

Matter 2 .Overall approach: development targets, the settlement strategy and the distribution of development.

2.1 Does the modified Plan set out a strategy to deliver the area’s development needs over the Plan period?

No, because the allocation between Sittingbourne/Sheppey to that of Faversham is unfair, unjustified and unsustainable. The Infrastructure around Sittingbourne cannot cope (In particular the A2 and A249) while Faversham has room to expand with little impact on the Historic Centre as it positioned away from the A2.

2.2 Is the introduction of an indicative percentage split in MM40 justified and does it provide a clear and realistic guide for managing growth across the two planning areas?

No. The disproportional allocation in Sittingbourne and Sheppey (85%) to that of Faversham (15%) is unsound. The need for Housing in Faversham is as much if not more than Sittingbourne and Sheppey due to the lack of development so far. Supply and demand fuels the rate of house prices increases. Zoopla (Aug 2016) reported the following:

	Current Average Value	Percentage increase over the last 6 months
Faversham	309k	4.27%
Sittingbourne	259k	2.28%

Surely this demonstrates the need for a larger allocation of houses in Faversham.

2.3 Do MM41/MM42 provide a clear and flexible approach to monitoring delivery across the borough as a whole?

No. There are sites in Faversham (SW/778 Brenley Corner) as an example, which are more suitable and sustainable than AX6 (Newington) and would accommodate more houses. The infrastructure to this site is good with direct access to the M2 and Thanet Way, the site is large enough to create new amenities, i.e. shops, food outlets, and entertainment. To a great extent Faversham is protected and therefore more capable of mitigation as the historic centre lies away from the A2, unlike Newington where the A2 cuts right through the main settlement and therefore impacts cannot be mitigated.

2.4 Is the allocation of additional development sites in MM58 (Policy ST4) based on detailed and objective assessment of potential sites?

No. A report by **AECOM Infrastructure & Environmental JK Ltd dated Oct 2015** places SW/407 (AX6) in Tier E (list site associated with ‘significant environmental constraints’) with many sites throughout the Borough ranked A to D (lesser environmental constraints), in the ranking of Non allocated sites. AX6 is ranked 72 out of 87 of sites with the most environmental constraints. The Council are not considering the most sustainable sites.

2.5 Is the modified Plan based on an appropriate and justified approach to minimising the need to allocate the best and most versatile (BMV) agricultural land?

No. The National Policy Framework policy seeks to protect good quality agricultural land for Food security and the ability to feed a growing population and direct development to lower quality land. Brownfield and poor quality land should be used first. Paragraph 112 states. ‘Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should

seek to use areas of poorer quality land in preference to that of higher quality'. Other areas of lower Grade land and Brownfield are present within the Borough. The Council has not demonstrated that the NPPF guidance should be set aside, to use land of best and most versatile quality when alternative land of lower quality should be used in preference.

The **Councils response to Brownfield sites Environmental issues point 9 (SBC/CSR/5)** *'There is no support in Government policy to use brownfield land first.'* Is completely wrong as the Government do support the use of brownfield. In the **NPPF Core planning principles paragraph 17** states *'encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.'*

It would also be good to know how much land has been approved for building but is being 'Land Banked' by developers waiting for values to increase, has this been investigated by Swale Council as surely this should be given a priority before committing further land.