

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**

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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 22nd June 2023 and 14th 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.

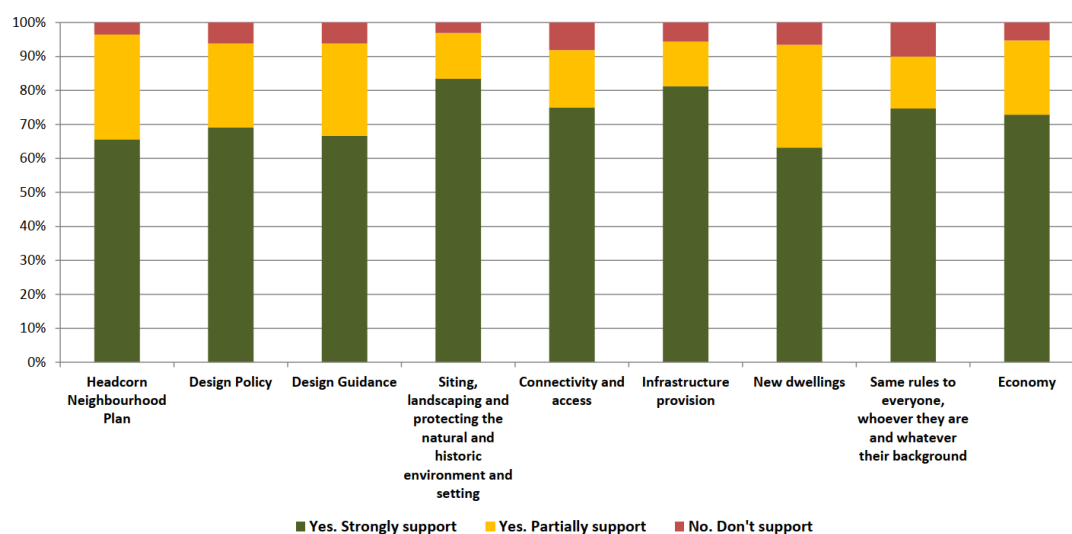
1.5 However, the 2023 Regulation 14 Consultation on Headcorn's Neighbourhood Plan is not the only consultation or evidence gathering that Headcorn Parish Council has undertaken to support the development of its Neighbourhood Plan. Therefore, for completeness: Section 3 provides some additional details 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 22nd and August 14th 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



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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.

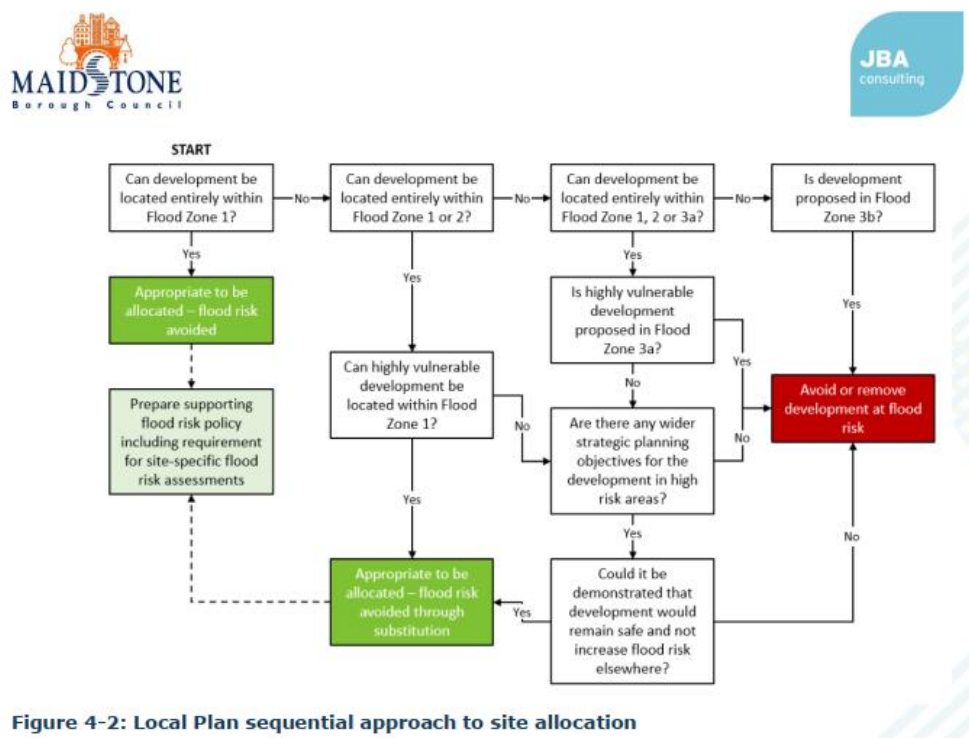


Figure 4-2: Local Plan sequential approach to site allocation

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 6th 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.¹ 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 standards² 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,

¹ 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.

² 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.³

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

³ 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 6th 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 14th 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:⁴

- 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).

⁴ 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 1st 2021 (with a response deadline of March 14th 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.⁵

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.⁶ 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.

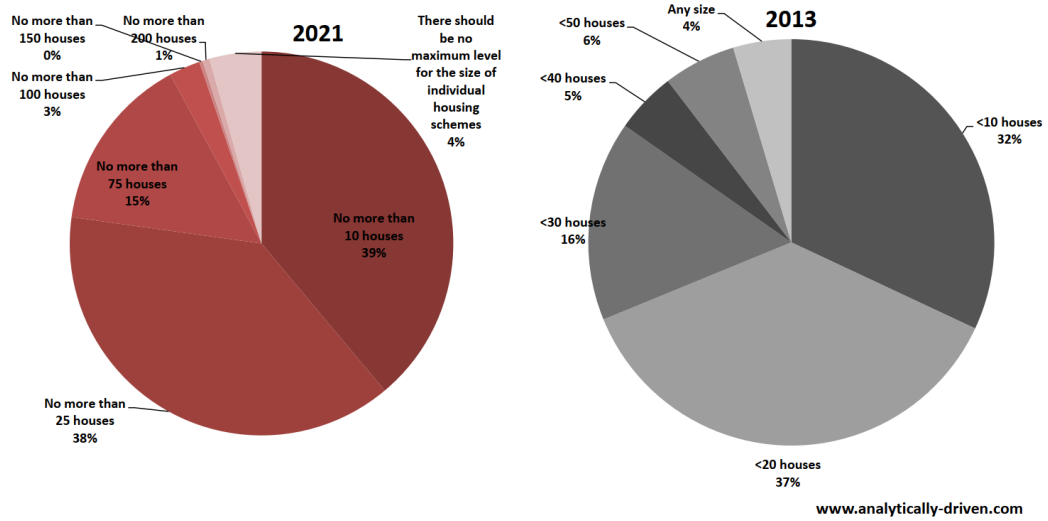
4.i Preferences for development in the 2021 Residents' Survey

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.

⁵ 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.

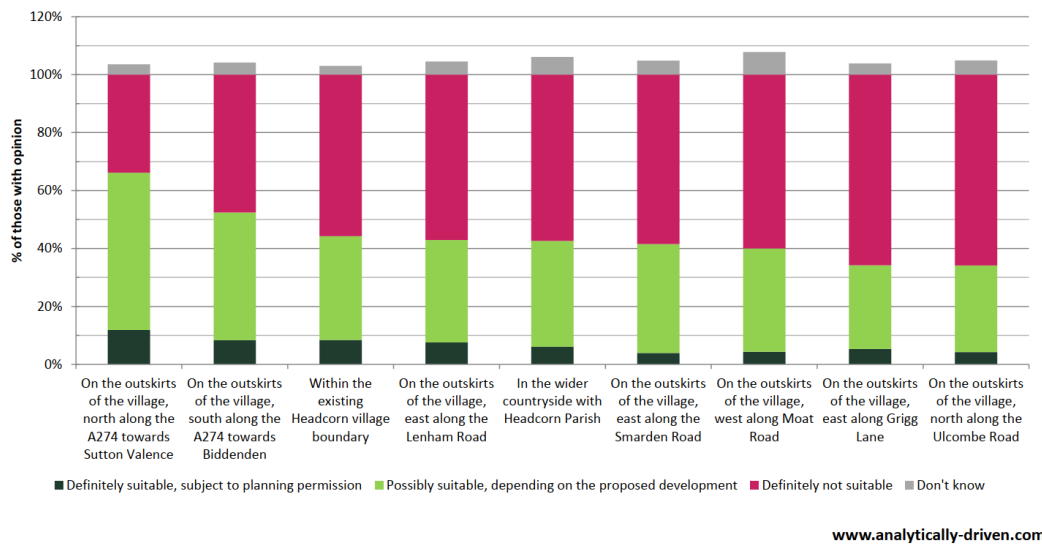
⁶ 82% of participants in the 2021 Headcorn Residents' Survey supported the draft Vision, with an additional 15% ticking maybe. In total only 3% of residents opposed the draft Vision for Headcorn.

Figure 3: Preferences for the size of developments in 2021 and 2013



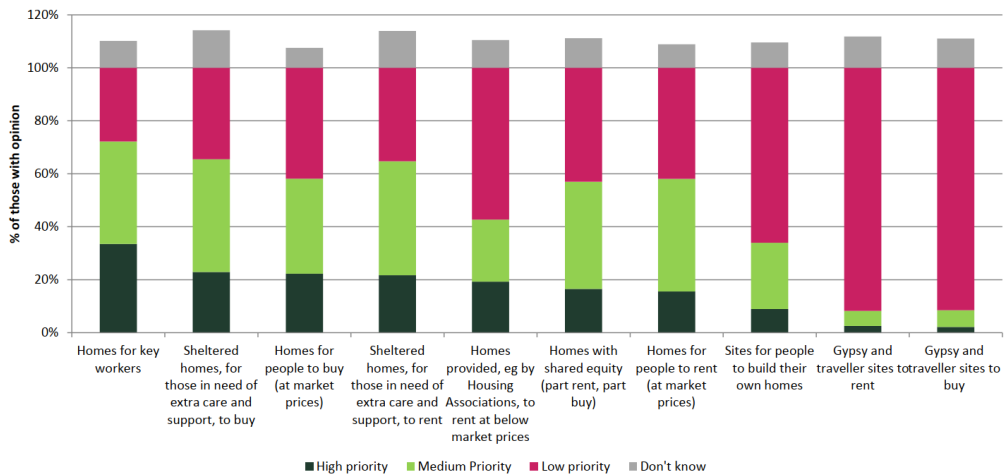
4.5 In terms of the location for development, only development along the A274 was seen as potentially suitable by over 50% of respondents expressing an opinion.

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



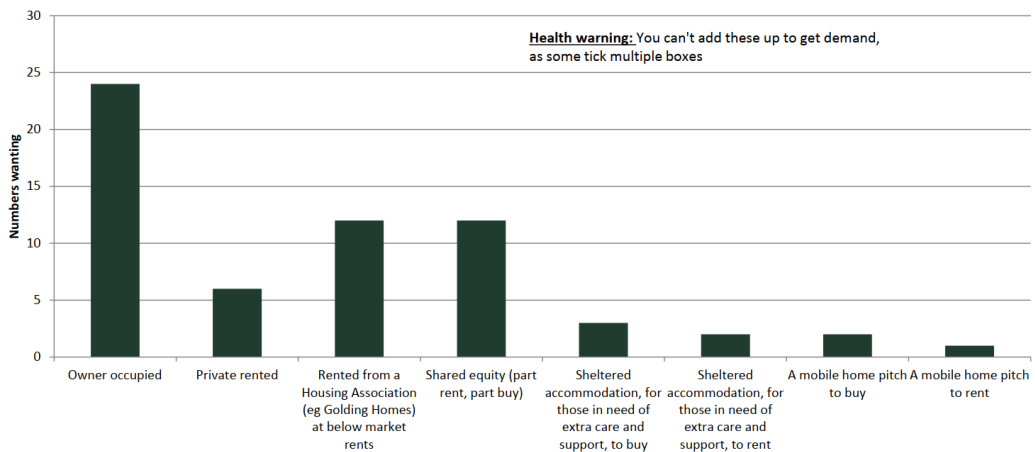
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A majority of respondents in the 2021 Residents’ Survey expressed a preference for the Parish Council to allocate sites through the Neighbourhood Plan. However, following discussions with Maidstone Borough Council about the progress of the Maidstone 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

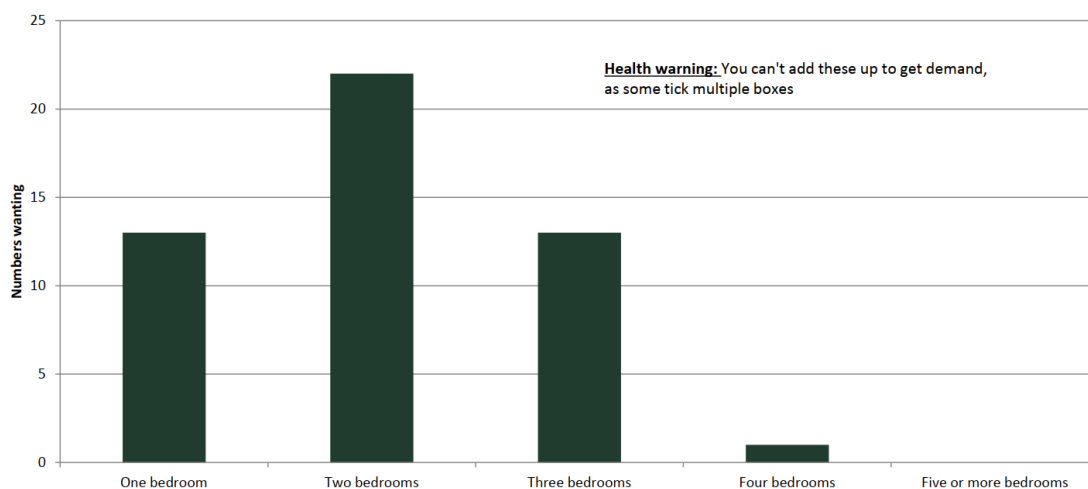
4.7 As shown in Appendix A3, the 2021 Residents’ Survey also asked about existing and emerging housing need. Amongst emerging households, the biggest barrier to entering the housing market in Headcorn was affordability, particularly for housing to buy. Over 35% of those in emerging households saw the 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



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Figure 7: Preferred size of property amongst emerging households in Headcorn, 2021 Residents' Survey



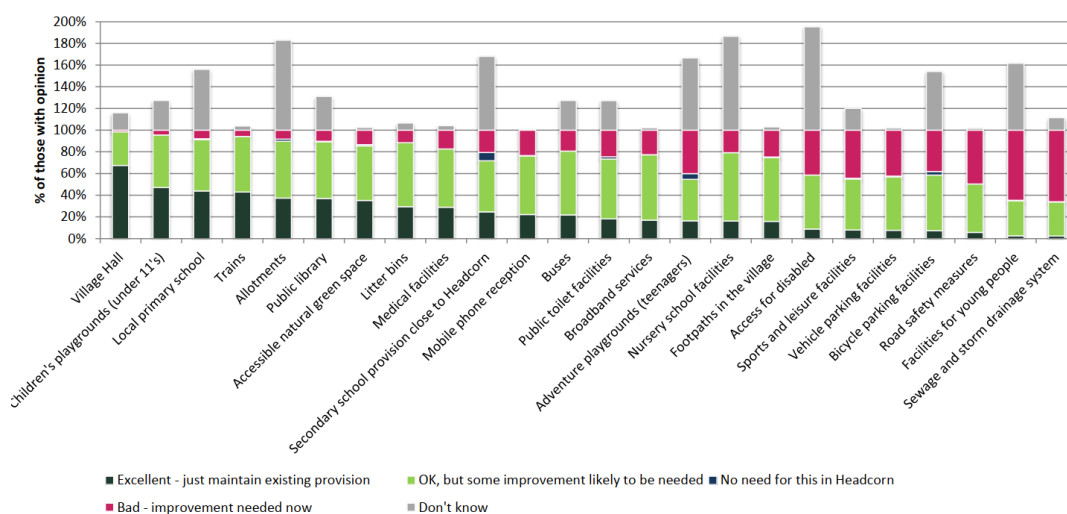
Health warning: You can't add these up to get demand, as some tick multiple boxes

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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.

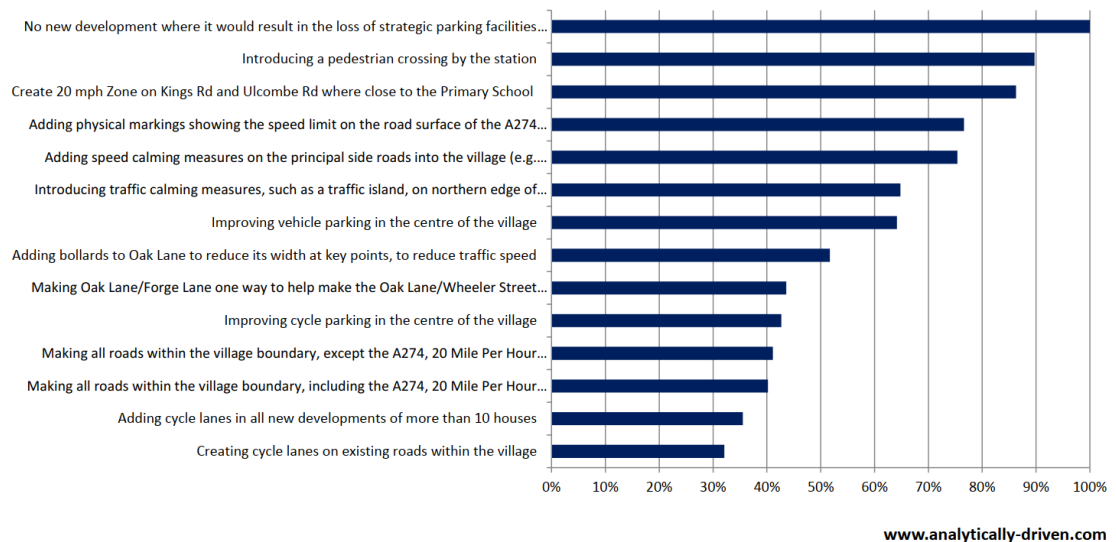
Figure 8: Infrastructure needs, 2021 Residents' Survey



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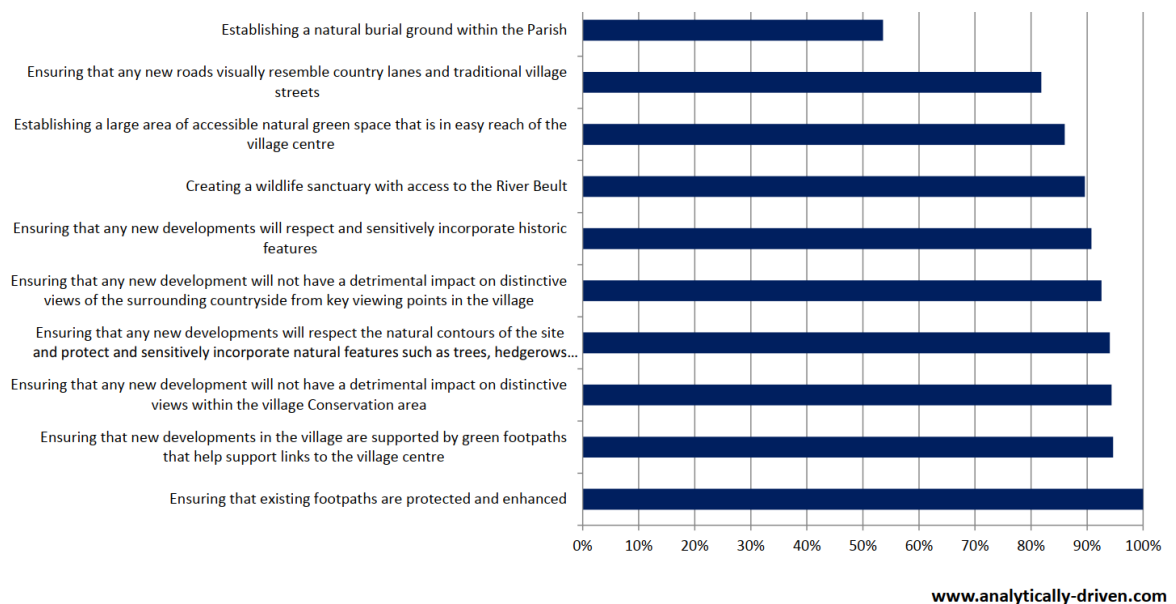
4.9 Of the options for traffic management explored in the 2021 Residents' Survey, the options with the most support were: no loss of strategic parking facilities; a pedestrian crossing by the station; a 20mph Zone on Kings Road and Ulcombe Road, close to the Primary School; and adding physical markings 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;⁷ 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

⁷ 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).⁸ 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 22nd and August 14th 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.⁹

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. Therefore to undertake its Regulation 14 Consultation, Headcorn Parish Council advertised by social media and an independent Parish Newsletter (run by a village volunteer). As well as advertising at the consultation launch, Headcorn Parish Council issued several reminders during the consultation process. 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; 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?

⁸ <https://www.legislation.gov.uk/ukSI/2012/637/contents/made>

⁹ 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).

- Who owns Headcorn's Neighbourhood Plan?
- What is the difference between Maidstone's Local Plan and Headcorn's Neighbourhood Plan?
- 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 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. A list of the organisations consulted is shown in section A1.ii.

A1.i Online 2023 Regulation 14 Questionnaire

6.5 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. The Survey also collected 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. However, 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.¹⁰ The Survey used is provided below.

¹⁰ 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)



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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

6.6 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 27th 2023 and follow up emails on 20th July and 3rd 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

Organisations and businesses consulted:		
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
Businesses in Headcorn:		
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

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 22nd June 2023 until 14th 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 or 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: 14th August 2023

By email only

Dear Sir/Madam

Maidstone Borough Council

Maidstone House,
King Street,
Maidstone, Kent ME15 6JQ

 maidstone.gov.uk
 [maidstonebc](https://twitter.com/maidstonebc)
 [maidstoneboroughcouncil](https://www.facebook.com/maidstoneboroughcouncil)

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 10th August. The Council will confirm the status of the screening report with Headcorn Parish Council after this date.



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 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 emboldened , and deleted text in strike 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"> • 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. • 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. • 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).
10	1.13	Wording should read Community Infrastructure Levey Levy .
	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"> • If the Neighbourhood Plan wishes to coincide with the LPR, timetable will need to change to include 2021 – 2038. • Would it be better to say submitted for Examination in March 2022 rather than Regulation 19.
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 emboldened , and deleted text in strike 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 an 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"> • Not in conformity with LP 2011-31 Policy DM4 criteria 1 as it does not allow for the enhancement of a heritage asset.
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 preserve 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: ' 6.41 <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"> • 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.

Page 2 of 5

**Headcorn Neighbourhood Plan
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Maidstone Borough Council Representation**

Page No.	Policy or Paragraph No.	Representation
		Note: Suggested text additions are emboldened , and deleted text in strike through
		<ul style="list-style-type: none"> 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. 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 & 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. Part 3 is not in conformity with wording in NPPF paragraph 99
84	HNP Policy 2	<ul style="list-style-type: none"> Criteria 2 perhaps for added clarity the views proposed in HNP Map 12 should be included in the policy itself.
84	HNP Policy 2	<ul style="list-style-type: none"> Part 6 will deliver a biodiversity net gain, in line with national and local targets, that is focused on supporting native flora and fauna
87	7.2	<ul style="list-style-type: none"> for example, for road safety; will reflect desired development patterns by, for example, avoiding the creationing of ribbon development or rat runs
93	8.6	<ul style="list-style-type: none"> The results from the 2021 Residents' Survey represent a slight improvement compared to to the results from the 2013 Residents' Survey
100	HNP Policy 4	<ul style="list-style-type: none"> 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. 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 prioritisation¹ <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>

¹ Paragraph: 005 Reference ID: 41-005-20190509

**Headcorn Neighbourhood Plan
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Maidstone Borough Council Representation**

Page No.	Policy or Paragraph No.	Representation
		Note: Suggested text additions are emboldened , and deleted text in strike through
		<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"> 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. 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. 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.
106	9.10	<ul style="list-style-type: none"> Setting a maximum size of self-build schemes is not in conformity with SP19 – the Council will not set specific targets due to inflexibility.
116	HNP Policy 5	<ul style="list-style-type: none"> Part IV of the policy is not in conformity with LP 2011-31 Policy SP17 criteria (1&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. Part I.2 of the policy is not in conformity with LP 2011-31 Policy SP19 criteria (2) Part II.5 of the policy is not in conformity with LP 2011-31 Policy SP20 criterion (3 [i] & [ii]). The proposed favour for affordable purchased housing is not in line with the

**Headcorn Neighbourhood Plan
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Page No.	Policy or Paragraph No.	Representation
		<p>Note: Suggested text additions are emboldened, and deleted text in strikethrough</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"> 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.
126	HNP Policy 6	<ul style="list-style-type: none"> 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. May want to define 'business development' in within the reasoned justification to the policy and use planning terminology, for example the use class order.

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 2nd 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
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

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

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.

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/>

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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

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>
Sent: Monday, July 31, 2023 1:54 PM
To: Clerk <clerk@headcornpc.org.uk>
Cc: LoosePC Clerks <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
Personal email: 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



Our Ref: MV/15B901605

09 August 2023

Headcorn Parish Council
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

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

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]

Director

[REDACTED]

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
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/

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

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

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Development Liaison Officer

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
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 1st 2021 using SurveyMonkey, with a deadline of March 14th 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]

- | | |
|--|---|
| <input type="checkbox"/> Can't afford to buy in Headcorn | <input type="checkbox"/> Can't find anywhere suitable to rent in Headcorn |
| <input type="checkbox"/> Can't afford to rent in Headcorn | <input type="checkbox"/> Needed by family |
| <input type="checkbox"/> Can't find anywhere suitable to buy in Headcorn | |
| <input type="checkbox"/> Other (please specify) | |

16. What size of property would be needed, if moving was an option?

[Tick all that apply]

- | | |
|---|--|
| <input type="checkbox"/> One bedroom | <input type="checkbox"/> Four bedrooms |
| <input type="checkbox"/> Two bedrooms | <input type="checkbox"/> Five or more bedrooms |
| <input type="checkbox"/> Three bedrooms | |

17. What type of home would be ideal?

[Tick all that apply]

- | | |
|---|--|
| <input type="checkbox"/> Owner occupied | <input type="checkbox"/> Sheltered accommodation, for those in need of extra care and support, to buy |
| <input type="checkbox"/> Private rented | <input type="checkbox"/> Sheltered accommodation, for those in need of extra care and support, to rent |
| <input type="checkbox"/> Rented from a Housing Association (eg Golding Homes) at below market rents | <input type="checkbox"/> A mobile home pitch to buy |
| <input type="checkbox"/> Shared equity (part rent, part buy) | <input type="checkbox"/> 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



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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.¹¹ 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.¹²

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

¹¹ 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>.

¹² 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.¹³ 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.

¹³ 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 14th 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.¹⁴ 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.¹⁵ 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 10th May 2023 that a formal Strategic Environmental Assessment would not be needed in the case of Headcorn's Neighbourhood Plan.¹⁶

¹⁴ 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.

¹⁵ The 2015 draft Neighbourhood Plan contained 34 Policies supporting the Vision for Headcorn.

¹⁶ This advice is based on the emerging policies in Headcorn's Neighbourhood Plan, and on their discussions with the statutory consultees.

APPENDIX 5: REFERENCES

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