

10 January 2016

Sue Turner RIBA MRTPI
Swale Local Plan Inspector
c/o Local Plan Programme Officer,
Swale Borough Council,
Swale House, East Street,
Sittingbourne, ME10 3HT.

Our Ref: 16-034
Local Plan ID: 1016136

Dear Sir Madam

**Swale Borough Local Plan Part Examination in Public - January 2017
Land at Parsonage Chase, Minster- Site Reference SW/184 - Omission Site**

Respondent ID 101136: Mrs J Steadman

DAY 1 - 31 January 2017 – MATTER 2

We are acting on behalf of Mrs J Steadman (respondent ID 1016126) in connection with the above and we wish to express our gratitude for allowing us to comment and participate at the forthcoming hearing on 31 January. Our objection to the Main Modification version of the plan remains and we wish to add the following updates:

We put this site forward this site at Parsonage Chase as a site for a separate housing allocation and we subsequently provided further comments on 7 August 2016 in response to the Local Planning Authority's Main Modifications.

We have been directed us to explain which Modifications we wish to make comment upon at this stage in the process. We therefore direct the Inspector to Main Modifications in the document MM56 and MM58. We attach copies of our representations to date.

2.1 Does the modified Plan set out a strategy to deliver the area's development needs over the Plan period?

We remain concerned that the current strategy with a heavy reliance upon housing growth proposed in areas of on large site allocations. The Local Planning Authority has also previously referred to the difficulties it has in identifying deliverable sites to maintain a five year land supply. The tone suggest that the Local Planning Authority is not confident about its site allocations. The Local Planning Authority itself sets out and considers that there are major issues with the delivery of some sites because of infrastructure and viability issues and this suggests that the strategy is probably unsound. The Local Planning Authority should provide allocations in other areas which were not so dependent on large infrastructure decisions or which have large remediation costs

The Council cannot adopt an alternative approach to the five year housing land supply discipline as set out in the NPPF. Therefore, if sites are not deliverable or able to be implemented then the Local Planning Authority will need to identify others to maintain delivery of housing sites.

We therefore still consider it essential for a pool of small to medium sized sites to come forward as allocation sites in the Local Plan. It is noted that the Local Planning authority in its response (Comment ID 1306) agree on this specific point. The site at Parsonage Chase SW/184 is one such site.

2.2 Is the introduction of an indicative percentage split in MM40 justified and does it provide a clear and realistic guide for managing growth across the two planning areas?

No comment to add on this matter.

2.3 Do MM41/MM42 provide a clear and flexible approach to monitoring delivery across the borough as a whole?

No further comment to add.

2.4 Is the allocation of additional development sites in MM58 (Policy ST4) based on detailed and objective assessment of potential sites?

We have concerns that the site SW/184 has not been properly assessed and a certain number of presumptions have been made which we shall expand upon.

An additional call for sites was required due to a significant shortfall in housing allocation land to meet the established Objectively Assessed Need (OAN). We comment as others have as part of the Main Modification document that there has been an over emphasis placed on landscape matters. In relation to our site we are not within any designated landscape area. Furthermore, the assessments undertaken on the additional sites have not gone through extensive public consultation or the same scrutiny as other sites in the original document. They are substantial in number and the hearing represents the first opportunity for applicants to raise concerns over the findings. We ask the inspector to take this matter into account

Site SW/184 was put forward as part of the original call for sites with access off Parsonage Chase. To date, the site has been rejected due to impact on the adjoining Grade II listed building and for unspecified ecology reasons given by the local planning authority. The site is earmarked as part of larger parcel of land SW/194: *Land at Barton Hill Drive, Minster for 620 units with the retention and management of the former orchard which could also provide a pedestrian link through to Parsonage Chase (subject to third party agreement).*

To date, no discussions have been held between the local planning authority or the landowner about providing a pedestrian link or for the management of the orchard as part of the wider allocation. The landowners do not consider that this proposal as part of the wider allocation of land site reference AX1 or SW/194 to be acceptable and reject that a third party agreement can be entered into to provide pedestrian access across this land

The site contains apple trees that were previously used as an orchard although this use has long since discontinued. There is no evidence that any biodiversity or ecology survey has been carried out and the Council has put forward no expert evidence regarding the likelihood of species being present. Neither has any evidence been provided regarding the potential effect on any nearby site identified as being of nature conservation value.

Given that any necessary mitigation measures could be carried out following a suitable survey we consider that there is insufficient evidence that the proposal would harm biodiversity or ecology. As such reference in the main modifications to ecological enhancement works in AX 1 sub section c should also be removed.

The site is adjacent to Parsonage Chase a Grade II listed building. Alongside this designated heritage asset land can be set aside for screening development of this site. A landscape buffer strip can be provided along the eastern side of the site to address issues raised in connection with the setting of the listed building.

This site is deliverable without costly infrastructure and remediation works associated with larger site allocations on the edge of the Sittingbourne and the Isle of Sheppey. In the case of improving the 5-year supply, it is acknowledged by in the Inspectors initial findings that the availability of a pool of small to medium sized sites could have the merit in improving the supply without over inflating the total number of dwellings allocated. This is one such site.

Paragraphs 8.1.39 and 8.1.40 convey a lack of confidence in the drafted plan by the local planning authority. This does not reflect the positive planning principles set out in the NPPF. The local planning authority also refers to the difficulties it has in identifying deliverable sites to maintain a five year land supply. The Council appears to be setting out in plan itself arguments that may absolve it from any responsibility for the delivery of its plan.

We look forward to discussing these matters at the forthcoming hearing.

Yours faithfully

Andrew Street