

Lynette Duncan  
Programme Officer  
On behalf of Swale Borough Council

Our Ref: DHA/DB/4970

**By E-mail Only**  
[lynetteljdassoc@aol.com](mailto:lynetteljdassoc@aol.com)

4 January 2017

Dear Lynette,

**BEARING FRUITS 2031: THE SWALE BOROUGH LOCAL PLAN  
MAIN MODIFICATION RESUMED HEARINGS – ADDITIONAL ALLOCATIONS**

DHA Planning made a formal objection to the 'Bearing Fruits 2031: The Swale Borough Local Plan Part 1 Publication Version December 2014' on behalf of S W Attwood and Partners in January 2015. This representation concerned the omission of land west of Barton Hill Drive, Minster and additionally commented on housing supply and draft policy ST2.

Subsequent to this, DHA Planning submitted a hearing statement in response to Matter 4, Part 10 Housing Omission Sites, during the Examination process in November 2015. In summary our objection to the Local Plan and the omission of the above site were as follows:

- *The plan was not positively prepared because it did not seek to meet the housing OAN;*
- *The plan failed to take the opportunity to allocate a housing site that will also provide for one of the plan's key infrastructure requirements, plus overcome a serious practical problem with maintenance of Lower Road and a locally important issue about the road's capacity and condition;*
- *The plan was inconsistent with national policy, namely with NPPF para 157.*

We therefore argued that part of the remedy would be the re-allocation of land west of Barton Hill Drive subject to appropriate policy wording to specify the prior delivery of a new roundabout at Barton Hill Drive/Lower Road and wider improvements of Lower Road on land within our client's ownership.

The Local Plan Examination ended in December 2015 and the Inspector released Interim findings in February 2016. This concluded that the Plan was not 'sound' due to its inability to meet the identified objectively assessed housing need, concluding that the Plan should be based on an OAN of 13,192 dwellings between 2014 to 2031 which equates to 776 dwellings per annum, in comparison to the target of 10,800 (450pa) proposed.

**dha planning**

Eclipse House, Eclipse Park, Sittingbourne Road  
Maidstone, Kent ME14 3EN

t: 01622 776226 f: 01622 776227

e: [info@dhaplanning.co.uk](mailto:info@dhaplanning.co.uk) w: [www.dhaplanning.co.uk](http://www.dhaplanning.co.uk)

DHA Planning Ltd. Registered in England. Registration No, 2683 290



URS is a member of Registrar of Standards (Holdings) Ltd.



The Council in response to this issued a call for sites for main modifications to the Local Plan in order to allocate more sites.

Our client welcomes the agreement to increase the overall housing provision as part of the main modifications and to allocate land west of Barton Hill Drive with appropriate policy wording to specify the prior delivery of a new roundabout and road improvements at Barton Hill Drive/Lower Road (Main Modifications 145/146).

Without the inclusion of the site the plan would fail to allocate sufficient housing to meet their objectively assessed need both through the loss of some circa 620 houses but moreover would lose the only viable mechanism for the delivery of the land required for the A2500 Barton Hill Drive roundabout without which subsequent allocated development on the Isle Sheppey cannot come forward in highway terms.

The re-allocation of the Barton Hill Drive site will facilitate delivery of these road improvements and is sufficient to release the land with immediate effect to the highway authority for both projects and for the County Council LTP bid for the junction to be based on a probable delivery in 2017/18.

In the unlikely event that the LTP bid funding were to fail, monies collected to date could be pooled back to the landowner who would be willing to deliver the roundabout and road improvements privately as part of the redevelopment of land west of Barton Hill Drive. The projects are therefore fully deliverable.

In light of proposed main modifications 145/146 we wish to formally remove our client's objection to the Local Plan. We now consider the plan to be 'Sound' because, as modified, it meets the Authority's OAN provides for one of the plan's key infrastructure requirements and is subsequently now consistent with NPPF para 157.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Bedford', written in a cursive style.

David Bedford BA(Hons) PG DIP MA MRTPI  
*Associate (Planning)*

Direct E-mail: [David.Bedford@dhaplanning.co.uk](mailto:David.Bedford@dhaplanning.co.uk)