

Maidstone Borough Local Plan Examination: Consultation on ED118 Employment findings – Response by Headcorn Parish Council, February 2017

- 1) Headcorn Parish Council is the elected body that represents the residents of Headcorn Parish. Headcorn Parish is a designated Neighbourhood Plan Area, and Maidstone Borough Council has assigned it rural service centre status. The views expressed in this consultation response have been informed by the evidence gathered to underpin Headcorn's Neighbourhood Plan. Headcorn's Neighbourhood Plan is at an advanced stage, having completed its Regulation 16 Consultation on February 26, 2016 and is now at examination. Completion of the examination has been delayed, as the original examiner for Headcorn's Neighbourhood Plan was forced to withdraw, having lost her accreditation. Therefore, Headcorn's Neighbourhood Plan had to be sent to a second examiner, and the examination expected to be completed by the end of February 2017 following a further delay due to the examiner's ill health. Headcorn's Neighbourhood Plan enjoys considerable local support, with 93.9% of respondents for the Regulation 14 consultation supporting the draft Plan and similar support expressed at Regulation 16 Consultation. Therefore the views expressed in this consultation response about Headcorn's development should be seen as representative of the overall needs and priorities of the people and businesses within Headcorn Parish.

This response has been prepared for Headcorn Parish Council with the help of Dr Rebecca Driver. Dr Driver is Director of the research consultancy Analytically Driven Ltd. She is an economist with over 25 years of experience and her work has focused primarily on research and evidence to support policy makers. Her previous roles include Research Adviser to the External Members of the Monetary Policy Committee of the Bank of England and Director of Research and Chief Economist at the Association of British Insurers.

I. Overview

- 2) On p29 of the Inspector's Interim findings the Inspector stated that:

"It is necessary to establish both whether there is likely to be sufficient land overall to accommodate the employment needs and also what effect there may be on travel patterns, including net flows to London or elsewhere.

An assessment is therefore needed which updates the position on job targets and employment land provision in Maidstone and the adjoining Boroughs/Districts within the same economic area relative to the anticipated housing and population growth in those areas."
- 3) Headcorn Parish Council supports the Inspector's call for additional evidence that will help drive improvements in Maidstone's Local Plan. Headcorn Parish Council has consistently expressed concerns not only about the gaps in Maidstone's

evidence base, but also in how existing evidence has been used (or in the case of the site assessment exercises ignored) during the development of Maidstone's Local Plan. Headcorn Parish Council considers that more effective use of evidence is needed to underpin the strategy in Maidstone's Local Plan in order for the plan to be found sound. Without significant adjustments Headcorn Parish Council considers that Maidstone's Local Plan does not meet the definition of sound set out in the NPPF, because of its failure to properly consider the sustainability implications of the approach taken.

- 4) Headcorn Parish Council welcomes the opportunity to comment on ED118 – Maidstone Borough Council's response to the Inspector's request for additional evidence. Headcorn Parish Council intends to comment on four aspects of the evidence presented by Maidstone Borough Council:
 - a) The sites chosen to support employment growth. Maidstone's response highlights the over-reliance on the Woodcut Farm development within the Local Plan. As with some of the allocated housing sites, Headcorn Parish Council notes that this site performs poorly in Maidstone's site assessment exercise relative to other available sites. Headcorn Parish Council considers that the Inspector should intervene to address these imbalances. Without intervention there is a high risk that sites that perform badly on sustainability grounds are given planning permission in the interim, meaning it is not reasonable to wait until the proposed Review to address this issue and failure to do so will impact the sustainability of the Local Plan.
 - b) How Maidstone compares to the other Boroughs identified in the analysis in ED118. Headcorn Parish Council notes that migration explains a much greater share of Maidstone's population growth than the other Boroughs considered. Headcorn Parish Council considers that this supports the case for a reduction in the proposed housing growth, in order to ensure that recent distortions are not perpetuated.
 - c) Commuting patterns. Headcorn Parish Council notes that Maidstone performs badly in terms of commuting patterns compared to the other Boroughs considered. Again Headcorn Parish Council considers that this supports the case for reducing projected housing growth.
 - d) Issues to cover in the review of Maidstone's Local Plan. Headcorn Parish Council supports a wide ranging review of Maidstone's Local Plan to be completed by 2021.

II. Sites chosen to support employment growth

- 5) Headcorn Parish Council notes that, as set out in Table 1 of ED118, the Woodcut Farm allocation is expected to contribute 55.6% of Maidstone's office needs and 60.8% of the Borough's industrial and warehousing needs. Headcorn Parish Council considers that the concentration of employment land on a controversial site that is geographically removed from any settlement and performs extremely poorly in Maidstone's site assessment exercise (as set out in evidence paper SUB 002 G) is inappropriate.

- 6) Headcorn Parish Council notes that an important part of whether the Local Plan is sound rests on the choice of sufficient sustainable land being available to support the employment needs for the Borough. Headcorn Parish Council notes that the evidence provided by Maidstone Borough Council in ED118 fails to consider the question of whether the sites chosen perform well, or whether alternative sites might be better placed to support the needs of Maidstone Borough.
- 7) Headcorn Parish Council notes that the allocation of Woodcut Farm cannot be motivated by the lack of better sites elsewhere, as the site clearly performs poorly relative to several other available sites. This can be seen from the site comparison in Table 1. With the exception of Woodcut Farm, all the sites highlighted in the table were rejected from inclusion in Maidstone’s Local Plan. Together these rejected sites would provide around 90Ha of potential employment land, almost five times the amount of land allocated at Woodcut Farm. Furthermore, these sites all performed demonstrably better than the Woodcut Farm allocation. Indeed with the exception of one of the Detling sites (ED3), the share of green flags out of the total was more than 50% for all these sites, compared to a 35.5% share of green flags for Woodcut Farm.

Table 1: Comparison of selected employment sites

Site number	Site Location	Site Size (Ha)	% green flags	% red flags
ED12	Woodcut Farm	18.70	35.5%	34.4%
ED2	Detling	2.37	53.1%	25.0%
ED3	Detling	44.70	43.8%	31.3%
ED14	Lenham	8.66	56.3%	18.8%
ED2-19	Aylesford	10.91	56.3%	28.1%
ED2-20	Springfield Mill, Maidstone	6.69	71.9%	9.8%
MX-4	Coxheath	6.97	58.1%	19.4%
MX-13	Springfield, Maidstone	2.11	77.4%	6.5%
MX-11	Lenham	5.22	61.3%	12.9%
MX-12	Lenham	2.62	54.8%	12.9%

Note: Based on results in Maidstone’s site assessment exercise set out in evidence paper SUB 002 (G)

- 8) Headcorn Parish Council considers that the failure of Maidstone Borough Council to make effective use of its site assessment exercise in allocating sites is a clear failing in the Local Plan. It is clear that the chosen allocations are entirely arbitrary, rather than underpinned by a systematic assessment of their impact on sustainability as required by the NPPF. The fact that Maidstone’s Sustainability Appraisal has failed to highlight these discrepancies could call into question the reliability of the appraisal itself as an assessment of the sustainability of Maidstone’s approach. This is because it is not possible to explain how the

sustainability findings in the site assessment exercise have shaped decision taking.

- 9) Headcorn Parish Council notes that there is no discussion in ED118's assessment of commuting patterns, or in Policy EMP1(5) itself of the need for a Leeds-Langley bypass to be provided. KCC has highlighted the importance of this bypass as a way of supporting the traffic flows associated with proposed development within the south east of Maidstone. Headcorn Parish Council notes that even without the addition of a major employment hub at Woodcut Farm, such a relief road is already needed, as the B2163 road through Leeds has sections which only allow a single lane of traffic and it is currently already significantly congested.
- 10) Headcorn Parish Council also notes that the Woodcut Farm site will be poorly served by public transport. While there is provision for bus stops within Policy EMP1(5), an examination of bus usage in the surrounding areas suggests that the vast majority of journeys to the site are likely to be by car, particularly given it is geographically removed from local settlements. Headcorn Parish Council notes that the three areas closest to the site all have below average bus usage amongst commuters from those areas, with bus usage making up 4.5% of journeys from Bearsted, 4.2% of journeys from Leeds, Langley and Chart Sutton and 1.1% of journeys from Harrietsham and Lenham. This suggests that the reliance on Woodcut Farm to provide the majority of employment land within the borough will foster increased car usage, contrary to sustainability goals and the goal of supporting sustainable transport modes as set out in the core planning principles in paragraph 17 of the NPPF.
- 11) Headcorn Parish Council considers that the impact of the proposed Woodcut Farm development on traffic flows has not been adequately explored. In light of the reliance on this site for employment provision within the Local Plan highlighted in ED118, Headcorn Parish Council considers that this represents a significant flaw in the Plan.
- 12) Headcorn Parish Council notes that it is not just in the case of employment allocations where the site assessment exercise reveals significant discrepancies in the sustainability of Maidstone's proposed allocations, with other more sustainable options available. Headcorn Parish Council set out in Section III.c.i. of its response on Consultation on PC/84 and PC/85 the evidence showing how the results of the site comparison exercise had been ignored in deciding on Maidstone's housing allocations. As part of that evidence (in Table 4A and 4B) Headcorn Parish Council drew attention to the discrepancy between the five worst performing allocated sites and the five best performing unallocated sites.
- 13) Table 2 sets out the performance of the five worst allocated sites within Maidstone's Local Plan, highlighting the volume of housing available in other more sustainable and unallocated sites. Headcorn Parish Council notes that two of these poorly performing allocated sites are in Headcorn. Furthermore, the performance of allocation H1(37) will have deteriorated since the site assessment exercise was undertaken, as the GP surgery in Headcorn has moved since that exercise was done.

Table 2: Five least sustainable sites allocated through the Local Plan

Policy number	Location	Site yield	Share of red flags (%)	Share of green flags (%)	Number of better performing unallocated sites	Yield of better performing unallocated sites
H1(37)	Headcorn (HO-7)	155	20.7%	48.3%	178	14,683
H1(32)	Bearsted	50	20.7%	41.4%	183	19,250
H1(39)	Headcorn	55	24.1%	48.3%	203	22,140
H1(65)	Hollingbourne	15	24.1%	48.3%	203	22,140
H1(68)	Laddingford	10	31.0%	51.7%	235	25,420

Note. Based on Maidstone's Site Assessment Exercise. For more details see Section III.c.i. of Headcorn Parish Council's response on Consultation on PC/84 and PC/85. The sites chosen correspond to those highlighted in Table 4B of that response.

- 14) Headcorn Parish Council considers that the allocation of poorly performing sites, both in terms of employment allocations and housing allocations, is clearly at odds with the need for Maidstone's Local Plan to be found sound. It is clear that an alternative approach to site allocation could significantly improve the sustainability of the Plan, simply by allocating alternative sites that were put forward as part of Maidstone's consultations on the availability of both housing and employment land. Headcorn Parish Council notes that the Inspector did not address this aspect of Maidstone's proposed development pattern in his Interim Findings.
- 15) Headcorn Parish Council considers that the failure to use the findings of the site assessment exercise to inform site selection represents a significant flaw in Maidstone's approach that cannot be justified given the availability of alternative options. Headcorn Parish Council therefore urges the Inspector to remove poorly performing sites from the Local Plan, including the Woodcut Farm employment allocation and the proposed housing allocations H1(37) and H1(39), pending the Review of the plan to be conducted by 2021. This will prevent otherwise unsustainable sites being granted planning permission purely because they are currently in the Local Plan.
- 16) In the case of the sites in Headcorn, Headcorn Parish Council notes that the development of a site in Headcorn that made up part of site HO3-306 was rejected at Appeal on December 9 2016 (Appeal Ref: APP/U2235/W/16/3151144). The Inspector, Nick Fagan BSc (Hons) DipTP MRTPI, noted in paragraph 35 of his findings that:

"The LPA has seen fit to allocate, despite their relatively low sustainability credentials, a number of housing sites in Headcorn and has already given planning permission for 497 dwellings since 1 April 2011, the majority of which are on those sites."

and concluded in paragraph 41 that in the case of the site in question:

“The proposal to build houses on this site would not therefore be sustainable development as defined by the NPPF.”

- 17) Headcorn Parish Council notes that the site in question, while unallocated, performed marginally better in the site assessment exercise than either the allocation H1(39) or the part of allocation H1(37) made up of SHLAA site HO-7. It is clear therefore that it is not just Headcorn Parish Council that has concerns about the sustainability of sites in Headcorn.
- 18) Headcorn Parish Council notes that the Inspector himself on p10 of his Interim Findings stated the importance of assessing locations individually and urges the Inspector to do precisely that when he presents his final findings. Headcorn Parish Council considers that some discretion in site choice on the part of planning officials is clearly desirable. However, such discretion should not be permitted where the result is that the objective evidence on the comparative sustainability of alternative sites from the site assessment is blatantly ignored.

III. How Maidstone compares to the other Boroughs

- 19) Headcorn Parish Council notes that in his request for additional evidence to be provided, the Inspector made clear that the evidence should consider the context of housing and population growth. Headcorn Parish Council notes that the data provided in the Table on p7 of Appendix A of ED118 does not consider growth rates and is not provided on a consistent basis, for example it covers different time periods, making it hard to undertake an informed comparison.
- 20) Table 3 below therefore uses the ONS’s 2014-based subnational population and household projections to provide an assessment of how Maidstone is expected to perform relative to the boroughs identified in Maidstone’s note. As can be seen from the table, ONS data show that out of all the boroughs considered, Maidstone is projected to have the highest level of population growth, at 19.1% between 2014 and 2031 compared to 9.8% in Tunbridge Wells. Furthermore, this population growth will be strongly driven by inward migration (both from elsewhere in the UK and abroad). Indeed, as the data in column C demonstrates, Maidstone has the highest level of net inward migration of all the boroughs considered, with 74.1% of its population increase being accounted for by net inward migration compared to 44.3% in Medway.
- 21) Headcorn Parish Council notes that the share of 15 to 69 year olds in Maidstone Borough is also expected to be higher in 2031 than in all other boroughs except Medway (see column E of Table 3). The ONS’s population projections do not a forecast of the economically active share of the population and only provide projections for population numbers in five year age brackets. This makes it hard to accurately match the growth in jobs needed to support the population increase. However, what is clear from the data is that the number of jobs needed for a given increase in population is likely to be higher in Maidstone than in the majority of other boroughs considered, given the age composition of the population increase.

Table 3: Comparison of population growth for Maidstone Borough and other identified boroughs

	Growth in population 2014–31 (%)	Growth in population 2014–31	Share of net migration in population growth 2014-31 (%)	Growth in the number of households 2011–31 (%)	Share of 15-69 year olds in 2031 population
	A	B	C	D	E
Maidstone	19.1%	30,900	74.1%	27.7%	65.1%
Swale	18.3%	25,700	73.2%	28.7%	64.7%
Ashford	18.8%	23,200	65.9%	31.4%	64.0%
Tonbridge & Malling	16.2%	20,100	61.2%	24.7%	64.6%
Tunbridge Wells	9.8%	11,400	60.5%	20.1%	64.3%
Medway	16.9%	46,300	44.3%	25.8%	67.5%

Note: All data are taken from ONS data sources. Columns A, B, C and E are based on 2014-based sub-national population projections and column D is for the sub-national household projections.

- 22) Headcorn Parish Council considers that these data illustrate the need to reassess the objectively assessed housing need for Maidstone Borough. It is clear that migration is driving population projections in Maidstone, which means that the growth is being determined by a part of the population that has no links to Maidstone Borough. Given the other problems associated with development in Maidstone, including unsustainable commuting patterns, addressing this issue would improve sustainability.
- 23) Headcorn Parish Council notes that the Inspector has concluded in his Interim Findings that evidence of distortions caused by oversupply do not warrant a reduction in the proposed housing target. However, Headcorn Parish Council still considers that the evidence shows that overshoots in planning permissions compared to planning targets has contributed to an increase in the household projections for Maidstone compared to elsewhere in Kent over and above what had previously been expected. In particular it notes that the ONS's 2008-based household projections envisaged that Maidstone would account for 10.4% of households in Kent by 2021, while the 2014-based projections envisage that it will account for 10.7% of households in Kent - in other words, housing growth has been accelerating faster in Maidstone than the average for Kent as a whole.¹ Given that Maidstone performs poorly in terms of sustainable commuting patterns compared to many other Boroughs in the South East, adjusting for the impact of this overshoot on housing projections would improve sustainability.

¹ Note, the 2008-based household projections only extend to 2021, meaning later comparisons are not possible.

IV. Commuting patterns

- 24) Headcorn Parish Council notes that in requesting additional evidence, the Inspector was keen to obtain a greater understanding of travel patterns and the linkages between different areas. Headcorn Parish Council notes that the analysis provided in ED118 contained only limited information on this subject. To help address this gap Table 4 below contains an analysis of commuting patterns for Maidstone Borough based on 2011 Census data.
- 25) As can be seen from the data, Maidstone has the second highest share of local residents commuting out of the borough for work. This demonstrates the dependence on jobs outside the borough amongst local residents. Even assuming that jobs growth in Maidstone over the plan period will be 14,400, expected jobs growth compares unfavourably to areas such as Ashford and Swale. Furthermore, as discussed in previous submissions, the estimate of 14,400 jobs should not be seen as the central estimate for jobs growth. Instead it represents the most favourable possible outcome forecast, with expected jobs growth likely to be significantly lower.
- 26) Headcorn Parish Council notes that of the six boroughs considered, Maidstone was the only borough in 2011 where London did not represent the preferred destination amongst those commuting outside the borough for work. This emphasizes the importance of not simply assuming that Maidstone is well placed to benefit from the London jobs market.
- 27) In the case of Maidstone, Tonbridge and Malling represented the main destination amongst out commuters. Analysis of commuting patterns by Maidstone residents within Tonbridge and Malling shows that 29.6% of commuters to the borough worked in the Tonbridge and Malling Super Output Area 005, which consists of the area around Ditton and encompasses Junction 5 of the M20. A further 20.5% of commuters from Maidstone to Tonbridge and Malling borough worked in Super Output Area 007, which includes Kings Hill where the headquarters of Tonbridge and Malling Borough Council are located.
- 28) Headcorn Parish Council notes that the importance of jobs in Tonbridge and Malling for employment amongst Maidstone residents is at odds with the pattern of development proposed within Maidstone's Local Plan. The Local Plan emphasises development in rural areas and in the south east of the urban area of Maidstone, rather than development to the north and west of the borough, which would be better placed to benefit from job opportunities in Tonbridge and Malling.
- 29) The argument presented in ED118 is that excess employment needs would be catered for by an increase in commuting to London. Headcorn Parish Council notes that Maidstone is clearly not well placed to support this pattern of growth without a significant reliance on car usage, contrary to sustainability considerations. Of the six boroughs analysed, commuters to London from Maidstone were most likely to commute by car, with 42.2% of commuters to London from the borough driving, compared, for example, to 18.4% of those in Tunbridge Wells and 29.1% of those in Ashford, where the use of cars for commuting to London was significantly lower. While car usage is still less prevalent amongst commuters to London than to many other destinations, the high level relative to neighbouring boroughs combined with the significant

distance travelled will have a negative impact on the relative sustainability of Maidstone Borough as an option for supporting the London jobs market.

- 30) Headcorn Parish Council has consistently argued that the distribution strategy underpinning Maidstone's Local Plan should be supported by a better understanding of how different areas perform, for example in the case of commuting. The last two rows of Table 4 therefore compare the performance of Urban Maidstone compared to the Rural Service Centres (RSCs). What is clear from that analysis is that the rural service centres are much more dependent on employment opportunities outside the borough, with only 41.7% of workers in the RSCs commuting to jobs within the Borough, compared to 53.9% for Urban Maidstone. Furthermore, commuters from the RSCs are much more likely to use cars on average, with car usage amongst commuters from the RSCs standing at 68.9%, compared to 60.5% in urban Maidstone. This means that even allowing for the fact that a higher share of commuters from the RSCs work in London and that only 27.1% of those travel by car, on average car usage amongst commuters from the RSCs is far higher than in any of the boroughs considered. This reinforces Headcorn Parish Council's concern that the distribution pattern for housing allocations within Maidstone's Local Plan is inherently flawed.
- 31) Finally, Headcorn Parish Council notes that the analysis presented in ED118 concentrates on changes in total out commuting, rather than net out commuting. Headcorn Parish Council considers that the impact of expected growth on net out commuting is likely to be more informative. This is because it does not rely on assumptions made about the distribution of jobs growth between residents and non-residents. Headcorn Parish Council notes that in 2011, all the boroughs analysed except Tonbridge and Malling had more residents commuting out of the borough than jobs in the borough. In some cases, such as Medway and Swale, these discrepancies were significant.
- 32) A comparison of column C and column D in the table on page 7 of appendix A of ED118 shows that all the areas except Swale and Tunbridge Wells are expected to see a larger increase in the workforce than in the number of jobs. This implies net out commuting is likely to increase in most areas and highlights the likely pressures in the surrounding jobs markets, suggesting that commuting distances are likely to increase over time reflecting greater competition for jobs. Combined with Maidstone's poor performance with respect to sustainable commuting options, Headcorn Parish Council again considers that this argues for the need to review the proposed housing target for Maidstone Borough.

Table 4: Analysis of commuting patterns for the boroughs identified in ED118

A	B	C	D	E	F	G	H	I	J	K	L	M	N
Place of usual residence	Place of work								Total out commuting	Net out commuting (resident commuters minus jobs)	% car usage	% car usage amongst commuters to London	Expected jobs growth (%)
	Ashford	Maidstone	Medway	Swale	Tonbridge & Malling	Tunbridge Wells	London	Share of jobs in areas listed in table in total					
Ashford	60.5%	6.4%	1.5%	1.6%	2.1%	2.5%	8.6%	83.1%	17,815	2,780	67.7%	29.1%	29.8%
Maidstone	2.6%	49.7%	6.7%	2.5%	12.1%	4.3%	11.9%	89.8%	31,095	1,116	67.1%	42.2%	23.7%
Medway	0.6%	7.3%	51.5%	4.0%	6.1%	0.6%	16.6%	86.8%	50,528	27,818	64.8%	41.8%	22.5%
Swale	1.9%	6.3%	9.4%	54.9%	2.9%	0.4%	9.8%	85.6%	22,904	10,305	67.8%	37.5%	27.0%
Tonbridge & Malling	0.8%	11.4%	5.3%	1.0%	36.5%	8.9%	20.3%	84.1%	30,499	-266	66.2%	38.0%	18.0%
Tunbridge Wells	1.1%	4.2%	0.6%	0.2%	9.2%	49.9%	19.1%	84.3%	22,176	2,060	56.0%	18.4%	21.7%
Urban Maidstone	2.0%	53.9%	5.9%	2.4%	13.4%	3.1%	9.5%	90.3%			60.5%	47.3%	
RSCs	5.5%	41.7%	4.2%	3.0%	8.0%	9.8%	17.6%	89.7%			68.9%	27.1%	

Note: Data in columns B to M are based on 2011 Census data and are taken from Table WU03EW. Data in column N uses the projected jobs growth for each borough from column D in the Table on page 7 of appendix A of ED118 and estimates the growth in jobs expected using the 2011 Census data for workers in England and Wales working in each borough from Table WU03EW. Therefore the forecast period covered by Column N is not consistent: for Ashford, Maidstone, Swale, and Tonbridge and Malling the forecast period is 2011-31; for Tunbridge Wells it is 2013-33; and for Medway it is 2012-37.

Each row gives the commuting patterns of residents in that borough or area. The cells highlighted in orange show the share of commuters living in the borough who also work in the borough as well. Cells highlighted in light green show the destination that accounts for the highest number of commuters from a borough or area (excluding the borough itself).

V. Review of Maidstone's Local Plan

- 33) Headcorn Parish Council considers that the Inspector's proposal that Maidstone should conduct a review of the Local Plan to be finalised by 2021 is extremely helpful. It will enable the remaining issues, including the need to gather additional evidence, to be addressed in a timely manner without leaving Maidstone exposed to the problems that can occur in the absence of an up-to-date Local Plan. However, Headcorn Parish Council considers that the terms of this proposed review should be strengthened to ensure that it properly deals with the issues that have been identified during the course of this examination process and that this will help to ensure that the Local Plan is sound. In particular, it would be helpful if the Inspector's proposal for the Review could explicitly identify the following issues:
- a) The need for Maidstone Borough Council to actively engage with Parish Councils and Neighbourhood Plan groups in order to develop a shared vision for development in individual areas. While Headcorn Parish Council welcomes the Inspector's proposal that Lenham's Neighbourhood Plan group should be involved in the identification of the sites for the Broad Location, it considers that this does not go far enough. The proposed review will inevitably lead to the need to assess development in other areas as well. Headcorn Parish Council considers that Maidstone's failure to work with Neighbourhood Plan groups during the development of its Plan makes finding the existing proposed Plan sound problematic, because of the conflicts with the Government's policy on Localism. Localism remains a key part of Government policy. For example, the Housing Minister Gavin Barwell emphasized the importance of Neighbourhood Planning in a written statement to parliament in December 2016. However, throughout the Local Plan process Maidstone Borough Council has continually resisted any policy changes that would give Neighbourhood Plans a role in shaping development within the areas they cover, contrary to Localism. Ensuring that Maidstone explicitly commits to addressing this gap as part of a Review will not only help improve the soundness of the existing Plan, it will also improve future iterations, by forcing Maidstone to recognise the need to change its approach in order for future iterations of the Plan to be judged as sound
 - b) The need to make better use of the Site Assessment Exercise underpinning Maidstone's Sustainability Appraisal as part of the site selection process. This change is needed as there are currently significant discrepancies between some of the sites that have been allocated through the plan process, with far more sustainable sites available both from an employment and a housing perspective.
 - c) The need to address the over reliance on rural areas in Maidstone's Spatial Strategy. As Headcorn Parish Council has made clear, its problem with Maidstone's spatial strategy has not been its decision to differentiate between different types of rural settlement per se. Its concerns have centred on the scale of development proposed for rural areas, which it considers is contrary to the definition of sustainability set out in the NPPF. Furthermore, Headcorn Parish Council notes that this policy potentially

conflicts with paragraphs 54 and 55 of the NPPF, which envisages a more dispersed approach to housing in rural areas.

- d) Headcorn Parish Council welcomes the Inspector's recognition that more evidence is needed to understand the links between housing provision, employment growth and commuting patterns. Headcorn Parish Council considers that the evidence provided in ED118 is not sufficient to properly inform any review and that a better understanding of the inter linkages is needed. Headcorn Parish Council considers that the Inspector should make clear that part of the review process should be to assess whether a reduction in Maidstone's housing target would be warranted, reflecting the fact that other Boroughs may be better placed to support sustainable commuting patterns. Given the high proportion of migrants in Maidstone housing projections (with no clear link to the Borough), such a review would help promote sustainability more widely.

Contact details

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

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