



Swale Borough Local Plan Examination

Day 1: Matter 1 – Procedural matters Matter 2 - overall approach/settlement strategy/distribution

Tuesday 31 January

The Crown Estate (ref: 73427)

Matter 2 - overall approach/settlement strategy/distribution

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

- 1.1 The Crown Estate considers that the inclusion of a higher development target of at least 13,192 dwellings (776 dpa) outlined in modification 42 (Policy ST2) will enable the Council to more adequately address housing needs over the Plan Period compared to the previous target of 540 dpa included in the Submission version of the Plan. This provides a sounder basis to plan for development needs over the Plan Period. In this respect it is considered the modified Plan is now sound because:
- ▶ It is justified: the development target is based on the Council's latest evidence of housing need. A target of at least 776 dpa will enable the Council to meet the OAN (as identified by their own evidence base). This provides a far more appropriate basis to plan for longer term needs in the Borough;
 - ▶ It is effective: the modified Plan now provides a sound growth strategy which more adequately tackles the significant development needs in the Borough through the increase in the housing target and the allocation of further sites; and
 - ▶ It is consistent with national policy: the modified Plan now complies with national planning policy, particularly reflecting advice in paragraph 47 of NPPF which states that to significantly boost supply, local planning authorities should *"use their evidence base to ensure that their Local Plan meet the full objectively assessed needs for market and affordable housing."*
- 1.2 The Crown Estate supports the Council's proposed approach of identifying a range of additional sites to save placing reliance on a few large greenfield options and windfall sites. The identification of alternative smaller options such as The Crown Estate's land at Belgrave Road Minster (AX2) will provide flexibility in supply and allow the Council to more quickly respond to fluctuations in delivery compared to the approach set out Local Plan Submission version. This will provide a sounder basis to plan for future needs rather than relying on large sites to deliver which have a lead in time and higher on-site infrastructure costs which could slow delivery.
- 1.3 The proposed modifications to the Local Plan, including additional allocations will also assist the Council in demonstrating a favourable five year land supply position. The Council's current five year supply of housing land is marginal. Latest information (SBC/PS/113) suggests that the Council can only currently identify a 5.4 year supply if the Liverpool method is applied. This point emphasises that all proposed allocations, including those identified through the modifications procedure such as site AX2 'Land at Belgrave Road, Minster' will be required to boost supply given the Council's marginal



housing land supply. This will assist the Council in resisting unwanted applications in less sustainable locations which do not support the Council's overall strategy.

Question 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?

- 1.4 The Crown Estate supports proposed modification 40 which identifies the bulk of growth being delivered in the Swale Thames Gateway which includes the Isle of Sheppey. The proposed percentage split does not substantially change the strategy from the submitted Plan with a focus on sustainable locations and the desire to plan for the linked provision of homes and jobs. The settlement strategy is considered sound and consistent with national policy. The split between the two planning areas provides a balance between focussing development on the largest settlement in the Borough (Sittingbourne) and a consideration of its environmental constraints. It provides more clarity on the Council's approach to tackling the regeneration needs of Swale Thames Gateway. The Council's SA of the Swale Local Plan (SBC/PS/105b) also concludes in paragraph 7.2 "*... there is a need for growth at other locations, principally the Isle of Sheppey where sites can be provided on lesser constrained sites, whilst maximising the use of sustainably located BMV in a way that too reflects Sheppey's overall position within the Thames Gateway.*"
- 1.5 Not only will the proposed settlement strategy support regeneration objectives for the Thames Gateway, it is also consistent with the identification of the West Sheppey Triangle through policy ST3. This identifies a significant growth emphasis in the area to meet significant regenerations needs. Sheerness is the main town but is not able to meet all of its own needs. Therefore, settlements in the West Sheppey Triangle including Queenborough and Minster will be expected to meet development needs to support a linked strategy for the provision of homes and jobs.

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

- 1.6 The Crown Estate considers that the process of justifying the modifications including the increased housing target and the additional allocations to make up the shortfall are clearly justified through the revised Sustainability Assessment process. In line with the four tests of soundness particularly, "*justified*", the Plan now presents the most *appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence* (emphasis added).
- 1.7 As we demonstrate in our response to matter 4, the proposed allocation of land at Belgrave Road, Minster (policy AX2) is clearly justified by the Council's robust and extensive evidence base and the site can assist the Council in meeting its immediate development needs in a highly sustainable manner. It is not covered by any strategic constraints which would prevent development.

Question 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?

- 1.8 The Crown Estate considers that in identifying additional allocations the Council has given due consideration to advice in NPPF, paragraph 112 which requires local planning authorities to take into account the economic benefits of the protecting the best and most versatile agricultural land and seek to use areas of poorer quality land where significant development on agricultural land is necessary. Document SBC/PS/117: Appendix 2 – SBC/CSR/2 confirms that Sheppey is one of the few areas in the Borough with extensive areas of lower quality agricultural land. As noted in the Sustainability Appraisal (reference CD/003, paragraph 12.3.11) land at Belgrave Road, Minster (Policy AX2) is lower quality agricultural land. This is also confirmed by the Sheppey Agricultural Land Maps (reference SBC/PS/022c).



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