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Representor 1016243

Matter 2

Matter 2 relates to the overall approach: development targets, the settlement strategy and the distribution of development. MIQ 2.1 queries whether the modified plan sets out a strategy to deliver the area's development needs over the plan period.

In short, it does not.

By way of background information, the Local Plan Inspector previously issued interim findings on the emerging Local Plan in February 2016. Those interim findings concluded that, in order to fully meet objectively assessed needs, Swale Borough Council should plan for the delivery of 776 dwellings per annum, rather than the 540 per annum that were anticipated at that stage.

The main modifications are targeted at achieving that goal. As such, the total housing delivery anticipated in the plan period is 13,192 dwellings (up from the 10,800 previously planned for). This increase in housing numbers is detailed in Main Modification 5.

The text accompanying that Main Modification, however, states that in respect of the higher figure:

"We acknowledge that this will be challenging given slow economic and housing growth at the start of the plan period and the scale of step change needed in the performance of the housing market."

This would suggest that the actual realisation of the higher housing delivery target is in considerable doubt – especially in the shorter term - based on currently proposed housing allocations.

That being the case it would be prudent to allocate land for a greater number of dwellings, especially where there is evidence that development of any additional sites would (a) be sustainable, and (b) likely be delivered early in the plan period.

In terms of the issue of sustainability, paragraph 3.0.8 of the Main Modifications already recognises that:

Our vision also requires a settlement strategy that will direct the greatest scales of growth to the most sustainable locations as represented by the main urban areas and <u>most accessible villages with a range of local services.</u>

Currently 88% of proposed residential allocations are focussed in and around the main urban areas of Sittingbourne (which has 44% of the total borough allocations by itself), Faversham, Sheerness, Queenborough and Minster. In this context there is a definite logic to targeting some further growth at the next tier settlements (Rural Local Service Centres) which are most accessible and which benefit from a range of local services.

To act upon this recommendation would accord entirely with the direction provided by the National Planning Policy Framework that Local Planning Authorities should significantly boost the supply of housing. This conclusion correlates with our conclusions drawn in relation to Matter 9, and which relates to the five year housing land supply issues.