

## **Bearing Fruits 2031: The Swale Borough Local Plan Main Modification 142**

### **Representations by the promoters of development in North Iwade (SHLAA ref SW/120) Boathouse Properties (Iwade) Limited.**

#### **1. Summary:**

The Council's Main Modifications propose a new AX 5 Policy for the expansion of Iwade. We support the principle of development in this location.

However, we object to policy's 'blanket' approach of including North Iwade within the policy requirements for the bulk of the expansion area, which lies to the east of the village. This is unnecessary and risks serious delays to implementation and delivery.

#### **2. Access and services**

The majority (92%) of the development proposed in MM 142, lies to the east and northeast of the village. This land is within single ownership and control. Most of the remaining 8% of the allocation land to the north is within a different ownership and is promoted separately.

The residential development for North Iwade would be better served by achieving its principal vehicular and pedestrian access and all utility services provision from two points along Sanderling Way, rather than from Ferry Road. When the Sanderling Road development was completed in 2003, it anticipated the eventual incorporation of the objection land within the development of Iwade. Provision was therefore made for full vehicular access to the objection site to the north. This included appropriate vision splays, highway design and layout. The two access points are shown on the attached amendment to the Local Plan's Main Modifications Strategic diagram. In addition, appropriately sized drainage and utility services were provided within Sanderling Way and the surrounding development area.

Vehicular and pedestrian access from these positions would allow residents, visitors and service vehicles access to both Ferry Road and School Lane via the adopted estate road network. Moreover, pedestrians and cyclists would have more direct access to the school, village shopping centre and the sports and recreation areas, than via a new access off Ferry Road.

In any event, we consider that a primary access onto Ferry Road as indicated by the policy diagram, would result in considerable loss of habitat and natural vegetation, which forms an effective and established landscape screen to the built form of the village when viewed from the open marshland to the north and east. We suggest that any access at this point should be minor or secondary in function and character.

**We therefore seek an amendment to the Main Modification allocation AX 5 (Iwade), to indicate primary access as being from Sanderling Way**

**3. Landscape/amenity buffer, ecology, water management and development delivery.**

Up to half of the objection area (shown on the accompanying plan) will need to be set aside to provide a landscape buffer incorporating surface water management features and habitat creation for ecological mitigation and enhancement of bio-diversity. This area is indicated on the attached diagram as being in the northern portion of the objection land. In this way, the development will more than meet its infrastructure obligations for landscaping, ecological protection/enhancement and for the provision of amenity public open space.

We recognise the policy's objectives to ensure that substantial areas to the east of Iwade will remain undeveloped, with landscape buffers and for much of this area to be dedicated as a Country Park. However, there can be no benefit or justification for the North Iwade land being included as part of this comprehensive development area.

The preparation of comprehensive masterplans for the land to the east of Iwade will result in a much longer lead-time to preparing planning applications and securing approvals, than would be the case for a discrete development of the objection land to the north. The objection land to the north has already been the subject of survey and analysis in preparation for the submission of a planning application and could be validated and considered without the need for an Environmental Impact Analysis (EIA), which will certainly be the case for the land to the east.

The exclusion of the objection land from the overall policy requirements as suggested, would allow the expansion of Iwade to continue without undue delay and would provide a fast and useful contribution to meeting the 5-year housing supply deficit.

**We therefore seek an amendment to the policy wording in Main Modification allocation AX 5 (Iwade) to allow land to the north of Iwade (the objection land) to proceed in advance of the land to the east of Iwade.**