



## **Gladman Developments Ltd**

### **Swale Borough Council Local Plan Examination**

#### **Matter 4: Other new allocation policies or modifications:**

- **New housing allocations AX1-AX7**
- **Modifications to existing allocations**
- **Regeneration policies**

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

- 1 The SA report published in June 2016 considers a range of scenarios for dealing with the identified additional housing needs. As we have noted in our response to Matters 1 and 3, Gladman do not consider that the Council's assessment of development opportunities for Swale is sound. This relates to the assessment of landscape impacts of development at South East Sittingbourne and a range of other factors. It is our belief therefore that there were fundamental issues with the Council's original assessment of sites, which then underpinned the SA. Nevertheless as we outline below we have delivery concerns regarding the development of sites on the Isle of Sheppey and in Iwade.
- 2 We do not consider that the SA or evidence outlines, or justifies the allocation of the sites. Furthermore, we consider that the evidence demonstrates that there are sites which should have been allocated in preference to the ones currently put forward by the Council.

#### **Question 4.2 Deliverable within the Plan period?**

- 3 Whilst Gladman note the content of SBC/PS/113 (November 2016 statement on 5 year housing land supply), having reviewed the PBA evidence on viability, it is not clear whether factors such as highways improvements have been considered by PBA in respect of the new AX allocations. The levels of funding associated with the needed infrastructure, as outlined in our response to question 4.3, must at least raise some questions about the deliverability of some of the allocations, particularly those in Minster on the Isle of Sheppey over the plan period. At present

it is considered that the deliverability of the allocations is not properly evidenced so as to be justified within the meaning of para 182 NPPF. Gladman would request that this position is clarified, given that development on the Isle of Sheppey would not be able to contribute to CIL (see e.g. CD/013a Local Plan Viability Testing – Addendum para 2.6.10). It is thought that the highways costs, which Iwade would have to contribute to, would be funded wholly through s.278/s.106 (approach roads to J5) and from s.278/s.106 and “potentially from external funding” (A249 corridor area). The costs at Minister would be funded through local growth fund bids and s. 106 agreements. This does not appear to be factored into PBA viability assessments, PBA appear to have assumed a notional s. 106 cost. Gladman have a concern therefore that the large infrastructure costs, some of which are from uncertain funding streams separate to the planning and delivery of sites, may mean sites are undeliverable.

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

- 4 A number of the sites in question are the subject of significant identified infrastructure costs. Many of the figures are “unconfirmed”, and therefore it is possible that the estimates contained within the Draft Infrastructure and Delivery Schedule 2016/17 are underestimations and do not include the full costs of infrastructure works needed to fully open up and develop some of the major strategic allocations. Gladman have expressed concern about the suitability and deliverability of a number of the additional allocations, we would highlight below the infrastructure costs identified for both AX1 – Land at Barton Hill Drive, Minster, AX2 Land at Belgrave Road, Halfway and AX5 Iwade.

AX1 and AX2

- 5 The Implementation and Delivery Plan requires the schemes to contribute towards a £6,000,000 improvement to the A2500. The first phase is costed at £1,600,000 in the document. However, this is subject to partial funding through the latest round of the Local Growth Fund. In a report to the Swale Transportation Board on the 19<sup>th</sup> December 2016<sup>1</sup> it was confirmed that the cost for phase 1 had now risen to £1,800,000 and that confirmation was still awaited that the South East LEP would allocate funding to the project as part of LGF3. Gladman requests an update on this position from the Council. It is noted that of the estimated cost of more than £6,000,000 (which is already subject to an increase) some £1,260,000 is to come from the LGF. The rest will presumably come through development contributions, since no alternative source of funding is mentioned in the IDS. Given that the Council themselves acknowledge in paragraph 86 of SBC/PS/113 that viability is poor on Sheppey (and indeed

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<sup>1</sup><http://services.swale.gov.uk/meetings/documents/s6694/A2500%20Lower%20Road%20Barton%20Hill%20Drive%20Roundabout%20Site%20Proposals.pdf> (Retrieved 4/1/17)

there is no scope for CIL or for any affordable housing contribution), a requirement to contribute substantial highways contributions has obvious implications for development viability, which does not appear to have been properly assessed. At the moment there is not a sufficient evidence base to conclude that the allocation of these sites will be effective, as required by para 182 NPPF.

AX5

- 6 The site is one of a number which is expected to contribute towards improvements in the A249 corridor, which are currently estimated to cost £37,500,000 (although it is noted that there are potential other improvements required at Bobbing, and the development would also be expected to contribute to improvements to the approach roads to Junction 5). The first £500,000 of the A249 corridor works, for the Key Street junction, is required by 2018 with the rest of the necessary works 'not likely' before 2023 according to the Implementation and Delivery Schedule. These timelines are now not far into the future, and the IDS tells us that the works are to be funded "potentially from external funding" as well as s.278/s.106 agreements from development. Given that the schemes do not feature in the Local Growth Fund 3 bid prepared by the LEP and are not part of the Highways England Delivery Plan for the period up to 2020, it is unclear what other external funding sources have been identified (if any) and therefore how much of this figure will need to be sought from planning applications. The range of possible contributions is extremely large, and completely uncertain at this point. It is recognised that para. 177 NPPF only requires a "reasonable prospect" that infrastructure will be deliverable within a timely fashion, but with the current level of uncertainty that threshold is not met. There must be significant risk to the delivery of this site, and others, if such a huge sum is potentially required to mitigate any highway issues.

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

- 7 As outlined above Gladman does not consider that the allocations AX1 and 2 and AX5 are supported by "clear and deliverable" highways infrastructure measures. In particular it is not clear what viability assessments have been undertaken and how significant elements of the work will be funded.