

HEADCORN PARISH COUNCIL



The Clerk, Parish Office, Headcorn Village Hall, Church Lane Headcorn TN27 9NR

Phone 01622 892496 Email clerk@headcornpc.org.uk

Alison Broom
Chief Executive
Maidstone Borough Council
Maidstone Gateway
King Street
Maidstone
Kent ME15 6JQ

25th February 2016

Dear Alison,

Reference: 15/507424/OUT

I am writing on behalf of Headcorn Parish Council (HPC) regarding item 19 on the MBC Planning Committee meeting agenda for 25th February to request that this item is removed from tonight's meeting. This is because we have serious concerns regarding the accuracy of the committee report and because relevant information is missing from the planning portal web site.

The missing information makes it impossible for HPC (or anyone else) to properly scrutinise the proposal. In particular:

- We note from paragraph 8.1 of the Committee Report that an amended site plan was provided to MBC on 18th December 2015. Despite the fact that two months have elapsed since then, this plan is still not available on the planning portal web site.
- Similarly the full text of the email from the spatial policy team, referred to in paragraph 7.6 of the Committee Report, is also missing from the background information on the MBC portal.

HPC had a planning committee on Monday of this week. If this plan and email had been available, they would have been discussed at this meeting to inform our approach to representing Headcorn's residents.

The inaccuracies and omissions in the report itself confirm to us the case officer has not completed appropriate background checks when completing his report. In particular:

- We note in paragraph 1.1 that the committee report suggests this site was not put forward to MBC in the call for sites. This is incorrect - the site was considered as HO-65 and was rejected on sustainability grounds by MBC for inclusion in the Local Plan.
- The Committee Report suggests in paragraph 9.13 that this site accords with NPPF objectives and gives two reasons that are both incorrect.





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- o Firstly the report states that the NPPF advises that when planning for residential development through the Local Plan process the focus should be on edge of town developments. This is false neither the NPPF nor National Planning Policy Guidance give any such advice. Furthermore, even if it did, Headcorn is not a town it is officially classified by the UK's Office for National Statistics as a village and in a rural area. NPPF advice for housing development in rural areas, such as Headcorn, is given in Paragraphs 54 and 55 of the NPPF and is that it should reflect "local need".
- Secondly the report states that the site is "located directly adjacent to the edge of the urban area of Maidstone". This is patently wrong. Indeed Headcorn has an Ashford postal address. Again this demonstrates the lack of coherent thought that has gone into the preparation of this committee report, which is unacceptable, particularly for such a significant development.
- In paragraph 9.14 the Committee Report incorrectly characterises the Headcorn Neighbourhood Plan policy on phasing (HNP7). For good planning reasons, the actual policy is that no further housing developments (of more than 2 units) will be granted planning permission before 2022 and then that a maximum of 45 dwellings will be allowed in the two subsequent 5-year periods, not that 30 houses will be permitted every 5 years as stated in the report.
- The Committee Report states (correctly) in paragraph 11.8 that the designation category of Special Landscape Area is being dropped from the emerging Local Plan. However, it fails to mention that this is being replaced by a Landscape of Local Value designation under the emerging Local Plan (as set out in Policy SP17) and that Headcorn is part of the Low Weald Landscape of Local Value.
- The Committee Report fails to mention the serious concerns raised about the sustainability of
 this development that were raised not only by local residents (in line with the analysis in
 Headcorn's Neighbourhood Plan), but also by MBC's Spatial Policy Team, who state in their
 assessment of the supposed benefits of the site that:

"None of the other factors identified and described by the applicant as 'benefits' can reasonably be considered to benefit the local area or its residents because:-

- they would not stem specifically from the development of this particular site as
 they could also be put forward to seek to try to justify the development for
 residential purposes of any other greenfield site in the borough that is outside,
 but adjacent to, a town or village;
- this is an outline application such that it will not be possible to specify the
 details associated with the development other than by requiring it to comply
 with any planning conditions that are attached to any planning permission;





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- they are intended to try to overcome the associated adverse impacts of what would otherwise be a development which is unacceptable in principle;
- there can be no guarantee that any job creation would benefit the local economy;
- there can be no guarantee that any additional expenditure from potential residents would benefit the local economy;
- any increase in New Homes Bonus to the council is not a planning consideration;
- the site's current biodiversity value reflects the fact that it is a farmer's field."
- We understand from a Headcorn parishioner that this application is subject to referral to the NPCU and this is not captured in the committee report.
- Finally in paragraph 7.6 the committee report does not reflect KCC's recent publicly stated
 position that it strongly opposes any more development along A274 corridor, especially
 development of a speculative nature, on transport grounds.

We trust you will act appropriately and remove this item from the agenda.

Yours sincerely

Caroline Carmichael Clerk

cc:

Helen Whately MP Barbara Cooper Cllr Jenny Whittle Rob Jarman Clive English Cllr Martin Round Cllr Richard Thick Debbie Snook

Dormichael

