

# Strategic Planning, Sustainability and Transport Committee

9<sup>th</sup> February 2016

Is the final decision on the recommendations in this report to be made at this meeting?

Yes

## Headcorn Neighbourhood Plan

<b>Final Decision-Maker</b>	SPS&T Committee
<b>Lead Director or Head of Service</b>	Rob Jarman, Head of Planning and Development
<b>Lead Officer and Report Author</b>	Chris Berry, Interim Team Leader, Spatial Policy
<b>Classification</b>	Non-exempt
<b>Wards affected</b>	Headcorn

### **This report makes the following recommendations to the final decision-maker:**

1. That the Committee approves this report as the basis for formal representations on the Headcorn Neighbourhood Plan (July 2015), attached as **Appendix A**, according to Regulation 16 of the Neighbourhood Plan Regulations 2012; and
2. That the Committee agrees the Council's consultation responses to the Headcorn Neighbourhood Plan (July 2015) which are described in more detail in paragraphs 2.11 to 2.48 of this report, with regard to both the adopted Maidstone Borough Wide Local Plan 2000 and the emerging Maidstone Borough Local Plan.
3. The Headcorn Neighbourhood Development Plan (July 2015) has been assessed, at this stage, to not require Strategic Environmental Assessment or Habitats Regulations Assessment;
4. That the Committee notes that the majority of Headcorn Neighbourhood Plan policies are in general conformity with adopted Maidstone Borough Wide Local Plan policies, except for those identified as follows, as discussed in paragraphs 2.16 to 2.38 below:
  - Policy HNP6 is not in conformity with Local Plan Policies ENV28 and ENV34; with regard to potential development in the countryside on the edge of Headcorn, and not giving priority to landscape issues in the Special Landscape Area
  - Policy HNP31 is not in conformity with Local Plan Policy ENV45; with regard to not prioritising business proposals ahead of residential conversions
  - Policy HNP15 is not in conformity with Local Plan Policy RT2; with regard to being limited to residential uses only
  - Policy HNP9 is not in conformity with Affordable Housing DPD Policy AH1;

with regard to not seeking at least 40% affordable housing and preferring shared equity housing.

5. That the Committee notes that the Headcorn Neighbourhood Plan is not in general conformity with the National Planning Policy Framework (NPPF) or the Local Plan Publication (Reg 19) in respect of not being positively prepared and making provision for objectively assessed need for housing and employment

**This report relates to the following corporate priorities:**

- Keeping Maidstone Borough an attractive place for all.
- Securing a successful economy for Maidstone Borough Council.

**Timetable**

<b><i>Meeting</i></b>	<b><i>Date</i></b>
Policy and Resources Committee	N/A
Council	N/A
Other Committee	N/A

# Headcorn Neighbourhood Plan

## 1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report constitutes the formal response of the Council to the Consultation on the Headcorn Neighbourhood Plan according to Regulation 16 of the Neighbourhood Planning Regulations 2012 ("the Regulations"). The Parish of Headcorn was agreed as a designated Neighbourhood Plan Area ("the Area") in April 2013 and a Neighbourhood Plan has been prepared.
- 1.2 An initial draft was prepared in accordance with Regulation 14 and this was consulted upon locally and comments made by council officers at various stages in the process. The draft was amended in the light of representations made and the Headcorn Neighbourhood Plan 2015 – 2031 ("the Neighbourhood Plan") was submitted to the council for public consultation as required by Regulation 16 in November 2015.
- 1.3 The Borough Council is responsible for the conduct of the public consultation which is required by Regulation 16, and can also make its own representations on the Neighbourhood Plan as part of the consultation process. Comments may be made with regard to the extent to which the Council believes the Neighbourhood Plan has satisfied the basic conditions (see para. 2.8 below) of the Neighbourhood Plan Regulations and these are then passed to the independent Examiner at the next stage of the process.
- 1.4 Representations made by the Council, with regard to the submission document, concerns its approach to the requirements of the National Planning Policy Framework ("the NPPF"), the relationship of Neighbourhood Plan policies with adopted Maidstone Borough Wide Local Plan 2000 policies, environmental legislation requirements and the emerging Local Plan.
- 1.5 If approved, the representations made in this report will be forwarded with the record of any subsequent discussion by Members of this committee, without further processing, for consideration by the Examiner. After consideration of these and all other representations from consultees, the Examiner will prepare a report and make a recommendation regarding a referendum.

## 2 INTRODUCTION AND BACKGROUND

- 2.1 Maidstone Borough Council has supported Headcorn Parish Council in preparing its neighbourhood plan by offering advice and guidance to ensure the plan meets the necessary regulations and legal criteria, as well as providing practical advice about how to achieve the overall aims and objectives of the Neighbourhood Plan. The Town and Country Planning Act 1990 (as updated by the Localism Act 2011) and the Regulations set out the formal stages which a Neighbourhood Development Plan must proceed through before it is made (adopted). Once made, the Neighbourhood Plan will form part of the Development Plan for Maidstone Borough.

- 2.2 Following the formal submission of the Neighbourhood Plan in accordance with to Regulation 15 of the Regulations, Maidstone Borough Council has statutory responsibility for a number of stages, both in terms of organisation and cost. These formal stages may be generalised as:
- consultation, (Regulation 16)
  - examination,
  - referendum and
  - formally making the Neighbourhood Development Plan.
- 2.3 The statutory (Regulation 16) consultation on the Neighbourhood Plan referred to in paragraph 1.1 above began on Friday 15<sup>th</sup> January 2016 and will be completed on Friday 26<sup>th</sup> February 2016. Preparation of the Neighbourhood Plan began in April 2013, when the Neighbourhood Plan Area was agreed, and has been developed by Headcorn Parish Council, with support from community volunteers, Maidstone Borough Council, and several consultant firms and individuals.
- 2.4 The final draft of the Neighbourhood Plan was submitted for consultation in November 2015. It aims to reflect community-wide views, concerns and wishes about the future of the Area and must be in general conformity with national policies set out in the NPPF and the policies in the adopted Maidstone Borough-Wide Local Plan 2000. The Neighbourhood Plan will progress to Examination following the Regulation 16 Consultation and when made, the plan period will run alongside the Maidstone Borough Local Plan to 2031.
- 2.5 The Neighbourhood Plan has nine main sections: Introducing Headcorn's Neighbourhood Plan; Setting the Scene – Headcorn past and present; Creating a Vision to meet Headcorn's needs; Overarching policies for development in Headcorn Parish; Policies for housing development in and around Headcorn's village envelope; Policies to support the local economy; Ensuring that Headcorn has the right infrastructure; Policies for new development in the countryside in Headcorn Parish; Summary of the policy framework, and several appendices.
- 2.6 After the consultation is closed, the Neighbourhood Plan, together with supporting documents and comments received during the consultation, will be submitted to the Examiner for independent examination. The Examiner's role is to test whether or not the Neighbourhood Plan meets the basic conditions set out in the Regulations and further matters set out in planning legislation.
- 2.7 The 'basic conditions' may be summarised as; whether the Neighbourhood Plan:
- a) has regard to national policy and guidance;
  - b) contributes to the achievement of sustainable development;
  - c) is in general conformity with the strategic policies of the development plan for the area or any part of that area; and

d) does not breach or is otherwise compatible with EU obligations, including the Strategic Environmental Assessment Directive 2001/42/EC and Habitats Directive 92/43/EEC.

2.8 The further requirements of the Examiner will include considering whether the Neighbourhood Plan complies with the definition contained within the Neighbourhood Planning Regulations; and whether the Neighbourhood Plan is compatible with the Human Rights Convention. The Examiner may also make recommendations on whether the area for referendum should extend beyond the Neighbourhood Plan boundaries.

2.9 The current consultation gives Maidstone Borough Council an opportunity to comment on whether it considers the Neighbourhood Plan meets the set of 'basic conditions'. The consultation response set out in this report will inform the Examiner of areas of particular concern to the Council and during the preparation of the Neighbourhood Plan; meetings were held between Council officers and the authors of the Neighbourhood Plan to discuss the basic conditions, and other related items.

2.10 The following points are the Council's proposed responses to the consultation and are summarised in the recommendations to this report at 1.1 above.

#### National Planning Policy Framework (NPPF)

2.11 The Neighbourhood Plan makes specific reference to the requirements of the NPPF in terms of planning positively and supporting policies for housing and economic development, but it takes as a key issue, "*over and above the factors that affect all Neighbourhood Plans,...whether the Neighbourhood Plan is for a rural location*"(page 14).

2.12 The Neighbourhood Plan quotes Paragraph 54 of the NPPF in support of its approach as follows:

*"In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate".(NPPF)*

2.13 However, the NPPF in para 9, with specific reference to neighbourhood planning, notes that the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. In relation to plan-making, the NPPF sets a core planning principle that planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.

2.14 A significant difference in approach between the NPPF and the Headcorn Neighbourhood Plan is that the Neighbourhood Plan does not allocate any housing sites but rather assesses their sustainability against a range of locally derived criteria, based on local survey results. There is thus no

certainty for developers, landowners, residents or infrastructure providers as to where new housing development will occur in the period to 2031 and this would appear to be at odds with the plan led system advocated by Government which requires development plans to take account of objectively assessed needs for housing and employment.

- 2.15 It may also be noted that the Neighbourhood Plan predicates its own classification as a "rural" location on the assertion throughout the document that it is an isolated settlement inappropriate for significant future development. The Neighbourhood Plan presents extensive statistical treatment seeking to justify this position, despite recognising Headcorn's status as a significant settlement.
- 2.16 Headcorn's designation in the Local Plan Publication (Reg 19) as a Rural Service Centre within the settlement hierarchy presents the alternative interpretation of its status and function. The population size, presence of a diverse range of services and community services, employment opportunities and a commuter railway station justifies Headcorn's designation as a rural service centre which is an appropriate location for planned development.

#### Conformity with Adopted Local Plan Policy

- 2.17 A basic condition for the Neighbourhood Plan is that it must be in general conformity with the 'saved' strategic policies of the adopted Maidstone Borough-Wide Local Plan 2000, that is, the high level strategic elements in the adopted Local Plan that are essential to delivering the overall planning and development strategy for the local area.
- 2.18 For the purposes of plan-making, saved local plan policies should not be considered out of date simply because they were adopted prior to the publication of the NPPF. However, from March 2013, due weight should be given to saved policies in existing plans according to their consistency with the NPPF, and the adopted policies have been assessed for their consistency with the NPPF and the emerging Local Plan.
- 2.19 Neighbourhood plans should thus only be expected to be in conformity with those strategic policies of the adopted Local Plan which are consistent with the NPPF. Policies in the Headcorn Neighbourhood Plan have been tested for their general conformity and the following comments may be made with regard to their consistency with Local Plan saved policies:

#### **Local Plan Policies ENV22 Urban Open Space; ENV23 Loss of Open Space and Recreation Facilities**

- 2.20 Policy HNP4 of the Headcorn Neighbourhood Plan (HNP) seeks to protect Local Green Space (defined on Figure 18); public green spaces within existing developments, unless it can be demonstrated that the development would be of material benefit to the surrounding residents, or the Parish as a whole; and recreational spaces unless certain criteria are met. Figure 18, as an aerial photo format, does not provide a clear definition of Local Green Space although 'wildlife corridors' are edged in yellow.

### **Local Plan Policy ENV27: New Footpath, Cycleway and Bridleway Proposals**

2.21 Policy HNP13: Density and site coverage. This policy seeks a density which allows for onsite footpaths and cycle-ways; and Policy HNP15: Connectivity and Access, which covers Small Village Developments and Larger Village Developments (as defined by Policy HNP6) and expects new development in Headcorn village to be permitted where it creates safe and well connected housing areas within the village, promoting and enhancing links both to Headcorn High Street and to the countryside that can be easily accessed by foot and cycle and these are generally in conformity with adopted Local plan policy.

### **Local Plan Policy ENV28: Development in the Countryside**

2.22 In place of housing allocations, Policy HNP6 allows developments of up to two, nine and 30 dwellings immediately to the edge of Headcorn. As such, development would not be within the development boundaries of Headcorn as proposed, and would therefore be within the countryside. This policy would not be in compliance with LP Policy ENV28 which generally restricts development in the countryside.

2.23 Policy HNP31 then appears to contradict the requirements of Policy HNP6 in that it would not generally permit building new dwellings in the countryside. The exceptions are where it is needed for a rural worker, because it is necessary for them to live close to their work; or it involves the reuse of a redundant, permanent building, or brownfield site; the development would represent the optimal value use of a heritage asset, or would help secure its future; or it is an exceptional new dwelling as defined by the NPPF.

2.24 Two further Headcorn Neighbourhood Plan policies also permit certain development in the countryside. Policy HNP34 allows agricultural dwellings if certain criteria are met but stipulates that planning permission for any dwelling associated with the site will be withdrawn unless certain financial considerations are met within five years. Policy HNP23 allows business activities (excluding retail, retail warehouses, tourism and leisure activities) in the countryside which involve the conversion of an existing permanent building, or can demonstrate that any existing structure on the site would be inappropriate for conversion and that there would be significant benefit associated with allowing a new building, and these are generally in conformity with adopted Local Plan policy.

### **Local Plan Policy ENV34: Special Landscape Areas**

2.25 The countryside surrounding Headcorn is located within the North Downs, Greensand Ridge, Low and High Weald Special Landscape Area (SLA) as defined on the Proposals Map and Policy HNP6 allows development of up to 30 dwellings on land immediately adjacent to the village. Whilst the NPPF and Planning Policy Guidance does not now promote the designation of local landscape areas except by the application of criteria based policies, the Headcorn Neighbourhood Plan is not technically in conformity with the adopted Local Plan in not giving priority to landscape issues in the SLA.

#### **Local Plan Policy ENV4: Ponds, Wetlands and Marshlands**

- 2.26 Policy HNP2: Headcorn's historic and natural environment, applies to all new development which should sensitively incorporate natural features such as trees, hedges and ponds within the site. HNP13 seeks densities and site coverage which allow the protection of important features such as ponds, hedgerows and trees which are in general conformity with the adopted Local Plan policy.

#### **Local Plan Policy ENV44: Conversion of Rural Buildings for Commercial, Industrial etc.**

- 2.27 Policy HNP23 allows business activities (excluding retail, retail warehouses, tourism and leisure activities) in the countryside which involves the conversion of an existing permanent building provided a number of criteria are met. Policy HNP19 would permit business activities in the countryside that facilitate tourism and leisure activities in Headcorn, such as hotels, B&Bs and holiday cottages, through conversion which is in general conformity with adopted Local Plan policy.

#### **Local Plan Policy ENV45: Conversion of Rural Buildings for Residential Purposes**

- 2.28 Policy HNP31 would permit a new dwelling in the countryside through the reuse of redundant permanent building. As drafted, this policy is not in general conformity with LP Policy ENV45 as it does not prioritise business proposals ahead of residential conversion.

#### **Local Plan Policy H27: Rural Settlements (Minor Development)**

- 2.29 The adopted Local Plan identifies Headcorn as appropriate only for minor infill development which includes limited infill development. Policy HNP6 allows developments in three categories; up to two dwellings, up to nine dwellings and up to 30 dwellings according to criteria. The Neighbourhood Plan is therefore not in general conformity with the adopted Local Plan in this respect, although it does take account of the plan period in the emerging Local Plan to 2031.

#### **Local Plan Policy T20: Headcorn Airfield**

- 2.30 Policy HNP20 would permit modest development at Headcorn Aerodrome for tourism and aviation related uses, providing any such development would not cause a significant increase in the noise associated with the operation of the airfield and is subject to the same strict regulations imposed on the current use of the airfield. This policy is in general conformity with adopted local plan policy.

**Local Plan Policies T21: Accessibility of New Development, and T23: Need for Highway/Public Transport Improvements**

- 2.31 Policy HNP15 covers accessibility issues for Small Village Developments and Larger Village Developments, as defined by Policy HNP6, and expects new development in Headcorn village to be permitted where it creates safe and well connected housing areas within the village, promoting and enhancing links both to Headcorn High Street and to the countryside that can be easily accessed by foot and cycle; avoids where possible choosing access routes that will exacerbate key pinch point and related issues. The policy does not apply to other uses so may be said not to be in general conformity with the adopted Local Plan policy.

**Local Plan Policies R1: Maintaining and Enhancing Existing Retail Facilities, R2: Major Retail Proposals Exceeding 500 sq m, R10: Local Centres, and R11: Local Convenience Shops, Post Offices and Pharmacies**

- 2.32 Policy HNP18 promotes the role of Headcorn High Street and resists the loss of any ground floor retail uses A1, A2, A3, or A5 to residential use in the Conservation Area and new development which would threaten the overall economic vitality and viability of the established retail and business centre of the village. As drafted, the retention policy applies to the Headcorn Conservation Area, which largely incorporates the Headcorn Local Centre. In this respect, the policy would be in general conformity with adopted Local Plan Policy R10 but recent changes to permitted development rights allowing a change of use from shop to residential makes this part of the policy unworkable.

**Local Plan Policy CF1: Seeking New Community Facilities**

- 2.33 Policy HNP11 would permit no further housing development in the form of either Small Village Developments or Larger Village Developments as defined in Policy HNP6, until preconditions for development have been achieved, including a legally binding agreement has been entered into providing for sufficient land behind the current school to secure the future of Headcorn Primary School in its current position. Policy HNP30 prioritises the use of development contributions for other community services and facilities which is in general conformity with adopted Local Plan policy.

**Adopted Open Space DPD: Policy OS1**

- 2.34 Policy HNP14 covers Small Village Developments and Larger Village Developments as defined by Policy HNP6. New development is expected to make appropriate use of landscape buffers between new and existing developments where they will help to create and enhance wildlife corridors. Larger Village Developments are also required to provide communal, open and recreational space within developments or provide a commuted sum to contribute to these facilities elsewhere which is in general conformity with adopted Local Plan policy.

## **Adopted Affordable Housing DPD: Policy AH1**

- 2.35 Policy HNP9 applies to Larger Village Developments of up to 30 dwellings and set the target for affordable housing as 20%. The split between social rented housing and shared equity housing should favour shared equity, with the first two out of every three affordable housing units being shared equity.
- 2.36 Developers would be expected to work with Headcorn Parish Council to try and ensure these homes are allocated to those with a local connection. The Neighbourhood Plan proposes that rather than providing 40% affordable housing (as set out in Local Plan Policy AH1), the target should be split between different types of housing to try and meet the needs of emerging households and the elderly.
- 2.37 In particular, the proposals are that, for Larger Village Developments:
- 20% of housing should be in the form of social housing, but with a split in favour of shared equity rather than social rented
  - 10% should be in the form of self-build plots for those with a connection to the Parish
  - Housing specifically designed to meet the needs of the elderly should be encouraged.
- 2.38 There is no evidence to indicate that self-build housing would meet the needs of those requiring affordable housing or that all housing specifically designed to meet the needs of the elderly would be affordable. As drafted, Policy HNP9 is not in general conformity with adopted policy as it does not seek at least 40% affordable housing, and it contains a preference for shared equity rather than rented accommodation.

### Non-conforming policies

- 2.39 In summary, the above analysis indicates that the majority of Headcorn Neighbourhood Plan policies are in general conformity with adopted Local Plan policies. Neighbourhood Plan policies which are not in general conformity with adopted Local Plan policy, as discussed in paragraphs 2.16 to 2.37 above, are as follows:
- Policy HNP6; with regard to potential development in the countryside on the edge of Headcorn, and not giving priority to landscape issues in the Special landscape Area
  - Policy HNP31; with regard to not prioritising business proposals ahead of residential conversions
  - Policy HNP15; with regard to being limited to residential uses only
  - Policy HNP9; with regard to not seeking at least 40% affordable housing and preferring shared equity.

### Strategic Environmental Assessment and Habitats Regulations Assessment

- 2.40 Maidstone Borough Council has carried out its duty to screen the Neighbourhood Plan for the need for a Strategic Environmental Assessment (SEA) or Habitats Regulation Assessment (HRA) and has received responses from statutory consultees as required by the legislation. At this stage,

Maidstone Borough Council is satisfied that there are no requirements for a SEA or HRA.

#### Conformity with emerging Local Plan Policy

- 2.41 Whilst it is not a requirement for a Neighbourhood Development Plan to be in conformity with an emerging plan, it is nonetheless clear that, given the stage at which the emerging Local Plan is currently at, the emerging strategic policies and priorities, and importantly the substantial evidence which underpin them, are relevant. The reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.
- 2.42 Accordingly, the Headcorn Neighbourhood Plan has been assessed for its general consistency with the emerging Local Plan. As previously noted, there are differences in approach to, in particular, the amount and phasing of development between the emerging Local Plan, and a number of these issues may be highlighted.
- 2.43 The emerging Local Plan identifies a hierarchy of settlements as locations for planned development and, after Maidstone, the emerging Local Plan seeks to focus new development in five Rural Service Centres, including Headcorn. To the extent that the Neighbourhood Plan recognises the present and future function of the village as a Rural Service Centre and location for development, it is in general accord with the approach of the emerging Local Plan.
- 2.44 However, the Neighbourhood Plan seeks to limit considerably the scale and phasing of new development and includes no housing allocations. Under Policy HNP7, a maximum of 90 dwellings will be permitted within two types of settlement (Small Village Developments and Larger Village Developments) and policies seek to reinforce the Rural Service Centre through the retention of services, addition of new infrastructure and extensive policy on the quality of development.
- 2.45 Six sites that have been allocated within the emerging Local Plan are not reflected in the Neighbourhood Plan; nor is the Gypsy and Traveller site (Policy GT1) in the period to 2022, and the 90 units permitted under Policy HNP7 compares with 425 units in the emerging Local Plan for the same period, although Barradale Farm is promoted as a key employment site (Policy HNP21).
- 2.46 In summary, with regard to the emerging Local Plan, there are clear discrepancies between the housing allocations in the emerging Local Plan and the lack of allocations in the Neighbourhood Plan. Overall, there is a restrictive approach to residential development in the Neighbourhood Plan, including an embargo on sites with a capacity of greater than two dwellings until 2022, and only then if sewage and education requirements have been met, as well as site capacity limits, density limits and strict phasing.
- 2.47 This may not sufficiently take into account the evidence base available in the SHMA and SHEDLA which support the emerging Local Plan and also appears not to take the NPPF sufficiently into account which indicates that

the presumption in favour of sustainable development has implications for how communities engage in neighbourhood planning. This means that Neighbourhood Plans should support the strategic development needs set out in Local Plans, including policies for housing (NPPF para 16).

2.48 As mentioned above in paragraph 2.13, in relation to plan-making, the NPPF sets a core planning principle that planning should be genuinely planned, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. The Neighbourhood Plan does not allocate housing sites, and although assessing their sustainability, there is no certainty for development providers as to where new housing development should take place in the period to 2031, and this would appear to challenge the plan led system advocated by the Government.

### 3. AVAILABLE OPTIONS

- 3.1 Once the Neighbourhood Plan is made it becomes part of the Council’s Development Plan and is used for development management decision making. If the Council does not respond to the consultation draft, it will have missed an opportunity to submit formal comments to the examination. There are therefore three options to consider:
- 3.2 Option A: To approve this report as the basis for the Council’s representations on the Headcorn Neighbourhood Plan.
- 3.3 Option B: Councillors could recommend additional or amended comments on the Headcorn Neighbourhood Plan.
- 3.4 Option C: Councillors may not agree the above representations.

### 4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 4.1 Councillors are recommended to adopt Option A to ensure that the Council’s representations are made available to the Examiner.

### 5. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
<b>Impact on Corporate Priorities</b>	When the Neighbourhood Plan is made it will form part of the development plan for Maidstone. This will assist in the delivery of the Council’s objectives, notably ‘Keeping Maidstone Borough an attractive place for all’	
<b>Risk Management</b>	This consultation is being run to ensure that the plan maintains the requirements	

	of government legislation	
<b>Financial</b>	Initial financial implications in terms of staff resources will be mitigated by Neighbourhood Plan Grant.	
<b>Staffing</b>	Assistance is provided to the PC by existing Council staff.	
<b>Legal</b>	The Neighbourhood Plan has been completed in accordance with the statutory requirements relating to Neighbourhood Plans and their preparation.	Kate Jardine, Solicitor, Team Leader (Planning), Mid Kent Legal Services
<b>Equality Impact Needs Assessment</b>	The needs of all interested parties have been considered as part of the consultations. Alternate formats available on request.	
<b>Environmental/Sustainable Development</b>	The plan has been the subject of both Strategic Environmental Assessment and Habitats Regulation Assessment.	
<b>Community Safety</b>	N/A	
<b>Human Rights Act</b>	N/A	
<b>Procurement</b>	Following the current consultation, the plan will proceed to Examination. The Examiner will be appointed according to procurement requirements.	
<b>Asset Management</b>	N/A	

## 6 REPORT APPENDICES

The following documents are to be published with this report and form part of the report:

Appendix A: Headcorn Matters – Headcorn Parish Neighbourhood Plan 2011 – 2013

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### BACKGROUND PAPERS