
Planning Statement

Land at Moat Road, Headcorn

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1. Introduction

- 1.1. This Planning Statement has been prepared by Savills, on behalf of The Master Fellows and Scholars of the College of Saint John the Evangelist in the University of Cambridge and Catesby Strategic Land Ltd (Catesby) to accompany a planning application with following description:

Outline application (with all matters reserved except access) for the development of up to 120no. dwellings (Use Class C3) including demolition of existing buildings, means of access into the site from Moat Road (not internal roads), associated highway works, provision of public open space, emergency / pedestrian access to Millbank and associated infrastructure including surface water drainage (with related off site s278 highway works to Moat Road).

- 1.2. It follows the withdrawal of an earlier outline application (ref: 22/505616/OUT). The earlier application was withdrawn due to allow time to competently respond to statutory consultee comments. These comments have been addressed through this application.
- 1.3. The purpose of this Planning Statement is to explain the proposal and how it accords with relevant planning policy.

The Applicant

- 1.4. This application is made by joint applicants - The Master Fellows and Scholars of the College of Saint John the Evangelist in the University of Cambridge and Catesby Strategic Land Ltd.
- 1.5. The Master Fellows and Scholars of the College of Saint John the Evangelist in the University of Cambridge are the landowners. Catesby Strategic Land Ltd are a leading promoter of residential development across the UK and are part of Urban & Civic. They have over 20 years knowledge and experience of strategic land promotion and infrastructure delivery.

Statement Structure:

- 1.6. This Statement sets out the planning context for the proposed development, including:
- A description of the site (Section 2);
 - Details of the previous planning applications at the site and public engagement history (Section 3);
 - Outline of the proposed development (Section 4)
 - An overview of the relevant planning policies and guidance (Section 5);
 - A policy assessment and planning balance (Section 6);
 - Conclusion (Section 7).

Application Package

- 1.7. This Planning Statement should be read in conjunction with the following plans and supporting documents which collectively form part of the planning application:

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Document / Drawing	Name / Drawing Number
Location Plan	01c Application Boundary Plan
Framework Plan	FWP-01
Sketch Layout Master Plan	SKMP-01
Demolition Plan	11 Existing Site Layout Plan
Biodiversity Net gain Assessment	6196 BNGA 2023 vf
Ecological Appraisal	6196 EcoAp vf4
Arboricultural Impact Assessment	11247_AIA.001 Rev A
Transport Assessment	20472-04d Transport Assessment
Travel Plan	20472-05b Travel Plan
Flood Risk Assessment & Surface Water Drainage	680350-R1(4)-FRA
Noise Assessment Report	2060674-RSK-RP-001(04) - Headcorn Kent - Noise Assessment Report
Air Quality Assessment	444627-01(02) Moat Road, Headcorn - Air Quality Assessment Report
Design and Access Statement	CATE211030 DAS-05 230727_Single Pages low
Landscape and Visual Appraisal	edp5739_r002-E-LVIA
Heritage and Archaeology Statement	R001v5 HT - P21-3568
Statement of Community Involvement	Headcorn SCI Updated September 2023
Minerals Assessment	P969720210506 Issue MRA2 DA&BP

2. Site and Surroundings

The Site

- 2.1. The Land at Moat Road, herein referred to as “the Site” is situated on the western edge of Headcorn and comprises 7.42 hectares (ha) of agricultural land. It lies outside of but immediately adjacent to the settlement edge and to the immediate south of Catkins Gardens, a new development of 62 dwellings. It is formed by two field parcels with a hedgerow / tree line located centrally between the parcels running east west.

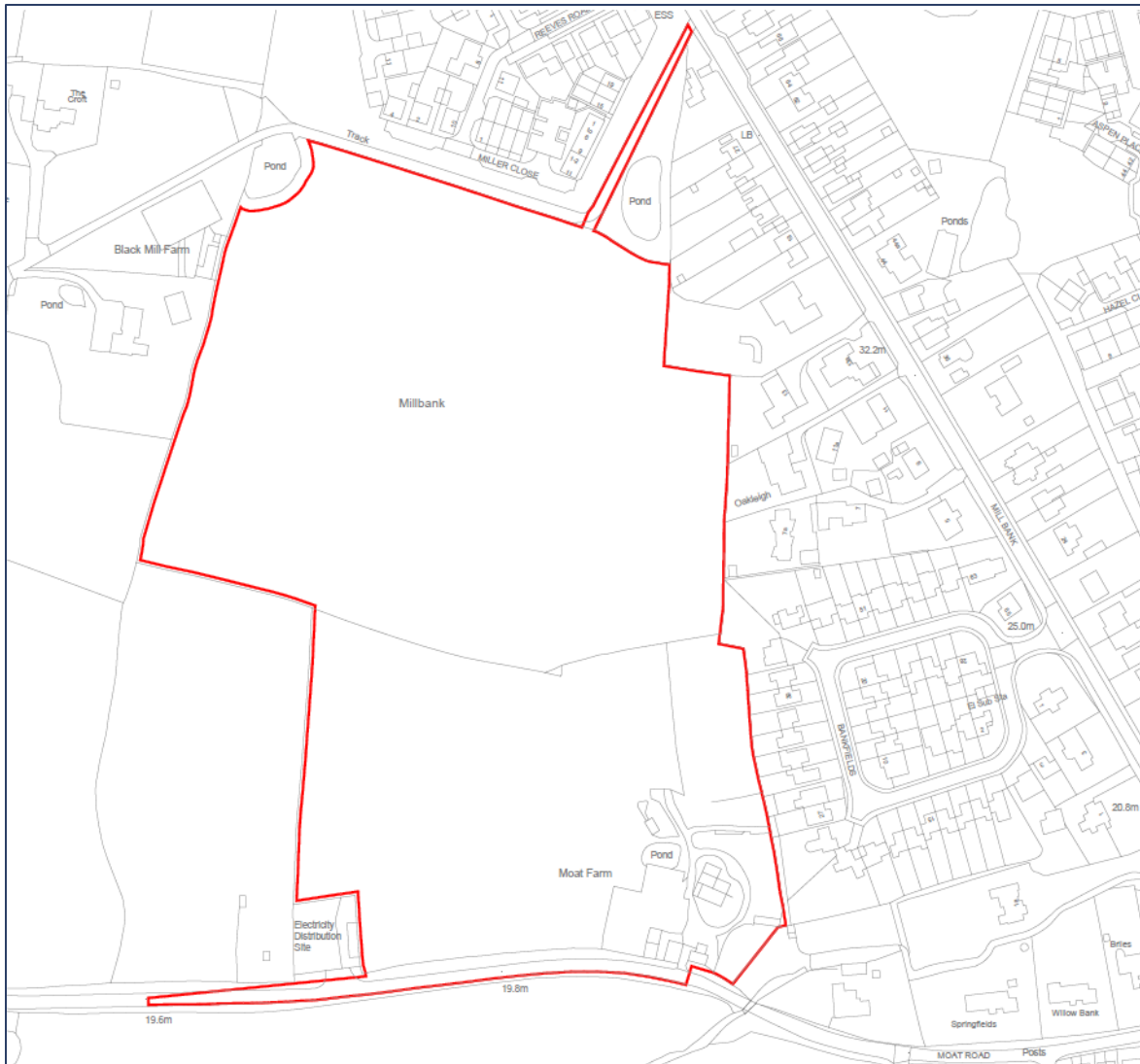


Figure 2.1- Site Location Plan

- 2.2. The site is otherwise bounded by Moat Road to the south, residential back gardens of Bankfields and Mill Bank to the east, and agricultural land to the west. Several dwellings and farm buildings are situated to the north west (accessed off Black Mill Lane) and an electricity substation sits to the south west corner of the site off Moat Road. The site is at a higher level to the north and drops towards the south.

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- 2.3. With regard to designations, the site is relatively unconstrained. The majority of the site lies in flood zone 1, which has the lowest fluvial risk of flooding. A small section of the south eastern corner of the site is however in flood zones 2 and 3. This is due to the proximity of the site to the River Beult (to the south) which is also a SSSI. Whilst the northern most part of the site lies within the Low Weald National Character Area, this is not a national landscape designation such as AONB. There is an existing pond within the site and two ponds adjacent to the site.
- 2.4. From a heritage perspective, the Site is not within a Conservation Area and does not contain a listed building or registered park and garden. The closest listed building to the site is The Moat, which is a grade II Listed former farmhouse (reference ID: 1060848), which is located to the south east of the site. In relative proximity to the farmhouse but within the south east corner of the site, are a range of dilapidated former agricultural buildings which have no architectural or historic merit. These dilapidated buildings are proposed for demolition as part of this planning application. Accordingly given their association with the listed farmhouse an application for listed building consent is also submitted.
- 2.5. More widely whilst there are a number of other listed buildings in Headcorn, these predominantly lie in the centre of the village which is also designated as a Conservation Area.
- 2.6. Trees are sited principally on the site boundaries and the central field line. The most significant tree is a mature English oak which lies outside of the Site to the north tree. A hedgerow is also present along the Moat Road boundary. The site is affected by Tree Preservation Order (TPO) no.5 1986. Following inspection of the site by Aspect Arboriculture, groups of the TPO (those set within the central hedgerow) were not present. There were no Oak trees present in either location. Thus only three areas are within the TPO, one of these areas is off site and the others lie on the sites' boundary. Further details of the trees on Site can be seen in the accompanying Arboriculture technical note.
- 2.7. Existing access to the site is via an area of hardstanding off Moat Road which currently accommodates former farm sheds. Secondary access is available from a field gate to the north east corner connecting to Mill Bank. A Public Right of Way (PRoW) (KH590) crosses the southern half of the site, starting at Moat Road and crossing to the north west, central boundary. There are no other PRoW within the site.

Surrounding Context

- 2.8. Headcorn is a well serviced village with several facilities and is recognised in the current Local Plan as a Rural Service Centre. Such locations are regarded as sustainable and sit below only Maidstone in the settlement hierarchy. The facilities in Headcorn range from a primary school, a library, a Post Office, convenience stores, petrol station, and public houses / restaurants. There are also a number of churches and a village hall, in addition to a doctor's surgery and pharmacy. All of these facilities are within walking and cycling distance of the site.
- 2.9. For access further afield, the village is well located within the public transport network, with the Headcorn train station situated approximately 0.6 miles from the site. This provides regular services to London Charing Cross, London Cannon Street, Dover Priory, Ramsgate and Folkstone. There are also a number of bus stops in the immediate area, notably in the vicinity of the high street and train station, providing access to services towards Tenterden and Maidstone. A public footpath crosses the site and links into a wider network of public rights of way.

3. Planning and Engagement History

Applications on the Site

- 3.1. An outline application (ref: 22/505616/OUT) was submitted in November 2022 and comprised:

Outline application (with all matters reserved except access) for the development of up to 120no. dwellings (Use Class C3) including demolition of existing buildings, means of access into the site from Moat Road (not internal roads), associated highway works, provision of public open space, emergency / pedestrian access to Millbank, realignment of the existing public right of way and associated infrastructure including surface water drainage.

- 3.2. It was withdrawn on 28th March 2023 due to insufficient time left within the agreed determination period to allow a response to some of the statutory consultee comments. These comments have been addressed within this application and details can be found within the 'Planning Considerations' section of this report and the submitted technical reports.
- 3.3. Several comments raised no objection to the proposals. These included Kent Police, The Environment Agency, Headcorne Aerodrome, KCC Minerals and Waste, KCC PRoW, Parks and open space, Southern Water, Natural England and KCC Contributions. No objections were raised in these comments.
- 3.4. There were outstanding responses from MBC Landscape Officer and MBC Conservation Officer.

Nearby Development

Land West of Mill Bank Maidstone Road, Headcorn (also known as Catkin Gardens) - 15/0507424/OUT

- 3.5. In 2015, an Outline planning application was granted permission at Committee, for the construction of 62 dwellings (including a minimum of 40% affordable housing), planting and landscaping. The application was recommended for approval by officers despite the departure from the adopted Local Plan (2000). In the context of the five year housing land supply shortfall at the time. It was considered that the low adverse impacts of the development were outweighed by the benefits of approving the development. This recommendation was subsequently approved by the Planning Committee.
- 3.6. It was concluded that the proposed development was “*at a sustainable location adjoining the existing village boundary of Headcorn and is accessible to the village centre and local service. On this basis it is concluded that the proposed development would not result in significant planning harm.*”
- 3.7. The proposed development at Moat Road would result in a natural expansion of the village of Headcorn.

Pre-Application

July 2022

- 3.8. Pre-application advice was sought from MBC in Spring 2022 with a meeting taking place in July 2022 and written feedback in September 2022. Advice was sought on a proposal for 130 units which reflected the previous allocated capacity of the site. During the meeting, Officers made the following observations:

- **Officers considered that a development of 130 dwellings was unlikely to be acceptable in relation to the emerging policy. However, they did consider that some flexibility was possible with the final number given the phrase ‘approximately 110 dwellings’ was included within the emerging policy. This was on the basis that other policy requirements were met and sufficient information was submitted with the outline application to demonstrate that more could be accommodated.**

This application seeks permission for up to 120 dwellings. It is considered that all policy requirements have been achieved as part of this proposal. Furthermore, this figure is the result of technical capacity testing against the site constraint to ensure an appropriate number can be accommodated without causing significant impacts.. Detailed justification for this number is provided in Section 6 of this report.

- **Landscape was noted as a key consideration for the development. Officers raised the following key concerns:**
 - **The edge of village location and requirement for sensitive design;**
 - **Views from the west into the site; and**
 - **The proximity of the proposed built form to Moat Road.**

A Landscape and Visual Appraisal is submitted with this application which sets out that the visual impacts are limited, and that sufficient landscape mitigation has been incorporated into the proposal. Further details are provided in section 6 of this report and within the Landscape and Visual Appraisal. Indeed, it should be noted that the sensitive western edge of the development has already been significantly altered from earlier iterations with the incorporation of a green buffer and a lower density character area.

- **Officers noted that run-off and pollution into the River Beult (SSSI) had been raised as an issue through the pre-examination Local Plan works and would need to be considered as part of this proposal.**

The Ecological Appraisal submitted with this application explains that the SSSI in proximity to the site is located in private ownership with no access via public rights of way, thus it is unlikely that there will be an increased dumping or recreational disturbance caused by the development. The proposal also includes substantial open space along with attenuation ponds, including at the far south of the site, which will further reduce any potential risk of surface water runoff or recreational disturbance.

- **Officers sought confirmation that the access arrangements through the flood plain were suitable and that there were limited ecological and landscape impact caused by it.**

A Transport Assessment and a Flood Risk Assessment are supporting this application. These demonstrate that suitable access is achievable. Furthermore, an emergency access is proposed to the north and connects directly to Mill Bank.

- **Details of offsite highways improvements were requested by Officers, including the location of the pedestrian crossing point and how it will be managed.**

A Transport Assessment and suite of highways drawings is provided with this application which indicate how the offsite highways works will come forward. Detailed design will be completed via S278 works in line with Kent County Council Highways.

- **Street trees were noted as important in accordance with the NPPF and member views. Sufficient space to accommodate these is required in the design.**

Sufficient space for street trees has been designed into the indicative layout.

- **Officers noted a preference that the Design and Access contained key principle for the detailed design so this could be conditioned as part of and permission.**

The Design and Access Statement supporting this application set out key principle for the four defined character areas.

- **The proposed character areas were discussed, notably the transitional frontage, which provided a softer edge to the west and south of the development. MBC officers agreed with the proposal of lower densities and 1-2 storeys in this location.**

As above, details of the proposed character areas are set out within the Design and Access Statement.

- **An overview of the heritage constraints was provided by Pegasus. However, discussion was limited as the Council's heritage officer wasn't present. No further heritage input was provided.**

A Heritage Report is provided with this application. A Listed Building Consent application will be submitted for the demolition of the farm buildings if they are deemed to be curtilage Listed by the LPA.

- **Offsite Biodiversity Net Gain (BNG) was discussed, and MBC confirmed they had no offsite mitigation, suggesting that Catesby discuss with Kent County Council Ecology and Kent Wildlife Trust. MBC confirmed they would work with Catesby in this regard.**

A BNG assessment is provided with this application. It confirms that the policy requirement of 20% BNG can be achieved onsite.

- **A clear movement strategy was requested. An indicative movement strategy is found on Pages 22 & 23 of the DAS. Comprehensive details will be provided at reserved matters stage. However, the following connections are detailed within this application:**

- Access from Moat Road;
- New footway and improvements on Moat Road;
- Emergency access to Millbank to the north of site.

July 2023

3.9. A further pre-application meeting was held with MBC on 13th July 2023. At this meeting the Case Officer (Marion Geary) set out the following points which have been address below each bullet point:

- **Concerns were raised regarding the emergency access.**

The access track to Mill Bank can be used as a pedestrian and cycle link as well as an emergency link for vehicles if required . Access from the track to the site would require minimal clearance to an existing gate.

- **Whether the PRoW diversion was a necessity to the proposed development.**

The realignment of the PRoW has been removed from this application. If a diversion is required, this can be sought later in the development process once finalised layouts are confirmed.

- **Consideration should be given to the view of the Church from the site.**

The submitted Heritage Assessment explains that during winter months, there are incidental, heavily filtered glimpses of the Church of SS Peter and Paul tower from the site. The development of the site in line with the Parameter Plan would further restrict visibility of the church tower from within the site, understanding the significance of the church is not contingent on the incidental, heavily filtered glimpses observed. Thus, development of the would not harm the setting of the listed building.

- **Consideration of the impact of the demolition of the curtilage listed building.**

The applicant will submit a Listed Building Consent application for the demolition of the curtilage listed building. This is separate from this outline planning application.

- **Consideration of the Archaeology at the site including the important of the Royal Observatory Monitoring Post.**

Further archaeology information has been provided with this application including a geophysical survey and details on the reinstatement of the land following the closure of the Royal Observatory Monitoring Post. The geophysical survey of the site did not identify any anomalies potentially indicative of significant archaeological remains.

- **Further details were requested in relation to the access arrangements and road layout amendments.**

Arboricultural advice has been sought regarding the potential impact the proposed highway works to Moat Road will have on trees. It is confirmed that no trees will be lost except for two grade C trees within the site redline to facilitate these works. The proposals along new Road have been adjusted to ensure that sufficient protection is provided to the trees which sit close to the highway boundary.

- **Further design details in relation to the proposed character areas.**

Further information on the proposed character areas is provided within the Design and Access Statement.

- **Greater information on the Landscape and visual impacts of the development including the submission of a full Landscape and Visual Impact Assessment (LVIA) in accordance with emerging Policy LPRSA310.**

An LVIA is submitted with this application and includes greater detail of the effects of the proposed development. To assist in the assessment, photomontages have been provided which highlights the level of existing and future natural screening of the site from the areas considered of greatest sensitivity or where the greatest level of change is predicted. The Assessment concludes that the site has the capacity for the proposed development.

Public and Stakeholder Engagement

Public Engagement

- 3.10. The NPPF Paragraph 39 explains that early and good quality pre-application engagement can enable better coordination between public and private resources and improve the outcomes for the community. Catesby always seek to interact with local communities early within the planning process. As part of this, ongoing liaison with a wide range of stakeholders has taken place.
- 3.11. This includes an online public exhibition using a dedicated website, where members of the public could view the proposals and submit comments. In tandem with this in person meetings have been held with Headcorn Parish Council and with the local ward member Councillor Martin Round. Finally, one online stakeholder session has been held via zoom with adjoining residents closest to the eastern boundary of the site.
- 3.12. This engagement has resulted in a 10m landscape corridor being incorporated into the proposals lining the eastern boundary. This will provide a buffer to the existing properties lining the eastern edge of the Bankfields cul-de-sac and so protect the amenity of these existing residents.

Stakeholder Engagement

- 3.13. A Members briefing was held at Maidstone Borough Council Office (Maidstone House) on 14th September 2023. This involved presentations to Council Members and the Parish Council from Head of Planning, the Case Officer and the Applicant. Members of the Council and Parish Council were then provided the opportunity to ask questions relating to the scheme.
- 3.14. Further information on the public and stakeholder engagement can be found in the Statement of Community Involvement supporting this application.

4. The Proposal

4.1. This application description is as follows:

Outline application (with all matters reserved except access) for the development of up to 120no. dwellings (Use Class C3) including demolition of existing buildings, means of access into the site from Moat Road (not internal roads), associated highway works, provision of public open space, emergency / pedestrian access to Millbank and associated infrastructure including surface water drainage (with related off site s278 highway works to Moat Road).

Access

4.2. The main access into the site will be via a new priority junction onto Moat Road. Details of the junction and the associated visibility splays have previously been agreed with Kent County Council and are detailed within the Transport Assessment and Drawing 20472-03 RevC and Drawing 20472-03-2 RevC. From this access the primary route will meander northwards with secondary road arching to the east and west to connect the character zones together.

4.3. An emergency vehicle access would also be provided in the north east corner, which can also serve as a further pedestrian and cycle link onto Mill Bank and to the surrounding area.

4.4. A range of pedestrian links are provided to the wider area including connections to the existing footpath network. This includes a new footway along Moat Road which is supported by a priority arrangement at the Moat Road bridge (all Section 278 works). Details of this footway are set out in drawing 20472-03-3 RevA..

Character

4.5. The development would be focused on quality of design, with a landscape led approach that incorporates a range of dwelling types, styles, sizes and tenures, including affordable housing, and utilising a range of materials to create visual interest and support place making.

4.6. Four character areas are proposed as set out within the Design and Access Statement. These are briefly set out below and further details should be sought within the Design and Access Statement.

- *Main Street & Central Green*

This character area relates to the built form fronting the primary route through the development and the central green open space. It provides the central area with an active frontage of mainly 2 storey, semi-detached and terraced dwellings.. A medium density is sought and parking will be set behind the building line to emphasize the prominence of the built form. New trees will emphasize the street lines and public realm.

- *Settlement Edge*

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The Settlement edge is situated on the eastern edge of the development, adjacent to the existing built form. This edge has a 10m wide landscape buffer running along the whole length of the boundary, this to ensure the protection of the amenities of the existing properties. Dwellings in this location will be predominantly 2 storeys, detached or semi-detached.

- *Core*

The Core relates to the internal areas within the development that do not fall on the primary route. The development will be mostly 2 storeys however. These dwellings will be either detached, semi-detached or terraced and will include apartments. Parking will be either behind the building frontage or frontage parking on secondary streets. A medium density is sought.

- *Rural Development Edge*

This zone comprises the western and north edge of the developable area. Dwellings will be 1 or 2 storeys at a lower density. Predominantly detached dwellings serviced from rear gated mews style lanes or from private drives and parking discreetly located. In higher locations bungalows will be proposed. Lighting will be sensitively design to avoid light *spill* into the surrounding landscape.



Figure 4.1 – Character Area Plan

Unit Mix

- 4.7. The proposed development will provide up to 120 new dwellings. Of this 40% will be affordable at a split to be agreed with the Council's housing officer. The final unit mix will be determined within a detailed reserved matters application(s).

Density

- 4.8. The development would result in a net density of 16.5 dwellings per hectare (dph) which includes 3.26 ha of open space (formal and informal spaces plus semi natural wildlife areas). Thus, there is a smaller developable area of circa 4ha and with a corresponding density of approximately 30dph. It is noted within the masterplan that as development moves further west away from the existing built form, the density gradually decreases.

Heights

- 4.9. The dwelling heights will be limited two storeys with the opportunity for a percentage of single storey bungalows within the relevant character area.

Parking

- 4.10. Parking will be confirmed at Reserved Matters stage, however the illustrative plan indicates sufficient space to provide parking in accordance with the Council's parking standards.

Open Space and Landscape

- 4.11. The developable areas are proposed on the eastern and central areas of the site in proximity to the existing residential development. This enables a large area of green space and a significant landscape buffer to be provided to the west and south. A central green amenity area will be provided utilising the existing field hedgerow/tree line and a green corridor will extend northwards along the primary road through the development.
- 4.12. A 10m landscape buffer is proposed along the eastern boundary to ensure the privacy of the existing residents is maintained. This will be for natural green space will provide space for ecological enhancements and act as a buffer between the existing dwellings to the east and the development site.
- 4.13. The green infrastructure and residential areas will be connected via a network of new foot and cycle paths. These paths will connect into the wider network outside the site. Importantly, as part of the proposals a footpath will connect to Moat Road in the south eastern corner. Upgrades to Moat Road will be implemented to allow for a new footpath and crossing to create a new connection into the village centre.
- 4.14. The overall site area is 7.42 ha. The residential land use occupies 3.95ha and the rest is open space which is 3.26ha. This comprises open space to accommodate existing trees/ planting, amenity space, SuDs features, Children play, recreation footpaths, vehicle access, EA Flood Zones 2 and 3 associated with off-site River Beault. A total of 3.26Ha of open space is provided, including a LAP which is proposed within the north western boundary.

Drainage

- 4.15. SUDS form an important element of the open space. All proposed SUDS ponds are within flood zone 1 but the southern pond which is adjacent to the higher risk areas. No development would be within this corner of the site due to the higher risk flood zone, but this will provide a greater degree of space and separation between the proposed development of the site and the closest listed building, The Moat (former farmhouse). A further SUDS pond is proposed on the south western area of the northern field. These ponds will be integrated into the landscaping strategy to ensure they are multi-functional.

5. Planning Policy Framework

National Planning Policy

- 5.1. The revised National Planning Policy Framework (NPPF) was published in September 2023. It sets out the national policy which guides Local Planning Authorities (LPA) on plan making and decision taking.
- 5.2. Paragraph 8 the NPPF identifies three overarching objectives to sustainable development; economic, social and environmental which are interdependent and need to be pursued in mutually supportive ways. These objectives are:
- a) **an economic objective** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) **a social objective** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
 - c) **an environmental objective** – *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
- 5.3. The NPPF includes a presumption in favour of sustainable development which should be seen as the golden thread running through both plan-making and decision-taking. Paragraph 11 states that, for decision making, this means:
- “Approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*
- 5.4. In order to achieve sustainable development, the NPPF sets out several aims which provide the context for assessment of development proposals. The different aims – so far as they are relevant to the assessment of this application – are set out in Section 6 of this planning statement.

Development Plan

5.5. The adopted Local Development Plan comprises:

- *Maidstone Local Plan (2017);*

The Core Strategy was adopted in October 2017 and sets out the priorities for the future of the district. It allocates a number of strategic sites and contains the Core Policies to guide future development between 2021-2031. Within this period, MBC is seeking to deliver 17,660 dwellings as set out in Policy SS1.

The Adopted Local Plan identifies Headcorn as Rural Services Centre within the MBC Settlement Hierarchy and Adopted Policy SS1 explain that these Rural Service Centres are the secondary focus for housing development with an emphasis on maintaining and enhancing their role and the provision of services to meet the needs of the community

Paragraph 4.79 states:

“Headcorn has a diverse range of services and community facilities which are easily accessible on foot or by cycle due to the compact form of the village. There are local employment opportunities and there is a local wish to ensure that existing employment sites are kept in active employment use. A regular bus service runs between Headcorn and Maidstone and the village has good rail linkages to other retail and employment centres, including London.”

- *The Kent County Council Minerals and Waste Local Plan 2013-2030 ;*

The Kent Minerals and Waste Local Plan 2013-30 was initially adopted July 2016 and amended in 2020. It sets out a vision and strategy for waste management and mineral provision up to 2030. The site is partly location within an area of Limestone. In accordance with the Kent Minerals and Waste Local plan SPD (2021) allocated development that has concluded that the safeguarding of minerals management, transportation production and waste management facilities has been fully considered within the plan making process are exempt from safeguarding.

The Minerals Safeguarding and Waste Infrastructure Assessment that supports the Local Plan review concludes that *“any prior extraction would be limited by limited availability of this resource and the site boundary conditions, which includes a number of residential properties. Taking into account DM9, extraction would not be viable or practical at this site”*. As such, it is the minerals in this location are not safeguarded.

- *Kent Minerals Sites Plan;*

The Kent Minerals Sites Plan was adopted in September 2020 details locations in Kent which are suitable for quarrying essential minerals needed to support growth and the economy. This details that the northern section of the site is within an area of Limestone.

- *Any made Neighbourhood Plans;*

The site is not within a Made Neighbourhood Plan.

5.6. Relevant policies are referenced within Section 6 and assessed against the proposed development. However, for reference these are also listed below:

- Policy SS1 Maidstone borough spatial strategy
- Policy SP7 Headcorn rural service centre
- Policy SP19 Housing Mix
- Policy SP20 Affordable Housing
- Policy SP21 Economic development
- Policy SP23 Sustainable Transport
- Policy H1 Housing site locations
- Policy H2 Broad locations for housing growth
- Policy DM1 Principles of good design
- Policy DM2 Sustainable design
- Policy DM3 Natural environment
- Policy DM4 Air quality
- Policy DM19 Open space and recreation
- Policy DM23 Parking standards

Supplementary Planning Documents and Guidance

5.7. Maidstone Borough Council has adopted a number of Supplementary Planning Documents (SPDs) and Guidance Documents. Those relevant to this application are listed below:

- Affordable and local needs housing (SPD)
- Kent Design Guide (2005)
- Kent & Medway Structure Plan 2006: SPG4 Vehicle Parking Standards
- Kent Design Guide Review: Interim Guidance Note 3-Residential Parking

Emerging Local Plan

Process

5.8. MBC is currently reviewing their Local Plan and undertook a Regulation 19 consultation in December 2021. Within the Regulation 19 Local Plan Document, the site has been allocated for residential development under emerging policy LPRSA310 for approximately 110 dwellings. This plan has now been submitted to the Secretary of State for examination. The Examination in Public is taking place in two stages. The first seeks to clarify the Inspector main questions and the second stage will consider other items including site

allocations such as the Land at Moat Road (Draft Policy LPRSA310). The first and second stage of hearings are now complete with the proposed main modifications to be consulted on at the end on September 2023.

- 5.9. Draft Policy LPRSA310 was assessed at the hearing session on the 18 May 2023 whereby minor amendments to the wording on the draft policy were requested in relation the pedestrian and cycle connectivity along Moat Road and the need to ensure emergency vehicles can appropriately access the site.. These are detailed within the Proposed Main Modifications which is soon to undergo a public consultation. No further issues arose from the hearing. Furthermore, the Inspector has since published his conclusions on the Stage 2 hearings which raised no further concerns with the allocation. Importantly, the Inspector states:

“Having considered the Council’s proposed modifications (principally presented in documents LPRSUB011 and D53) together with statements and discussion with participants at the hearing sessions, I consider that the Local Plan Review could be made sound by main modifications.”

- 5.10. The emerging Local Plan is at a very advanced stage and should be awarded significant weight.

Drafted Policy Strategy

- 5.11. MBC is seeking to deliver 17,355 dwellings across the Plan Period (2022-2037) which equates to 1,157 dwellings per annum. In respect of the spatial strategy, paragraph 5.20 of the Emerging Local Plan states:

“Development will be delivered at the most sustainable towns and village locations in the borough where employment, key services and facilities together with a range of transport choices are available or accessible.”

- 5.12. In this case, Headcorn is identified as a Rural Service Centre within the Settlement Hierarchy and noted as important in serving the local area. New development in these location will support the role of the Rural Service Centre as set out in paragraph 5.31. Draft Policy LPRSS1 explains that these settlements are a secondary focus for housing development. Further to this, Draft Policy LPRSP6(C) relates to Headcorn and includes detail on the allocations and infrastructure requirements in the area. A key addition to the policy in the proposed main modifications relates to the need for ensure development does not have an adverse effect on the River Beult SSSI.

- 5.13. Draft Policy LPRSA310 allocates the land at Moat Road for approximately 110 dwellings. Requirements for development in this location are set out within the policy. These are categorised into the following subsections: Design and Layout; Landscape/ecology; Access, Highways and Transportation; Flood Risk/Drainage/ Open Space and Utilities Infrastructure. The following requirements are relevant to this outline application:

- Built development shall be set back from Moat Road and the western boundary;
- Residential density and typologies shall reflect the site’s semi-rural setting;
- The layout of new dwellings and roads shall respect the amenities and setting of adjacent residential properties;
- The residential elements shall be defined by distinct character areas;
- Lower densities and built form on the western portion of the site;
- The layout and form of buildings shall be designed to mitigate the rising topography with E-W landscaping introduced to break up the overall visual massing;

- Site design and layout shall be informed by a local historic impact assessment;
- Existing tree/hedgerow margins should be retained/enhanced in order to provide the opportunity for biodiversity habitat creation/enhancement;
- The proposed landscaping scheme shall respect and protect TPO trees within the site or adjacent to boundaries;
- The existing hedgerow fronting Moat Road shall be retained and enhanced and the impacts of any access junction minimised and mitigated;
- Vehicular access routes within the development shall feature tree planting;
- Vehicular access shall be via Moat Road, with junctions and sight lines designed to appropriate capacity and safety standards;
- Development will be subject to the provision of acceptable and safe off-site pedestrian and cycle connectivity along Moat Road to the A274. Any new footways shall be designed to ensure that there are no adverse or ecological impacts and maintain the rural character of Moat Road;
- Development shall respect and enhance the setting of any PRoW within or adjacent to the site.
- Appropriate safe pedestrian access onto Maidstone Road will be required via the northern boundary of the site;
- Provision shall include no less than 1.9 ha of semi/natural open space the principle focus of which shall be to contribute to biodiversity net gain;
- No less than 0.8ha of open green amenity space shall be provided, incorporating appropriate children's play space to meet the needs of the development.
- Development must ensure appropriate access for emergency vehicles.*

**Includes the proposed modification to emerging Policy LPRSA310 within the Schedule of Proposed Main Modifications to the Regulation 19 Maidstone Local Plan Review – Post Stage 2 Examination Hearings published for the Planning, Infrastructure and Economic Development Policy Advisory Committee (18th September 2023)*

5.14. Details on how the proposed development complies with this policy are set out in Table 6.1.

5.15. A full review of relevant policies is detailed within section 6. Relevant policies for this proposal are listed below:

- LPRSP6: Rural Service Centres
- LPRSP6(C): Headcorn
- LPRSP10: Housing
- LPRSP10(A): Housing Mix
- LPRSP10(B): Affordable Housing
- LPRSP12: Sustainable Transport
- LPRSP14: The Environment
- LPRSP14(A): Natural Environment
- LPRSP14(C): Climate Change
- LPRSP15: Design

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Housing Land Position

- 5.16. The Council's 5 Year Housing Land Supply on 1st April 2022 was 5.1 years, as published on the Council's website. However, an Appeal Decision in August 2022 (Ref: APP/U2235/W/22/3305441) states a supply of 5.35-7.19 years. Thus, MBC is currently able to demonstrate the required housing supply.
- 5.17. Within the context of the Housing Delivery Test 2021, MBC scored 170% and is not subject to any consequences.

6. Planning Considerations

Principle of development

- 6.1. The NPPF is clear that the purpose of the planning system is to contribute towards achieving sustainable development. This means meeting the present day needs without compromising the future. NPPF paragraph 8 further expands on this by defining the three overarching sustainable development objectives – economic, social and environmental.
- 6.2. The NPPF places great emphasis on significantly boosting the supply of homes, as set out in paragraph 59. Furthermore, NPPF paragraph 119 states that planning policies and decision should:
- “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.”*
- 6.3. Headcorn is identified as Rural Services Centre within the MBC Settlement Hierarchy set out in the adopted Local Plan and the emerging Local Plan Review. Adopted Policy SS1 and emerging Policy LPRSS1 explain that these Rural Service Centres are the secondary focus for housing development with an emphasis on maintaining and enhancing their role and the provision of services to meet the needs of the community. Paragraph 6.102 details that Rural Service centres have high deliverability due to the land price-house price balance. Emerging Policy LPRSP6 sets out that housing in a Rural Service Centre will be focused on sites with an allocation and the allocation of this site is reiterated in Emerging Policy LPRSP6(c).
- 6.4. The principle of the development has been established via the draft allocation of the site (Policy LPRSA310) in the submitted Local Plan Review. This site has now been assessed as part of the examination. Paragraph 48 of the NPPF sets out that Local Planning Authorities may give weight to relevant policies within an emerging plan depending on the stage of preparation, the level of unresolved objection and the consistency with the NPPF. Where the Plan is more advanced and there are less significant objections, greater weight may be given. The allocation has now been assessed by the Inspector who has not found any significant concerns with the site that cannot be dealt with via the proposed main modifications as set out in paragraph 5.8-5.10 of this planning statement. Moreover, the Inspector considers that the entire Local Plan Review could be made sound through the proposed main modifications.
- 6.5. The draft allocation of the site should be given significant weight within the determination of this application, given that the Local Plan Review is at a very advanced stage whereby:
- The site has undergone examination at a hearing in public;
 - The level of unresolved objections to the site and the Plan are limited;
 - The Inspector considers that the Local plan could be made sound.
- 6.6. Draft Policy LPRSA310 states:
- Land at Mote Road Headcorn is included as a draft allocation for the development of **approximately** 110 dwellings.*

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6.7. This application seeks outline consent for a development of up to 120 dwellings. This falls comfortably within the approximate figure set out within the draft policy and ensures that best use is made of this valuable land resource in providing much needed housing. There is really no justification to artificially reduce the site’s capacity down to 110 dwellings when the submitted illustrative masterplan clearly shows that 120 dwellings can be very comfortably accommodated without causing any wider detrimental impact, and includes a significant proportion of green open space. Indeed this will also maximise the quantum of affordable housing which is delivered on site.

6.8. Through representations to the Regulation 19 Local Plan Review, Catesby recommended an amendment to the policy to reflect an earlier capacity of 130 dwellings. MBC’s response to this, as set out in the states:

“The Council is satisfied with the current policy wording, which allows a degree of flexibility on the final number of units on the site through the use of the word ‘approximately’”.

This was reiterated at examination.

6.9. Given the above, it is considered that the proposed capacity of this site at 120 dwellings falls within the flexibility of the draft allocation, particularly so given the NPPFs requirement to make best use of development land (NPPF Para 125). This all being achieved whilst still achieving the requisite on site Biodiversity Net Gain and providing 3.26ha of open space on site.

6.10. Draft Policy LPRSA310 also sets out several development requirements. These elements of the proposal will be considered within relevant sections of this planning statement. However, a summary of key requirements is provided in Table 6.1 below.

Table 6.1: Compliance with Draft Policy LPRSA310

Policy Requirement	Proposal
Built development shall be set back from Moat Road and the western boundary	The proposed layout includes a substantial area of public open space which encloses the development on the north eastern portion of the site ensuring that the built form is set back from Moat Road and the western boundary.
Residential density and typologies shall reflect the site’s semi-rural setting	The proposed average density is 30dph which is reflective of surrounding development including Catkins Gardens to the north of the site. The density of the proposed character areas will vary to reflect the vision for the development. This includes a lower density on the western boundary of built form. Typologies will be determined through a detail application.
The layout of new dwellings and roads shall respect the amenities and setting of adjacent residential properties.	The existing residential areas are to the east and north of the development. A 10m landscaping buffer is proposed on the eastern boundary. To the north, a buffer of public open space is proposed and the ‘rural development edge’ character area is proposed which provides a softer edge to the development.

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<p>The residential elements shall be defined by distinct character areas</p>	<p>Four character areas are proposed and are details in paragraph 4.6 of this planning statement and within the Design & Access Statement.</p>
<p>Lower densities and built form on the western portion of the site</p>	<p>The 'rural development edge' character area comprise the western, southern and north edge of development. In these locations a reduced density and built form is proposed to provide a softer edge to the development.</p>
<p>The layout and form of buildings shall be designed to mitigate the rising topography with E-W landscaping introduced to break up the overall, visual massing.</p>	<p>A central green space is proposed on the boundary between the two development parcels from the east - west, where the topography changes most. This focus on the mature trees and hedgerow forming part of the old hedgerow boundary between the parcels which breaks up the built form. The indicative layout demonstrates how the internal road structure could come forward taking into account the topography. Details of the layout will be finalised at reserved matters stage.</p>
<p>Site design and layout shall be informed by a local historic impact assessment.</p>	<p>A heritage assessment has been submitted with this application taking into account Moat Farm and archaeological potential. The surrounding site context has been analysed as part of the design evolution. This is set out within the Design and Access Statement.</p>
<p>Existing tree/hedgerow margins should be retained/enhanced in order to provide the opportunity for biodiversity habitat creation/enhancement.</p>	<p>All vegetation is to be retained on site other than a small section of the hedge on Moat Road to allow for access and another very short length at the access to ack Mill Lane. A new area of woodland and scrub is proposed in the western parts of both the northern and southern site parcels. Additional tree planting will be provided throughout the scheme with note to street trees.</p>
<p>The proposed landscaping scheme shall respect and protect TPO trees within the site or adjacent to boundaries.</p>	<p>An Arboricultural Impact Assessment is submitted with this application and confirms that no veteran, individually moderate quality, or high quality trees are proposed to be removed.</p>
<p>The existing hedgerow fronting Moat Road shall be retained and enhanced and the impacts of any access junction minimised and mitigated.</p>	<p>A very short length of hedgerow to facilitate the site access onto Moat Road.</p>
<p>Vehicular access routes within the development shall feature tree planting.</p>	<p>The Principle Plan within the Design and Access Statement indicates the tree lined main route through the scheme. Tree lined streets are also a feature of the Main Street & Central Green character area.</p>

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Vehicular access shall be via Moat Road, with junctions and sight lines designed to appropriate capacity and safety standards.	The supporting transport statement and highways drawings (20472-03-3) demonstrate that the a safe access can be achieved for the development with the appropriate visibility splays.
Development will be subject to the provision of acceptable and safe off-site pedestrian and cycle connectivity along Moat Road to the A274. Any new footways shall be designed to ensure that there are no adverse or ecological impacts and maintain the rural character of Moat Road. *	The existing track to the north east of the site will be formalised into at cycle and foot connection to Mill Bank. Drawing 20472-03c demonstrates the proposed improvements to the Moat Road, including a proposed widening to the footway and a new crossing with dropped kerb.
Development must ensure appropriate access for emergency vehicles. *	An emergency access is proposed to the north east of the site connecting to Mill Bank. This is suitable for emergency vehicles.
Development shall respect and enhance the setting of any PRow within or adjacent to the site.	The PRow is within the proposed open space. Details of the treatment will be provided at detailed application stage.
Appropriate safe pedestrian access onto Maidstone Road will be required via the northern boundary of the site.	The existing track to the north east of the site will be a cycle and foot connection to Mill Bank (connecting to Maidstone Road, A274). This link will also serve as an emergency access.
Provision shall include no less than 1.9 ha of semi/natural open space the principle focus of which shall be to contribute to biodiversity net gain	The proposals include 3.26ha of open space overall which fully complies with these requirements.
No less than 0.8ha of open green amenity space shall be provided, incorporating appropriate children's play space to meet the needs of the development	

**Includes the proposed modification to emerging Policy LPRSA310 within the Schedule of Proposed Main Modifications to the Regulation 19 Maidstone Local Plan Review – Post Stage 2 Examination Hearings published for the Planning, Infrastructure and Economic Development Policy Advisory Committee (18th September 2023)*

Housing Mix (including Affordable Housing)

- 6.11. NPPF paragraph 62 explains that the size, type and tenure of housing needed for different groups of the community should be assessed and reflected in policies. Adopted policy SP19 of the Maidstone Local Plan states that the accommodation profiles in the up to date Strategic Housing Market Assessment (SHMA) should be used to inform housing mix. This is also the case for emerging policy LPRSP10(A). The latest SHMA is dated May 2021 and was submitted as evidence for the Local Plan Review. Tables 6.1 – 6.3 below set out the preferred and proposed housing mix.
- 6.12. Adopted policy SP20 requires residential development in Rural Service Centres to provide 40% affordable housing at a tenure mix of 70% affordable rent and 30% affordable home ownership. The 40% affordable

housing requirement is reiterated in the emerging policy LPRSP10(B). However, instead of a 70:30 tenure split the emerging policy requires 75% social and affordable rented and a minimum of 25% first homes.

- 6.13. The proposal is compliant with adopted and emerging affordable housing policies and will deliver 40% of the units as affordable. The Housing Officer proposed a preferred mix for both market and affordable housing as part of their response to the withdrawn application. The mix proposed was 72 market units, 36 units as social affordable or intermediate units and 12 units as first homes. Full details of the location and type of these affordable homes will be provided at Reserved Matters stage. The proposed development will accord with the housing officer requirements or subsequent updates. The final housing mix will be provided at the Reserved Matters Stage to reflect the detailed needs at that time.
- 6.14. NPPF paragraph 62 requires policies to reflect the assessed need of people wishing to commission or build their own homes. Adopted Policy SP19 and Emerging Policy LPRSP10 (A) identify that large development schemes will be expected to demonstrate that consideration has been given to serviced custom and self-build plots as part of housing mix. The proposal does not provide any self-build dwellings. However, should there be an identified need in the area,
- 6.15. Within the Maidstone Council emerging plan document, Policy LPRHou 9: Custom and self-build housing states that the council will support self and custom build development that are in suitable and sustainable locations, conform to the other policies in the plan and meet a set of criteria.

Design, Layout and Access

- 6.16. A key aspect of sustainable development is the good design of buildings and places, as set out in paragraph 124 of the NPPF. The National Design Guide (NDG) expands on this, stating that 'the long-standing, fundamental principles for good design are that it is; fit for purpose; durable; and brings delight'. The NDG requires development to be of high-quality design which take into account the surrounding character and be of appropriate scale, layout, form, scale and appearance.
- 6.17. Adopted Local Plan Policy DM1 sets out local design requirements. Notable design requirements and how the proposed design responds to this are set out below:

- *Accessible designs and layouts as well as accommodating vehicle and pedestrian movements safely;*

The proposed design has a clear hierarchy of routes through the site which provides a clear and legible layout. Key focal buildings are provided at junctions to assist with the definition of the movement strategy. The primary route from Moat Road extends northwards with secondary roads dividing to the east and west. A network of new footpaths will be provided as part of the road hierarchy, further footpaths will be separated from vehicular routes. The pedestrian links will provide access throughout the site and connect to the wider Public Rights of Way such as to the north of the site to Millbank.

Further to this, the proposal seeks to provide a new footpath on Moat Road which will provide a southern pedestrian connection to the village centre. Internal footpaths will connect to Moat Road to the south east. As such, it is considered that the site layout is accessible to all and will provide a range of links to the village.

- *Positive response to the local, natural and historic character of the area, including a response to topography, natural features and setting the built form back from Moat Road and the western boundary;*

The proposal seeks to keep residential built form on the eastern section of the site with open space and landscape buffers providing space between the western and southern boundaries of the site. This respects the surrounding countryside and listed building. Residential development facing onto these buffers will be lower in density and have semi-rural character. SuDS and open space are incorporated into the lower areas of topography. TPOs and significant trees are protected within the design and used as important landscape features.

- *Creation of high quality public realm;*

The public realm provides a network of spaces throughout the entire layout. It includes the buffers to the west and south as well as a green spine within the northern residential area and a green corridor separating the southern and northern dwellings. An illustrative landscaping and public realm strategy will define the function and uses of these spaces. Further details will be provided at the reserved matters stage.

- *Respect residential amenity of neighbouring properties;*

Dwellings will back on to the eastern boundary with a 10m green buffer incorporated between to respect the amenities and setting of adjacent residential properties.

- *Respect the topography and respond to the location of the site and sensitively incorporate natural features such as trees, hedges and ponds worthy of retention within the site;*

The proposed developable areas are intersected by a central open green space at the point in which the topography changes most. This greatest a landscaping buffer which intersects the built from the east to west. This is also a requirement of draft allocation policy LPRSA310.

- *Provide a high quality design which responds to areas of heritage, townscape and landscape value*

The proposal has been informed by extensive heritage and landscaping work. This takes account of the existing built form and the transition from Rural Service Centre to the wider countryside allow for sensitively design parameters.

- *Avoid inappropriate new development within areas at risk from flooding, or mitigate any potential impacts of new development within such areas*

A range of sustainable drainage features includes two attenuation ponds will not only provide attenuation but also provide significant water quality benefits.

- 6.18. Further to this, draft allocation LPRSA310 sets out site specific criteria. Details on how the proposal responds to these requirements are set out in table 6.1.

Landscape

- 6.19. NPPF Paragraph 130 seeks to ensure that developments are sympathetic to the landscape setting but does not prevent or discourage innovation or change when it is appropriate. Further to this, NPPF Paragraph 174 seeks planning policies and decisions to contribute to and enhance the natural and local environment, this includes recognising the intrinsic character and beauty of the countryside.
- 6.20. Adopted policy DM3 relates to the Natural Environment, including Landscape. It seeks to retain a high quality of living that protects positive landscape character. In the context of the emerging Local Plan, Policy LPRSP14A also seeks to protect positive landscape character and requests a Landscape and Visual Impact Assessment (LVIA) where appropriate to take account of the significance of the landscape and the potential effect caused by the change.
- 6.21. In this case, an LVIA has been completed by EDP. It states that significant new areas of formal and informal public open space are proposed, with this including circular walks through meadow land (with visual and biodiversity interest added by the SuDS features), formal play provision, and areas of scrub and woodland within the western parts of the site. This multifunctional green space would not only be a positive resource for new residents but provide features that are largely unavailable within the wider village. The southern boundary also includes a significant area of POS and a wide buffer to Moat Road, helping landscape integration on this boundary.
- 6.22. It is considered that the site forms a relatively 'normal' part of the Headcorn Pasturelands LCA, being closely associated as it is with the existing settlement edge to the north and east, and the road to the south. The proposals commit to providing enhancement in line with the Summary of Actions set out in the LCA, and also the defined Draft Allocation requirements, and although there would be localised harm, the more effective transition between the settlement and surrounding rural landscape means on balance the landscape-scale impacts are considered to be acceptable.
- 6.23. The LVIA states that the visual effects of the proposal would be localised and limited and except for minor roads and a small number of PRoWs which run close to the site, and residential properties which lie directly adjacent to its western, eastern and northern boundaries, views of the site are generally filtered and not especially extensive from public or private locations. The flat undulating topography to the south also has the effect of foreshortening views and makes vertical features more effective at screening/filtering the proposals. There is sufficient layering of vegetation within the surrounding landscape to ensure the extensiveness of visual change would be limited to a small number of local receptors. It is therefore considered that every precaution has been taken to mitigate any impact on the landscape of the proposal.

Open Space

- 6.24. Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities as well as deliver benefits for nature and climate change as set out in NPPF paragraph 98. Planning policies should provide opportunities for further provision in accordance with up-to-date evidence.
- 6.25. Paragraph 6.87 of the adopted Local Plan states "*The council will seek to secure publicly accessible open space provision for new housing and mixed use development sites*" and paragraph 6.92 sets out that open space should be an integral part of design and layout of development. Adopted Policy DM19 further sets out

general standards for all new open space. Emerging Policy LPRINF1 provide revised open space standards. Many of these elements will come forward at Reserved Matters stage. The following standards are considered relevant to this application:

- Be designed as part of the green infrastructure network in a locality, contributing to local landscape character, connecting with local routes and green corridors for people and wildlife;
- Provide a location and shape for the space which allows for meaningful and safe recreation and be sufficiently overlooked by active building frontages;
- Be easily found and accessible by road, cycleway, footpaths and public transport including by those with disabilities;
- Provide clearly defined boundaries with fences or hedges where needed to ensure safety of users.

6.26. Table 6.2 below compares the provision of onsite openspace against the standards set out in emerging Policy LPRINF1.

6.27. Table 6.2 demonstrates that the stated open space requirements of emerging Policy LPRSA310 have been met on site. The requirements required by Policy LPRSP13 and LPINF1 have not been fully provided on site due to the size requirements and nature of the site in terms of topography and landscape setting. A community garden could be provided on the site and secured via the Section 106 agreement if considered appropriate. With regards to the sport provision, it is not feasible to provide the scale/standard of sports requirement in addition to the other policy requirements. Thus, in accordance with emerging Policy LPRSA310 and emerging Policy LPRSP13, a financial contribution towards off-site provision can be made and secured via the Section 106 agreement.

Table 6.2: Open space standards and provision

Open Space type	LPRINF1 Standard (ha/1000 population)	LPRINF1 Standard for 120 dwellings	LPRINF1 Minimum size of facility (Ha)	Policy LPRSA310 Requirements	Onsite provision
Amenity Green Space	0.7	0.20	0.1	No less than 0.8 Ha to include children's play	1.18
Provision for children and young people	0.25	0.07	0.25 excluding buffer		
Publicly accessible outdoor sport	1.6	0.46	To meet the technical standards produced by Sport England or the relevant governing bodies of sport.	Refer to policies LPRSP13 and LPRINF1	0
Allotments and community gardens	0.2	0.06	0.66	Refer to policies LPRSP13 and LPRINF1	0
Natural / semi-natural areas of open space	Make a contribution towards maintaining the borough-wide target of 6.5 Ha of natural/ semi-natural open space per 1,000 head of population.	1.87	Contribution	No less than 1.9 Ha (principle focus on BNG)	2.11
	TOTAL	2.66	n/a		3.29

Trees

- 6.28. NPPF Paragraph 131 recognises that trees make an important contribution to the character and quality of the urban environment and can help mitigate/adapt to climate change. Where possible opportunities should be taken to incorporate new trees within the development and long-term management measures are in place. Furthermore, existing trees should be maintained wherever possible.
- 6.29. Adopted policy DM3 seeks to protect veteran trees, trees with significant amenity value and important hedgerows. Where appropriate an Arboricultural assessment is required. This is reiterated in Emerging Policy LPRS14A. Draft Allocation Policy LPRSA310 requires the proposal to respect and protect the TPO trees within the site and adjacent to boundaries.

- 6.30. Aspect Arboriculture has undertaken an Arboricultural Impact Assessment for this proposal. Arboricultural input has been provided during design of the development, which has served to minimise necessary tree removals, and to focus the effect on low quality components of the tree stock. Subsequently, all unavoidable removals to introduce development to the allocated site are low quality (category C) only.
- 6.31. The Parish Council requested additional tree planting as part of their comment on the withdrawn application. The proposals will be accompanied by a scheme of landscaping and provide the opportunity to secure betterment to the tree stock, particularly the introduction of trees within areas of public open space. The proposed replacement plantings will serve to complement the retained boundary tree stock, whilst also securing the softening of the proposed development.
- 6.32. Subject to ongoing arboricultural input during detailed design of the proposals, including levels, drainage and services, and the implementation of safeguards for protecting retained trees during construction, the proposed development can be introduced whilst ensuring the confident protection of retained trees.
- 6.33. Whilst the retention of significant trees where possible is required by MBC's relevant Policy, none of the tests preclude the removal of trees to implement development. The tree removals are required to introduce residential development to the allocated site. The introduction of the proposed development is subsequently considered to accord with MBC's adopted Policies and NPPF paragraph 180c. Pursuant to the Council's preference to ensure confident tree retention during development, a detailed Arboricultural Method Statement should be prepared, which expands on Appendix C.

Transport and Access

- 6.34. NPPF paragraph 105 seeks to actively manage the patterns of growth by locating developments in areas that can be made sustainable through limiting the need to travel. Paragraph 112 requires development proposals should prioritise pedestrian and cycle movements within the scheme and to neighbouring areas. The layout should avoid conflict between pedestrians, cyclists and vehicles. NPPF paragraph 111 states:
- Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*
- 6.35. The emerging Local Plan sets out that new development in Maidstone is required to direct development to areas with travel choice and bring forward mitigation measures aimed at encouraging journeys to be taken by more sustainable modes, as well as increasing capacity where it is needed. Specifically, the emerging Policy LPRSP12 for Sustainable Transport states that the transport system should support the growth projected by Maidstone's Local Plan and facilitate economic prosperity.
- 6.36. Policy LPRSP13 of the emerging Local Plan: Infrastructure Delivery, requires the provision of infrastructure needed to support growth. Key infrastructure requirements for Headcorn are set out in emerging Policy LPRSP(6) including Improvements to highway and transport infrastructure, junction improvements, a variety of measures to improve sustainable transport infrastructure and improvements to pedestrian and cycle access.
- 6.37. The draft allocation policy for Moat Road LPRSA310 states that vehicular access shall be via Moat Road, with junctions and sight lines designed to appropriate capacity and safety standards. Development will be subject to the provision of acceptable off-site pedestrian and cycle connectivity to the A274. Any footways

shall be designed to ensure that there are no adverse or ecological impacts and maintain the rural character of Moat Road.

- 6.38. The Policy also requires that development should respect and enhance the setting of any PRow within or adjacent to the site. Furthermore, appropriate safe pedestrian access onto Maidstone Road will be required via the northern boundary of the site.
- 6.39. A transport assessment has been completed at the Site and states that the access. Pedestrian/ cycleway access to the site will be via a primary access onto Moat Road via a new simple priority T junction as shown on Drawing 20472-03-3 A. Moat Road's character is rural to the west and semi-rural as it enter the village to the east. The hedgerows and trees adjacent to the road will not be affected by the offsite S278 road changes which are proposed.
- 6.40. Visibility splays are based on recorded 85th percentile speeds from the ATC results, which represents the speed for which only 15% of traffic exceeds. Therefore, this presents a higher starting position than using the average speed of traffic and is the required speed for assessing visibility splays.
- 6.41. The site also benefits from a right of access along an existing track to the north onto the A274 which would provide pedestrian/ cycle connectivity and emergency access.
- 6.42. The KCC Highways comment received in response to the withdrawn application have been considered within the supporting Transport Assessment including the following:
- A new footway scheme that has been subject to independent road safety audit and with complimentary traffic management features will be provided from the site to the existing footway on Moat Road near to Kings Road.
 - New traffic surveys were undertaken in March 2023 and the access and visibility have been designed to meet the requirements of the recorded speeds of traffic.
 - Road Safety Audit Response is included in the TA at Appendix E.
 - With regards to pedestrian movement, KCC requested details on the footpath access to the site from Moat Road. To ensure that the character of Moat Road is maintained in addition to hedgerow habitats, the proposal seeks the pedestrian access into the site to enter at the southeast corner and then continue into the site.
 - The TRICS databased used to inform the Transport Assessment was v7.10.1 online and consider a 5 mile radius.
 - Personal Injury Collision (PIC) data has been received from Kent County Council for the 5- year period of 1st January 2018 to 31st December 2022.
 - Necessary street lighting will be provided with the details to be agreed with KCC during the technical approval process for the S278 highway works.
- 6.43. Further details are set out within the supporting Transport Assessment.

Parking standards:

- 6.44. The rise in electric car ownership has been seen since the adopted Local Plan was published in 2017. As such emerging Policy LPRSP12 states that new development should support the provision of and improvements to Electric Vehicle charging infrastructure.
- 6.45. The new Building Regulations Part S aims to futureproof homes and buildings via the installation of charging points for electric vehicles. Building Regulations Part S provides a requirement for new homes and existing homes undergoing large renovations (of 10 or more dwellings) to have facilities for charging electric vehicles at home that may be parked on associated parking spaces at that home. The proposal will be compliant with these new building regulations and any future iterations if they exceed the policy requirements. As such, each home will be provided with an electric vehicle charging point.
- 6.46. As this application seeks only outline planning permission, specific parking arrangements are not detailed. However, the proposal has more than sufficient space to enable it to be compliant with the latest parking standards.
- 6.47. The Kent Design Guide Review: Interim Guidance Note 3 summarises the required parking at new residential sites. The standards are summarised in Table 6.4 below. The illustrative masterplan has been designed to accommodate parking. Full details of the parking strategy will be provided at reserved matters stage.

Table 6.4: Kent Design Guide Review: Interim Guidance Note 3.

		Description
1&2 bed houses	Standard	1.5 spaces per unit
	Form	Allocation of one space per unit possible
3 bed houses	Standard	2 independently accessible spaces per unit
	Form	Allocation of one or both spaces possible
4+ bed houses	Standard	2 independently accessible spaces per unit
	Form	Allocation of both spaces possible
Visitor Parking	Standard	0.2 per unit
	Form	On-street areas
Garages are additional to amount given above only.		

Drainage

- 6.48. NPPF Paragraph 167 explains that proposed developments should ensure that flood risk is not increased elsewhere and should be supported by a site-specific Flood Risk Assessment. Major development should also incorporate sustainable drainage systems (SuDS).
- 6.49. Policy H1 of the Maidstone Local Plan relates to the Housing site allocations, and requires that appropriate surface water and robust flood mitigation measures will be implemented where the site coincides with identified flood zones 2 and 3 shall be subject to a flood risk assessment, including sites in Flood Zone 1 greater than 1 ha in area, and shall incorporate sustainable drainage systems.

- 6.50. The emerging site allocation Policy LPRSA310 for Moat Road in the flood risk/drainage section states that the site should be designed to ensure that it has a positive impact on the River Beult catchment, and does not worsen local flood risks on Moat Road. It is noted that the main vehicular access to the site is through Flood Zone 3, which covers Moat Road. As such the development will be dependent upon acceptable flood safety measures being agreed with the EA, and to this end an alternative emergency access is provided to the north accessed off Mill Bank. This will be controlled by demountable bollards with security keys available on site to be used in a flood event. Ordinarily this access will provide a pedestrian and cycle access route only.
- 6.51. The extreme south and southeast of the site are located in Flood Zones 2 and 3 associated with the River Beult and Hoggs Stream. The development area of the site has therefore been limited to the area of the site located in Flood Zone 1, the lowest probability of fluvial flooding.
- 6.52. Should flooding of Moat Road occur during an extreme flood event, a secondary emergency site access is provided to the north of the site to ensure that the site remains accessible.
- 6.53. With respect to surface water drainage, inevitably there will be an increase in hardstanding and surfaces on the site once completed, which under normal circumstances would increase the amount of run off from the site and potentially cause flooding issues further downstream. However, the indicative surface water drainage strategy has been designed to ensure that offsite surface water discharges will be reduced post-development.
- 6.54. Onsite attenuation for the 100 year storm with an appropriate allowance for climate change will also be provided. This attenuation will be provided in a range of sustainable drainage features, which will not only provide attenuation but also provide significant water quality benefits.
- 6.55. In the withdrawn application dated November 2022, KCC Flood and Water Management raised no objection. However, they did request further information at detailed design stage. The proposed SuDS features (including permeable paving, swales and detention basins) are designed to provide the required storage volume to retain the 1 in 100 plus 45% climate change event. These SuDS features will provide significant water quality benefits as runoff will pass through a treatment train of at least two features. The Indicative Surface Water Strategy at Appendix J of the supporting Flood Risk Assessment includes more information with this regard.

Ecology

- 6.56. Chapter 15 of the NPPF seeks developments to minimise the impacts on biodiversity whilst also providing measures to achieve a net gain in biodiversity. Local Planning Authorities should apply the principles set out at NPPF paragraph 180 when determining applications. Fundamentally these principles state that development whose primary objective is to conserve or enhance biodiversity should be supported.
- 6.57. The emerging site allocation Policy LPRSA310 for Moat Road states that a phase 1 habitat survey will be required, which may as a result require on and/or-off site mitigation for the existing habitat of local fauna/flora. Existing tree/hedgerow margins should be retained/enhanced in order to provide the opportunity for biodiversity habitat creation/enhancement.

- 6.58. The Environment Act will introduce a requirement for new development to deliver 10% Biodiversity Net Gain. The Council are keen to demonstrate its commitment to enhancing biodiversity in the borough to align with the Climate Change and Biodiversity Action Plan, and viability testing has indicated that the delivery of 20% net gain can be achieved. Developments will be expected to deliver a minimum of 20% biodiversity net gain as measured using the latest Natural England Biodiversity metric. The Policy also states that development will be subject to a site-wide strategy to incorporate an appropriate level of biodiversity net gain in accordance with national and local policy.
- 6.59. Policy LPRSP14A of the emerging plan states that the natural environment must retain a high quality of living, protect and enhance the environment, and to be able to respond to the effect of climate change. This policy also states that a minimum of 20% Biodiversity Net Gain is required.
- 6.60. This application is supported by an Ecological Appraisal and Biodiversity Net Gain Assessment. The reports confirm that an ecological assessment of the site has been undertaken. The Surveys conducted have established that the site is dominated by habitats not considered to be of ecological importance, whilst the proposals have sought to retain those features identified to be of value. Where it has not been practicable to avoid loss of habitats, new habitat creation has been proposed to offset losses, in conjunction with the landscape proposals.
- 6.61. This Ecological Appraisal provides further clarification on comments raised by KCC Ecology during the consultation of the withdrawn application. This is with particular regard to:
- Great Crested Newts: KCC Ecology required a countersigned DLL enquiry form to be submitted. This has been submitted and agreed.
 - Breeding birds: Updated site survey visits were undertaken in April to July 2023 and identified Greenfinch *Chloris chloris*, Skylark, Linnets and Yellowhammers. Three of the species are hedgerow breeding birds and given the retention of hedgerows in the site will not be subject to adverse effects. A single singing male Skylark was observed in the northern field on the earlier July survey date. The fact that this was a single skylark and was only observed once during six bird surveys would indicate that this species is not breeding on site. In their second response to the withdrawn application KCC Ecology stated that Skylarks were likely absent.
 - Reptiles: The site survey identified low populations of slow-worm, Common Lizard and Grass Snake. Several of these are located on the eastern site boundary. The Ecological Appraisal recommends that these are translocated prior to construction work.
 - Bats: Mitigation with regard to bats is set out in the Ecological Appraisal and includes the incorporation of bat boxes. Careful removal of any roofs or other structure that may have the potential to support or conceal roosting bats will be required. It is recommended that this work is carried out under a protected species license.
- 6.62. The biodiversity net gain assessment has calculated the data from the baseline habitat survey work and the proposed habitat enhancement and creation works. The calculation indicates that the development will result in 90.18% net gain in area habitats and 20% net gain in hedgerows. This far exceeds the policy requirement.

Heritage and Archaeology

- 6.63. Paragraph 189 of the NPPF explains that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. In weighing an application that directly or indirectly affects non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset, as set out in NPPF paragraph 203.
- 6.64. If a site has the potential to include heritage assets with archaeological interest, local planning authorities should seek an appropriate desk-based assessment to be submitted with a planning application as set out at NPPF paragraph 194.
- 6.65. Policy LPRENV 1 of the emerging Local Plan requires applicants to ensure that new development affecting a heritage asset incorporates measures to conserve and where possible enhance the heritage asset and its setting. It is noted that the land at Moat Road does not lie within a Conservation Area, nor does it contain a listed building or a registered park and garden. However, the Moat is a Grade II listed building which lies to the south east outside of the site.
- 6.66. The illustrative layout has been carefully designed to ensure that an appropriate spatial buffer is provided between this listed building and the new built form which is proposed as part of this development scheme. Accordingly, the immediate setting of this listed building is protected. Some farm buildings relating to Moat Farm lie within the south-eastern area of the site. These have been assessed through a site visit, and are considered to possess minimal intrinsic heritage significance, although one may be considered to be curtilage Listed. They are now in a very dilapidated state, and do not warrant retention within the proposed scheme.
- 6.67. The proposed development respects the setting of the Grade II Listed The Moat, setting development back from the frontage of Moat Road, behind landscaping, and preserving any remains of the moat feeder pond in situ.
- 6.68. The associated buildings and farmland within the site are visually separated from the Listed building by intervening vegetation. The loss of the small level of historic illustrative interest that they contribute to the heritage significance of The Moat will cause less than substantial harm at the low end of the spectrum. Further farmland will remain to the south and south-west of the asset.
- 6.69. The heritage and archaeology report has updated been updated following comments from the Senior Archaeological Officer for KCC which requested an archaeological Desk Based Assessment and a special assessment of the Royal Observer Corps underground monitoring post. With regards to the impact on the Archaeology of the site, a geophysical survey of the site has been undertaken and did not identify any anomalies potentially indicative of significant archaeological remains. Based on the survey results and recorded heritage in the vicinity, the Site is considered to have low potential for significant archaeological remains from the prehistoric and Romano-British periods. Further investigation into the former Royal Observer Corps underground monitoring post has been undertaken since the application in 2022. The supporting Heritage Assessment The supporting Heritage Assessment has been removed and should not be a constraint to the site.
- 6.70. This information has been submitted in the attached document to address the concerns from the Archaeological Officer at KCC.

Air Quality

- 6.71. NPPF Paragraph 186 sets out that planning policies and decision should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants. If there are opportunities to improve or mitigate air quality these should be considered at the plan making stage.
- 6.72. The emerging plan puts a specific emphasis on the importance of improving air quality. Policy LPRTA1 is with regards to air quality and outlines Maidstone's approach to air quality management. Furthermore, the Maidstone Low Emission Strategy (2017) combines the air quality action plan and low emission strategy into one document and identifies key partners and their responsibility for delivering measures to improve air quality in the exceedance areas and across the borough. The emerging plan now states that the focus needs to be placed on achieving modal shift to walking, cycling and public transport and low emission transport.
- 6.73. The Maidstone Borough Council Air Quality Planning Guidance provides guidance regarding whether the proposed development is likely to have a negative effect on air quality, how to measure air quality impacts and how to secure mitigation measures which will address the measured air quality impacts.
- 6.74. Notably there are no Air Quality Management Areas (AQMA's) within the local area and therefore there will not be any impact on any designated AQMAs as a result of these proposals. The emerging local plan notes that there has been a significant improvement in air quality in the borough since the adoption of the previous local plan and cites more efficient engines, cleaner fuels and the uptake in electric vehicle ownership. Emerging policy LPTRA4 sets out requirements for the provision of active and passive electric vehicle charging infrastructure with residential development schemes and these proposals will be designed to meet these standards and so will support the continuation of this upward trend in air quality.
- 6.75. An Air Quality Assessment has been undertaken by RSK and supports this application. This finds that the overall air quality impact of the development is 'not significant'. This assessment also sets out appropriate mitigation measures at section 6.

Noise

- 6.76. NPPF Paragraph 174 (e) requires planning decisions to contribute to and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of noise. Further to this, NPPF paragraph 185 states that new developments should mitigate and reduce to a minimum potential adverse impacts resulting from noise and avoid significant adverse impacts on health and quality of life.
- 6.77. Emerging Policy LPRSP15 Principles of Good Design state that proposals should respect the amenities of occupiers of neighbouring properties and uses, and should provide adequate residential amenities for future occupiers of the development by ensuring that proposals do not result in excessive noise. has been undertaken to establish the baseline noise levels across the site, comprising of unattended measurements throughout continuous daytime and night-time periods between 14 and 19 September 2022.
- 6.78. A site suitability assessment, to the requirements of BS 8233: 2014/WHO, 1999 and Mid-Kent District Council has been undertaken to determine potential internal and external noise levels at locations across the development site.

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- 6.79. Predicted levels, in conjunction with highest maximum noise levels, are of a magnitude where a standard specification double glazed system to the building façade, providing a minimum sound reduction of 19 dB Rw+Ctr and accompanied by a suitable ventilator, would be required to meet the internal design targets within BS 8233: 2014/WHO, 1999 during daytime and night-time periods (at a worse case along the southern boundary of the site).
- 6.80. Based on the simplified method of assessment, there are no areas across the site deemed as being of high risk of overheating. External noise levels would also not exceed the highest overheating SOAEL limits within the AVO Guide nor the AD-O. It is recommended during the detailed design stage that input be sought from the wider design team to identify potential areas of overheating risk to ensure appropriate mitigation options are explored (where necessary) in the form of compliment ventilation, architecture and structural design strategies.
- 6.81. External noise levels are likely to comply with the upper design target of 55 dB LAeq,16hr, as specified within BS 8223: 2014. Similarly, an assessment of the operational substation (in accordance with BS 4142:2014+A1: 2019) indicates a low impact during both daytime and night-time periods.
- 6.82. Therefore it is considered that the proposal will comply with the requirements set out in the Local Plan policy and the NPPF.

Minerals and Waste

- 6.83. In the previous application submitted in November 2022, an objection was received by the County Council's Minerals and Waste Planning Policy team with regards to the proposed development on the safeguarded mineral deposit of the Paulina Limestone of the Weald Formation. The map extracts below show the application site and the relevant part of the Maidstone Borough Council. Mineral Safeguarding Areas Proposals Map of the Kent Minerals and Waste Local Plan (KMWLP) 2013-30 (Early Partial Review) 2020.
- 6.84. In response to the comments from KCC Minerals and Waste team a minerals assessment was requested and this was supplied to MBC on 1st February 2023. This document has been submitted alongside this application and details how there is no merit in commercial extraction of the mineral prior to development in accordance with Requirements 1 and 2 of Policy DM7 of the Kent Minerals and Waste Local Plan (2013-2030).

Lighting

- 6.85. NPPF paragraph 185 states that new developments should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 6.86. Policy DM8 of the adopted Local Plan relates to external lighting. The Policy has been retained and amended in the emerging Local Plan under Policy LPRQ&D 2: External lighting. The Policy States that development is demonstrated by illuminance contour diagrams that the minimum number, intensity and height and timing of lighting necessary to achieve its locationally appropriate purpose is proposed. The proposed scheme at Moat Road must therefore carefully consider the impact of lighting on the surrounding area.
- 6.87. Proposed development will have a negligible impact on the area surrounding the site. Although light spill from the site will increase in some locations the impact of the new development will be negligible in these locations.

- 6.88. The assumed luminaires to be installed on the site have minimal light spill due to housings that direct the light down and minimise unwanted sideways illumination. This results in a development that will have little or negligible impact on the surrounding area in line with the SLL recommendations.
- 6.89. In summary it has been shown that the proposed development will have an insignificant effect on the immediate environment with respect to lighting pollution. Although light spill has increased illuminance levels at some locations, the potential increase in illuminance is considered negligible.

Planning Balance

6.90. Paragraph 8 of the NPPF also sets out three overarching sustainability objectives. In respect of this proposal the following observations are made in relation to these objectives:

- **Economic Objective:** The proposal will provide new homes which will encourage local employment opportunities. Moreover, job opportunities will be created during the construction of the development and through the maintenance and management subsequent to the occupation of development.
- **Social Objective:** The proposal provide new homes to meet the needs of the local areas. The new homes are set within a well landscaped proposal with access to amenity open space from the front door. New pedestrian and cycle connection provide active travel measures into the rural service centre allow residents access to services and facilities to meet their day to day needs.
- **Environmental Objective:** The proposal is the result of a large technical consultant team. It ensures there is limited impact to the natural, built and historic environment. The layout seeks to make the most effective use of land by optimising the capacity to 120 dwellings. Significant benefits to biodiversity are proposed as well as enhancing the existing landscaping features to mitigate any significant landscaping effects. The incorporation of a sizeable buffer of open space on the western side of the development scheme ensures a softer transition to the countryside beyond and this is further reinforced by a lower density character area within the development itself where it adjoins this landscape buffer.

6.91. Given the above the proposal is considered to fully support the purpose of the planning system – to achieve sustainable development.

6.92. With regards to decision making, The NPPF places a presumption in favour of sustainable development. Paragraph 11 sets out that:

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 6.93. In summary, the proposal seeks outline consent for up to 120 dwellings with a substantial amount of benefits attached to it. These include:
- 120 new homes of which 40% will be affordable housing assisting in meeting the Council's housing need;
 - 3.26Ha of open space. As part of the amenity usage, a children's play area will be provided.
 - 90.18% net gain in area habitats (+10.86 habitat units) and 20% net gain in hedgerows (+4.14 hedgerow units) with regards to BNG;
 - Four character areas which seek to respond to the edge of rural service centre location;
 - Upgrades to the highways to provide new footways into the village centre;
 - Safe and secure access suitable for at least 120 dwellings;
 - Protection of important landscaping features include TPO, mature trees and hedgerows;
 - Limited landscaping impacts mitigated by new tree and hedge plant amongst other mitigation measures.
 - SuDS features which ensure surface water is drainage sufficiently as well as protecting water quality.
- 6.94. As demonstrated within this section, the proposed development is compliant with national and emerging local policy. With regards to the adopted policy, it is noted that the proposal is compliant other than the absence of a site allocation. Whilst it is noted that the emerging Local Plan does not form part of the 'up-to-date development plan, it is considered that significant weight can be provided to the emerging allocation in accordance with NPPF paragraph 48 (see paragraph 6.4 of this Planning Statement).
- 6.95. Given the above, it is considered that MBC should take account of the significant benefits attached to this development in light of a significantly advanced emerging Local Plan and not delay the approval of the proposal.

7. Conclusions

7.1. This Planning Statement has been prepared by Savills, on behalf of The Master Fellows and Scholars of the College of Saint John the Evangelist in the University of Cambridge and Catesby Strategic Land Ltd. It accompanies an outline planning application at Moat Road, Headcorn. Specifically, this application seeks:

Outline application (with all matters reserved except access) for the development of up to 120no. dwellings (Use Class C3) including demolition of existing buildings, means of access into the site from Moat Road (not internal roads), associated highway works, provision of public open space, emergency / pedestrian access to Millbank and associated infrastructure including surface water drainage (with related off site s278 highway works to Moat Road).

7.2. This Planning Statement has demonstrated that the proposed development is acceptable in planning terms and in accordance with NPPF paragraph 11 should be approved without delay. In summary, the proposal:

- The site has been allocated for residential development under emerging policy LPRSA310 for approximately 110 dwellings. The weight in which this can be awarded has been increased given the late stage of the emerging Local Plan particularly given the examination of the allocation of the site by the Inspector which resulted in very minor amendments to the policy wording.
- This application proposes a scheme comprising 120 new dwellings to ensure that the best use is made of this site to provide much needed market and affordable housing. Accordingly, the scheme will provide 48 affordable homes (40%) with the final tenure split to be agreed with the Council's housing officer. The final unit mix will be determined within a detailed reserved matters application(s).
- This application follows an earlier withdrawn application (ref: 22/505616/OUT) and this application seeks to address comments made on that application.
- The proposals have been informed by pre-application engagement with the Council.
- Movement of pedestrian, cyclists and vehicle has been a fundamental element which has informed the layout of the proposal. The layout of the site will provide access to services within Headcorn as well as to the wider countryside.
- A number of ecological enhancements have been proposed to minimise the impact on existing ecology on the site, and a robust scheme of biodiversity net gain is proposed which demonstrates that the policy requirements can be fully provided on site.
- A suite of technical reports accompanies the application and demonstrate how the proposal is acceptable from each technical aspect.
- Detailed design of the proposal will be provided within subsequent Reserved Matters application(s).
- Accordingly, the proposed development is considered to meet the requirements set out in the Local Development Plan and the NPPF.

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