

CPRE Kent

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Swale Borough Local Plan - Matter 4: Housing

4.1 Objectively Assessed Need (OAN) (4.2.26)

(i) Does the Objectively Assessed Need relate to a Housing Market Area which is justified and which has been determined through strategic collaboration across administrative boundaries?

1. The Swale Borough Council response to ID4 indicates that the Council will undertake work to review Housing Market Area geography in accordance with the Planning Practice Guidance (March 2014).
2. CPRE Kent notes the main sources of information that were used in identifying the housing market areas in the 2009 SHMA:
 - House prices and rates of change in house prices, which reflect household demand and preferences for different sizes and types of housing in different locations;
 - Household migration and search patterns, reflecting preferences and the trade-offs made when choosing housing with different characteristics;
 - Contextual data, such as travel to work areas, which reflect the functional relationships between places where people work and live.
3. The three key sources of information applied to identify HMA's in the 2009 SHMA are consistent with those identified in Government's Planning Practice Guidance (PG) (March 2014).
4. Swale Borough Council published a new SHMA in September 2015. Having considered the 'testing' of the Swale HMA in this document, CPRE Kent is content with its conclusions. The pragmatic approach proposed seems reasonable and practical.

(ii) Has the Council participated further in the East Kent SHMA, as referred to in CD11 (DTC Statement)?

5. No comment

Matter 4

ID429231

Representation
Numbers:

LP234, LP240, LP281,
LP284, LP285, LP286,
LP287, LP288, LP289,
LP290, LP291, LP292,
LP294, LP295, LP296,
LP304, LP305, LP322.

(iii) Does the OAN, as set out in paragraph 4.2.26 of the plan, represent a true, objectively assessed figure based on up to date evidence?

(iv) Does the OAN take account of all relevant considerations, including:

- **Past under delivery;**
- **Market signals;**
- **The need for affordable housing;**
- **Employment trends, including cross boundary co-operation and is it underpinned by effective cross-boundary co-operation.**

6. The most up to date 2012 household projections (published in February 2015), not adjusted for second homes or vacancies, indicate a figure of 800 dwellings per annum, covering the period to 2031. The previous baseline figure available to the Council produced by KCC (ONS 2012 SNPP) narrowed the range of OAN in NLP forecasts to between 612 and 828 pa (Swale Development Targets Topic Paper 2014). These figures reduced this upper limit of this range to 800pa and at that time gave further confirmation of the continued robustness of the NLP work, commissioned by Swale Borough Council.

7. Planning Guidance suggests that the latest national projections should be seen as a starting point but that authorities may consider sensitivity testing projections in response to local circumstances and the latest demographic evidence.

8. Swale Borough Council considered these tests, and have updated the assessment in their Swale Development Targets Topic Paper December 2014 and again in September 2015 (SHMA 2015).

9. As stated in our representation **LP234**, CPRE Kent accepts the proposed target of 10,800 new dwellings over the Plan period. We endorse the reasoning presented by the Council as to why it is inappropriate in Swale to plan for the full objectively assessed housing need in both the Local Plan and its Topic Paper on Swale Development Targets published in December 2014.

10. A new SHMA, published in September 2015, using a re-based plan period of 2014 – 2031 concludes with a Full Objectively Assessed Housing Needs figure of 776 dpa. This is still within the previously forecast range for Objectively Assessed Need. CPRE Kent remains of the view that environmental and infrastructure constraints still restrain the ability of the authority to meet these needs. In the absence of further evidence, it remains appropriate and precautionary to conclude that it would not be sustainable to do so.

11. CPRE Kent notes the Council's position statement (SBC/PS/031), following the publication of the 2015 SHMA. CPRE Kent is very concerned about potential increases in development targets, and believes that there are overwhelming environmental and infrastructure constraints, as set out in the Council's December 2014 'Swale Development Targets' topic paper that mean that this is not deliverable. At this late stage in the process, and in the absence of adequate evidence of the assessment of impacts, including transport assessment, HRA and SA/SEA, no significant changes to the target should be proposed. We consider that the pragmatic approach is for an early review of the Plan to be undertaken to allow full engagement with residents and stakeholders rather than adjust the Plan now. In particular, time should be allowed to assess the impact of the proposed improvement to Junction 5 of the M2 and complete research to inform HRA and SEA.

4.2 Strategic Housing Land Availability Assessment (SHLAA)

12. No comment

4.3 Environmental and infrastructure constraints to delivering the full OAN (including 4.2.8 – 4.2.11 and 4.2.12)

(i) Has the impact of delivering the full OAN on the borough’s environmental designations, agricultural land and locally designated landscapes been rigorously tested?

The Swale SSSI, SPA, Ramsar.

13. CPRE Kent, in its comment on HRA, considers that the Council’s Habitat Regulations Assessment is soundly based. The delivery of 10,800 homes in the Swale Borough, was advanced as the Swale Borough contribution to housing growth across 5 local authority areas in the design of the Strategic Access, Management and Monitoring Strategy. As stated in the Habitats Regulations Assessment (and further highlighted in the Natural England comment on the Habitats Regulation Assessment) there will be a potential ‘carrying capacity’ for recreation in the North Kent Coast (Swale) SPA. At the end of para 5.4.2 of the Habitats Regulation Assessment (April 2015), it is stated that:

“Clearly, the lower housing scenarios across all North Kent authorities would maximise the likelihood that housing would actually be deliverable. With the higher scenarios there is an increasing risk that (with the mitigation strategy in place and being monitored) it emerges that housing levels are leading to unmanageable levels of public access and the authorities would have to start turning down planning applications.”

14. An additional housing requirement, beyond 10,800 homes, would result in it not being possible for the Council to be confident of no adverse effect on integrity of the SPA as a result of cumulative impacts of new development over a broad area. The delivery of sites would be at risk if levels of recreation on the protected habitats became unmanageable, and reached harmful levels.

15. The impact of development, beyond 10,800 homes cannot be considered as ‘rigorously tested’ and would need to rely entirely on an ongoing monitoring programme to identify if the carrying capacity of the habitat is reached.

16. Although the Council and the Inspector can conclude that any uncertainties about possible future in-combination effects were adequately dealt with by mitigation measures, it is necessary to first be satisfied about the safeguarding measures before any in-combination effects can arise. The scale of an increase in housing delivery from 10,800 to 14,800, must raise questions about the adequacy of mitigation proposed in the SAMMS (which was designed to a housing requirement in the Swale Borough of 10,800 homes).

17. It is the view of CPRE that an increase in housing development of this quantum would require further assessment to ensure that management and mitigation measures necessary to ensure ‘no likely significant effect’ are identified to the satisfaction of Natural England and the other competent authorities (Canterbury CC, Dartford BC, Gravesham BC, and Medway Council). To wait for deterioration to occur would not constitute adequate protection for the purposes of the Habitats Directive, and would risk delivery of housing elsewhere in North Kent.

18. The Swale BC HRA, published in October 2015 has re-considered this issue, as a result of a potential 're-base' of the plan period. Clearly the views of Natural England and the North Kent Environmental group of planning authorities will need to be sought on the conclusions of the HRA, to determine if they are satisfied that the existing SAMMS continues to be an appropriate and viable mechanism to deliver management of recreation pressure. **It is understood that the North Kent Planning Group have commissioned an additional study to consider the relevance of mitigation measures and potential changes to Council housing targets should be considered in this work. This is an essential and precautionary safeguard, which should take into account the cumulative impacts of changes to housing targets in all the affected LA's.**

Agricultural Land

19. CPRE notes the Council's additional information on agricultural land quality. The information gives confidence about the broad reliability of the agricultural land classification plans. CPRE Kent also welcome the Council's new publication 'Value of Best and Most Versatile Agricultural Land In Swale' which considers the significant economic contribution of BMV agricultural land. CPRE Kent believe that in the case of Swale, a managed approach to housing land is essential. Some restraint on the availability of greenfield sites will encourage development of brownfield land because there is likely to be a consequent impact on viability of doing so. Swale is one of the weakest property markets in Kent and release of substantial amounts of greenfield land will not serve to support urban regeneration ambitions.

20. CPRE Kent believe that the potential new housing requirement (SBC/PS/31 2015) would result in more losses of economically important agricultural land and reduce the viability of more sustainable sites. This would not amount to sustainable development.

AONB and locally designated landscapes

21. In addition to the designated Kent Downs Area of Outstanding Natural Beauty, there are also a number of locally designated landscapes. Some of these reflect the boundaries of the Special Landscape Areas that were originally designated by the Kent Structure Plan and all benefit from significant local support. The value of locally designated landscapes, but also the understanding of landscape character, are important material considerations in decision making. CPRE notes the 'sweep' approach included in the most recent SHLAA, seeking to identify suitability of sites if landscape/visual criteria are relaxed. By its very nature, rigorous testing of this approach necessitates rigorous consultation and consideration of local opinion.

(ii) Does this exercise demonstrate that environmental constraints prevent the full OAN from being delivered?

22. An untested housing requirement (significantly larger than the 10,800 houses target considered in the SAMM) would result in it not being possible for the Council to be confident of no adverse effect on integrity of the SPA as a result of cumulative impacts of new development. The delivery of sites would be at risk if levels of recreation on the protected habitats became unmanageable, and reached harmful levels. This would prevent the OAN being delivered.

23. In terms of the suggested 're-base' of the plan period, this concern must remain. CPRE Kent appreciates the Inspector's question, but would argue that the word 'prevent' when testing delivery of the OAN sets too high a bar. **Although a Council should seek to meet its Objectively Assessed**

Needs, environmental constraints may mean that it is not sustainable to do so. Sustainability is the key test and CPRE Kent argues that it is the accumulation of particular issues facing the Swale Borough, including environmental constraints that together cast severe doubt on delivery of the OAN.

(iii) If so, what level of growth can be delivered, taking account of these constraints in accordance with paragraph 47 of the NPPF.

24. As stated in our comment **LP234**, CPRE endorses the reasoning presented by the Council as to why it is inappropriate in the Swale Borough to plan for the full Objectively Assessed Need. The constraints on development in the Borough are significant. The Council develops its reasoning for these constraints in the 'Swale Development Targets Topic Paper' December 2014. The strategy to review the local plan once specified targets are met is essential to ensure sustainable development in this borough to the benefit of its population.

25. The Plan should be adopted now subject to commitment to review. This will allow housing delivery after the first 5 years of the plan to take account of emerging evidence on highway infrastructure and rigorous testing of the impacts of providing housing up to the Objectively Assessed Need. An updated transport study and additional work on ensuring there is no likely significant effect on SPA's and SAC's will be key.

26. With the exception of some site specific concerns, CPRE Kent supports the housing target proposed by the Council in the Publication Version of the plan, which supports a strategy that will assist in encouraging development and associated regeneration in the most sustainable locations.

(iv) Improvements to M2 Junction 5 – Does this, together the KCC confirmation that capacity exists within the local highway network to accommodate the higher level of housing growth, remove the issue of highway infrastructure as a constraint to delivering the full OAN across the Plan period.

27. It is, as yet, unclear what improvements are proposed to Junction 5 of the M2, and what impact these will have on the capacity issues at the junction. In the absence of further evidence, CPRE Kent does not believe that limited changes to the capacity of the junction will have a significant impact on the congested transport infrastructure at Sittingbourne. Congestion on the highway network is likely to still represent a constraint to delivering housing growth in the borough.

28. CPRE Kent would like the Inspector to note the following. The North Kent Woodlands SPA which abuts the A249 north of Maidstone already exceeds the critical load for Nitrogen Deposition. The exceedance of the identified critical load means, when applying the precautionary principle, that there may be an impact on the favourable¹ status of the SAC in the future. Traffic levels on the A249 are currently limited by junction capacity and this is likely to be the reason why the HRA has not considered changes in air pollutants in detail. This is probably due to an assumption that the traffic passing the SAC is unlikely to increase significantly under current housing targets.

¹ Last measured in 2008.

29. CPRE Kent suggests that significant increases in the levels of development in the borough, together with improved junction capacity, may begin to increase the levels of traffic at the SPA. Prediction is difficult because capacity issues at Junction 7 M20 also act as a constraint. Further increases in the housing target, together with increases in capacity on the A249 would need more detailed investigation to properly consider the scale of the air quality impacts that would be generated from the increase in traffic due to Local Plan allocations. The relationship between highway infrastructure and its action as a constraint to development, therefore will need to be considered in more detail, were housing targets to increase significantly beyond 10,800 homes.

30. A significant increase in traffic relates to an additional 1000 vehicle movements per day and a 1% increase in pollutants. To meet both of these thresholds would denote a likely significant effect. Therefore, additional capacity does not necessarily mean that there will be a potential for additional growth on the network, or that at least mitigation will need to be considered. Of course the cumulative impact of development, beyond the borough boundary will be important in this case.

4.4 Viability and Deliverability Constraints (4.2.17, 4.2.18, 4.2.26, - 4.2.34, ST2)

31. The viability evidence is soundly based and clearly illustrates the difference in viability across the borough and the impact this will have on the delivery of affordable housing. CPRE argues that realism is an important part of deliverability of housing, urban regeneration and the meeting other development aspirations across the west of the Borough, and in Sheppey and Sittingbourne in particular. CPRE understands the Council is updating its viability evidence and will comment on this in due course.

32. CPRE has set out its detailed response to this in its representation **LP234**. Demonstrating supply is not just about the numbers. Deliverability is key and sites must be available, suitable, achievable and viable. Although the viability assessment does not demonstrate that the OAN cannot be met, it does starkly and convincingly illustrate the differences in development viability across different parts of the borough.

33. A Local Plan strategy for the location of development must not simply be led by viability. It must be led by a development strategy informed by development needs, visioning, sustainability and consultation. The Council's development strategy at Policy ST3 identifies settlement tiers that guide the location of development, including Sittingbourne as the focus for growth, with development supporting regeneration. A 'plan led' approach should identify the best (most sustainable) suite of sites that are deliverable and make the most significant contribution to meeting this agreed development strategy. Some restraint on the availability of greenfield land will encourage development of brownfield land because there is likely to be a consequent impact on viability of doing so. Swale is one of the weakest property markets in Kent and release of substantial amounts of greenfield land will not serve to support urban regeneration ambitions.

34. The NPPF (*para.* 182) requires that for a plan to be considered "effective" it should be deliverable. Considering housing targets, deliverability has a two-fold meaning.

1. Individual sites, considered in isolation, must be deliverable on a case by case basis, and
2. all the sites identified in the plan must *in total* be deliverable.

35. It is vital, for a plan to be sound, that both of these facets of deliverability be addressed in the submissions before the EIP.

36. The NPPF was largely based on the belief that the housing supply was being restricted by the planning system, and so it states in *para. 173* that,

“... the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”

37. However, it is clear that deliverability of an overall target depends not only on the policy burden but also on the capacity of the building industry. The level of housing completions will, in simple terms, be given by the minimum of

1. the number of planning permissions granted and,
2. the capacity of the development industry.

38. Relaxing policy constraints, as was the aim of the NPPF, addresses the first of these points. This means that the important constraint on housing supply moves from the planning system to industry capacity. Delivering an individual site is, relatively speaking, easy. Delivering **all** sites in a plan is not simple. Presuming the building industry to be rational, it is clear that it will, in the past, have trimmed its capacity to the scale of sites that would likely be granted planning permission. Carrying readily usable excess capacity would be uneconomic. Thus, for a plan to be effective under *para. 182* of the NPPF it is incumbent on the development industry to demonstrate that it has, or will shortly have, the capacity to deliver **all** the sites proposed when policy constraints are lightened. However, expanding capacity, in the short-term at least, is highly problematic. There are a number of reasons for this:

1. The current relative high levels of economic growth and low levels of unemployment means that the labour pool is restricted.
2. The skill-base of the area, and the time required to increase skills are such that the labour pool cannot easily be increased.
3. The fact that higher targets are being considered in **all** the south-east planning authorities implies that capacity cannot be moved from other authorities' areas.

39. Swale understands this problem stating, in paragraph 4.2.18 of the Draft Local Plan that “[s]ince 1981, growth above 740 dwellings per annum has only been achieved in six years.” However, such a statement tends to give the impression that a target of 740 dpa would be “challenging” but possible. However, proper analysis of the data shows that the target is virtually impossible without significant increased industry capacity².

40. To give an idea of the scale of the problem it is relatively easy to calculate the probability of delivery of a particular target **on the assumption that nothing changes compared to the past**. Such an approach is a useful indicator of the scale of the problem but needs careful interpretation. If planning burdens are relaxed but industry capacity is not increased then, for the purposes of predicting house building, nothing has changed. The limiting factor remains industry capacity which has been set at the level of planning permissions granted in the past.

² Very crudely, six times since 1981 is roughly once every five years. If this means that, given the industry capacity, the probability of achieving more than 740 dpa is one-fifth or 0.2, the probability of *repeatedly* achieving it over 20 years is 0.2^{20} which is 0.00000000001048576%.

41. The probability of achieving a housing target of 540 dpa is only 36% over the 20 years to 2031. Given the low level of output in the three years of the plan period that have already past, the probability of achieving it over the period including the next five years (*i.e.* from 2011 to 2018) is even lower.

42. Targets in the range of 700 are, to all intents and purposes, totally unachievable.

Housing target (dpa)	Over 8 years (2011 – 2018)¹	Over 20 years (2011 – 2031)¹
540	19%	36%
740	0.007%	4 chances in a million
754	effectively zero	effectively zero

1. In both situations, the actual housing completions from 2011 to 2013 have been included. So the 8 year period contains three years when the completions are known and five when they are not.

Data used are KCC HIA housing completions for Swale.

43. Thus, given the evidence, CPRE supports Swale’s approach of setting targets that, in the short-term at least, are deliverable. In the absence of evidence of active steps being taken now by the building industry to increase capacity, setting higher targets is tantamount to imposing an undeliverable plan on the local authority.

44. An undeliverable housing target will result in the borough not meeting its 5 year supply, leaving the Council finding it difficult to resist housing proposals in less sustainable locations that do not accord with the development strategy for the borough. This is already happening with a number of speculative planning applications submitted.

45. The evidence provided on probability for delivery of housing targets means that a lower target will not suppress delivery and this is supported by HIA completions data. The 5 year annual average to 2013/14 was 432 units and the 10 year annual average to 2014/15 was 582 units. Under the Council’s proposed strategy of regeneration and rejuvenation to the west of the borough, the Council must make efforts to ensure delivery of its vision for the borough. Monitoring the success of the plan and delivery of housing and employment will ensure that development targets can be reviewed at the appropriate point.

46. Due to the risks associated with meeting the identified housing target, outlined in the CPRE representation, back loading the plan would not be helpful. The Council is trying to balance the development strategy and vision for the borough with deliverability of development. There is not an absolute match between these things and it would be difficult to resist planning applications for sites phased to later periods of the plan. Again this would risk delivery of the Council’s development strategy, which is led by regeneration and economic aspirations on the one hand, and steered by environmental constraints on the other.

4.6 Distribution and phasing of housing development (4.3.4 – 4.3.8, Table 4.33. ST3 – ST7)

47. Comment **LP281** identifies CPRE Kent support for the ‘Vision for Swale’. CPRE supports the Council’s reasons for recognising two distinct planning areas and the approach to seek delivery of a reduced scale of growth at Faversham. This is an essential distinction recognising the significant development constraints at Faversham and the surrounding rural area.

48. The Council, in its ‘Swale Development Targets’ Topic paper sets out the development constraints (high quality agricultural land, heritage, European wildlife habitats, landscape and settlement separation) in some detail. We endorse this analysis.

4.7 Windfall Allowance (4.3.32 – 4.3.34, ST4)

49. As set out in its representation **LP240** CPRE Kent consider that windfalls are a reliable and constant source of supply and we believe that the windfall allowance proposed is low and should be increased.

4.8 5 Year Housing Land Supply

50. No further comment.

4.9 Housing site allocations

4.9 (i) Housing site allocations: A7 Thistle Hill, Minster

51. See representation **LP304** – No further comment.

4.9 (i) Housing site allocations: A8 Stone Farm, Sittingbourne

52. This site is set within an area of moderate landscape sensitivity. It is located along the western edge of Sittingbourne, on land acting as a countryside gap, separating both Bapchild and the Tonge Conservation Area from the urban edge. The urban edge is not prominent in this landscape, due to existing screening from strong field boundaries. The Landscape Capacity Study (2010) makes the following statement:

“In order to retain the integrity of the separate settlement of Bapchild and to respect the rural valley setting of Tonge Conservation Area, it is not considered appropriate to extend the edge of Sittingbourne significantly between Snipeshill and the railway line. A very minor extension of the residential edge would perhaps be acceptable along this urban edge where existing strong hedgerow boundaries would prevent the extended urban edge from being visible from the valley which contains Tonge Conservation Area”

53. Loss of this visual separation between the urban edge, Bapchild and the Tonge Conservation Area would be unfortunate. CPRE Kent sets out in its representation (**LP284**) that this site was only considered suitable

for development in the Adopted Local Plan (2008) because the alignment of the northern relief road was proposed to follow a route north of the railway and to the east of Bapchild to join the A2. This meant that a gap could be retained and this was allocated as open space in the Adopted Plan.

54. There are three significant changes in the draft local plan.

- (i) Firstly the route of the Sittingbourne Northern Relief Road (SNRR) is no longer specified. Instead, an Area of Search is identified, which includes the land needed to act as separation between the town and the Tonge Conservation Area and Bapchild village.
- (ii) The draft plan does not allocate open space to the east of the development proposal. This area is now identified as part of an Important Local Countryside Gap, but is included within the site allocation. Policy A8 specifies the creation of open space to the east of the developed area and it is shown on the concept Map 6.5.1.
- (iii) The Area of Search for the Northern Relief Road includes the land intended as an Important Local Countryside Gap, and included as proposed open space in the concept plan for the allocation.

55. There is now a risk that the SNRR could follow a route to the east of proposed development at Stone Farm, on land currently identified as open space on the concept plans and which is essential as a countryside gap to maintain separation between Tonge Conservation Area and the village of Bapchild. This would be harmful and would compromise the objective of retaining an open countryside gap in this location, eroding the gap.

56. CPRE Kent have proposed that the least harmful location for the SNRR is on land immediately to the east of the current urban boundary. Therefore, the Area of Search for the SNRR should be extended across to the edge of the urban area. Selection of the route should not be limited by the allocation of the Stones Farm site for housing.

57. This potential erosion of the green gap between Sittingbourne and Bapchild and Tonge Conservation Area means that the validity of allocation at Stones Farm should be questioned. There does not now seem to be sufficient safeguards in place to maintain important countryside separation, critical to the setting of the Tonge Conservation Area and maintaining the separation of Bapchild village from the urban area.

58. As stated in the representation, the overriding position of CPRE is that the completion of the SNRR is not needed and all references to it should be removed.

59. In terms of accuracy of information, CPRE notes that a financial contribution towards wider initiatives across North Kent Marshes 'may' be required. CPRE understands this contribution is essential if Swale BC wish to demonstrate their plan is deliverable. This should be amended.

4.9 (i) Housing site allocations: Policy A9 Land at Crown Quay Lane

60. CPRE Kent comments in its representation **LP285** that this site should be allocated for mixed use development, for both office and housing. The position of the site next to the railway station means that the site is ideally located to make a contribution to delivery of office development. CPRE Kent believes that there is already a buffer built into the supply of housing land and this, together with potential alterations to density across the site, means this could be done without alteration to the Council's housing target.

61. Although it is not normally acceptable to rely on an SPD for delivery of sites in the local plan, CPRE Kent would argue that it is a sensible requirement in this case. The site is located in a particularly sensitive location. Habitat enhancements and provision of open space will be important, as will a response to impacts on any AQMA's and a sensitive approach to Creekside design and lighting. An SPD will allow a more detailed approach to site layout and design and involvement of local people on this important site.

62. In terms of accuracy of information, CPRE notes that a financial contribution towards wider initiatives across North Kent Marshes 'may' be required. CPRE understands this contribution is essential if Swale BC wish to demonstrate their plan is deliverable. This should be amended.

4.9 (i) Housing site allocations: A10 Milton Pipes, Sittingbourne

63. See representation **LP286**. This site is considered sound

4.9 (i) Housing site allocations: A11 Plover Road, Minster

64. See representation **LP305**. No further comment.

4.9 (i) Housing site allocations: A12 Land at Western Link, Faversham

65. Comment **LP287** sets out the CPRE representation on this site. Due to the location of the site within line of the Western Link, there is logic to the development of this site. Further opportunities should be sought, however, to promote a proportion of this site for employment use. It has good access to the A2/ M2. This would of course need to be informed by transport and air quality assessments.

66. In terms of accuracy of information, CPRE notes that a financial contribution towards wider management measures is a 'potential' requirement. CPRE understands this contribution is essential if Swale BC wish to demonstrate their plan is deliverable. This should be amended.

4.9 (i) Housing site allocations: A13 Allocation in existing settlements

67. CPRE comment **LP288** suggests that it would be clearer if Table 6.5.1 was referred to in the policy. It is noted that Bysingwood Primary School refers to Habitat regulation Assessment. The potential for HRA applies to all sites, not just this one. The reference should therefore be included in the general requirements, not just for this one site. The section of the policy should refer to DM28, not DM29.

4.9 (i) Housing site allocations: A14 Small allocations as extensions to settlements

68. CPRE Kent comment **LP289** refers to an error. HBC Engineering site is in Halfway, not in Minster. There has been planning approval for 142 dwellings on the site and the plan should also be updated in this regard.

Comment **LP289** also refers to the sites in Boughton and advocates simply setting a minimum housing target for Boughton, leaving the identification of sites to the neighbourhood plan. The plan is currently being prepared.

69. CPRE Kent objects to ‘**Land North of Key Street**’ Sittingbourne (**LP290**). CPRE Kent does not agree with the statement in the SHLAA that access to services appears to be the sole constraint to development. This site performs an important function as part of a countryside gap. The development of the site would be harmful, eroding the separation between Sittingbourne from Bobbing. Importantly, the site is valuable in providing visual screening between the existing urban edge and the A249 and this is perhaps its most important function as part of a countryside gap. The Landscape Capacity Study recognises its value, stating:

“The Strategic Housing Land Availability Site comprises woodland and scrub, including numerous mature trees. This land would be difficult to develop because it would be difficult to access and would entail the removal of a significant amount of vegetation which currently provides some visual screening function between the existing urban edge of Sittingbourne and the A249.

70. The site is isolated from the town, both physically and visually. Its value as a buffer to nearby woodland is significant and this would most appropriately be enhanced. This is suggested in the ‘Guidelines and Mitigation’ section of the Landscape Capacity Study (2010), which states: ‘conserve and enhance the woodland buffer between the existing urban edge and the A249’. The site has clear and increasing biodiversity value and protects the woodland to the north of the site from impacts associated with an urban edge.

4.9 (ii) Mixed Use Allocation: Policy MU1- Land at North West Sittingbourne

71. Representation **LP291** sets out the CPRE Kent comment on this site. Due to the location of the site within line of the A249, there is logic to the development of this site, indeed, the Landscape Capacity Study refers to the urban influence of the A249 in this location and its urban fringe character. There are, however, two issues that have been raised in some detail in the representation:

1. The gap between the development site and the settlements of Iwade and Howt Green is key to minimising the impact of this development on the setting and amenities enjoyed by the residents of these two settlements. The Council must have a firm resolve to ensure this happens. Part 2 of the policy usefully identifies the space as a continuous buffer and this is key to its success, both in terms of screening, but also to enable the space to provide a usefully long walking route. The policy could emphasise these requirements by dividing part 2 of the policy into two: landscape buffer to the western boundary in one, and the networked open space requirement in the other. The criteria identifies that this site offers mitigation of potential impacts on the SPA, but does omit to mention contributions to the SAMMs, which seeks to protect the North Kent Marshes from the impacts of recreation.
2. Grove Hurst Farm to the north of Swale Way should be deleted as an employment allocation. This land is an open and visible landscape, which forms an important separation function between the Sittingbourne and Iwade. The importance of this visible landscape is recognised in the Landscape Capacity Assessment (2010), which confirms it is not suitable for large commercial buildings and recommends in the section titled ‘guidelines and mitigation’ that a buffer of open landscape

between Sittingbourne and Iwade should be maintained. Proximity to the marshes to the north suggests that there may be habitat enhancement opportunities to extend wetland habitat in this location and this is supported by identified habitat network opportunities in the Landscape Character and Biodiversity Appraisal (2011).

4.9 (ii) Mixed Use Allocation: Policy MU2- Land at North East Sittingbourne

72. Comment **LP292** sets out the CPRE Kent representation on this site. Two issues have been raised in some detail in the representation.

1. The employment element of this development has been permitted. This is now an allocation for residential development and the policy should be recast to this effect.
2. However CPRE Kent objects to residential development in this location.

73. This proposal is poorly located and will extend the built confines of Sittingbourne in an illogical fashion. The site is not a sustainable location for development. Although East Hall Farm housing allocation may meet some of these needs, it remains poorly related to services and community facilities. The Agricultural Land classification Maps indicate that this land is of high quality (Grade 2/3a), it retains an agricultural use and the landscape has maintained an undeveloped character, particularly to the east of the site. The benefits of development in this location are limited – it is a ribbon development alongside the railway line, with a tenuous relationship to the urban area and its services.

4.9 (ii) Mixed Use Allocation: Policy MU3- Land at Frogal Lane, Teynam

74. No Comment.

4.9 (ii) Mixed Use Allocation: Policy MU4 – The Oare Gravel Workings, Oare Road

75. Comment **LP293**. This site is considered sound.

4.9 (ii) Mixed Use Allocation: Policy MU5 – Land at Lady Dane Farm, Faversham.

76. Comment **LP294, LP295 and LP296** set out the CPRE Kent objection to development at this location.

4.11 (ii) Housing type and mix and affordable housing.

77. Comment **LP322** sets out the CPRE Kent comment on affordable housing provision. This policy could be more effective in helping to deliver affordable housing.