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# Representations to the Maidstone Borough Council Regulation 18 Local Plan Consultation

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## **Land North of Moat Road, Headcorn**

Prepared for:

Catesby Estates PLC

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## 1. Introduction

- 1.1. These representations have been prepared on behalf of Catesby Estates PLC (herein referred to as “our client” or “Catesby”), in relation to the Land North of Moat Road in Headcorn and are submitted in response to the consultation on the Maidstone Borough Council (MBC) Regulation 18 Local Plan Review. The consultation opened on Friday 19 July 2019 and closes on Monday 30 September 2019.
- 1.2. The current consultation comprises the following documents:
- The Local Plan Review Technical Document - Scoping Themes & Issues Consultation July 2019
  - The Local Plan Review Summary Document - Scoping Themes & Issues Consultation July 2019
- 1.3. The current Local Plan was adopted by MBC in October 2017. Policy LPR 1 requires that a review takes place shortly after adoption to review the housing needs, specific allocations, housing land, employment land and transport infrastructure. The target adoption date for the Local Plan Review is April 2021. This consultation represents the first consultation in the Local Plan Review process.
- 1.4. As part of the current consultation, MBC is seeking views on four options for growth. These are:
- A. Maidstone focus** – focusing significant additional growth in and at the edge of the town
  - B. Dispersal** – spread growth and its benefits into key locations across the borough, including Maidstone. (67%) Rural Service Centres and Large Villages (24%) and sites in the countryside (8%).
    - B.1. Dispersal option 2** - A variant dispersing new housing to a fourth tier of villages also; and
  - C. Planned new settlements and major extensions (‘garden suburbs’)** – placing emphasis on new settlements and major extensions to achieve the right types of growth for the borough.
- 1.5. As set out in this representation, MBC can only reasonably rely on option B or B1 to deliver the homes and growth needed over the new plan period. In this regard, the adopted Local Plan sets a housing requirement of 883 new homes per annum (dpa) up to 2031. The Local Plan Consultation states that 1,236 new homes per year will be required in order to meet the full housing needs of the Borough. This is an increase of 353 homes per year from the adopted target, or 40%, and reflects the Government’s Standard Method figure. MBC advise that this requirement will be applicable from 2022, hence the need to review current allocations and seek new allocations to cover the end of the plan period and further beyond to 2037.
- 1.6. The Land at Moat Road has been actively promoted to MBC through the ‘Call for Sites’ for a residential scheme of 150 homes. It comprises 7.26 hectares (ha) of agricultural land on the western edge of Headcorn (see Appendix A). The site is considered suitable, available, achievable and deliverable for this quantum of development.

- 1.7. Headcorn is recognised as a 'Rural Service Centre' in the adopted local plan, and this is reiterated in the Draft Local Plan Consultation. These centres are considered to be the most sustainable settlements in the borough outside of Maidstone. The site is therefore in a prime location for development and would ensure that much needed new homes are capable of being provided in a location which already is regarded as sustainable.
- 1.8. This representation examines the Draft Local Plan consultation document and seeks to address relevant questions in light of the promotion of the site for allocation. As part of this, comments are provided on the three spatial approaches set out above. A summary of the site and its location is also provided, and where applicable, recommendations are included for further work to assist the LPA in preparing the Local Plan Review.
- 1.9. Whilst not all questions are addressed in this response, Catesby and Savills reserve the right to comment further on all elements of the emerging Local Plan Review including its evidence base, at future consultation stages.

## 2. The Site

### Site Context

- 2.1. The land north of Moat Road, herein referred to as “the site” is situated on the western edge of a Headcorn and comprises 7.26 hectares (ha) of agricultural land. It lies outside of but immediately adjacent to the settlement edge and to the immediate south of Catkins Garden, a development of 62 homes that is currently being built out by a national housebuilder.
- 2.2. The site is otherwise bounded by Moat Road to the South, residential back gardens of Mill Bank to the East, and agricultural land to the west. A number of dwellings and farm buildings are situated to the north west (off Black Mill Lane) and an electricity substation sits to the south west corner of the site off Moat Road.
- 2.3. 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. The High Street of Headcorn is within 800m of the site and is reasonable walking and cycling distance for new residents. For context, a site location plan is attached at **Appendix A**.
- 2.4. Headcorn is a well serviced village with a number of services and facilities and is recognised in the currently Local Plan as a Rural Service Centre. Such locations are regarded as sustainable and sit below only Maidstone town centre and urban area 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.
- 2.5. 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 Canon 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 also crosses the site.
- 2.6. With regards 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.

- 2.7. 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). This is located to the south east of the site. 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. There are a number of TPOs on the site within the central tree belt.
- 2.8. In terms of the wider area, it is relevant to note that in addition to land to the north at Catkins Gardens, which is currently being built out for 62 homes, MBC has previously allocated a site to the east of Mill Bank for 220 units. This site is a short distance away from land at Moat Road and does provide a clear indication that MBC regards this area as sustainable, accessible and suitable for additional housing development.

#### **Development Opportunity**

- 2.9. The site provides an opportunity to deliver much needed new homes in this location and is capable of accommodating circa 150 new dwellings in a range of sizes, types and tenures. It is well enclosed by existing defensible features, notably existing residential development and the highway network. It is currently anticipated that the development will be provided within the eastern part of the site, close to the existing residential development, and allowing a larger area of green space and landscape buffer to be provided to the west. An additional green buffer and SUDS pond would also be provided in the south eastern corner. The SUDS pond would be within flood zone 1 but lie 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.
- 2.10. The main access into the site will be via a new entrance onto Moat Road, with a range of pedestrian links provided to the wider area and connections to the existing footpath network. An emergency vehicle access would also be provided towards the north, which can also serve as a further pedestrian and cycle link onto Mill Street and to the surrounding area.
- 2.11. The site, is capable of providing a high quality new residential development in this sustainable, accessible location. 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.
- 2.12. Further details of the opportunities at the site are contained in the accompanying Vision Framework document (**Appendix B**).

### 3. Policy Position

- 3.1. At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development. Local Authorities should produce up-to-date plans that positively seek to reflect this and address the needs of the area whilst allowing flexibility to adapt to changes during the Plan period.
- 3.2. The adopted Local Plan was found to be sound in July 2017 and subsequently adopted in October 2017. The adopted Local Plan sets out the planning policies and site allocations between 2011 and 2031. During this period, MBC are required to make provision for 17,660 new homes. This equates to 883 dwellings per annum.
- 3.3. Headcorn is recognised as a “Rural Service Centre” within the adopted MBC Plan. Such locations are recognised as providing a good range of services which serve the surrounding areas as well as having frequent public transport connections to surrounding settlements. Rural Service Centres are second only to Maidstone Town Centre and Urban Area in the settlement hierarchy.
- 3.4. Policy LPR 1 of the adopted Local Plan requires that a review of the Plan takes place shortly after adoption. During this review MBC will reassess the local housing needs, specific allocations, housing land, employment land and transport infrastructure. The target adoption date for the review is April 2021.
- 3.5. With specific regards to housing needs, the Government’s published Standard Method indicates a need for 1,236 dwellings per annum (dpa), whereas the current adopted target is for 883dpa. This is a considerable difference, amounting to an increase against the current target of 353 dpa or 40%. It is essential that the Local Plan Review includes sufficient allowance to help address the housing needs and in order to achieve this, it is essential that additional sites are identified and allocated to ensure continued supply and delivery.

## 4. Evidence Base

- 4.1. MBC has not published any evidence base documents as part of this consultation. However, a consultation was undertaken earlier this year on the Sustainability Appraisal for the Local Plan Review.
- 4.2. It is anticipated, and expected, that these will be made available at the next consultation stage, whether a further Regulation 18 or a Regulation 19 Plan, and to this end, MBC has confirmed within the consultation Plan that the following documents will be prepared and consulted upon during the plan making process:
- Sustainability Appraisal incorporating Strategic Environmental Assessment
  - Strategic Housing Market Assessment
  - Economic Development Needs Study (includes retail assessment)
  - Strategic Land Availability Assessment
  - Open Space Assessment
  - Transport assessments and modelling
  - Air quality assessment and modelling
  - Strategic Flood Risk Assessment
  - Sports Facilities Assessment
  - Landscape Character Assessment
  - Habitat Regulations Assessment
  - Gypsy & Traveller and Travelling Showpeople Assessment
  - Viability Assessment
  - Minerals Assessment
- 4.3. It is essential that such documents are made available for comment as part of the local plan process, and therefore both Catesby and Savills reserve the right to comment on all evidence base documents as and when they are made available.



## 5. Observations on the Regulation 18 Local Plan

- 5.1. There are eight Overarching Questions (“OQ”) in the draft plan which MBC are seeking initial comments on.
- 5.2. In addition, the Plan also includes a number of focused, or Themed Questions (“TQ”), specific to topics raised throughout. In some instances the responses to either an OQ or TQ overlap. In such instances, a combined response is provided below and each of the relevant questions is stated.
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### Overarching Questions

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#### ***OQ1. What can the Local Plan Review do to make the growth we need ‘good growth’?***

- 5.3. Sustainable development is at the heart of the NPPF. In relation to the NPPF ‘good growth’ should be considered as sustainable growth. To achieve sustainable growth and development, the three overarching objectives (social, economic and environmental) need to be pursued through the preparation of the Local Plan Review. In a broader terms, this means that future development plans should be considered as a whole. The Council must produce a robust evidence base to analyse how growth can be accommodated throughout the borough and how it will achieve each objective. Alternative solutions should be considered and justification for the preferred approach must be demonstrated.
- 5.4. Good growth will comprise a range of uses and developments, of varying sizes and complexities, but overall good growth meets all identified needs in any given area. In respect of housing, this means that MBC must ensure that the new Local Plan Review is fully capable of delivering 1,236 homes per year, through a variety of large and small allocations.
- 5.5. Whilst MBC states that this target will not apply until 2022 and that it will only need to “top up” the housing delivery between 2022 and 2031, it is fundamental to recognise that the figure is a minimum and not a ceiling and that early delivery will be essential to achieving the required level of growth over the plan period. This means that MBC should not wait until 2022 to secure housing delivery over the current 883 dpa requirement, but should be identifying sites now that can commence on site from 2022. This is also essential to ensure that the Council allows for sufficient flexibility in the Plan to accommodate housing needs and allow for choice in the market through delivery of a higher number of homes than the minimum expected. The currently local plan does not extend beyond 2031 and therefore MBC must also identify longer term sites for delivery in order to address the identified needs of the borough and further allow for the necessary flexibility and market choice.

- 5.6. As mentioned, good growth can be achieved through the allocation of a range of sites, both in terms of their sizes and their locations. In areas which are, or can be made sustainable, it is reasonable for a larger number of homes and development sites to be identified where these can support communities. In this instance, the Land North of Moat Road would provide an excellent opportunity to meet the objective of “good growth”. It is located in a sustainable area, with good and immediate access to a range of local facilities, services, education and public transport. The development of the site would not only enable future residents to make use of these facilities but also help to support their long term use, viability and vitality helping to secure long term sustainability of this area. This would accord with the aims and aspirations of the NPPF.
- 5.7. Furthermore, the detailed analysis which was submitted as part of the ‘Call for Sites’ and the Vision Framework document is attached at **Appendix B**. This identifies that whilst the site is within a landscape of local importance, any development that would come forward would be able to mitigate any potential landscape and visual impacts. No further significant constraints are considered to outweigh the social benefits of providing new homes, enhanced open space as well as highways improvements, as detailed with the Vision Framework. This site will provide ‘good growth’ in a sustainable location.

***OQ3 – How can the Local Plan Review ensure community facilities and services are brought forward in the right place and at the right time to support communities?***

***OQ5 - What infrastructure and services, including community services and facilities, do you think are the most important for a successful new development?***

- 5.8. MBC should plan positively for the provision and use of community services and facilities in line with paragraph 92 of the NPPF. To achieve this a robust evidence base should be produced to identify where there is insufficient services and facilities in the area, as required by the Planning Policy Guidance (PPG) [ID:61-036-20190723].
- 5.9. Whilst it is understood that new services and facilities will be required over the Plan Period, MBC should also recognise the existing infrastructure and services, and seek to focus development in areas which benefit from such provisions. Developments can then provide further support and enhancement of these local services, potentially also bringing new businesses to any local area. With regards to Headcorn, for example, the village is currently well served by a number of services and has good transport infrastructure. These features currently serve the community and the wider area as a rural service centre. New homes in and around the village would bring additional footfall to the town and public transport facilities, encouraging new and improved services to be provided for a larger catchment, and supporting the viability of this centre in the longer term.

- 5.10. Development at the Land north of Moat Road would provide growth in a location with a number of existing facilities. The development could provide further benefits and enhancements to the local area via financial contribution or direct provision. This would include a new pedestrian footpath on Moat Road. The development would also provide new open space, play areas and pedestrian links which promote active and healthy lifestyle for current and future occupiers.

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## Themed Questions

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### Housing land supply

***TQ3 - How do you think the council can achieve a consistent annual rate of housebuilding throughout the Local Plan Review period?***

- 5.11. It is well documented that the UK is facing a housing crisis. As detailed in the Regulation 18 Local Plan, from 2022, MBC will need to deliver a minimum of 1,236 dwellings per annum. This is a significant increase from the current housing requirement of 883 per annum (40% increase over the existing target). It is important that these homes are delivered through the plan period within sustainable locations. To achieve this, sites such as the Land North of Moat Road should be allocated for residential development, with this site in particular being allocated for delivery of 150 homes.
- 5.12. The Council should use information collected via the 'call of sites' to identify the deliverability of sites. It is important that MBC seek early engagement with promoters, developers and landowners. Working positively with these parties will allow MBC to create an up-to-date housing trajectory to guide how the housing requirement will be delivered over the following years. Catesby fully welcomes the prospect of working with the Council to achieve a successful development which addresses the needs of the area.
- 5.13. Further to this, the Council should seek to allocate a range of small, medium and large sites for both early and later delivery within the Plan Period. The benefits of the allocation of medium size sites (such as the site) is the comparatively fast delivery of 100-200 units within the first 5 years of the Plan Period. Medium sites can also offer contributions and obligations towards the timely delivery of wider strategic infrastructure improvements within the early stages of the Plan Period.

## The Pattern of New Housing Growth

### ***TQ4 – Have we identified all the possible types of housing sites?***

- 5.14. The Council has identified a range of housing site types, such as urban and rural extensions, new settlements, exception sites and small sites. However, this list should not be regarded as exhaustive and in order to ensure that the required housing and developments sites come forward, MBC need to identify the specific sites that will be allocated.
- 5.15. Whilst it is acknowledged that this Regulation 18 consultation is an initial scoping exercise, it is not possible to address question TQ4 at this time, as it is not possible to confirm whether the identified sites exist in the borough to enable housing needs to be met. Evidently, the site at Moat Road is on the edge of a sustainable village and should be supported for an allocation of 150 homes. However, other sites inevitably also need to be found and identified whether falling within or outside of the stated categories listed by MBC. This question can therefore only truly be assessed and responded to when a full list of the proposed allocations are provided in a more detailed consultation version of the Plan. Nevertheless, the Council should approach the allocations of the site with the options B and B1 in mind.

### ***TQ7 – What factors should we take into account when considering minimum density standards elsewhere in the borough, beyond the town centre?***

- 5.16. Available land should be developed efficiently and optimised to its full potential in accordance with paragraphs 117 and 122 of the NPPF. These paragraphs are clear of the need to make the most efficient use of land and increase densities across **all** development sites, not just within town centres. Moreover, in respect of planning applications, where the most efficient use of land is not made, the NPPF encourages planning permission to be refused. This reflects the stance that should be taken in the emerging plan review with regards to density of development.
- 5.17. In all cases the density of a development site should be considered in the context of its surroundings. However, this does not mean that new development should replicate existing forms. A coherent development of any given area, does not necessarily demand that densities remain consistent, and if anything, this would prevent development and design progress reflective of modern design approaches and market / consumer preferences. By setting density standards MBC runs the risk of imposing development standards that result in schemes that replicate their surroundings, stifling innovation and preventing the most efficient use of available land being made.

- 5.18. Furthermore, densities, particularly when shown as a number or in plan form, cannot in isolation determine how appropriate a development will appear. Other factors such as design, scales, materials and landscaping also have a key role. The standards should allow for each site to be maximised whilst maintaining a high-quality environment and should relate to a site's constraints and opportunities. Therefore, the standards or related policy cannot be prescriptive.
- 5.19. In the event that a density standard is set, it is essential that MBC does not simply seek to rely on the surrounding area of any given site to impose or unduly restrict what can otherwise be achieved. As such, standards, if proposed in the Local Plan Review, should be minimum and complement rather than compromise the intentions of paragraphs 122 and 123 of the NPPF. Furthermore, when taking into account the considerable change of housing requirements which the local plan review needs to accommodate, higher densities should be considered at all sites as a base position.

### Creating a Strategy for the Scale and Pattern of Growth

***TQ10 – Do you think there should be changes to the current settlement hierarchy? If yes, what evidence do you have for your answer?***

- 5.20. With regards to the position of Headcorn in the settlement hierarchy this is considered correct. The village is a service centre that provides a good range of local services and facilities that are utilised by the surrounding, more rural, communities. It is considered correct that Headcorn is positioned immediately below Maidstone Town centre in the hierarchy given that Maidstone is the main town and largest settlement in the borough.

***TQ11 - What is your preferred option for the future pattern of growth (A, B, Bi or C) and why?***

- 5.21. MBC has set out 4 options for growth. In summary, these are:
- a. **Maidstone focus** – focusing significant additional growth in and at the edge of the town
  - b. **Dispersal** – spread growth and its benefits into key locations across the borough, including Maidstone. (67%) Rural Service Centres and Large Villages (24%) and sites in the countryside (8%).
  - b.1. **Dispersal option 2** - A variant dispersing new housing to a fourth tier of villages also; and
  - c. **Planned new settlements and major extensions ('garden suburbs')** – placing emphasis on new settlements and major extensions to achieve the right types of growth for the borough.
- 5.22. Option B and B1 provide the only viable options for the emerging plan if the council is to secure sufficient housing delivery and general growth over the plan period. Focusing development in and around Maidstone would not necessarily provide the benefits of a sustainable and accessible community, and most likely exacerbate existing traffic congestion issues.

- 5.23. In this regard, further development would cause significant constraints and urban sprawl to the town and may well result in increased use of private cars, with less use of sustainable transport such as walking, cycling, and public transport. In contrast focusing development in and around other villages as well as Maidstone, and in particular in Headcorn may well encourage such use. The development of the site at Moat Road would for example be closer to existing facilities than a development on the edge of Maidstone to the town centre, and in particular the train station. It is therefore possible that people would use such facilities to access the town centre or places of work and recreation to avoid use of private cars.
- 5.24. Whilst this is certainly not definitive, the view is taken that option A can only work from a sustainability perspective, if considerable new transport facilities and services are provided. This is much the same as a new settlement where a range of facilities will need to be delivered in order to create the desired community.
- 5.25. The option of dispersal is also supported by the NPPF. In this regard, the borough contains five Rural Service Centres (Marden, Staplehurst, Headcorn, Harrietsham and Lenham) that are well serviced with a range of facilities as well as being equipped with frequent public transport connections. Paragraph 72 of the NPPF states *“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.”* These Rural Service Centres are evidently logical areas for growth as evidenced by previous allocations at Lenham.
- 5.26. New developments to these service areas could provide multiple benefits to the local community by enhancing or providing infrastructure. As the Rural Service Centres have existing infrastructure in place, there would be no ‘priority’ infrastructure required. However, MBC will be required to produce a robust evidence base to identified shortfalls or issues in the existing infrastructure capacity and growth areas would then be able to support any identify shortfalls. Clearly if any new settlements are proposed, essential and priority infrastructure would need to be provided before development can commence, potentially causing some delay to delivery. Given the significant housing requirements of the borough this is a very relevant consideration.
- 5.27. The Land north of Moat Road adjoins Headcorn and could deliver 150 dwellings in the short term as there is no need for significant infrastructure improvements. If required, contributions from the development could be used to enhance facilities within Headcorn and this would be discussed with the council if the site is proposed for allocation.

***TQ13 – If your favoured option won’t achieve the number of new homes needed, at the rate they are needed, what combination of options do you think would be best?***

- 5.28. Given the number of homes that are required to be delivered, arguably a combination of all approaches might be necessary to achieve the homes and development that is needed in the borough over the whole plan period. However, this should be focused on having Option B at the heart of such an approach.

- 5.29. Option B would provide more communities in the borough, the opportunity for growth and improved sustainability, be that through support for local services or simply providing the homes and new businesses that families want. Focusing all development around Maidstone would prevent choice, particularly for those who prefer to live in smaller or medium sized villages but are unable to afford to do so due to market prices. Sustainable communities can only be created with a diverse range of people, homes and facilities and this can only be created in this location through option B, or at the very least, a combined approach with option B firmly being the focus.

### Quality of New Development

***TQ14 – Have we identified the correct areas of focus for future masterplanning? What are the reasons for your answer?***

- 5.30. The Government put a large emphasis on the importance of design within the built environment. Paragraph 124 of the NPPF states:

*“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”*

- 5.31. MBC should ensure that new proposals provide high quality places and ensure the criteria at paragraph 127 of the NPPF is met in all development from an early stage. The masterplanning stage is fundamental in the provision of new development. A masterplan should provide a comprehensive scheme that is cohesive with the objectives of the development as well as the surrounding context of the site. In addition to the areas highlighted, the Council should seek masterplans to consider the criteria listed in paragraph 127 of the NPPF. Notably, the Council should ensure that a strong sense of place can be achieved and that the development will function as it is supposed to. Furthermore, the wider context of the masterplan should be examined ensuring that it is sympathetic and works with the existing environment. For example, the illustrative master plan (Vision Framework, Page 23 Appendix B) considers how the development would exist in its context. This involves consideration of the land use and movement throughout the site. These points should be included within any future policies set out by the Council.

### Scoping The Strategic Issues – Issues 1 and 2 (housing and affordable housing)

- 5.32. Chapter 5 sets out a number of other strategic issues for consideration. In relation to housing, issues 1 and 2 are:
- *ISSUE 1 - Meeting the borough’s local housing need and helping to meet needs across the relevant Housing Market Area/s*
  - *ISSUE 2 - Ensuring a sufficient supply of affordable housing*

***TQ16 - How can the Local Plan Review best plan for the different types of housing which will be needed?***

- 5.33. Paragraph 61 of the NPPF requires that the size, type and tenure of housing for different groups should be assessed and then reflected in planning policies. MBC will be expected to follow the standardised method to plan for the minimum number of homes required and complete a housing Market Assessment to determine the range of homes that are required and differentiate between the needs across the district including the urban, suburban and rural areas.
- 5.34. Through the allocation of a range of housing sites, MBC will be able to ensure that a broad range of housing needs are met throughout the plan period. Different site sizes will be able to deliver at different stages and rates and this will help to secure a constant delivery. This can be best achieved through Option B or B1 which provide the best opportunity for MBC to address the needs of the borough.

**Scoping The Strategic Issues – issue 4**

***TQ19 – How can the Local Plan Review help sustain our town and local centres?***

- 5.35. Issue 4 relates to town and local centres. It states: *“Ensuring that Maidstone has a vital and vibrant town centre which maintains its role in the sub-region and that a network of local centres continue to serve local retail and service needs.”*
- 5.36. In order to ensure that town centres remain viable, new housing must be provided around those towns and villages. This will enable a large range of people to live in the villages, some of which may well bring new businesses and opportunities to enhance and sustain the town or village. This could be achieved at Headcorn through the allocation of land at Moat Road, as the 150 dwellings would bring new opportunities and potential increased footfall for the village centre that will help sustain it as a Service Centre for this area of the borough.

**Scoping The Strategic Issues – issue 5**

***TQ21 – Have we identified all the types of transport measures? Which measures do you think we should prioritise?***

- 5.37. Issue 5 states: *“Ensuring sufficient transport infrastructure is provided to serve the new development that is planned”*



- 5.38. The NPPF requires transport matters to be considered at the earliest stages of the plan making process and so we are supportive of the Council addressing this issue at the first stage of consultation. Further to this, the NPPF places great emphasis on supporting sustainable patterns of growth which means locating development in areas where there is a genuine choice of transport modes. It is considered that opportunities to provide growth in areas that have existing sustainable transport infrastructure should be encouraged.
- 5.39. The Regulation 18 Plan has not looked into the possibilities of improving existing infrastructure but focuses on enabling new infrastructure. A mixture of both will be required. The Plan also does not provide details on how the suggested transport measures will be funded and so further analysis on this will be required.
- 5.40. The Land North of Moat Road presents an opportunity deliver a highly sustainable development providing easy access to services, school and work by non-car modes of transport. . This promotes the principles set out in section 9 of the NPPF.

### Scoping The Strategic Issues – issues 7 and 14

***TQ22 – How can the Local Plan Review best integrate health and wellbeing into the planning of new development?***

***TQ29 - How can the Local Plan Review best provide for open space in new development?***

- 5.41. The issues 7 (“*Ensuring sufficient provision is made for health and education*”) and issue 14 (“*Ensuring a sufficiency of parks and open spaces*”) are inter-related and are therefore addressed together here.
- 5.42. As acknowledged in the PPG, there are two ways in which health and planning are considered. Firstly, by creating environments that support and encourage healthy lifestyles and secondly into the wide facilities that affect health (e.g. schools and care systems). MBC must seek high-quality design in new developments as well as consider the overall growth of the area that a development brings. The Local Plan should consider the points a-c of paragraph 91 of the NPPF which principally state that planning policies should aim to create places that:
- promote social interaction;
  - are safe and accessible;
  - enable and support healthy lifestyles.
- 5.43. Open space relates directly to the health and wellbeing of residents. Paragraph 96 of the NPPF states that “*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*”. The PPG [ID:37-0001-20140306] requires local planning authorities to assess the needs for open space and opportunities for new provision in the area.

- 5.44. When considering proposals, the Council should seek to address the points above. If the *Land North of Moat Road* was brought forward as an allocation, it would provide multiple areas for social interaction, including the provision of enhanced open space, a play area and connections to the existing community infrastructure (such as the multiple sports and social groups) in Headcorn. The development will be safe by ensuring the design and layout of the development promotes passive surveillance and reduces opportunities for crime. It is proposed that improvements to Moat Road take place with the development to provide safe vehicular access and new pedestrian sidewalks. This promotes safety not just within the proposed development but into the village as well. Walking and cycling will be encouraged via improvements to existing infrastructure as well as within the development itself.
- 5.45. Finally, the health benefits of providing access to the countryside/green space is widely documented. The proposed development at the land north of Moat Road will connect to the existing public rights of way network which provides access to the surrounding countryside. The items listed here, all integrate health and wellbeing into new development as well as complying with the ambitions of the NPPF.

### Scoping The Strategic Issues – issue 8

#### ***TQ23 – How can the Local Plan Review best manage flood risk whilst still achieving the growth that is needed?***

- 5.46. Issues 8 relates to managing the risk of flood risk from all sources. The NPPF sets out strict policy regarding flood risk, stating at paragraph 155 that inappropriate development in areas at risk of flood should be avoided. The borough's flood risk should be strategically assessed and the Council should work with the Environment Agency (EA) and the Lead Local Flood Authority (LLFA) to actively manage this. Whilst there is no SFRA published yet MBC has indicated that it will publish this as part of the evidence base for the emerging plan, and therefore comments will be provided at a later date in relation to this.
- 5.47. For developments, this means locating them in the lowest flood risk areas (Flood Risk Zone 1) and sequentially testing sites when determining whether to allocate them. The Council have acknowledged that they will work with the EA to help locate appropriate uses in appropriate areas.
- 5.48. As set out in paragraph 165 of the NPPF, sustainable drainage systems (SUDs) should be integrated into major developments and as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015, they should be provided unless confirmed inappropriate.

- 5.49. It should be recognised that the Land North of Moat Road is almost entirely situated in Flood Risk Zone 1 where there is less than a 1 in 1,000 annual probability of river or sea flooding. Sites such as this should be brought forward to meet growth whilst not impacting on flood risk. A small proportion of the south east corner is located in Flood Zone 2 and 3. The development of this site would not include any development in this area. The illustrative masterplan demonstrates how SUDs/attenuation basins could be incorporated into the design and layout to mitigate from any additional runoff caused by the increased development in the area and this would secure greenfield rates. The development in this location could provide reasonable growth within an area of low flood risk and should be allocated within the Local Plan Review.

### Scoping The Strategic Issues – issues 9 and 11

***TQ24 – How can the Local Plan Review best plan for the protection and enhancement of the borough’s environmental assets whilst still achieving the growth that is needed?***

***TQ26 – How can the Local Plan Review best plan for the protection and enhancement of the borough’s biodiversity whilst still achieving the growth that is needed?***

- 5.50. Issue 9 (“*Ensuring that the borough’s environmental assets such as the Area of Outstanding Natural Beauty, Landscapes of Local Value, the countryside and Green Belt are suitably protected and enhanced*”) and issues 11 (“*Ensuring that the borough’s biodiversity and wildlife habitats are suitably protected and enhanced*”) are similarly inter-related and addressed together here in respect of questions TQ24 and 26.
- 5.51. The NPPF makes it clear, at paragraph 170, that planning policies should contribute to and enhance the natural and local environment. This includes minimising impacts on and providing net gains for biodiversity. Paragraph 171 of the NPPF sets out that a hierarchy of international, national and locally designated sites should be distinguished. This has been achieved by MBC in the Regulation 18 Plan. However, the Council’s approach to contributing to and enhancing these areas is less clear. As the plan progresses it is important that this is clarified and where applicable reference is made to the relevant section and paragraphs of the NPPF and PPG.
- 5.52. In relation to the Land North of Moat Road it is important to recognise that the site is largely pasture with some hedgerows, established trees and a pond to the north west. The proposal will aim to ensure existing habitats are sufficiently protected and opportunities for biodiversity enhancement and net gains are incorporated. Overall, it is the intention to achieve an improvement to the net biodiversity on the site. This conforms with the NPPF and therefore there is no reason why the site should not be allocated by the Council on biodiversity grounds.

## 6. Summary

- 6.1. These representations have been formulated on behalf of Catesby Estates PLC in relation to the Land at Moat Road, Headcorn. They are written in response to the consultation on the Maidstone Borough Council Regulation 18 Local Plan Review.
- 6.2. This consultation response has sought to answer all relevant questions in relation to the proposals at the Land North of Moat Road, Headcorn, demonstrating both the value and opportunity that the site brings to meeting housing needs in the borough, and suggesting the approach that MBC should take to ensure a positively prepared plan is progressed.
- 6.3. The Land North of Moat Road was submitted to the Council during the 'call for sites' and is being promoted for a development of 150 residential units. The promotional material submitted to the council as well as these representations demonstrate the sustainable nature of the site and its location, and provide a robust justification for the allocation of the site.
- 6.4. This representation has set out a number of suggestions to MBC's approach for the Local Plan Review, including on the spatial strategy that may be adopted. It is clear that MBC has a considerable amount of work and research to do before the next stage of the plan making process in order to both produce a plan and provide the evidence base to justify any approach taken. At this time, only general comments have been able to be provided on the approach that would be most suited to the borough.
- 6.5. MBC have not published the evidence base as part of this consultation, and there are many instances where there is not considered to be sufficient information to enable a thorough response to be provided. Therefore Catesby and Savills fully reserve the right to comment on further iterations of the Local Plan Review.
- 6.6. It is also highlighted that Catesby would be pleased to meet with policy officers at MBC to discuss the opportunities at the site and how a collaborative approach can be taken to secure its allocation.



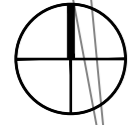


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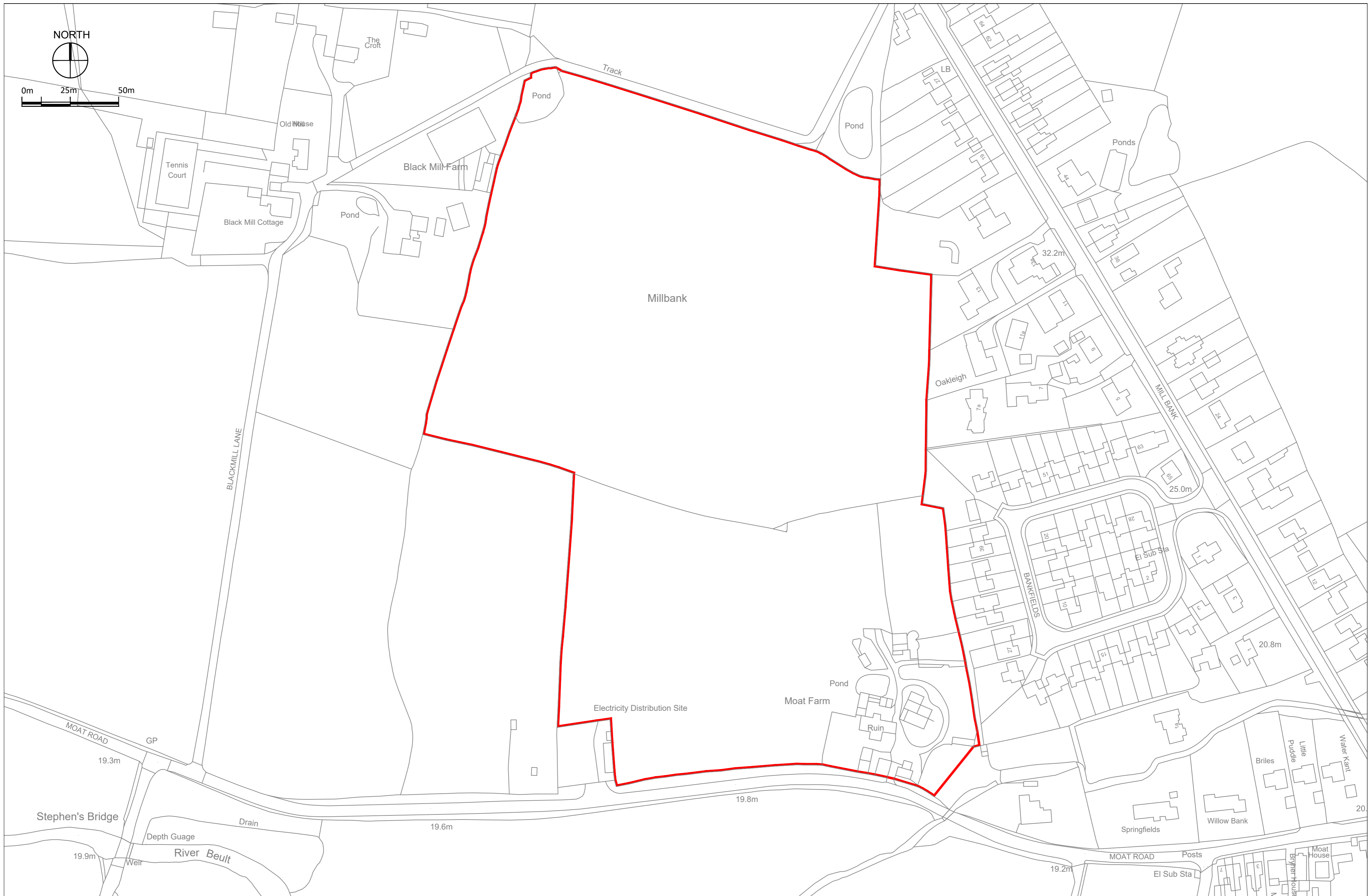
## Appendix A Site Location Plan

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NORTH



0m 25m 50m



Catesby Estates plc  
part of Urban&Civic

Project Name:

LAND NORTH OF MOAT ROAD  
HEADCORN, KENT

Drawing Title:

RED LINE PLAN

O:\Current Sites\All Viability Sites Only\Headcorn, Kent\Technical Drawings\LC\_004 Red Line Plan

Scale: 1:1250	Media/Orientation: A2L	Drawn: LA	Checked: -	Day/Month/Year: 20/05/19
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Project No.:	Drawing No.:
-	LC/004

Suffix:	Date:	Description:	Drawn:	Checked:
Revisions:				



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## Appendix B Vision Framework Document

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Catesby Estates plc  
part of Urban&Civic

# Land North of Moat Road

Headcorn, Kent

Vision Framework

May 2019

# Contents

1. Introduction
2. Planning Context
3. Site Context
4. Local Context
5. Why this location?
6. Site Considerations
7. Illustrative Masterplan
8. Summary
9. Land Promoters & Developers Federation (LPDF)





View towards the south east from the west

# 1. Introduction

This Vision Framework and supporting Transport and Landscape technical assessments have been prepared to accompany representations to the emerging Maidstone Borough Council Draft Local Plan. It presents Catesby Estates vision for a new residential allocation on land north of Moat Road, Headcorn.

Catesby Estates is a specialist strategic land promotion and infrastructure business, focusing on the delivery of residential planning consents and their onward sale to housebuilders. Catesby work closely with councils, local residents and community groups to design high quality developments which deliver significant and lasting benefits.

Catesby Estates forms part of the Urban&Civic Group - a market leader in the delivery of strategic sites. Urban&Civic own and direct eight major strategic projects that are expected to deliver over 33,000 residential homes, 6 million sq ft of associated commercial accommodation, 626 hectares of open space, 11 primary schools and 3 secondary schools.

Catesby and Urban&Civic's approach is one of detailed engagement with local communities and stakeholders alike to ensure that development is sustainable and meets community requirements.

This document describes the site and its surroundings and presents a masterplan concept for the proposed development.





## 2. Planning Context

The site is located within the administrative boundary of Maidstone Borough Council.

Policy LPR1 of the adopted Local Plan requires an early review of the plan, this will include a review of housing needs and identification of additional housing land to maintain a suitable supply. The aim is to have the plan adopted by April 2021.

The existing spatial strategy for the Borough is to focus the majority of new development in and around Maidstone as the county town. The Rural Service Centres, which include Harrietsham, Headcorn, Lenham, Marden and Staplehurst will be the secondary focus for housing development with the emphasis on maintaining and enhancing their role and the provision of services to meet the needs of the local community.

Headcorn provides an excellent range of facilities which both serve the village and the surrounding area. There is both a nursery and a primary school, a range of shops, a doctor's surgery, pub, restaurants and community hall. Headcorn has a thriving local economy with 143 businesses operating out of the settlement. It is also served by a good public transport network including regular bus services to Maidstone and a main line train station running between Ashford and London. Whilst the village lies within a landscape of local importance where proposals should seek to contribute positively to the conservation and enhancement of the landscape, unlike Lenham and Harrietsham, the settlement is not within the AONB.

The site is located close to the village centre and contained by existing development on its eastern and northern boundaries. There is also the ability to strengthen the existing hedgerows and tree belts on the western

and eastern edges of the site to provide strong defensible boundaries which can positively contribute to the conservation and enhancement of the landscape.

### Deliverability

The NPPF and the Government's growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase housing supply, support growth and boost home ownership. Importantly this land is deliverable, to ensure that Maidstone Borough Council can meet their housing need.

To be considered deliverable sites should meet the following tests:

- Be Available
- Be Suitable
- Be Achievable

The land at Moat Road satisfies each of the NPPF criteria as follows:

### Availability

Catesby Estates has agreed terms with the owners of the land to promote for residential development. Catesby Estates is committed to the development and will ensure permission is obtained for residential development to help meet the Council's housing need.

## Suitable

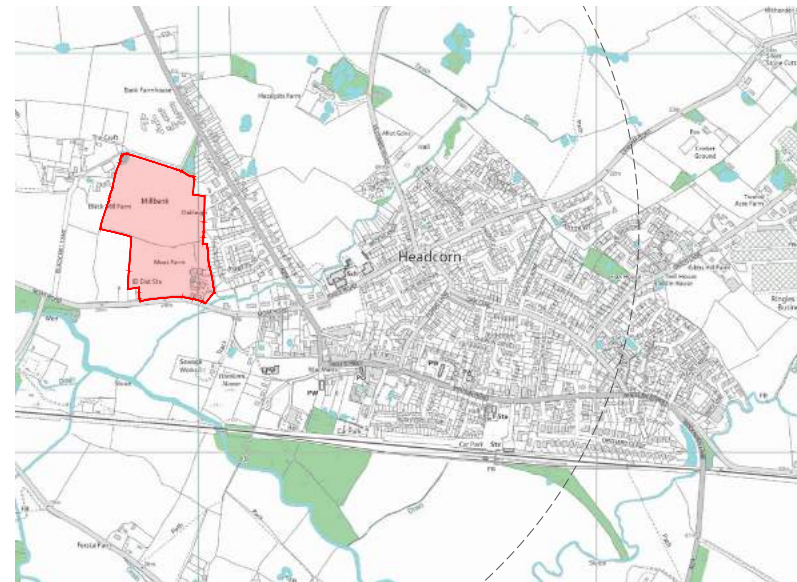
The site is suitable for housing development because it:

- Offers a suitable location adjacent to Headcorn and is immediately adjacent to existing and committed development;
- Can be developed immediately;
- Has no identified environmental constraints that would prevent it from coming forward for residential development;
- Will deliver public benefit in addition to new housing, including much needed affordable housing; and
- Is highly sustainable as it is within walking distance to local services and facilities located in Headcorn.

## Achievable

The concept masterplan illustrates that the site could deliver in the region of 150 dwellings, which would make a significant contribution towards meeting the housing needs of the Borough. This Vision Document and the accompanying supporting technical documentation identifies that the site has no restricting constraints for development.

The Vision Framework proposals confirms that the site is sustainably located, available and capable of delivering a residential development scheme of 150 homes. It is considered that this site should be included in the Council's Local Plan as an allocated site for a residential led development.



*“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.”*

The NPPF (February 2019)

### 3. Site Context

The site under promotion adjoins the built up edge of Headcorn, a village in the borough of Maidstone, Kent.

The site lies approximately 7 miles north east of Cranbrook, 9.3 miles south east of Maidstone and 14 miles north west of Ashford. Locally the site lies 2.5 miles north east of Frittenden, 3.8 miles south of Sutton Valence and 3.8 miles east of Staplehurst. In terms of the local motorway network, Junction 8 of the M20 is 8 miles north of the site and Junction 2A of the M26 is 20 miles north west.

The site itself takes the form of agricultural land situated to the north of Moat Road. The site is accessed via an area of hardstanding off Moat Road which accommodates former farm sheds. A second access is in the form of a field gate to the north west corner of the site which links onto the track connecting Millbank to Black Mill Lane. A public footpath provides pedestrian access into the site from Moat Road. All boundaries are defined by hedges and trees; in addition a central hedgerow partially crosses the site from east to west, visually dissecting the land into two parcels.

Existing dwellings and rear gardens belonging to properties off Millbank and Bankfields border the eastern boundary and the Catkin Gardens development (under construction by Bovis Homes) borders the site to the north. A small collection of dwellings and farm buildings are situated to the north west (off Black Mill Lane) and an electricity sub station sits to the south west corner of the site off Moat Road. Grassed fields border the remaining western edges.

Key facilities closest to the site include a primary school, library and dental practice - each situated within 550 meters of the site at Kings Road. The majority of other local amenities in Headcorn can be found along the High Street (A274) which is less than 800 meters from the site - equivalent to a ten minute walk or 7 minute cycle. Additional education and retail facilities can be found in the nearby towns of Maidstone and Ashford.

In terms of public transport, a regular bus service operates between Maidstone and Tenterden via Headcorn Railway Station. A school bus also operates from Headcorn to the Cornwallis Academy, Maidstone.

Headcorn Railway Station is 0.6 miles south east of the site and operates direct journeys to destinations such as London Charing Cross, London Cannon Street, Dover Priory and Ramsgate.

Nearby local facilities and public transport connections make the site a sustainable location for future development. The site boundary is shown in red on the opposite page. The gross site area extends to approximately 7.26 hectares / 17.93 acres.





Catkin Gardens  
(Bovis Homes)  
Development under construction

A274

Housing Allocation H1 (36)  
for 220 units

The Site

Black Mill Lane

Millbank

Bankfields

Kings Road

Moat Road

A274

High Street

Aerial view of the site

## Site Viewpoints



Aerial view of the site



1.View towards the south east from the north west corner



2.View towards the south from the northern boundary



3. View towards the western boundary from the north eastern corner of the site



5. View across the southern boundary from the central trees and hedgerow



4. View across part of the eastern boundary from the west



6. View north towards the internal tree boundary

## 5. Why this location?

### Local Facilities and Services

Our approach involves understanding the local facilities near to the site in order to determine whether or not additional services are required to benefit both new and existing residents.

As previously highlighted, a range of local amenities are found in Headcorn which includes: a nursery, primary school, library, village hall, post office, supermarket, convenience store, eateries and pubs, sports clubs, recreation grounds, churches, allotments, a doctors surgery, pharmacy and railway station offering excellent train links to various towns and cities. Additional facilities can be found in the nearby towns of Maidstone or Ashford.

In terms of healthcare provision, Headcorn Surgery and Pharmacy is 1 mile east of the site at Grigg Lane. The nearest dentist is Orchard House Dental Practice, 0.3 miles east of the site at Kings Road. Regarding educational facilities, Headcorn Primary School is situated opposite the Dental Practice and adjacent to Headcorn Library which at 0.3 miles equates to just a 7 minute walk from the centre of the site. There are three secondary schools within eight miles of the site: Cranbrook School (6.9 miles south west), Lenham School (7.1 miles north east) and Cornwallis Academy in Maidstone (8 miles north west).

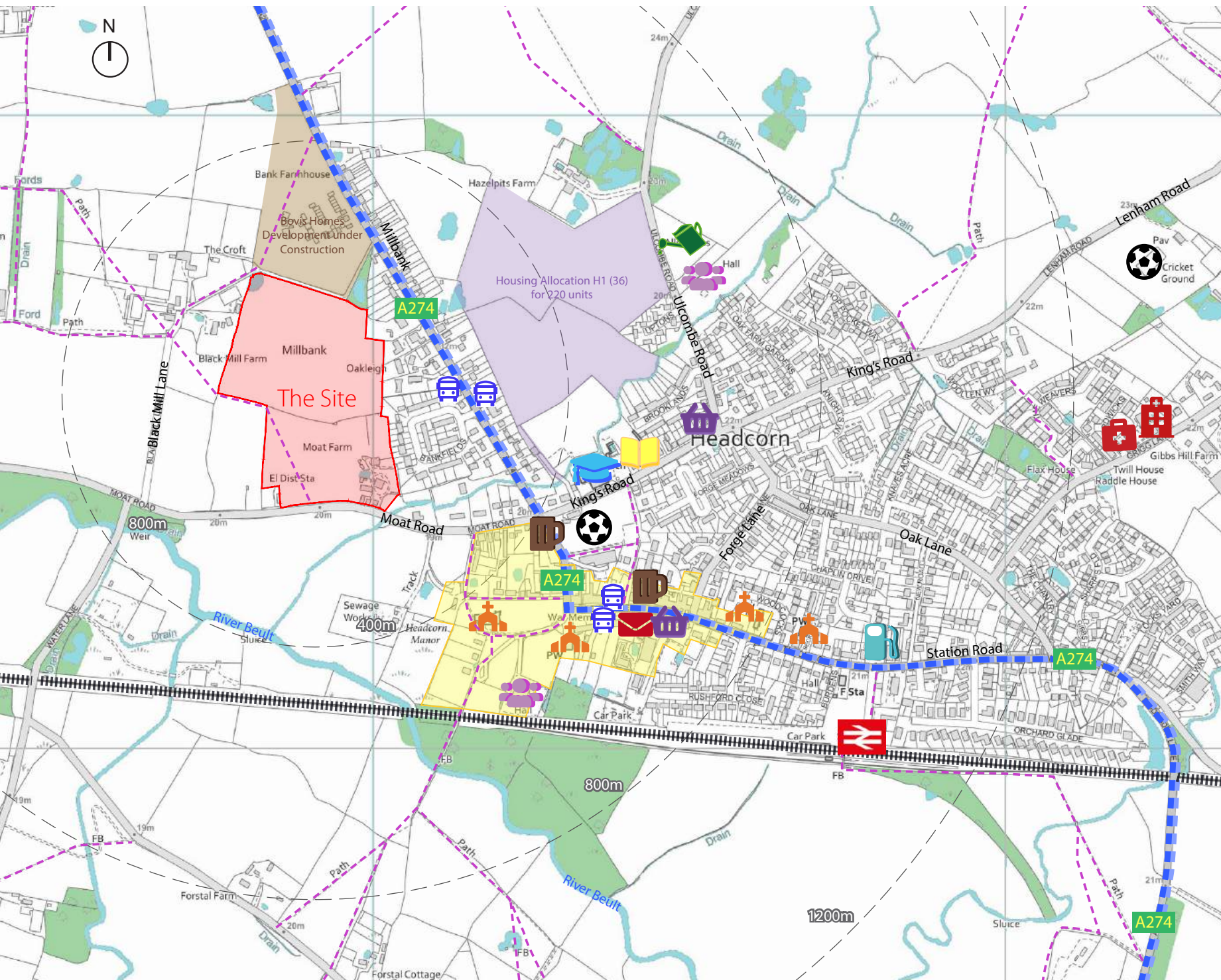
### Accessible Location

Moat Road runs parallel to the site's southern boundary and connects the Kings Road / A274 priority crossroads to the east with Hawkenbury Road (via Summerhill and Four Oaks Road) to the north west. The road is subject to a 30mph speed limit from the east (by the A247) and increases to the national speed limit upon approaching the south east corner of the site, adjacent to the farm sheds.

In terms of local buses, the nearest stops are along the A274 at both Millbank (550m from the site) and the High Street (670m from the site). The stops are served by the Arriva South East 12 bus which runs every 30 minutes during weekdays and hourly at weekends between Maidstone and Tenterden (via Headcorn Railway Station). The Nu-Venture 66 bus also serves both stops and operates a school service to the Cornwallis Academy.



















Headcorn Railway Station is 0.6 miles south east of the site and operates twice hourly services to London Charing Cross (a 1 hour 10 minute journey). At peak times trains also serve London Cannon Street (a 1 hour journey). Additional trains operate separate hourly services to both Dover Priory (a 50 minute journey) and Ramsgate (a 1 hour 17 minute journey) via Canterbury West (a 40 minute journey).

Public Rights of Way connect the village to neighbouring settlements and beyond. A public footpath diagonally runs from the southern site boundary (off Moat Road) to the western boundary (adjacent to Black Mill Farm) before joining onto Black Mill Lane and spurring west towards Summerhill, and north east towards Millbank (via the Catkin Gardens development under construction).



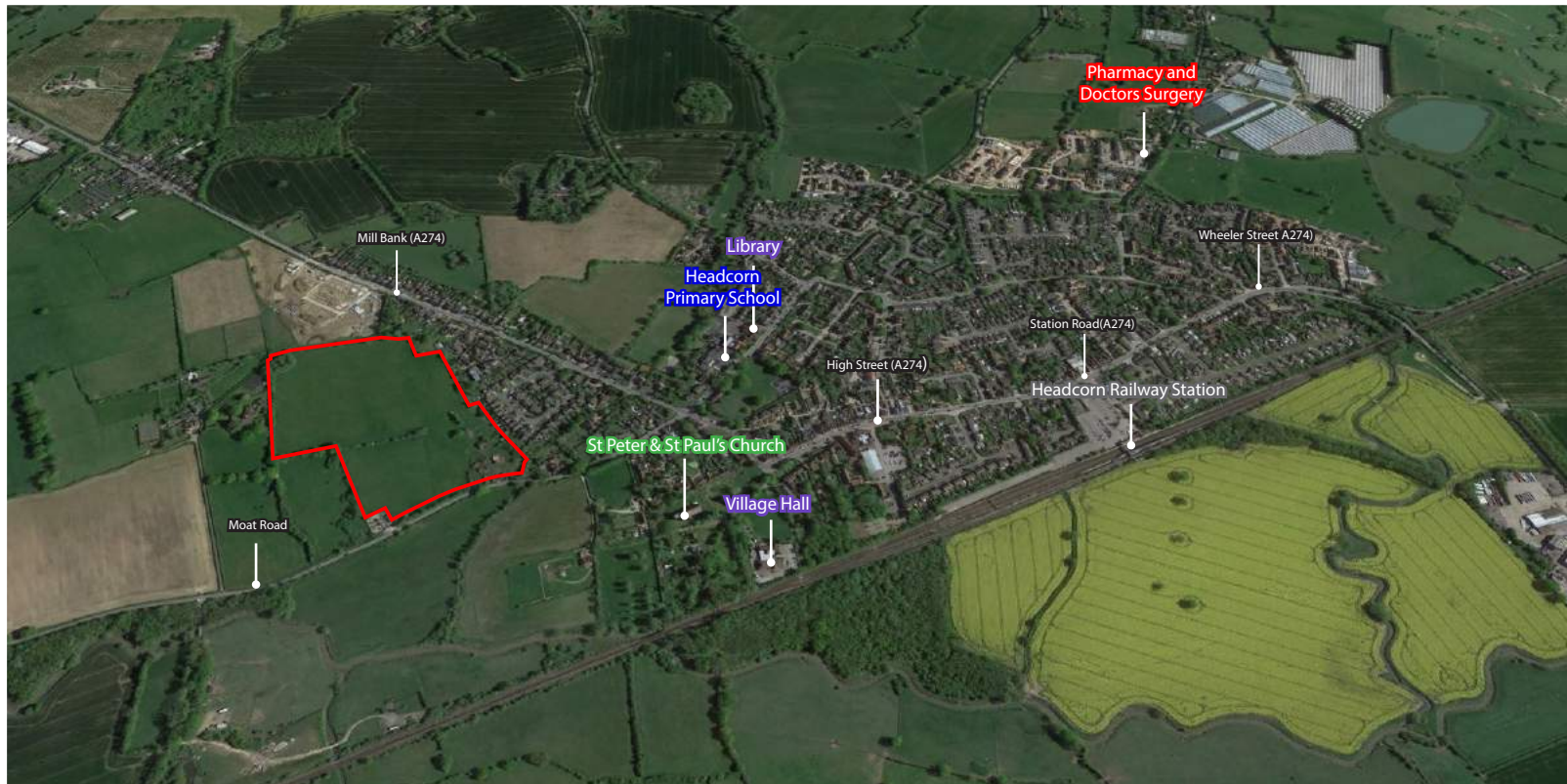
Local Facilities Plan

Key

-  The Site
-  Closest Bus Stops
-  Bus routes
-  Public rights of way
-  Headcorn Railway Station
-  Headcorn Conservation Area
-  School
-  Local supermarkets / convenience stores
-  Filling Station
-  Pharmacy
-  Doctors Surgery
-  Post Office
-  Places of Worship
-  Community Facilities
-  Library
-  Public Houses
-  Recreation Grounds / Sports Facilities
-  Allotments

## 6. Site Considerations

This section provides an overview of the site's characteristics and all environmental and technical matters. It confirms there are no significant physical, environmental or technical constraints to developing the site for residential use. The plan featured at the end of this section shows some of the site's constraints and opportunities for development.



Aerial view across the site

## Landscape\*

Headcorn lies within a landscape of local importance and therefore proposals will seek to contribute positively to the enhancement and conservation of protected landscape. The village is also surrounded by the River Beult which is designated as a Site of Special Scientific Interest (SSSI). At closest, the river lies 160m south of the site.

At present, there are some limited views into the site from the west through gaps in the hedgerow. A sensitively designed landscape scheme featuring visual mitigation measures (for example, lower ridge heights to the north and a landscaped buffer to the west) would create strong defensible boundaries which help to conserve and enhance the landscape. This would ensure the development would respect its edge of settlement location as well as neighbouring amenity. It would also provide new public open space and areas for biodiversity enhancement.

With mitigation, any potential landscape and visual effects resulting from developing the site would be limited to views from pedestrians using Moat Road, those using the public footpath network and from buildings in close proximity to the site - such as the dwellings situated off Black Mill Lane, Catkin Gardens and those backing on to the eastern boundary. Views would be seen in the context of neighbouring residential development to the north, east and north west and can be seen as a natural extension to the western edge of Headcorn.

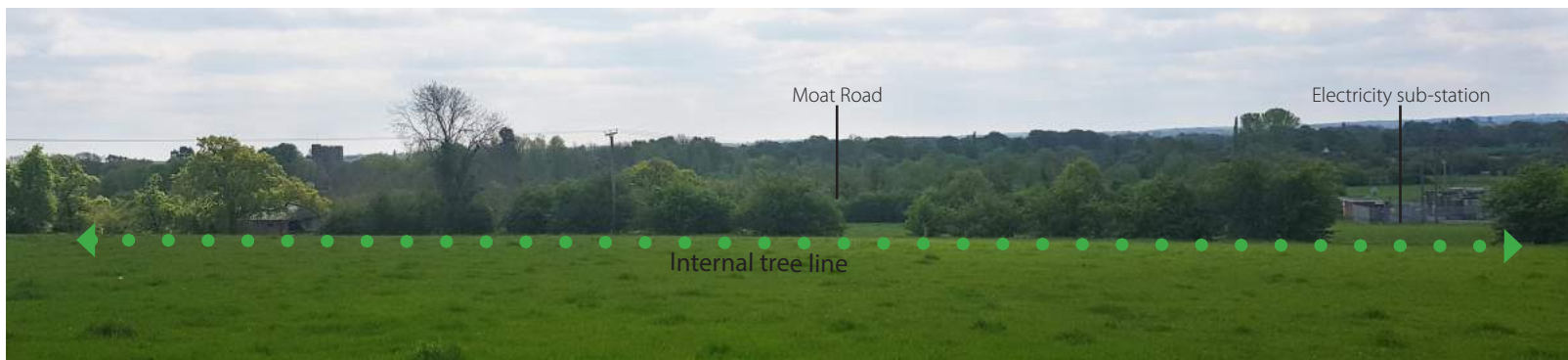
\*For more detailed information, please refer to the accompanying Technical Note produced by The Environmental Dimension Partnership Ltd.

## Heritage

There are forty listed buildings in Headcorn which includes the Grade I Listed Church of St Peter and St Paul - approximately 240m from the sites south east corner. The site itself does not contain any listed buildings however The Moat - a Grade II Listed former farmhouse, sits approximately 35m east of the existing farmsheds on site.

The majority of listed buildings are set within the historic core of the village which is designated as a Conservation Area. The Conservation Area (as highlighted on the Facilities Plan) surrounds the Church of St Peter, the southern side of Moat Road and the High Street - the closest part of the area being 140m from the site.

A Heritage Assessment will be undertaken to establish any impact this proposal would have on the setting of the Conservation Area and listed buildings. However it is considered there is sufficient separation between the site and any heritage asset to avoid any harmful impact. In addition, there are no direct views into the site from the Church of St Peter and St Paul or from within the Conservation Area. Through a careful masterplanning process, the deliverability and capacity of the site for development should not be constrained.



View towards the southern boundary from the north

### Arboriculture

The site is defined by hedgerow and trees to all perimeters with an internal tree line (albeit with gaps) visually dissecting the site into two parts. Maidstone Borough Councils 1986 Tree Preservation Order (TPO) Plan identifies TPO's set amongst five Oak and Ash trees within the internal tree line, within a cluster of trees on the central western boundary and to the north west and north east corners. Appropriate development stand-offs will be proposed to ensure protection.

Tree and hedge clearance will be required in order to facilitate both the vehicular and emergency access into the site however every effort will be made to preserve all other significant trees and hedgerows within the proposal. Large densities of new tree planting will be proposed throughout the site to offset tree loss and soften development.

Detailed investigation will determine the significance of vegetation on site and will include the completion of a BS5837:2012 compliant tree survey.

### Ecology

The site is largely pasture which has a low ecological value. Habitats of elevated value within the site, including hedgerows, established trees and the pond to the north west corner will be retained unless they are required to be removed in order to facilitate access.

Overall, the site is considered to provide only minor opportunities for protected species however ecological surveys would be undertaken to confirm this. The proposals will include any appropriate mitigation to ensure that existing habitats are sufficiently protected and opportunities for biodiversity enhancement are incorporated. This could include the reinforcement of green infrastructure, introduction of wetland features and installation of bat and bird boxes.



### Ground Conditions

BGS mapping shows bedrock of the Weald Clay Formation which comprises Mudstone and Limestone. No superficial deposits have been recorded and the site is not affected by coal mining. The site is within the 3-5% radon potential which requires basic gas protection (radon proof membrane).

The site has been used for agriculture since at least 1875. Given the current and former uses, the risk of significant contamination being present is low across the majority of the site, however prior to development a ground investigation will be required. Existing buildings and hardstanding areas to the south east corner of the site will need to be assessed for asbestos and contamination due to the sites previous uses.

### Air and Odour

Sewage Works are situated approximately 180m south east of the site and therefore shouldn't impact proposed development. However an Odour Assessment could be undertaken to confirm this should it be required.

### Flood Risk and Drainage

The Environment Agency's Flood Map shows that the majority of the site is located in Flood Zone 1. This comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding <0.1%>.

The south east corner of the site is located in Flood Zone 2 and 3 (due to close proximity to the River Beult and its tributary situated to the south east of the site) so must therefore be exempt from development.

GOV.UK surface water flood mapping has been investigated and low risk surface water flooding has been identified to the south east. Surface water outfalls into an existing culvert on Moat Road which connects onto the south east tributary before joining the River Beult. In order to alleviate any potential risk (albeit low risk) additional flood modelling assessments will be undertaken.

A surface water attenuation and disposal strategy utilising SUDS features will also be prepared to inform proposals.

Foul drainage will outfall into the existing sewer identified on Moat Road. Capacity checks will however be required to confirm that the sewer can accommodate the proposed flows with a potential requirement for improvement works.

### Utilities

Mains gas, water, electricity and BT (fibre) will all need to be installed to serve the site all of which are available in Headcorn. Confirmation will be sought from each network operator to determine whether reinforcement to existing infrastructure will be required to serve the site.

At present, 33kv Overhead Power Cables diagonally cross the site however these are due to be removed and replaced with a high voltage underground cable running parallel to the sites western boundary as part of the proposals.

### Noise and Vibration

The surrounding uses of the site are largely residential therefore noise is unlikely to be an issue for either existing or future residents.

It is recognised that the electricity sub-station in the south west corner of the site could have a localised impact. A baseline noise level survey and an assessment of the site to examine the extent of the current noise environment will be carried out based on the guidance contained within British Standard (BS) 8233:2014 "Guidance on sound insulation and noise reduction for buildings".

The results of the assessment will include any requirements for mitigation measures to ensure that internal and external noise levels are within guideline values. Due to the localised nature of the noise source it is considered that simple mitigation measures such as fencing or building fabric would be sufficient.



Ordnance Mapping



View south towards the electricity sub station

## Highways and Access

The site is currently accessed via an area of hardstanding off Moat Road which accommodates former farm sheds. A second access is in the form of a field gate to the north west corner which links onto the track connecting Millbank to Black Mill Lane.

Primary vehicular access into the site is proposed off Moat Road, approximately 28m east of the electricity sub station entrance and would take the form of a 5.5m wide priority t-junction. An emergency access is also proposed to the north of the site which would connect onto Millbank (A247) via the existing track.

Internal access around the site will be along secondary roads, shared surface areas and private drives. Parking will be provided in accordance with Supplementary Planning Guidance.

An existing pedestrian link into the site is in the form of a public footpath which diagonally runs from the southern boundary (off Moat Road) to the western boundary (adjacent to Black Mill Farm). In order to achieve a suitable access into the site, the footpath will need to be diverted along the western boundary. This can be carefully designed to link in to the proposed open space and landscape areas to retain a high quality environment for its users. All remaining footpath links on site shall be retained and enhanced.

Proposed pedestrian access will be provided by a 1.5m wide footway adjacent to the primary vehicular access into the site. The emergency access plus the existing access to the north west would be utilised as pedestrian accesses and link around all development perimeters, strengthening the choice of route within the site.



View west along Moat Road



View east along Moat Road, adjacent to the public footpath entrance into the site



View west along Moat Road

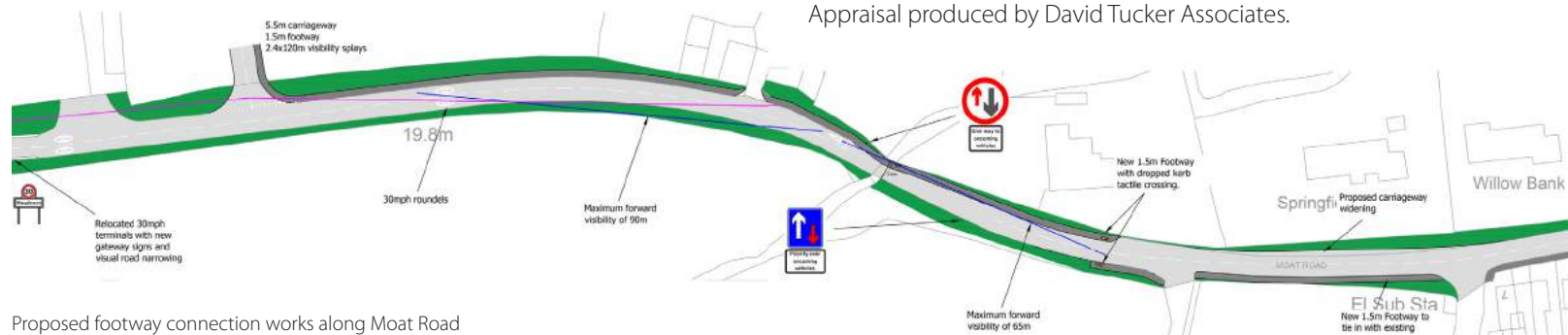
### Additional Highways Improvements\*

In order to improve road safety and pedestrian connections into the village centre, new 1.5m footways are proposed along Moat Road which would tie in with existing footpaths to the east which connect to the village centre.

The carriageway would also be widened and feature signage at the existing bridge; warning drivers coming into the village to give way to traffic, and giving priority to those travelling west (heading away from the village). This will automatically reduce the speed of vehicle entering the village.

In addition the existing 30mph speed limit would be relocated further west (adjacent to the electricity sub station entrance) and feature new gateway signs, roundels and visual road narrowing.

Further assessments and consultation with the Local Highway Authority will be undertaken to ensure that any impact from the development on the local highway network is sufficiently mitigated.



Proposed footway connection works along Moat Road

\*For more detailed information, please refer to the accompanying Transport Appraisal produced by David Tucker Associates.

# Constraints and Opportunities

## Key

-  Gross site boundary  
= approx. 7.26 ha / 17.93 acres
-  -30m- Site contours
-  Existing ponds / watercourses
-  Public Rights of Way
-  Existing road network
-  Existing bus stops
-  Existing Overhead Power Lines  
to be diverted / undergrounded
-  Extent of Flood Zone 2 within the site
-  Extent of Flood Zone 3 within the site
-  Catkin Gardens - Bovis Homes  
Development under construction
-  Housing Allocation H1 (36) for 220 units
-  Existing Sewage Works with 150m isochrone
-  Grade I Listed Church of St Peter and St Paul
-  Grade II Listed Buildings
-  Grade II\* Listed Buildings
-  Proposed enhancements to Moat Road  
inc. widened carriageway and new footpaths
-  Proposed vehicular access - all modes
-  Proposed vehicular emergency link
-  Proposed pedestrian access points
-  Public Footpath to be diverted
-  Existing outbuildings to be demolished
-  Proposed HV Underground Cable
-  Proposed play spaces (LAP and LEAP)
-  Existing and proposed tree planting
-  Proposed acoustic fencing and structural planting to  
mitigate noise and views to Electricity Sub Station
-  Proposed surface water attenuation
-  Proposed residential development
-  Retained and enhanced open space



## 7. Illustrative Masterplan

Following site visits, technical assessments and current and emerging planning policy requirements, we have developed an Illustrative Masterplan.

The key opportunities for new development include:

- the potential to create a high-quality sustainable residential development with a strong emphasis on good design and “place-making”
- the potential to integrate the development proposals within the existing village fabric and public right of way network.
- the potential to provide new homes with a mix of typology, scale, mass and size, contributing towards an interesting street scene avoiding repetition, echoing the character and identity of the local area while meeting the needs of local people
- the opportunity to provide much needed affordable housing
- the opportunities to create appropriate and accessible public open space and green networks through the site
- the opportunity to create new pedestrian links to the north (towards the Bovis Homes development and Mill Bank) which will connect onto retained and enhanced public footpath links via new routes.
- the opportunity to provide improvements to the local highway infrastructure network within the surrounding context
- providing attenuation features on the site to control the discharge of surface water run-off from the development offering betterment to the surrounding area.

The adjacent masterplan illustrates residential development comprising 150 units. The configuration of housing blocks can be planned to reflect the local setting so the development integrates seamlessly into the site and local area.

The indicative proposals are underpinned by key design principles:

- an achievable, well-structured housing layout which uses the site’s natural features with key character areas throughout, creating a positive ‘sense of place’
- an easy-to-read street hierarchy (to include a primary loop road, secondary routes and tertiary movement corridors) is proposed to maximise connectivity and aid permeability.
- the majority of dwellings are two storeys high with occasional two and a half storey units to the lower parts of the site. Dwellings comprising lower ridge heights shall be at the highest parts of the site to the north. Development is of a higher density at the central core and to a lower density along the peripheries. At the development edge, the majority of units are detached houses or maisonettes which are set at varying orientations whereas central areas feature a more formal pattern which comprises a larger number of terraced, semi-detached blocks.
- tree/hedgerow retention will be maximised wherever possible and enhanced through new planting which will soften the street scene. Retained trees, hedgerows and enhanced boundaries contribute to the scheme while helping to integrate the development within its surroundings. In addition, densely landscaped buffers are proposed along the western edge acting as both visual and acoustic mitigation.
- Publicly accessible open space will help the health and welfare needs of future occupants. A large quantum of green space is situated to the west which includes space for play whilst acting as a softer transition between built form and neighbouring countryside. Additional open space is situated to the south east which can accommodate attenuation.



# Illustrative Masterplan

## Key

- Gross site boundary
- Existing ponds / watercourses
- Public Rights of Way (excluding public footpath on site to be diverted)
- Existing road network
- Catkin Gardens - Bovis Homes Development under construction
- Existing farm buildings to be demolished
- Principle street with footways
- Emergency vehicular access
- Secondary roads
- Shared surfaces and nodes
- Private drives
- Development blocks
- Proposed play spaces (LAP and LEAP)
- Existing and proposed tree planting
- Proposed pedestrian links
- Proposed surface water attenuation
- Retained and enhanced open space



## 8. Summary

The planning, environmental and physical context of the land north of Moat Road, Headcorn has been robustly assessed.

The analysis of the site and the illustrative proposal presented within this document demonstrates how a well-designed, high-quality development of 150 homes can be delivered.

This Vision Framework positively confirms that the site is sustainably located, available and capable of delivering a residential scheme.







Land north of Moat Road, Headcorn represents an opportunity to deliver a well designed scheme, responding to the local context.

View towards the east from the southern boundary

# 9. Land Promoters and Developers Federation

Catesby Estates are members of the Land Promoters and Developers Federation (LPDF).

## Who are the LPDF?

The Land Promoters & Developers Federation (LPDF) is a collection of the UK's leading land promotion and development businesses. LPDF members specialise in the promotion and development of predominantly strategic land across the UK, delivering from circa 30 new home sites to larger scale sites of up to 10,000 new homes alongside associated community facilities, employment and supporting infrastructure.

The perceived opacity, complicated and lengthy nature of the planning system is commonly blamed for the supply of housing not meeting the demand for new homes. Within this, the role land promoters play in the delivery of housing, infrastructure and entire new communities is often misunderstood. We want to dispense with some of the myths and misconceptions around the role of land promoters and developers by highlighting the expertise and track record of our members as well as through research relating to the sector as a whole.

By coming together, despite our competing interests, our ambition is to enhance the current debate on housing supply and be part of the process of finding solutions that makes the future for those still searching for a home of their own a brighter one.

## What we do

LPDF members support the housebuilding sector providing "oven ready" land with planning permission that can easily be acquired and built out by national and regional housebuilders, helping bring homes to the market in a timely manner to meet local need.

Land sites include both greenfield and brownfield land, often requiring significant investment in infrastructure and decontamination.

Approaches to engaging with housebuilders varies depending on the scale of development. Some land promoters and developers will sell land once consented to housebuilders, with some acting as Master Developers providing infrastructure such as schools and sports facilities, before selling serviced land parcels to multiple housebuilders, therefore enabling faster delivery and bringing new homes to the market quickly.

## Our goals

- To achieve planning permission and provide housebuilders with a supply of consented land for the delivery of homes in a timely manner to help address the undersupply of housing in the UK.
- Dispel the myths and misconceptions of the role of land promoters and developers in housing delivery.
- Enhance the current debate on housing supply and be part of the process for finding solutions to solve the housing crisis.



