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## Growth and Communities

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### BY EMAIL ONLY

Dear Stefan,

### Re: Headcorn Parish Neighbourhood Plan (2022-2038) - Regulation 14 Consultation

Thank you for consulting Kent County Council (the County Council) on the Headcorn Parish Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the draft Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

### **2. Setting the Scene – Headcorn Parish**

Public Rights of Way (PRoW): In respect of paragraph 2.1, the County Council is disappointed with the omission of the PRoW network and its important place in the landscape of the parish. Significant visual connectivity is provided by the PRoW network and it is requested that the importance of this asset is specifically referenced.

#### *2.ii The history of Headcorn*

Heritage Conservation: Although there are few archaeological discoveries from Headcorn dating earlier than the medieval period, such discoveries are not unknown. Several prehistoric artefacts, in the form of stone or bronze axes and axe heads, and iron age coins, have been found in the parish. In addition, a mid to late bronze age vessel in a pit was discovered at Ulcombe Road in 2018 together with late iron age and Roman features, and a late iron age / Roman farmstead may have been found at Little New House Farm.

Many of these discoveries, together with a wider review of the heritage and potential of Headcorn village, can be found in a [historic town survey](#) prepared by the County Council. It is recommended that the findings of this survey are reflected within the draft Neighbourhood Plan.

The draft Neighbourhood Plan then reviews the built environment of the village, however, it should be noted that all these sites, as well as others now lost, will have left an archaeological heritage that could be revealed either by research or during development. This archaeological heritage is also part of the wider heritage of the Neighbourhood Plan area, and should therefore be referenced in the document.

### *2.ii.a The history of the built environment*

Heritage Conservation: The County Council recognises that the text only partially reviews Headcorn's built environment. Although some key heritage assets in the village centre are identified, there are many others that deserve mention. There are at least five medieval moated sites listed in the [Historic Environment Record](#), including the important site of Moatenden Priory. These sites are characteristic of the Low Weald and many of the issues of setting and conservation identified in the draft Neighbourhood Plan apply to them. It would be helpful to see these identified within the Neighbourhood Plan as a site type of particular interest for the local community and worthy of conservation. There are also approximately 70 historic farmsteads (identified as present on the 2<sup>nd</sup> edition Ordnance Survey map 1897-1900), which should also be mentioned in the document.

## **3. Vision For Headcorn's Neighbourhood Plan**

PRoW: As a general statement, the County Council, in respect of PRoW, is keen to ensure that its interests are represented within the local policy frameworks of the parishes in Kent. The County Council is committed to working in partnership with parish councils to achieve the aims contained within its [Rights of Way Improvement Plan](#) (ROWIP). This aims to provide a high-quality PRoW network, which will support the Kent economy, provide sustainable travel choices, encourage active lifestyles and contribute to making Kent a great place to live, work and visit.

The County Council is disappointed with the omission of the PRoW network within the draft Neighbourhood Plan, due to the benefits and opportunities the network offers. Headcorn Parish Council is strongly urged to reference the ROWIP within the draft Neighbourhood Plan as this will enable successful partnership working to continue and deliver improvements to the PRoW network in Headcorn. Joint delivery of the ROWIP will ensure significant benefits and potentially provide access to additional funding opportunities.

The County Council strongly advises the inclusion of the PRoW network within Objectives three, four and five, as it provides important access and connectivity. It also reflects the extent to which the PRoW network meets the likely future public need in contributing towards more sustainable development. It is also recommended that policies HNP Policy 3: Connectivity and Access and NHP Policy 4: Infrastructure Provision include reference to the PRoW network.

### *3.i.a Creating policy objectives to support the Vision*

PRoW: It is advised that the Objectives of this draft Neighbourhood Plan have specific reference to the PRoW network and the role of the ROWIP. The PRoW network is a valuable resource that provides significant opportunities in respect of health and well-being, tourism and sustainable transport. The ROWIP can help contribute towards a robust infrastructure that enables development and encourages economic growth.

## **5. Headcorn Design Guidance**

### *5.v Street scape – maintaining Headcorn’s sense of place*

Highways and Transportation: The County Council, as Local Highway Authority, notes that the design of new roads, including the width, layout, materials and street furniture, will need to achieve conformity with the adopted Kent Design Guide (2005). This will ensure that they are suitable for adoption by the County Council as publicly maintainable highway.

### *5.vi.a Parking*

Highways and Transportation: The County Council recommends that the guidance in this section draws attention to the need for development layouts to accommodate the parking needs of cyclists, motorcyclists and the mobility impaired, as part of the overall parking provision.

### *HNP Policy 3: Connectivity and access*

Highways and Transportation: The requirement for self-contained development in criterion 5 appears to conflict with the emphasis placed on connectivity in criterion 1. The County Council recommends that the policy encourages layouts that create permeable neighbourhoods to minimise walking/cycling distances. This policy should also emphasise the importance of achieving direct and convenient access to public transport services, to allow sustainable transport use by residents and visitors.

In respect of criterion 7, it should be noted that the vehicular access arrangements for new development should achieve conformity with the adopted Kent Design Guide (2005).

### *HNP Policy 4: Infrastructure provision*

Highways and Transportation: The residential parking standards quoted in criterion A(1) should be modified to align with the County Council’s adopted standards contained in [Interim Guidance Note 3](#) (2008) of the Kent Design Guide (2005).

The County Council recommends that this policy requires cycle parking provision in accordance with the County Council’s adopted standards in [Supplementary Planning Guidance 4](#) (2006). Transport should also be included as a spending priority for commercial / community developments.

## **6. Siting, Landscaping and Protecting the Natural and Historic Environment and Setting**

### *6.ii Views*

PRoW: The County Council recognises that reference has been made to the Greensand Way promoted route, however, there is no other PRoW included in this paragraph, or on HNP Map 12. It is therefore recommended that these are revised. Views from PRoW require protecting from the impacts of future development and should therefore be included within the draft Neighbourhood Plan to future proof the network.

### *6.iii Green spaces*

PRoW: The County Council advises that the draft Neighbourhood Plan should aim to increase the provision of accessible green spaces and improve opportunities to access this resource. Good public transport and active travel links with open spaces should be made available, so that the public are not dependent on private vehicle use for visiting these sites.

### *6.v Development in the countryside*

PRoW: The County Council recommends inclusion of the following sentence within this section:

***“In areas where there would be significant effect on PRoW, the network must also be included in the landscape planning of the infrastructure as a whole”.***

Where PRoW would be directly affected by development proposals, plans should clarify intentions for positively accommodating, diverting, or enhancing paths. The draft Neighbourhood Plan should also seek to ensure that proposals do not adversely affect the existing PRoW network or National Trail. It is requested that additional text is inserted into policy wording, stipulating that applicants for new developments engage with the County Council in regard to public rights of way at the earliest opportunity. This would allow the County Council to review proposals for access improvements and consider appropriate developer contributions for PRoW network enhancements.

Heritage Conservation: It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets, and among farm buildings, would, in many places, be consistent with the historic character of those areas. English Heritage, the County Council and Kent Downs Area of Outstanding Natural Beauty have [published guidance](#) on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. It is advised that this is taken into consideration in the development of the Neighbourhood Plan.

*HNP Policy 2: Siting, landscaping and protecting the natural and historic environment and setting.*

Biodiversity: The County Council notes that the results of ecological surveys should inform development design and landscaping.

The County Council recognises that the draft Neighbourhood Plan is encouraging off-site Biodiversity Net Gain to be located within Headcorn Parish. However, this may not be possible, as Biodiversity Net Gain will be restricted to where habitat creation / enhancement can be carried out. While it is important to ensure that there is no overall loss of biodiversity locally, it is worth noting that a strategic approach to habitat creation / enhancement through off site provision may be more beneficial to biodiversity.

## **7. Connectivity and Access**

### *HNP Policy 3: Connectivity and access*

PRoW: The County Council is disappointed with the omission of the PRoW network in this policy. This policy should reflect the County Council ROWIP policy to improve and upgrade the PRoW network where it links with amenities, public transport modes, work and education to increase the attractiveness of walking, cycling and riding as an alternative to driving (Action 2.2, Reference Code EN01). The County Council would ask that there be specific mention of the ROWIP as it is a statutory policy document for PRoW. It sets out a strategic approach for the protection and enhancement of the PRoW network, connecting the wider community and green open spaces, which would benefit the Neighbourhood Plan. There is also an omission throughout the draft Neighbourhood Plan of any map showing the PRoW network within the Parish. This should be amended with the inclusion of Map 16 or an extra Map which can be provided by the County Council upon request.

This policy should include the need for new developments to incorporate good sustainable transport connections within the community with high quality walking and cycling infrastructure available, which can link local amenities together. Replacing private vehicle journeys with active travel should be encouraged. The County Council is also disappointed that there is no mention of active travel objectives within this policy.

It is therefore critical that wording is included to secure funding to ensure that the highly regarded PRoW links are not degraded, as developer contributions can be used to upgrade existing routes or create new path links that address network fragmentation issues. The County Council advises that consideration should be given to the investment of planning obligation contributions and Community Infrastructure Levy (CIL) funding into the PRoW network.

## **8. Infrastructure Provision**

PRoW: The County Council recommends that reference is made to the ROWIP objective 'Improve Green Infrastructure', to improve infrastructure that can develop safe walking and cycling routes both within a new development and to connect to the wider environment. Increasing levels of active travel participation improves public health and well-being, in addition to improving air quality by reducing short vehicle journeys and vehicle congestion. Rural lanes provide useful connections for Non-Motorised Users (NMUs) travelling between off-road PRoW. The potential for additional vehicle traffic along these country lanes is

therefore a concern, as increased movements could introduce safety concerns for NMUs and potentially deter public use of the PRow network.

The County Council notes that new development provides opportunities to secure investment in the PRow network, which could enhance opportunities for active travel and outdoor recreation across the parish. Consideration should be given to the investment of developer contributions to upgrade existing routes or create new path links that address existing network fragmentation and issues highlighted by the public.

*Figure 39: How are services and infrastructure rated in Headcorn?*

PRow: The County Council recommends that “*Footpaths in the village*” is amended to “**PRow network**” in Figure 39, to demonstrate the opinions of residents on all PRow within the parish.

#### *8.iv Promoting energy efficiency*

Heritage Conservation: The County Council notes that the historic environment has a significant role to play in the conservation of resources required for development, and also in energy efficiency. Old buildings can often be more energy efficient than newer ones and have already been built. Thus, it may take fewer overall resources to adapt an old building than to demolish and rebuild one. Historic England has produced a range of guidance on the role that heritage can play in mitigating climate change and historic building adaptation such as the [Climate Change Adaptation Report \(2016\)](#). This guidance demonstrates that historic structures, settlements and landscapes can be more resilient in the face of climate change and more energy efficient than more modern structures and settlements. This has also been updated in the Historic England report [There’s no Place Like Old Homes: Re-use and Recycle to Reduce Carbon \(2019\)](#). The County Council would therefore recommend that this guidance is reflected within the draft Neighbourhood Plan.

#### *HNP Policy 4: Infrastructure provision*

Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, supports the recognition of flood risk as an issue for the parish. The County Council also welcomes the Vision and Objectives for Headcorn to accommodate flood risk and the impacts that climate change will have on it.

The County Council requests clarification on how criterion C(4) will be achieved regarding who will assess the analysis of the capability of the sewerage systems and wastewater treatment works. The sewerage undertaker has a duty to accept new connections and will make their own assessment of the impacts on capacity.

It is recommended that this policy goes further by requiring that development in the parish, particularly any proposing to connect to the existing drainage network ‘upstream’ of known flooding hotspots (see paragraph 8.20 of the draft Neighbourhood Plan), provides improvements to reduce flood risk off-site.

## **10. The Economy**

### *10.iii Headcorn Aerodrome*

Heritage Conservation: It should be noted that, in addition to being a tourism asset, Headcorn Airfield is also an important heritage asset. The County Council is not aware of whether there has ever been a detailed heritage survey of the site, but it is likely that it contains structures and features of historic importance both within the airfield itself and within surrounding areas, for example, dispersal pens. It is important that these are conserved during normal airfield operations and in the event of any change of use.

### **Additional Commentary**

PRoW: It is requested that the County Council is directly involved in future discussions regarding projects that will affect the PRoW network. This will allow the County Council to advise on the design and delivery of these projects, ensuring that new routes successfully integrate with the existing PRoW network. Future engagement with the District and Parish Council is therefore welcomed to consider local aspirations for access improvements and potential funding sources for the delivery of these schemes.

The County Council requests that the definition and acronym of a Right of Way is included within the draft Neighbourhood Plan. The following definition is advised to be used:

***“A way over which the public have a right to pass and repass, including Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic”***

Minerals and Waste: The County Council, as Minerals and Waste Planning Authority, notes that there is no waste management infrastructure within the Neighbourhood Plan area.

However, there are three safeguarded land-won minerals in the area that are not referenced within the draft Neighbourhood Plan. These are shown below in the Maidstone Borough Council Minerals Safeguarding Areas proposals map within the adopted [Kent Minerals and Waste Local Plan](#) (KMWLP) (2013-2030).

## Maidstone Borough Council Minerals Safeguarding Areas Proposals Map



-  Sub - Alluvial River Terrace Deposits
-  River Terrace Deposits
-  Limestone - Pauldina Limestone, Weald Clay Formation

Although the draft Neighbourhood Plan is not seeking to allocate any additional residential development, speculative development proposals may still come forward on unallocated sites in order to address any identified future needs.

Therefore, any future development that would be constrained by these land-won safeguarded minerals would need to be considered against all the relevant adopted Development Plan policies. It is recommended that the draft Neighbourhood Plan includes an understanding of these safeguarded minerals and the following policies of the adopted KMWLP - Policy CSM 5: Land-won Mineral Safeguarding and Policy DM 7: Safeguarding Mineral Resources.

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The County Council would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,



**Stephanie Holt-Castle**  
Director for Growth and Communities