



Your ref: Matter 4
Our ref: JB/RB/1436

12 January 2017

Lynette Duncan
Programme Officer

Email: lynetteljdassoc@aol.com

Dear Lynette

RESUMED HEARINGS - SWALE BOROUGH LOCAL PLAN

MATTER 4 - OTHER NEW ALLOCATION POLICIES OR MODIFICATIONS

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 4 - Other New Allocation Policies or Modifications". The representations support the proposed allocation of residential development on our client's site which comprises of land at Preston Fields, Faversham.

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.

In support of these representations the submitted site masterplan for application 16/508602/OUT is appended which demonstrates that the site can accommodate up to 250 dwellings whilst also providing a significant amount of green space within the site. The developable area extends to 7.1ha of residential land which can deliver 250 dwellings at 35dph. The plan has been informed by the aforementioned suite of detailed technical reports.

COMMENTS IN RELATION TO MATTER 4 "ALL OTHER NEW SITE ALLOCATIONS":

Is each of the new AX allocations:

4.1 - Justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?

Policy NEW AX4 includes a concept plan for the site at Preston Fields, Faversham. This concept plan is the result of submissions by PFLT's, including a detailed Landscape and Visual Impact Assessment and assessment by the council.

The appended site masterplan and Landscape and Visual Impact Assessment, submitted with application 16/508602/OUT, details appropriate areas for development within the site whilst also demonstrating compliance with the council's concept plan for Preston Fields, Faversham.

The conclusions Swale Borough Councils Combined summary and Response Sheet to Soundness Issues (SBC/PS/117: Appendix 3 - SBC/CSR/3) considers there is no overriding reason why the allocation should not be proposed. The response states:

"In coming to this view, the Council has considered the findings of its Sustainability Appraisal (SBC/PS105b) and the need to maintain the relative positions of settlements with its settlement strategy (Policy ST3). Sittingbourne remains the settlement with the highest levels of new housing development (43.7%), followed by Faversham (17.2%), Minister and Halfway (14.7%) and Queenborough-Rushenden (12.3%)".

"In conclusion, the Council considers the allocation of the site to be sound because it is: (a) positively prepared because the Council is planning to meet its housing needs in a way that minimises impacts and maximises the opportunity for enhancements; (b) justified for those reasons set out above; (c) effective because it can deliver houses that can contribute to the land supply with limited environmental impact; and (d) consistent with national policy because the site is in an accessible location and is of lesser environmental harm than other alternatives, particularly relating to visual, landscape and SPA impacts. In particular, the mitigation of impacts ensures that the overall benefits of the development are considered greater than the remaining harm in accordance with the

Government's Presumption in Favour of Sustainable Development as set out in paragraph 14. Of the National Planning Policy Framework".

PFLT supports the assessment and conclusions detailed in the Swale Borough Council Combined Summary and Response Sheet (Soundness Issues) (SBC/PS/117: Appendix 3 - SBC/CSR/3).

4.2 - Deliverable within the Plan period?

Faversham is a very desirable location for people to live and housing delivery rates are very good. PFLT has confirmed that they intend to bring the site forward for development straightaway. An outline planning application has been submitted and validated and a detailed application is anticipated to be submitted later this year with a view to commencing works on site in 2017/18. PFLT consider that the Local Plan Milestones are realistic and achievable. There are no technical issues why this cannot be achieved.

The site will thus make a crucial contribution towards meeting the councils housing need and combatting the existing shortfalls in the borough.

4.3 - Supported by robust infrastructure planning? Have all the infrastructure implications been identified and addressed in appropriate detail?

The submitted outline application for the residential development of the site (up to 250 dwellings) is supported by a suite of robust technical documents which identify and assess the infrastructure implications of the site's residential development. The reports all conclude that the site can be developed for residential purposes without having any significant adverse impacts. Mitigation measures are identified where appropriate.

Policy NEW AX4 states that the development of the site will:

"Provide the infrastructure needs arising from the development, including those identified by the Local Plan Implementation and Delivery Schedule, particularly health and education provision".

The appended Masterplan for the site demonstrates that there will be a significant amount of open space and green infrastructure provided on site, as well as a community orchard and play area. Furthermore, the proposals involve creation of a footway/cycleway within the site with direct access to the A2, A251 and Salters Lane.

PFLT have confirmed that any reasonable requirements for financial contributions towards new and/or improved infrastructure will be fully considered and if necessary agreed with the Council during the determination of the application where reasonable to do so.

4.4 - Supported by clear and deliverable measures to address transport implications of the proposed development?

It is noted in the Council's response to transport issues (schedule of responses (SBC/PS/117)) that Policy NEW AX4 and Policy DM6 require a Transport Assessment and provision for pedestrian and cycle links within and to the adjacent network. The submitted outline planning application is supported by a Transport Assessment.

There has been regular correspondence between Bancroft Consulting (PFLT's appointed Transport Consultancy) and Kent County Council (KCC) and on 5 October 2016 KCC agreed the scope for the Transport Assessment.

It should be noted that pedestrian and cycle links are provided as part of the proposals for the site, as shown on the appended Masterplan which has been submitted with application 16/508602/OUT.

It is noted from the Council's response that the highway authorities have raised no objection to the allocation of the site which is welcomed by PFLT.

4.5 - Have the heritage, wildlife and biodiversity aspects of the site been taken into consideration?

The Council's response, (schedule of responses (SBC/PS/117)), concerning environmental issues concludes:

"...that there are insufficient sites of lower quality in locations that would be sustainable and/or suitable and as such the release of high quality land for development is both necessary and inevitable".

As noted above, PFLT has finalised a full suite of supporting documents which has formed the background and supporting information for planning application 16/508602/OUT. The reports demonstrate that the residential development of the site is acceptable and would not have significant or adverse impacts.

Ecology and biodiversity

The submitted planning application is supported by an Extended Phase 1 Habitat Survey which notes that the majority of the survey area comprises of arable field with areas of tall ruderal and scrub habitat around its boundaries. No legally protected or notable botanical species were noted within the survey area during the 2015 and 2016 surveys. As such there is no potential for impacts to such species. The masterplan for the proposed development is designed in such a way that the most valuable ecological resources will be retained within an interconnected network of green infrastructure.

Heritage

A Heritage and Archaeological desk-based Assessment has been prepared and has been submitted in support of the outline application for the site. The report states that the heritage assessment found that the site has low potential for remains from the prehistoric, Saxon/Medieval, Post-Medieval and Modern periods and moderate/low archaeological potential for the site to contain Roman remains. It notes that if any remains are present within the site, they are likely to be of no more than local significance. Therefore, archaeology is not considered to be a development/design constraint.

In terms of designated heritage assets, the proposals are not considered to impact upon the settings and significance of any Scheduled Monuments, Registered Parks and Gardens, and Registered Battlefields.

There is the theoretical potential for the development proposals to impact upon the settings and significance of the Grade II Listed Orchard Cottages and part of Faversham Town Centre Conservation Area, both of which lie to the north-west of the site. In response, sensitive landscaping and design, along with appropriate set-backs, would ensure that the settings and significance of Orchard Cottages and the Conservation Area are not impacted upon by the development proposals.

It is concluded that heritage, wildlife and biodiversity aspects of the site are all taken into consideration.

SUMMARY

In summary, PFLT strongly support the allocation of the site for residential development. Support is given to the Council's approach to the preparation of the Local Plan which is considered to be a fully documented and transparent analysis.

These representations confirm that the site can accommodate up to 250 dwellings. The land owners intend to bring the site to the market straight away which will assist in providing much-needed housing to meet the Council's housing shortages.

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

A handwritten signature in black ink that reads "J Berggren". The signature is written in a cursive style with a large, stylized initial "J".

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