

# **Maidstone Borough Local Plan Examination Session 1A: Legal & Procedural Matters – Response by Headcorn Parish Council, September 2016**

- 1) Headcorn Parish Council is the elected body that represents the residents of Headcorn Parish. Headcorn Parish is a designated Neighbourhood Plan Area, and Maidstone Borough Council has assigned it Rural Service Centre status. The views expressed in this consultation response have been informed by the evidence gathered to underpin Headcorn's Neighbourhood Plan. Headcorn's Neighbourhood Plan is at an advanced stage, having completed its Regulation 16 Consultation on February 26, 2016 and is now at examination. Completion of the examination has been delayed, as the original examiner for Headcorn's Neighbourhood Plan was forced to withdraw, having lost her accreditation. Therefore, Headcorn's Neighbourhood Plan had to be sent to a second examiner, and the examination expected to be completed by the end of October 2016. Headcorn's Neighbourhood Plan enjoys considerable local support, with 93.9% of respondents for the Regulation 14 consultation supporting the draft Plan and similar support expressed at Regulation 16 Consultation. Therefore the views expressed in this consultation response about Headcorn's development should be seen as representative of the overall needs and priorities of the people and businesses within Headcorn Parish.

## **I. Overview**

- 2) Headcorn Parish Council

**Qn.1.2. As part of DtC engagement have Sevenoaks or Tunbridge Wells Councils in west Kent indicated to MBC how they might address a housing needs assessment if they are not capable of being accommodated within their own areas due to Green Belt and other constraints?**

- 3) Headcorn Parish Council does not intend to comment on this issue.

**Qn.1.3. Would under-provision of housing in west Kent be likely to affect the geography of housing market areas? In particular, would those unable to be accommodated locally (including London Commuters) seek to live in other areas (including Maidstone) with knock on consequences for their own residents (such as the possible displacement of unmet demand towards Ashford)?**

- 4) Headcorn Parish Council considers that it is too early to anticipate under-provision of housing in west Kent. Headcorn Parish Council notes that ONS projections of household numbers for 2021 in Sevenoaks, Tonbridge and Malling and Tunbridge Wells fell both between the 2011-based and 2012-based housing projections and between the 2012-based and 2014-based housing projections. These falls will make it easier for these Boroughs to meet any demand locally.

- 5) In total comparing the 2011-based and 2014-based household projections the number of households expected in 2021 has fallen -0.6% in Sevenoaks, -3.2% in Tonbridge and Malling and -3.2% in Tunbridge Wells. On the same basis the number of households expected in Maidstone in 2021 has fallen -1.5%. Indeed, Headcorn Parish Council notes that between the 2012-based projections (issued in 2015) and the 2014-based projections (issued in 2016), the projected number of households in 2031 for Sevenoaks, Tonbridge and Malling and Tunbridge Wells combined has declined by almost 3,000 household - a fall of 2% compared to the number of households in 2014 (the year on which the projections were based).
- 6) While Headcorn Parish Council remains sceptical that the ONS numbers on their own can be used to determine need, the fact that this measure of housing demand in west Kent has been declining with each iteration of the household projections suggests that it would be premature to allocate additional housing at this point. Headcorn Parish Council notes that the advantage of the ONS projections is that they are internally consistent and that the projected number of households in Maidstone is also lower when compared to the 2011-based household projections.
- 7) Headcorn Parish Council notes that journey times from stations in Maidstone Borough into London compare poorly compared to journey times from west Kent Boroughs. Only West Maidstone station offers a journey time of under one hour to reach its London terminus, with the fastest train arriving between 8am and 9am on a weekday taking 53 minutes to reach London St Pancras. All other train stations in Maidstone Borough take at least one hour to reach their London terminus and in many cases significantly longer. For example, the fastest train from Marden, which is the station closest to London on the line also serving Staplehurst and Headcorn, takes 60 to reach London Cannon Street for trains arriving between 8am and 9am. In contrast, the fastest train from Sevenoaks takes 32 minutes into London Cannon Street to arrive between 8am and 9am, with trains from Tonbridge taking 45 minutes and trains from Tunbridge Wells 55 minutes.
- 8) Headcorn Parish Council notes that trains from Ashford International take between 38 and 36 minutes to reach London St Pancras during the 8am to 9am slot. This would make Ashford a better substitute than Maidstone Borough for those looking to commute to London. Headcorn Parish Council notes that trains from Ebbsfleet are even faster. This makes it unlikely that demand from London commuters will displace local demand for housing in Maidstone.
- 9) In addition, Headcorn Parish Council notes that developments such as Crossrail are likely to have a significant impact on housing demand from those looking to move out of London and commute in to work. Crossrail will offer direct journeys into central London from destinations and even from the stations furthest from London (Reading and Shenfield) direct journeys into Bond Street will take less than an hour. Any expectation, therefore, that current patterns of housing demand from those looking to move out of London will remain unchanged seems unlikely.
- 10) Headcorn Parish Council therefore considers that anticipating that there will be unmet demand from either west Kent, or London, and assuming that Maidstone Borough would be well placed to meet it is extremely premature.

**Qn.1.4. As the west Kent Local Plans remain at an early stage without defined housing targets, should this issue lead to a request to accommodate additional housing can it be left to the first review of the Maidstone Borough Local Plan?**

- 11) Headcorn Parish Council considers that it would be premature to allocate additional housing to Maidstone Borough without evidence to establish its need. Headcorn Parish Council notes that in examinations of Local Plans elsewhere Inspectors have rejected the need to add additional housing to a Borough's total in order to accommodate a potential future need elsewhere (for example from London) when that need had not yet been properly established. Headcorn Parish Council therefore considers that it would be appropriate to wait until the first review of Maidstone Borough Council's Local Plan before allocating any additional housing.

**Qn.1.5.**

- 12) There is no question 1.5.

**Qn.1.6. Has MBC sought information from the adjoining Boroughs as to their own employment land supply positions?**

- 13) Headcorn Parish Council does not intend to comment on this issue.

**Qn.1.7. Does transport infrastructure qualify as a cross border strategic matter?**

- 14) Headcorn Parish Council considers that transport infrastructure should qualify as a cross border strategic issue. Maidstone Borough is not an island and Maidstone town itself sits on the boundary of the Borough, close to another large development. Clearly, therefore, a lack of joined up thinking could lead to detrimental consequences.

**Qn.1.8. Does lack of agreement to date between MBC and KCC (and HE) on some transport issues qualify as a failure in the duty to cooperate given the history of engagement set out in the DtC Compliance Statement?**

- 15) Headcorn Parish Council does not intend to comment on this issue.

**Qn.1.9. Has there been cross border co-operation in the review of such designations?**

- 16) Headcorn Parish Council does not intend to comment on this issue.

**Qn.1.10. Would the Council please respond to the CPRE representations concerning consultation with parish councils?**

- 17) Headcorn Parish Council would like to support the concerns raised by the CPRE on the consultations with Neighbourhood Plan groups for the reasons set out in Section VII.c. of its Regulation 19 submission. It considers that Maidstone's approach to allocating sites has been overly prescriptive in a way that is

incompatible with national policy. Headcorn Parish Council notes that there is a distinct contrast between the mindset evident in Maidstone Borough and the neighbouring Borough of Ashford. In Ashford's emerging Local Plan, the approach to site allocation is described as:

*"Where Neighbourhood Plan Areas had been established early on in the preparation of this Local Plan, proposals to allocate sites within these areas fall to the neighbourhood plan, where they are non-strategic in nature."*

- 18) This is a sharp contrast to the approach taken by Maidstone. Despite the fact that Headcorn Parish Council launched its Neighbourhood Plan work in 2012 and the parish was designated as a Neighbourhood Plan area in April 2013, rather than consult on what the community wants or needs, Maidstone's approach has simply been to announce what it intended to do. Headcorn Parish Council considers that this cannot be excused by an assertion that the allocated sites are strategic, as this is incompatible with the fact that two of the sites allocated in Headcorn are for fewer than 10 houses.
- 19) Headcorn Parish Council notes that timing issues linked to when Neighbourhood Plans are likely to be adopted as part of the Development Plan for Maidstone will also create problems. Neighbourhood Plans, adopted before the Local Plan is finalised, risk having Neighbourhood Plan policies overwritten by generic Borough-wide policies. Headcorn Parish Council considers that in order to be judged as sound (in the sense of compatible with national policy) this issue needs to be addressed within the Local Plan. This could be done either through a generic policy stating that (where they exist) Neighbourhood Plan policies will take precedence over the Borough-wide set out in the Local Plan; or by amending the policy wording in specific policies.

**Qn.1.11. Are the Ordnance Survey based inset maps in the Local Plan part of the Policies Map or the Key Diagram or neither?**

- 20) Headcorn Parish Council does not intend to comment on this issue.

**Qn.1.12. Should Policy H2 (Broad Locations) be included on a key diagram or is it a policy with a geographic application which should be illustrated on the Policies Map?**

- 21) Headcorn Parish Council does not intend to comment on this issue.

**Qn.1.13. Do all the other local plan policies with a geographic application state that that they are so illustrated on the Policies Map?**

- 22) Headcorn Parish Council does not intend to comment on this issue.

**Qn.1.14. Has the preparation of the Local Plan had regard to the current Local Transport Plan 3?**

- 23) Headcorn Parish Council does not intend to comment on this issue.

**Qn.1.15. What regard should be had to the emerging Local Transport Plan 4 which is expected to be adopted after the examination hearings but before the submission of the Inspector's Report?**

24) Headcorn Parish Council does not intend to comment on this issue.

**Contact details**

All queries on this consultation response should be addressed either to:

- A. Caroline Carmichael, Headcorn Parish Clerk, Parish Office, Headcorn Village Hall, Headcorn (Email: [headcornparishclerk@gmail.com](mailto:headcornparishclerk@gmail.com)) ; or
- B. Dr Rebecca Driver, Analytically Driven Ltd, Great Love Farm, Love Lane, Headcorn (Email: [rebecca.driver@analytically-driven.com](mailto:rebecca.driver@analytically-driven.com)).

Dr Driver is a member of the Headcorn Matters Neighbourhood Plan team and prepared this consultation response on behalf of Headcorn Parish Council, with support from the wider Headcorn Matters Neighbourhood Plan team.