

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
1	1	Design Policies for Headcorn	2	2	7	<p>Historic England specifically supports HNP1 and HNP18.</p> <p>Policy HNP1 sets out the design principles to be followed if the Plan is adopted. Gladman opines that although the policy attempts to ensure high quality design within Headcorn, the policy is restrictive in terms of the requirements for new developments and is therefore not in line with paragraphs 59 or 60 of the Framework.</p> <p>Policy HNP1 includes a rigid requirement at section H regarding future building heights. It is not clear how this is justified. There has obviously been much previous work carried out regarding the design character of the village. If this policy is to be taken forward it should be cross-referenced to that – especially regarding the justification for the proposed limit on building heights -- and the supporting character assessment work included in the evidence base.</p> <p>Historic England makes suggested amendments to the text of HNP1 in respect of the views most valued by residents in the Neighbourhood Plan survey being those of the church and surrounding area including Parsonage field and views along the High Street, the historic core of the village.</p> <p>HNP1 is setting a tone of limiting development [to developments 30 dwellings or less and an overall cap on numbers] is not compliant with the Basic Conditions tests for Neighbourhood Plan.</p> <p>MIDB commented that flooding risks should be given more emphasis. For example, the fact that certain roads might be impassable during a really bad flood should be included in the text of the NP.</p> <p>MIDB advises that JBA Consulting (on behalf of KCC) is carrying out a Surface Water Management Plan for Headcorn.</p> <p>Comment made that the text reads as if it has been taken from a detailed analysis of the village architecture. If there is a previous Village Design Guide or Conservation Area Appraisal then it should be included in the evidence base supporting the plan.</p> <p>Suggests the use of footpaths is discussed with the relevant highways authority, who did not comment on this matter. KHS seems to prefer to deal with proposals on a case by case basis.</p> <p>Verify that the parking standard fits in with the Local Plan.</p>	<p>Comments from Historic England that the uniform height in Headcorn, with no building exceeding 2.5 storeys, was significant and could be made clearer in the policy. Accordingly policy HNP 1 now stipulates very clearly a maximum height of 2.5 storeys and makes greater reference to the protected views.</p> <p>HPC does not agree with this view. Refer to the Statement of Basic Conditions that accompanies the NP.</p> <p>MIDB comments regarding the risk of road flooding and the SWMP work being led by the LLFA (KCC) have been incorporated in the Reg 16 version of the NP.</p> <p>Comments and suggestions on wording noted and text appropriately amended. Policy remains substantially unchanged.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
2	2	Protection of trees, hedgerows and ponds	3	0	8		
						Historic England notes that many of these features are in fact historically significant spaces or features and that it might be helpful to decision makers to raise the importance of their historical, as well as natural interest, e.g. the parish's network of trees, hedgerows and ponds, for example, stand out as features that reflect the history of human management of the landscape and that contribute to its historic rural and agricultural character and identity.	Historic England note that despite the title of this section, many of these features are in fact historically significant spaces or features and that it might be helpful to decision makers to raise the importance of their historical, as well as natural interest. Therefore the policy is renamed to from "Policies covering the natural environment" to "Protection of Headcorn's historic and natural environment", following recommendation from Historic England and updated to reflect comments on the historic environment and the importance of not just protecting, but enhancing the natural environment. Additional definitions of key habitats (which is relevant for this policy) also added in Section 2, following comments from the Environment Agency. The parish's network of trees, hedgerows and ponds, for example, stand out as features that reflect the history of human management of the landscape and contribute to its historic rural and agricultural character and identity. Historic England supports the Plan's identification of the parish's network of trees, hedgerows and ponds. We have HPC has incorporated Historic England's their comments and reworded the first paragraph to reflect their suggestion that new development in Headcorn Parish, in accordance with the Neighbourhood Plan, will be permitted where it respects the natural contours of the site and protects and sensitively incorporates historic and/or natural features such as trees, hedges and ponds within the site, to make best use of the site to accommodate development; to help preserve and enhance the natural environment in Headcorn, by providing a habitat for wildlife; and to sustain the historic environment, including the contribution of these features to local character and identity. General comments supported the need for decent sized open areas/parkland/woods for walking and leisure and . Aalso supported the need for habitat corridors/sanctuaries and nature reserves.
						DHA Planning states that Policy HNP 2 provides uncertainty, if not barriers, as regards the development of land bordered by ancient hedgerows, as it states '...existing ancient hedgerows must be preserved as part of any new development.' DHA Planning expresses the view that the ancient hedgerows referred to in Policy HNP 2 should be shown in figures and compatibility with the delivery of site allocations should be ensured or HNP 2 should be reworded to allow for removal of ancient hedgerow where required for site access for developments consistent with the NP.	Figure 18 shows the important green spaces and wildlife corridors within the village. These are seen as the most important hedgerows and corridors supporting this policy, which should be maintained and the Policy reflects this.
						Wealden Homes highlighted the fact that Great Crested Newts are a European Protected Species.	It was noted that the Great Crested Newt is a European protected species. The text has been revised.
						Wealden Homes states it would have expected to see in the NP which TPO woodland areas and key trees are protected within the Parish.	The core of the village is covered by the Conservation Area where trees are protected. Outside this there are numerous TPO's, which would be difficult to identify in detail on a map. In addition, there are small woodland TPO's on the old Kent & East Sussex railway line to the south of Headcorn railway station as well as at Shenley crossroads.
						There should be reference to the ecological mitigation measures required/being provided especially as the countryside adjacent to the village has ponds which create habitat for the Great Crested Newt.	This is reflected in the appropriate figure of the NP.
						More decent sized open areas/parkland woods needed for walking & leisure	The pleas for more footpaths into the countryside and suggestions for improving connectivity and safe [pedestrian] access within the village were put forward. These are covered under HNP13 and will be picked up as part of HM Project 5.
						Statement of explicit support for habitat corridors/ sanctuaries/ nature reserves.	
						If the Parish Council seeks to designate land as Local Green Space then this should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared.	Headcorn Parish Council notes that Headcorn does not have any publically accessible green space of more than 2 hectares, meaning all the sites in Headcorn should be judged as amber against this criterion (including all those in the original study).

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3	3	Dealing with the risk of Flooding	1	0	8	<p>Southern Water comments that it acknowledges there to be significant infrastructure constraints facing Headcorn, particularly with the sewerage network, which is adversely Southern Water furthermore highlights that it has undertaken various measures to address flooding concerns, including:</p> <ul style="list-style-type: none"> <li>• A programme of sewer jetting (cleaning with a jet of high-pressure water), carried out every six months to ensure the system is working as effectively as possible.</li> <li>• Installing non-return valves in properties (NRVs) to prevent wastewater coming back up the sewer and causing flooding, for example, due to a blockage in the sewer caused by wet wipes or a build up of fat, oil and grease.</li> <li>• The refurbishment of Moat Road Wastewater Pumping Station to improve its operational performance and ensure wastewater from local homes and businesses is being removed effectively.</li> </ul> <p>Southern Water affected by surface water inundation during times of heavy rain. Southern Water further highlights in its representation that it has been working with the Lead Local Flood Authority (Kent County Council) to progress a Surface Water Management Plan (SWMP) for the area, after which Southern Water will be undertaking a Drainage Area Plan (DAP) of the Headcorn catchment which is expected to complete in Spring 2016. The DAP will determine investment requirements which will be prioritised against other investment needs and decisions.</p>	<p>Southern Water (SW) made a number of constructive suggestions to the wording and confirmed that they agreed with the necessity to co-ordinate development with the provision of any necessary infrastructure and that they would seek planning policies and conditions to facilitate this. SW updated Headcorn Matters on reference to the Maidstone Borough Council Water Cycle Study (2010) informing that resulting from continuous monitoring SW had identified additional capacity at Headcorn WTW. Supporting text was added that Southern Water had confirmed it is operating within its environmental permit. Given the importance of the River Beult's status as an SSSI, added, in the policy wording now includes a requirement that (where applicable) it should be clear that the relevant permits can be adhered to before planning permission is granted. SW indicated a willingness to undertake assessments of the sewage network to determine on a site by site basis whether existing local capacity was sufficient to meet anticipated demand from a proposed development stating that more capacity can be provided by the provision of additional local infrastructure in parallel with new developments. Nearest points of adequate capacity should be established as part of the mechanism for site allocation policies and that planning conditions facilitate the delivery of any requisite local infrastructure. These suggestions have been worked into the revised text together with some re-wording of the Policy itself.</p> <p>On the issue of surface water surcharge from existing buildings SW recognises that the system is not designed to take such water that should be the responsibility of appropriate land drainage. SW confirm that they are working with the KCC as Lead Local Flood Authority to progress a Surface Water Management Plan that includes Headcorn identifying solutions so that the sewerage system can function as intended. SW proposed amendments have been incorporated as appropriate. Southern Water confirmed that their operations of the Headcorn Wastewater Treatment Works were in accordance with the environmental permit and reference to this has been amended in the supporting text in this policy. HPC remains concerned over the time needed to effect any identified improvements to the sewage system, assurance that the necessary budgets will be prioritised and authorised and the works committed in a timely manner and over the demonstrable failure of the planning consents protocols that allow further housing to be built without the infrastructure being upgraded. Accordingly, HPC is making no changes of intent to this aspect of the relevant policies in the Reg 14 NP.</p>
						<p>EA suggests that the NP includes a policy which encourages collaboration between developers to make provision for strategic sustainable drainage infrastructure that a number of several small developments can all discharge into.</p>	
						<p>EA suggests HPC considers the proposals [being] made by KCC and make reference to it within policy HNP3 of the Neighbourhood Plan. The Non-statutory technical standards for sustainable drainage systems were published by the Department for Environment, Food &amp; Rural Affairs (DEFRA) in March 2015. HNP3 should make reference to these standards and as sustainable drainage features may form part of the landscape of the development, a suitable contractor could be appointed to undertake maintenance for both drainage and landscape.</p>	<p>HPC believes these requirements are best handled in Conditions attached by LPA to Planning Consents as they will be development-specific</p>
						<p>EA suggests slight re-wording to HNP3 to make it technically correct.</p>	<p>Proposed amendments incorporated</p>
						<p>MIDB commented that flooding risks should be given more emphasis. For example, the fact that certain roads might be impassable during a really bad flood should be included in the text of the NP.</p>	
						<p>MIDB advises that JBA Consulting (on behalf of KCC) is carrying out a Surface Water Management Plan for Headcorn.</p>	<p>MIDB comments regarding the risk of road flooding and the SWMP work being led by the LLFA (KCC) have been incorporated in the Reg 16 version of the NP.</p>

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4	4	Protection of Communal Spaces in Headcorn	6	0	2	<p>HE suggests that it may be helpful for the sake of clarity to indicate whether the term 'Area of Important Open Space' in the plan is used to indicate Local Green Space as defined in the National Planning Policy Framework. The latter designation has a considerable implication for landuse by, in effect, preventing development during the term of the plan but will need to be clearly identified as such to have effect and to ensure the plan is robustly compiled, including providing land owners with an opportunity to comment on its suitability. A number of the green spaces identified are located within the Headcorn Conservation Area and, as such, may have a value for their historic interest that would support their designation as Local Green Space, whilst also being 'local in character'. It would be helpful to clearly indicate in the supporting text to this policy whether, for example, the churchyard and Parsonage Meadow are considered to have historic interest, including illustration of the historic ownership and land use in the village. In doing so it would be helpful to refer directly to their status as a positive feature in the Conservation Area.</p> <p>More decent sized open areas/parkland woods needed for walking &amp; leisure, particularly to the east of the village. Consider land south of the railway for additional recreational space.</p>	<p>Points made by Historic England suggesting the designation of key historic open spaces in the village as Local Green Spaces under the NPPF have been taken on board in the text and policy. Comments by Sport England suggesting taking a more pro-active stance in the Plan on future sports and leisure provision have been addressed and informed by other comments and feedback from residents. This has led to three new projects in the Plan:</p> <p>HM Project 1 - Upgrade the recreational facilities for teenagers and young adults (previously HNP27);</p> <p>HM Project 2 - Creation of a wildlife sanctuary with access to the River Beult and improving access to natural green space (previously HNP28); and</p> <p>HM Project 3 - Sporting and leisure facilities at Headcorn Primary School (to ensure that the expansion of the school enables community use of those facilities).</p> <p>Policy has been renamed from 'Protection of communal spaces in Headcorn' to "Protection of communal spaces and community assets in Headcorn" and additional supporting projects have been included in the Plan, as outlined above.</p> <p>Text has been included with respect to protection for community assets following advice from MBC.</p> <p>Following advice from Historic England, changed the designation "Area of Important Open Space" has been changed to "Local Green Space" to align with the NPPF, and expanded on their historic significance in the supporting text.</p> <p>Comments by Sport England suggesting taking a more pro-active stance in the Plan on future sports and leisure provision have been addressed and informed by other comments and feedback from residents, particularly on desire for recreational spaces suitable for dog walking.</p>

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6	6	Definition of allowable housing development types in Headcorn Village, including maximum size	9	23	9	<p>Limit developments to 30 houses maximum</p> <p>Delete in HNP6 reference to the maximum size of any development as 30 dwellings.</p> <p>A controlled growth in housing is needed, that will support Headcorn being a compact, attractive village which has good paths &amp; lighting to ensure locals can work &amp; access all amenities on foot &amp; cycle, building on its community spirit, safety and happiness.</p> <p>Housing policies seek to restrict the total number of dwellings per site to 30; restrict the release of sites through phasing and stipulate a maximum density of 30dph. MBC notes this approach does not seem to take appropriate account of the NPPF in relation to housing land supply.</p> <p>The Neighbourhood Plan considers that the SHLAA allocations for Headcorn in the Regulation 18 consultation for Maidstone's Local Plan represents an oversupply of houses relative to the sustainable level proposed in the Neighbourhood Plan, and that alternative sites could potentially better meet Headcorn Parish's requirements. However, the Neighbourhood Plan states that not all sites identified will be needed in the current plan period. The Neighbourhood Plan phasing policy would restrict their release.</p> <p>Developer states that the phasing of development through policies HNP 6 and 7 will make the plan incapable of responding to changes in demand and provide an immediate barrier to the ability of the LPA to respond to NPPF policy with regard to a current critical shortfall in its 5 year supply. The plan is inflexible and inhibits housing delivery that is required in the NPPF.</p> <p>Release 30 units every five years is totally unrealistic in terms of commercial viability. The development industry as a whole would have no serious concerns with regard to selling houses on a site in excess of 30 dwellings. In recent years local agents have not had the opportunity to sell houses on sites of 30+ units therefore their assessment is not based on experience.</p> <p>The draft NP fails significantly short of meeting the requirements of the area and thus the NPPF due to the limited number of sites proposed, as well as the scale and very slow phasing of the proposed allocations. Para. 184 of the NPPF states that 'Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.'</p> <p>Asserts that the NP does not follow the guidance set out in the NPPF in that it fails to "plan positively to support local development" and fails to reflect the national policy objective to increase the supply of housing land and the document does not allocate land for housing, in particular. In terms of conformity with the Maidstone Boroughwide Local Plan of 2000 and its saved policies, it fails to recognise this background and the newly emerging Maidstone Local Plan. The overall tone and spirit of the document is negative, and this is reflected in a key base assertion that Headcorn is 'remote'. The village is a strong rail commuter village with good bus transport - in our view it cannot be considered remote.</p> <p>The level of future housing supply at 145 new dwellings is too low. The Borough Council has an urgent need for housing sites to augment its current five year land supply. WH asserts that currently, there is a 2,000 unit shortage, and, without evidence that Headcorn is a sustainable location which has to make a significant contribution to the needs of the Borough.</p> <p>The Council has to find sites to accommodate 2,000 dwellings. Therefore it is possible that the existing draft allocations as set out for Headcorn will be confirmed and possibly additional sites added.</p> <p>WH strongly objects to the 145 dwellings figure as it is too small. The Neighbourhood Plan needs greater flexibility.</p> <p>JCN Developments contents that it is not appropriate for draft policies HNP6 &amp; HNP7 to restrict the number of new homes to just 30 over a five year period. It is clear that the village has a role to play in accommodating a much larger number of new homes and, to align with the strategic needs and priorities of the borough, the Neighbourhood Plan must accommodate a much greater level of residential development.</p>	<p>There was clear concern from developers and MBC about the legitimacy and evidence for this policy.</p> <p>HPC regards this as a key policy within the plan and it serves two purposes., one is to allow the policy requirements within the Pplan to vary depending on the size of development and, secondly, to set a cap of 30 dwellings on the size of an individual development. This approach enjoys very strong support from residents (who were explicitly asked about this in the residents' survey) as well as from estate agents. The rationale for the policy was therefore expanded to make clear why the policy is justified, but the policy itself is left unchanged.</p> <p>HPC notes that several other Neighbourhood Plans have successfully imposed a cap of this nature, including Tattenhall, which is the Cheshire West equivalent of a rural service centre. Therefore there is no reason why the Headcorn Neighbourhood Plan cannot do this, and the evidence supporting it in the case of Headcorn is significantly more extensive than in the cases of other examples such as Tattenhall and Hook Norton.</p> <p>Kent Police raised concerns about the impact of housing numbers on crime, which would support the adoption of smaller housing developments.</p>

<p>Gladman asserts the HNP is not sufficiently pro-growth nor is it able to respond rapidly to changes in the marketplace. Gladman reiterates that the proposals throughout the HNP effectively restrict growth by not supporting any developments over 30 units in size without any robust evidence for this approach. Gladman contends that this does not align with ethos of the Framework. For these reasons the HNP gives rise to legal flaws and is liable to be subject to judicial review proceedings as it contrary to basic conditions (a), (d), (e) and (f).</p>	<p>Assertions without evidence. HPC considers that the NP complies with the Basic Conditions of the NPPF. Refer to the Statement of Basic Condition that accompanies this NP.</p>
<p>Gladman asserts that considers that a 30 dwelling cap [on any development] is not sustainable and therefore not appropriate for any further residential developments coming forward in the settlement.</p>	
<p>Policy HNP6 states that the maximum size of any housing development to come forward in Headcorn will be thirty dwellings. Gladman considers that this is not justified due to the lack of sound evidence and is overly restrictive for the current and future housing needs of Headcorn and Maidstone Borough as a whole. Gladman consider that this policy is not consistent with the core planning principles of the Framework.</p>	
<p>Gladman asserts that the restrictive policies in the neighbourhood plan, including the restraint against all development over 30 dwellings, provides no basis for allowing sustainable development to take place and little flexibility should the plans draft allocations not be able to sufficiently deliver at the levels envisaged.</p>	
<p>At present the HNP is not supporting the wider housing needs of Maidstone Borough and will not be compliant with the Basic Conditions test for Neighbourhood Plans.</p>	
<p>The opening statement of section 6 is incorrect, and again represents a fundamental flaw in the Plan. The housing requirements of Headcorn are to cater for a proportion of the housing needs of the Maidstone Borough as a whole as well as those of the local parish community.</p>	
<p>Wealden Homes asserts without evidence that the analysis in the NP is flawed as Headcorn is not remote. The London job market has a significant influence on the village as it has a very good commuter rail services in to London. Headcorn is an accessible location where residents have a wide choice of employment opportunities in Maidstone, Tonbridge, Tunbridge Wells and Ashford. In the South East the commuter pattern is different to the position in other regions of England.</p>	
<p>Gladman asserts that the housing policy HNP6 (and HNP1 setting out preconditions for housing development) does not provide sufficient flexibility for situations of undersupply of market housing in the Borough. Gladman consider that this approach is contrary to the presumption in favour of sustainable development as outlined in paragraph 14 of the Framework and is therefore in conflict with Basic Conditions (a), (d) and (e).</p>	
<p>Gladman considers that the HNP constrains housing and is inconsistent with the Framework which lists a number of Core Planning Principles, one of which states "Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth." The Neighbourhood Plan does not take this approach.</p>	<p>HPC disagrees with Gladman's opinion. The development scenario for Headcorn has been built 'bottom up' based on what growth and at what rate of growth the village can sustainably accommodate and then rank the sites proposed by MBC in their SHLAA against consistent sustainability criteria. It is not a requirement for an NP to be developed against future [national] Local Plans. It needs to be in general conformity with the existing Local Plan.</p>
<p>Gladman does not believe that the residents survey results provide sufficient, robust evidence for the approach taken and the proposed 30 dwelling cap. This results in a constraint to development for the area.</p>	
<p>Policy HNP6 states that the maximum number of dwellings that can come forward as part of any development in Headcorn will be 30 dwellings, which sets an unjustifiable restriction to development and would hinder the potential to deliver housing within Headcorn.</p>	<p>This is an opinion as to the viability of the sites. There are a number of recent developments in Headcorn of site of less than 30 units. There are ample sites available and deliverable that can contribute to meeting Headcorn's housing growth needs. It is just that landowners have not all offered their land to MBC.</p>
<p>Gladman does not consider that the cap of 30 dwellings as part of any development in Headcorn is appropriate, as each site will have its own issues and benefits and must be assessed on its own individual merits. To set an arbitrary cap of 30 dwellings would restrict the supply of housing within Headcorn.</p>	

				Site H1(39) - Hazel pits - supported only if small scale.	Lower part of site H1(39) ranked highly in Site Sustainability Assessment. Upper part did not.
				Plea for smaller developments	Supportive of relevant NP Policies
				Hazel pits and sites along Lenham Road should be reduced in size.	
				Wealden Homes asserts that to reference the planning permissions quoted since 2011 is misleading and more historical picture over the last twenty years needs to be considered.	The reference to housing number since 1/4/2011 is made in order to tie in to the MBC LP 2011-2031.
				Neighbourhood Plans should be based on a clear and deliverable vision. However, as proposed the HNP is not based on a deliverable vision as the suite of policies contained within it will have a detrimental impact on sites to come forward within the village to be delivered viably due to the restrictive nature of some policies	This is a mere opinion as to the viability of the sites. There are a number of recent developments in Headcorn of site of less than 30 units.
				Ullcombe PC supports the suite of HPC policies on Housing, rate of development, affordable housing - 20% (not 40%) should be in the form of social housing, but with the split in favour of shared equity rather than social rented housing, 10% in the form of self build plots for those with a connection to the Parish and developers to provide some housing specifically to meet needs of the elderly.	
				No references to the 'open rental market' in the NP.	Rental properties are referenced in fig. 25.

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7	7	Phasing of house building in Headcorn	10	29	15		
						Support for controlled growth in housing.	There was strong support amongst residents for the impact of this policy on housing numbers in the Parish. This policy was queried by developers and MBC. However, the NPPF makes clear that it is important to consider the timing of developments and other Neighbourhood Plans, such as Winslow, have used phasing (albeit by allocating sites). This is a key policy for Headcorn, because without it development is likely to significantly exceed assessed need, which would be contrary to paragraph 54 of the NPPF, not to mention the Government's recently published policy on promoting productivity. To make this reasoning clear, an explicit assessment of housing need in Headcorn is now provided. This had originally been contained in Driver (2014), but it was thought to be helpful to make it explicit within the NP, given the queries over evidence. Three different methods for assessing gross housing need amongst emerging households are discussed (including one based on MBC's SHMA calculations) and the highest number is used to minimise the risk of under provision. The assessment then makes clear how the net need has been calculated – again always using the option that would maximise need. This analysis makes clear that any need for additional housing in Headcorn is extremely limited, if not non-existent.
						Housing policies seek to restrict the total number of dwellings per site to 30; restrict the release of sites through phasing and stipulate a maximum density of 30dph. MBC comments that this approach does not seem to take appropriate account of the NPPF in relation to housing land supply. The Neighbourhood Plan considers that the SHLAA allocations for Headcorn in the Regulation 18 consultation for Maidstone's Local Plan represents an oversupply of houses relative to the sustainable level proposed in the Neighbourhood Plan, and that alternative sites could potentially better meet Headcorn Parish's requirements. However, the Neighbourhood Plan states that not all sites identified will be needed in the current plan period. The Neighbourhood Plan phasing policy would restrict their release.	It was felt by HPC that some limited housing within Small and Larger Village Developments (as defined by HNP6) could be helpful, to minimise the risk of coordination failures, but this should be provided later in the plan period. Recognising that Southern Water's funding round made it unlikely that the requirements of HNP11 would be satisfied until the early 2020s, as well as the risk that very significant development might occur in the village in the short run (depending on the outcome of call in requests) it was decided to alter the timing of this policy. Therefore the same amount of housing will be delivered through the types of development covered by this policy (90 units), but it will be divided over the last two periods of the plan. In addition the reviews of housing need (previously contained under the monitoring activities) have been added to the policy (for 2021 and 2026) to ensure Headcorn's assessed needs can be met and targets adjusted if necessary.
						Site H1(39) - Hazel pits - supported only if small scale.	
						Crucial factor is [development] size as well as number.	
						Headcorn is fine as it is we do not need anymore large developments	Supportive of relevant NP Policies
						Plea for smaller developments	
						No more building in Headcorn.	An NP that specifies no further development would not be in compliance with the legislation
						No more building in Headcorn.	
						The phasing of development through policies HNP 6 and 7 will make the plan incapable of responding to changes in demand and provide an immediate barrier to the ability of the LPA to respond to NPPF policy with regard to a current critical shortfall in its 5 year supply. The plan is inflexible and inhibits housing delivery that is required in the NPPF.	This is an opinion/assertion and not evidence based. The developer's objection is based on his economics.
						The draft NP falls significantly short of meeting the requirements of the area and thus the NPPF due to the limited number of sites proposed, as well as the scale and very slow phasing of the proposed allocations. Para. 184 of the NPPF states that 'Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.'	Assertions without evidence. HPC considers that the NP complies with the Basic Conditions of the NPPF. Refer to the Statement of Basic Condition that accompanies this NP.
						The Policy would not deliver key infrastructure, as individually none of the very slow releases of housing land proposed in the NP will be able to pay for the upgrades in, for example, sewerage, that they will generate a need for.	
						Slow phasing inhibits investment in infrastructure and will generate very little by way of financial contributions to address the rather incremental growth that the NP proposes. This fails to meet the three dimensions of sustainable development that run through the NPPF, being the economic, social and environmental roles required.	This comment is an opinion. Not evidence based. In fact to the contrary, there has been no infrastructure provided of late despite there having been material growth in the village. Indeed recent S106 agreement have not benefitted the village infrastructure.
						The level of future housing supply at 145 new dwellings is too low. The Borough Council has an urgent need for housing sites to augment its current five year land supply. WH asserts that currently, there is a 2,000 unit shortage, and, without evidence that Headcorn is a sustainable location which has to make a significant contribution to the needs of the Borough.	
						The Council has to find sites to accommodate 2,000 dwellings. Therefore it is possible that the existing draft allocations as set out for Headcorn will be confirmed and possibly additional sites added.	

<p>WH strongly objects to the 145 dwellings figure as it is too small. The Neighbourhood Plan needs greater flexibility.</p>	
<p>Phasing is not defined and controlled by field boundaries. The reference to "(and developers' land banks)" is inappropriate and does not make sense.</p>	
<p>The opening statement of section 6 is incorrect, and again represents a fundamental flaw in the Plan. The housing requirements of Headcorn are to cater for a proportion of the housing needs of the Maidstone Borough as a whole as well as those of the local parish community.</p>	
<p>Release 30 units every five years is totally unrealistic in terms of commercial viability. The development industry as a whole would have no serious concerns with regard to selling houses on a site in excess of 30 dwellings. In recent years local agents have not had the opportunity to sell houses on sites of 30+ units therefore their assessment is not based on experience.</p>	<p>HMT believes that it does not seek to limit development outside those sites identified in the plan without regard to objectively assessed housing needs. The HNP housing numbers are built up numbers based on what can be sustainability absorbed by the receiving community together with a number of sites that are ranked the highest in terms of sustainability tests. HPC considers that the NP complies with the Basic Conditions of the NPPF. Refer to the Statement of Basic Condition that accompanies this NP.</p>
<p>Housing growth will inevitably mean use of the train service as this is an attractive service to the London commuter in particular. Hence, it is likely that train usage will increase as well as some car vehicle trips.</p>	
<p>JCN Developments contends that it is not appropriate for draft policies HNP6 &amp; HNP7 to restrict the number of new homes to just 30 over a five year period. It is clear that the village has a role to play in accommodating a much larger number of new homes and, to align with the strategic needs and priorities of the borough, the Neighbourhood Plan must accommodate a much greater level of residential development.</p>	
<p>Gladman asserts that the HNP seeks to restrict development outside of those sites proposed for allocation without regard to objectively assessed need, which is contrary to the Governments' national policy imperative to 'significantly boost the supply of housing'. Gladman contends that as a result, the HNP proposes an approach which is inconsistent with the Framework and PPG. It cannot be appropriate to 'make' the plan without having regard to national planning policy and guidance. Furthermore it will not contribute to sustainable development and will not be in conformity with strategic policies in the development plan as these are not yet determined.</p>	
<p>The building of 70 additional (windfall) dwellings as a projection should be referenced by an analysis over the past 20 years to see the historical trend.</p>	<p>The statements in the NP are based on analysis of historical trends and the methodology is in line with the NPPF guidelines.</p>
<p>The (draft) HNP covers the period 2011-2031 and has been published prior to the adoption of the emerging Maidstone Borough Local Plan. The Neighbourhood Plan cannot set a quantum of growth for housing or seek to position Headcorn within a settlement hierarchy for Maidstone as there is no up to date Local Plan in place that deals with this at a Borough wide level. Whilst some housing growth is planned within the Neighbourhood Plan (around 250 – 280 dwellings across the plan period), there is no full evaluation on the deliverability of each of the proposed sites or evidence that the quantum of development will accord with that set out in the emerging MBLP in order to meet the Full Objectively Assessed Housing Need for Maidstone Borough Council.</p>	<p>The development scenario for Headcorn has been built 'bottom up' based on what growth and at what rate of growth the village can sustainably accommodate and then rank the sites proposed by MBC in their SHLAA against consistent sustainability criteria. It is not a requirement for an NP to be developed against future [notional] Local Plans. It needs to be in general conformity with the existing Local Plan.</p>
<p>Gladman comments that throughout the HNP it is stated that the location of Headcorn is a reason to restrict the amount of housing to come forward within the settlement. This is inconsistent with the NPPF and the core planning principles as it does not seek opportunities to meet the development needs of the area or Maidstone Borough as a whole. Notwithstanding this Gladman disagrees that there is a lack of accessible facilities and services within Headcorn and public transportation links that make Headcorn a thriving, sustainable settlement and an appropriate location for growth.</p>	<p>It is not within the remit of a NP to develop links to the greater area. The NP merely seeks to establish that Headcorn is remote from major places of employment and residence and thus not competitive, attractive nor sustainable as a place from/to which to commute.</p>
<p>The MBC LP is an emerging development plan document and there are no current timescales as to when it can be adopted, it is therefore possible that further evidence work may be required including increasing the housing requirement. If this is the case the Council will have to identify additional sites to accommodate this growth. Sites on the edges of identified sustainable settlements, such as Headcorn will be required to meet this need and it therefore cannot be the purpose of a Neighbourhood Plan to seek to restrict this growth.</p>	<p>The HNP has a plan period of 2011/12- 2030/1 which is aligned with the expected planning period for MBC LP.</p>

<p>The HNP is not flexible in its current form and seeks to constrain sustainable development coming forward in Headcorn to meet future needs over the plan period and fails in its current form to plan positively for the development and infrastructure needs of Headcorn in line with objectives, principles and policies of the Framework. The HNP promotes limited development, which is inconsistent with the Framework. In its current form the HNP is therefore inconsistent with the requirements of paragraph 157 of the Framework and is therefore unable to meet basic condition (a).</p>	<p>HMT believes the HNP is in general compliance with the MBWLP 2000 and seeks to be compliant with subsequent emerging Policies and Plans as they are emerging. See the Basic Conditions Statement that accompanies the HNP. Furthermore, HMT believes it is not the role of the NP to set out the infrastructure requirements and plans for the Designated Area. That is the duty of the statutory service providers and agencies.</p>
<p>The HNP fails to have a clear understanding of the housing needs for the area. There is no adopted housing requirement for Maidstone Borough Council in place and as such the HPNP may not be able to deliver the amount of housing units that could be required following the adoption of the MBC LP.</p>	<p>The HNP is in general compliance with the MBWLP 2000 and seeks to be compliant with subsequent emerging Policies and Plans as they are emerging. See the Basic Conditions Statement that accompanies the HNP. HMT does not agree that it is necessary for the HNP to await the making of the MBCLP that is currently in preparation.</p>
<p>As the emerging Local Plan for Maidstone and its supporting evidence base are yet to be produced, the HNP is unable to plan for all sustainable development needed in the parish as it has yet to be determined. However in line with the requirements of the NPPF the document should be pro-growth and not set arbitrary limits on growth.</p>	<p>HMT disagrees with Gladman's opinion. The development scenario for Headcorn has been built 'bottom up' based on what growth and at what rate of growth the village can sustainably accommodate and then rank the sites proposed by MBC in their SHLAA against consistent sustainability criteria. It is not a requirement for an NP to be developed against future [notional] Local Plans. It needs to be in general conformity with the existing Local Plan.</p>
<p>Gladman opines that the HNP seeks to make policy judgements that have yet to be determined through the emerging Maidstone Borough Local Plan, as proposed does not provide flexibility and has been based upon a restrictive approach to growth. This is contrary to the ethos of the Framework and the presumption in favour of sustainable growth and development.</p>	<p>HMT disagrees with Gladman's opinion. The development scenario for Headcorn has been built 'bottom up' based on what growth and at what rate of growth the village can sustainably accommodate and then rank the sites proposed by MBC in their SHLAA against consistent sustainability criteria. It is not a requirement for an NP to be developed against future [notional] Local Plans. It needs to be in general conformity with the existing Local Plan.</p>
<p>Gladman asserts that the HNP currently constrains the delivery of future sustainable development which is contrary to paragraphs 14, 47 and 173 of the Framework and therefore fails to provide a positive approach to plan making.</p>	<p>HMT disagrees with Gladman's opinion. The development scenario for Headcorn has been built 'bottom up' based on what growth and at what rate of growth the village can sustainably accommodate and then rank the sites proposed by MBC in their SHLAA against consistent sustainability criteria. It is not a requirement for an NP to be developed against future [notional] Local Plans. It needs to be in general conformity with the existing Local Plan.</p>
<p>The NPPF sets out the Government's goal to significantly boost the supply of housing. Gladman asserts that the approach taken in the NP is directly counter to this government objective and is therefore contrary to the requirements of basic conditions (a) and (d).</p>	<p>To Consent a small number of large developments early in the planning period is arguably less responsive to market conditions as they unfold. The need for early Consents by developers is driven by their need for land banks and the financing security that such landbanks provide. This is of no concern to the community. Indeed it is unattractive for a community to have so much land, effectively, sterilised against development by others.</p>
<p>Gladman asserts that the HNP does not allow sufficient flexibility and will be unable to respond rapidly to changing market conditions. The neighbourhood plan as proposed will likely reduce the ability of Maidstone Borough to meet its objectively assessed housing needs. The HPNP in its current form is therefore contrary to paragraph 040 of the PGG.</p>	<p>The development scenario for Headcorn has been built 'bottom up' based on what growth and at what rate of growth the village can sustainably accommodate and then rank the sites proposed by MBC in their SHLAA against consistent sustainability criteria.</p>
<p>Assertion that due to the new Local Plan being at such an early stage, it is unclear what the preferred spatial strategy will be, or the scale of growth that the MBLP will seek to accommodate. The HPNP is therefore premature in plan-making terms in that the strategic priorities for the District are yet to be determined.</p>	<p>The HPNP needs to be flexible and be able to adapt to changing circumstances as it may be the case that the Council may have to increase their housing numbers and additional growth may be attributed to this tier of settlements.</p>
<p>The HPNP needs to be flexible and be able to adapt to changing circumstances as it may be the case that the Council may have to increase their housing numbers and additional growth may be attributed to this tier of settlements.</p>	<p>HMT believes the HNP is in general compliance with the MBWLP 2000 and seeks to be compliant with subsequent emerging Policies and Plans as they are emerging. See the Basic Conditions Statement that accompanies the HNP. We agree with Gladman that MBC is failing in its duty to provide timely and realistic housing targets for the Borough and an evidence based spatial policy. HPC is committed to playing its part in the MBC LP once it is 'made'. Until that time HMT believes it is preparing a NP that is in general compliance with the MBWLP 2000 and seeks to be compliant with subsequent emerging Policies and Plans as they are emerging. See the Basic Conditions Statement that accompanies the HNP.</p>
<p>The HNP will need to be more responsible and flexible in order to support the strategic policies of the wider local authority area.</p>	<p>The HNP does not take account of the relevant evidence regarding the economic, social and environmental characteristics and prospects for the area. Maidstone Borough Council is failing to identify housing at its target rate across the Borough. Therefore, Headcorn will have to play its part in delivering sustainable development to help address this shortfall to ensure sufficient housing is delivered to meet the identified housing needs.</p>
<p>The HNP does not take account of the relevant evidence regarding the economic, social and environmental characteristics and prospects for the area. Maidstone Borough Council is failing to identify housing at its target rate across the Borough. Therefore, Headcorn will have to play its part in delivering sustainable development to help address this shortfall to ensure sufficient housing is delivered to meet the identified housing needs.</p>	<p>As there is no Local Plan at an advanced enough stage for the HNP to align itself with, Gladman opines it would be more appropriate to progress the Neighbourhood Plan once the emerging Maidstone Borough Local Plan has been successfully tested at Examination and subsequently adopted.</p>
<p>As there is no Local Plan at an advanced enough stage for the HNP to align itself with, Gladman opines it would be more appropriate to progress the Neighbourhood Plan once the emerging Maidstone Borough Local Plan has been successfully tested at Examination and subsequently adopted.</p>	<p>HMT does not agree that it is necessary for the HNP to await the making of the MBC LP that is currently in preparation.</p>

					<p>Due to the new Local Plan being at such an early stage, and with ground to make up to meet the requirements of soundness and the duty to cooperate, it is unclear what the preferred spatial strategy will be, or the scale of growth that the MBLP will seek to accommodate. The HPNP is therefore premature in plan-making terms in that the strategic priorities for the District are yet to be determined.</p>	<p>It is not a requirement for an NP to be developed against future [notional] Local Plans. It need to be in general conformity with the existing Local Plan.</p>
					<p>At present the HNP is not supporting the wider housing needs of Maidstone Borough and will not be compliant with the Basic Conditions test for Neighbourhood Plans and therefore will fail at Examination.</p>	<p>Assertions without evidence. HPC considers that the NP complies with the Basic Conditions of the NPPF. Refer to the Statement of Basic Condition that accompanies this NP.</p>
					<p>At present the HNP is not supporting the wider housing needs of Maidstone Borough and will not be compliant with the Basic Conditions test for Neighbourhood Plans and therefore will fail at Examination.</p>	
					<p>The vibrant Headcorn High Street is a very delicate asset and will only survive if it is used by more people. Should Headcorn promote events to bring in shoppers – or indeed could it do this? Additional housing may well be essential for the survival of Headcorn. Trying to build a plan on the wish for no more houses without considering all the consequences is unlikely to produce a good result for the village. The issue may not be trying to stop development of housing but how does Headcorn attract more residents.</p>	<p>This has been recognised and espoused by the HMT and HPC in all relevant communications and the current mandated policy is for ca. 250 additional houses over the plan period. The NP reflects this. I do not understand the genesis of '.....especially given the various comments in the draft plan about the difficulties Headcorn has experienced in attracting residents.'. Headcorn has a local reputation for being a popular village [to live in] I conclude this remark is based on a 'grow or die' mantra.</p>

Rev 14 Policy Number	Rev 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
8	8	Self-build housing	7	2	5	<p>MBC comments that the SHMA identifies the need for different types of tenure of affordable housing through the period of the local plan. Across the borough as a whole, it is estimated that some 67% of need is for social or affordable rent tenures, whilst around 33% is for intermediate housing. An indicative target of 70% affordable/social rent and 30% intermediate housing is recommended in emerging policy, but which also gives flexibility subject to viability and/or evidence of the needs for different tenures at the time of the application. Self build is supported but setting a particular percentage target within the overall affordable housing target, however, is not feasible or practical in working practice.</p> <p>The requirement of 10% of plots to be self-build needs to be based on robust evidence in order to be in line with paragraph 021 of the PPG. Gladman does not consider the evidence used to suggest that this is a viable option in Headcorn is robust enough and therefore is not in line with Planning Practice Guidance.</p> <p>HPC needs to consider the practical environmental impact of self build plots as they will not be supported by developers as part of a larger scheme. If this is a key issue, deliverable sites should be found and allocated as such.</p> <p>It is total folly to have self-build plots in the middle of sites with 10+ houses.</p> <p>Housing growth will inevitably mean use of the train service as this is an attractive service to the London commuter in particular. Hence, it is likely that train usage will increase as well as some car vehicle trips.</p> <p>Gladman states that the HNP proposes that 10% of new housing should be self-build or co-operatives through policy HNP8.</p> <p>Ulcombe PC supports the suite of HPC policies on Housing, rate of development, affordable housing - 20% (not 40%) should be in the form of social housing, but with the split in favour of shared equity rather than social rented housing, 10% in the form of self build plots for those with a connection to the Parish and developers to provide some housing specifically to meet needs of the elderly.</p> <p>Individual houses ie self builds would help retain the villages character rather than large estates with identical builds</p> <p>Individual houses ie self builds would help retain the village atmosphere.</p> <p>Support for self build is to be congratulated as this leads to less bland non descript estate housing and invariably leads to better designed houses that are more likely to be an asset to the village character</p> <p>Encouraging self builds will ensure passion and attention to detail of character properties &amp; a boost to Headcorns local economy.</p> <p>Also support self-build, and buildings that fit with the character (not 'lego land' please).</p>	<p>MBC and developer comments about the difficulty of imposing a self build plot quota on developers have been recognised, however the policy remains and encourages self build without making it a requirement. To provide an incentive to developers to do this, self build plots provided will be outside the cap on development size (HNP6) and will not count towards numbers in HNP7. Definition of 'self build' and 'custom build' is now explicit (as suggested by MBC). This specific policy is now looking to promote self build, as this is more likely to help younger residents with less capital, who have more energy and micro developments will act to provide opportunities for custom build more generally. Following MBC comments about group self build options, possibly as affordable housing, introduced an option for community self build for those with strong links to Headcorn under Policy HNP8B.</p> <p>An assertion not supported by evidence and contrary to historical data.</p> <p>Supportive of related HNP policies.</p> <p>Specific supportive statements for self build.</p> <p>Specific supportive statements for self build as it enhances the village character.</p>

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9	9	Affordable homes	6	4	12	<p>MBC comments that the local plan identifies the infrastructure required to support new development and that this approach would represent local needs housing of which strict local connection occupancy criteria applies to such schemes. Local needs housing seeks to address the lack of general supply by allowing the development of exception sites under agreed local needs, sustainability and environmental criteria. The housing must remain affordable in perpetuity and priority will be given to occupants who have a specified connection to the settlement – often being residential, employment or family. General mainstream development sites of which carry affordable housing obligations cannot therefore just be ring fenced to local residents. Local residents in need of affordable housing on the council's housing register however will still have the opportunity to bid and be considered for available affordable homes. MBC Housing will work with Parish Councils and local stakeholders to bring forward local needs housing in rural communities, where this has been proven necessary by a local needs housing survey undertaken by or on behalf of the Parish Council(s) concerned. This approach is supported in emerging Local Plan Policy (DM25). The recognised need for smaller accommodation coincides with identified need on the Housing Register (over 70% have a one and two-bed need). Smaller accommodation is therefore welcomed to help meet this need, but with an appropriate balance of larger accommodation to cater for growing families and to prevent overcrowding. MBC comments that viability testing demonstrates that a 40% affordable housing rate can be achieved in the rural areas. The council acknowledges that neighbourhood plans need to be considered in the wider housing and planning context. Their relevance will be better highlighted in the Regulation 19 version of the Maidstone Borough Local Plan, but should not be specifically included as part of the affordable housing policy. This proposal is quite a significant step away from emerging policy and as such will not be able to be supported as the starting point for all schemes with affordable housing obligations.</p> <p>MBC comments that HNP9 (Affordable homes) applies to Larger Village Developments of 10 – 30 dwellings (as defined in HNP9) and sets the target for affordable housing as 20% and that it is proposed that the split between social rented housing and shared equity housing should favour shared equity, with the first two out of every three affordable housing units being shared equity with developers being expected to work with Headcorn Parish Council to try and ensure these homes are allocated to those with a local connection. The Council's adopted Affordable Housing DPD requires a minimum of 40% affordable housing on sites of over 15 dwellings, and sets out that higher proportions may be sought on greenfield sites. The proposed rate of 20% therefore falls somewhat short of the target in the Development Plan, and is not in general conformity in this respect.</p> <p>In regards to tenure the adopted DPD states that affordable rented housing should constitute not less than 24% of the total number of dwellings (not just affordable). This equates to in excess of 60% of the affordable units being of affordable rented tenure. The proposal in the Neighbourhood Plan to require the majority of affordable units to be for shared equity therefore is not in general conformity with the adopted DPD.</p> <p>It should be noted also that the Maidstone Strategic Housing Market Assessment (2014) identifies a significant need for new affordable housing through the period of the new Local Plan, and establishes an on-going requirement for a tenure split in the region of 70 / 30 in favour of affordable or social rented accommodation. There is no evidence to indicate that self-build housing would meet the needs of those requiring affordable housing or that all housing specifically designed to meet the needs of the elderly would be affordable.</p> <p>Affordable housing is 9th in the priorities for infrastructure spending in Headcorn (Policy HNP32)</p> <p>As drafted, Policy HNP9 would not be in general conformity with this strategic adopted policy as it does not seek at least 40% affordable housing and it contains a preference for shared equity housing over rented accommodation.</p> <p>MBC comments that aspirations for renting/buying need to also be considered in a wider context. Just taking views from a residents only survey gives a distorted view of the overall borough wide situation. There is no reference or consideration given to the findings of the Maidstone Strategic Housing Market Assessment 2014 and 2015 (SHMA).</p> <p>MBC comments that its SHMA identifies the need for different types of tenure of affordable housing through the period of the local plan. Across the borough as a whole, it is estimated that some 67% of need is for social or affordable rent tenures, whilst around 33% is for intermediate housing. A ratio of 70% affordable rent and 30% intermediate was tested in the Viability Study and has been shown to be viable. An indicative target of 70% affordable/social rent and 30% intermediate housing is recommended in emerging policy, but which also gives flexibility subject to viability and/or evidence of the needs for different tenures at the time of the application. Housing supports in principle working with affordable housing providers and other partners to provide affordable self-build plots for local people in housing need. Setting a particular percentage target within the overall affordable housing target, however, is not feasible or practical in working practice. Self-build is an important element of the government's housing strategy, and supports action to help new house building firms and get empty and redundant buildings back into productive use. New planning practice guidance will be introduced to ensure councils establish the demand for self-build in their area, as well as take steps to help aspiring self-builders. This will include compiling a local register of people who want to build their own home. The DCLG prospectus on Right to Build, launched by Nick Boles, makes a distinction between "self-build" and "custom build". It says custom home building "typically involves individuals or groups ... commissioning the construction of a new home or homes from a builder, contractor or package company". Meanwhile, self-build involves "physically building a house for themselves or working with sub-contractors", but is also encompassed by the broader term custom build. Affordable self-build projects could be based on less expensive land, the kind that is usually developed under exceptions planning policy to provide affordable housing for local people. If someone has some land and wants to have an affordable home built for themselves or a member of their family, they would need to meet certain requirements in terms of council housing and planning policies. Requirements for affordable self-build housing are yet to be considered and agreed by the council. This would need to be defined within the Affordable Housing SPD document. The reference to "meeting the needs of the elderly" is welcomed as housing are keen to see the needs of an ageing population are met, but this should also extend to those who may be disabled.</p> <p>HNP seeks to set the amount of affordable housing to come forward within the settlement at 20% through policy HNP9. This falls short of the adopted requirement for Maidstone at 40% and Gladman asserts that the Neighbourhood Plan therefore fails to meet the basic conditions and is inconsistent with the Local Plan.</p> <p>Policy HNP9 states that the target for affordable housing would be set at a requirement of 20%. Although Gladman could support this level of affordable housing requirement, the level set within the adopted Maidstone Local Plan is 40% and therefore the HNP9 is not in conformity with basic condition (e).</p>	<p>In responses from residents, 89% supported this policy. MBC queried this policy, on the grounds of Borough-wide need. However, this policy was developed to meet identified need in Headcorn (in line with paragraph 54 of the NPPF). To make it clear, how need was calculated, explanation of the calculations in Driver (2014) was added to the text. MBC has been unable to supply the data supporting its arguments and had given no indication of whether it was possible to provide the data, so HPC decided to stick with the existing analysis of need in Headcorn, which is based on the Residents' Survey, to underpin the proposed provision within this policy. This evidence suggests that demand for social rented housing can be met from within the existing housing stock in Headcorn.</p> <p>HPC notes that although the policy on affordable housing in Maidstone's Development plan envisaged 40% provision, the Development Plan itself envisaged only minimal housing growth in Headcorn, meaning the policy was not developed with housing in Headcorn in mind. Although the emerging Local Plan also envisages 40% affordable housing in rural areas, it has only been tested on viability not sustainability grounds. HPC believes/feels that the impact of distance to employment centres, secondary schools, hospitals, ANGST space etc will particularly disadvantage those on low incomes (the intended recipients of affordable housing). This means Sustainability considerations make it important to align provision to local need. This includes the split between shared equity and social rented housing, with Headcorn's Residents' Survey identifying significantly more demand for shared equity housing.</p> <p>Finally, HPC notes that although the headline rate for provision is lower than envisaged by MBC (20% not 40%) it will kick in for smaller developments (with a threshold for provision of 10 not 15 houses), meaning the impact of this policy on provision may be less negative than feared by MBC.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
10	10	Housing for the elderly and those with disabilities	5	0	7	<p>Policy HNP10 was welcomed by MBC. It is being recommended in emerging Local Plan Policy (DM24) that MBC will seek provision of 20% affordable housing for schemes that provide for retirement housing and/or extra care homes. It is further recognised that to truly promote sustainable communities there must be a mix of types of housing that are provided in any given development or location. This approach will be supported in emerging Local Plan Policy DM23 (Housing Mix).</p> <p>The [local] plan must take into account the level of assessed need not just within the parish.</p> <p>The SHMA identifies the need for different types of tenure of affordable housing through the period of the local plan. Across the borough as a whole, it is estimated that some 67% of need is for social or affordable rent tenures, whilst around 33% is for intermediate housing. An indicative target of 70% affordable/social rent and 30% intermediate housing is recommended in emerging policy, but which also gives flexibility subject to viability and/or evidence of the needs for different tenures at the time of the application. Self build is supported but setting a particular percentage target within the overall affordable housing target, however, is not feasible or practical in working practice.</p> <p>Wealden Homes states that it supports the concept of providing bungalows for the elderly and it will be making a planning application on land west of the cricket pitch (site HO-131 &amp; 132) in the very near future.</p> <p>Ulcombe PC supports the suite of HPC policies on Housing, rate of development, affordable housing - 20% (not 40%) should be in the form of social housing, but with the split in favour of shared equity rather than social rented housing, 10% in the form of self build plots for those with a connection to the Parish and developers to provide some housing specifically to meet needs of the elderly.</p> <p>Headcorn is an excellent place for the active over 65s who generally have more time to spend shopping in the High Street. The information that there is expected to be a glut of sheltered housing makes it seem even more attractive for those who plan to live here long term!</p> <p>No references to the 'open rental market' in the NP.</p>	<p>Policy renamed to "Housing for the elderly and those with disabilities" following MBC comments. This policy is not specifically designed to provide affordable housing, but to recognise wider need within the community. Following developer comments, added clarification was added that the aim is that (wherever possible) these dwellings should be integrated within schemes, rather than provided in isolation, in line with NPPF requirements on promoting healthy communities.</p> <p>Supportive of Policy HNP10.</p> <p>The NP is intended to argue for a mixed housing stock that is flexible to future demographics and this is, in part, reflected in Policies HNP9 &amp; HNP10</p> <p>Rental properties are referenced in fig. 25.</p>

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11	11	Pre-conditions for housing development in Headcorn village	24	15	12	<p>Preconditions supported, specifically referencing sewage system, parking, school and doctors' surgery</p> <p>Delete Policy HNP11</p> <p>The NP does not contribute to the achievement of sustainable development in that Headcorn NP Policies [create] Barriers to Development - sewage. The Water Act requires the provision of sewerage by the Company to meet demand and the process for this involves the engagement of applicants for planning permission with the services company. With there being no grant of planning permission under this draft policy, there will be no demand for the Water Company to take into account. Thus both investment in infrastructure and development will be prevented by the policy. This is contrary to government NPPF policy as it prevents coordination of development with infrastructure (para 7), prevents the meeting of the development needs of the area (Paras 14 and 15), does not plan positively to support local development (Para 16), drive and support sustainable economic development (Para 17) or support any aspect of government policy on the delivery of a wide choice of high quality homes (para 47) and would act to constrain the LPA's own ability to support that policy.</p> <p>In its current form HNP will deny the ability of the plan to meet the needs of the population, specifically inhibiting the delivery of housing to meet the objectively assessed need. Under Policy HNP12 the NP proposes the allocation of a part of the land known as site HO-70A, land off Kings Road is shown as having an indicative capacity of 50-100 units. The site is critical to the delivery of the NP as it is required to provide the expansion land for Headcorn Primary School referred to. Consequently in its present form the allocation is undeliverable, making both a major potential component of the NP housing supply and the school expansion, with its new access from Ulcombe Road, undeliverable. The site should be extended to include the adjoining land shown in yellow in the NP Appendices, which affords a road access from Ulcombe Road. The combined site is the most sustainable in terms of ease of access to the school and village centre. Further it sits in an enclave of existing development which will limit the effects of development on the landscape. The LPA has already resolved to grant planning permission for it and it is entirely deliverable</p> <p>Gladman considers that policy HNP11 is not consistent with the Framework as it sets out a number of preconditions that must be met before more housing comes forward within the settlement. .</p> <p>Gladman opines that the approach taken in HNP11 (and HNPs 29 &amp; 32), requiring developer contributions towards improvements to the local sewerage network and expansion of the local primary school, is not correct and that it is the responsibility of the sewerage undertaker and the Local Education Authority respectively to manage capacity of these facilities.</p> <p>Policy HNP11 states that there are two conditions that must be met before any more housing development is to come forward in Headcorn, these are improvements to the local sewerage network and the expansion of Headcorn Primary school. The Plan states that both of these facilities are already at capacity and it would be the developer's responsibility to increase their capacities. Again, this seeks to restrict the opportunities for Headcorn to meet its development needs. It is the responsibility of the sewerage undertaker and the Local Education Authority respectively to manage the capacity within these facilities. It is important to point out that a developer is only required to mitigate the impacts of its own proposals rather than attempt to resolve existing infrastructure or capacity issues. Gladman will commit to making CIL compliant contributions as required to mitigate the impacts of any future proposed development.</p>	<p>Following the response from Southern Water the section relating to Sewerage and School Expansion has been separated in to two distinct preconditions.</p> <p>The comments of Southern Water, as well as developers, are noted, however, the preconditions are retained. Policy explanation has been clarified to make clear that developers are not expected to undertake the upgrade to the sewerage system, as it is not their responsibility, unlike a contribution to the cost of extending the infrastructure to accommodate the effects of their developments is. . The responsibility to timely deliver a system that performs to accepted standards with the loads imposed by the existing housing and planned development lies with the service providers and the Local Planning Authority and this is a key reason why commitment by the relevant authorities is needed before further development takes place and is included in Policy HNP11.</p> <p>The fact that Southern Water's own hydraulic modelling shows that sewerage is expected to emerge at low points in the system (in periods of heavy rain) is noted. However, HPC does not accept that because the cause is heavy rain, there is no problem with the capacity of the system. Network infrastructure needs to be able to cope with periods of peak demand, which in the case of Headcorn's sewerage system is periods of heavy rain. It does not matter why the rain is there (although HPC notes that many of the older properties in the village are legitimately allowed to discharge surface water into the sewerage system), it still needs to be factored in to any calculation of capacity.</p> <p>The solution to this may be increased sewerage capacity, or changes to the way that surface water is managed. However, until the necessary changes are both identified and implemented, Headcorn's sewerage system cannot cope.</p> <p>It is fully understood that there is a statutory right for developers to have a connection to drainage and sewage disposal, it is clear from experience in the village that recent new housing has exacerbated the problem of flooding and sewage in certain streets. The LPA (MBC) also needs to impose and enforce conditions to ensure that sewerage and drainage is adequate in any new development. Conditions imposed on developments in the past have clearly been unsatisfactory, therefore this plan seeks to repair the gap that exists between statutory obligations and reality.</p> <p>Natural England supports this policy and the Environment Agency felt that improving Headcorn's ability to deal with high flows via the waste and storm system will help improve the water quality in the River Beult.</p> <p>These statements are not valid for the HNP as a whole merely an objection to the plan because it is not in accord with a planning application that at the time of publishing the Reg 14 was underfoot. This site was proposed as a standalone site (HO-70) by MBC in its SHLAA.</p> <p>HMT is of the view that the purpose of bi-lateral agreements and S106 Agreements is to ensure that developers contribute proportionately to the cost of the infrastructure accommodating the impact of their developments. To include the specific areas of focus in the NP is therefore logical and appropriate.</p> <p>HMT is of the view that the purpose of bi-lateral agreements and S106 Agreements is to ensure that developers contribute proportionately to the cost of the infrastructure accommodating the impact of their developments. To include the specific areas of focus in the NP is therefore logical and appropriate.</p> <p>HNP11 does not preclude the contribution of developers to infrastructure enhancements. It merely states that two specific enhancements - expansion of the school and the sewage system - need to precede investment in additional housing. HPC considers its approach to be compliant with the Basic Conditions requirements of the NPPF.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
12	12	Potential Strategic development sites in Headcorn	12	17	29	<p>Various developers queried why or how sites had been included:</p> <p>There are no sites which have been fully allocated for housing development in the HNP. However, a number of sites have been identified as having the potential for development through policy HNP12. Gladman supports the identification of these sites in part as it makes a good start towards meeting the housing needs of Headcorn.</p> <p>Housing policies seek to restrict the total number of dwellings per site to 30; restrict the release of sites through phasing and stipulate a maximum density of 30dph. This approach does not seem to take appropriate account of the NPPF in relation to housing land supply.</p> <p>The Neighbourhood Plan considers that the SHLAA allocations for Headcorn in the Regulation 18 consultation for Maidstone's Local Plan represents an oversupply of houses relative to the sustainable level proposed in the Neighbourhood Plan, and that alternative sites could potentially better meet Headcorn Parish's requirements. However, the Neighbourhood Plan states that not all sites identified will be needed in the current plan period. The Neighbourhood Plan phasing policy would restrict their release.</p> <p>Question about the future of site west of maidsone Road as a result of the larger proposal for the site emerging post issue of the Reg 14 HNP</p> <p>Concern over ribbon development along Maidstone Road</p> <p>Concern over ribbon development along Maidstone Road</p> <p>Gladman has land interests at land at west of Mill Bank, Headcorn. Gladman considers the site to be suitable, available and deliverable. The site is capable of accommodating up to 70 dwellings (including 40% affordable housing), structural planting and landscaping and informal open space.</p> <p>Gladman supports the reasoning behind HNP12 and is proposing one of the most sustainable sites around Headcorn for development: land to the west of Mill Bank [Maidstone Road?]</p> <p>Gladman considers the site assessment process underlying the neighbourhood plan should take account of the full development capacity of each site including land west of Mill Bank and is therefore contrary to paragraph 040 of the PPG.</p> <p>Queries the relative rating of Site H)-65A solely on the grounds of [relative] distance to village cente [compared with site H1(39)]</p> <p>Review the connectivity of the potential development sites to the village centre and railway station with regard to Site HO-65A in particular.</p> <p>Support of Development NW of Maidstone Road on grounds of good access to A274 northwards.</p> <p>Limit Hazel pits site to 100 houses</p> <p>Hazel pits site sholud be limited to 66 houses</p> <p>Hazel pits site supported only if small scale.</p> <p>H1(39) site - Hazel pits - not supported due to flood risk.</p> <p>H1(39) site - Hazel pits - not supported in its present location due to proximity to school and flood risk.</p> <p>H1(39) site - Hazel pits - not supported on grounds of flood risk.</p> <p>H1(39) site - Hazel pits - not supported</p>	<p>Word "housing" added to policy name to clarify purpose of policy. Rather than specifying exactly how and when sites should come forward, this policy leaves it to developers, but combined with HNP7 will allow control over the phasing of housing provision. HPC believes that allocating sites and deciding on phasing would be unnecessarily arbitrary. The approach taken means that no one site is crucial for the plan, so if an individual site does not come forward, it does not present problems for overall delivery. The policy also provides the flexibility needed to be compatible with HNP6, while still helping to promote the most sustainable sites.</p> <p>A large number of comments on individual sites were received, including comments on access, preferences etc. none negated the Reg 14 Policy HNP12, which remains essentially unaltered. Residents on balance supported the sites identified in the Reg 14 NP as a whole, (73.3%), but there was much less support for individual sites. Site HO-65A (land north west of Maidstone Road) is less attractive than some sites in terms of distance, but was included because it offers the prospect of traffic calming on the A274, a key road safety aim. However, the extent of any development will be small (no more than 30 houses), therefore the results of the assessment of the site as a whole should not be seen as an indicator of the sustainability of a small segment of the site. Given the size of the development envisaged under the Plan, it is likely that the site would be within 800m of almost all the key services in the village (except the station and the GP). This site was the most popular amongst residents.</p> <p>HO-70/HO-7 land between Ulcombe Road and Mill Bank. The developer flagged that excluding the top site made access difficult and therefore both sites should be included because it is key to the delivery of the Plan. HPC note that this site is not key to the Plan (see above). The identified site was very unpopular with residents (only 28.4% supported), so HPC considered dropping the site. On balance decided to retain the southern-most part of the site (HO-70) in case the developer was able to find a way to access via the A274 – the mandated means of access for the contained in the March 2014 Reg 18 Local Plan. HPC notes that in the planning application for this site KCC was expected to buy land for primary school expansion at market prices, meaning there is no specific benefit for including this site, or the additional site associated with it.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
13	13	Site coverage and housing densities for Small and Larger Village Developments in Headcorn village	0	0	2		
						<p>Planning Aid suggested that consideration be given to Policy HNP13 state a range of densities the plan will support (providing evidence supports such an approach), adding something to the effect that the visual design and / or other aspects of a scheme will always be taken into account and density alone will not be a prime consideration.</p>	
						<p>The NP policies seek to restrict the total number of dwellings per site to 30; restrict the release of sites through phasing and stipulate a maximum density of 30dph. MBC comments that this approach in the NP does not seem to take appropriate account of the NPPF in relation to housing land supply. The Neighbourhood Plan considers that the SHLAA allocations for Headcorn in the Regulation 18 consultation for Maidstone's Local Plan represents an oversupply of houses relative to the sustainable level proposed in the Neighbourhood Plan, and that alternative sites could potentially better meet Headcorn Parish's requirements. However, the Neighbourhood Plan states that not all sites identified will be needed in the current plan period. The Neighbourhood Plan phasing policy would restrict their release.</p>	<p>The emerging Maidstone Local Plan seeks a density of at least 30 dwellings per hectare. In the Headcorn Neighbourhood Plan 30 dwellings per hectare is a maximum, this approach is supported by Planning Aid England. For housing development within Headcorn village, the maintenance of housing character has a higher significance than achieving a minimum density figure. The appropriate density for a housing site should result, in every case, in a housing development in character with the surrounding area, respecting its natural and historic environment. This policy is aligned to Section 7 on the NPPF on good design, which recognises the importance of promoting and reinforcing local distinctiveness and ensuring that development fits with the existing built environment.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
14	14	Landscaping in developments and the encouragement of new open and recreational spaces in Headcorn village	2	0	5		
					<p>Natural England notes that many of these features are in fact historically significant spaces or features and that it might be helpful to decision makers to raise the importance of their historical, as well as natural interest, e.g. the parish's network of trees, hedgerows and ponds, for example, stand out as features that reflect the history of human management of the landscape and that contribute to its historic rural and agricultural character and identity.</p> <p>Promote some positive policies to enhance some open spaces and facilities.</p> <p>Suggestion to delete 'fruit trees' from the Policy as this is an inappropriate tree type for protection.</p>	<p>This policy section has been strengthened to reflect comments from Natural England, specifically to emphasise protection of the existing landscape in new developments as well as creating future landscape features. It is noted that in developer responses that they support new open spaces within new developments. The reference to fruit trees in this policy is retained, as it is seen as an important aspect of promoting wildlife. However, HPC notes that it is in the context of landscaping developments.</p>	
					<p>If the Parish Council seeks to designate land as Local Green Space then this should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared.</p> <p>Promote some positive policies to enhance some open spaces and facilities.</p> <p>Also support habitat corridors/ sanctuaries/ nature reserves.</p>	<p>Headcorn Parish Council notes that Headcorn does not have any publically accessible green space of more than 2 hectares, meaning all the sites in Headcorn should be judged as amber against this criterion (including all those in the original study).</p>	

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
15	15	Connectivity and access	14	0	6	<p>Suggestion that Policy HNP15 should be recast to highlight current plans to apply appropriate highway design to ensure highway and pedestrian safety on an local to developments and, where appropriate mitigate effects by offsite works, specifically recognising current plans to provide footpath on Oak Lane, improvements to Lenham Road and to the Wheeler Street/Oak Lane junction.</p> <p>Promote greater restrictions on on-road parking and improved through ways for pedestrians</p> <p>More decent sized open areas/parkland woods needed for walking &amp; leisure.</p> <p>More decent sized open areas/parkland woods needed for walking &amp; leisure, particularly to the east of the village. Consider land south of the railway for additional recreational space.</p> <p>More decent sized open areas/parkland woods needed for walking &amp; leisure</p> <p>More decent sized open areas/parkland woods needed for walking &amp; leisure</p> <p>Concern expressed that with all the development between Grigg Lane and Lenham road there is not enough open green space in the village [and needs to be created as part of the developments].</p> <p>Concern expressed that ALL proposed sites have poor and dangerous vehicular access</p> <p>Provide footpath along Oak Lane</p> <p>Provide footpath along Oak Lane.</p> <p>Consider providing a through or round village cycle route so that people can cycle to the shops without risking riding along the A274</p> <p>More decent sized open areas/parkland woods needed for walking &amp; leisure</p> <p>View expressed that to support Headcorn being a compact, attractive village good paths &amp; lighting is required to ensure locals can work &amp; access all amenities on foot &amp; cycle, building on its community spirit, safety and happiness.</p> <p>Improved bus service needed</p> <p>Promote greater restrictions on on-road parking and improved through ways for pedestrians</p> <p>Provide better connecting thoroughways for pedestrians throughout village</p> <p>A plan of the existing footpaths in the village as an appendix would be helpful. Further, the location of the land to be acquired next to the Beult would be helpful.</p> <p>Concern over increased traffic congestion on A274 between Headcorn and Maidstone.</p>	<p>Comments generally supportive but a concern over safe access for new and existing developments that this policy pursues. Comments on need for improved road safety has been picked up as part of HM Project 5. Policy remains unchanged.</p> <p>A number of pleas for more footpaths into the countryside and suggestions for improving connectivity and safe [pedestrian] access within the village were put forward. These will be picked up as part of HM Project 5.</p> <p>Maps of existng public rights of way/footpaths throughout the parish are available from MBC. Scale prevents them from being usefully reproduced in the NP. However, where these paths extend into the village they are shown on Fig 23 of the reg 16 NP.</p> <p>Noted but not within the scope of the NP. This concern is being addressed at LPA level.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
16	16	The mix and design of housing in Larger Village Developments	2	0	7		
						Support for housing with gardens.	Believed to be adequately covered in HNP16.
						New developments need to attenuate their surface water [runoff].	Include this and the need for SuDS to be adopted in HNP16
						Need for [some] starter homes flagged.	Reflected in revised text of NP.
						Support for self build arrangements	Reflected in revised text of NP.
						Comment made that the text reads as if it has been taken from a detailed analysis of the village architecture. If there is a previous Village Design Guide or Conservation Area Appraisal then it should be included in the evidence base supporting the plan.	Some comments and suggestions on wording, but no objections. Wording around heights amended to reflect comments received. Policy remains substantially unchanged.
						Suggests the use of footpaths is discussed with the relevant highways authority, who did not comment on this matter. KHS seems to prefer to deal with proposals on a case by case basis.	
						Verify that the parking standard fits in with the Local Plan.	
						What is the justification for this maximum height? Is it supported by evidence so that it should apply in all cases throughout the plan area? And does it cover all uses, or simply new homes?	
						Suggestion to consider splitting two objectives of: good housing mix and ensuring a varied design approach.	

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
17	17	Micro Village Developments	0	0	5	<p>Comment made that the text reads as if it has been taken from a detailed analysis of the village architecture. If there is a previous Village Design Guide or Conservation Area Appraisal then it should be included in the evidence base supporting the plan.</p> <p>Suggests the use of footpaths is discussed with the relevant highways authority, who did not comment on this matter. KHS seems to prefer to deal with proposals on a case by case basis.</p> <p>Verify that the parking standard fits in with the Local Plan.</p> <p>What is the justification for this maximum height? Is it supported by evidence so that it should apply in all cases throughout the plan area? And does it cover all uses, or simply new homes?</p> <p>It is going to be difficult to argue how obtrusive a design is. Am not certain what an appropriate garden size would be for a particular size of home. The sight lines and access issues are probably dealt with by highways legislation.</p>	Some comments and suggestions on wording, but no objections. Wording around heights amended to reflect comments received. Policy remains substantially unchanged.

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
18	18	Promoting the role of Headcorn High Street	3	2	9		
						Comments are universally supportive of the role of the High Street as the centre of shopping for the village, with some comments foreshadowing a need for more shops in Headcorn whilst others express concern at the number of shop closures and the number of long term vacant premises on the High Street and suggest that an increase in housing may help bring more business into the High Street. Some suggestions that improved parking would help the popularity of the High Street for shopping.	General support for promotion of the High Street as the centre of shopping in the village and for initiatives to ensure that businesses survive and that any premises that become vacant are put back into commercial use as soon as is feasible.
						Not in conformance with MBC Strategic Policies, specifically HNP33 and saved policy ENV45 and HNP18 and saved policies R2, R10 and R11 HNP 33 is potentially not in conformity with ENV28	MBC commented that the use of certain limiting or restrictive wording in the policy in the first bullet point should be expanded to include business (B1) uses in addition to retail and they made representations in respect of the loss of retail units in the Conservation Area only and not over a wider area of the village. Amendments to the wording have been incorporated to take account of these representations by MBC. MBC further commented about the need for a hierarchy to allow edge of centre developments before those in the countryside. Having considered HPC felt that the village was too small for this approach to work and it was not needed on sustainability (car usage) grounds. HM Project 4 (previously project 1) Improving the frontage in the High Street and Wheeler Street was supported by the responses and is retained in the NP. Therefore issues and proposals will be identified and considered on a case by case basis.
						As worded not in conformity with MBC Saved Policy R2	

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
19	19	Promoting tourism in Headcorn	2	0	1		
						Expressions of support for the promotion of tourism in the area, centred around the village.	Comments supportive. Policy remains unchanged.

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20	20	Headcorn Aerodrome	2	0	3		
						Expressions of supports for the promotion of small business development in the parish. Tourism in the area and the Airfield are part of this.	Comments supportive. Policy remains unchanged.
						A location plan showing the Airfield would be helpful.	It is not feasible to show this on Headcorn maps due to resolution constraints. Postcode for Airfield has been added to assist in locating it.

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
21	21	Promoting key employment sites - Barradale Farm	0	0	4		
						Barradale Farm Business Park is adjacent to river Beult tributary. It floods in winter	Noted and will need to be addressed in any Planning Applications.
						Barradale Farm should be described as to its location and shown on Figure B.	It is not feasible to show this on Headcorn maps due to resolution constraints. Postcode for Business Site has been added to assist in locating it.
						Why is Barradale Farm the best site for expansion?	In respect of the supporting text to this Policy, note has been taken of the representations made by MBC by the addition of a new paragraph to this section confirming HPC's promoting of Barradale Farm Business Park as a strategic employment site within the Neighbourhood Plan. This is in line with Policy EMP 1 (4) of Maidstone Borough Council Draft Local Plan Regulation 18 Consultation version. Following representations, made some tidying of the wording in the supporting text to the Policy has been incorporated within reference to highway improvements and the recommendation for the Barradale and Stonestle Bbusiness Parks to share a new common access on to the A274. It has been made clear in the supporting text that what is required is for any layout to facilitate, and not block this as an option, not for Barradale's itself to provide access. MBC also queried was on protection on employment space. This has been addressed by adding to the policy on building in countryside to protect significant employment sites more generally from conversion to residential use.

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
22	22	Promoting employment sites - Stonestile Business Park	0	1	2		
						Objection to draft policy HNP22 expressed	Not a tenable position to adopt in NP
						Stonestile Business Park should be described as to its location and shown on Figure B.	It is not feasible to show this on Headcorn maps due to resolution constraints. Postcode for Business Site has been added to assist in locating it.
						Why is Stonestile Business Park suitable for expansion?	In respect of the supporting text to this Policy, note has been taken of the representations made by MBC by the addition of a new paragraph to this section confirming HPC's promoting of Stonestile Business Park as a strategic employment site within the Neighbourhood Plan. Following representations, made some tidying of the wording in the supporting text of the policy the Neighbourhood Plan has been incorporated within reference to highway improvements and the recommendation for the Barradale and Stonestile Bbusiness Parks to share a new common access on to the A274. It has been made clear in the supporting text that what is required is for any layout to facilitate, and not block this as an option, not for Barradale's itself to provide access. MBC also queried was on protection on employment space. This has been addressed by adding to the policy on building in countryside to protect significant employment sites more generally from conversion to residential use.

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
23	23	Supporting small business development	2	0	2		
						Support for tourism expressed	In line with draft NP & its policies.
						Encouragement expressed to keep High Street 'occupied'	In line with draft NP & its policies. It is anticipated that the (re-) vitalisation of the High Street Project now included on the NP will also address this issue.

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
24	24	Priorities for improving road safety in Headcorn village	18	0	17	<p>Suggestion that Policy HNP15 should be recast to highlight current plans to apply appropriate highway design to ensure highway and pedestrian safety on an local to developments and, where appropriate mitigate effects by offsite works, specifically recognising current plans to provide footpath on Oak Lane, improvements to Lenham Road and to the Wheeler Street/Oak Lane junction.</p> <p>Traffic calming should be in place in Millbank. No traffic lights Kings Rd/Moat Rd. Mini roundabout possibly</p> <p>Specific mention of the need for road re-alignment at Wheeler Street and Smarden Road junction.</p> <p>Comment raises the question as to whether public transport is given sufficient attention in the Reg 14 NP</p> <p>Improvements for pedestrians and drivers recommended in Mill Bank.</p> <p>Provide speed cameras on A274 at both ends of the village</p> <p>Provide better connecting throughways for pedestrians throughout village</p> <p>A controlled growth in housing is needed, that will support Headcorn being a compact, attractive village which has good paths &amp; lighting to ensure locals can work &amp; access all amenities on foot &amp; cycle, building on its community spirit, safety and happiness.</p> <p>Concern over traffic speed in side roads. Grigg Lane specifically mentioned.</p> <p>Provide footpath along Oak Lane</p> <p>Concern over traffic speed on Maidstone Road [extend 30mph limit on A274 northwards]</p> <p>Move traffic calming on entrance to village from North on A274. [Extend 30mph speed limit further north or put traffic calming measures on A274 north of village?]</p> <p>Some form of traffic control/calming is required on Mill Bank /at the White Horse Cross Roads. A mini roundabout would be far more beneficial due to free flowing traffic and less expensive [than traffic lights].</p> <p>Concern over increases in traffic ingress/egress in Ulcombe Road &amp; Kings Road, suggesting need for roundabouts at junctions at White Horse &amp; Kings/Lenham/Ulcombe Road</p> <p>Speed on Ulcombe and Tilden Road specifically mentioned as a concern.</p> <p>Install reactive traffic speed indicators on A274 on entries to village.</p> <p>Speeding is mentioned as a concern with specific reference to Smarden Road and the possibility of providing a cycle lane.</p> <p>Provide footpath in Oak Lane.</p> <p>Improved speed limit zones and the enforcement of traffic speed sought</p> <p>Consider providing a through or round village cycle route so that people can cycle to the shops without risking riding along the A274</p> <p>Concern expressed over traffic congestion throughout the village, with the White Horse cross roads specially mentioned as needing improvement.</p> <p>Promote greater restrictions on on-road parking and improved through ways for pedestrians</p>	<p>A significant number of comments were received from residents regarding concerns over road safety and these were all effectively supportive of the policy. However to further strengthen the application of this policy, the project HM Project 5 - Improving Road Safety, has been added to the Plan to and provides for a mechanism to identify address specific problem areas.</p>



Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
25	25	Provision of parking in Headcorn village	14	0	7	<p>Plea for better parking arrangements in the village.</p> <p>Headcorn is a rare example of a country village with a thriving high street. Headcorn could well lose, or all, of their shops. This could well still occur in Headcorn and it could happen very quickly. Given that 75% of villagers listed the vibrant High Street as important, yet there is nothing in the plan about this possibility. If it is not a possibility, then the plan should explain why this is the case.</p> <p>Specific mention of the greater use of double yellow lines [implicitly parking controls] and the adequacy of parking at The Hardwicks and the Surgery</p> <p>Greater controls of, and enforcement of, commuter parking in village. Oak Lane mentioned specifically.</p> <p>It would be helpful if the streets with commuter parking issues were highlighted perhaps?</p>	<p>A significant number of comments were received from residents regarding parking and as a result this policy has been split to separate planning issues from the project aspects of this policy. HM Project 6 - Improving parking in Headcorn Village, has been added to the Plan in order that various initiatives in this area can be pursued without the need to link them to a particular development.</p> <p>A good idea in principle but not very informative as all side roads adjacent to the A274 in the village suffer from commuter parking.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
26	26	Provision of broadband in Headcorn	1	0	3	<p>Support expressed for Policy that encourages provision of Broadband throughout the village.</p> <p>Wealden Homes commented that Policy HNP26 can only be put in place on the basis that the Broadband service is available in Headcorn.</p> <p>Wealden Homes questioned the position regarding Broadband service for the village. It is led to understand that it's being provided and being installed.</p>	<p>Support noted.</p> <p>Some queries were received from developers on what this means for them. The Plan has been clarified so as to make clear that the aim is to future proof development, and this has been made clearer in supporting text. Recent government policy on promoting productivity in rural areas prioritizes provision of broadband. Policy remains unchanged.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
27	Deleted	Upgrading the recreational facilities for teenagers and young adults	1	0	4	<p>More decent sized open areas/parkland woods needed for walking &amp; leisure, particularly to the east of the village.</p> <p>Consider land south of the railway for additional recreational space.</p> <p>Consider putting more communal facilities near Long Meadow Hall</p> <p>A Neighbourhood Plan needs to consider where we are as a community in terms of interacting with other communities in respect of leisure, health, sport/play, education etc What are the plans for a south Maidstone Leisure and Pleasure facility with good play and sport for young and old, a secondary school and better roads or accessibility?</p> <p>Promote some positive policies to enhance some of these open spaces and facilities.</p> <p>The NP should promote positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision. It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 of the NPPF. It is also important that the NP complies with the need to protect playing fields and the presumption against the loss of playing fields, as set out in national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'.</p>	<p>The promotion of upgrading recreational facilities for teenagers and young adults is to be treated by HPC as a project (HM 1) supporting HMP4 within the NP going forward and will no longer be addressed specifically as a separate Policy within the NP. The implications of HNP15 will be address in this project to ensure to ensure it links in to a plan for safe interconnectivity within and throughout the the village (including those for pedestrians and cyclists) and that this includes access to recreational spaces - both existing and any planned.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
28	Deleted	Creation of a wildlife sanctuary with access to the River Beult	5	0	3	<p>More decent sized open areas/parkland woods needed for walking &amp; leisure, particularly east of the village.</p> <p>Support for habitat corridors/ sanctuaries/ nature reserves.</p> <p>Consider land south of the railway for additional recreational space.</p> <p>EA would like HPC to indicate [in the NP] that it will work with Natural England, the Environment Agency and other landowners to maintain and improve the condition of the River Beult. It is currently regarded as "unfavourable" and an agreed plan is required for physical restoration that complements the work taking place to improve water quality.</p> <p>A plan of the existing footpaths in the village as an appendix would be helpful. Further, the location of the land to be acquired next to the Beult would be helpful.</p>	<p>The promotion of a wildlife sanctuary with access to the River Beult is to be treated by HPC as a project (HM2) supporting HMP4 within the NP going forward and will no longer be addressed specifically as a separate Policy within the NP. The implications of HNP15 will be address in this project to ensure there are links to a plan for safe interconnectivity within and throughout the the village (including those for pedestrians and cyclists) and between the village and the countryside (for recreational walkers).</p> <p>HPC confirms that it will work with Natural England, the Environment Agency and other landowners to maintain and improve the condition of the River Beult as part of the above project HM2 to ensure that any works, specifically physical restoration work, complements the work taking place to improve water quality.</p> <p>Maps of existng public rights of way/footpaths throughout the parish are available from MBC. Scale prevents them from being usefully reproduced in the NP. However, where these paths extend into the village they are shown on Fig 23 of the reg 16 NP.</p>

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
29	27	Sewerage provision in developments in Headcorn village	15	1	7		
						Explicit support for the statement that the village infrastructure to be extended ahead of further housing development, with specific mention of the primary school, the sewage system and (less frequently) the GP facilities.	This concern is reflected in HNPs 11, 27 & 30 of the Reg 16 NP.
						A number of developers object to the approach taken in the NP that requires developer contributions towards improvements to the local sewerage network and expansion of the local primary school, is not correct and that it is the responsibility of the sewerage undertaker and the Local Education Authority respectively to manage capacity of these facilities, and the belief that Southern Water, through the LPA, will not allow building to proceed notwithstanding that planning permission has been granted, unless the sewage system has the necessary capacity.	HPC recognises that developers do not have to 'make good' legacy deficiencies but is of the view that the purpose of bi-lateral and S106 Agreements is to ensure that developers contribute proportionately to the future cost of the infrastructure accommodating the impact of their developments. To include the specific areas of focus in the NP is therefore logical and appropriate. Furthermore HPC contends that recent experience demonstrates that the present planning protocols are not working in that housing is being built despite the evident fact that the sewage system is currently overloaded at times of heavy rainfall. HPC therefore has not changed Policies 11, 27 & 30 in the Reg 16 NP.
						EA noted that improving Headcorn WWTW's capacity and ability to deal with high flows via the waste and storm system will help improve the water quality in the river Beult. Reducing point source ammonia & phosphate levels from the WWTW is required to help reach the stringent water framework directive standards.	EA's comment is noted but HPC sees this requirement covered by the general requirement that the sewage system manager provides a system that performs to accepted industry performance standards that can handle the needs of the housing approved for Headcorn.
						Southern Water comments that it acknowledges there to be significant infrastructure constraints facing Headcorn, particularly with the sewerage network, which is adversely Southern Water furthermore highlights that it has undertaken various measures to address flooding concerns, including: <ul style="list-style-type: none"> <li>• A programme of sewer jetting (cleaning with a jet of high-pressure water), carried out every six months to ensure the system is working as effectively as possible.</li> <li>• Installing non-return valves in properties (NRVs) to prevent wastewater coming back up the sewer and causing flooding, for example, due to a blockage in the sewer caused by wet wipes or a build up of fat, oil and grease.</li> <li>• The refurbishment of Moat Road Wastewater Pumping Station to improve its operational performance and ensure wastewater from local homes and businesses is being removed effectively.</li> </ul> Southern Water affected by surface water inundation during times of heavy rain. Southern Water further highlights in its representation that it has been working with the Lead Local Flood Authority (Kent County Council) to progress a Surface Water Management Plan (SWMP) for the area, after which Southern Water will be undertaking a Drainage Area Plan (DAP) of the Headcorn catchment which is expected to complete in Spring 2016. The DAP will determine investment requirements which will be prioritised against other investment needs and decisions.	HPC is concerned over the time needed to effect any identified improvements to the sewage system, assurance that the necessary budgets will be prioritised and authorised and the works committed in a timely manner. HPC is also concerned over the demonstrable failure of the planning consents protocols that allow further housing to be built without the infrastructure being upgraded. Accordingly, HPC is making no changes of substance or intent to the relevant policies in the reg 14 NP.
						Southern Water proposed amendments to policy HNP11 and its supporting text, that would make policy HNP29 and its supporting text redundant and therefore should be deleted and, to ensure consistency with the wording of the NPPF and other government guidance and facilitate sustainable development, that an additional policy be included in the NP: 'New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan.'	

Rev 14 Policy Number	Rev 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
30	28	Commercial energy generation in Headcorn	0	0	2		
						Are the criteria of a 5ha areal size limit for a solar pv farm and a distance of 0.85km minimum distance of any solar farm from the nearest dwelling other than one owned by the developer are applicable/acceptable for all schemes?	In the absence of any generally accepted standards or criteria on intrusiveness or dominance of landscape or visual impact, these metrics will be retained in this policy as their proxies.
						Bullet point in recital to HNP should read 'large solar farms are visually intrusive if poorly sited in the landscape.'	Noted. The proposed additional wording is implicit and will not be included in the reg 16 NP.

Rev 14 Policy Number	Rev 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
31	29	Promoting energy and water efficiency	0	0	3		
						Consider trying to do deal whereby Headcorn residents and community benefit from local green energy schemes.	This cannot be codified in a Policy but it will be explored by HPC when considering individual Planning Applications.
						EA states that all new residential dwellings should be designed to achieve a maximum water use of 105 litres per person per day. EA also recommend that non-residential developments achieve BREEAM "excellent" for water efficiency.	Included in the revised Policy wording of the Reg 16 NP.
						As expressed the Policy is more of an aspiration than a planning policy - and its requirements may effectively be covered by the Building Regulations.	HPC notes this comment but will retain the wording in the Reg 14 NP.

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
32	30	Priorities for infrastructure spending in Headcorn	21	2	24		
						Explicit support for the statement that the village infrastructure to be extended ahead of futher housing development, with specific mention of the primary school, the sewage system and (less frequently) the GP facilities.	This concern is reflected in HNPs 11, 27 & 30 of the Reg 16 NP.
						DHA Planning opines that the NP does not contribute to the achievement of sustainable development in that Headcorn NP Policies [create] Barriers to Development - sewage. The Water Act requires the provision of sewerage by the Company to meet demand and the process for this involves the engagement of applicants for planning permission with the services company. With there being no grant of planning permission under this draft policy, there will be no demand for the Water Company to take into account. Thus both investment in infrastructure and development will be prevented by the policy. This is contrary to government NPPF policy as it prevents coordination of development with infrastructure (para 7), prevents the meeting of the development needs of the area (Paras 14 and 15), does not plan positively to support local development (Para 16), drive and support sustainable economic development (Para 17) or support any aspect of government policy on the delivery of a wide choice of high quality homes (para 47) and would act to constrain the LPA's own ability to support that policy.	HPC recognises that developers do not have to 'make good' legacy deficiencies but is of the view that the purpose of bi-lateral and S106 Agreements is to ensure that developers contribute proportionately to the future cost of the infrastructure accomodating the impact of their developments. To include the specific areas of focus in the NP is therefore logical and appropriate. Futhermore HPC contends that recent experience demonstrates that the present planning protocols are not working in that housing is being built despite the evident fact that the sewage system is currently overloaded at times of heavy rainfall. There has been some 203 (=96+107) houses added since 1/4/2009 with no sewage system upgrade even though there were problems known before that date. HPC therefore has not changed Policies 11, 27 & 30 in the Reg 16 NP.
						Gladman opines that the approach taken in HNP11 (and HNPs 29 & 32), requiring developer contributions towards improvements to the local sewerage network and expansion of the local primary school, is not correct and that it is the responsibility of the sewerage undertaker and the Local Education Authority respectively to manage capacity of these facilities.	
						Wealden Homes opines that HPC is wrong to say that new housing development will exacerbate the existing problems associated with the foul drainage system. New development has to provide infrastructure to ensure that a 'nil detriment' position is achieved and often this brings about improvements as larger pipework increases storage capacity.	Wealden Homes is wrong in fact as additional housing without an commensurate upgrade in the sewage system must negatively impact the performance of the present system. Wealden is correct in its assertion that e a developer has only to mave a 'nil detriment' to the present system. The NP does not require legacy problems to be rectified by future developers. Refer to the previous commentary, above, for HPC's position on this matter.
						DHAP opines that the NP does not contribute to the achievement of sustainable development in that Headcorn NP Policies [create] Barriers to Development – school expansion and also states that a legally binding agreement has been entered into providing for sufficient land behind the current school to be allocated for future school expansion as part of the Planning Application for site H1 (39), in order to secure the future of Headcorn Primary School in its current position. The school expansion site has already been identified and agreed with Kent County Council, as has the method of delivery in the form of a residential development of the associated land and a S106 Agreement for the delivery of the expansion site, which at the time of making these representations is in agreed legal form. However the NP, through HP11 (part 1) prevents its release for school use. Development is effectively prevented by the NP. As the expansion site is farmland, without development there is no incentive for it to be released and a development on site HO-70 is undeliverable.	These statements are not valid for the HNP as a whole. They are merely an objection to the plan because it is not in accord with a planning application that at the time of publishing the Reg 14 was underfoot. This site was proposed as a standalone site (HO-70) by MBC in its SHLAA.
						In its current form HNP will deny the ability of the plan to meet the needs of the population, specifically inhibiting the delivery of housing to meet the objectively assessed need. Under Policy HNP12 the NP proposes the allocation of a part of the land known as site HO-70A, land off Kings Road is shown as having an indicative capacity of 50-100 units. The site is critical to the delivery of the NP as it is required to provide the expansion land for Headcorn Primary School referred to. Consequently in its present form the allocation is undeliverable, making both a major potential component of the NP housing supply and the school expansion, with its new access from Ulcombe Road, undeliverable.	
						The expansion of Headcorn Primary School will require developer funding for the construction and land acquisition costs of the County Council's intended move from 1 Form Entry (FE) to 2 FE. As a 1 FE school Headcorn is already oversubscribed.	HPC is of the view that the purpose of bi-lateral and S106 Agreements is to ensure that developers contribute proportionately to the future cost of the infrastructure accomodating the impact of their developments. To include the specific areas of focus in the NP - such as the expansion of the primary school in its present location - is therefore logical and appropriate.
						Wealden Homesa states that it considers the NP is weak in describing existing local infrastructure and planned improvements, specifically not recognising Wealden Homes plans to provide footpath on Oak Lane, improvements to Lenham Road and to the Wheeler Street/Oak Lane junction.	Wealden Homes' comments are noted but HPC does not consider it appropriate to include imminent infrastructure improvements of the type indicated by Wealden Homes in a NP. These are recomised in Planning Consent-related documents.

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
33	31	Policy for for building new dwellings in the countryside	2	1	5		
						[Building in the] Countryside policy seems unduly restrictive. There is no real reason why Headcorn should be need more restrictive policy than the national policy. Only allowing annexes & extensions will make it hard for families to benefit, because it is insufficiently versatile.	This policy been amended and clarified in accordance with the direction of the NPPF to make it clear what development is not permissible in the countryside surrounding the village. The policy was also updated policy to remove the references to mention of extensions and annexes, reflecting comments received. The policy is now explicitly aligned to NPPF in terms of what will be permitted.
						General concern expressed over building on farmland.	This policy, which is built upon the NPPF and saved MBC Policies, is intended to address his concern.
						No more housing needed, especially not in the countryside	An NP that specifies no further development on green fields would not be in compliance with the legislation.
						Now that the village envelope has been broken the revised boundary should be re-set to prevent more properties sprawling into the countryside	HPC will raise this with MBC, which sets the Village Boundary once the NP has been 'made'.
						MBC commented that this policy for building new dwellings in the countryside appears to restrict new development to an extension of an existing property or reusing a redundant building but that the explanatory text appears to indicate potential additional dwellings of the types allowed in the countryside through the NPPF and, in addition, by dividing an existing large house into two. There is also reference in the policy to any new house building being limited to one unit and the justification of need – which would not generally apply to extensions or conversions. It is unclear how this policy will work and therefore whether it is in compliance with MBC Saved Policy Policy ENV28. Clearer explanation and policy wording may resolve this potential non-conformity with the adopted Local Plan. Policy HNP33 would permit a new dwelling in the countryside through the reuse of a redundant, permanent building. As drafted, Policy HNP33 would not be in general conformity with strategic adopted policy ENV45 as it does not prioritise business proposals ahead of residential conversions and is more restrictive in the type of buildings which would be accepted for conversion to residential use (must be redundant).	This policy has been amended and clarified in accordance with policy ENV28 of the Maidstone Local Plan. The policy is now explicitly aligned to NPPF in terms of what will be permitted. A provision preventing conversion of buildings that are used for significant employment provision has been added following comments from MBC. The wording of the policy that any conversions should be of redundant buildings, effectively did this anyway, and is within the policy wording to try and avoid a proliferation of buildings within the countryside. The comment by Maidstone BC encouraging economic development over residential development in the countryside is reflected in a modification of this policy, which does not allow loss of an active economic use to residential use. In terms of encouraging the conversion of buildings for employment rather than residential use, conversion for business use is supported by the policies in Section 6 of Headcorn's NP (especially HNP19 on tourism and HNP23 on small business development), in line with Section 3 of the NPPF. However, it was felt unhelpful to require landowners to prioritise business development and such a requirement could not be justified under sustainability considerations.

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
34	32	Planning Permission for agricultural exception sites	2	0	2		
						Specific concern over building on farmland.	Comment consistent with thinking within draft NP & its policies - and is reflected in HNP 31
						Concern expressed about the practicality of implementing and enforcing this policy.	Comment noted but Policy remains unchanged.

Reg 14 Policy Number	Reg16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
35	33	Limits on planning permission for gypsy and traveller pitches	12	16	1		
						Policy is not restrictive enough in respect of site size. Gypsy & Traveller sites should be dispersed around parish.	Consider comment when reviewing HNP35
						Concern over lack of enforcement of planning laws to unapproved gypsy & traveller sites. Explicit statement for no more gypsies and traveller sites in Headcorn.	A policy of having no [further] gypsy & traveller sites in the NP is not tenable. Planning enforcement issue in respect of unlawful gypsy & traveller sites
						Explicit and implicit comments that no further gypsy and traveller sites wanted and there is no enforcement on illegal sites.	50% of respondents supported a smaller number of additional pitches. Analysing comments from respondents requesting less pitches reveals a high number supporting a zero increase in pitches. This is not a tenable position for the plan as the plan supports controlled increase in all forms of residential development whilst respecting the rural setting of Headcorn and its sense of being a village. In addition, there were many negative comments regarding traveller sites relate to lack of planning enforcement and fairness in the planning system which is perceived to be too much in favour of gypsy and travellers. HPC notes that at the core of the new DCLG planning policy for traveller sites is an overarching aim to ensure fairness and equal treatment of travellers whilst respecting the interests of the settled community. Ulcombe PC is supportive of the approach in the Plan. MBC is concerned that the policies will restrict the size of future pitches. Regarding size, HPC considers this is adequately dealt with in the proposed gypsy and traveller policies and the wider plan which recognises what the scale of future development in Headcorn should follow. Definition of a 'gypsy' and a 'traveller' has been updated in line with new government guidance and definition of a 'pitch' added to the policy to reflect this. HPC felt that some management of overall numbers was appropriate and that this policy framework provided the best option. Although there would be support for reducing the number allowed, it was felt on balance that this would be unhelpful. HPC noted that MBC had consulted on an additional site in the Parish in its recent (October 2015) Reg 18 Local Plan consultation. Whether to allocate this site was discussed, but on balance it was felt the site could come forward under the policy without a specific allocation and, given the site had not been included in the Reg 14 consultation on Headcorn's Neighbourhood Plan, it was decided it was better on balance to omit the site. More information on how the experience in Headcorn compares to both the Maidstone Borough and national experience has been added as context. The concern over planning enforcement in respect of unlawful gypsy & traveller sites will be forwarded to MBC.
						Limit gypsy pitches to 3 and also a limit to amount of caravans per site	In line with draft NP & its policies

Reg 14 Policy Number	Reg 16 Policy Number	Policy Title	No. of responses in Support	No. of responses Objecting	No. of Comments/ Observations	Main Issues and concerns raised by respondents	Headcorn PC Responses
36	34	Planning permission for gypsy and traveller pitches	18	0	0	Overwhelming support for the policy from respondents with specific expressions of concern over lack of enforcement of planning laws to unapproved gypsy & traveller sites.	Planning enforcement issue in respect of unlawful gypsy & traveller sites is noted and MBC will be so advised. The need to ensure sites with temporary permission will be restored to their original state was recognised and included in this policy.