  
[Tick all that apply]

- |   |   |
|---|---|
| <input type="checkbox"/> Can't afford to buy in Headcorn                            | <input type="checkbox"/> Need to be closer to a better primary school |
| <input type="checkbox"/> Can't afford to rent in Headcorn                           | <input type="checkbox"/> Need to be closer to a university            |
| <input type="checkbox"/> Can't find anywhere suitable to buy in Headcorn            | <input type="checkbox"/> There is no where big enough available       |
| <input type="checkbox"/> Can't find anywhere suitable to rent in Headcorn           | <input type="checkbox"/> There is no where small enough available     |
| <input type="checkbox"/> Concerns over the availability of employment opportunities | <input type="checkbox"/> Lack of suitable sheltered housing           |
| <input type="checkbox"/> Concerns over how far they would need to commute to work   | <input type="checkbox"/> Lack of suitable land to buy                 |
| <input type="checkbox"/> Need to be closer to a better secondary school             | <input type="checkbox"/> Poor local public transport links            |



Headcorn Matters

**Part III: Background information**

**In order to allow us to demonstrate that this public consultation is representative of our community, and to help us understand how the needs of different parts of the community differ, please provide some information about yourself.**

23. Are you?

[Tick one]

- Female
- Male
- I prefer to describe myself as

- I prefer not to say

24. How old are you?

[Tick one]

- |                                |  |
|--------------------------------|--|
| <input type="checkbox"/> 14-18 | <input type="checkbox"/> 66-75               |
| <input type="checkbox"/> 19-21 | <input type="checkbox"/> 76-85               |
| <input type="checkbox"/> 22-35 | <input type="checkbox"/> Over 85             |
| <input type="checkbox"/> 36-50 | <input type="checkbox"/> I prefer not to say |
| <input type="checkbox"/> 51-65 |  |

25. How would you describe your ethnic origin? (Just skip this question, if you would prefer not to say.)

26. What best describes the property you are living in?

[Tick one]

- |  |   |
|--|---|
| <input type="radio"/> Owner occupied                                       | <input type="radio"/> Static mobile on your own land  |
| <input type="radio"/> Privately rented                                     | <input type="radio"/> Sheltered accommodation to own  |
| <input type="radio"/> Rented from a Housing Association (eg Golding Homes) | <input type="radio"/> Sheltered accommodation to rent |
| <input type="radio"/> Shared equity (part rent, part buy)                  | <input type="radio"/> I prefer not to say             |
| <input type="radio"/> Static mobile on a rented site                       |   |

27. What is the size of the property you are living in?

[Tick one]

- |                                      |   |
|--------------------------------------|---|
| <input type="radio"/> One bedroom    | <input type="radio"/> Four bedrooms         |
| <input type="radio"/> Two bedrooms   | <input type="radio"/> Five or more bedrooms |
| <input type="radio"/> Three bedrooms | <input type="radio"/> I prefer not to say   |

28. Do you have any children living with you who were in the following age brackets on 1st January 2021?

[Tick all that apply]

- |  |  |
|--|--|
| <input type="checkbox"/> None                        | <input type="checkbox"/> Between 17 and 18 years old |
| <input type="checkbox"/> Less than 5 years old       | <input type="checkbox"/> Between 19 and 21 years old |
| <input type="checkbox"/> Between 5 and 11 years old  | <input type="checkbox"/> Over 21 years old           |
| <input type="checkbox"/> Between 12 and 16 years old | <input type="checkbox"/> I prefer not to say         |

29. How long have you lived in Headcorn?

[Tick one]

- |   |   |
|---|---|
| <input type="radio"/> Less than a year        | <input type="radio"/> Between 20 and 30 years |
| <input type="radio"/> Between 1 and 5 years   | <input type="radio"/> Between 30 and 50 years |
| <input type="radio"/> Between 5 and 10 years  | <input type="radio"/> Over 50 years           |
| <input type="radio"/> Between 10 and 15 years | <input type="radio"/> Never                   |
| <input type="radio"/> Between 15 and 20 years | <input type="radio"/> I prefer not to say     |



Headcorn Matters

30. Please use the space below if you have any further comments to make, including about anything that you feel has not been covered in the survey



Headcorn Matters

**Thank you for completing this survey and helping Headcorn Parish Council to help the local community**



## **APPENDIX 4: THE MAKING OF HEADCORN'S NEIGHBOURHOOD PLAN**

**9.1** This Appendix sets out the history and background to Headcorn's Neighbourhood Plan.

### **A4.i Background to Headcorn's Neighbourhood Plan**

**9.2** The production of a Neighbourhood Plan for Headcorn has been a long time in the making.

**9.3** Recognising that it could be a potentially powerful tool, Headcorn Parish Council made the decision in October 2012 to prepare a Neighbourhood Plan for Headcorn to help shape any development that would be proposed. Headcorn Parish was designated as a Neighbourhood Area in April 2013. As part of the initial community engagement, the local community chose Headcorn Matters as the name for Headcorn's Neighbourhood Plan project.

**9.4** Following the designation of Headcorn as a Neighbourhood Plan area, significant work was undertaken with the help of volunteers from the wider community, in particular the Headcorn Matters team, in order to produce a draft Neighbourhood Plan. This work included a very significant programme of evidence gathering to support the choice of policies for the Neighbourhood Plan. Headcorn's approach to this was even used as a case study on how to gather evidence to support a Neighbourhood Plan.<sup>11</sup> In addition, policy choices were informed by Neighbourhood Plan policies that had passed examination elsewhere.

**9.5** A draft Neighbourhood Plan for Headcorn was produced in 2015 and Headcorn Parish Council conducted its Regulation 14 Consultation in June 2015, and submitted a revised draft under Regulation 15 in October 2015. The approach of working with local residents and businesses to identify what was needed meant that Headcorn's draft Neighbourhood Plan enjoyed considerable local support. This was demonstrated in the 2015 Regulation 14 Consultation, where 93.9% of residents who responded to the Consultation supported the proposed Neighbourhood Plan.<sup>12</sup>

**9.6** However, there were significant delays in the examination process, meaning that an examiner's report for Headcorn's draft Neighbourhood Plan was not issued until March 2017. During this delay Maidstone Borough Council made significant progress in producing a Local Plan for Maidstone: issuing the Regulation 19 Consultation draft in the spring of 2016; proceeding to examination in autumn 2016; and receiving an interim examiner's report on Maidstone's Local Plan in December 2016, with the final report issued in July 2017. This Local Plan proposed far more development in Headcorn than had been the case

---

<sup>11</sup> Headcorn's approach to evidence gathering was used as a case study by Planning Aid to help those undertaking a Neighbourhood Plan to understand some of the issues involved, see <http://www.ourneighbourhoodplanning.org.uk/case-studies/view/314>.

<sup>12</sup> As part of Headcorn's 2015 Regulation 14 Consultation, as well as being given an opportunity to provide general comments on the plan, residents were also asked six specific questions on the plan itself. Question 1 was "Do you support the Draft Neighbourhood Plan?, Yes/No". 93.9% responded yes, 5.2% no and 0.9% gave a qualified yes.

in the (2000) adopted Development Plan for the area. At the time when Headcorn's Neighbourhood Plan was drafted, the existing Development Plan only allowed minor development in rural settlements such as Headcorn, and had not allocated any specific sites in the Parish. Recognising this policy background, as well as significant support amongst local residents for promoting small scale (rather than large) developments, encouraging small scale development was a key part of Headcorn's 2015 draft Neighbourhood Plan.

**9.7** Differences in the approach to development in Headcorn in the 2015 draft Neighbourhood Plan and the 2016 draft Local Plan meant that Headcorn's Neighbourhood Plan examiner decided that Headcorn's Neighbourhood Plan did not meet the basic conditions. However, recognising the very considerable local support for Headcorn's draft Neighbourhood Plan, Maidstone Borough Council proposed that instead of accepting the examiner's recommendation, there should be a negotiation to try and find a way to allow the Plan to be deemed to have met the basic conditions and proceed to a referendum. Unfortunately this negotiation was not successful, leaving the draft Plan in limbo.

**9.8** However, although the Plan itself was never formally adopted, the evidence gathered to support it successfully identified key issues for the local community and was used by Headcorn Parish Council to achieve change. In particular, the draft Plan identified two preconditions that were needed to support development: the need to ensure that Headcorn Primary School was able to expand in its existing location in the centre of the village; and the need for the sewerage system to be upgraded. Both these have been achieved:

- At the time work first started on Headcorn's Neighbourhood Plan, Headcorn's Primary School was oversubscribed and Kent County Council was looking at a range of options to meet the need for school places, including moving it to a location on the edge of the village and expanding provision in other villages. Using the evidence gathered, Headcorn Parish Council and the Neighbourhood Plan team successfully helped to persuade Kent County Council that the Primary School should instead be expanded to two form entry, and equally importantly that it should do so in its original location.
- Sewerage and storm water drainage was identified in the original residents' survey as a very significant problem for Headcorn. The most obvious manifestation of this was that sewage would emerge at low points in the network during heavy rain, primarily in the Moat Road area. In order to inform the debate and persuade others of the need for change, building on its survey work, Headcorn Parish Council commissioned a study of the sewerage network in Headcorn. This identified that the system had significant problems, including 15 sewage pipes that already had insufficient capacity, 14 sewage pipes that suffered from back-fall and 74 sewage pipes that were not self-cleaning due to inadequate flow.<sup>13</sup> Although not all these issues have been addressed, Southern Water was persuaded by Headcorn Parish Council of the need to upgrade the system at Moat Road, which means that sewage no longer emerges onto the road during heavy rain.

---

<sup>13</sup> Sandersons (Consulting Engineers) Ltd (2015).

**9.9** In November 2019 Headcorn Parish Council again decided to consider producing a Neighbourhood Plan for the Parish. It set up another steering group to make recommendations. This group concluded that, given its popularity and the huge volume of evidence underpinning it, the starting point for any new Neighbourhood Plan should be the previous Regulation 16 draft, but that work would be needed to ensure that it aligned to the Maidstone Borough Local Plan, which was adopted in October 2017, and that this work would require looking again at the validity of some of the policies. In addition, it was recommended that it would be advisable to undertake another survey of residents, in order to check that the evidence underpinning the previous Plan remained valid.

**9.10** In light of these recommendations, in February 2020 Headcorn Parish Council made the decision to hire Analytically Driven Ltd to undertake the necessary survey work, as well as to help the Parish Council to produce a draft Neighbourhood Plan. However, the onset of the pandemic in March 2020 meant that work was paused.

**9.11** The new Residents' Survey was finally issued to residents in February 2021, with a response deadline of March 14<sup>th</sup> 2021. In general the responses provided strong support for the core policies in the previous draft Plan. In particular, the Vision underpinning the previous draft Plan was overwhelmingly supported by those responding to the survey.<sup>14</sup> There was similarly very strong support for encouraging small scale development, with 77% of respondents wanting individual developments to be at most 25 houses.

**9.12** The 2021 Residents' Survey, as well as engagement with Maidstone Borough Council, has informed the new draft Plan. In consultation with the steering group, the resulting Policy framework has been simplified and condensed.<sup>15</sup> At its core, however, is the Vision that underpinned the previous draft Plan, as this Vision was overwhelmingly supported by those responding to the survey.

**9.13** A draft Neighbourhood Plan was shared with Maidstone Borough Council in March 2022 for comments, as well as with Kent County Council in July 2022. The Plan was reviewed in light of these comments, and a revised draft was issued in November 2022 for Maidstone Borough Council to use as the basis for consulting with statutory consultees for a formal decision on whether a Strategic Environmental Assessment is needed. On the basis of these consultations, Headcorn Parish Council was advised by Maidstone Borough Council on 10<sup>th</sup> May 2023 that a formal Strategic Environmental Assessment would not be needed in the case of Headcorn's Neighbourhood Plan.<sup>16</sup>

---

<sup>14</sup> 82% of participants in the 2021 Headcorn Residents' Survey supported the draft Vision, with an additional 15% ticking maybe. In total only 3% of residents opposed the draft Vision for Headcorn.

<sup>15</sup> The 2015 draft Neighbourhood Plan contained 34 Policies supporting the Vision for Headcorn.

<sup>16</sup> This advice is based on the emerging policies in Headcorn's Neighbourhood Plan, and on their discussions with the statutory consultees.



## APPENDIX 5: REFERENCES

- Burgess, S, Briggs, A, McConnell, B and Slater, H (2006) "School choice in England: background facts", Centre for Market and Public Organisation, Working Paper No 06/159.
- Department for Communities and Local Government (2015) "Planning Policy for traveler sites", August 2015, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf).
- Driver, R (2014) "Analysing the sustainability of housing development in Headcorn: How much development would be sustainable?", Analytically Driven Ltd, [http://www.analytically-driven.com/uploads/2/7/8/1/27818525/sustainability\\_of\\_housing\\_development\\_in\\_headcorn\\_-\\_background\\_report\\_to\\_support\\_the\\_neighbourhood\\_plan\\_-\\_final\\_draft\\_-\\_december\\_2014.pdf](http://www.analytically-driven.com/uploads/2/7/8/1/27818525/sustainability_of_housing_development_in_headcorn_-_background_report_to_support_the_neighbourhood_plan_-_final_draft_-_december_2014.pdf).
- Halcrow Group Limited (2010) "Water Cycle Study", Maidstone Borough Council.
- JBA Consulting (2020) "Maidstone Borough Council Level 1 SFRA update and Level 2 SFRA: Final report", [https://localplan.maidstone.gov.uk/\\_data/assets/pdf\\_file/0004/372586/7-SFRA-Level-1-update-and-Level-2.pdf](https://localplan.maidstone.gov.uk/_data/assets/pdf_file/0004/372586/7-SFRA-Level-1-update-and-Level-2.pdf).
- Maidstone Borough Council (2021) "Headcorn Conservation Area: Conservation Area Appraisal and Management Plan", Draft October 2021.
- Maidstone Borough Council (2017) "Maidstone Borough Local Plan: Adopted 25 October 2017", [https://maidstone.gov.uk/\\_data/assets/pdf\\_file/0005/171149/Local-Plan-v2-November-2017.pdf](https://maidstone.gov.uk/_data/assets/pdf_file/0005/171149/Local-Plan-v2-November-2017.pdf).
- Maidstone Borough Council (2013) "Consultation draft: Maidstone Borough Council Green and Blue Infrastructure Strategy", [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0013/42421/Draft-Green-and-Blue-Infrastructure-Strategy-December-2013.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0013/42421/Draft-Green-and-Blue-Infrastructure-Strategy-December-2013.pdf)
- Manning, Alan, and Barbara Petrongolo. 2017. "How Local Are Labor Markets? Evidence from a Spatial Job Search Model." *American Economic Review*, 107 (10): 2877-2907.
- Ministry of Housing Communities & Local Government (2021) "National Planning Policy Framework", July 2021, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).
- Therivel, R. (2015) "Sustainability appraisal of possible strategic development sites in Headcorn", Levett-Therivel, Headcorn Parish Council, (<http://www.headcornpc.kentparishes.gov.uk>).
- Sanderson (Consulting Engineers) Ltd (2015) "Headcorn foul drainage assessment", Sanderson Associates (Consulting Engineers) Ltd.

**Copyright:** © Headcorn Parish Council, 2024

**For more information contact:**

Headcorn Parish Council,  
Parish Office,  
Headcorn Village Hall,  
Church Lane,  
Headcorn,  
TN27 9NR  
Phone:01622 892496  
Email: [clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)  
<https://headcornpc.org/>

# HEADCORN MATTERS

## BASIC CONDITION STATEMENT FOR HEADCORN PARISH NEIGHBOURHOOD PLAN: 2022-2038



**ISSUED BY: HEADCORN PARISH COUNCIL IN  
ACCORDANCE WITH TOWN AND COUNTRY  
PLANNING ACT 1990 (AS AMENDED) PARAGRAPH  
8(2) OF SCHEDULE 4B**

Submission date: March 2024

# CONTENTS

<b>1.</b>	<b>Introduction</b>	<b>4</b>
1.i	The Legal Requirements	4
1.ii	The Basic Conditions	4
<b>2.</b>	<b>Prescribed Matters and Prescribed Conditions</b>	<b>6</b>
<b>3.</b>	<b>Regard to National Policies and advice</b>	<b>8</b>
3.i	National policies and the approach to plan making	9
3.i.a	National Planning Policy for Traveller Sites	10
3.i.b	National Planning Policy Guidance	12
3.ii	National policy and HNP1: Design and Design Guidance	12
3.iii	National policy and HNP2: Siting, Landscaping and protecting the natural and historic environment and setting	13
3.iv	National policy and HNP3: Connectivity and access	14
3.v	National policy and HNP4: Infrastructure provision	15
3.vi	National policy and HNP5: New dwellings	16
3.vii	National policy and HNP6: The economy	18
<b>4.</b>	<b>Contributes to the Achievement of Sustainable Development</b>	<b>20</b>
4.i	The Economic Objective	21
4.ii	The Social objective	24
4.iii	The Environmental Objective	25
<b>5.</b>	<b>General Conformity with the Strategic Policies Contained in the Development Plan</b>	<b>28</b>
5.i	General conformity and site allocations	30
5.i.a	Site allocations and the emerging Local Plan	30
5.ii	Maidstone Local Plan and HNP1: Design and Design Guidance	31
5.ii.a	Maidstone Emerging Local Plan and HNP1: Design and Design Guidance	32
5.iii	Maidstone Local Plan and HNP2: Siting, Landscaping and protecting the natural and historic environment and setting	32
5.iii.a	Maidstone Emerging Local Plan and HNP2: Siting, Landscaping and protecting the natural and historic environment and setting	34
5.iv	Maidstone Local Plan and HNP3: Connectivity and access	35
5.iv.a	Maidstone Emerging Local Plan and HNP3: Connectivity and access	35
5.v	Maidstone Local Plan and HNP4: Infrastructure provision	36
5.v.a	Maidstone Emerging Local Plan and HNP4: Infrastructure provision	37
5.vi	Maidstone Local Plan and HNP5: New dwellings	38
5.vi.a	Maidstone Emerging Local Plan and HNP5: New dwellings	40

5.vii	Maidstone Local Plan and HNP6: The economy	40
5.vii.a	Maidstone Emerging Local Plan and HNP6: The economy	41
<b>6.</b>	<b>Does Not Breach EU Obligations</b>	<b>42</b>
	<b>Appendix 1: Maidstone Borough Council – Record of Decision Approving Headcorn Parish as a Neighbourhood Plan Area</b>	<b>44</b>
	<b>Appendix 2: Maidstone Borough Council - Strategic Environmental Assessment and Habitats Regulations Assessment - Screening Assessment</b>	<b>46</b>
	<b>Appendix 3: References</b>	<b>62</b>

## **LIST OF HEADCORN NEIGHBOURHOOD PLAN MAPS**

HNP Policy Map 1:	Designated Neighbourhood Area for Headcorn Parish	6
HNP Policy Map 3:	Headcorn’s position relative to local urban centres	22

## **LIST OF FIGURES**

Figure 1:	Maidstone Borough Council’s Local Plan approach to sequential flood risk assessment..	34
-----------	---	----

## **1. INTRODUCTION**

**1.1** This Basic Conditions Statement sets out how Headcorn Parish Council has met the legal requirements and basic conditions in producing a Neighbourhood Plan for Headcorn Parish.

### **1.i The Legal Requirements**

**1.2** The legal requirements underpinning Neighbourhood Plans are that:

- The Plan has been submitted by a qualifying body and consent has been obtained from all relevant parish or town councils for areas included in the plan, if the plan is a multi-parish plan;
- The Plan covers a designated neighbourhood area;
- The neighbourhood plan sets out policies in relation to the development and use of land in the whole or any part of a neighbourhood area that can be used in the determination of planning applications;
- The proposed neighbourhood plan states the period covered;
- The policies do not cover excluded development, such as county matters (mineral extraction and waste development) and Nationally Significant Infrastructure Projects; and
- The proposed neighbourhood plan does not cover more than one neighbourhood area, as there can only be one neighbourhood plan in force for each area.

### **1.ii The Basic Conditions**

**1.3** In addition to the legal requirements set out above, a draft Neighbourhood Plan can only be put to a referendum and be made, if the Neighbourhood Plan's policies are deliverable and meet certain basic conditions. These basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004. In particular, the Basic Conditions cover:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

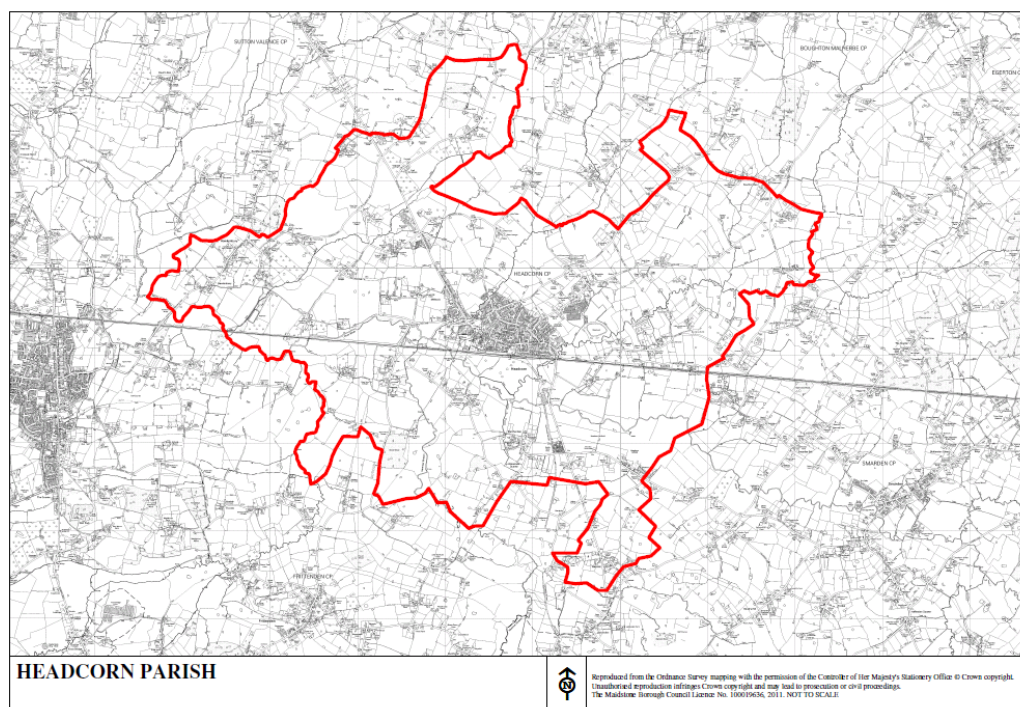
**1.4** Not all these Basic Conditions apply to a Neighbourhood Plan. In particular, conditions (b) and (c) only apply to Neighbourhood Development Orders, which grant planning permission for specific types of development in a particular area. These basic conditions do not therefore apply to Headcorn's Neighbourhood Plan.

**1.5** The remainder of this Basic Conditions statement sets out how Headcorn's draft Neighbourhood Plan meets the relevant Basic Conditions set out in law.

## 2. PRESCRIBED MATTERS AND PRESCRIBED CONDITIONS

2.1 For any Neighbourhood Plan to be adopted it must meet the prescribed conditions.

### HNP Policy Map 1: Designated Neighbourhood Area for Headcorn Parish



Source: Ordnance Survey

2.2 The draft Neighbourhood Plan issued by Headcorn Parish Council meets the necessary legal requirements. Specifically the Plan:

- is a Neighbourhood Development Plan and contains land use planning policies that can be used in the determination of planning applications.
- is being submitted by a qualifying body, namely Headcorn Parish Council. See Appendix 1 for the Maidstone Borough Council Record of Decision approving Headcorn Parish Council as a qualifying body.
- relates to the Parish of Headcorn and no other area, as shown in HNP Policy Map 1 (above), and the Parish of Headcorn has been designated a qualifying area. The Plan does not relate to more than one neighbourhood area and there are no other Neighbourhood development plans in place within the neighbourhood area. See Appendix 1 for the Maidstone Borough Council Record of Decision approving Headcorn Parish as a Neighbourhood Plan area.
- states the period for which it is to have effect. The plan period is 2022 – 2038. This period has been chosen to align the Neighbourhood Plan with the end period of the draft Maidstone Borough Local Plan being prepared by Maidstone Borough Council, which was submitted for examination in March 2022.



- does not contain policies that relate to excluded development. The Neighbourhood Plan does not deal with county matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.
- relates to planning matters and has been prepared in accordance with the Neighbourhood Planning Regulations 2012.
- has been informed by discussions with neighbouring Parish Councils regarding their aspirations and planning issues of cross-boundary importance. It is not considered that there is any benefit in extending the area for the referendum beyond the designated Neighbourhood Plan Area.

**2.3** In addition, Headcorn Parish Council considers that the policies in the draft Headcorn Neighbourhood Plan are all deliverable.

**2.4** There are no other prescribed matters.

### 3. REGARD TO NATIONAL POLICIES AND ADVICE

**3.1** For any Neighbourhood Plan to be adopted it must have regard to national policies, including the National Planning Policy Framework (NPPF) itself.<sup>1</sup> To meet the test of “has regard to” national policies, a neighbourhood plan must not constrain the delivery of important national policy objectives. The NPPF is the main document setting out the government’s planning policies for England and how these are expected to be applied.<sup>2</sup>

**3.2** Different parts of the NPPF will be relevant to individual policies within a Neighbourhood Plan. However, the overarching requirements for a Neighbourhood Plan to “have regard to” national policies within the NPPF are that it should:

- support the delivery of strategic policies contained in local plans and spatial development strategies (NPPF Paragraph 13);
- positively support local development, shaping and directing development in their area that is outside these strategic policies (NPPF paragraph 13);
- should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies (NPPF paragraph 29);<sup>3</sup> and
- help to deliver the three objectives underpinning sustainable development (NPPF paragraphs 8 and 11).

**3.3** In the case of the NPPF published in December 2023, key policies include:

- the policies designed to achieve sustainable development set out in Section 2 of the NPPF, including the definition of sustainability set out in Paragraph 8, and the emphasis on the presumption in favour of sustainable development, including the implications of this for plan-making, as set out in Paragraph 11;
- The approach to plan-making set out in paragraph 13 and Section 3 of the NPPF, including the purpose and impact of Neighbourhood Plans as set out in Paragraphs 29-30, the potential need for a Strategic Environmental Assessment (SEA) set out in Footnote 17 to Paragraph 32, and the background to the basic conditions for a Neighbourhood Plan set out in Paragraph 37;
- The policy around gypsy and traveller sites set out in paragraph 4 and the National Planning Policy for Traveller Sites;
- The requirements around infrastructure and developer contributions, set out paragraph 34;
- The requirements around affordable homes (as defined in the NPPF, which involves homes at below market prices), including affordable homes to buy, set out in Paragraphs 6 and 64-66;<sup>4</sup>

---

<sup>1</sup> The most recent version of the NPPF, which is the version used when applying the test here, was published in December 2023.

<sup>2</sup> See National Planning Policy Guidance Paragraph: 069 Reference ID: 41-069-20140306.

<sup>3</sup> See National Planning Policy Guidance Paragraph: 070 Reference ID: 41-070-20190509.

<sup>4</sup> See Appendix 1 of Headcorn’s Neighbourhood Plan for the full definition of affordable homes as set out in the 2023 NPPF.

- The need for Local Planning Authorities to set out a housing requirement for designated Neighbourhood Areas, see Paragraphs 67-68;
- The importance of small and medium sites, including the implications for Neighbourhood Plans, as set out in Paragraphs 70-71;
- The policy on rural housing, including the need to avoid isolated homes, set out in Paragraphs 82-84;
- The policy on rural economic development set out in Paragraphs 88-89;
- The policy on retail and leisure development outside town centres set out in Paragraphs 94-95;
- The policies on promoting healthy and safe communities, including policies on promoting inclusivity and social interaction, and open spaces and recreation set out in Section 8;
- The policies on promoting sustainable transport set out in Section 9, including policies on parking standards in Paragraphs 111-112;
- The policy on supporting full fibre broadband connections in Paragraph 118;
- The policy on housing density set out in Paragraphs 128-130;
- The policies underpinning achieving well-designed places set out in Section 12, including the introduction of a national Design Code and National Model Design Code;
- The policies on meeting the challenge of climate change set out in Section 14, including policies on flood risk set out in Paragraphs 165-175;
- The policies on conserving and enhancing the natural environment set out in Section 15; and
- The policies on conserving and enhancing the historic environment set out in Section 16.

**3.4** In the case of Headcorn, the national policy covering planning policy for traveller sites is also relevant, given the high share of gypsy and traveller sites within Headcorn Parish. In addition, the advice set out in National Planning Policy Guidance, particularly in relation to Neighbourhood Plans, also applies.

**3.5** The sections below set out how the approach taken to developing Headcorn's Neighbourhood Plan meets the overarching need to "have regard to" national policies, as well as how individual policies within the Neighbourhood Plan also have regard to relevant national policy.

### **3.i National policies and the approach to plan making**

**3.6** Headcorn Parish Council has had regard to national policies in producing the Headcorn Neighbourhood Plan, including the relevant policies within the NPPF, national planning guidance and planning policy for travellers. How individual policies have had regard to national policy is set out below. However, it is also important that the overarching approach to the development of Headcorn's Neighbourhood Plan has met the requirement of having regard to national policies.

**3.7** Headcorn's Neighbourhood Plan had regard to the policies within the NPPF by:

- Ensuring that the Headcorn Neighbourhood Plan can meet the Basic Conditions (NPPF paragraph 37);
- Seeking to develop a shared vision for Headcorn to ensure that the Neighbourhood Plan will shape, direct and help deliver sustainable development, with 83% of respondents to the 2021 Residents' Survey fully supporting Headcorn Neighbourhood Plan's Vision and 96.4% of respondents to the Regulation 14 Consultation fully or partially supporting the Neighbourhood Plan as a whole (NPPF paragraph 29);
- Making a decision to exempt strategic allocations within an adopted Local Plan from certain key policy requirements in relation to issues such as the siting of development, to ensure that the Neighbourhood Plan will: not be in conflict with strategic allocation policies contained in the Maidstone Local Plan (including the emerging Local Plan, once adopted); support the spatial development strategies for Maidstone; not promote less development than set out in the strategic policies for the area; and that Headcorn will meet the housing requirement figure set out in the adopted Local Plan (NPPF Paragraphs 13, 29 and 67);
- Setting out clear policies covering design, siting and landscaping, connectivity and access, infrastructure, new dwellings and supporting the local economy to ensure Headcorn's Neighbourhood Plan will shape and direct any development within the Parish, particularly outside strategic allocation policies (NPPF paragraph 13);
- Ensuring that Headcorn's Neighbourhood Plan will help to deliver the three objectives underpinning sustainable development (NPPF paragraphs 8 and 11). See the discussion in Section 4 below; and
- Ensuring that Headcorn Neighbourhood Plan policies "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)" (NPPF paragraph 16(f)).

### **3.i.a National Planning Policy for Traveller Sites**

**3.8** Headcorn Parish contains a high share of gypsy and traveller developments, with caravans or other mobile or temporary structures accounting for 3.0% of the housing stock in Headcorn Parish in 2021, compared to 1.2% in Maidstone Borough as a whole and 0.4% in England.<sup>5</sup> Therefore, for Headcorn's Neighbourhood Plan to be adopted it must also have regard to the national policies covering gypsy and traveller sites, which are set out in the policy document "Planning Policy for traveller sites".<sup>6</sup>

**3.9** The national planning policy for traveller sites sets out the planning objectives associated with traveller sites, as well as the approach that Local Plans should take. It does not specifically cover neighbourhood plans.

**3.10** In developing its approach to planning policy for gypsy and traveller sites, Headcorn Parish Council considered a variety of issues including: the considerable tension between the settled and traveller communities that has arisen in large part as a result of a

---

<sup>5</sup> 2021 Census data.

<sup>6</sup> Department for Communities and Local Government (2015) "Planning Policy for traveler sites", August 2015, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf).

significant amount of unauthorised development in the countryside, including highly concentrated developments in open countryside; evidence of landscape and environmental harm as a result of unauthorised development; and the failure to properly take into account flooding, including surface water flooding issues that have been exacerbated by the addition of hard standing associated with unauthorised development.

**3.11** Headcorn's Neighbourhood Plan does not look to allocate sites, either for the settled or gypsy and traveller community, and instead relies on strategic allocations within the Local Plan to meet any assessed need in Headcorn. Therefore the focus of its Neighbourhood Plan policies is to determine factors such as: design; siting and landscaping (including dealing with flooding); connectivity and access; infrastructure (particularly parking and water and sewerage provision); the location of new dwellings; and supporting business development. Headcorn Parish Council considers that these factors are equally relevant to the settled and gypsy and traveller communities.

**3.12** Headcorn Parish Council therefore decided to apply its Neighbourhood Plan policies to both communities. Headcorn Parish Council considers that this will achieve three goals:

- it will help create a sense of fairness, which will help reduce tensions between the two communities;
- it will avoid landscape and environmental harm, by applying policies consistently; and
- it will avoid unnecessary duplication, as the justification for the provisions in Headcorn's Neighbourhood Plan policies apply equally to both communities, meaning having a separate gypsy and traveller policy would simply duplicate the provisions for the settled community.

**3.13** In deciding on this approach, Headcorn Parish Council had regard for national policy by:

- ensuring that its Neighbourhood Plan would avoid unnecessary duplication (in line with NPPF paragraph 16(f));
- using the definition of gypsies and travellers set out in Annex 1 of Planning Policy for traveller sites;
- aiming to reduce the number of unauthorised developments, by setting clear expectations of the types of development that will be acceptable;
- seeking to reduce tensions between the settled and traveller communities;
- giving proper consideration to local environmental quality;
- avoiding placing undue pressure on local infrastructure;
- avoiding locating sites in areas at high risk of flooding;
- ensuring that the scale of development will not dominate the surrounding community;
- ensuring that any business development associated with mixed use sites will have regard to the safety and amenity of neighbouring residents;
- limiting the number of sites in open countryside;
- ensuring that sites will be well planned, with soft landscaping to enhance the environment; and

- ensuring sites will not be enclosed by hard landscaping or high walls and fencing.

### **3.i.b National Planning Policy Guidance**

**3.14** National Planning Policy Guidance is relevant for Neighbourhood Plans, because it supplements the relevant legislation, as well as the NPPF, by providing more detail on the legislative and policy requirements underpinning Neighbourhood Plans. Headcorn Parish Council has had regard for National Planning Policy Guidance in preparing its Neighbourhood Plan, including guidance on:

- Preparing and submitting a Neighbourhood Plan, including in relation to the preparation of this consultation statement;<sup>7</sup>
- The Community Infrastructure Levy, to check what Parish Councils are entitled to spend any CIL receipts on;<sup>8</sup>
- Design, to ensure Headcorn’s approach would be consistent;<sup>9</sup>
- Biodiversity Net Gain, to check the requirements;<sup>10</sup>
- Flood risk, including the sequential and exception tests, to ensure Headcorn’s approach would be consistent;<sup>11</sup>
- First Homes, to check the definition and purpose;<sup>12</sup> and
- Supporting the provision of affordable housing to buy, including through varying the types of affordable housing expected, to confirm that this is allowable under the guidance (Paragraph: 100 Reference ID: 41-100-20190509).

### **3.ii National policy and HNP1: Design and Design Guidance**

**3.15** The Design policy for Headcorn (HNP1) is supported by Design Guidance and sets the overall framework governing the look and feel of developments in Headcorn, and rules to ensure that new developments will be good neighbours. Therefore, for Policy HNP6 to meet the basic condition of having regard for national policies, it needs to be judged against the relevant sections of the NPPF, which are: Sections 12 and 16.

**3.16** As set out in the National Planning Policy Framework (NPPF), the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. Therefore, all plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.

---

<sup>7</sup> <https://www.gov.uk/guidance/neighbourhood-planning--2>

<sup>8</sup> <https://www.gov.uk/guidance/community-infrastructure-levy#spending-the-levy>

<sup>9</sup> <https://www.gov.uk/guidance/design>

<sup>10</sup> <https://www.gov.uk/guidance/biodiversity-net-gain>

<sup>11</sup> <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

<sup>12</sup> <https://www.gov.uk/guidance/first-homes>

**3.17** Headcorn's Neighbourhood Plan has regard for national policy by seeking to:

- create well-designed buildings, which will stand the test of time and be desirable both now and in the future;
- preserve and enhance Headcorn's distinctive heritage and character; and
- create development that is in keeping with Headcorn's position as a rural village; contributing to a high-quality built environment; providing sensitive landscaping; and reflecting its setting within the Parish.

**3.18** HNP1 and the associated Design Guidance have regard for national policy by: setting out clear design expectations to support the creation of high quality and beautiful buildings and places (131); being supported by input from the local community, through the extensive use of Residents Surveys and other forms of consultation (132); reflecting the local character and preferences (133 and 134); being sympathetic to local character and history and seeking to maintain Headcorn's strong sense of place (135 and Section 16); and seeking to ensure signage is in keeping with Headcorn's rural setting (141).

### **3.iii National policy and HNP2: Siting, Landscaping and protecting the natural and historic environment and setting**

**3.19** HNP2 is the policy on siting, landscaping and protecting the natural and historic environment and setting, which sets the rules to determine how developments sit within the landscape, as well as rules around flood risk. Therefore, for Policy HNP6 to meet the basic condition of having regard for national policies, it needs to be judged against the relevant sections of the NPPF, which are Sections 14, 15 and 16 and Paragraphs 84, 102-103, 123-124 and 135-136.

**3.20** HNP2 Part 1 seeks to ensure that development will respect the setting of any listed building, or other buildings that contribute to the character of the countryside and sensitively incorporates historic features within the site. This has regard for NPPF Section 16 and in particular that: policies should be sympathetic to local character and history (135(c)); historic assets, including those of local historic value, are irreplaceable and should be conserved in an appropriate manner (195); strategies need to take into account opportunities to draw on the contribution made by the historic environment to the character of a place (196); development in the setting of a heritage asset can lead to harm or loss of the asset and should be only allowed in exceptional circumstances for key assets (206); and the effect on non-designated heritage assets should also be considered (209).

**3.21** Policy HNP2 Part 3 starts from the presumption that open spaces, sports and recreational spaces should not be built on, and sets conditions for the circumstances in which development would be allowed, including replacement by equivalent or better provision. It also looks to enhance existing green spaces. This has regard for national policy, set out in NPPF paragraphs 102-103, by recognising the importance of high quality open spaces and seeking to ensure they are not built on, unless they would be replaced by equivalent or better provision.

**3.22** HNP2 Part 4 seeks to respect natural contours and sensitively incorporate natural features such as trees, hedges and ponds. HNP2 Part 5 looks to maintain and enhance wildlife corridors and stepping stones. HNP2 Part 7 seeks to ensure developments are sensitively landscaped making good use of trees (including fruit trees). HNP2 Part 8 seeks to ensure landscape buffers will help create and enhance wildlife corridors. These policies have regard to the need for plans to: safeguard and improve the environment (123); achieve net environmental gains through supporting habitat creation (124(a)); recognise the importance of trees and ensure that existing trees are retained where possible (136); seek to safeguard wildlife corridors and stepping stones (185(a)); and avoid the loss of veteran trees (186(c)).

**3.23** HNP2 Part 6 seeks to ensure that development will deliver a biodiversity net gain in line with national targets, and where it is not possible to achieve this onsite, sets the rules for offsite mitigation measures. This has regard to the need to: take into account biodiversity (158); provide net gains for biodiversity (180(d)); protect and enhance biodiversity (185); and ensure there is adequate mitigation where harm to biodiversity cannot be avoided (186).

**3.24** HNP2 Part 10 seeks to avoid harm to local rivers and streams. These include (and feed into) the River Beult, which is a Site of Special Scientific Interest (SSSI). This policy has regard to the need to: ensure that development should not normally be permitted where it will have an adverse effect on an SSSI (186(b)), as well as to promote the conservation, restoration and enhancement of priority habitats (185).

**3.25** HNP2 Parts 11-13 aim to ensure that: development does not take place in the areas at highest risk of flooding; the sequential and exception tests set out in the NPPF are followed; flooding and surface water run-off from sites will be dealt with in a way that will not increase the risk of flooding elsewhere; and drainage provision will be adequate and will include clearly identified responsibilities for maintenance. The approach set out in these parts of HNP2 has regard for national policy, including Paragraphs 165-175 and Annex 3. In particular, paragraph 165 of the NPPF states that "*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at the highest risk (whether existing or future)*" and HNP2 Part 11 achieves this.

**3.26** HNP2 Parts 14 and 15 aims to ensure that development in the countryside will reflect the established pattern of development and avoid more isolated parts of the Parish. This policy approach has regard to NPPF paragraph 84, which seeks to avoid the development of isolated homes in the countryside.

### **3.iv National policy and HNP3: Connectivity and access**

**3.27** Policy HNP3 covers connectivity and access and is designed to ensure that developments are safe and well-connected, and recognise particular constraints in Headcorn. Therefore, for Policy HNP6 to meet the basic condition of having regard to national policies, it needs to be judged against the relevant sections of the NPPF, which are Section 9, together with paragraphs 34 and 96.



**3.28** HNP3, particularly in Parts 1 and 9, looks to create safe and well connected developments that are easily accessed by foot or cycle. This has regard to NPPF paragraph 96, which aims to ensure street layouts allow for easy pedestrian and cycle connections, with clear and legible pedestrian and cycle routes and layouts that encourage walking and cycling. NPPF Section 9 (particularly paragraph 108(c)) has a similar focus, setting out that plan-making should consider opportunities to promote walking and cycling, meaning that HNP3 also has regard to this section of national policy.

**3.29** HNP3 also sets out policies to manage the layout of developments to ensure that the connectivity and access arrangements will be designed in a way to take account of opportunities to enhance road safety; will not cause or exacerbate traffic problems; will avoid creating harmful rat runs; and will avoid the appearance of ribbon development. These policy requirements will help ensure that the pattern of movement, streets and other transport considerations will contribute to the making of high quality places, in line with paragraph 108(d). These policies will also help support the consideration of the transport aspects of development proposals, and therefore have regard to NPPF paragraphs 114 and 116 in particular.

**3.30** HNP3 does not explicitly consider opportunities to promote the use of public transport. Nonetheless, the Headcorn Neighbourhood Plan has considered this issue from the earliest stages of plan-making, meaning it has had regard to national policy. Headcorn village does benefit from a train station, with links to London and other parts of Kent, as well as an irregular bus service between Maidstone and Tenterden. However, the size of the village (even after the proposed development within the adopted and emerging Local Plans) means that further expansion of the public transport network, for example to serve individual developments, is unlikely to be economically viable. Therefore, Headcorn's Neighbourhood Plan has not included a specific requirement for development to promote public transport links, as doing so would not be feasible and would be contrary to the need to ensure proposals do not undermine the deliverability of the plan (NPPF paragraph 34). Requiring the promotion of public transport links would therefore also be contrary to NPPF paragraph 115, which sets out that development should not be prevented or refused on highway grounds unless there would be an unacceptable impact on highway safety, or the cumulative impact would be severe. However, by ensuring that developments will be well connected to Headcorn High Street (HNP3 Part 1), Headcorn's Neighbourhood Plan will also support links to the public transport network, as the High Street has a both stop in both directions.

### **3.v National policy and HNP4: Infrastructure provision**

**3.31** Policy HNP4 on infrastructure provision sets the rules to ensure that specific types of infrastructure provision such as parking, broadband, water and sewerage, and promoting energy efficiency will meet the needs of local residents both now and in the future, as well as to set the priorities for infrastructure in Headcorn, reflecting local constraints. Therefore, for Policy HNP4 to meet the basic condition of having regard to national policies, it needs to be judged against the relevant sections of the NPPF, which are Paragraphs: 20, 34, 111-112, 118, 158, 160 and 180.

**3.32** Policy HNP4 Part A covers parking, including: the need to ensure developments are supported by adequate parking provision including minimum parking standards reflecting local car ownership levels, which has regard to NPPF paragraphs 111-112; as well as supporting greater adoption of electric vehicles (111(e)).

**3.33** HNP4 Part B covers broadband provision and has regard to NPPF paragraph 118 and the need to support the expansion of full fibre broadband connections from a range of providers that can be upgraded over time.

**3.34** HNP4 Part C covers water and sewerage management and has regard to NPPF paragraph 158 on the need to mitigate and adapt to climate change, specifically in relation to the water supply, as well as NPPF paragraph 180 on the need to prevent development from contributing to pollution.

**3.35** HNP4 Part D covers promoting energy efficiency and has regard to NPPF paragraph 160 on the need to provide a positive strategy for the use of renewable and low carbon energy.

**3.36** HNP4 Part E covers the priorities for infrastructure spending in Headcorn and how demands will be prioritised where there are competing demands for developer contributions. HNP4 Part E has regard to NPPF paragraph 34 on the need for plans to set out the contributions to infrastructure required in a way that will not undermine the deliverability of the plan. Although strictly speaking NPPF paragraph 20(b) only applies to strategic policies (and Neighbourhood Plan policies are deemed to be non-strategic), the approach taken in HNP4 Part E is compatible with the requirement in 20(b) for plans to make sufficient provision for infrastructure.

### **3.vi National policy and HNP5: New dwellings**

**3.37** Policy HNP5 on new dwellings covers both housing and gypsy and traveller pitches. This policy addresses issues such as where different types of development can be located, and what the mix of provision should be in larger developments. Therefore, for Policy HNP5 to meet the basic condition of having regard to national policies, it needs to be judged against the relevant sections of the NPPF, which are Paragraphs: 63, 64-66, 67, 70-71, 82-84, 96, 102, 128-130, and 135.

**3.38** The NPPF sets out the housing need requirements for neighbourhood areas and how these should be provided as part of the strategic policies for a local plan (67) and that these figures should not need retesting as part of a neighbourhood plan examination. The Maidstone Borough Local Plan sets out the housing requirement for Headcorn within its policy on Headcorn as a Rural Service Centre (SP7 in the 2017 adopted Local Plan). This housing requirement will be entirely delivered through the strategic allocations within the Local Plan. Headcorn's Neighbourhood Plan has regard to national policy, including the requirement not to deliver less development than set out in the adopted Local Plan, by ensuring strategic allocations are excluded from relevant parts of HNP5 that otherwise aim to manage the size and location of developments.

**3.39** HNP5 Part I.2 covers the density of residential developments and has regard to NPPF paragraphs 128-130 and 135. Specifically, the policy has been set: taking into account the desirability of maintaining Headcorn's prevailing character and setting (128(d)); based on an area-based character assessment of Headcorn village (129); in a way that allows for a significant uplift (roughly doubling) in the existing density within the village (129(a)); using a density range (129(b)); based on a consideration that significant uplifts in average density may be inappropriate if it would be wholly out of character with the existing area (130), which applies to urban areas, but should also be relevant to rural villages such as Headcorn; and in a way that ensures that it does not prevent or discourage appropriate innovation or change (135) by allowing higher densities if it can be demonstrated that this will not undermine the landscape quality.

**3.40** HNP5 Part I.3 seeks to ensure that development will primarily be located within the village boundary, or immediately abutting the boundary. The relevant NPPF policies on rural housing developments, including housing in villages such as Headcorn, are NPPF paragraphs 82-84. HNP5 Part I.3 has regard for the NPPF policy, by seeking to ensure that housing in Headcorn Parish will be located where it will enhance the vitality of the village and allow it to grow and thrive (83). HNP5 Part I.3.i explicitly refers to the exceptions for developments of more isolated homes in the countryside set out in paragraph 84, meaning it has regard to that policy. HNP5 Part I.3.ii also explicitly excludes developments allowed under permitted development rules, which are set as part of national policy.

**3.41** HNP5 Part I.3.iii also allows for community self-build projects in the countryside of Headcorn Parish. This has regard to paragraph 82, which seeks to support proposals for community-led development, as well as support for self-build as set out in paragraph 63. It also has regard to NPPF paragraph 70(b) which sets out that plans should seek opportunities to support small sites to come forward for community-led development for housing and self-build and custom-build housing.

**3.42** HNP5 Part II.3 looks to ensure that major developments (of ten or more dwellings) provide communal open and recreational spaces within developments. This has regard to NPPF paragraph 102, which sets out that access to high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

**3.43** HNP5 Part II.6, as well as Parts II.2, II.4 and II.5, seek to create mixed developments that will cater for the needs of different groups. The approach taken has regard to NPPF paragraph 96(a) which seeks to promote social interaction and opportunities for meetings between people who might not otherwise come into contact with each other. It also has regard to NPPF paragraph 63 on establishing the housing of different groups.

**3.44** HNP5 Part II.5 on affordable housing has regard to NPPF paragraphs 64-66. Specifically it: sets out the type of affordable housing required (64); ensures that the affordable housing policy only applies to major developments (65); is based on evidence on the types of affordable homes that will meet the needs of Headcorn's community to ensure it won't exceed the level of demand (66); and ensures that at least 10% of the total number

of homes will be available for affordable home ownership (66), as it sets a target that 20% of all homes (50% of the Maidstone Local Plan's affordable homes target) will be affordable homes to buy. It also uses the broad definition of affordable homes to buy set out in NPPF Annex 2.

**3.45** HNP5 Part III seeks to promote small scale development, setting a maximum of 25 dwellings in developments outside strategic allocations. Although Headcorn Neighbourhood Plan does not seek to allocate sites, the approach taken has regard to national policy set out in NPPF paragraphs 70-71, which recognises the important contribution that small and medium sized sites can make, including supporting the development of windfall sites (70(d)).

### **3.vii National policy and HNP6: The economy**

**3.46** Policy HNP6 on the economy covers the rules governing all business development, as well as specific rules designed to support the success of Headcorn High Street, and rules governing any future development of the Headcorn aerodrome and commercial energy generation. Therefore, for Policy HNP6 to meet the basic condition of having regard to national policies, it needs to be judged against the relevant sections of the NPPF, which are Paragraphs: 88-89, 94-95, 110(f) and 160.

**3.47** Headcorn Neighbourhood Plan policy HNP6 Parts 1-5 has regard to NPPF paragraphs 88-89 on supporting a prosperous rural economy. Policy HNP6 applies to all business development, in line with NPPF paragraph 88(a) which looks to ensure the expansion of all types of business. Policy HNP6 Part 1 focuses on the conversion of existing building (NPPF paragraph 88(a)). Policy HNP6 Part 5 ensures that proposals will comply with other policies within Headcorn's Neighbourhood Plan, including Headcorn's Design policy (HNP1), which will help ensure the requirement in NPPF paragraph 88(a) for new buildings to be beautiful. The application of Headcorn's Policy on connectivity and access (HNP3) to business development through HNP6 Part 5 should ensure that (as per NPPF paragraph 89) business development: will not have an unacceptable impact on local roads; will create safe, well connected developments that can be easily accessed by foot and cycle; is sensitive to its surroundings; and will take advantage of opportunities to enhance road safety.

**3.48** Headcorn Neighbourhood Plan Policy HNP6 Part A, covering Headcorn High Street, has regard to national policy (NPPF paragraphs 88(d), 94(b), and 95) by seeking to retain and develop local shops by: ensuring the vitality and viability of the High Street is not undermined by potential development; and that the ground floor of existing commercial and retail buildings within the Conservation Area (which encompasses Headcorn High Street) will not be allowed to switch to residential use to help maintain Headcorn High Street as the commercial centre of the village.

**3.49** Headcorn Neighbourhood Plan Policy HNP6 Part B, covering Headcorn Aerodrome, has regard to the aims national policy (NPPF paragraphs 88(c) and 110(f)) by seeking to ensure that the Headcorn Aerodrome expands in a way that will support tourism and be in keeping with its rural setting.

**3.50** Headcorn Neighbourhood Plan Policy HNP6 Part C, covering commercial energy generation, has regard to the aims national policy (NPPF paragraph 160(a)) by seeking to ensure that commercial energy generation in Headcorn appropriately addresses landscape and visual impacts.

## 4. CONTRIBUTES TO THE ACHIEVEMENT OF SUSTAINABLE DEVELOPMENT

**4.1** As set out in Section 6, Headcorn Parish Council has been advised by Maidstone Borough Council that a formal Strategic Environmental Assessment and a formal Habitats Regulation Assessment Screening were not needed in the case of Headcorn's Neighbourhood Plan.<sup>13</sup>

**4.2** However, for any Neighbourhood Plan to be adopted it must contribute to the achievement of sustainable development. The definition of sustainability relevant to Neighbourhood Plans is set out in paragraph 8 of the NPPF, namely that:

*"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

**4.3** The NPPF also sets out in paragraph 11 that there should be a presumption in favour of sustainable development, which for plan-making means that:

*"all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"<sup>14</sup>*

**4.4** The basic condition on sustainable development reflects the planning principle that all plan-making should help to achieve sustainable development. Therefore to meet the

---

<sup>13</sup> This advice is based on the emerging policies in Headcorn's Neighbourhood Plan, and on Maidstone Borough Council's discussions with the statutory consultees.

<sup>14</sup> Only part (a) of NPPF paragraph 11 applies to plan-making for Neighbourhood Plans, as policies within Neighbourhood Plans are not considered to be "strategic" in planning policy terms.

condition, a qualifying body needs to demonstrate how its plan will contribute to improvements in environmental, economic and social conditions and how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures). Sufficient and proportionate evidence should be presented on how the draft neighbourhood plan guides development to sustainable solutions.<sup>15</sup>

**4.5** There is no legal requirement for a neighbourhood plan to have a sustainability appraisal. However, considerations of sustainability have informed every stage of the development of Headcorn's Neighbourhood Plan. Early work on the Plan was informed by analysis conducted on the sustainability of housing development in Headcorn.<sup>16</sup> This analysis considered the potential challenges posed by Headcorn's location, because of the negative impacts of distance, cost and time on sustainability. The Plan development was also informed by a sustainability appraisal of possible development sites in Headcorn.<sup>17</sup> To ensure that Headcorn's Neighbourhood Plan will contribute to sustainable development, Headcorn Parish Council has used the understanding gained from this analysis, together with the evidence gathered from residents and businesses operating in the Parish; evidence supporting Maidstone's Local Plan, including its Sustainability Appraisal; and evidence from national sources.

**4.6** Taken together, Headcorn Parish Council considers that Headcorn's Neighbourhood Plan: contributes to the achievement of sustainable development; is consistent with the economic, social and environmental objectives; and is based on an approach to plan-making that is aligned with the requirements set out in paragraph 11(a) of the NPPF. How Headcorn's Neighbourhood Plan meets these objectives is set out below.

#### **4.i The Economic Objective**

**4.7** The economic objective sets out that plans should help to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity, and by identifying and coordinating the provision of infrastructure.

**4.8** Headcorn's approach to achieving the economic objective has been informed by its position relative to large employment and population centres. The village of Headcorn is over 10km from all the major population centres in Kent, see HNP Policy Map 3. Therefore, in geographic terms, Headcorn is relatively far from all the major employment centres - almost 50% of workers in England travel at most 5km to work and almost 70% travel at

---

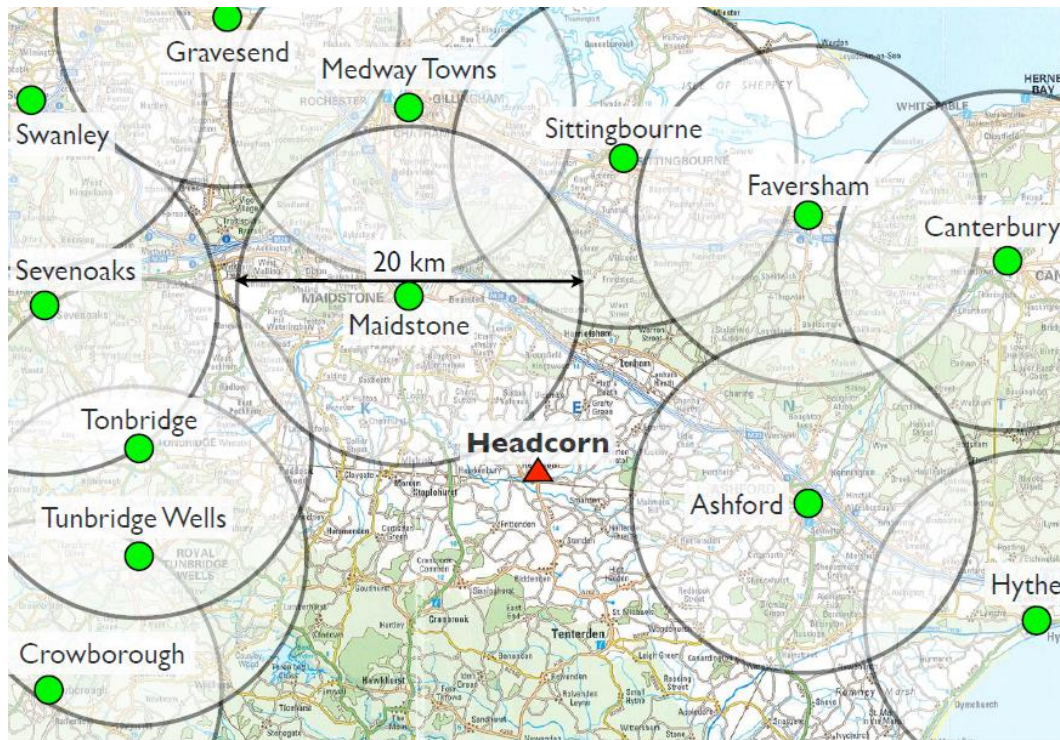
<sup>15</sup> See National Planning Policy Guidance Paragraph: 072 Reference ID: 41-072-20190509.

<sup>16</sup> See Driver (2014) "Analysing the sustainability of housing development in Headcorn: How much development would be sustainable?", Analytically Driven Ltd, [http://www.analytically-driven.com/uploads/2/7/8/1/27818525/sustainability\\_of\\_housing\\_development\\_in\\_headcorn\\_-\\_background\\_report\\_to\\_support\\_the\\_neighbourhood\\_plan\\_-\\_final\\_draft\\_-\\_december\\_2014.pdf](http://www.analytically-driven.com/uploads/2/7/8/1/27818525/sustainability_of_housing_development_in_headcorn_-_background_report_to_support_the_neighbourhood_plan_-_final_draft_-_december_2014.pdf).

<sup>17</sup> Therivel, R. (2015) "Sustainability appraisal of possible strategic development sites in Headcorn", Levett-Therivel, Headcorn Parish Council, (<http://www.headcornpc.kentparishes.gov.uk>).

most 10km to work, but Headcorn is 15.9km from Maidstone, the nearest population and employment centre.<sup>18</sup>

## HNP Policy Map 2: Headcorn's position relative to local urban centres



**Note:** Each of the employment and population centres surrounding Headcorn (defined as having a population of at least 10,000) is marked with a green dot and the surrounding rings mark the 10km radius that would be within a normal commuting range for the majority of workers. As it can be seen, Headcorn is relatively far away from all the key surrounding employment centres. Headcorn is a 15.9km drive from the closest employment centre, Maidstone. Calculations based on the 2021 Census results for all workers in England travelling to a fixed workplace show roughly 44% of commuters lived within 5km of their workplace and around 65% lived within 10km of their workplace. For Maidstone Borough as a whole, 27.3% and 58.9% of workers travelling to work lived within 5km and 10km of their workplace respectively. In the case of Headcorn Parish only 16.5% of workers travelling to work in 2021 lived within 5km of their workplace, and only 31.5% of workers lived within 10km of their workplace.

**4.9** Headcorn's location means that commuting times, distances and costs are all significantly above the national average. For example, Headcorn is at least a 30-minute drive from the nearest population centre of at least 10,000 people, which is significantly higher than average commuting times in England.<sup>19</sup> Headcorn does benefit from a direct rail link to London. However, there is no direct rail link from Headcorn to Maidstone, which is the closest population centre, with only an irregular bus service between Maidstone and Tenterden that stops in Headcorn. Compared to average commuting times in England of 24.5 minutes, travel times from Headcorn by public transport to any of the main employment centres are mostly significantly above average.<sup>20</sup> For example, journeys to

<sup>18</sup> The 2021 Census recorded that in total for England 43.7% of workers with a fixed workplace travel at most 5km to work, with 65.4% travelling at most 10km. Therefore, compared to the experiences of the vast majority of workers, 15.9km (the distance between Maidstone and Headcorn) would not be considered close to work.

<sup>19</sup> England does not have a definition of 'remote', but Headcorn would qualify as remote under the definition of remote used by the Scottish government and both the travel times and distances between Headcorn and major population centres are significantly above average commuting times and distances. See the discussion of the implications of this for sustainability in Driver (2014).

<sup>20</sup> Manning and Petrongolo (2017), based on Labour Force Survey data for 1993-2007.



London by train from Headcorn take between 55 minutes to reach London Bridge Station and roughly an hour and ten minutes to reach Charing Cross station. It also takes around 40 minutes to reach the centre of Maidstone by bus from Headcorn. This may explain why the 2021 Census showed that a higher proportion of commuters in Headcorn drove a car or van to work (77.5%) compared to Maidstone as a whole (72.7%), or indeed England (65.0%) and the South East (68.9%).

**4.10** The emphasis in Headcorn’s Neighbourhood Plan is therefore on maximising local opportunities and supporting the needs of local people and businesses, including ensuring that growth and infrastructure provision will be aligned. Despite, or possibly because of, its relative distance from local centres, Headcorn benefits from a range of good services, including: a popular primary school; a doctor’s surgery; three dentists; a Village Hall; a library; a variety of shops, restaurants, pubs and cafes; and several churches. Headcorn High Street is at the heart of this activity and is an important part of village life.

**4.11** The policies in Headcorn’s Neighbourhood Plan support the economic objective by:

- Seeking to manage flood risk, to reduce the risk of investments being destroyed (**HNP2**).
- Ensuring that connectivity and access for new developments is effective (**HNP3**), by:
  - avoiding creating or exacerbating traffic problems that might discourage potential customers; and
  - ensuring that opportunities are maximised to enhance links to Headcorn High Street at the heart of the village.
- Ensuring that development is supported by adequate infrastructure, and that existing infrastructure will not be undermined (**HNP4**) by:
  - Ensuring that parking facilities that support the High Street and key services such as the railway station or Doctor’s surgery will not be lost;
  - Ensuring that new developments will be supported by high-performance broadband, which will help support home working; and
  - Ensuring that any infrastructure provided in Headcorn will reflect Headcorn specific needs and will therefore deliver locally.
- Ensuring that business development in Headcorn will be supported by clear rules that support the success of Headcorn’s economy as a whole (**HNP6**) and that:
  - The role of Headcorn’s High Street is promoted to ensure its continued success, so that:
    - its vitality and viability will not be undermined; and
    - the ground floor of properties in retail or business use classes within the Conservation Area (which encompasses Headcorn High Street) will be retained for business use (**HNP6.A**).
  - The role of the Headcorn Aerodrome as a key site for tourist and aviation use is recognised, but ensuring that future development at the site balances the needs of the Aerodrome with the needs of residents and other businesses (**HNP6.B**); and

- The siting and landscaping of potential commercial energy generation in Headcorn will be achieved in a way that does not undermine the viability of other businesses, such as those relying on tourism (**HNP6.C**).

**4.12** Headcorn Parish Council considers that its Neighbourhood Plan meets the economic objective, and is an appropriate approach for a rural economy, balancing the needs of different groups and ensuring effective infrastructure provision.

#### **4.ii The Social objective**

**4.13** The social objective sets out that plans should support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

**4.14** The same considerations that informed Headcorn Parish Council's approach to the economic objective also informed its approach to the social objective. In other words, Headcorn's relative distance from economic and population centres needs to be factored into policy proposals, in order to ensure they will be sustainable. The emphasis in Headcorn's Neighbourhood Plan is therefore on maximising local opportunities and supporting the needs of local residents and businesses, including the needs and preferences identified through surveys of residents and businesses. This includes preferences for a gradual, more sustainable expansion of the village, to meet the needs of residents and emerging households more effectively and to maintain Headcorn's sense of community by ensuring new residents will be more easily absorbed into village life. This evidence has also informed the approach to infrastructure provision, to ensure that any expansion of the village will be supported by effective infrastructure.

**4.15** The policies in Headcorn's Neighbourhood Plan support the social objective by:

- Ensuring that buildings are well designed, help support Headcorn's sense of place and preserve its cultural identity, are supported by high quality exterior spaces and ensure that new developments will be good neighbours to existing residents by safeguarding privacy and daylight and managing potential sources of pollution (**HNP1 and Design Guidance**).
- Ensuring the needs of existing and future residents are supported by effective policies on siting and landscaping (**HNP2**) so that:
  - Distinctive views enjoyed by residents are preserved;
  - Public green spaces and recreational spaces are retained and enhanced;
  - Flood risk is managed effectively, in order to avoid creating risks for existing and future residents; and
  - Development is concentrated in and around the village to help reinforce the village community and avoid creating isolated dwellings.
- Ensuring that connectivity and access policies manage traffic problems effectively and create safe, well connected developments (**HNP3**).

- Ensuring that infrastructure provision will support the needs of residents (**HNP4**) by:
  - prioritising options where Headcorn’s existing infrastructure provision needs improvement, or where capacity issues mean new development could cause issues;
  - recognising that Headcorn’s rural location means that parking provision needs to be adequate, as residents will need cars to access key services and employment options;
  - ensuring that broadband provision is adequate, to support home working;
  - addressing capacity issues with water and sewerage provision; and
  - ensuring that new buildings will be energy efficient.
- Ensuring that new dwellings will meet the needs of current and future residents (**HNP5**) by:
  - Creating effective and attractive garden spaces;
  - Ensuring new developments will be visually appealing;
  - Ensuring that new developments support the community by providing communal open and recreational spaces, and that where these cannot be provided onsite, alternative land within the Parish will be provided;
  - Ensuring developments include housing designed to meet the needs of the elderly and those with disabilities and that developments will be designed to cater for a mix of age groups and abilities to foster healthy communities;
  - Ensuring that affordable housing provision prioritises a higher share of affordable housing to buy than would be provided under the Local Plan, in order to:
    - better meet the needs of emerging households in Headcorn; and
    - account for the difficulties that new residents of affordable rented housing in Headcorn have, if they have no links to the community, as distance, time and cost make it hard for them to access the services they need, their support networks of friends and family, or any job opportunities, potentially creating deprivation; and
  - Ensuring that (outside strategic allocations within the Local Plan) housing developments are small scale (a maximum of 25 houses), as small scale developments are easier to absorb into village life and help support the village feel that is seen as a significant benefit by local residents.
- Ensuring the policy on economic development supports the important role of Headcorn High Street in village life (**HNP6**).

**4.16** Headcorn Parish Council considers that its Neighbourhood Plan meets the social objective, and is an appropriate approach for a rural village community, balancing the needs of different groups and ensuring effective infrastructure provision.

#### **4.iii The Environmental Objective**

**4.17** The environmental objective sets out that plans should protect and enhance our natural, built and historic environment; including making effective use of land, improving

biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

**4.18** Factors such as the impact of distance on sustainability form a key part of the strategy underpinning Heacorn's Neighbourhood Plan with respect to the economic and social objectives. In the case of the environmental objective, the approach has been informed by strong preferences amongst residents to protect and enhance Headcorn's natural and historic environment, in keeping with both its history and its rural setting. Headcorn Parish also includes part of the River Beult Site of Special Scientific Interest (SSSI) and this has also informed the approach taken. Headcorn's Neighbourhood Plan seeks to meet the environmental objective by:

- Promoting well designed buildings that are sympathetic to the setting of heritage assets and that trees and hedgerows are retained (**HNP1 and Design Guidance**).
- Ensuring there are effective policies governing the siting and landscaping of development (**HNP2**), so that:
  - Heritage assets are protected;
  - The natural contours of sites are respected and natural features such as trees, hedgerows and ponds are sensitively incorporated;
  - Wildlife corridors and stepping stones are maintained and enhanced;
  - Biodiversity net gain is achieved, focusing on native flora and fauna. The policy sets out that delivery should be within the Parish, in recognition of the fact that local residents will benefit most through that, helping to offset the costs of development incurred by existing residents (such as increased congestion and capacity issues for key services);
  - Development will not damage local streams and rivers;
  - There will be an effective approach to dealing with flooding and surface water run-off, to help manage the risks for new and existing developments; and
  - Isolated developments in the countryside are avoided, to help preserve Headcorn's rural character and minimise factors such as light pollution that might impact wildlife.
- Promoting access from developments to Headcorn High Street by foot and cycle (**HNP3**).
- Ensuring there is adequate infrastructure provision (**HNP4**) so that:
  - New developments will help support the adoption of electric vehicles through the provision of adequate charging facilities;
  - Broadband provision will support homeworking;
  - Water and sewerage management will be effective:
    - supporting initiatives such as rainwater harvesting; and
    - ensuring that the sewerage system, including the Headcorn Waste Water Treatment Works can cope with demand, to avoid creating damage to local rivers, including the River Beult SSSI;
  - New developments will contribute to energy generation and support energy efficiency; and

- Priorities for infrastructure provision include open spaces, including open spaces supporting local wildlife.
- Ensuring that housing developments within Headcorn village will support higher housing densities (up to roughly double the existing housing density of the built up area of the village), but will do so in a way that still supports Headcorn’s sense of place as a rural village (**HNP5**).
- Ensuring that economic development within Headcorn Parish does not result in unacceptable levels of light, noise, air, ground or water pollution (**HNP6**).

**4.19** Headcorn Parish Council considers that its Neighbourhood Plan meets the environmental objective, and is an appropriate approach for a rural village community, balancing the needs of local residents and businesses and the need to protect and enhance the local natural, built and historic environment.

## 5. GENERAL CONFORMITY WITH THE STRATEGIC POLICIES CONTAINED IN THE DEVELOPMENT PLAN

**UPDATE:** Headcorn Parish Council approved the draft Headcorn Neighbourhood Plan, together with the accompanying documents to be submitted under Regulation 15, at its Full Parish Council meeting on March 13th 2024. At that time it was unclear when the emerging Local Plan Review would be adopted, as the Inspector examining the Maidstone Local Plan Review had only issued their final report on March 8th 2024, full Maidstone Borough Council elections were due in May 2024 and there was no scheduled meeting of Maidstone Borough Council due before then. However, Maidstone Borough Council held an Extraordinary Council Meeting on March 20th 2024 and adopted the new Local Plan Review.

Although it was not a statutory requirement, Headcorn Parish Council had already assessed both the Adopted 2017 Maidstone Local Plan and the emerging Local Plan Review (including the Main Modifications) as part of its assessment of the Basic Conditions, in order to future proof the Basic Conditions Statement. However, the 2024 Adopted Maidstone Borough Local Plan Review contains some changes compared to the emerging Local Plan Review used by Headcorn Parish Council in its assessment of the Basic Conditions. Headcorn Parish Council consulted Maidstone Borough Council about the situation and what it meant for the Neighbourhood Plan examination process. It was agreed that, in the interests of time, providing Headcorn Parish Council was comfortable that its assessment of the Basic Conditions remained valid, it would not be necessary to redraft the Basic Conditions statement. Instead this update should be provided to the Basic Conditions statement to explain the circumstances.

Headcorn Parish Council notes that the list of Strategic Policies in the 2024 Adopted Maidstone Borough Local Plan Review remains the same as the main modifications version and, in general, changes to the drafting of the Strategic Policies are relatively modest. Headcorn Parish Council therefore considers that its assessment of the Basic Conditions remains valid, and can be used for submission under Regulation 15 and to progress to the Regulation 16 public consultation.

**5.1** For any Neighbourhood Plan to be adopted its policies must be in general conformity with the strategic policies contained in the development plan for the local area. The test of general conformity is to assess:

- whether the neighbourhood plan policy supports and upholds the general principle that the strategic policy is concerned with;
- the degree, if any, of conflict between the draft neighbourhood plan policy and the strategic policy;
- whether the draft neighbourhood plan policy proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy;

- the rationale for the approach taken in the draft neighbourhood plan and the evidence to justify that approach.<sup>21</sup>

**5.2** In the case of Headcorn, the need to be in general conformity with the strategic policies contained in the development plan for Headcorn means the strategic policies set out in the Maidstone Borough Local Plan that was adopted in 2017. The strategic policies that in the adopted Local Plan that apply to Headcorn are:

- SS1: Maidstone Borough spatial strategy;
- SP5: Rural Service Centres;
- SP7: Headcorn Rural Service Centre;
- SP17: Countryside;
- SP18: Historic Environment;
- SP19: Housing Mix;
- SP20: Affordable Housing;
- SP21: Economic Development;
- SP22: Retention of employment sites;
- SP23: Sustainable transport;
- H1: Housing site allocations;
- OS1: Open space allocations;
- GT1: Gypsy and Traveller site allocations;
- EMP1: Employment site allocations;
- ID1: Infrastructure delivery; and
- The relevant strategic site allocations that are located in Headcorn Parish, namely H1(35), H1(36), H1(37), H1(38), H1(39), H1(40), GT1(5), GT1(6), OS1(10), OS(11) and EMP1(1).

**5.3** It is not a requirement for Headcorn’s Neighbourhood Plan to be in general conformity with the strategic policies in Maidstone’s Emerging Local Plan. However, given that this Plan is at an advanced stage, this section also sets out how Headcorn’s Neighbourhood Plan compares to the Regulation 19 Draft Maidstone Local Plan. This assessment can only be seen as a preliminary assessment, as the Inspector has not yet issued his report and may require changes, including changes reflecting his most recent Consultation on three exam documents, including the Infrastructure Delivery Plan, which closed on February 14<sup>th</sup> 2024. However, many of the policy proposals under the emerging Local Plan are similar to the adopted 2017 Local Plan, meaning it is likely that the same considerations apply.

**5.4** There is not yet a definitive list of strategic policies associated with the emerging Maidstone Local Plan. However, the Main Modifications consultation in 2023 contained a proposed list under MM109, and the relevant policies for Headcorn were:

- LPRSS1 Maidstone Borough spatial strategy
- LPRSP6 Rural service centres
- LPRSP6(C) Headcorn
- LPRSP9 Development in the countryside

---

<sup>21</sup> See National Planning Policy Guidance Paragraph: 074 Reference ID: 41-074-20140306.

- LPRSP10 Housing delivery
- LPRSP10(A) Housing mix
- LPRSP10(B) Affordable housing
- LPRSP11 Economic development
- LPRSP11(A) Safeguarding existing employment sites and premises
- LPRSP11(B) Creating new employment opportunities
- LPRSP11(C) Town, District and Local centres
- LPRSP12 Sustainable transport
- LPRSP13 Infrastructure delivery
- LPRSP14(A) Natural environment
- LPRSP14(B) The historic environment
- LPRSP14(C) Climate change
- LPRSP15 Principles of good design
- Site Allocations All site allocation policies are strategic policies

**5.5** The sections below set out how Headcorn's Neighbourhood Plan is in general conformity with these policies.

### **5.i General conformity and site allocations**

**5.6** The majority of the policies that apply to Headcorn in the 2017 adopted Local Plan are generic policies that apply to the whole of Maidstone Borough. The exceptions are the relevant site allocations (including open space allocations) and the policy covering Headcorn as a rural service centre (SP7). SP7 sets out the strategic allocations for Headcorn, as well as the amount of housing (423 dwellings) that Headcorn is expected to accommodate over the 2011-2031 period. Headcorn's allocated share of Maidstone Borough's calculated housing need will be entirely met by the strategic housing allocations for Headcorn.

**5.7** All the strategic housing allocations in the adopted Local Plan have been given planning permission and the majority have already been completed. Combined with windfall developments that have been consented within Headcorn, planning permission has been granted for over 500 dwellings. Therefore it is not possible for Headcorn's Neighbourhood Plan to promote less development than set out in the strategic policies for the area. This means the Headcorn Neighbourhood Plan is automatically in general conformity with the site allocations in the adopted 2017 Local Plan.

#### **5.i.a Site allocations and the emerging Local Plan**

**5.8** There is no requirement for a Neighbourhood Plan to be in general conformity with an emerging Local Plan. However, in order to future proof Headcorn's Neighbourhood Plan and avoid any conflicts, where relevant the Neighbourhood Plan sets out a clear distinction between the rules that apply to any allocated sites within an adopted Local Plan and windfall development. In particular:



- Policy HNP2 Parts 14 and 15 on the rules governing the siting of developments within the countryside do not apply to strategic allocations. Headcorn Parish Council considers there are good planning reasons for observing the established development patterns in the countryside (of small clusters of buildings with significant gaps in between), as well as avoiding development in isolated locations. However, such development would not be prevented, if a strategic allocation were to come forward in a future Local Plan that did not meet these rules.
- Policy HNP5 Part I.3 sets out the rules governing the only types of developments of dwellings in the countryside that would be permitted, but again strategic allocations are explicitly exempted from these rules.
- Policy HNP5 Part III explicitly exempts strategic allocations from the maximum number of dwellings of 25 that will apply to windfall development.
- Policy HNP5 Part IV explicitly exempts strategic allocations from the requirement that no major developments (of 10 or more dwellings) will be allowed on sites that are not within, or immediately adjacent to the most up-to-date village boundary in the adopted Local Plan.

**5.9** In addition, on the advice of Maidstone Borough Council, Headcorn Parish Council deliberately chose not to allocate sites within its Neighbourhood Plan, in order to avoid potential conflicts with the existing and emerging Local Plans. Therefore the Headcorn Neighbourhood Plan would be in general conformity with the site allocations in the emerging Local Plan, if that were a requirement, as (once adopted) these allocations would not be blocked by Neighbourhood Plan policies. This also means that Headcorn's Neighbourhood Plan is in general conformity with emerging Local Plan policy LPRSP6(C), covering Headcorn as a Rural Service Centre.

## **5.ii Maidstone Local Plan and HNP1: Design and Design Guidance**

**5.10** The adopted Maidstone Local Plan does not have any overarching strategic policies covering design. All its design policies including DM1, DM2 and DM4 are development management policies that are classed as non-strategic policies. There is therefore no requirement to be in general conformity with these policies.

**5.11** However, Maidstone Local Plan strategic policy SP18 covers the Historic Environment and is therefore relevant to HNP1 Part B. SP18 seeks to protect and enhance heritage assets and to sensitively manage and design developments which impact heritage assets and their settings. Headcorn Parish Council considers that HNP1 Part B is in general conformity with SP18, as HNP1 Part B requires development to be "*sympathetic to the setting of any heritage asset, and adheres to Conservation Area guidance where appropriate*".

**5.12** Therefore, Headcorn Parish Council considers that the Headcorn Neighbourhood Plan Design Policy (HNP1) and Design Guidance are in general conformity with the strategic policies in Maidstone's adopted Local Plan.

### **5.ii.a Maidstone Emerging Local Plan and HNP1: Design and Design Guidance**

**5.13** Unlike the adopted Local Plan, there is a strategic policy in the emerging Maidstone Local Plan covering the principles of good design (LPRSP15). In addition, strategic policy LPRSP14(B) covers the historic environment.

**5.14** The strategic design policy in the emerging Maidstone Local Plan (LPRSP15) looks to promote high quality design and covers general principles that are reflected in Headcorn Neighbourhood Plan Policies HNP1 on Design and the accompanying Design Guidance, as well as HNP2 on siting and landscaping and HNP3 on connectivity and access. Headcorn's policy (HNP1) is distinct, because it is specifically designed to meet Headcorn's needs. Therefore, for example, HNP1 explicitly refers to the typical height of properties in Headcorn (of no more than two and a half storeys), rather than the more open ended approach taken by LPRSP15 that needs to cover both rural villages and Maidstone's town centre. However, the general principles in LPRSP15 are reflected in Headcorn's Neighbourhood Plan, ensuring Headcorn's Neighbourhood Plan is in general conformity with the emerging Local Plan.

**5.15** The emerging Maidstone Local Plan strategic policy LPRSP14(B) covers the Historic Environment and is therefore relevant to HNP1 Part B. LPRSP14(B) seeks to protect and enhance heritage assets and to sensitively manage and design developments which impact heritage assets and their settings. Headcorn Parish Council considers that HNP1 part B would be in general conformity with LPRSP14(B), as HNP1 Part B requires development to be "*sympathetic to the setting of any heritage asset, and adheres to Conservation Area guidance where appropriate*".

**5.16** Therefore, Headcorn Parish Council considers that the Headcorn Neighbourhood Plan Design Policy (HNP1) and Design Guidance would be in general conformity with the strategic policies in Maidstone's emerging Local Plan, if required.

### **5.iii Maidstone Local Plan and HNP2: Siting, Landscaping and protecting the natural and historic environment and setting**

**5.17** HNP2 is the policy on siting, landscaping and protecting the natural and historic environment and setting, which sets the rules to determine how developments sit within the landscape. The relevant strategic policies in the adopted Maidstone Local Plan are therefore SS1 on the spatial strategy, SP17 on development in the countryside and SP18 on the historic environment, H1 on housing site allocations and relevant open spaces allocations.

**5.18** The relevant part of Policy SS1 is Part 10, which looks to conserve and enhance features such as the green and blue network of open spaces, rivers and water courses, as well as landscapes of local value (which includes the Low Weald landscape of local value covering most of Headcorn Parish). HNP2 is in general conformity with this policy because:

- It looks to protect distinctive views, which will help protect the Low Weald landscape of local value (HNP2 Part 2);
- Looks to retain and enhance public green spaces (HNP2 Part 3);

- Seeks to preserve and enhance the natural environment (HNP2 Part 4);
- Seeks to maintain and enhance wildlife corridors and stepping stones (HNP2 Part 5); and
- Seeks to ensure development will not cause damage to local streams and rivers (HNP2 Part 10).

**5.19** SP17 on development in the countryside looks to prevent harm to the character and appearance of the countryside (Part 1), retain the separation of individual settlements (Part 7) and conserve and enhance the Low Weald landscape of local value (Part 6). HNP2 is in general conformity with this policy, because it looks to:

- respect natural contours and sensitively incorporate natural features (HNP2 Part 4);
- ensure development is sensitively landscaped in a way that will protect and enhance Headcorn's rural landscape (HNP2 Part 7);
- reflect the established development patterns in the surrounding countryside and avoid development in isolated areas (HNP2 Parts 14 and 15); and
- protect distinctive views, which will help protect the Low Weald landscape of local value (HNP2 Part 2).

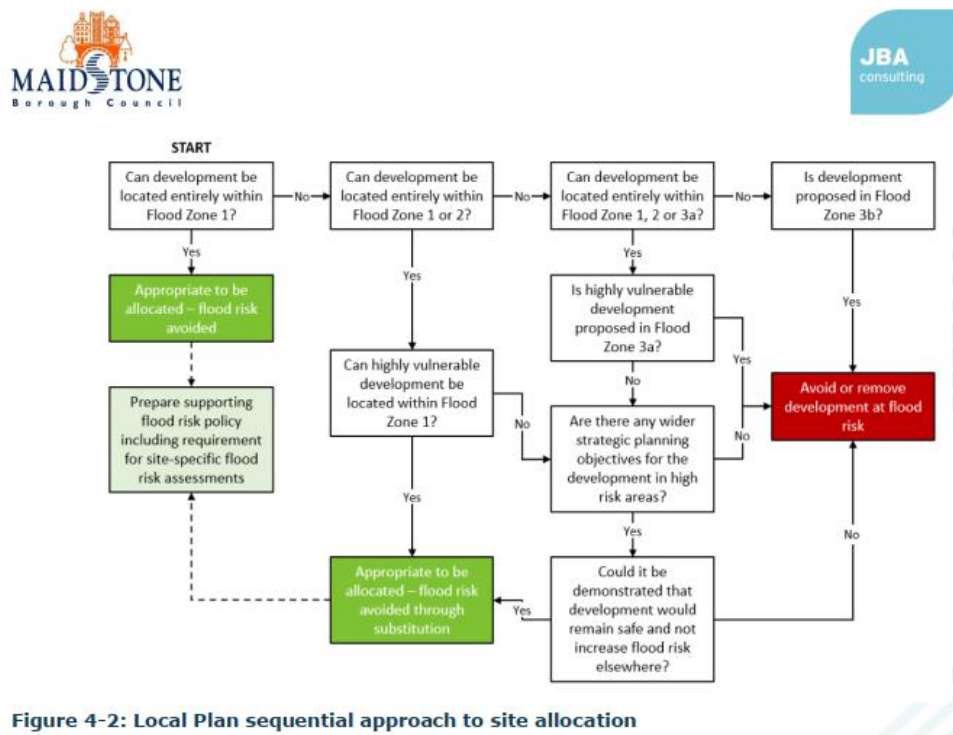
**5.20** SP18 covers the Historic Environment and is therefore relevant to HNP2 Part 1. SP18 seeks to protect and enhance heritage assets and to sensitively manage and design developments which impact heritage assets and their settings. HNP2 Part 1 is in general conformity with this policy, because it looks to respect the setting of listed buildings and protect and sensitively incorporate historic features.

**5.21** Local Plan Policy H1 covers housing site allocations within the Local Plan (rather than windfall developments) and looks to ensure appropriate surface water and robust flood mitigation measures for these sites and the incorporation of sustainable drainage. All the relevant site allocations in the adopted Local Plan in Headcorn have already been given consent and the majority have already been built out. Therefore HNP2 can have no impact on how these strategic allocations are implemented and must therefore be in general conformity.

**5.22** More generally, HNP2 Parts 12 and 13 seek to ensure that flooding and surface water run-off from sites is dealt with in a way that will not increase the risk of flooding elsewhere and that there is adequate drainage provision, with clearly identified responsibilities. These are clearly aligned to the general principles set out in Local Plan Policy H1.

**5.23** HNP2 Part 11 looks to ensure that development does not take place within Flood Zone 3b and that it avoids Flood Zones 2 and 3a unless it can be shown that development meets the requirements set out in the sequential and exemption tests set out in the NPPF. These proposals are in line with Maidstone Borough Council's own Strategic Flood Risk Assessment (SFRA) underpinning the emerging Maidstone Borough Local Plan (see Figure 1), as well as the NPPF. Headcorn Parish Council therefore considers that HNP2 remains appropriate.

**Figure 1: Maidstone Borough Council’s Local Plan approach to sequential flood risk assessment.**



**Figure 4-2: Local Plan sequential approach to site allocation**

**Source:** Maidstone Borough Council Level 1 SFRA update and Level 2 SFRA.

**5.24** In relation to the open spaces allocations OS10 and OS11, HNP2 Part 3 seeks to retain and enhance all public green spaces and recreational spaces in Headcorn, including spaces within existing developments. This would include open space allocations, meaning Policy HNP2 is in general conformity with this policy.

**5.25** For the reasons given, Headcorn Parish Council considers that Policy HNP2 is in general conformity with the adopted Local Plan.

**5.iii.a Maidstone Emerging Local Plan and HNP2: Siting, Landscaping and protecting the natural and historic environment and setting**

**5.26** There is no requirement to be in general conformity with an emerging Local Plan. However, the relevant strategic policies in the emerging Maidstone Local Plan that cover similar policy issues to HNP2 are: LPRSS1 (Part 14), LPRSP9, LPRSP14(A), LPRSP14(B) and LPRSP15.

**5.27** The relevant part of LPRSS1 is Part 14 and this is identical to adopted Local Plan Policy SS1 Part 10. This means Headcorn Neighbourhood Plan Policy is in general conformity with Policy LPRSS1.

**5.28** LPRSP9 covers development in the countryside and is identical to adopted Local Plan Policy SP17. This means Headcorn Neighbourhood Plan Policy is in general conformity with Policy LPRSP9.

**5.29** HNP2 is in general conformity with LPRSP14(A), which is a new strategic policy and covers the natural environment. LPRSP14(A) looks to:

- deliver biodiversity net gain for residential development. HNP2 Part 6 is in general conformity with this, as it looks for all development to deliver on-site biodiversity net gain in line with local and national targets and sets out mitigation measures where on-site biodiversity net gain cannot be achieved;
- protect landscape character, including trees, hedgerows, and features of biological or geological interest. HNP2 is in general conformity with this. In particular, HNP2 Part 4 seeks to sensitively incorporate natural features and respect natural contours, and HNP2 Part 7 seeks to protect trees and hedgerows and sets out mitigation measures if their removal cannot be avoided;
- avoid damage to internationally, nationally or locally designated sites of importance. HNP2 Part 10 seeks to ensure that development will not cause damage to local streams and rivers. This will help protect the River Beult SSSI;
- enhance, extend and connect habitats. HNP2 Part 4 (incorporating natural features to provide habitats for wildlife), Part 5 (maintain and enhance wildlife corridors and stepping stones), Part 7 (sensitive landscaping) and Part 9 (landscape buffers to create and enhance wildlife corridors) would all be in general conformity with this.

**5.30** LPRSP14(B) on the Historic Environment is different to policy SP18 in the adopted Local Plan. Nonetheless, HNP2 Parts 1 and 2 covering the historic environment and the Headcorn Conservation Area would all be in general conformity with LPRSP14(B) and particularly Part 3 of that policy, which calls for the incorporation of positive heritage policies within Neighbourhood Plans.

**5.31** The new strategic policy on design within the emerging Local Plan (LPRSP15) is also relevant to HNP2. Relevant parts of LPRSP15 are: Part 2 (respond to and enhance local, natural and historic character); Part 6 (respect the topography and sensitively incorporate natural features); and Part 9 (protect and enhance on-site biodiversity and geodiversity features). HNP2 has provisions that would help support these general principles, meaning it would be in general conformity with LPRSP15.

#### **5.iv Maidstone Local Plan and HNP3: Connectivity and access**

**5.32** There are no relevant overarching strategic policies in the adopted Maidstone Local Plan covering connectivity and access. SP7 seeks some highways improvements connected to specific housing allocations, and HNP3 would be in general conformity with these.

##### ***5.iv.a Maidstone Emerging Local Plan and HNP3: Connectivity and access***

**5.33** There are three new strategic policies in the emerging Maidstone Local Plan that cover issues that are relevant to HNP3. These policies are: LPRSP12 (sustainable transport), LPRSP14(C) (Climate change) and LPRSP15 (Design). HNP3 would be in general conformity with these policies.

**5.34** LPRSP12 (sustainable transport) seeks to:

- Improve walking and cycling options. HNP2 Part 1 looks to promote and enhance links to Headcorn High Street and the countryside that can be easily accessed by foot and cycle.
- Improve highway network capacity and function at key locations and junctions. HNP2 Part 8 looks to avoid exacerbating key pinch points for traffic flows, in part to support economic development. While the focus of HNP2 is different, both policies recognise the general principle that it is important to ensure traffic flow policies are effective.

**5.35** LPRSP14(C) (Climate change) seeks to prioritise active travel by ensuring good provision and connectivity of walking and cycling routes. HNP2 Part 1 looks to promote and enhance links to Headcorn High Street and the countryside that can be easily accessed by foot and cycle.

**5.36** LPRSP15 Part 11 (Design) seeks to accommodate safely the vehicle and pedestrian movement generated by the proposal on the local highway network and through the site access. HNP3 would be in general conformity with this guiding principle, as it seeks to: create safe and well connected developments (Part 1); enhance road safety (Part 2); avoid exacerbating key pinch points (Part 8); and avoid creating or exacerbating traffic problems, such as blocking lines of sight (Part 9).

## **5.v Maidstone Local Plan and HNP4: Infrastructure provision**

**5.37** Policy HNP4 on infrastructure provision sets the rules to ensure that specific types of infrastructure provision such as parking, broadband, water and sewerage, and promoting energy efficiency will meet the needs of local residents both now and in the future, as well as to set the priorities for infrastructure in Headcorn, reflecting local constraints. The relevant strategic policies in the adopted Maidstone Local Plan are: SP7 (Headcorn Rural Service Centre), SP21 (Economic development), SP23 (Sustainable transport) and ID1 (infrastructure delivery).

**5.38** HNP4 Part A looks to ensure there will be adequate parking provision, that the adoption of electric vehicles will be supported and that the loss of key parking facilities serving the village will be avoided. There is no direct overlap between HNP4 Part A and the strategic policies in the adopted Local Plan. However, SP23 Part 2.iv. seeks to manage parking provision in a way that is fair, proportionate and supports demand management. Headcorn Parish Council considers that HNP4 Part A is in general conformity with this policy. In particular, Headcorn Parish Council considers HNP4 Part A is proportionate given the evidence of significant concerns about inadequate parking provision in the village, and it will also help support positive economic outcomes for Headcorn High Street, by helping support demand.

**5.39** HNP4 Part B covers broadband provision in Headcorn. There is no direct overlap between HNP4 Part B and the strategic policies in the adopted Local Plan. However, SP21 looks to support improvements in information and communications technology. HNP4 Part B is in general conformity with this policy.

**5.40** HNP4 Part C covers water and sewerage management. There is no direct overlap between HNP4 Part C and the strategic policies in the adopted Local Plan. However, SP7 looks to support additional capacity in the sewer network and wastewater treatment works if necessary. HNP4 Part C is in general conformity with this policy.

**5.41** HNP4 Part D covers promoting energy efficiency. There is no overlap between HNP4 Part D and the strategic policies in the adopted Local Plan.

**5.42** HNP4 Part E covers the infrastructure priorities for Headcorn and particularly the priorities for Headcorn Parish Council's share of any CIL revenues. This reorders to priorities set out in ID1, which is a strategic policy in the adopted Local Plan to reflect the needs of Headcorn more effectively, given the evidence of the strengths and weaknesses of existing infrastructure in Headcorn from the 2021 Residents' Survey. Headcorn Parish Council notes that the definition of sustainable development set out in paragraph 8 of the NPPF includes the need to identify and coordinate the provision of infrastructure. Headcorn Parish Council is therefore required to do this in order to meet the basic condition of contributing to the achievement of sustainable development and having regard to national policy. Prioritising the list of infrastructure priorities in a way that matches Headcorn's specific needs is therefore both appropriate and necessary. Headcorn Parish Council notes that policy ID1 Part 4 of the Maidstone Local Plan explicitly states that:

*"This list serves as a guide to the council's prioritisation process, although it is recognised that each site and development proposal will bring with it its own issues **that could mean an alternate prioritisation is used**".*

**5.43** Headcorn Parish Council has taken advantage of this flexibility to reorder the list in recognition of the fact that sites in Headcorn will need to address the specific infrastructure constraints Headcorn faces. This will help ensure that the infrastructure provided will provide value for money. In addition, in relation to CIL payments, policy HNP4 Part E explicitly only applies this prioritisation to "*Headcorn Parish Council's Community Infrastructure (CIL) revenues*", rather than all CIL revenues arising from sites in Headcorn. Therefore Headcorn Parish Council considers that its chosen policy approach is both the most appropriate one, given Headcorn's needs, and is necessary to ensure Headcorn's Neighbourhood Plan meets the Basic Conditions and is in general conformity with Policy ID1.

#### **5.v.a Maidstone Emerging Local Plan and HNP4: Infrastructure provision**

**5.44** The relevant strategic policies in the emerging Maidstone Local Plan are: LPRSP6(C) (Headcorn), LPRSP11 (Economic Development), LPRSP12 (sustainable transport), LPRSP13 (infrastructure delivery) and LPRSP14(C) (Climate change).

**5.45** HNP4 Part A looks to ensure there will be adequate parking provision, that the adoption of electric vehicles will be supported and that the loss of key parking facilities serving the village will be avoided. There is no direct overlap between HNP4 Part A and the strategic policies in the emerging Local Plan. However, LPRSP12 Part 3.d. seeks to manage parking provision in a way that is fair, proportionate and supports demand management.

Headcorn Parish Council considers that HNP4 Part A would be in general conformity with this policy. In addition, LPRSP12 Part 3.m. seeks to support the provision and improvements to the electric vehicle charging infrastructure. HNP4 Part A would be in general conformity with this policy.

**5.46** HNP4 Part B covers broadband provision in Headcorn. There is no direct overlap between HNP4 Part B and the strategic policies in the emerging Local Plan. However, LPRSP11 looks to support improvements in digital technology and communications. HNP4 Part B would be in general conformity with this policy.

**5.47** HNP4 Part C covers water and sewerage management. There is no direct overlap between HNP4 Part C and the strategic policies in the emerging Local Plan. However, LPRSP6(C) looks to support additional capacity in the sewer network and wastewater treatment works if necessary. HNP4 Part C would be in general conformity with this policy. LPRSP14(C) also requires high levels of water efficiency, and HNP4 Part C's requirement to employ best practice options for promoting efficient use of water would be in general conformity with this.

**5.48** HNP4 Part D covers promoting energy efficiency. LPRSP14(C) looks to support features such as renewable energy infrastructure, meaning HNP4 Part D would be in general conformity with LPRSP14(C).

**5.49** HNP4 Part E covers the infrastructure priorities for Headcorn and particularly the priorities for Headcorn Parish Council's share of any CIL revenues. This sets out a different prioritisation to the priorities set out in LPRSP13, which is a strategic policy in the emerging Local Plan. As with policy ID1 in the adopted Local Plan, LPRSP13 envisages some flexibility in the prioritisation process, namely:

*"This list serves as a guide to the council's prioritisation process, although it is recognised that each site and development proposal will bring with it its own issues **that could mean an alternate prioritisation is used**".*

**5.50** Headcorn Parish Council has taken advantage of this flexibility to reorder the list in recognition of the fact that sites in Headcorn will need to address the specific infrastructure constraints Headcorn faces. This will help ensure that the infrastructure provided will provide value for money. In addition, in relation to CIL payments, policy HNP4 Part E explicitly only applies this prioritisation to "*Headcorn Parish Council's Community Infrastructure (CIL) revenues*", rather than all CIL revenues arising from sites in Headcorn. Therefore Headcorn Parish Council considers that its chosen policy approach is both the most appropriate one, given Headcorn's needs, and is necessary to ensure Headcorn's Neighbourhood Plan meets the Basic Conditions and that it would be in general conformity with Policy LPRSP13.

## **5.vi Maidstone Local Plan and HNP5: New dwellings**

**5.51** Policy HNP5 on new dwellings covers both housing and gypsy and traveller pitches. This policy addresses issues such as where different types of development can be located, what the mix of provision should be in larger developments. The relevant strategic policies



in the adopted Maidstone Local Plan that cover new dwellings are: SP7 on Headcorn Rural Service Centre and the associated strategic allocations (both for housing and gypsy and traveller allocations); SP17 development in the countryside; SP19 Housing mix; and Affordable Housing: SP20 Part 3, Policy H1 criteria (iv).

**5.52** Headcorn's Neighbourhood Plan does not allocate any sites for either housing or gypsy and traveller pitches. Where the Neighbourhood Plan sets policies governing the location of potential development (such as HNP5 Parts I.3, III and IV), it explicitly uses the phrasing such as "outside the strategic allocations set out in the adopted Local Plan" to ensure there will be no conflict with strategic allocations within an adopted Local Plan. Therefore Headcorn's Neighbourhood Plan is in general conformity with SP7 and the associated strategic allocations for housing and gypsy and traveller allocations.

**5.53** Maidstone Borough's adopted Local Plan Policy SP17 allows for some development in the countryside, providing it does not harm the character of the area and will ensure the separation of individual settlements is retained. It also seeks to conserve and enhance the distinctive landscape character of the Low Weald landscape of local value, which includes most of Headcorn Parish. Headcorn Neighbourhood Plan aims to ensure that distinctive landscape character of Headcorn Parish is preserved and enhanced through the policy on siting and landscaping (HNP2), which seeks ensure that any development follows the established development pattern of small clusters of dwellings with significant gaps in between, as well as avoiding more isolated parts of the parish. Policy HNP5 Parts I.3 and IV reinforce this policy, by setting rules on the types of development that will (and won't) be allowed in the countryside. In developing these policies, Headcorn Parish Council sought to manage large developments in the countryside, as it considers these would be detrimental to the character of the area. Given the focus of policy HNP5 Parts I.3 and IV is on ensuring that development does not occur that would be detrimental to the character of the area, Headcorn Parish Council considers that HNP5 is in general conformity with SP17.

**5.54** In relation to SP19 on housing mix, Headcorn's Neighbourhood Plan policy HNP5 is in general conformity with this policy, because it seeks to ensure there will be a mix of dwellings in all major developments (of 10 or more houses). In particular, HNP5 Part II.6 looks to create mixed developments in line with SP19 Part 1. Headcorn's Neighbourhood Plan also seeks to ensure the delivered housing mix will "reflect the needs of those living in Maidstone Borough" (SP19 Part 1), by ensuring that developments will include properties designed to meet the needs of emerging households in Headcorn. HNP5 Part II.4 also looks to ensure that developments incorporate a proportion of housing for the elderly and disabled, which is in line with policy SP19 Part 5. In order to support self-build plots, HNP5 Part I.3 includes community self-build projects of up to 9 dwellings as schemes that would be allowed in the countryside of Headcorn Parish.

**5.55** In relation to Affordable Housing, the total number of affordable housing units achieved under Headcorn's Neighbourhood Plan remains the same as the number of units under Maidstone Local Plan Policy SP20. The proposed affordable housing mix in Policy HNP5.II.5 differs from the mix in Policy SP20 Part 3, by seeking to deliver a higher share of

affordable housing to buy.<sup>22</sup> However, Headcorn Parish Council considers that Policy HNP5.II.5 is both appropriate (given the evidence) and is still in general conformity with Policy SP20, which refers to both “indicative targets for tenure” and the need to take “account of the evidence available at that time”, which should include the Headcorn specific evidence gathered to inform Headcorn’s Neighbourhood Plan. The same considerations apply to Maidstone Local Plan Policy H1 criteria (iv), as this simply refers to policy SP20.

### **5.vi.a Maidstone Emerging Local Plan and HNP5: New dwellings**

**5.56** The relevant strategic policies in the emerging Maidstone Local Plan are: LPRSP6(C) on Headcorn and the associated strategic allocations; LPRSP9 on development in the countryside; LPRSP10(A) on housing mix; and LPRSP10(B) on affordable housing. The relevant parts of these policies remain largely unchanged from the adopted Local Plan, therefore Headcorn Parish Council considers that Policy HNP5 would be in general conformity with the emerging Local Plan.

**5.57** The policy on affordable housing in the emerging Local Plan has been subject to some drafting changes relative to the adopted Local Plan policy, but Headcorn Parish Council still considers that HNP5 would be in general conformity with the relevant policy, LPRSP10(B). Under Headcorn’s Neighbourhood Plan the number of affordable housing units remains the same as under Maidstone’s emerging Local Plan. The proposed affordable housing mix in Policy HNP5.II.5 does differ from the mix in LPRSP10(B) Part 4, as it seeks to achieve a higher share of affordable housing to buy, in line with the needs of emerging households in Headcorn. However, Headcorn Parish Council considers that Policy HNP5.II.5 is both appropriate (given the evidence) and is still in still in general conformity with Policy LPRSP10(B), which refers to both “indicative targets for tenure” and the need to take “account of the evidence available at that time”, which should include the Headcorn specific evidence gathered to inform Headcorn’s Neighbourhood Plan.

**5.58** The emerging Local Plan does seek to change the focus of affordable housing to buy compared to the adopted Local Plan, as it only looks to provide First Homes, while the adopted Local Plan focuses on shared ownership and intermediate rented houses. Headcorn’s Neighbourhood Plan would accommodate all these types of affordable housing as the policy covers: “*First Homes, starter homes, discounted market sales housing, shared equity, or a similar scheme that aims to promote home ownership*”. This broader definition is more aligned to the definition of affordable housing to buy set out in the NPPF, but would be in general conformity with both the adopted and emerging Local Plans in terms of the types of affordable housing to buy that will be delivered.

### **5.vii Maidstone Local Plan and HNP6: The economy**

**5.59** Policy HNP6 on the economy covers the rules governing all business development, as well as specific rules designed to support the success of Headcorn High Street, and rules governing any future development of the Headcorn aerodrome and commercial energy

---

<sup>22</sup> Note that National Planning Practice Guidance envisages that Neighbourhood Plans will be able to support the provision of affordable housing to buy, including by varying the types of affordable housing expected, see Paragraph: 100 Reference ID: 41-100-20190509.

generation. The relevant strategic policies covering the economy in the adopted Maidstone Local Plan are: SP5, SP7, SP21 and SP22, together with employment allocation EMP1(1).

**5.60** Headcorn's Neighbourhood Plan policy HNP6 Part A seeks to promote the role of Headcorn High Street. This is in general conformity with Local Plan policies SP5 and SP7, which seek to resist the loss of local shops, as well as SP21 Part iii, which seeks to enhance the vitality and viability of retail centres.

**5.61** Headcorn's Neighbourhood Plan does not seek to allocate additional employment sites, nor would it support the conversion of identified Economic Development Areas within the adopted Local Plan to residential use. HNP6 is therefore in general conformity with the relevant adopted Local Plan policies.

### ***5.vii.a Maidstone Emerging Local Plan and HNP6: The economy***

**5.62** The relevant strategic policies in the emerging Local Plan are: LPRSP6 and LPRSP6(C); LPRSP11; LPRSP11(A); LPRSP11(B); and LPRSP11(C).

**5.63** Headcorn's Neighbourhood Plan policy HNP6 Part A seeks to promote the role of Headcorn High Street. This would be in general conformity with Local Plan policies LPRSP6 and LPRSP6(C), which seek to resist the loss of local shops, as well as LPRSP11 Part 3, which seeks to enhance the vitality and viability of retail centres and new policy LPRSP11(C), which seeks to maintain and enhance existing retail function, including Headcorn High Street.

**5.64** LPRSP11(A) and LPRSP11(B) would permit development that would be of a type and scale that would not harm the character of the area or the amenity of occupiers of nearby properties. Headcorn Parish Council considers that HNP6 Parts 1-5 and particularly Parts 2-4 would be in general conformity with these policies.

**5.65** Headcorn's Neighbourhood Plan does not impose the same requirement for economic development to be readily accessible by public transport, foot or cycle set out in the emerging Local Plan. This is because, outside of developments along the A274, the provision of public transport would not be economically viable, and foot and cycle accessibility would not necessarily be achievable on the rural lanes within Headcorn Parish. Headcorn Parish Council therefore considers that imposing a requirement of this type would undermine the viability of many businesses (and potential businesses) within the Parish. However, Policy HNP3 on connectivity and access does seek to ensure that development will be safe and well connected. Headcorn Parish Council therefore considers that the Neighbourhood Plan would be in general conformity with the emerging Local Plan.

## 6. DOES NOT BREACH EU OBLIGATIONS

**6.1** For any Neighbourhood Plan to be adopted it must ensure it does not breach, and is otherwise compatible with, EU obligations. National Planning Policy Guidance sets out that the EU Directives that may be of particular relevance to neighbourhood planning are:<sup>23</sup>

- Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (often referred to as the Strategic Environmental Assessment (SEA) Directive).
- Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (often referred to as the Environmental Impact Assessment (EIA) Directive).
- Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora and Directive 2009/147/EC on the conservation of wild birds (often referred to as the Habitats and Wild Birds Directives respectively). These aim to protect and improve Europe's most important habitats and species.
- Other European directives, such as the Waste Framework Directive (2008/98/EC), Air Quality Directive (2008/50/EC) or the Water Framework Directive (2000/60/EC) may apply to the particular circumstances of a draft neighbourhood plan or Order.

**6.2** In the case of Headcorn's Neighbourhood Plan, Headcorn Parish Council considers that four Directives are potentially relevant: the Strategic Environmental Assessment Directive; the Habitats and Wild Birds Directives; and the Water Framework Directive.

**6.3** Headcorn Parish Council was advised by Maidstone Borough Council on 10<sup>th</sup> May 2023 that a formal Strategic Environmental Assessment was not needed in the case of Headcorn's Neighbourhood Plan, see Appendix 2.<sup>24</sup>

**6.4** Headcorn Parish Council was advised by Maidstone Borough Council on 10<sup>th</sup> May 2023 that a formal Habitats Regulation Assessment Screening was not needed in the case of Headcorn's Neighbourhood Plan, see Appendix 2.<sup>25</sup>

**6.5** A screening assessment of whether Headcorn's Neighbourhood Plan needs to undertake a formal assessment with respect to the Water Framework Directive has not been undertaken. However, Headcorn Parish Council considers that the policies within the Headcorn Neighbourhood Plan are compatible with the aims of this Directive, namely to achieve good ecological, chemical and quantitative status in all bodies of surface water and groundwater by 2027. Headcorn Parish Council and the Headcorn Neighbourhood Plan do not set regulations in relation to these matters. However, Headcorn Neighbourhood Plan Policy HNP2 Parts 10-13 covers: a specific requirement "not to cause damage to local

---

<sup>23</sup> See National Planning Policy Guidance Paragraph: 078 Reference ID: 41-078-20140306.

<sup>24</sup> This advice is based on the emerging policies in Headcorn's Neighbourhood Plan, and on Maidstone Borough Council's discussions with the statutory consultees.

<sup>25</sup> This advice is based on the emerging policies in Headcorn's Neighbourhood Plan, and on Maidstone Borough Council's discussions with the statutory consultees.

streams and rivers"; flooding; dealing with surface water run-off; and drainage. Similarly, Headcorn Neighbourhood Plan Policy HNP4 Part C covers Water and sewerage management, including the need for adequate capacity and that sewerage outflow and waste water from developments will be fully in accordance with the Headcorn Waste Water Treatment Works' environmental permit. Headcorn Parish Council therefore considers that Headcorn's Neighbourhood Plan supports the goals of the Water Framework Directive.

**6.6** Therefore, Headcorn Parish Council considers that Headcorn's Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations.

# APPENDIX 1: MAIDSTONE BOROUGH COUNCIL – RECORD OF DECISION APPROVING HEADCORN PARISH AS A NEIGHBOURHOOD PLAN AREA

## MAIDSTONE BOROUGH COUNCIL

### RECORD OF DECISION OF THE HEAD OF PLANNING

Decision Made: 8 April 2013

#### Neighbourhood Plan Area Application

##### **Issue for Decision**

To consider

Headcorn parish as a Neighbourhood Plan Area.

##### **Decision Made**

The neighbourhood area submitted by Headcorn Parish Council to Maidstone Borough Council on 3rd December 2012 is **approved**.

##### **Reasons for Decision**

#### Consultation

Consultation commenced on Monday 4th February 2013 and ended at 5pm on Tuesday 19th March 2013. The consultation was advertised as follows:

1. Note distributed to all households in the parish at start of consultation period
2. Neighbourhood Plan Area application (including a map) posted on Maidstone Borough Council's website and on Headcorn Parish Council's website
3. Poster advertising the consultation on notice boards in the parish
4. Ward members and adjoining ward members were made aware of the consultation via email

#### Representations Received During Consultation

Four representations were received in support of the application. No objections were received.

#### Considerations

1. Does the proposed plan area follow existing, established administrative or planning boundaries?

YES – the proposed plan area follows the existing parish boundary

2. Does it exclude areas which in planning terms it would be more appropriate to include (for example where planning designation or development location straddles a parish boundary)

NO

3. Does it overlap with another approved neighbourhood area (this is not permitted)

NO

#### Conclusion

Headcorn Parish Council will be preparing the neighbourhood plan and are considered a relevant body<sup>(1)</sup> under the Localism Act 2011.

The identification of Headcorn in Maidstone Borough Council's Core Strategy as a Rural Service Centre places specific emphasis on the growth of the village as a place to live and work. The village must therefore accommodate additional housing and the necessary associated infrastructure in the near future. Headcorn Parish Council is progressing with the preparation of a neighbourhood plan and believes a robust and well considered neighbourhood plan offers the best opportunity to accommodate growth in a successful way.

Headcorn has a well defined and established boundary as a parish, which includes the village centre, the hamlet of Hawkenbury, outlying farms and other properties. It is intended that the whole of the parish will be the designated area for the neighbourhood plan. Working to the same boundary for both the parish and the neighbourhood plan will avoid potential confusion for those that live, work and visit the parish.

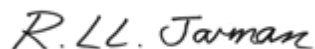
No objections were received during consultation and the proposed plan area (see map below)<sup>(2)</sup> meets the criteria set out above. The plan area is considered acceptable in planning terms and the parish council has followed due process in line with the Neighbourhood Planning (General) Regulations, Part 2, S. 5(1).

#### **Alternatives considered and why rejected**

The decision to approve the neighbourhood plan area has been made for the reasons stated above. The alternative is to reject the application but the council is satisfied that due process has been followed and no representations were made during the consultation to suggest the geographic area of the parish should not form the Neighbourhood Plan Area.

## **Background Papers**

None



Signature: \_\_\_\_\_

Rob Jarman, Head of Planning

<sup>(1)</sup>For the definition of "relevant body" see section 61G (2) of the 1990 Act (inserted by paragraph 2 of Schedule 9 to the Localism Act 2011 (c.20).

<sup>(2)</sup> The Map referred to is HNP Policy Map 1, which is also included in Section 2 of this Basic Condition Statement.

**APPENDIX 2: MAIDSTONE BOROUGH COUNCIL - STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT - SCREENING ASSESSMENT**

---

**Regulation 14  
Headcorn Neighbourhood Plan  
Pre-Submission Version**

**April 2023**

**Strategic Environmental Assessment  
and Habitats Regulations Assessment -  
Screening Assessment Report**

**Prepared by Maidstone Borough Council**



## 1 Introduction

The need for environmental assessment of plans is set out in the EU Directive 2001/42/EC – known as the SEA Directive. Under this Directive, Neighbourhood Plans may require an SEA – but this will depend on the content of each Neighbourhood Plan.

In some circumstances, where a neighbourhood plan could have significant environmental effects, it may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require a strategic environmental assessment.

One of the basic conditions that will be tested by the independent examiner of a Neighbourhood Plan is whether the making of the plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).

Whether a neighbourhood plan requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed in the draft neighbourhood plan. A strategic environmental assessment may be required, for example, where:

- the neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan

The main determining factor as to whether an SEA is required on a Neighbourhood Plan is if it is likely to have a significant effect on the environment. Those Neighbourhood Plans containing land allocations for development, whose impacts have not been tested in the local authority's plan, may require an SEA. Neighbourhood Plans which do not contain such allocations (or simply reflect allocations already identified as part of a local authority plan) are less likely to require an SEA.

Maidstone Borough Council is legally required to determine whether the Headcorn Neighbourhood Plan will require an SEA. However, if it is concluded that an SEA is required, those preparing the plan are responsible for its production and it must form part of the material that is consulted on once the formal consultation stage is reached.

## **2 Legislative Background**

The basis for Strategic Environmental Assessments and Sustainability Appraisal is the European Directive 2001/42/EC which has subsequently been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. The Government has produced National Planning Practice Guidance in relation to strategic environmental assessments and sustainability appraisals to provide clarity on the need for them in relation to plan development.

Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 (as amended) makes provision in relation to the Habitats Directive. The Directive requires that any plan or project likely to have a significant effect on a European site must be subject to an Appropriate Assessment. To achieve this, paragraph 1 of Schedule 2 prescribes a basic condition that the making of a neighbourhood plan is not likely to have a significant effect on a European site. Paragraphs 2 to 5 of the Schedule amend the Conservation of Habitats and Species Regulations 2010 so as to apply its provisions to neighbourhood development orders and neighbourhood plans. In particular, paragraph 4 inserts new regulation 78A which provides that a neighbourhood development order may not grant planning permission for development which is likely to have a significant effect on a European site. These changes have been reflected in the Conservation of Habitats and Species Regulations 2017.

This report focuses on screening for SEA and the criteria for establishing whether a full assessment is needed.

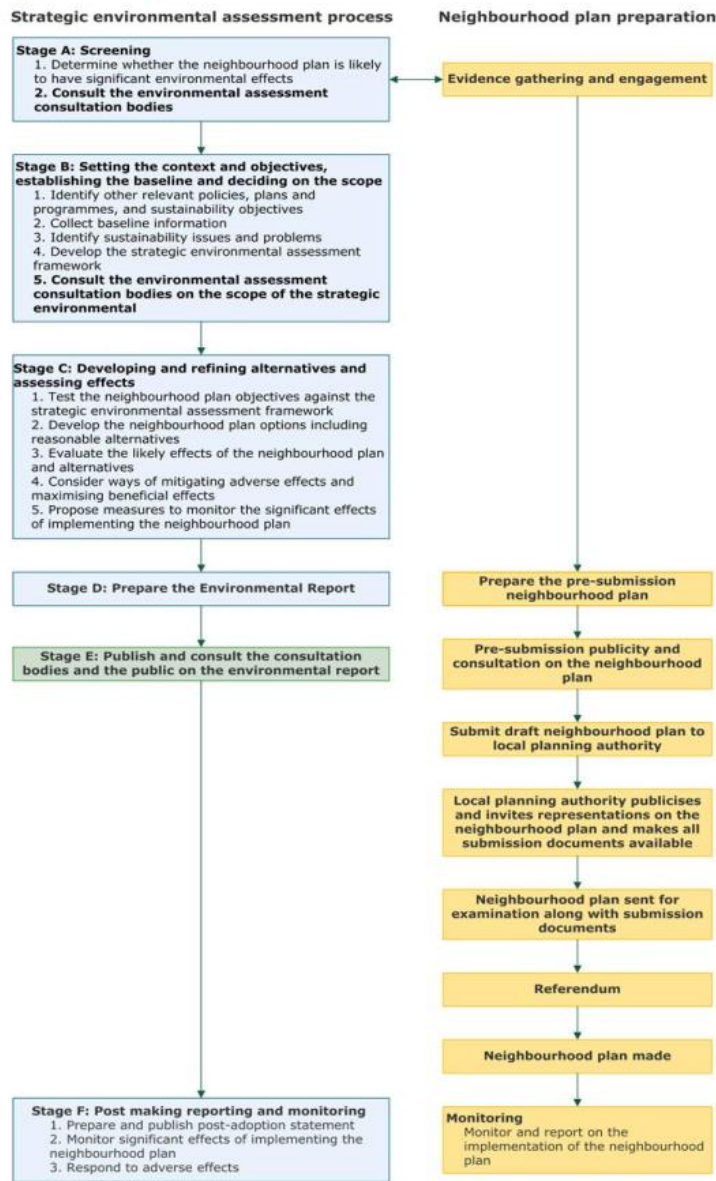
### **3 Screening Process**

Headcorn Parish Council requested an SEA screening opinion of its Pre-Submission Consultation Draft Neighbourhood Plan on 30<sup>th</sup> January 2023. It is Maidstone Borough Council's responsibility to assess whether the policies and proposals in the Neighbourhood Plan are likely to have 'significant environmental effects'.

The National Planning Practice Guidance in relation to strategic environmental assessments sets out the approach to producing an SEA Figure 1 (below). This guidance recommends that an assessment be undertaken in the early stages of plan making and this screening is undertaken at the draft Neighbourhood Plan stage.

The first stage is the screening process (Stage A in Figure 1 below) to determine whether the neighbourhood plan is likely to have significant environmental effects. The screening process includes a 5 week consultation with the statutory consultees. If the screening process concludes that the Headcorn Neighbourhood Plan requires an environmental report, the Parish Council is responsible for preparing the scoping report (Stage B) and must consult the statutory consultees. Stages B and C would need to include consideration of reasonable alternatives, to inform the selection and refinement of the preferred options. The preparation of the Environmental Report (Stage D) would need to identify, describe and evaluate the likely significant effects on the environment of implementing the policies in the neighbourhood plan and of the reasonable alternatives taking into account the objectives and geographical scope of the plan.

Figure 1 – SEA Process

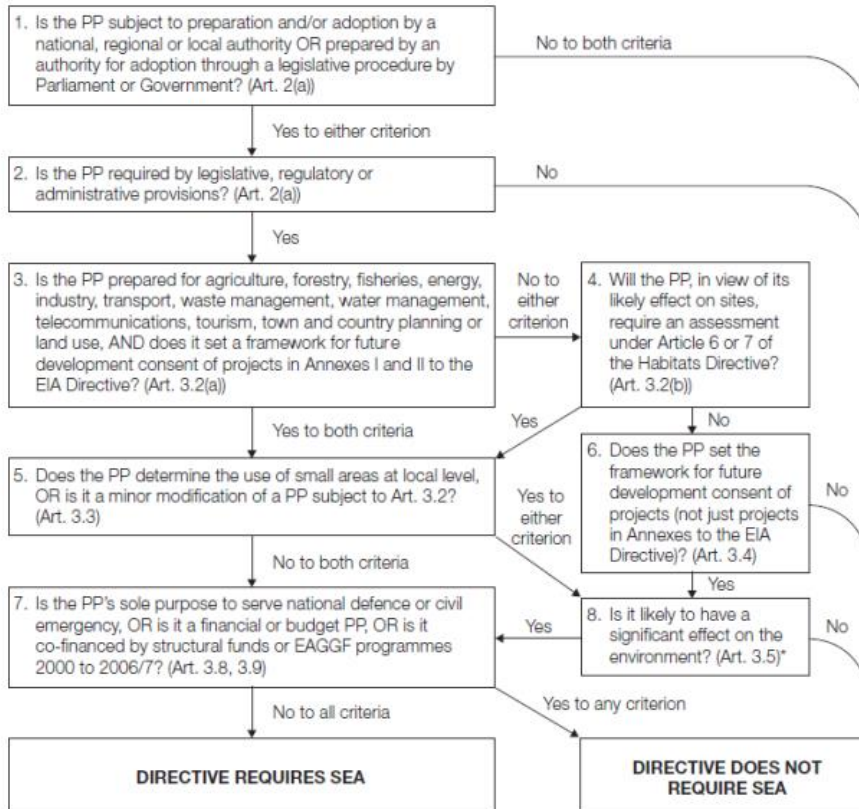


## 4 Screening Assessment

The government guidance 'A practical guide to the Strategic Environmental Assessment Directive' sets out the following approach to be taken in determining whether an SEA is required:

Figure 2 – Application of the SEA Directive to plans and programmes

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



\*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

The screening opinion assessment set out below is undertaken in two parts: the first part assesses whether the plan requires an SEA (following the process stipulated in the flow chart); and the second part of the assessment will consider

whether the Neighbourhood Plan is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the EU SEA Directive and the UK Environmental Assessment of Plans and Programmes Regulations 2004.

#### 4.1 Assessment 1: Establishing the Need for SEA

Stage	Yes/ No	Reason
1. Is the Neighbourhood Plan (NP) subject to preparation and/or adoption by a national, regional or local authority, OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	The preparation and adoption of the NP is allowed under the Town and Country Planning Act 1990 (as amended by the Localism Act 2011). The NP is prepared by Headcorn Parish Council (as the 'relevant body') and subject to the outcome of Examination and referendum will be 'made' by Maidstone Borough Council as the local authority. The preparation of NPs is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 (as amended) and The Neighbourhood Planning (referendums) Regulations 2012 (as amended). <i>GO TO STAGE 2</i>
2. Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	Whilst the NP is not a requirement and is optional under the provisions of the Town and Country Planning Act (as amended), it will, if 'made', form part of the Development Plan for the Borough and the NPPF states that it is highly desirable that local planning authorities should have an up-to-date plan in place. The NPPF also states that neighbourhoods should develop plans that support the delivery of strategic policies contained in Local Plans. <i>GO TO STAGE 3</i>
3. Is the NP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))	Yes	The NP is being prepared for town and country planning and land use. The NP will therefore provide a framework for future development consent of development projects, the most relevant of which are set out in Annex II of the EIA Directive including Infrastructure projects 10(b) Urban-development projects).  <i>GO TO STAGE 5</i>

5. Does the NP determine the use of small areas at local level OR is it a minor modification of a plan or programme subject to Art. 3.2? (Art. 3.3)	Yes	The NP may be used to help determine the use of land on small sites at a local level.  <i>GO TO STAGE 8</i>
8. Is it likely to have a significant effect on the environment? (Art 3.5)	No	See Assessment 2: Likely significant effects on the environment. Summary:  <i>DIRECTIVE DOES NOT REQUIRE SEA</i>



#### 4.2 Assessment 2: Likely Significant Effects on the Environment

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Maidstone Borough Council Assessment	Likely significant environmental effect?
<b>Characteristics of the Neighbourhood Plan, having regard to:</b>		
The degree to which the Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The NP would, if made, form part of the statutory Development Plan and as such does contribute to the framework for future development consent of projects. The NP sits within the wider framework of the NPPF and the Maidstone Borough Local Plan. Headcorn is located in the southeast of Maidstone borough and is a rural parish that covers 2,125 hectares. The area is home to 2.18% of Maidstone Borough's total population. The adopted Local Plan 2017 and its emerging Local Plan Review identifies Headcorn as a Rural Service Centre in Policy SP7 and Policy LPRSP6(c) in the emerging Local Plan Review. These policies direct a modest amount of development towards Headcorn including residential dwellings and employment floorspace. The NP does not propose any new site allocations.	No
The degree to which the Plan influences other plans and programmes including those in a hierarchy.	The NP must take into account the National Planning Policy Framework and the plan should be in general conformity with the strategic policies of the Maidstone Borough Local Plan (or Local Plan Review subject to its adoption). Whilst significant to the Parish, the NP is unlikely to significantly influence other plans and programmes but may	No

	have a limited degree of influence over the formation of future strategic policies.	
The relevance of the Plan for the integration of environmental considerations in particular with a view to promoting sustainable development.	The NP must meet the basic condition to contribute to sustainable development. Sustainability is a key focus in the NP and policies promote enhancing existing wildlife corridors, planting native trees, and using appropriate landscape buffers between new and existing developments.	No
Environmental problems relevant to the Plan.	The NP looks to limit the environmental impact from development through protection of ancient woodlands, River Beult SSSI and local wildlife habitats.	No
The relevance of the Plan for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The NP is not directly relevant to the implementation of European legislation, although it will need to take the impact of the Water Framework Directive into account.	No
<b>Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b>		
The probability, duration, frequency and reversibility of the effects.	The NP includes policies which look to ensure development is sustainable. The NP does not allocate any sites for development and therefore any likely effects are expected to be localised.	No
The cumulative nature of the effects of the Plan.	The NP does not allocate sites for housing or other forms of development and due to the limited geographic scope of the NP, the cumulative effects are likely to be minimal.	No
The trans-boundary nature of the effects of the Plan.	The NP is focused on Headcorn Parish only and would unlikely have limited trans-boundary effects given its limited geographical scope and not proposing any new sites for new development.	No

The risks to human health or the environment (e.g. due to accidents).	There are not expected to be any significant risks to human health.	No
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) by the Plan.	The NP covers Headcorn located in the south east of the borough. The geographic area and population of the plan areas are relatively small in relation to the wider borough with 2.18% of the total borough population residing in this location. Therefore, the effects of the plan will be relatively localised.	No
The value and vulnerability of the area likely to be affected by the Plan due to: (i) Special natural characteristics or cultural heritage; (ii) Exceeded environmental quality standards or limit values; or (iii) Intensive land use	(i) Special natural characteristics or cultural heritage such as listed buildings and the conservation areas, will not be significantly adversely affected by the NP; (ii) The NP is not expected to exceed environmental quality standards or limit values; (iii) The NP is localised with limited likely effects on intensive land use.	No
The effects of the Plan on areas or landscapes which have recognised national, community or international protection status.	Although just over a quarter of the borough is within the Kent Downs Area of Outstanding Natural Beauty located to the north of Maidstone town, the NP area is set some distance away in the south east of the borough. The NP supports national policies for the protection of the Low Weald Landscape of Local Value. The NP also seeks to protect local landscapes such as wildlife corridors, ancient and species rich hedgerows. The plan is unlikely to adversely impact on the River Beult SSSI. Overall, the NP is not likely to have a significant impact on national or community protection status.	No
Assessment 2 Conclusion	The Headcorn NP is not likely to have a significant effect on the environment.	

## **5 Habitats Regulations Assessment Screening**

The Habitats Regulations Assessment (HRA) screening tests whether the Headcorn Neighbourhood Plan Pre-Submission Version, in view of its likely effect on sites of European importance, will require an assessment for future development under Article 6 or 7 of the Habitats Directive (Article 3.2(b)).

Maidstone Borough contains two sites of European importance: North Downs Woodlands to the northwest of the borough is a Special Area of Conservation (SAC) and Queendown Warren SAC which lies on the northern border of Maidstone Borough.

New development that is delivered within the Borough over the next two decades is likely to place additional pressure on these areas, particularly through increased recreational pressure on the North Downs Woodland SAC. However, in this respect the Habitats Regulations Assessment Screening Report (2016) for the Regulation 19 Local Plan, February 2016 tested the impact of 18,560 new dwellings primarily concentrated in the Maidstone Urban Area but with limited development in the Headcorn area.

The Screening Report examined closely the impacts of consequential recreational pressure and air quality on the North Downs Woodlands SAC and recreational pressure on Queendown Warren SAC and the Medway Estuary and Marshes SPA and Ramsar site. The report concludes that policies within Maidstone Borough's Local Plan - Publication (Regulation 19) February 2016 can be screened out from further consideration both, alone and in-combination with other projects or plans.

In terms of recreational pressure, the NP supports the continued use of land for recreational use.

Finally, Headcorn is located south east of Maidstone urban area and the limited additional population supported by the Neighbourhood Plan is therefore less likely to place recreational pressure on the two sites of European importance to the north west of the town.

On balance, the Headcorn Neighbourhood Plan is not likely to cause a significant effect on a European site will not require an assessment for future development under Article 6 or 7 of the Habitats Directive (Art. 3.2(b)).

### Local Plan Review

As the Local Plan Review is at an advanced stage the Council has thought it prudent to also test the Headcorn Neighbourhood Plan against the latest version of the Habitats Regulation Assessment for that document. The LPR HRA states policy LPRSP6(c) – Headcorn may result in types of development or activities that could affect European sites. Development in Headcorn contributes to increased traffic to A249 and A229 which results in changes in water abstraction and discharge. With regards to recreational pressure the LPR HRA concludes that Policy LPRSP6(c) Headcorn is unlikely to contribute to recreation pressure.

On balance, the Headcorn Neighbourhood Plan is not likely to cause a significant effect on a European site will not require an assessment for future development under Article 6 or 7 of the Habitats Directive (Art. 3.2(b)).

## **6 Next Steps**

The three statutory consultation bodies (Historic England, Environment Agency and Natural England) were consulted for the statutory 5-week period (27<sup>th</sup> February to 3<sup>rd</sup> April 2023) to determine whether they agree with the conclusion of the draft screening opinion, in establishing whether the Regulation 14 Headcorn Neighbourhood Plan Pre-Submission Consultation Draft requires an SEA and whether it may have a 'significant environmental effect'.

### **Summary of Consultation Responses**

Representations were received from all of the statutory consultees and responses are summarised below.

#### **Historic England**

"On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required."

#### **Environment Agency**

Provision of Neighbourhood Plan advice note which explains the key issues to be considered when preparing and reviewing the plan. No specific representations were made with respect to the findings of the draft Screening Assessment.

#### **Natural England**

"It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan."

#### **Habitats Regulation Assessment (HRA) Screening**

Natural England agrees with the report's conclusions that the Headcorn Neighbourhood Plan would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.

## **7 Final Screening Assessment**

As a result of the Screening Assessment, it is considered that the Headcorn Neighbourhood Plan Pre-submission Version is not likely to have a significant effect on the environment.

In addition, it is considered that the Headcorn Neighbourhood Plan Pre-submission version is not likely to cause a significant effect on a European site and will not therefore require an assessment for future development under Article 6 or 7 of the Habitats Directive (Art. 3.2(b)).

## APPENDIX 3: REFERENCES

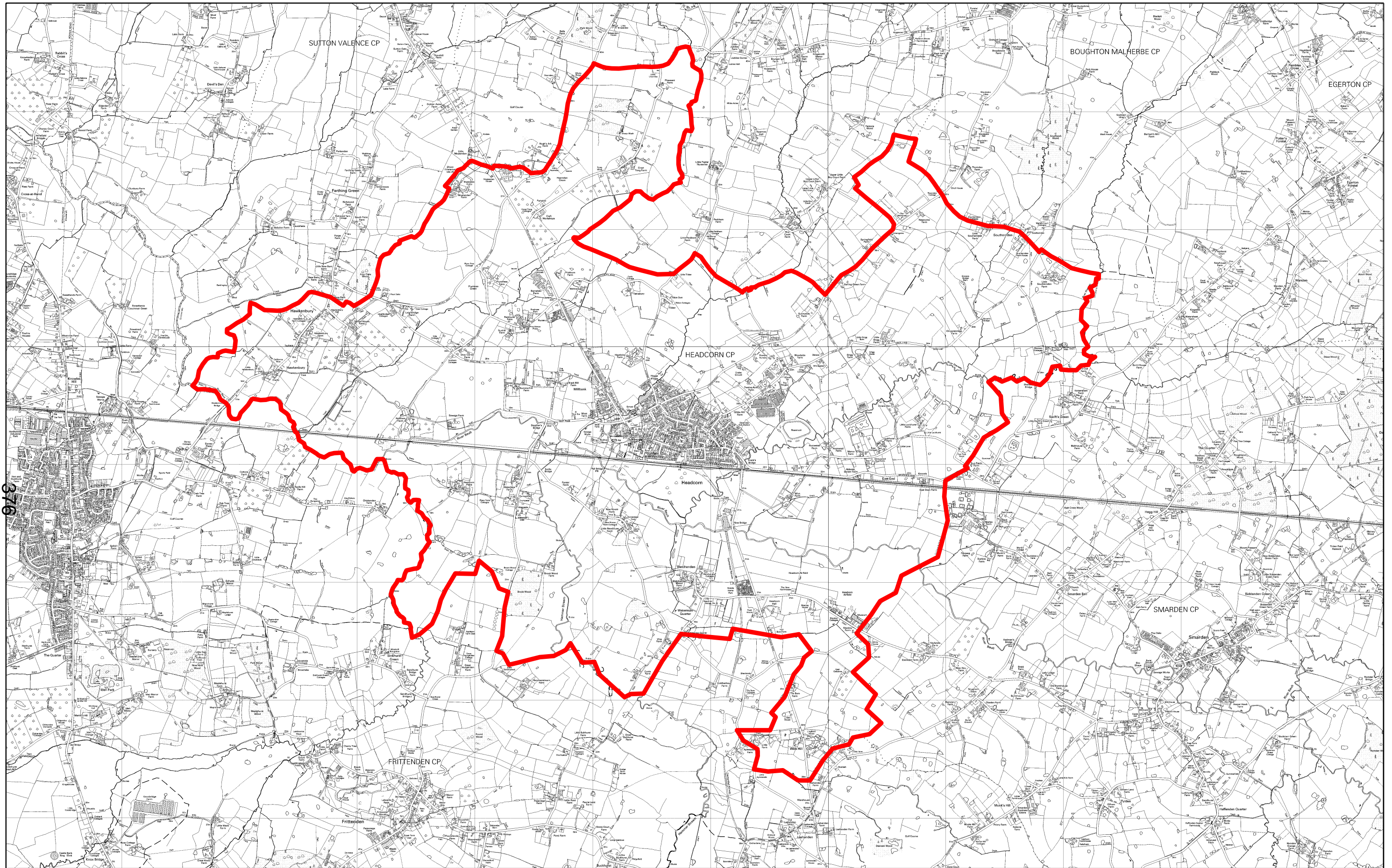
- Burgess, S, Briggs, A, McConnell, B and Slater, H (2006) "School choice in England: background facts", Centre for Market and Public Organisation, Working Paper No 06/159.
- Department for Communities and Local Government (2015) "Planning Policy for traveler sites", August 2015, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf).
- Driver, R (2014) "Analysing the sustainability of housing development in Headcorn: How much development would be sustainable?", Analytically Driven Ltd, [http://www.analytically-driven.com/uploads/2/7/8/1/27818525/sustainability\\_of\\_housing\\_development\\_in\\_headcorn\\_-\\_background\\_report\\_to\\_support\\_the\\_neighbourhood\\_plan\\_-\\_final\\_draft\\_-\\_december\\_2014.pdf](http://www.analytically-driven.com/uploads/2/7/8/1/27818525/sustainability_of_housing_development_in_headcorn_-_background_report_to_support_the_neighbourhood_plan_-_final_draft_-_december_2014.pdf).
- Halcrow Group Limited (2010) "Water Cycle Study", Maidstone Borough Council.
- JBA Consulting (2020) "Maidstone Borough Council Level 1 SFRA update and Level 2 SFRA: Final report", [https://localplan.maidstone.gov.uk/\\_data/assets/pdf\\_file/0004/372586/7-SFRA-Level-1-update-and-Level-2.pdf](https://localplan.maidstone.gov.uk/_data/assets/pdf_file/0004/372586/7-SFRA-Level-1-update-and-Level-2.pdf).
- Maidstone Borough Council (2021) "Headcorn Conservation Area: Conservation Area Appraisal and Management Plan", Draft October 2021.
- Maidstone Borough Council (2017) "Maidstone Borough Local Plan: Adopted 25 October 2017", [https://maidstone.gov.uk/\\_data/assets/pdf\\_file/0005/171149/Local-Plan-v2-November-2017.pdf](https://maidstone.gov.uk/_data/assets/pdf_file/0005/171149/Local-Plan-v2-November-2017.pdf).
- Maidstone Borough Council (2013) "Consultation draft: Maidstone Borough Council Green and Blue Infrastructure Strategy", [http://www.maidstone.gov.uk/\\_data/assets/pdf\\_file/0013/42421/Draft-Green-and-Blue-Infrastructure-Strategy-December-2013.pdf](http://www.maidstone.gov.uk/_data/assets/pdf_file/0013/42421/Draft-Green-and-Blue-Infrastructure-Strategy-December-2013.pdf)
- Manning, Alan, and Barbara Petrongolo. 2017. "How Local Are Labor Markets? Evidence from a Spatial Job Search Model." *American Economic Review*, 107 (10): 2877-2907.
- Ministry of Housing Communities & Local Government (2021) "National Planning Policy Framework", July 2021, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf).
- Therivel, R. (2015) "Sustainability appraisal of possible strategic development sites in Headcorn", Levett-Therivel, Headcorn Parish Council, (<http://www.headcornpc.kentparishes.gov.uk>).
- Sanderson (Consulting Engineers) Ltd (2015) "Headcorn foul drainage assessment", Sanderson Associates (Consulting Engineers) Ltd.



**Copyright:** © Headcorn Parish Council, 2024

**For more information contact:**

Headcorn Parish Council,  
Parish Office,  
Headcorn Village Hall,  
Church Lane,  
Headcorn,  
TN27 9NR  
Phone:01622 892496  
Email: [clerk@headcornpc.org.uk](mailto:clerk@headcornpc.org.uk)  
<https://headcornpc.org/>



# HEADCORN PARISH



Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office © Crown copyright.  
Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings.  
The Maidstone Borough Council Licence No. 100019636, 2011. NOT TO SCALE

**Planning and Healthier  
Stronger Communities Policy  
Advisory Committee**

**9th July 2024**

**Maidstone Local Cycling & Walking Infrastructure Plan**

<b>Timetable</b>	
<b>Meeting</b>	<b>Date</b>
Planning and Healthier Stronger Communities Policy Advisory Committee	9 <sup>th</sup> July 2024
Cabinet Member for Planning Policy and Management	12 <sup>th</sup> July 2024

<b>Will this be a Key Decision?</b>	No
<b>Urgency</b>	Not Applicable
<b>Final Decision-Maker</b>	Cabinet Member for Planning Policy and Management
<b>Lead Head of Service</b>	Karen Britton – Head of Spatial Planning & Economic Development
<b>Lead Officer and Report Author</b>	Tom Gilbert (Principal Planner – Spatial Planning).
<b>Classification</b>	Public
<b>Wards affected</b>	All

**Executive Summary**

This report sets out the progress on the development of a Local Cycling & Walking Infrastructure Plan for the Borough and seeks approval for a public consultation on the technically preferred cycling and walking routes following analysis and site audits.

The report will then go to the Cabinet Member for Planning Policy and Management for final approval.

**Purpose of Report**

Recommendation to the Cabinet Member for Planning Policy and Management.

**Choose from the below options:**

**This report makes the following recommendations to the Cabinet Member for Planning Policy & Management**

1. To approve the public consultation on the technically preferred cycling and walking routes for the Maidstone Local Cycling & Walking Infrastructure Plan.
-

# Maidstone Local Cycling and Walking Infrastructure Plan

## 1. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
<b>Impact on Corporate Priorities</b>	<p>The four Strategic Plan objectives are:</p> <ul style="list-style-type: none"> <li>• Embracing Growth and Enabling Infrastructure</li> <li>• Safe, Clean and Green</li> <li>• Homes and Communities</li> <li>• A Thriving Place</li> </ul> <p>We expect the recommendations will positively materially affect achievement of the corporate priorities as the LCWIP helps to deliver the Council's Strategic Plan.</p>	Karen Britton – Head of Spatial Planning & Economic Development
<b>Cross Cutting Objectives</b>	<p>The four cross-cutting objectives are:</p> <ul style="list-style-type: none"> <li>• Heritage is Respected</li> <li>• Health Inequalities are Addressed and Reduced</li> <li>• Deprivation and Social Mobility is Improved</li> <li>• Biodiversity and Environmental Sustainability is respected</li> </ul> <p>We expect the recommendations will positively materially affect achievement of the corporate priorities as the LCWIP helps to deliver the Council's Strategic Plan.</p>	Karen Britton – Head of Spatial Planning & Economic Development
<b>Risk Management</b>	Already covered in the risk section	Karen Britton – Head of Spatial Planning & Economic Development]
<b>Financial</b>	The proposal set out in the recommendation is to consult on the LCWIP is within already approved budgetary headings and so needs no new funding.	Section 151 Officer & Finance Team

<b>Staffing</b>	We will deliver the recommendations to consult on the LCWIP within our current staffing.	Karen Britton – Head of Spatial Planning & Economic Development]
<b>Legal</b>	<ul style="list-style-type: none"> <li>Local Cycling and Walking Infrastructure Plans (LCWIPs) flow from the Government’s 2017 strategy on cycling and walking. They are not mandatory but are the preferred method by which funding may be obtained.</li> <li>Consulting on the Maidstone LCWIP is within the Council’s powers under legislation and the Constitution.</li> </ul>	Deputy Head of Legal Partnership
<b>Information Governance</b>	The recommendations do not impact personal information (as defined in UK GDPR and Data Protection Act 2018) outside of existing Council processes for consultations.	Information Governance Team
<b>Equalities</b>	The recommendations do not propose a change in service therefore will not require an equalities impact assessment	Equalities & Communities Officer
<b>Public Health</b>	We recognise that the recommendations will have a positive impact on population health or that of individuals.	Karen Britton – Head of Spatial Planning & Economic Development
<b>Crime and Disorder</b>	There are no implications to Crime and Disorder	Karen Britton – Head of Spatial Planning & Economic Development
<b>Procurement</b>	The recommendation has no immediate impact on procurement.	Karen Britton – Head of Spatial Planning & Economic Development
<b>Biodiversity and Climate Change</b>	The implications of this report on biodiversity and climate change have been considered and align with “Action 1.1 Update the Integrated Transport Strategy, and work towards a Local Cycling and Walking Infrastructure Plan to prioritise walking, cycling, public transport,	Biodiversity and Climate Change Manager

	and electric vehicles” of the Biodiversity and Climate Change Action Plan.	
--	--	--

**2. INTRODUCTION AND BACKGROUND**

2.1 Local Cycling and Walking Infrastructure Plans (LCWIPs), as set out in the Government’s Cycling and Walking Investment Strategy (2017), are a new, strategic approach to identifying cycling and walking improvements required at the local level. LCWIPs provide a long-term approach to developing local cycling and walking networks, usually over a 10-year period. This is supported by the National Planning Policy Framework 2023 (NPPF) paragraph 110 (d).

2.2 The key outputs of LCWIPs, as set out in the Government guidance are:

- A network plan for walking and cycling which identifies preferred routes and core zones for further development;
- A prioritised programme of infrastructure improvements for future investment; and
- A report which sets out the underlying analysis carried out and provides a narrative which supports the identified improvements and network.

2.3 LCWIPs are intended to assist Local Authorities to:

- Identify priority cycling and walking infrastructure improvements for future investment in the short, medium and long term;
- Ensure that consideration is given to cycling and walking within both local planning and transport policies and strategies; and
- Make a case for future funding for walking and cycling infrastructure.

2.4 The Government’s Second Cycling and Walking Investment Strategy (CWIS2) outlines the objectives and financial resources for the period April 2021 to March 2025. This strategy aims to make walking and cycling a natural choice for shorter journeys or as part of a longer journey by 2040 reiterating the importance of walking and cycling as transport modes.

2.5 The Government has stated that although LCWIPs are not mandatory plans for Local Authorities, they are the preferred strategy to have in place when submitting funding bids. Therefore, MBC seeks to have LCWIPs in place to optimise funding opportunities.

2.6 Kent County Council are also developing a county wide Kent Cycling & Walking Infrastructure Plan (KCWIP). KCC consulted on this between November 2023 and January 2024. This is independent of the Maidstone LCWIP and one does not lead from the other.

2.7 An LCWIP consists of 6 stages set out in figure 1 below.

Stage	Name	Description
1	<b>Determining Scope</b>	Establish the geographical extent of the LCWIP, and arrangements for governing and preparing the plan.
2	<b>Gathering Information</b>	Identify existing patterns of walking and cycling and potential new journeys. Review existing conditions and identify barriers to cycling and walking. Review related transport and land use policies and programmes.
3	<b>Network Planning for Cycling</b>	Identify origin and destination points and cycle flows. Convert flows into a network of routes and determine the type of improvements required.
4	<b>Network Planning for Walking</b>	Identify key trip generators, core walking zones and routes, audit existing provision and determine the type of improvements required.
5	<b>Prioritising Improvements</b>	Prioritise improvements to develop a phased programme for future investment.
6	<b>Integration and Application</b>	Integrate outputs into local planning and transport policies, strategies, and delivery plans.

*Figure 1. LCWIP Process DfT Guidance*

### **What has happened so far?**

- 2.8 In December 2023 Maidstone Borough Council was awarded money to develop an LCWIP by Active Travel England Capability Fund via Kent County Council.
- 2.9 Once the funding was awarded the Council appointed the consultants AECOM to develop the LCWIP for the entire borough. AECOM have a wide range of experience developing these strategies, most recently working on Folkestone & Hythe District Council's LCWIP and the Kent Cycling & Walking Infrastructure Plan for Kent County Council.
- 2.10 What has happened to date is the following: data gathering (including a review of proposed development locations from the Local Plan Review, existing trip generating activities, such as schools, leisure centres and existing walking & cycling routes), then the identification of potential walking zones and cycling routes. At this stage key stakeholders (including KCC, Maidstone Cycle Campaign Forum and other walking and cycling organisations) were engaged to provide technical feedback on the routes. For cycling this involved the creation of clusters for origins and destinations and then the classification of desire lines into primary, secondary and tertiary routes based on
- 2.11 Following this the routes have been refined and prioritised using technical parameters (including anticipated flows, origin and destination sizes) The prioritised routes resultant from this work form part of the consultation.
- 2.12 This provided nine cycling routes including in no order (see appendix 2):
- Ashford to Maidstone
  - Lidsing to Maidstone



- Langley to Maidstone
- Boughton Monchelsea to Shepway
- Bearsted to Marden
- Tovil to Newnham Park
- Peneden Heath to Cornwallis Academy
- Downswood to Newnham Park
- Tovil to North Shepway

2.13 Similarly for the walking routes the walking zones were established and walking routes established in those zones that scored the highest based on origin and destination. As a result, nine prioritised routes were established (see appendix 1); including:

- Barming to Maidstone
- Bearsted to Maidstone West Railway Station
- Invicta Park to Maidstone Grammar School
- Weaving to Bearsted
- Bearsted Railway Station to Woodcut Farm
- Harrietsham to Heathlands Garden Community
- Headcorn Railway Station to employment allocation EMP1(1)
- Coxheath to Shepway
- Tovil to Maidstone Barracks Railway Station

**What is to be consulted on?**

2.14 The forthcoming consultation will focus on the identified 8 priority cycling routes (please see appendix 2) and 9 priority walking routes (please see appendix 1) in the Borough.

2.15 The Council is seeking views on these routes. The consultation will take the form of an online consultation utilising the Council's 'Let's Talk' platform and will use the PDF versions of the routes identified in appendices 1 & 2 of this committee report plus a questionnaire. The website will also be using a mapping system to display the proposed routes so that people can attach their comments to specific points on the identified routes as well.

**3. AVAILABLE OPTIONS**

- 3.1 Option 1 – to not approve the consultation of the LCWIP.
- 3.2 Option 2 – to approve the consultation of the LCWIP and give the Head of Spatial Planning & Economic Development delegated authority to finalise the consultation wording and website graphics.

**4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

**4.1** Option 2 – Option 2 – to approve the consultation of the LCWIP and give the Head of Spatial Planning & Economic Development delegated authority to finalise the consultation wording and website graphics as this will enable the consultation to be commenced expediently.

## **5. RISK**

- 5.1 The risks associated with this proposal, including the risks if the Council does not act as recommended, have been considered in line with the Council's Risk Management Framework. We are satisfied that the risks associated are within the Council's risk appetite and will be managed as per the Policy.

## **6. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK**

- 6.1 N/A
- 

## **7. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION**

- 7.1 If the recommendation is agreed, then the report will go to the Cabinet Member for Planning Policy and Management for approval and the consultation will commence on the 22<sup>nd</sup> July for 4 weeks closing on the 19<sup>th</sup> August 2024.
- 7.2 The responses from the consultation will then be collated and reviewed and a final LCWIP drafted and brought back to members and the cabinet member for approval in Autumn 2024.
- 

## **8. REPORT APPENDICES**

The following documents are to be published with this report and form part of the report:

- Appendix 1: Maidstone LCWIP Proposed Priority Walking routes.
  - Appendix 2: Maidstone LCWIP Proposed Priority Cycling routes.
  -
- 

## **9. BACKGROUND PAPERS**

None

## PROJECT

Maidstone Local Cycling and Walking Infrastructure Plan

## CLIENT

Maidstone Borough Council

## CONSULTANT

AECOM Limited  
Marlborough Court  
10 Bricket Road  
St Albans, AL1 3JX, UK  
T +44-1727-53-5000  
www.aecom.com

## LEGEND

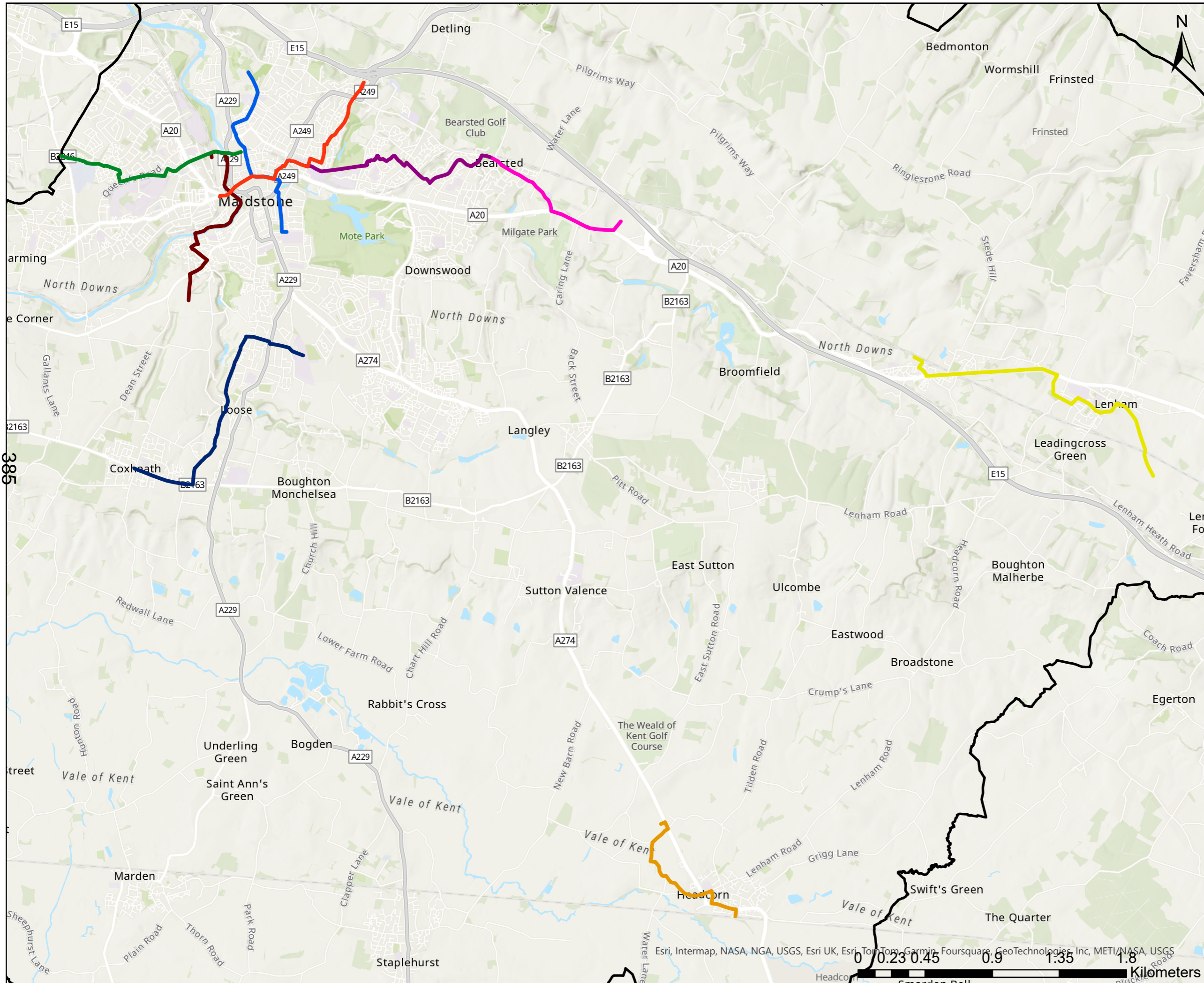
-  Route 1 - Barming to Maidstone East
-  Route 2 - Bearsted to Maidstone West
-  Route 3 - Invicta Park to Maidstone Grammar School
-  Route 4 - Weaving to Bearsted
-  Route 5 - Bearsted Employment Site to Station
-  Route 6 - Harrietsham to Lenham
-  Route 7 - Headcorn Town Centre
-  Route 8 - Coxheath to Shepway
-  Route 9 - Tovil to Maidstone Barracks
-  Maidstone Boundary

## NOTES

1: [Contains OS data © Crown copyright and database right 2022]

## ISSUE PURPOSE

FINAL



This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or relied upon by third parties, except as agreed by AECOM or as required by law. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that uses or relies on this drawing without AECOM's express written consent. All measurements must be obtained from the stated dimensions.

## PROJECT

Maidstone Local Cycling and Walking Infrastructure Plan

## CLIENT

Maidstone Borough Council

## CONSULTANT

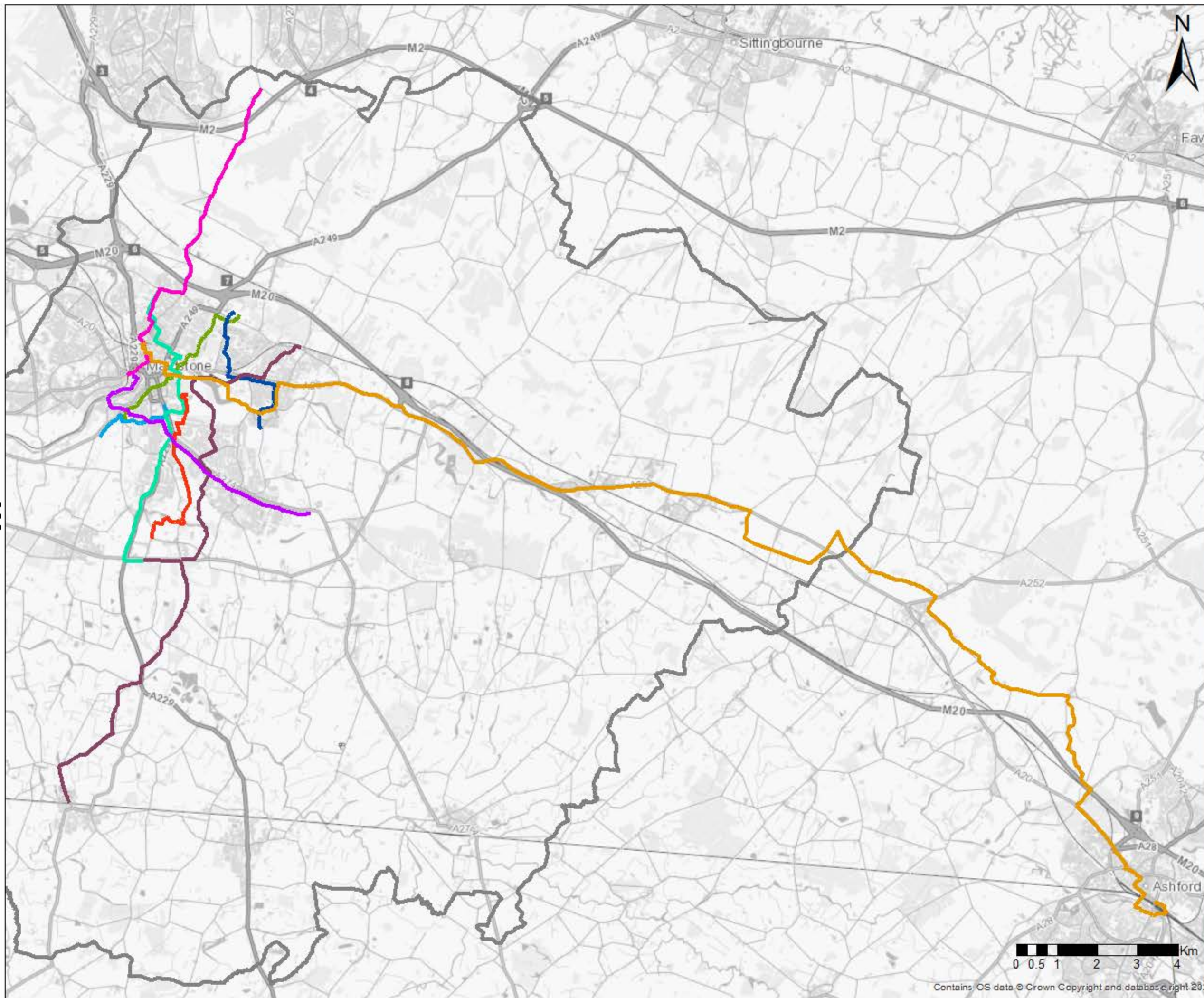
AECOM Limited  
Marlborough Court  
10 Bricket Road  
St Albans, AL1 3JX, UK  
T +44-1727-53-5000  
www.aecom.com

## LEGEND

-  Study Area
-  Route 20 - Ashford to Maidstone
-  Route 18 - Lidsing to Maidstone Town Centre
-  Route 16 - Langley to Maidstone Town Centre
-  Route 15 - Boughton Monchelsea to Shepway
-  Route 14 - Bearsted to Marden via Loose
-  Route 11 - Peneden Heath to Cornwallis Academy
-  Route 10 - Downswood to Maidstone Medical Campus
-  Route 9 - Tovil to North Shepway
-  Route 8 - Tovil to Maidstone Medical Campus

## NOTES

Contains OS Data © Crown Copyright and database right 2020



**Planning and Healthier  
Stronger Communities Policy  
Advisory Committee**

**09 July 2024**

**Kent Mineral Sites Plan Regulation 18 - Updated Response**

<b>Timetable</b>	
<b>Meeting</b>	<b>Date</b>
Planning and Healthier Stronger Communities Committee	09/07/2020

<b>Will this be a Key Decision?</b>	No
<b>Urgency</b>	Not Applicable
<b>Final Decision-Maker</b>	Cabinet member for Planning Policy and Management
<b>Lead Head of Service</b>	Karen Britton (Head of Spatial Planning and Economic Development)
<b>Lead Officer and Report Author</b>	Thom Hoang (Principal Planning Officer)
<b>Classification</b>	Public
<b>Wards affected</b>	All

**Executive Summary**

This report provides an update on the ongoing review of the Kent Mineral Sites Plan by Kent County Council. It explains the role and status of the Sites Plan and its relation to the Kent Minerals and Waste Local Plan (KMWLP) 2013-30, summarising the actions that have been taken to date, and highlighting key matters that are of relevance to Maidstone Borough Council.

It recommends that members agree an updated response to the previous consultation, as drafted by officers and appended to this report.

**Purpose of Report**

To inform members of the progress involved to update the Kent Mineral Sites Plan, the actions that have been taken to date, and to seek agreement to sign off the updated response (appended to this report).

**This report makes the following recommendation to the Committee**

1. That Members note the role, status and the progress regarding the update to the Kent Mineral Sites Plan by Kent County Council.
  2. That Members note the actions taken to date in providing Maidstone Borough Council's input to the Kent Mineral Sites Plan.
  3. That Members resolve to recommend agreement of the draft updated response to the Cabinet Member for Planning Policy and Management at Appendix 1 of this report.
-

# Kent Mineral Sites Plan Regulation 18 - Updated Response

## 1. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
<b>Impact on Corporate Priorities</b>	<p>The four Strategic Plan objectives are:</p> <ul style="list-style-type: none"> <li>• Embracing Growth and Enabling Infrastructure</li> <li>• Safe, Clean and Green</li> <li>• Homes and Communities</li> <li>• A Thriving Place</li> </ul> <p>Accepting the recommendation will enable the Council to ensure that plans at county council level do not materially harm its ability to achieve each of the corporate priorities.</p>	Head of Spatial Planning & Economic Development
<b>Cross Cutting Objectives</b>	<p>The four cross-cutting objectives are:</p> <ul style="list-style-type: none"> <li>• Heritage is Respected</li> <li>• Health Inequalities are Addressed and Reduced</li> <li>• Deprivation and Social Mobility is Improved</li> <li>• Biodiversity and Environmental Sustainability is respected</li> </ul> <p>The recommendation supports the achievement of the objectives, in particular Biodiversity and Environmental Sustainability is respected.</p>	Head of Spatial Planning & Economic Development
<b>Risk Management</b>	The recommendation seeks to ensure that plans produced by the county council are not in conflict with our own plans and government policy.	Head of Spatial Planning & Economic Development
<b>Financial</b>	There are no direct financial implications of the recommendation.	Section 151 Officer & Finance Team
<b>Staffing</b>	This recommendation has been prepared with our current staffing.	Head of Spatial Planning & Economic Development

<b>Legal</b>	<p>As part of its duty to co-operate, Maidstone Borough Council (MBC) must engage constructively, actively and on an ongoing basis with Kent County Council (KCC) in the preparation of development plan documents in order to maximise the effectiveness of the activity of plan preparation.</p> <p>KCC consulted MBC on the proposed review of the Kent Mineral Sites Plan during June to July 2023, which also forms part of MBC's Local Development Plan. MBC provided responses to this Regulation 18 consultation.</p> <p>There are no legal implications arising from the response; accepting the recommendation will help fulfil the Council's duties under s.33A of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations (2012) as amended.</p>	Legal Team
<b>Information Governance</b>	Accepting the recommendation will not increase the volume of data held by the Council.	Information Governance Team
<b>Equalities</b>	The recommendations do not propose a change in service therefore will not require an equalities impact assessment.	Senior Policy and Communities Officer
<b>Public Health</b>	No implications identified.	Head of Spatial Planning & Economic Development
<b>Crime and Disorder</b>	The recommendation will not have a negative impact on Crime and Disorder.	Head of Spatial Planning & Economic Development
<b>Procurement</b>	N/A	Head of Spatial Planning & Economic Development
<b>Biodiversity and Climate Change</b>	The implications of this report on biodiversity and climate change have been considered. This report and the key changes proposed align with the broad aims of the Biodiversity	Biodiversity and Climate

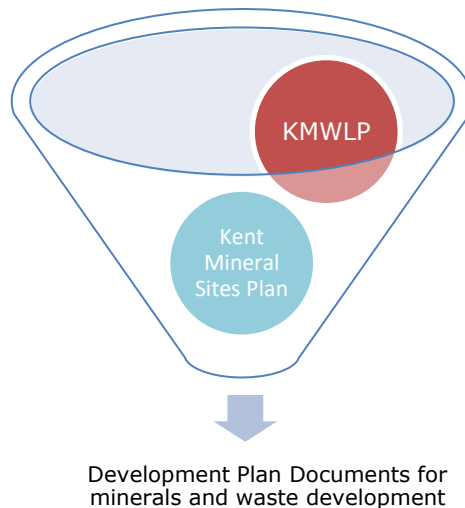


	and Climate Change Action Plan and promotion of waste reduction and circular economy.	Change Officer
--	---	----------------

## 2. INTRODUCTION AND BACKGROUND

### A. Background

- 2.1 The Development Plan Documents that govern minerals and waste development in Maidstone are:
- the [KMWLP 2013 to 2030 as amended by the Early Partial Review](#) adopted in 2020; and
  - Kent Mineral Sites Plan adopted in 2020.



- 2.2 The KMWLP sets out strategic policies for minerals and waste development and development management policies which are used to determine planning applications. A new review of the KMWLP is currently ongoing and is subject to a separate report.
- 2.3 The Kent Mineral Sites Plan on the other hand allocates sites in Kent which are suitable for quarrying essential minerals. This is a daughter document to the KMWLP and should be read in conjunction with it. The sites allocated by this Plan will only be developed if planning applications for their development are made and KCC is satisfied that such applications show that the minerals will be worked in a way that does not cause unacceptable harm to the environment or communities.
- 2.4 The graph below summarises the procedures involved to review the Kent Minerals Sites Plan and where Maidstone Borough Council (MBC) will be able to provide inputs.

MINERAL SITES PLAN  
REVIEW PROGRESS

PROCEDURES TO REVIEW THE  
DOCUMENTS AND WHERE MBC  
CAN INPUT (CHECKED)

- First Call for Sites  
October to December  
2022
- Reg 18 consultation on  
Site Options June to July  
2023
- Second Call for Sites  
August to October 2023
- Potential further Reg 18  
consultation (to be confirmed)



WE ARE HERE

- Reg 19 consultation

- Submission

- Examination

- Adoption

Evidence  
gathering



Regulation 18  
consultation



Regulation 19  
consultation



Submission



Examination



Adoption



## **B. Progress on the proposed review of the Kent Mineral Sites Plan**

- 2.5 KCC's evidence for the emerging KMWLP Review indicated that only additional capacity is needed for hard rock over the new plan period. Therefore, an update to the Kent Mineral Sites Plan was proposed with the intention to allocate a site or sites for the extraction of hard rock.
- 2.6 **Between October to December 2022**, KCC launched the first Call for Sites. One site was nominated for the proposed extraction of hard rock. This is the land to the south and west of the existing Hermitage Quarry.
- 2.7 **In June 2023**, KCC launched a Regulation 18 consultation on the amendments to the Kent Mineral Sites Plan – Nominated Hard Rock site allocation (in addition to the further changes to the KMWLP review).
- 2.8 **Between August to October 2023**, to exhaust all options, KCC launched another Call for Sites. Results from this Call for Sites are not yet available.
- 2.9 It should be noted that the Mineral Sites Plan review progress is subject to the KMWLP Review being found sound and adoption. In other words, the review process of the Kent Mineral Sites Plan is contingent on the KMWLP Review outcome.
- 2.10 No decision on the suitability of the extension at Hermitage Quarry has been reached yet by KCC. The site is subject to ongoing detailed technical assessment.
- 2.11 At this stage, MBC still has opportunities to comment further on the proposed update to the Kent Mineral Sites Plan. This can be achieved through an updated response to KCC now, reflecting the current administration's position, and via consultation responses when KCC decides to undertake further consultation on the Kent Mineral Sites Plan.

## **C. Maidstone's previous responses to the Kent Mineral Sites Plan**

- 2.12 Maidstone Borough Council provided responses to the aforementioned Regulation 18 consultation, expressing its views at the time.
- 2.13 **On 09 August 2023**, a [draft response was sent to KCC](#) by the Cabinet Member for Planning, Infrastructure and Economic Development to meet the consultation deadline. As part of this letter, MBC noted that that these would be subject to formal ratification and that a full formal response be provided at a later date. The draft response highlighted that the proposed allocation lies within an area designated as Local Wildlife Site and categorised as ancient woodland. It requested that any permission be subject to conditions requiring the reinstatement of habitats following completion of extraction. Additionally, the site also lies within proximity to a Site of Special Scientific Interest (SSSI); MBC therefore requested that mitigations be put in place to prevent adverse impact on the SSSI.
- 2.14 **On 06 September 2023**, the draft response was considered by the Planning, Infrastructure and Economic Development Policy Advisory

Committee (PIED PAC). At this PIED PAC, Committee members raised a number of concerns with regards to the extension of the quarry, principally these rested on the impact that the development would have on the ancient woodland and environmental impacts. Members additionally expressed concerns that the Kent Mineral Sites Plan and associated evidence base provide insufficient information with respect to the exceptional circumstances to demonstrate that the impact on ancient woodland would be outweighed by the need to identify local sites for the extraction of hard rock.

- 2.15 In light of the PIED PAC feedback, an alternative recommendation was made: That the letter be withdrawn, and a new letter sent in its place using the wording provided by the woodland trust of: 'given unacceptable habitat lost, MBC are unable to support the proposed quarry extension'.
- 2.16 **On 07 September 2023**, the Cabinet Member for Planning, Infrastructure and Economic Development then signed off a [formal letter](#) which was then sent to Kent County Council. This letter raised concerns that the proposed allocation lies within an area designated as a Local Wildlife Site and ancient woodland, but noted that it is for the County Council to demonstrate that there exists exceptional circumstance that would meet policies set out in the NPPF, and should this be demonstrated then maximum mitigation and restoration of the site to prevent the site coming forward for residential development will be expected. It also noted that the extended allocation also lies within close proximity to a SSSI, and MBC requested that should the site be included in the adopted plan then policy should require that mitigations be put in place to prevent adverse impact on this designation.
- 2.17 **On 19 September 2023**, the decision was then called in to the Overview and Scrutiny Committee. However, the Committee resolved to approve Option 1 of the report, that no further action was required.
- 2.18 **On 23 November 2023**, a motion to the Full Council was given which reads: "This Council states that Hermitage Quarry should not be further extended into Oaken Wood in Barming, an irreplaceable ancient woodland, and asks that the Cabinet reconsider its support for KCC's plans". It was resolved that the motion be referred directly to the Cabinet for consideration.
- 2.19 **On 20 December 2023**, at the Cabinet meeting, members highlighted that this issue should be considered in the future to allow for more complete responses. It was also suggested that the existing, additional response and future opportunities to comment throughout the consultation process mitigated the need for the Motion. No action was on the motion.

#### **D. Existing Hermitage Quarry site**

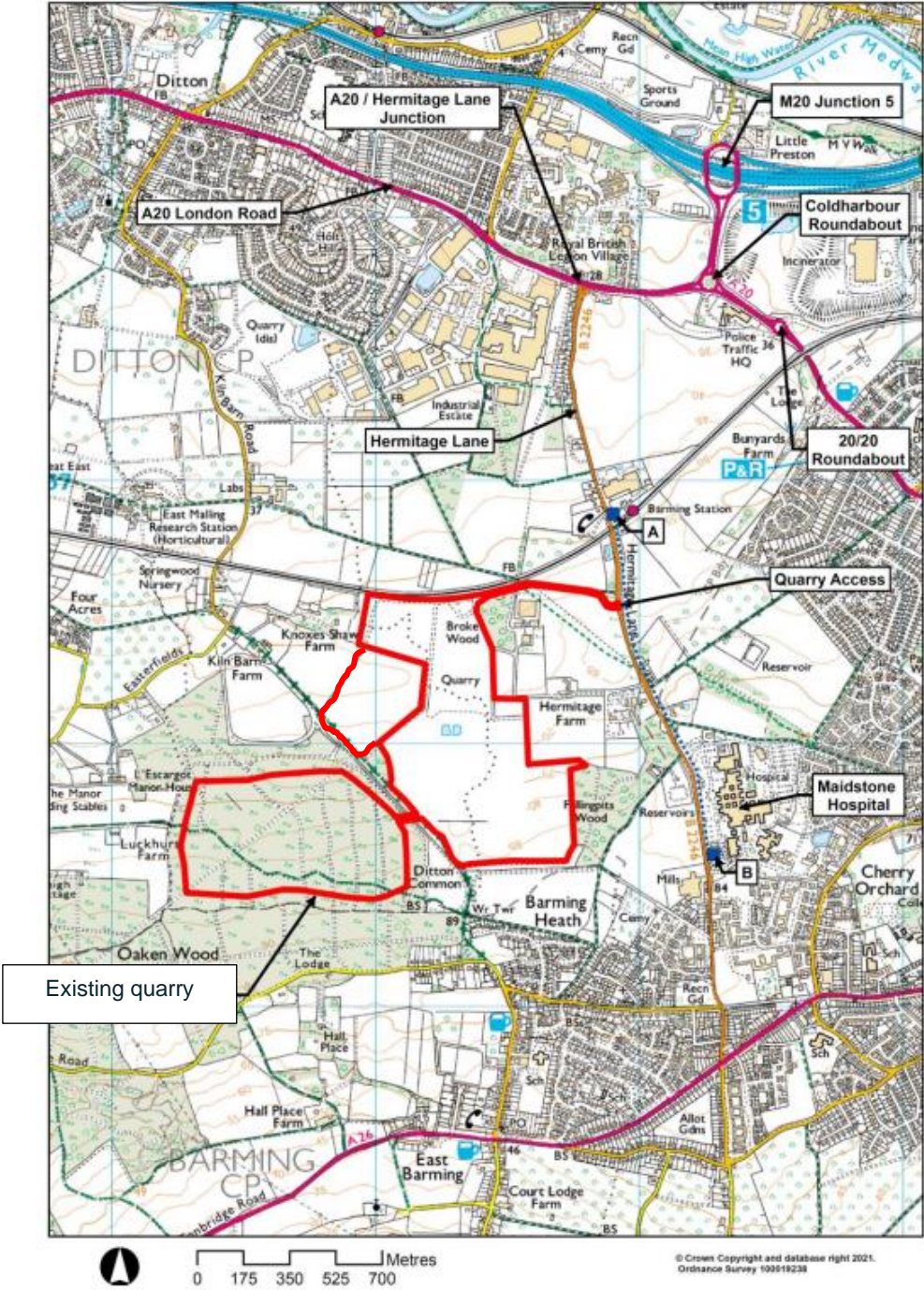
- 2.20 This section provides background information on the existing Hermitage Quarry site.

**Location:** Hermitage Lane, near to Junction 5 of the M20

**Operator:** Gallagher Aggregates

**Products:** Over 70 products including ragstone, primary and recycled aggregates, ready mix concrete, soils and dimension stone. Hermitage Quarry is one of only two quarries in Southeast England which produce hard rock quarry products.

**Figure 1: The location of the existing quarry**



- 2.21 Text from [Kent Minerals and Waste Local Plan 2013 to 2030 as amended by the Early Partial Review](#) reads:

*5.9.1 Only two ragstone quarries have consented reserves at the time of the preparation of this Plan: Hermitage Quarry and Blaise Farm in mid Kent. Although building stone has been produced from both quarries, only Hermitage Quarry has the ability to produce high-quality cut stone from the full sequence of ragstone beds in the Hythe Formation, and it continues to provide building stone for building conservation uses. [...]*

- 2.22 Planning permission for mineral working at Hermitage Quarry was first granted for the "Original Quarry" in 1989 and quarrying began in 1990. Hermitage Quarry has since been subject to a number of extensions:

- a. the "Southern Extension" (1996);
- b. the "Western Extension" (1999);
- c. the "Eastern Extension" (2005); and
- d. the "Westerly Extension" (2013).

- 2.23 Of these, the Westerly Extension covers some 33 hectares (78 acres) and forms 14% of the overall total of Oaken Wood ancient woodland coverage at the time.

## **E. The nominated extension site**

- 2.24 Hermitage Quarry extension was nominated for around 20 million tonnes of hard rock extraction through the 'Call for Sites' process. This is against the identified shortfall of 17.382 million tonnes of hard rock over the Plan period.

**Estimated Mineral Reserve:** Promoter suggests circa 20 million tonnes of Ragstone (hard rock)

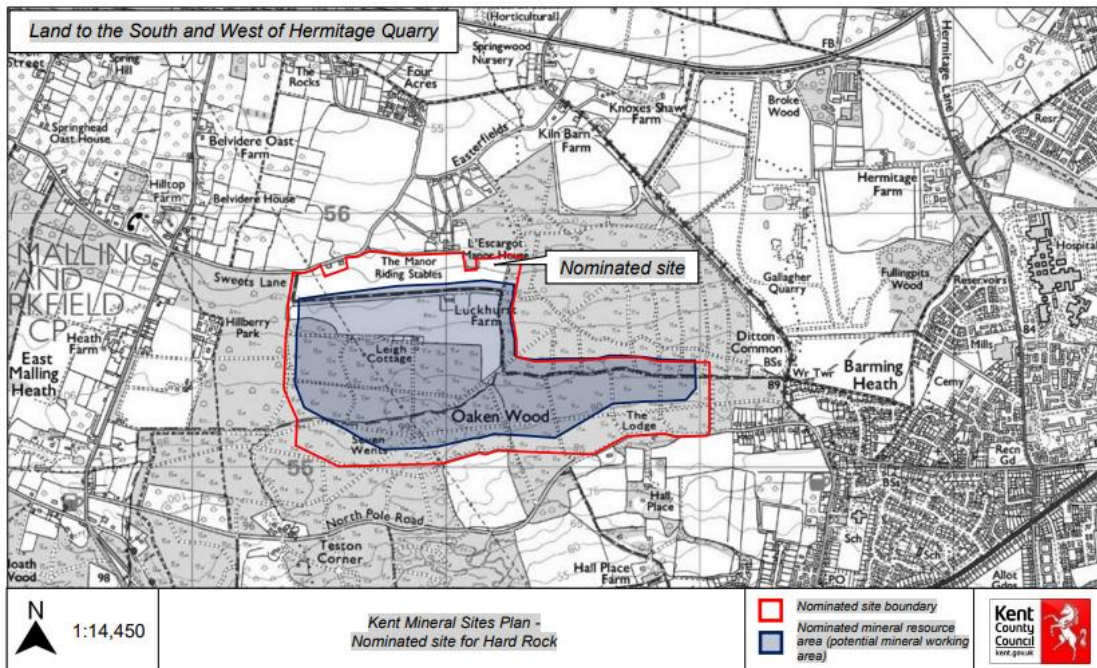
**Total area:** 96 hectares from within which the promoter suggests an area of up to 64 hectares could be worked, subject to planning constraints

**Existing Land Use:** Meadow and woodland

**Proposed Restoration:** The promoter suggests at the end of its life, the quarry would be restored to original levels with inert restoration materials (circa 500,000 tonnes per annum) and returned to mixed native woodland and meadow, subject to biodiversity net gain requirements.

**Access:** existing access road off Hermitage Lane.

**Figure 2: The nominated hard rock site at Hermitage Quarry extension**



The red line boundary shows land within the control of the promoter. This area includes indicative stand-offs and buffers between the nominated mineral working area (blue shaded area) and adjacent land uses.

The blue shaded area shows land nominated as known mineral resource which is considered by the promoter as suitable for extraction.

38

## F. Partial loss of and disturbance on Oaken Wood ancient woodland

2.25 The nominated site represents a loss to parts of Oaken Wood ancient woodland. Despite being replanted with non-native trees, Oaken Wood retains its ancient woodland characteristics, summarised below.

### Figure 3: Benefits of ancient woodland<sup>1</sup>

The longevity and historical management of ancient woods have given rise to rich, distinctive communities of plants and animals, some of which are of international importance.

Ancient woodland soils are relatively undisturbed, and may preserve distinct species communities and natural ecological processes, such as decomposition and nutrient cycling.

Ancient woods are often high in biodiversity, which can enhance the value of environmental and social wellbeing benefits of woods.

The soils and veteran (ancient) trees in ancient woods are important carbon stores and may help to reduce net carbon emissions.

<sup>1</sup> <https://researchbriefings.files.parliament.uk/documents/POST-PN-465/POST-PN-465.pdf>

Ancient woods are a rich historical, cultural and symbolic resource. They often contain archaeological relicts of previous ways of life, such as hearths or kilns. Veteran trees are also archaeological relicts, as their age and structure are often a result of past human use.

Like all green spaces, woods provide a range of social benefits for humans, including improving physical and mental wellbeing.

All woods, including ancient and recently planted woods, can contribute to flood mitigation, fuel production, carbon sequestration and reduction of air and noise pollution.

2.26 This partial loss of Oaken Wood may therefore cause significant ecological disturbances, leading to habitat fragmentation. This fragmentation may disrupt wildlife corridors, reduce biodiversity, and affect species that rely on large, continuous habitats. The interconnected network of ancient woodlands in this area (which is important for maintaining ecological balance) could become increasingly vulnerable, endangering the resilience of these ecosystems to environmental changes and human impacts.

2.27 Although ancient woodland is a categorisation rather than a designation, as per the NPPF definitions below, ancient woodlands are irreplaceable habitats that take at least 400 years to establish:

*Ancient woodland: An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites.*

*Irreplaceable habitat: Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.*

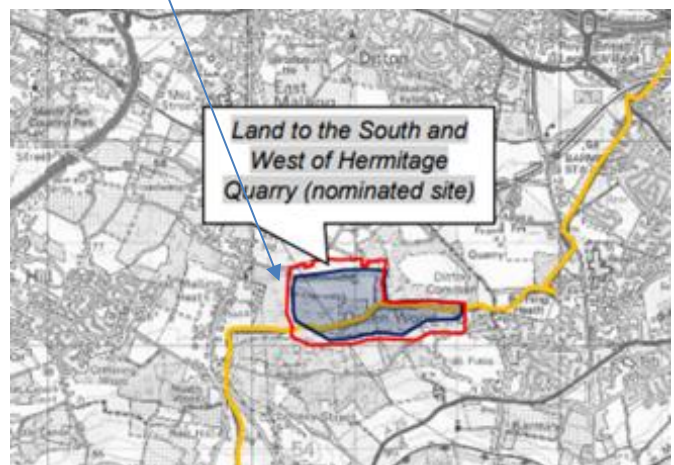
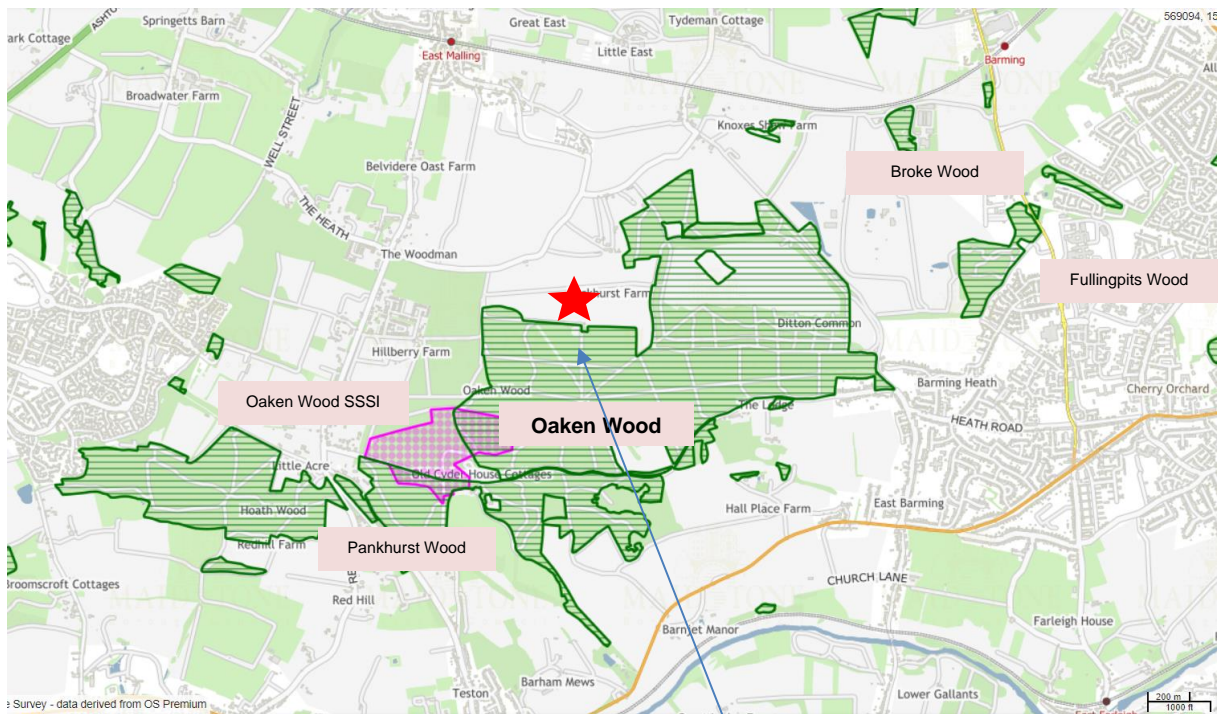
2.28 The Woodland Trust states that ancient woodland now only covers 2.5% of the UK land, raising the need to protect them.

2.29 Any development on this nominated extension site will need to demonstrate 'wholly exceptional reasons' as per the NPPF, 186(c):

*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;*



**Figure 4: Location of the nominated site in relation to Oaken Wood ancient woodland**



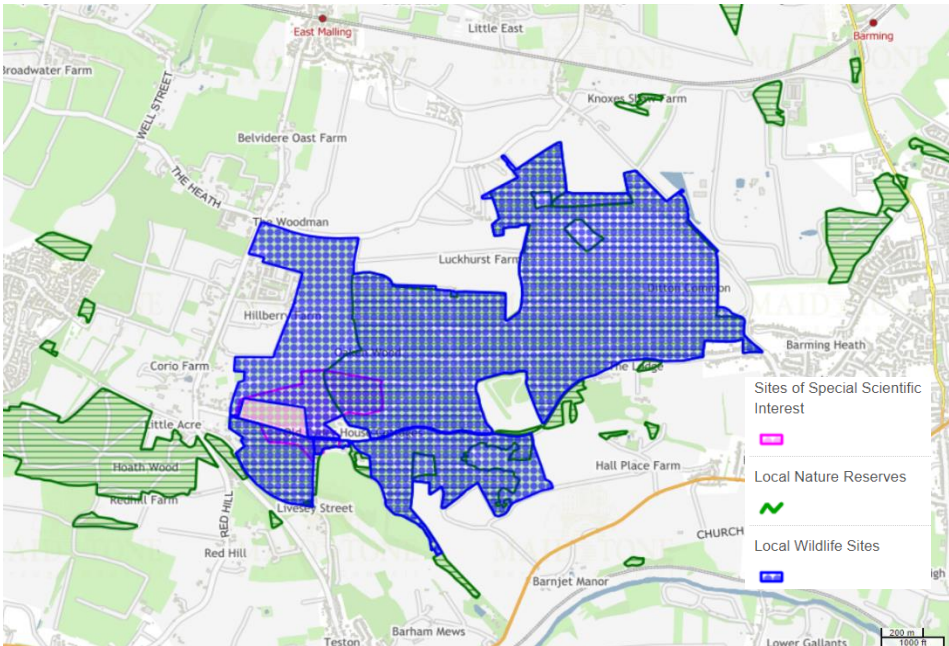
**G. Partial loss of and impacts on Oaken Wood Local Wildlife Site**

- 2.30 A large part of the nominated extension lies within the Oaken Wood Local Wildlife Site (LWS) designation.
- 2.31 Subsequently, this partial loss of the LWS is likely to cause further ecological disturbances to the remaining area of the LWS as discussed in paragraph 2.25 above.
- 2.32 Policy LPRSP14(A) Natural Environment of the Local Plan Review 2021-38 reads:

*Development proposals will enhance, extend and connect habitats to enhance the borough's network of sites that incorporates designated sites of importance for biodiversity, priority habitats, Local Wildlife Sites and fragmented Ancient Woodland; [...]*

- 2.33 As such, in principle, the allocation and development of the nominated site is in conflict with this policy.

**Figure 5: Map of Oaken Wood SSSI and Oaken Wood Local Wildlife Site**



**G. The risk of deteriorating Oaken Wood SSSI**

- 2.34 The nominated extension lies within close proximity to Oaken Wood Site of Special Scientific Interest (SSSI) which is of geomorphological importance. Only 21 out of the 98 SSSIs in Kent were designated for geological interest, highlighting the importance to preserve the condition of Oaken Wood SSSI.

2.35 The reasons for its designation in 1985 read:

*"Oaken Wood is a key geomorphological site. It provides the best example in Britain of ridge and trough topography produced by intense cambering and gulling during the Pleistocene (tilting and cracking of surface rock outcrops by periglacial processes or deformation of underlying weaker strata). The ridge crests rise up to 8 m above the level of the trough floors, which extend for about 0.5 km in an eastwest direction. This unusual type of topography is confined to the Maidstone area and the north Cotswolds and is most spectacularly developed at Oaken Wood."*<sup>2</sup>

2.36 Given the potential processes of hard rock extraction, the risk of adverse effects on the geomorphological SSSI site should be robustly considered, should any hard rock extraction activities on the nominated site be allocated/ proposed.

2.37 It is worth noting that SSSI is a statutory designation, this offers SSSI sites the strongest legal protection from loss and deterioration.

2.38 The NPPF paragraph 186b states that:

*development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*

## **H. Hard rock extraction activities and their environmental risks**

2.39 Hard rock extraction can include activities such as drilling, blasting, washing, and crushing, among others. Should any hard rock extraction activities on the nominated site be allocated/ proposed then the environmental risks, such as ecology disturbance, landform destabilisation, erosion, sedimentation, hydrological and drainage impact and pollution need to be fully considered.

## **I. Alternative options to meet hard rock needs as of July 2024**

2.40 No other site for the extraction of hard rock has been identified or come forward in the first Call for Sites undertaken in 2022; results from the second Call for Sites are not yet available.

---

<sup>2</sup> Natural England's website, accessible online [here](#) and [here](#)

- 2.41 An alternative option that KCC will need to consider is not to allocate the site but instead to rely on imports of hard rock from outside of the county, which may come into Kent by sea, rail or road. This was appraised as a reasonable alternative to the nominated site by the Sustainability Appraisal. Part of this reads:

*Data from the Aggregate Minerals Survey 2019 indicates that all of the hard rock sourced from Kent is destined for markets in the south east of England, with 40-50% of that within Kent and Medway. Hard rock consumed within Kent and Medway is also imported from elsewhere, with 50-60% of that coming from outside England and Wales. As an alternative to sourcing hard rock from within Kent, clearly importation of hard rock to meet local needs in Kent and Medway and the wider South East of England will increase the need for the transport of mineral and associated emissions to air.*

---

### **3. AVAILABLE OPTIONS**

- 3.1 Option 1: That members note this report and recommend to agree the updated response at appendix 1 of this report to the Cabinet Member for Planning Policy and Management, which reflects the new administration's position on this matter. This updated response will then be subject to a decision by the Cabinet Member for Planning Policy and Management in order that it may be sent to KCC, so that they are informed of MBC's updated position as soon as possible, prior to KCC progressing the proposed Kent Mineral Sites Plan review further.
- 3.2 Option 2: That members note this report and recommend further changes to the updated response at appendix 1 to further reflect their position on this matter. This amended response will then be considered by the Cabinet Member for Planning Policy and Management in order that it may be sent to KCC so that they are informed of MBC's updated position as soon as possible, prior to KCC progressing the proposed Kent Mineral Sites Plan review further.
- 3.3 Option 3: That members recommend not to agree the updated response to the Cabinet Member for Planning Policy and Economic Development, who will then consider the position and decide whether a response will be sent to KCC. There will still be further opportunities to provide input at the later consultation stages of the proposed Kent Mineral Sites Plan review.

---

### **4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

- 4.1 For the reasons set out above, it is recommended that Option 1 is followed.

## **5. RISK**

- 5.1 The risks associated with this proposal, including the risks if the Council does not act as recommended, have been considered in line with the Council's Risk Management Framework. We are satisfied that the risks associated are within the Council's risk appetite and will be managed as per the Policy.

## **6. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK**

- 6.1 Discussed in Section 2B and 2C above.
- 

## **7. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION**

- 7.1 If agreed the draft Updated Response provided at Appendix 1 to this report will be presented to the Cabinet Member for Planning Policy and Management and if approved, be sent to KCC.
- 

## **8. REPORT APPENDICES**

The following document is to be published with this report and form part of the report:

- Appendix 1: Draft Updated Response to KCC regarding the Kent Mineral Sites Plan Regulation 18 Consultation
- 




## **9. BACKGROUND PAPERS**

- [National Planning Policy Framework](#)
- [Maidstone Local Plan Review 2021-38](#)
- [Kent Mineral Sites Plan proposed review progress](#)
- [Draft Kent Mineral Sites Plan including details of the nominated hard rock site](#)
- [Initial \(RAG\) Assessment of the suitability of the nominated land](#)

Minerals and Waste Planning Policy  
1<sup>st</sup> Floor  
Invicta House  
Maidstone  
ME14 1XX

## Maidstone Borough Council

Maidstone House,  
King Street,  
Maidstone, Kent ME15 6JQ

 [maidstone.gov.uk](http://maidstone.gov.uk)  
 [maidstonebc](https://twitter.com/maidstonebc)  
 [maidstoneboroughcouncil](https://www.facebook.com/maidstoneboroughcouncil)

By email to: [mwlp@kent.gov.uk](mailto:mwlp@kent.gov.uk)

Date: TBC/07/2024

Dear Sir/ Madam,

### **Regarding the proposed review of the Kent Minerals Sites Plan**

In June 2023, Kent County Council (KCC) launched a Regulation 18 consultation on the amendments to the Kent Mineral Sites Plan – Nominated Hard Rock Site Allocation (in addition to the further changes to the KMWLP review).

In response to this consultation, Maidstone Borough Council (MBC) wrote to KCC on 09 August 2023, setting out preliminary views on the proposed changes to the Minerals and Waste and Sites Plans, and confirmed that these would be subject to formal ratification.

On 07 September 2023, MBC sent a formal letter to KCC confirming our position at the time. This letter recognised that extending this site will meet a local need for minerals and allow existing on-site infrastructure and processing areas to be used. It also raised concerns that the proposed allocation lies within an area designated as a Local Wildlife Site and categorised as an ancient woodland, meaning that the development will cause harm to biodiversity. It emphasised its expectation that KCC will provide significant reassurances that there are exceptional circumstances to accord with the NPPF, and should this be demonstrated then maximum mitigation and restoration of the site to prevent the site coming forward for residential development will be expected.

The new MBC administration now wish to set out their position on this matter, therefore we provide to KCC an updated response to the above, given that the Minerals Sites Plan review is still within Regulation 18 stage. This will ensure that KCC understands MBC's latest stance before progressing to the next stage of the proposed Kent Mineral Sites Plan review.

## MBC's Updated Response to the proposed Kent Mineral Sites Plan review

This response is regarding the nominated extension site at the existing Hermitage Quarry.

While MBC recognises the importance and sustainability of meeting local need for minerals, we have concerns over the potential implications of the nominated extension site at the Hermitage Quarry on the wider environment.

### **Partial loss of and disturbances on Oaken Wood ancient woodland**

The original Hermitage Quarry has already seen a number of extensions over the last two decades; the last one in 2013 resulted in 14% loss of Oaken Wood ancient woodland. The nominated site represents further loss to parts of this woodland.

Despite being replanted with non-native trees, Oaken Wood retains its ancient woodland characteristics including undisturbed soils, unique flora, fungi, and mycelium networks which support ecological processes and carbon storage.

As per the NPPF definitions, ancient woodlands are irreplaceable habitats that require at least 400 years to establish. Any development on this nominated extension site will need to demonstrate 'wholly exceptional reasons' as per the NPPF, 186(c):

*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;*

This partial loss of Oaken Wood may cause significant ecological disturbances, leading to habitat fragmentation. This fragmentation may disrupt wildlife corridors, reduce biodiversity, and affect species that rely on large, continuous habitats. What remains of the interconnected network of ancient woodlands in this area (which is important for maintaining ecological balance) could become increasingly vulnerable, endangering the resilience of the ecosystems to environmental changes and human impacts.

### **Partial loss of and potential impacts on the Oaken Wood Local Wildlife Site**

A large part of the nominated extension lies within the Oaken Wood Local Wildlife Site (LWS) designation. LWSs are important for the conservation of wildlife at local and county wide level; their importance is recognised in the National Planning Policy Framework and Maidstone Local Plan Review 2021-38.

In principle, the allocation and development of the nominated site is in conflict with policy LPRSP14(A) Natural Environment of the Local Plan Review 2021-38 which reads:

*Development proposals will enhance, extend and connect habitats to enhance the borough's network of sites that incorporates designated sites of importance for biodiversity, priority habitats, Local Wildlife Sites and fragmented Ancient Woodland; [...]*

### **The risk of deteriorating the Oaken Wood SSSI**

The nominated extension is within close proximity to Oaken Wood Site of Special Scientific Interest (SSSI) which was designated because it is a key geomorphological site. Only a fifth of SSSIs in Kent (21 out of 98) were designated for geological interest, highlighting the importance to preserve the condition of Oaken Wood SSSI.

The reasons for its SSSI designation in 1985 read:

*“Oaken Wood is a key geomorphological site. It provides the best example in Britain of ridge and trough topography produced by intense cambering and gulling during the Pleistocene (tilting and cracking of surface rock outcrops by periglacial processes or deformation of underlying weaker strata). The ridge crests rise up to 8 m above the level of the trough floors, which extend for about 0.5 km in an eastwest direction. This unusual type of topography is confined to the Maidstone area and the north Cotswolds and is most spectacularly developed at Oaken Wood.”*

MBC is concerned that hard rock extraction near this geomorphological site may lead to its deterioration, due to the activities associated with hard rock extraction. Risks and all appropriate measures must be robustly assessed as part of ongoing detailed technical assessment, noting that SSSIs are afforded the strongest legal protection from loss and deterioration.

### **Alternative options to meet hard rock needs**

MBC notes that no other site for the extraction of hard rock has been identified or come forward in the Call for Sites undertaken in 2022; results from the second Call for Sites are not yet available. Technical assessment is still ongoing.

MBC also notes that an alternative could be not allocating the site and instead relying on imports of hard rock from outside of the county.

MBC urges that KCC robustly assess all evidence, potential risks and options.

I hope these further comments are helpful, and Maidstone Borough Council look forward to continuing, constructive dialogue on the above issues as part of the duty to cooperate.

Yours sincerely,



**Councillor Tony Harwood**

Cabinet Member for Planning Policy and Management

Maidstone Borough Council, King Street, Maidstone, Kent ME15 6JQ

# Agenda Item 14

## Planning and Healthier Stronger Communities Policy Advisory Committee

**09 July 2024**

### **Kent Minerals and Waste Local Plan – Draft Statement of Common Ground with Kent County Council**

<b>Timetable</b>	
<b>Meeting</b>	<b>Date</b>
Planning and Healthier Stronger Communities Committee	09/07/2020

<b>Will this be a Key Decision?</b>	No
<b>Urgency</b>	Not Applicable
<b>Final Decision-Maker</b>	Cabinet member for Planning Policy and Management
<b>Lead Head of Service</b>	Karen Britton (Head of Spatial Planning and Economic Development)
<b>Lead Officer and Report Author</b>	Thom Hoang (Principal Planning Officer)
<b>Classification</b>	<p>Public report with an exempt appendix The appendix contains exempt information as classified in paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972 in that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information). The public interest in maintaining this exemption outweighs the public interest in their disclosure. The Statement of Common Ground is a draft document and is currently unsigned and contains sensitive cross boundary matters. The draft document contains information affecting the business affairs of other authorities and bodies.</p> <p>Once the Statement of Common Ground has been agreed and signed by all relevant parties,</p>

	it will be published by KCC as evidence to support the Kent Minerals and Waste Local Plan examination.
<b>Wards affected</b>	All

### **Executive Summary**

The Kent Minerals and Waste Local Plan (KMWLP) forms part of the Development Plan for Maidstone and sets out planning policies relating to minerals supply and waste management. In 2019, a Statement of Common Ground (SoCG) was signed between MBC and KCC, setting out the agreements between both parties regarding the KMWLP and site allocation. In light of the following events, it is appropriate to review the previously signed SoCG:

- The KMWLP review was submitted for an independent examination in May 2024
- The Maidstone Local Plan Review 2021-38 adoption in March 2024
- KCC's proposed review of the Kent Mineral Sites Plan (separate report)

The draft revised SoCG (attached at Exempt Appendix 1) updates both parties' position, setting out areas of agreement. Site allocation matters relating to the Kent Mineral Sites Plan are decoupled from this proposed revision, given unknown issues that might arise from the proposed review of the Kent Mineral Sites Plan.

This report recommends that members agree the revised SoCG, as drafted by officers and attached at Exempt Appendix 1.

### **Purpose of Report**

To inform members of the proposed revision to the SoCG with Kent County Council regarding their ongoing review of Kent Minerals and Waste Local Plan and to seek agreement to sign off the draft SoCG (appended to this report).

### **This report makes the following recommendation to the Committee:**

1. That Members note the progress of the proposed refresh of the Kent Minerals and Waste Local Plan.
2. That Members recommend agreement the draft revised SoCG, attached as Exempt Appendix 1 of this report, to the Cabinet Member for Planning Policy and Management.

# Kent Minerals and Waste Local Plan – Draft Statement of Common Ground with Kent County Council

## 1. CROSS-CUTTING ISSUES AND IMPLICATIONS

<b>Impact on Corporate Priorities</b>	<p>The four Strategic Plan objectives are:</p> <ul style="list-style-type: none"> <li>• Embracing Growth and Enabling Infrastructure</li> <li>• Safe, Clean and Green</li> <li>• Homes and Communities</li> <li>• A Thriving Place</li> </ul> <p>Accepting the recommendation will enable the Council to ensure that plans at county council level do not materially harm its ability to achieve each of the corporate priorities.</p>	<p>Head of Spatial Planning &amp; Economic Development</p>
<b>Cross Cutting Objectives</b>	<p>The four cross-cutting objectives are:</p> <ul style="list-style-type: none"> <li>• Heritage is Respected</li> <li>• Health Inequalities are Addressed and Reduced</li> <li>• Deprivation and Social Mobility is Improved</li> <li>• Biodiversity and Environmental Sustainability is respected</li> </ul> <p>The recommendation supports the achievement of the objectives, in particular Biodiversity and Environmental Sustainability is respected.</p>	<p>Head of Spatial Planning &amp; Economic Development</p>
<b>Risk Management</b>	<p>The recommendation seeks to ensure that plans produced by the county council are not in conflict with our own plans and government policy.</p>	<p>Head of Spatial Planning &amp; Economic Development</p>
<b>Financial</b>	<p>The recommendation seeks to reduce the risk associated with the production of the Local Plan Review by ensuring that plans at county level are not in conflict with our own.</p>	<p>Section 151 Officer &amp; Finance Team</p>
<b>Staffing</b>	<p>This recommendation has been prepared with our current staffing.</p>	<p>Head of Spatial Planning &amp; Economic Development</p>

<b>Legal</b>	<p>As part of its duty to co-operate, Maidstone Borough Council (MBC) must engage constructively, actively and on an ongoing basis with Kent County Council (KCC) in the preparation of development plan documents in order to maximise the effectiveness of the activity of plan preparation.</p> <p>KCC has been consulting MBC on an update to the Kent Minerals and Waste Local Plan 2013-30, which also forms part of MBC's Local Development Plan. MBC has provided responses to previous consultations.</p> <p>Whilst there are no legal implications arising from the response, accepting the recommendation will help fulfil the Council's duties under s.33A of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations (2012) as amended.</p>	Russell Fitzpatrick - MKLS (Planning)
<b>Information Governance</b>	Accepting the recommendation will not increase the volume of data held by the Council.	Head of Insight Communities and Governance
<b>Equalities</b>	The recommendation do not propose a change in service therefore will not require an equalities impact assessment.	Head of Insight Communities and Governance
<b>Public Health</b>	No implications identified.	Head of Insight Communities and Governance
<b>Crime and Disorder</b>	The recommendation will not have a negative impact on Crime and Disorder.	Head of Spatial Planning & Economic Development
<b>Procurement</b>	N/A	Head of Spatial Planning & Economic Development

<b>Biodiversity and Climate Change</b>	The implications of this report on biodiversity and climate change have been considered. This report and the key changes proposed align with the broad aims of the Biodiversity and Climate Change Action Plan and promotion of waste reduction and circular economy.	Biodiversity and Climate Change Manager
--	---	---

## 2. INTRODUCTION AND BACKGROUND

- 2.1 The Kent Minerals and Waste Local Plan (KMWLP) 2013-30 was adopted in July 2016, with subsequent changes arising from an early partial review being adopted in 2020 for which KCC engaged with MBC through its statutory consultation process.
- 2.2 The Kent Minerals and Waste Local Plan forms part of the Development Plan for Maidstone and sets out planning policies relating to minerals supply and waste management. All applications on minerals and waste related development are assessed by KCC against the adopted plan, and other types development affecting minerals and waste sites are assessed by MBC, having regard to the Kent Minerals and Waste Local Plan.
- 2.3 The main changes arising from this proposed review centre around the following updates:
- Updates to the NPPF in 2018, 2019 and 2021 and associated Planning Practice Guidance;
  - Updates to legislation and policy concerning the need to adapt to, and mitigate, climate change and associated low carbon growth;
  - The inclusion of a new policy relating to the management of low-level radioactive waste; and,
  - Updates to reflect policy and legislation concerned with achieving a circular economy where more waste is prevented or reused.
- 2.4 The full proposed amends can be found here - <https://letstalk.kent.gov.uk/hub-page/mineralsandwaste>. So far as MBC are concerned, there are no material changes proposed to the mineral allocations and safeguarding policies.
- 2.5 Waste management is one of MBC's priorities for residential development developer contributions in the Local Plan Review 2021-38.
- 2.6 The Minerals and Waste Local Plan does not include allocations, but does carry forward existing allocations. These allocations are a strong material consideration in the determination of planning applications.

### Progress to date

- 3.1 As part of the ongoing review, KCC has so far undertaken the following consultations to date:
- Reg 18 consultation in Dec 2021;

- Reg 18 consultation in Oct 2022;
- Reg 18 consultation in June 2023, but only on the additional changes to the proposed review of the KMWLP (as part of this consultation, KCC also consulted on the amendments to the Kent Mineral Sites Plan);
- Reg 19 consultation in January 2024.

3.2 MBC has responded to the above consultations (see a summary in Section 7). It is considered that the wordings in the Pre-Submission KMWLP have taken into account MBC's previous representations, and that they are not in conflict with Maidstone's policies and interests.

3.3 In May 2024, KCC submitted the Minerals and Waste Local Plan to the Planning Inspectorate for an independent examination in public.

### **Previously signed Statement of Common Ground (SoCG)**

2.7 In 2019, a SoCG was signed between MBC and KCC, setting out the agreements between both parties on the following matter:

- Safeguarding of mineral resources;
- Safeguarding Minerals Management, Transportation & Waste Management Facilities; and
- Allocation of land for extraction of minerals.

2.8 The 2019 SoCG clearly set out the events prompting a review of the SoCG; according to this, Maidstone's Local Plan Review adoption in March 2024 triggered this clause.

### **The draft revised SoCG**

2.9 The draft revised SoCG (Exempt Appendix 1) by MBC and KCC's officers reflect factual changes.

2.10 It should be noted that this draft revised SoCG only covers the first two issues out of three mentioned in paragraph 2.7. This is because KCC is considering a further review of the adopted Mineral Sites Plan 2020 (MSP) which is a separate document and forms the basis of a separate report; therefore, matters relating to allocation of land for extraction of minerals will be dealt with separately at a later stage of KCC's Minerals Sites Plan review.

2.11 In summary, both parties continue to agree that:

- Safeguarding of minerals resources in the Borough of Maidstone will take place according to the safeguarding policies and the Safeguarding SPD (as updated in March 2021);
- Both parties will work together to ensure that the relevant safeguarding policy is implemented effectively.

---

## **4. AVAILABLE OPTIONS**

- 4.1 Option 1: That members recommend agreement of the draft revised SoCG at Exempt Appendix 1 of this report to the Cabinet Member for Planning Policy and Management. This would allow the SoCG to be finalised and signed, in accordance with the agreed protocol, so that it may be published as part of the KCC's evidence base for the examination of the KMWLP (which forms part of Maidstone's Development Plan).
  - 4.2 Option 2: That members do not recommend agreement of the draft revised SoCG to the Cabinet Member for Planning Policy and Management. This would mean that KCC would continue production and examination of its Development Plan Document and the previously signed Statement of Common Ground remains outdated.
  - 4.3 Option 3: That the draft SoCG be recommended for approved by the Cabinet, subject to further comments and changes, which would also need to be agreed by KCC. While this would allow the SoCG to be finalised and signed, in accordance with the agreed protocol, it may cause delays in submission of the SoCG by KCC.
- 

## **5. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

- 5.1 For the reasons set out above, it is recommended that Option 1 is followed and that members recommend agreement of the revised draft SoCG in the Exempt Appendix 1.
- 

## **6. RISK**

- 6.1 The risk associated with these proposals, as well as any risks should the Council not act as recommended, have been considered in line with the Council's Risk Management Framework. We are satisfied that the risks associated are within the Council's risk appetite and will be managed as per the Policy.

## **7. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK**

### **Reg 18 consultation in December 2021**

- 7.1 The consultation document may be viewed via the following link:  
<https://letstalk.kent.gov.uk/kmwlp/preview>

#### **Summary of issues of relevance to Maidstone**

- 7.2 Policy CSW 3 (Waste Reduction), sought to include the need for consideration of the circular waste economy in determining applications. CSW3 and its supporting text proposed a stronger requirement for waste created during development to be considered in planning applications. Notably, this included: a new requirement for the retention of existing buildings over demolition and redevelopment; a new requirement for details of the re-use of waste materials in new development; and a new



requirement for details of waste storage and how construction waste will be handled to be submitted at planning application stage. These new requirements would potentially place additional burden on the assessment of planning applications, with the possibility for a need to amend the local list.

### **Summary of Maidstone's response to this consultation**

- 7.3 Whilst MBC was supportive of the Kent Minerals and Waste Local Plan 2013-30 (refresh) and the proposed changes to waste management during delivery and operation of development, it raised the need for clarification around the proposed new wording of the policy CSW3. This proposed wording required that for applications submitted to Maidstone Borough Council, additional information be supplied at application stage. This would likely mean that MBC is required to add to their Local List a requirement for a Circular Economy Statement to accompany major applications.

### **Reg 18 consultation in Oct 2022**

- 7.4 The consultation document may be viewed via the following link:  
<https://letstalk.kent.gov.uk/kent-minerals-and-waste-local-plan>

### **Summary of issues of relevance to Maidstone**

- 7.5 Soft sand extraction at Chapel Farm: this site forms part of an allocation in the Maidstone Local Plan Review.
- 7.6 Policy CSW 3 (Waste Reduction) means MBC will need to add to its Local List a requirement for a Circular Economy Statement to accompany major applications.

### **Summary of Maidstone's response to this consultation**

- 7.7 MBC welcome the updated position in respect to soft sand extraction at Chapel Farm.
- 7.8 Policy CSW3 requires further consideration as it represents resource implications. So will need to work with KCC to ensure resource implications are minimised.

### **Reg 18 consultation in June 2023**

- 7.9 The consultation document may be viewed via the following link:  
<https://letstalk.kent.gov.uk/kent-minerals-and-waste-local-plan-2024-2039>

- 7.10 As mentioned above, only the additional changes to the proposed review of the KMWLP and the amendments to the Kent Mineral Sites Plan were consulted.

### **Summary of issues of relevance to Maidstone**

- 7.11 The Plan period is extended to 2039 (2024 – 2039).

- 7.12 In terms of soft sand: Due to the extended plan period, the total soft sand need is increased; however, the annual need remains the same. Regarding Chapel Farm, new text has been inserted setting out need and supply but the allocation has not changed, nor has the rate of extraction.
- 7.13 In terms of hard rock: total need is increased due to extended plan period so further reserves will need to be allocated.
- 7.14 In terms of the Mineral Sites Plan: the position in relation to Chapel Farm soft sand allocation in Lenham is updated. The nominated hard rock site at the Hermitage Quarry lies within the Oaken Wood Local Wildlife Site and Ancient Woodland, and is within close proximity to a Site of Special Scientific Interest. Please note that the Kent Mineral Sites Plan is a separate document and is not the subject of this SoCG.

### **Summary of Maidstone's response to this consultation**

- 7.15 Maidstone Borough Council has provided responses to this consultation, including a draft response sent on 09 August 2023, a formal letter on 07 September 2023; however these focussed only on the proposed Kent Mineral Sites Plan review rather than the KMWLP.

### **Reg 19 consultation in January 2024**

- 7.16 The consultation document may be viewed via the following link:  
<https://letstalk.kent.gov.uk/pre-submission-draft-kmwlp>

### **Summary of Maidstone's response to this consultation**

- 7.17 MBC do not have additional comments to make beyond those that have been provided to the previous Regulation 18 consultations on the KMWLP.

---

## **8. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION**

- 8.1 If agreed, the draft revised SoCG provided at Exempt Appendix 1 to this report will be presented to the Cabinet Member for Planning Policy and Management for decision.

---

## **9. REPORT APPENDICES**

The following document is to be published with this report and form part of the report:

- Exempt Appendix 1: Draft Revised SoCG with KCC regarding the Kent Minerals and Waste Local Plan

## **10. BACKGROUND PAPERS**

- Signed SoCG between MBC and KCC regarding the Kent Minerals and Waste Local Plan in May 2019
- [Minerals and waste planning policy](#)
- [Maidstone Local Plan Review 2021-38](#)

# Agenda Item 15

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted