

Written reps only:

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Matter 2

AX6 Local Plan 160+161

**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, the allocation between Sittingbourne/Sheppey compared to that of Faversham is unfair, unjustified and sustainable. The Infrastructure around Sittingbourne cannot currently cope yet Faversham has significant expansion room without the need to impact the Historic Centre.

**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 unfair and not justified. The housing need in Faversham is higher than Sittingbourne and Sheppey because of the rate of existing development.

**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), 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 M2 and Thanet Way without it being necessary to traverse Faversham, the site is large enough to create new amenities, i.e. shops, food outlets, and entertainment. Faversham is much protected and therefore easily 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. In addition there is a greater customer want for housing in Faversham with many locals having to move away from Faversham because they cannot find suitable housing.

**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 must take notice of the sites rankings in this report because of their sustainability; potentially therefore 71 sites should be considered for allocation before AX6. To do other is nonsensical and unfair.

**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 are available within the Borough, this includes Sheppey, land North of Faversham and the Boroughs Southern borders. The Council has not demonstrated that the NPPF guidance should be

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set aside taking the best agricultural land and when alternative land of lower quality could and 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.'* This is incorrect. The Government supports the use of brownfield land first. 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.'*