

OBJECTION RESPONSE FOR “MUX1a”

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Representor ID: 875290

LP Refs: LP 1853 & LP 2233

Modification Number: 192

POLICY MUX1 Land at South West Sittingbourne

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January 2017

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1.0 SUMMARY OF REPRESENTORS' OBJECTION to MUX1:

- 1.1** Mulberry Estates supports the principle of a sustainable urban extension at South West Sittingbourne in the location identified in Main Modification 192 as set out in the Plan and our representations of support. We concur with the Council's evidence, insofar as it relates to this site, that MM192 would make a major contribution towards achieving a sound Plan, not least by providing houses where there is strong market demand in a manner that is consistent with the Council's spatial strategy along with all necessary infrastructure and well within the plan period. Thus the site will play a critical role in helping to plug the shortfall of deliverable sites that was identified in the Inspector's Interim Findings.
- 1.2** Despite that support, we object to the proposed policy and draft development diagram as currently published. We consider that a westward extension of the allocation, including a link to Chestnut Street, would offer significant advantages to the soundness of the Plan and in particular, to the satisfactory delivery and implementation of its policies. The principles are shown on a revised strategic diagram for the site **Appendix MD – SWS MUX1a-1**
- 1.3** The additional strategic highway link that will be facilitated by an extended allocation will not only ensure that traffic generated by the proposed allocation will be adequately accommodated but also it will assist traffic flows and capacity across the wider network that will serve other development allocations within the plan. In so doing, it would provide much-needed infrastructure enhancements to serve the greater Sittingbourne area and the A2 and A249 corridors in particular.
- 1.4** This objection shows how revisions to the extent and capacity of the draft allocation, together with additional highway links, would result in significant planning benefits. The suggested revisions include the extension of the site westward to link with Chestnut Street, the incorporation of new sports facilities to meet the needs of the Sittingbourne Rugby Union Football Club ('SRUFC') within the allocation, and an increased overall residential capacity to a minimum of 675 dwellings. We refer to this alternative proposal as 'MUX1a'.
- 1.5** A planning application for MUX1a (including a westward extension of the MUX1 site to Chestnut Street) has been prepared in full consultation with the Council and local residents and in accordance with all relevant policies comprised within the Submitted Local Plan. All of the environmental impacts arising from the proposed development have been assessed and are available to the Examination. A summary of these findings is included in this representation.

2.0 RESPONSE TO THE INSPECTOR'S QUESTIONS

Is the MUX1 allocation: Justified by robust evidence, including landscape character assessment and sustainability appraisal as the best option for delivering the Borough's housing?

Landscape – The Council's Landscape Evidence

- 2.1 The Council has commissioned a full *Landscape Capacity Appraisal and Landscape and Visual Impact Assessment* (December 2016; SBC/PS/118) of the proposed MUX1a based on *The Guidelines for Landscape and Visual Impact Assessment – Third Edition ('GLVIA3')*, an industry-standard approach.

Landscape – The Respondent's Landscape Review

- 2.2 On behalf of the Respondents David Williams Landscape Consultancy ('DWLC') has undertaken a full landscape analysis, including a Landscape and Visual Impact Assessment ('LVIA') and a review of the Council's Landscape Assessment for MUX1a. It has also reviewed the Council's SA, Addendum and Erratum insofar as they relate the site.
- 2.3 Whilst DWLC generally agrees with the Council's assessment insofar as it relates to MUX1 as proposed in the Main Modifications, it disagrees with the conclusions insofar as they relate to the larger area, primarily due to an incorrect interpretation of the development proposals. A response to the Council's conclusions is at **APPENDIX MD-SWS MUX1a-2**.
- 2.4 DWLC has considered specific landscape impacts that might arise due to the proposed uses and activities associated with the primary school and sports pitches. It has also considered the temporary landscape impacts, which might arise during the construction phase together with an analysis of long-term landscape impacts at the completion stage. A summary of these analyses is attached **APPENDIX MD-SWS MUX1a-3**

Sustainability Appraisal

- 2.5 The Council has commissioned a Sustainability Appraisal Addendum ('SAA') to support the proposed allocation. In that document the site is referred to as 'SW/703 South-west Sittingbourne'.
- 2.6 The site scores very well in terms of access to facilities and, indeed, the SAA recognises (e.g. see 9.14.2) that the proposed allocation requires a significant amount of infrastructure, which will contribute to the sustainability not only of this urban extension, but also of the adjoining urban areas.

Air Quality

- 2.7 Like many sites, including other site allocations, the site scores poorly in terms of air quality but it is recognised (page 66) that air quality is generally an issue at Sittingbourne The Site does not fall within an Air Quality Management Area ('AQMA'), although two exist in Sittingbourne at East Street and St Paul's Street.

- 2.7 Dispersion modelling has been carried out to assess air quality at the site and consider its suitability for residential use. In addition the impact of traffic generated by the proposed development on local air quality has also been predicted.
- 2.8 The assessment has shown that all pollutant concentrations are predicted to be below the relevant objective limits across the site and it is therefore considered suitable for residential development. The impacts associated with additional traffic from the proposed development are also predicted to be negligible.
- 2.9 Development of this site and the associated highways improvements (on and off-site) will reduce congestion and thus provide betterment to air quality for a significant number of residents in the wider area. We anticipate that the benefits will be greater than for the MUX1 site, primarily because of the potential of a direct link between Borden Lane and Chestnut Street to redistribute east-west (and *vice versa*) traffic movements away from the existing urban area.

Countryside Gap / Agricultural Land

- 2.10 In the SAA the MUX1 site also scores poorly in terms of 'countryside gap' and 'agricultural land'. This is not a unique situation amongst site allocations, nor does it suggest that the proposed allocation is any less sustainable than other potential development locations. For example two sites at Iwade also score red on both of those criteria and, generally, the proposed site allocations score between two and five reds.
- 2.11 With regard to the countryside gap the SAA does recognise that whilst development would significantly lessen the gap between Borden and Sittingbourne, a considerable gap would remain, and that this is a large site where there is good potential for landscaping. The conclusion does not change for the MUX1a area and this consideration should not represent an impediment to allocation, therefore.
- 2.12 With reference to the sites to the south, southeast and southwest of Sittingbourne, the SAA notes that it is very difficult to confidently differentiate between the sites and that all three sites would, to one degree or another, involve the loss of some BMV land.
- 2.13 The strategic landscape buffer strip along the southern portion of the site is to be gifted to either Borden Parish Council, or another publicly accountable body approved by the LPA, to ensure that the countryside gap is maintained and controlled to prevent future development to the south of the site.

Is the MUX1 allocation: Deliverable within the Plan period?

Deliverability

- 2.14 With reference to footnote 11 of the NPPF, the site is available now and is a suitable location for development now. There are no ownership impediments to the delivery of the site or any other impediments such as village green applications or the like, including in relation to the additional land towards Chestnut Street. Since submitting its objections, Mulberry Estates has formed a partnership with Quinn Estates, an experienced local developer.

- 2.15** As well as having a demonstrable track record in delivering new homes; Quinn Estates has delivered more commercial space and mixed-use development than any other developer in the last decade in Swale Borough.
- 2.16** There is a realistic prospect that housing will be delivered on the site within five years. The delivery programme remains as submitted to the Council in August 2016 **Appendix MD-SWS MUX1a-4**. Pre-Application meetings have been held with Swale Borough Council, Kent Highways and Highways England officers throughout the last year to establish the full range of assessments required for an outline planning application for the MUX1a area. Discussions with highway authorities has identified scope to deliver interim mitigation at J5 of M2, which would permit the development to be brought forward prior to securing of the longer term improvements An EIA Scoping Report has provided for the full range of impact assessments required for an application and these analyses are now complete.
- 2.17** An outline planning application is to be submitted early in 2017 and we envisage securing an implementable planning permission by the summer 2018 (following approval of the first phase of reserved matters) and delivery of the first house before the end of that year. 25 homes would be delivered during the 2018/19 monitoring period and 60 homes per annum thereafter to complete the whole development by 2029/30.

Is the MUX1 allocation: Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?

Infrastructure to be provided

- 2.18** The proposed Sittingbourne urban extension will deliver a variety of infrastructure and services to enable the proposed development to function well and to maximise the sustainability of the local community. The Representor agree to the following being included in the site allocation:
- new roads to serve the development as well as a ‘spine road’ between Borden Lane and Chestnut Street (as illustrated at **Appendix MD-SWS MUX1a-1**);
 - public transport to serve the development;
 - pedestrian and cycle links to the adjacent network;
 - a two-form entry primary school that is designed to facilitate expansion to a three-form entry school in future, if needed (discussed further below);
 - a sports clubhouse that can be shared for other activities by the local community;
 - grass playing pitches;
 - a neighbourhood retail shop;
 - a medical centre;

- allotments; and
 - open space to serve new and existing residents.
- 2.19** The development will also deliver all necessary utilities (water, gas, electricity, telephony, sewerage and drainage (including SuDS)).
- 2.20** Any other infrastructure needs that arise can be dealt with by CIL / a section 106 agreement including older children / adult education, social care and libraries. As is conventionally the case we envisage that staged payments would be made prior to occupation of an agreed number of dwellings.
- 2.21** If CIL is applicable, the Respondents reserve the right to request that the delivery of infrastructure that serves more than the MUX1a site be treated as a 'payment in kind'.

Phasing of Development & High-level Programme

- 2.22** MUX1a could be phased as follows, as illustrated on the phasing plan at **Appendix MD-SWS MUX1a-9**:
- **Phase 1a** – Western Area – area between Chestnut Street and Wises Lane (North), 300 dwellings, primary school, local community/social centre. Sports Pitches and Strategic screen planting. To commence in 2018/19;
 - **Phase 1b** – Eastern Area – junction at Borden Lane, 80 dwellings. To commence in 2023/24; and
 - **Phase 2** – Central Area – connecting spine road, 270 dwellings. To commence in 2024/25.
 - The Community facilities at the new rugby club facilities and sports pitches are anticipated to be provided by the end of 2019 and will be accessible via the existing Wises Lane / Cryalls Lane.

Transport

Off-site Highways Works

- 2.23** The proposed development would continue to be supported by a series of off-site highway interventions to mitigate the impact of development, as with original MUX1 proposals, but with increased potential to provide overall betterment. The alternative proposal looks to enhance the link between Borden Lane and Wises Lane (North) through the site, by introducing an extension of the link through to Chestnut Street and forming a new junction here, along with an enhanced egress directly on to the A249. As with the original MUX1 proposals, but more so, this link is the most apparent form of mitigation to the local network. The link will continue to provide a supplementary parallel route to the A2, with this extending to the A249 and effectively bypass the constraint of the Key Street junction.

- 2.24** Existing traffic travelling to and from the southern areas of the town will, as with MUX1, have the option to utilise this route avoiding the congestion junctions between the A2 and Adelaide Drive and Borden Lane and altering the pattern of movement at the Homewood Avenue junction to improve performance. However, as noted there is scope for outbound traffic from these areas of Sittingbourne, as well as others, to divert to this route for accessing the A249 directing and this avoiding the need to pass through the Key Street junction. As a result, the extended link provides mitigation of Key Street, something identified as necessary to support the Local Plan and the main modifications.
- 2.25** As with MUX1 and to support this reassignment, appropriate access junctions will be formed with Borden Lane, Wises Lane and Chestnut Street. The signalisation of Wises Lane remains a possibility, however the aim is that the majority of traffic would be focused and managed to not utilise this route. Early phasing to provide interim mitigation or longer term demand requirement may require delivery of this measure.
- 2.26** Analysis work is on-going, in accordance with a scope agreed with the highway authorities and as set out in **Appendix MD-SWS MUX1a-115a**, to ascertain the need for further mitigation at Key Street, identified as necessary in the Local Plan with main modifications scenario. It is anticipated that considerable mitigation will be achieved through the diversion of traffic away from Key Street

Traffic Management Measures

- 2.27** To ensure that traffic is effectively encouraged to utilise the preferred routes, further traffic management measures are anticipated. These include traffic calming on Borden Lane, in particular in to the south of the proposed access roundabout.

Education (Phase 1a)

- 2.28** The site promoters intend to provide land and buildings for a 2-form entry Primary School within the site. The proposed development of about 675 homes generates a need for a 1-form entry school. However, in consultation and with the full support of the Barrow Trust, The Diocese of Canterbury (Education and Property) and Kent County Council, it is proposed to construct a 2-form entry school to also accommodate the pupils from Borden Church of England Primary School. This is no longer considered fit for purpose since half of the playground area is currently unsafe due to the disintegration of the chalk cliff and also because the fabric of the building is poor and offers cramped and inefficient facilities. The school is poorly located on an isolated and narrow lane on a tight bend with parking and road safety concerns. Moreover, it would not be possible or desirable to expand or rebuild the existing school. Correspondence from The Barrow Trust is attached: **APPENDIX MD-SWS MUX1a-5** and also from the Canterbury Diocese: **APPENDIX MD-SWS MUX1a-6**
- 2.29** The land and service infrastructure for the new school would follow KCC's model to 'future proof' it by allowing for cost-effective expansion to 3-Form Entry, if required in the future.

Social (and sports) Provision

- 2.27** Sittingbourne Rugby Union Football Club (SRUFC) currently occupies premises at Gore Court beside the Wisles Lane/London Road (A2) junction. It is one of the largest Clubs in Kent, with a long track record of supporting local sporting, community and social groups, clubs, schools and the general public. The site promoters intend to provide the Club with a very long lease (125yrs) to give it long-term security and the means to expand its range of activities. This will include a clubhouse, which will be available for social and community activities for new and existing residents within the area. A letter outlining the Club's history, current and future role within Sittingbourne is attached: **APPENDIX MD-SWS MUX1a-7**. As a developer-funded education facility, it is also intended that facilities at the new Primary School will be available for wider use outside normal school hours

Healthcare Facilities – Phase (1a)

- 2.30** The respondents are working closely with a specialist primary care centre developer (General Practice Investment Corporation Ltd), in order to provide a Medical Centre within the development.
- 2.31** GPI has delivered over 120 new facilities nationwide. Its model requires the developer to assume the risk and costs associated with procuring a new medical facility and obtaining the NHS funding required to deliver it. It then undertakes construction and long-term ownership with the practice occupying the premises under a simple occupation lease in line with NHS guidance.
- 2.32** Healthcare facilities will be delivered as part of the overall development, comprising a local medical / healthcare centre to be available to new and existing residents on the Phase 1a land. Thus it is anticipated that these will be delivered within the first three years of the scheme.

Open Space – All Phases

- 2.33** Development of the site will include a significant amount of open space that will be made available as each of the main phases progresses. This is illustrated on the drawing at **Appendix MD-SWS MUX1a-8**.
- 2.34** On the southern edge of the site to the west of Wisles Lane there will be significant landscape buffer with structural tree planting. To the south and associated with this will be a significant area of publicly accessible open space extending to approximately 17 hectares. This will include making available, land to either side of the access from Borden Lane, also providing a buffer to Auckland Drive.
- 2.35** Throughout the site will be a network of connected spaces 'Greenways' that will create gaps between parcels of residential development. Such space is intended to provide opportunities for informal play, dog walking and general amenity and could include play-space provision as well as seating and so on.

Is the MUX1 allocation: Supported by evidence at this stage to have reasonable certainty that the amount of development will be deliverable within the plan period?

- 2.36** Yes. As outlined above a planning application for the MUX1a site is to be submitted in early 2017 together with a timetable of delivery. Evidence of local market demand has been obtained from house builders and agents currently marketing homes in and around Sittingbourne. The delivery of 60 homes per year is the minimum expected, assuming affordable housing *pro rata* at 12%. This is above the 10% policy requirement set out in DM8 of the Plan (para. 6.6.47) for urban extensions at Sittingbourne and for this site in particular. This is further detailed in Examination document 2015/CD-13a. This delivery figure could double with more than one house-builder delivering homes from the allocation.

Is the MUX1 allocation: Supported by clear and deliverable measures to address transport implications of the proposed development?

- 2.37** Based on the scope agreed with the respective highway authorities, we have undertaken appropriate traffic surveys and have produced a Transport Impact Analysis (TIA) in association with the draft planning application for MUX1a. The cumulative effects (taking account of other committed development sites) have also been considered.
- 2.38** With advice from the Borough Council, Highways England and Kent County Council and together with other developers/promoters of sites that could affect the A249, we are engaged in a study of potential transport impacts on the A249 corridor and its junctions. The scope and methodology for this work has been agreed and is included within the Council's Examination submissions. A **Statement of Common (Transportation) Ground** will be submitted shortly.
- 2.39** Despite this work being incomplete, it is already clear that there are identifiable and deliverable highway capacity enhancement measures, available to ensure the deliverability of the Plan's existing and Main Modification developments.
- 2.40** The additional highway link to Chestnut Street that would be secured by the development of MUX1a provides a strategic opportunity to aid traffic connectivity to the A249 primary route whilst also easing capacity on the A249 / A2 roundabout at Key Street. Details of this are set out at **Appendix MD-SWS6a**.
- 2.41** As noted in the previous sections, this strategic connectivity between Borden Lane and Chestnut Street, with retained secondary connection to Wises Lane, will provide wider benefits to the local network. Key areas of benefit will be the junctions between Adelaide Drive, Borden Lane and A2, as well as Homewood Avenue. The option to reassign on to the new strategic link will reduce congestion in these areas and will also aid to reduce the appeal of 'rat-running' through the villages to the south of Sittingbourne. In part, this rat-running is encouraged by the delays in joining/leaving and progressing along the A2.

- 2.42** The proposed infrastructure allows the full benefits of the improvements to the Stockbury Roundabout, which removes the other key motivation to rat-running, and together will minimise future occurrences of this activity. In the absence of the strategic link provided by MUX1a, aspects of local congestion will remain, retaining some of the motivations for drivers to rat-running, albeit at levels not severe relative to existing levels.
- 2.43** As noted previously; the alternative proposals afford an additional benefit in the form of potential interim mitigation of the strategic network prior to both further improvements to the Key Street roundabout or Stockbury. Through careful phasing, even early phases of development, MUX1a affords the scope to deliver mitigation through carefully managed reassignment of traffic across the network, making most effective use of the network in the interim period.

For the MUX1 allocation: Have flood risk, heritage, wildlife and biodiversity aspects of the site been taken into consideration?

Flood Risk & Contamination

Flood Risk

- 2.44** A Flood Risk Assessment has been undertaken for the area covered by MUX1a in preparation for the planning application. The land is remote from coastal (tidal) flood areas. Whilst there are areas at risk of fluvial flooding nearby (to the east of Borden Lane and to the west of School Lane), they do not affect the development potential of the site. The SBC Strategic Flood Risk Assessment is based on the most recent modelling of the flood plain in the local area. This confirms that the whole of MUX1a site lies within Flood Zone. The development will incorporate SuDS to mitigate surface water run-off and appropriate on-site infiltration testing has been conducted to demonstrate that the ground conditions are appropriate to support sustainable, infiltration-based surface water discharge. Kent County Council supports these concepts and the overall principles in their role as the Lead Local Flood Authority.

Contamination

- 2.45** The site has remained largely undeveloped with earliest historical mapping showing the area as open fields with public footpaths and a residential dwelling close to the central northern boundary. By the turn of the nineteenth century, an orchard was established in the southern and southeastern areas of site. Locally, two small chalk pits were located adjacent to the eastern boundary and south southeastern boundary of the site (off site). The southeastern pit was later filled with inert, commercial, household and liquid sludge waste. Historical industrial land uses have also been identified within 250m of site, comprising a transport depot and sawmill.
- 2.46** The respondent's specialist consultant Ecologia, has completed an extensive Geo-Environmental Assessment for the whole site. This does not identify any significant contamination.

Heritage

- 2.47** The June 2016 *Sustainability Appraisal Addendum* identifies the following heritage considerations:
- the proposed access road linking the site to Borden Lane would pass adjacent to a listed building (Cryalls Farmhouse) which is currently passed by a footpath to Borden;
 - access to the site from the south leads to the potential for traffic impacts to three nearby CAs and rural lanes; and
 - archaeological sensitivities in this area.
- 2.48** A preliminary desktop assessment of the potential heritage impacts been undertaken – see **Appendix MD-SWS MUX1a-10**. Whilst a range of designated and non-designated assets was identified, none would be lost by development of this site – most are some distance from the areas where housing would be built.
- 2.49** The asset with the greatest potential to be affected is the Grade II-listed Cryalls Farmhouse, which sits between Cryalls Lane and Russell Court, with more modern housing close by. Despite its name, it no longer functions as a farmhouse – it appears to be a private dwelling. The location of this is indicated on the drawing at **Appendix MD-SWS MUX1a-1**. The building’s relationship with the wider landscape has, to some extent already been eroded by development dating from the second half of the twentieth century nearby. Whilst a physical relationship still exists with undeveloped space to the south, the historical and functional relationship no longer exists. The setting of the building is heavily influenced by relatively dense tree coverage both within and without the curtilage of the building, such that there is very limited visibility of the building. Consequently, whilst there will be some change to the heritage asset’s setting as a result of development of the MUX1a site, it will be limited and not of an extent that should give rise to a need to reconsider the extent of the proposed allocation or the indicative location of development on the MUX1a site.
- 2.50** There may also be some secondary effects on heritage assets – in particular on the character of conservation areas – as a result of increased traffic. Consideration of this change must take the existing situation as the baseline and that is a situation where there are already steady flows of traffic through those assets. Additional traffic – both temporary (as a result of construction) and permanent (from users / occupiers of the development) – will not change the character of those heritage assets to a significant extent.

Archaeology

- 2.51** Historic maps and documents were reviewed to trace the historic formation and use of the land that forms the Site, showing that most was used for arable cultivation as far back as 18th century. Orchards were present in the northeast and south east of the Site and a field between Wises Oast Business Centre and Borden Nature Reserve. Aggregate extraction for clay and chalk has taken place in two areas in the south east corner between Cryalls Lane and Borden Lane to the south of Cryalls Farm.

- 2.52** A baseline of Heritage Assets within a study area of 1km radius from the boundary of the Site was generated from the records in the Kent County HER, supplemented by other documentary sources. Statutory designated Heritage Assets, represented by Conservation Areas, Listed Buildings and sites with Protected Military Remains are present within the Study Area, but none are located within the Site. No Scheduled Monuments or Historic Parks and Gardens are present.
- 2.53** Analysis of the Non-designated Heritage Assets data in the landscape established that the main potential for additional Heritage Assets within the limits of the Site are represented by buried archaeological deposits. The data indicated low potential for Palaeolithic, Mesolithic to Bronze Age and Anglo Saxon archaeology, medium potential for Roman and Medieval features and high potential for Late Iron Age / early Roman and Post Medieval archaeology associated with Pickets Farm.
- 2.54** Historic soil erosion and intensive cultivation, particularly orchard planting and renewal, are estimated to have had a general medium to high adverse effect on the archaeological potential of the Site. Aggregate extraction removing geological deposits had a total adverse effect on the archaeological resource in two areas. Recent reversion of areas to scrub and animal burrowing in places is likely to have had a low to medium adverse effect on the archaeological potential.
- 2.55** The adverse effects of the proposed development on any archaeological Heritage Assets will be confined to the construction phase. Excavations for foundations, service trenches, access routes, landscaping and the general movement of plant over exposed surfaces represent the highest potential for disturbance or loss of archaeological deposits. Long term attrition of the Site through gardening, tree planting and localised improvements to residential properties can have a medium adverse effect on any surviving archaeological remains on the Site.
- 2.56** To mitigate the potential adverse effects of the proposed development, further field evaluation by geophysical survey and trial trenching, taking the specific potential adverse effects of the proposed residential development into account, could confirm the archaeological potential of the Site and assess the truncation of deposits from historic land use. Further mitigation measures may be necessary to protect or record any archaeological deposits, replacing them with records, analysis and interpretation of equal or greater value than the data lost to the adverse effects of the proposed development.

Wildlife and Biodiversity

- 2.57** The site has been subject to a suite of survey work to assess its ecological value, including presence/absence and distribution of protected species. These include Phase 1 habitat survey, bat inspection and activity surveys, Badger survey, Great Crested Newt survey of nearby ponds, and breeding bird survey. The site is dominated by arable land of limited ecological value, although small areas of scrub, hedgerows and woodland are of relatively increased ecological value. The site provides some limited opportunities for roosting and foraging bats, foraging Badger, and breeding birds. The site is not subject to any ecological designations, although the Medway Estuary & Marshes Special Protection Area ('SPA') is located approximately 3.8km from the site.

Adverse effects on the SPA arising from increased recreational pressure will be avoided through a combination of accessible on-site green space, and financial contributions towards strategic-level mitigation.

- 2.58** The findings of the ecological surveys and analysis of potential impacts have been used to inform the emerging Masterplan, such that habitats of elevated ecological value are largely retained under the proposals, to avoid harm to biodiversity as far as possible. When harm is unavoidable, the Masterplan allows for sufficient mitigation and compensation to be provided, in addition to providing considerable scope for ecological enhancement.
- 2.59** These benefits will include the creation and restoration of priority habitats in accordance with **Policy CP28** and **Policy CP29** of the emerging Local Plan, and specific enhancements to benefit protected species. In addition, a network of green linkages and corridors can be provided across the site to deliver enhanced green infrastructure, in accordance with **Policy CP7** of the emerging Local Plan. Accordingly, the proposals are capable of full compliance with the ecological aspects of the NPPF, the adopted and emerging Local Plans, and relevant legislative requirements.

3.0 ALTERATIONS TO MUX1 SOUGHT BY THE REPRESENTORS

Alterations to MUX Policy Sought by this Objection

- 3.1** The Representor seeks the extension of the MUX1 allocation westwards to enable a new highway link to be made to Chestnut Street. In turn, this will increase the residential capacity of the site from a minimum of 565 dwellings to a minimum of 675 dwellings. The mix of uses identified in the text should include the provision of sports pitches, a clubhouse (also for Community Use), a neighbourhood retail facility, a medical centre and allotments.
- 3.2** Suggested wording is offered on the following page.

Representor' Proposed Amendments to Policy MUX 1

Land at southwest Sittingbourne

Planning permission will be granted for a minimum of **565 675** dwellings, commercial floorspace, and landscaping and open space on land at southwest Sittingbourne, as shown on the Proposals Map. Development shall take place in accordance with a Masterplan / development brief (developed through stakeholder consultation). These and submitted planning applications will demonstrate and encompass:

1. Accordance with Policy CP4, in particular, a strong landscape framework, achieving a net gain in biodiversity (to be shown by an integrated Landscape Strategy and a Landscape and Ecological Management Plan) and including:
 - a. provision of a substantial landscape and green space buffer, provided in advance of new development so as to ensure the mitigation of adverse visual impacts and the maintenance of a long term local countryside gap between Sittingbourne and Borden, in accordance with Policy DM25;
 - b. provision of green corridors and other green spaces within the development to: ensure an attractive living environment; assist in mitigating wider landscape and visual impacts; link with other existing open spaces; achieve a net gain in biodiversity; and meet open space needs in accordance with policy DM17.
2. A high quality design which responds appropriately to the local landscape character and distinctiveness of Sittingbourne and Borden as identified by the *Swale Landscape Character and Biodiversity Appraisal, 2011*;
3. Mitigation of visual impacts and implementation of public access to, and appropriate management of, the designated Local Green Space at the junction of Auckland Drive and Borden Lane;
4. Through both on and off site measures, ensure that any significant adverse impacts on European sites through recreational pressure shall be mitigated in accordance with Policies CP7 and DM28, including a financial contribution towards the Strategic Access Management and Monitoring Strategy;
5. Undertake a Heritage Assessment to determine heritage impacts and to propose mitigation as necessary. There should be no substantial harm to the setting of Cryalls Farmhouse;
6. Undertake an archaeological assessment and propose mitigation as necessary;
7. Provision of appropriate access to the site from Borden Lane ~~and~~ Wises Lane ~~and~~ Chestnut Street, with a transport assessment at the development brief and planning application stages to further consider:
 - a. the implications of a proposed road link between the Wises Lane (A2) ~~and~~ Borden Lane ~~and~~ Chestnut Street;
 - b. the phasing of development relative to, and financial contributions toward, improvements to the A249 at its ~~slip roads~~, junctions with the M2 and at Key Street;
 - c. transport improvements at the junctions of the A2, together with other residential streets and rural lanes, as may be determined;
 - d. whether effective and sensitively designed traffic management measures (inc. possible road closures) will be necessary in parts of Cryalls Lane, Wises Lane and Riddles Road so as to manage traffic levels on rural roads to the south and residential areas to the east, whilst maintaining and enhancing opportunities for walking and cycling.
8. Providing public transport, pedestrian and cycle links within the development and to the adjacent network;
9. A Health Impact Assessment in accordance with Policy CP5;
10. The retention and enhancement of any designated Rural Lane, in accordance with Policy DM26;
11. Provision of a mix of housing in accordance with Policy CP3, including provision for affordable housing in accordance with Policy DM8;
12. An assessment of potential noise and contamination and any mitigation necessary to address it; and
13. Provision of infrastructure needs arising from the development, including that identified by the Implementation and Delivery Schedule. This shall include provision by the developer of a two-form primary school (**capable of expansion to a 3-form entry school**), ~~and consideration of other local facilities~~ **a sports clubhouse open for community uses, a neighbourhood retail shop, a medical centre and allotments**, able to improve the services available to existing and future residents.