



# Swale Borough Local Plan Examination

Day 3: Matter 4 – Other new allocation policies or modifications: New housing allocations AX1-AX7 Modifications to existing allocations Regeneration policies

Thursday 2 February

The Crown Estate (ref: 73427)

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## Matter 4 - New AX allocations

### Summary

1.1 The Crown Estate considers the proposed allocation of land at Belgrave Road, Minster (within its ownership) through Policy AX2 (modifications 147 and 148) to be sound. This is a highly sustainable location for new homes and there are no overriding constraints which would prevent the site from coming forward for development. The site can make a significant contribution to increasing the supply of housing to assist the Council in meeting its objectively assessed needs. In particular it is considered that allocation AX2 contributes to a sound plan as the allocation is:

- ▶ justified, the site presents the most appropriate site when compared against other reasonable alternatives as demonstrated by the Council's extensive evidence base;
- ▶ effective, the site is available now and is likely to be a location which attracts market interest; and
- ▶ consistent with national policy, the allocation of the site accords with the emphasis of NPPF to deliver sustainable development.

### Question 4.1 Is New AX2 Allocation justified by robust evidence, including landscape character assessment, sustainability appraisal and consideration of countryside gaps?

1.2 The Crown Estate considers the Council's strategy is based on a sound site selection process giving preference to well-located and accessible locations such as land at Belgrave Road, Minster. The allocation of land at Belgrave Road (Policy AX2) is 'justified' and presents the most appropriate site when compared against other reasonable alternatives. Land at Belgrave Road outperforms other options and has consistently been supported through the Council's extensive evidence base as being one of the most sustainable locations for new development. In summary:

- ▶ The SHLAA identifies that land at Belgrave Road (Ref: SW/165) has potential to deliver 140 new homes.
- ▶ The Draft Swale Core Strategy 'Bearing Fruits' and evidence base published in March 2012 identified The Crown Estate's land at Belgrave Road as being within an area of search for housing on the edge of Minster (Policy ST4).
- ▶ The Draft Local Plan 'Bearing Fruits' (August 2013) identified land at Belgrave Road as an allocation to provide a minimum of 140 dwellings. Policy A9 '*New Smaller Allocations as Extensions to Settlements*'.

- ▶ The ranked assessment of reasonable non-allocated site options (document reference SBC/PS/106 - June 2016) ranks the site as the 12th best non-allocated site from a potential list of 116 sites based on an assessment of sustainable development criteria.
- ▶ The SA Report Addendum (June 2016 – SBCPS/105b1) concludes at paragraph 5.3.14 that there are a number of standout sites that could be taken as a given for the purposes of developing alternatives, including site SW/165 (Belgrave Road, Halfway/Minster). This goes onto rank sites in West Sheppey in order of preference (page 81) with site SW/165 identified as most preferred. It notes the site is contained in the landscape and would represent a *'logical rounding off of Halfway'*.

- 1.3 The site can be developed without harm to the local landscape character. The Council's evidence base including the urban extensions landscape capacity study (reference CD/060d) concludes that the area to the south of Minster has capacity to accept development where the land is physically and visually contained to the north of Furze Hill (reiterated in paragraph 6.5.63 of the proposed modifications document). The Crown Estate's site at Belgrave Road is relatively flat and is contained by the higher land of Furze Hill (this point is reiterated in document SBC/PS039). The existing strong hedgerows that bound the site provide a strong landscape framework that can be augmented to form a new landscaped edge to the settlement. In the Council's summary of responses to this allocation (SBC/PS/117: Appendix 2 – SBC/CSR/2) they confirm in the overall reason for allocation that *"in the case of Belgrave Road, the Council acknowledges there will be some landscape and visual impacts. However, the topography and these site boundaries result in minimal landscape impact and visual harm over the wider landscape"*.
- 1.4 In allocating land at Belgrave Road through these proposed modifications the Council has rightly determined that the site does not play an important role to the countryside gaps designation. They confirm in document SBC/PS/117: Appendix 2 – SBC/CSR/2 that *"due to the site's smaller size and relative self-containment, there are no impacts upon the wider countryside gap between Minster, Halfway and Queenborough"*. Accordingly, the proposals map should be amended to reflect other modifications proposed to the Plan, and remove proposed allocations from the countryside gap designation to ensure there is no unintended inherent policy conflict or ambiguity. The Settlement Boundary should also be amended to include proposed allocation AX2.

#### Question 4.2 Is new AX2 Allocation deliverable within the Plan Period?

- 1.5 It is considered that this provides a highly developable location and is deliverable within the Plan Period. The site is not covered by any strategic constraints which would prevent it coming forward for development. The site is currently an arable field of limited ecological value and landscape quality, and with a high potential to accommodate development. The site provides a highly deliverable and developable site in line with guidance in the NPPF. In particular, the site is available now, it offers a suitable location for development and is achievable with a realistic prospect that housing will be delivered within five years. The site is deliverable because:
- ▶ It is not covered by any strategic constraints which would prevent development. Unlike many areas within the Borough, the site is not at risk of flooding and the area proposed for development is entirely located in Flood Zone 1 (lowest probability of flooding). As noted in the Sustainability Appraisal (examination document reference CD/003, paragraph 12.3.11) the site is of lower quality agricultural land. This is confirmed by the Sheppey Agricultural Land Maps (examination document reference SBC/PS/022c).

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<sup>1</sup> AECOM (June 2016) Sustainability Appraisal (SA) of the Swale Borough Local Plan (SA Addendum Report).



- ▶ It presents a logical and sustainable location for new housing provision. The site can deliver a quality development to assist in meeting the significant development needs in Swale. It also has the ability to deliver development on land free of any overriding constraints. The Council's SHLAA (examination document reference SBC/PS/003n) considers *"this to be an attractive location for new housing and would be likely to attract market interest by local or regional developers."*
- ▶ The Crown Estate is willing to bring the site forward and also has a track record of delivering land for development on Sheppey. The site can deliver a quality development to assist in meeting the Local Plan requirement, including a mix of dwellings to respond to local needs.

1.6 As noted above, the Council's SHLAA (SBC/PS/003n) considers this to be an attractive location for new housing. In addition, The Crown Estate has instructed Savills to undertake a viability assessment of the site. This has assessed the market value of the site based on comparable new build properties in the area and concludes that the site can be considered viable. The assessment agrees with the Council's estimate of the site delivering between 2019/20 and 2022/23 as stated in document reference SBC/PS/107 (phasing of local plan allocations).

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

1.7 The Council's modifications and inclusion of additional sites is supported by a robust assessment of infrastructure needs outlined in the Implementation and Delivery Schedule (SBC/PS/103). This identifies potential infrastructure requirements related to allocation AX2 including towards education, youth and health services. The Borough Council will seek financial contributions to improve facilities in Minster/Halfway as part of a legal agreement or community infrastructure levy towards improving this facilities and mitigating impacts of development. Any highways improvements will need to be proportionate to the impact that development at Belgrave Road has on the local highway network (see question 4.4 below).

#### Question 4.4 Is new AX 2 Allocation supported by clear and deliverable measures to address transport implications of the proposed development?

1.8 It is considered that the transport implications of the proposed allocation of land at Belgrave Road have been fully considered. The site offers a sustainable location for new development, a suitable access can be achieved to the site and the surrounding roads have capacity to accommodate this scale of development. Kent Highways Authority and Highways England have not objected to the proposed allocation as confirmed in document SBC/PS/117: Appendix 2 – SBC/CSR/2.

1.9 Access to the site will be taken via Belgrave Road. This is currently a 30mph 'No Through Road' that provides access to residential dwellings. Belgrave Road is of sufficient width from its junction with Queenborough Road to accommodate two vehicles passing. Furthermore, the publicly maintainable highway extends to the end of Belgrave Road and includes the footways and grass verges on either side of the carriageway. It is estimated that a development of 140 units would generate a modest number of peak hour car trips which can easily be accommodated on the surrounding road network. The Council confirms in document SBC/PS/117: Appendix 2 – SBC/CSR/2 that the proposed growth strategy is supported by robust transport modelling.

1.10 The site also has good access to the strategic road network. Queenborough Road links the B2007 and A249, to the west of the site, with the B2008 that runs through Minster-on-Sea. The B2007 provides access to Queenborough and the A249 links Sheerness with Maidstone. Heading south from Sheerness, access to Sittingbourne and the M2 and M20 motorways can also be achieved.

- 1.11 Through transport analysis undertaken by Amec Foster Wheeler, it is not considered that a secondary access is essential. Notwithstanding this position, the Highways Authority has identified a potential need and there is also a technical solution to provide a secondary (emergency/cycle/pedestrian) access on to Rosemary Avenue, if required, crossing a small part of the existing open space. Development could compensate for the small amount of open space lost through the creation of an emergency access achieved by enlarging the open space on land owned by The Crown Estate. The emergency access would also create greater permeability, thereby improving pedestrian and cycle access to facilities in Halfway/Minster.
- 1.12 The site is also well located to pedestrian and cycle routes meaning it offers significant potential to deliver sustainable development in Minster and reduce car dependency. It is within walking distance of the amenities and services in Minster and beyond. It is well located and connected by public transport. Queenborough Road has high frequency bus services with regular buses available to Queenborough, Sheerness, Sittingbourne and Faversham. Existing and proposed employment areas at Queenborough are also within easy walking and cycling distance of the site.
- 1.13 Given the site's proximity to employment opportunities and local community facilities and services, all of which are accessible by sustainable transport modes, it is considered that the site represents a highly sustainable option for housing. This view is shared by the ranked assessment of non-allocated options (SBC/PS/039) which concludes the site is relatively well located in terms of access to services and facilities.
- 1.14 The Sustainability Appraisal (CD/003, paragraph 12.3.7) describes the Western Sheppey Triangle (which Belgrave Road is located in the centre of) as being an accessible location because of the strategic road and rail network and availability of services and employment. This recognises that the western half of the Isle of Sheppey should be the focus for growth as it is well-connected and has access to both rail and bus services as well as the strategic road network (paragraph 4.3.70). Furthermore, paragraph 4.3.71 continues in identifying that the quality of bus services on the Island has, historically, had a strong bearing on how development has been distributed, with larger scales of growth focussed on the sustainable transport corridors, such as Queenborough Road.
- 1.15 Overall, the site offers significant potential to deliver sustainable development in Minster in line with the emphasis of NPPF. In preparing Local Plans, the NPPF (paragraph 30) states that '*...local planning authorities should...support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.*'

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

- 1.16 It is considered that the identification of the proposed allocations has fully considered other aspects including heritage and ecology. Amec Foster Wheeler has undertaken other technical work to confirm the site's deliverability. The Crown Estate also undertook a programme of ecology work throughout summer 2016 to assist in the early delivery of the site. The technical work responds to other requirements identified in proposed modification 147 as detailed below:
- 1.17 With regard to heritage, Amec Foster Wheeler has prepared an appraisal which provides a review of historic baseline data for the area surrounding Belgrave Road. This demonstrates that there are no issues to prevent the site being brought forward for development. A search of on-line sources of all historic environment data within a 500m radius of the site demonstrate there are no designated or non-designated historic environment assets currently known at the site. There is a limited potential that unknown archaeological remains of nominal significance could be encountered during development. This constitutes a risk to development, should remains be discovered during



construction works, but one that can be adequately addressed through a programme of archaeological investigation in advance of development and explored further at the planning application stage.

- 1.18 Amec Foster Wheeler has conducted an ecological desk study for the site to identify any biodiversity constraints and opportunities relating to potential housing in this location. This concludes that there are no habitats of sufficient value to prevent development coming forward. It also identifies no nearby statutory or non-statutory designated sites in close proximity to the site. In fact, development offers the potential to improve the habitat value of this agricultural site through the provision of new planting and SUDS features for example. As noted above, a programme of on-site ecology surveys were undertaken throughout summer 2016 to confirm the site's suitability. This has not identified any significant issues which would render land at Belgrave Road unsuitable for allocation.
- 1.19 The Crown Estate owns land to the south of the development site and could deliver the potential new footpath link to existing footpaths on Furze Hill. The enhanced recreational routes in the countryside immediately surrounding the site will assist in reducing recreational pressure on local SPAs.

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