



Your ref: Matter 2 'Overall Approach'
Our ref: JB/RB/1436

12 January 2017

Lynette Duncan
Programme Officer

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Dear Lynette

RESUMED HEARINGS - SWALE BOROUGH LOCAL PLAN

MATTER 2 - OVERALL APPROACH

1) SETTLEMENT STRATEGY; 2) DISTRIBUTION; 3) TWO AREAS

Thank you for the opportunity to provide further comment on the resumed hearing matters as part of the Swale Local Plan Examination Process.

HOW Planning has been instructed on behalf of Preston Field Land Trustees (PFLT) to submit representations in relation to "Matter 2 - Overall Approach". The representations support the overall approach in the preparation of the emerging Swale Local Plan.

BACKGROUND

LOCAL PLAN REPRESENTATIONS

HOW Planning prepared and submitted a Hearing Statement to the Swale Local Plan Part 1 ("the Local Plan Part 1") Examination in Public on behalf of PFLT in 2015.

Representations were also submitted to the Council on behalf of PFLT to the Publication Version (December 2014) consultation. The representations were accompanied by a Transport Appraisal (May 2012) and a Landscape and Visual Impact Assessment (May 2012). In summary, the representations advised:

- The submitted Transport Appraisal undertook an assessment identifying that there are a number of options that could be implemented to successfully accommodate new traffic generated by the site.
- The submitted Landscape and Visual Impact Assessment (LVIA) concludes that the site is quite well contained within the wider landscape, which is aided by surrounding urban fringe land uses, topography of the land and existing landscaping and tree belts. Any development of the site is recommended to take advantage of the lower parts of the site in the valley bottom. Overall, the LVIA concludes that the development of the site could be integrated with the urban area and would not have any significantly adverse impact upon the wider landscaped area.

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Following the publication of the Main Modifications Local Plan, HOW submitted representations to the Council on the 8th August 2016. Within this representation, a case was presented which confirmed the Applicant is able to deliver the site and also to alter Policy to read as follows:

"Planning Permission will be granted for a minimum of 250 dwellings, landscape and open space on land at Preston Fields, Faversham"

SUPPORTING DOCUMENTS AND OUTLINE PLANNING SUBMISSION

PFLT has submitted an outline planning application, with all matters reserved other than access, for up to 250 dwellings on the land at Preston Fields. The application has been validated and allocated reference number 16/508602/OUT.

PFLT finalised a full suite of technical documents which has formed the background and supporting information for planning application 16/508602/OUT, namely highways, biodiversity, landscape and visual, heritage, flood/drainage and ground conditions. The findings demonstrate that the site can be developed for residential purposes whilst maintaining and enhancing both the ecological and landscape value of the site with no resultant adverse impacts.

COMMENTS IN RELATION TO MATTER 2 "OVERALL APPROACH":

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

Following the uplift in housing numbers the Preston Fields site was allocated by the Council to meet the new high target of 776 dwellings per annum (13,192 dwellings until 2031). PFLT consider that the Council's approach in terms of determining the additional level of growth required, the distribution and the identification of the two planning areas; namely the Thames Gateway and the rural areas to be sound.

PFLT consider that the modified Plan sets out a clear strategy to deliver the area's needs over the plan period.

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?

PFLT agrees with the indicative percentage development split between the Swale Thames Gateway and Faversham (and rest of Swale) planning areas. This is an important element of the Local Plan Strategy and the modifications deal with the additional allocations necessary to meet a housing target of 13,192 dwellings to 2031 (776 dwellings per annum) and a five year supply of housing land. It outlines proposals for new sites to be allocated in Sittingbourne, Faversham, Minster and Halfway, Iwade and Newington.

The same housing distribution strategy, with the uplift in housing numbers would have created a proportional split of 11,477 and 1,715 homes respectively (maintaining an 87%/13% split). The proposed allocations in the Proposed Modifications create a proportional split of 12,053 and 2,121 homes respectively (resulting in an 85%/15% split between the two spatial areas).

The introduction of an indicative percentage split in MM40 is justified and provides a clear and realistic guide for managing growth across the two planning areas.

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

MM41 and MM42 provide a clear and flexible approach to monitoring delivery across the borough as a whole as it will help the council maintain and ensure a 5 year supply of deliverable housing land and combat the existing housing shortfall.

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

The allocation of additional development sites is based on the need for the Council to meet a higher housing target of 776 dwellings per annum.

PFLT considers that the allocation of additional sites in MM58 (Policy ST4) is based on detailed and objective assessment of potential sites. The allocation of the additional sites will help meet the Council's housing need and reduce its housing deficit.

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?

PFLT consider that the modified plan is based on an appropriate and justified approach to minimising the need to allocate the best and most versatile (BMV) agricultural land. The Emerging Local Plan indicates that some 70% of 23,000ha of agricultural land in Swale borough is BMV land. Inevitably, to meet housing requirements there will be a loss of BMV land in Swale borough but this will not be of no detriment to the future production capacity of the agricultural/horticultural industry in Swale, nor are there any adverse implications in terms of the availability of Best and Most Versatile Land regionally or nationally.

SUMMARY

In summary, PFLT strongly supports the overall approach detailed in the main modification to the emerging Local Plan.

I would be grateful if you could please confirm safe receipt of these representations by way of return. Please do not hesitate to contact me if you wish to discuss these representations further or if the Council requires further technical information to be provided to support the submission.

Yours sincerely



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