

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: 16-007
Local Plan ID: 1016139

Dear Sir Madam

**Swale Borough Local Plan Part Examination in Public - January 2017
Land at Ellen's Place, High Street, Newington, Kent ME9 7JH**

Respondent ID 1016139 Esquire Developments Limited

DAY 1 31 January 2017 – MATTER 2

We are acting on behalf of Esquire Developments Limited (respondent ID 1016139) 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 Newington as part of the most recent Call for Sites undertaken by Swale Borough Council on 11 February 2016 and we subsequently provided further comments on 7 August 2016 in response to the Local Planning Authority's Main Modifications. The site has not been subject to scrutiny through the original draft Local Plan (Regulation 18 and 19) and therefore correspondence to date on this site is limited to representations made post February 2016.

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 eth 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 poor viability and 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.

As stated, the spatial strategy has a continued under supply of allocated sites in Rural Local Service Centres (RLSC's) such as Newington whilst there is an over emphasis on the expansion of large sites with costly infrastructure and remediation works on the edge of the urban areas. It is acknowledged by the Local Planning Authority in its response that sites in the RLSC's will give the Council the ability to support the 5-year supply with sites that will be attractive to the market. That comment is noted and welcomed. We agree and share the view of the Local Planning Authority that these sites are deliverable without costly infrastructure and remediation works associated with larger site allocations on the edge of the Sittingbourne and Faversham.

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 Local Planning Authority states that housing provision in the RLSC's has increased by 679 dwellings since the original submission plan, bringing the total to over 1,200 dwellings of the allocations in the plan as a whole. However, at Newington, the level of allocations has not increased in comparison with other Rural Service Centres in the Local Planning Authority's area (such as Teynham) which we will expand upon.

The Local Plan strategy that is endorsed by the Inspector steers the majority of growth to higher order centres to the urban centres and to the benefits of rural sites in the Rural Local Service Centres.

In summary, the Local Planning Authority should place more emphasis on Rural Local Service Centres playing a significant part in housing allocations within the Borough. The site at Ellen's Place is adjoining such a centre.

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 submitted the Ellens Place site in February 2016. We have concerns that the site has not been properly assessed. We have made reference that the site is previously developed land in commercial and equestrian use. The site itself is situated on the southern side of the High Street (A2) to the east of Newington. The site area is approximately 2.3 hectares. The capacity of the site based on a figure of 30 units density per hectare (dpha) which is appropriate figure for an edge of village location is approximately 65 dwellings. As part of that overall figure there will be an element of affordable housing provision made within the site.

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

Access to the site will be achieved off directly off High Street (A2) and represents a sustainable location adjoining an RLSC. At present, there is an existing access single track access leading to the industrial units on part of the site. The proposal will involve utilising the existing highway access onto the High Street to the east of the existing access as shown on the attached plans. Vision splays can be obtained in both directions. There is a pavement alongside the High Street that links this site to the centre of the village which is within walking distance.

The local planning authority has also stated that it has fairly poor physical connectivity and accessibility to the village. Once again this is not a correct. The site is within walking distance of Newington. Newington itself is well served by public transport links with bus routes 326, 327 and 355 operated by Arriva. There is a regular bus service between Medway Towns and Sittingbourne. The village has a range of facilities including a supermarket, post office, a café and restaurants plus community facilities. It is a designated RSLC.

Finally, development of this site will not consolidate ribbon development along the A2. To the east of the site there is less sporadic development separating Newington from urban Sittingbourne.

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

Yours faithfully

Andrew Street