

Report to : Bryan Sweetland, Cabinet Member for Environment, Highways & Waste

By: Director of Planning and Environment

Date: 31st May 2012

Subject: KCC's response to Swale Borough Council's consultation on their local plan Core Strategy, 2012.

Classification: Unrestricted

Summary:

This report updates progress with the Swale Core Strategy since KCC's comments on the options under consideration in January 2011. It recommends KCC's responses to the policies that are now the subject of public consultation (Part 6). In particular, it is recommended that KCC supports this "employment led" plan, the employment land provision, and the number of new dwellings proposed.

1 Introduction

1.1 The Core Strategy will replace the Swale Local Plan, and sets out the planning framework to guide development and investment in the Borough to 2031.

1.2 In January 2011, Swale Borough Council (SBC) consulted on an *Issues and Strategic Spatial Options* document which explored options for new homes, jobs and infrastructure, and where they should be located. SBC are now consulting on a Draft Core Strategy which sets out the preferred amount of development, allocates key sites, and identifies the infrastructure needed to support them.

1.3 Following this consultation a 'submission' Core Strategy will be prepared, and consultation on it will be limited to whether the strategy is 'effective, justified and consistent with national policy'. The document will then be submitted to the Secretary of State for a public Examination, and if found by the Inspector to be 'sound', it will be adopted by the Borough Council.

2 Relevant priority outcomes

2.1 The priority outcome for KCC is that the Borough Council should take full account of the implications for KCC service provision in their local plan. The Borough Council will consider the representations it receives and draft the Core Strategy to be considered at public Examination accordingly.

3 Financial Implications

3.1 The decisions to be taken by the Borough Council may have long term financial implications for KCC, depending on the mechanisms in place and the funding available in the future for infrastructure and service provision.

4 Legal Implications

4.1 Swale Borough Council is the responsible authority for the Local Development Framework and decisions on the scale and location of development. KCC provides information to the Borough Council as part of the evidence gathering that it must undertake to inform its decisions.

5 Background

The draft Core Strategy is the result of SBC's assessment of four options put forward in January 2011. These were:

Option 1. *Continuing the previous policy provision for housing, development concentrated at urban areas including 13,500 homes, 415,000 sq metres of business space, focus on Sittingbourne and Sheerness. Further expansion of Kent Science Park limited to the existing environmental and transport capacity.*

Option 2 : *Continuing previous policy provision for 13,550 dwellings , development concentrated at urban areas, but as an alternative to urban extensions additional greenfield housing (circa 3,250 dwellings) would be located at the larger villages.*

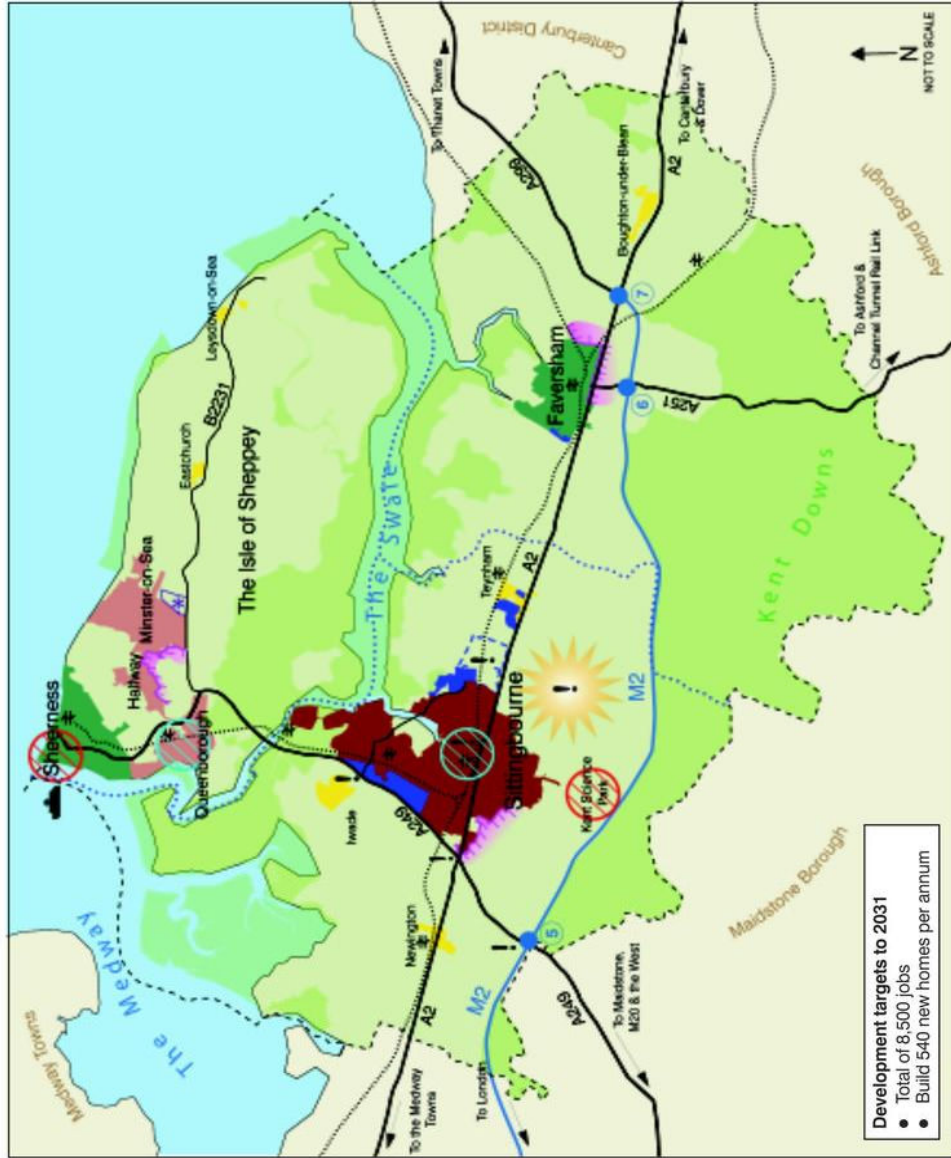
Option 3: *Step change in employment growth, continuing previous policy provision for 13,550 dwellings, development concentrated at urban areas. Housing growth and distribution as Option 1, but led by higher employment provision (595,000 sq m), more housing located on previously developed land e.g. within the Port of Sheerness. Major expansion of Kent Science Park and new junction to M2 (long term)*

Option 4 : *Step change in employment, with higher growth for housing (18,500 dwellings) and employment (595,000 sq m), plus other 'step change' employment provision at Kent Science Park and the Port of Sheerness as in Option 3.*

Elements of each of the four consultation options have been carried forward to a Preferred Options and the Spatial Strategy of this draft Core Strategy. The 'Key Diagram' for the strategy is reproduced overleaf.

Key Diagram: Swale Borough Draft Core Strategy

March 2012



Key

- Principal Natural Environmental Asset (DM5)
- Protection of wider countryside (DM5, DM6)
- Main Borough Centre (CP1 Primary growth focus)
- Other Borough Centres (CP1 Secondary, constrained, growth focus)
- Other urban centres (CP1 Other secondary growth focus)
- Local service centres (CP1 Main focus in rural area)
- Borough boundary
- Strategy area boundary (ST3-ST5)
- Proposed strategic allocation (SA1-SA4)
- Proposed strategic allocation area of search for Sittingbourne Northern Relief Road (SA5)
- Transport improvement
- Main regeneration opportunities
- Main future area of change (CP2, AC2, AC3)
- Areas of search for allocations (ST3-ST5)
- Future area of search for Sittingbourne Southern Relief Road (not geographically specific) (AC1)
- Reserve housing site (RSA1)

Isle of Sheppey

- Focus of growth on West Sheppey
- Delivery of major projects at Queenborough/Rushenden (employment/housing) and Port of Sheerness (employment)
- Future action to improve health of Sheerness town centres
- Area of search for 660 homes at Minster/Halfway
- Support for modernising tourism
- Protection of wildlife assets

Sittingbourne Area

- Principal town & focus of development in the borough.
- Establish town as location of choice for shops, jobs & services
- New mixed use sites in NW and NE Sittingbourne
- 1,000 homes & 110,300m² of employment floor-space in total
- Area of search for 130 homes in SW of the town
- Protection of countryside between Sittingbourne & villages

Development targets to 2031

- Total of 8,500 jobs
- Build 540 new homes per annum

The Rural Area

- 433 homes & 26,840m² of employment floor-space at Teynham
- Protection of wider countryside & natural assets
- Flexible planning policies to enable communities to meet local needs

Faversham Area

- "Conservation first" approach & employment priority at town
- 12,800m² & 135 enabling homes at Western Link
- Area of search for 20,000m² of employment & 150 enabling homes
- New Neighbourhood Plan for Faversham Creek

6 The County Council's Recommended Response to Consultation

(i) The Number of New Dwellings

6.1 Swale Borough Council (SBC) has set a housing target of 13,500 homes for the period 2006 to 2031. This number is expected to meet the future needs of the existing population and to ensure adequate local labour. Of this total, 8,550 dwellings have been built since 2006 or the land is already allocated. The Core Strategy therefore identifies new land for the remaining 4,950 dwellings.

6.2 The Core Strategy aims to improve the supply of affordable homes, but their delivery is expected to be difficult in the prevailing economic climate. It is flexible about how provision can be made, but contains an indicative target of 30-35% for the proportion of total housing that should be affordable on depending on the location of sites. An increase in number of larger family homes will also be needed, and some market housing in rural communities.

6.3 KCC previously favoured provision of 13,500 dwellings which would more than provide for the needs of the existing population. **It is therefore recommended** that KCC support SBC's preference for this target. This is a realistic number of new dwellings in the light of the market, the supply of affordable housing, the number of jobs, and the ability to provide infrastructure and services to support development. Growth on this scale should also avoid breaching the national and international environment and landscape designations that apply to parts of Swale.

(ii) The Location of New Dwellings

6.4 The Core Strategy seeks to identify new land for 4,950 dwellings. KCC previously favoured the location of new dwellings mainly at the urban areas, notably Sittingbourne and Sheerness/Queenborough. Policy ST2 below summarises the dwelling provision, and the majority of the new allocations and 'areas of search' are located at the urban areas - an exception is 433 dwellings at Teynham. **It is therefore recommended** that KCC support the proposed distribution of new dwellings:

Policy ST2 The Location of Development

Source	Housing	B Class Employment (m ²)	Retail/Leisure (m ²)
1. 'Saved' Local Plan Allocations	3,492	173,329	56,349
2. Sites in the SHLAA	912	n/a	n/a
3. Changes to built up area boundaries	121	n/a	n/a
4. Faversham Creek Neighbourhood Plan	102	To be determined	To be determined
5. Strategic allocations on the Proposal Map as follows:	1,718	169,940	0
a) NW Sittingbourne	880	69,100	0
b) NE Sittingbourne	120	41,200	0
c) Teynham	433	26,840	0
d) Faversham Western Link	135	12,800	0
e) Faversham 'area of search' to meet employment needs	150	20,000	0
6. Areas of search at the urban fringe shown on the Key Diagram, to provided in a Site Allocations DPD	790	0	0

a) South West Sittingbourne	130	0	0
b) South and West Minster/Halfway Isle of Sheppey	660	0	0
7. Windfall Allowance	1,450	Planning permissions granted in accordance with Spatial Strategy	
Total	8,585	343,269	56,349

6.5 In addition, three 'Areas of Change' have are identified which could trigger a full or partial review of the Core Strategy and an increase in dwelling numbers. They are:

- Sittingbourne Southern Relief Road connecting the A2 and M2 east of Sittingbourne;
- Major expansion of the Kent Science Park beyond the current highways capacity of the area;
- Land reclamation proposals for 2,000 houses at the Port of Sheerness

(iii) *Economy Development Targets*

6.6 In its previous response KCC preferred an option that would take advantage of the economic development opportunities in Swale and demonstrate a broad balance between employment and dwelling provision over time. Such a solution was thought not to require additional large scale business floorspace in addition to the expansion of both the Port of Sheerness and Kent Science Park.

6.7 The Core Strategy now preferred by SBC is 'employment led', providing generous amounts of employment land that will give flexibility to the market, and targets of 546,000m² floorspace and 8,500 jobs. Very few new land allocations are needed to achieve this, and there is further employment potential at the Port of Sheerness as a major hub for the manufacture of off shore wind turbines, providing 1,720 direct jobs. Growth in retail and leisure, particularly at Sittingbourne Town Centre and Queenborough, could provide 1,400 jobs.

6.8 **It is recommended that** KCC supports the 'employment led plan' for Swale, and its floorspace and job targets.

(iv) *Kent Science Park*

6.9 KCC in its previous response supported expansion of Kent Science Park if it provided high quality development for the science, technology and knowledge sectors, suitable access arrangements could be funded, and environmental impacts could be adequately mitigated.

6.10 SBC supports the principle of major expansion, but the means of delivering the infrastructure necessary to support this growth are felt to be too uncertain for this proposal to progress as a strategic land allocation at this time. The Core Strategy indicates the longer term potential, which would be brought forward through a Review of the Core Strategy when the right conditions or opportunities present themselves.

6.11 **It is recommended that** KCC supports this approach to further expansion of Kent Science Park, and works with SBC and the park operators to bring forward a partial Review of the Core Strategy, in parallel with an Area Action Plan for the Sittingbourne Southern Relief Road and linked development (Policy AC2).

(v) *The Port of Sheerness*

6.12 The Port has extensive opportunities for regeneration and diversification, and possible expansion, to take advantage of the deep water berths. A major opportunity is provided by the current planning application for the manufacture and assembly of wind turbines.

6.13 Policy AC3 states that SBC will support proposals for major regeneration at the Port of Sheerness subject to appropriate treatment of built and natural heritage assets. Subject to the scale and nature of proposals, this may require a supporting Development Plan Document or a partial review of the Core Strategy. **It is recommended** that KCC supports this policy approach to the Port of Sheerness.

(vi) *The main urban areas*

6.14 Sittingbourne is the main focus for development and concentration of public services and facilities, and Policy ST3 sets out how this will be achieved. The document identifies strategic sites for mixed use development in Sittingbourne, located to the north west and north east of the town and at Teynham. An 'area of search' needs to be identified for the Bapchild sections of the Sittingbourne Northern Relief Road.

6.15 The majority of development proposed on the Isle of Sheppey is to enable the economic regeneration of Sheerness Port and sites along the A249. There are other smaller opportunities for housing development at the edges of Minster and Halfway to complement the major new economic development.

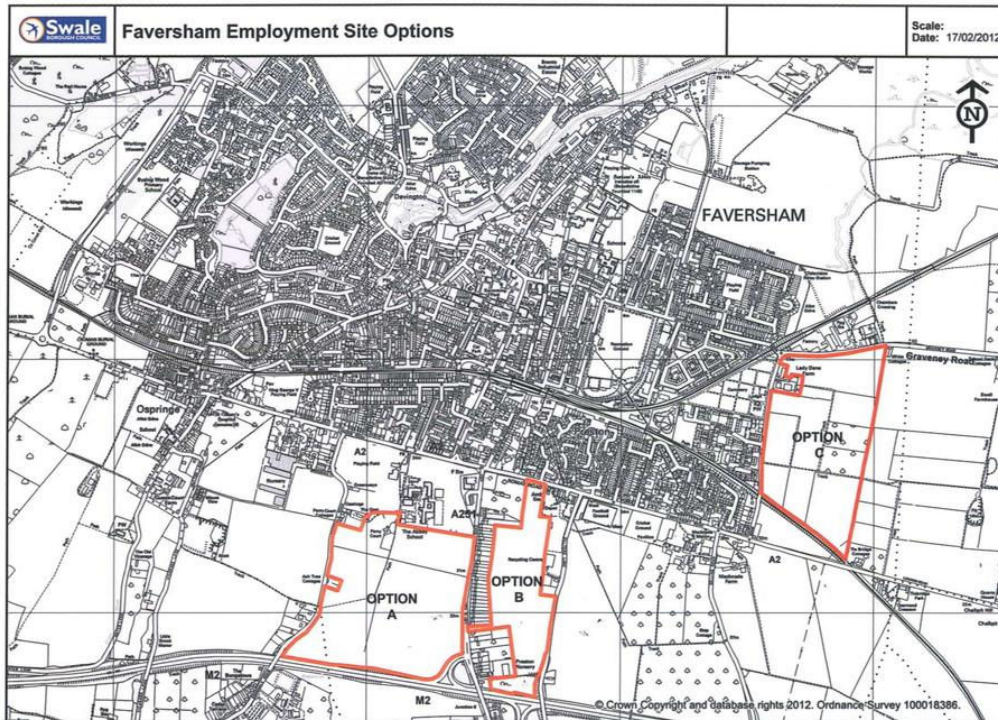
6.16 Following the completion of the second Swale crossing and the Rushenden Relief Road, there is a strategic opportunity for regeneration at Queenborough & Rushenden, primarily for housing and employment with associated social and community provision.

6.17 **It is recommended** that KCC support the approach to development of the main urban areas of Sittingbourne, the Isle of Sheppey and Queenborough & Rushenden.

(vii) *Faversham*

6.18 The Core Strategy proposes an emphasis on the conservation and enhancement of the historic and natural environment of Faversham. Growth at Faversham will be 'organic', with new development and services focused in the town, and policies to support its market town role and diversity of land use.

6.19 However, the range and quality of employment needs to be improved to meet local needs, and the draft Core Strategy consults on 3 sites to the south east and east of the town to meet this need:



6.20 The sites are:

- Option A: Land at Perry Court Farm, Brogdale Road
- Option B: Land between Ashford Road and Salters Lane
- Option C: Land at Lady Dane Farm, Love Lane

One of these will be allocated and enabling housing of up to 150 dwellings (5ha) is also likely to be pursued. Of these Option C is adjacent to a former industrial area and a housing estate, and would confine development to north of the A2.

6.21 **It is recommended** that KCC supports the policy emphasis for Faversham, and the allocation of a new employment site at Option C.

6.22 Faversham Town Council will prepare a Faversham Creek Neighbourhood Plan. This will set out a strategy for regenerating the creek including the allocation of sites and levels of development. It will make proposals for the restoration of historic buildings, improvements to access and the public realm.

(viii) Gypsy and Travellers

6.23 The Draft Core Strategy provides three options for the number of gypsy and traveller pitches which should be provided in the Borough:

- Option 1 is based upon the local capacity and availability of sites and requires 41 pitches of which 8 are new pitches;
- Option 2 is based on need and demand with household growth over 20 years and requires 79 new pitches
- Option 3 is based on local capacity and availability with forecast household growth over 20 years, and requires 41 new pitches.

6.24 The Gypsy and Traveller proposals were devised before the National Planning Policy Framework and the new Gypsy and Travellers sites national policy were published in March 2012. SBC is also considering whether to carry out a new Gypsy and Traveller Accommodation Assessment, and KCC would support this. **It is recommended** that KCC await the outcome of a new Accommodation Assessment, ask SBC to reflect the need for more socially-rented pitches in their final strategy, and offer them continuing support in meeting needs for well-managed, socially-rented sites.

(ix) KCC Infrastructure and Service Provision

6.25 Infrastructure requirements have been assessed in conjunction with KCC, and are addressed in Core Strategy policies and identified in the Infrastructure Delivery Schedule. Swale's infrastructure needs will be concentrated at Sittingbourne, Isle of Sheppey/Port of Sheerness and Faversham. The final schedule of new infrastructure requirements will not be finalised until the Core Strategy reaches submission stage when the spatial strategy and allocations have been confirmed, and the Infrastructure Delivery Schedule can be costed .

6.26 The strategic sites included in the *Core Strategy*, and other sites, should be confirmed as viable and deliverable before they are allocated. The *Infrastructure Delivery Plan* accompanying the *Core Strategy* should, as far as possible, set out the costs and timing of infrastructure, particularly to support strategic sites. Strategic development should not be proposed at this time, if the funding is not available or cannot reasonably be expected to emerge within the timeframe of the plan.

6.27 KCC support SBC's commitment to prepare a CIL Charging Schedule and KCC is willing to assist the Borough Council in its preparation and consideration of how infrastructure can be funded.

6.28 The *Core Strategy* must contain policies making clear that the cost of providing KCC services to support new development must be met by the developers, or other additional funds. Land for new schools etc. should be provided without cost to KCC, and identified in the Core Strategy and Site Allocations DPD. KCC will engage in early consultation on development proposals that have implications for services for which the County Council has statutory responsibility.

6.29 **It is therefore recommended** that KCC requests the Borough Council to include in policy, and to make clear in the CIL charging schedule that:

- KCC services to support new development must be funded by developer contributions, and that it will be necessary for the Borough Council to pass CIL revenue to KCC for schools, highways and other services.
- site(s) for schools and other services will be allocated in the appropriate Development Plan Document, and where they are located on development sites the developer should provide land, fit for development, at no cost to KCC.

It should also be recognised that KCC projects to support new development will change in the light of operational and other considerations

(x) Education

6.30 KCC has made an interim assessment of the need for new school capacity for the number of dwellings proposed by the Core Strategy, but this needs to be refined to take into account the location of dwellings now proposed. The interim assessment is as follows:

- Expansion of Lansdowne Primary School to 2FE
- 2 new 2FE primary schools within Sittingbourne urban area
- 1 new 1FE primary school on a 2FE site within Sittingbourne urban area
- Expansion of existing primary schools in Faversham for 139 additional pupils
- Expansion of existing primary schools in Teynham for 106 additional pupils
- Expansion of various rural primary schools to meet an 87 pupil demand
- 1 new 1FE primary school on a 2FE site at a location to be determined in the rural area
- 1 new 2FE primary school at Rushenden to meet demand from the area regeneration project
- 1 new 2FE primary school at Thistle Hill/Minster
- 1 new 1FE primary school on a 2FE site at a location to be determined (the model comprises a element of “Unknown” development applied across the district)
- 1 new 8FE secondary school plus 6th form on a 10 ha site at a location to be determined within the Sittingbourne urban area
- Expansion of Faversham secondary schools to accommodate 143 additional pupils
- Expansion of Isle of Sheppey Academy to accommodate 753 additional pupils

6.31 When SBC provide a revised housing trajectory KCC will be able to list and cost new school capacity more confidently. This should be included in the Infrastructure Delivery Plan and for used to prepare the Swale CIL Charging Schedule.

(xi) *Families & Social Care*

6.32 The Core Strategy takes into account the demographic profile of Swale, the areas of deprivation, and the necessary infrastructure to enable sustainable communities. It takes into account the ageing population, deprivation, and health that have direct impact on KCC’s services.

6.33 KCC welcomes SBC’s endeavour that all affordable housing should be designed to Lifetime Standards, and an agreed number to be designed for wheelchair use. Given the increasing number of older people, and the increase in people suffering from Dementia KCC strongly supports SBC in ensuring that Extra Care Housing and other Specialist Housing are developed across the Borough.

6.34 **It is recommended** that KCC invite the Borough Council to continue the dialogue on the implications for KCC services of development in the Borough, and to reflect the outcome in the *Infrastructure Delivery Plan* and CIL charging schedule.

(xii) *Transport - Sittingbourne Southern Relief Road*

6.35 New infrastructure will help support economic growth by providing additional highways capacity and measures to promote equality of access to transport through an integrated and sustainable transport network. A Local Transport Strategy is to be prepared in partnership with Kent County Council with measures to reduce car use and manage transport demand more sustainably. The final link of the Sittingbourne Northern Relief Road will be built, joining the A249 with the A2 east of Sittingbourne.

6.36 The Core Strategy recognises that longer term measures to relieve Junction 5 of the M2 and to improve the distribution of traffic into Sittingbourne need to be considered. This could be achieved by a Sittingbourne Southern Relief Road (SSRR), but there are no clear means of delivering this at the current time. The Borough Council will continue to promote the provision of the SSRR, and if the context for the delivery of the road become favourable an immediate partial review of the Core Strategy would be triggered. The Core

Strategy also recognises that KCC is committed to working in partnership with the Kent Science Park and Swale Borough Council to progress the SSRR.

6.37 KCC's Local Transport Plan (2011) focuses on improving the quality of local bus services through a quality bus partnership, which will complement the Sittingbourne Town Centre regeneration plans. The funding and prioritisation of transport schemes, particularly large projects, is likely to be influenced by a number of factors. These include Government's proposals for Local Transport Bodies to be responsible for local major transport scheme funding, the role of the South East Local Enterprise Partnership, and the operation of Community Infrastructure Levy and other emerging forms of funding.

6.38 **It is recommended** that KCC as Highway Authority supports the approach to Highways in the Core Strategy and continues to work closely with the Borough Council.

(xiii) Environment

6.39 The Core Strategy proposes that Swale's environment will be maintained and enhanced. New developments will make better use of resources and strategic allocations will explore the opportunities to provide renewable and decentralised energy. A coastal change management zone will ensure decisions taken now do not prejudice future measures that may be needed to mitigate climate change effects. The Core Strategy is supported by a Green Infrastructure Plan and developments will be encouraged to maintain and improve the network of green infrastructure, while maximising opportunities for biodiversity and access.

6.40 Policy DM1 Sustainable Design and Construction requires development proposals to include measures for water and energy efficiency, and to reduce carbon emissions and adapt to climate change.

6.41 **It is recommended** that KCC supports the approach taken by the Borough Council to energy, water, ecology and green infrastructure. However KCC requests that the Core Strategy should include:

- more specific policies for the protection of Internationally, Nationally and Locally Designated sites from the impact of development, and detail how much weight is given to each category.
- objectives to ensure that the developments do not result in a net loss of biodiversity, and aim to enhance and create areas of biodiversity interest.

(xiv) Heritage

6.42 Swale's heritage will be crucial to its regeneration, not just in Faversham but in all areas of the Borough. The variety of heritage assets in the Borough is among its most distinctive qualities. They will be crucial in its future prosperity and important elements in regeneration projects. Policy DM4 *Heritage Assets* will help ensure that Heritage remains at the centre of decision-making in the Borough

6.43 **It is recommended** that KCC welcomes the approach to Heritage and the cross-cutting objective which recognises that historic and natural assets can drive regeneration, tourism, and environmental quality. The recognition that the historic environment should also be used positively to create a 'sense of place' for Swale's new and exiting communities, and the strong emphasis on sustaining Faversham as an historic market town are welcomed.

6.44 Whereas most of its historic buildings have been identified, very many archaeological sites remain to be discovered. Where it proves impossible to retain the

whole of a heritage asset in the development process, it will be necessary to mitigate the loss as far as possible. This need for mitigation in the event of loss is not made clear in the document and yet it is a key aspect of the NPPF. **It is recommended** that the Core Strategy contains strong policies for the protection of the Borough's archaeological heritage and for archaeological recording and mitigation, and that the text be modified to make this requirement clear.

6.45 Swale possesses many hundreds of structures and archaeological sites along its coastline. Many of these sites are highly vulnerable, however, and could easily be damaged or destroyed by coastal works. The draft text at present understates the heritage interest of Swale's coastline, and KCC should be consulted on proposals that could have an impact on the coastal zone.

6.46 The heritage potential of Sittingbourne is often under-appreciated. The town contains a number of fine historic buildings, particularly along the A2, the ancient core around Milton Regis and Milton Creek both provide opportunities for heritage-led regeneration. **It is recommended**, that at if Sittingbourne, as the main growth area in Swale, the layout of any new housing and other development should take account of the historic landscape of the area, including existing patterns of roads, lanes, paths and field boundaries that can help to shape their layout.

(xv) *Minerals and Waste*

6.47 The Core Strategy needs to refer to KCC's emerging Kent Minerals and Waste Local Plan (KMWLP), to be adopted in September 2013. Six brickearth, recycling and clay mineral sites, and three waste sites in Swale are identified in the forthcoming 'Preferred Options' consultation documents

6.48 Minerals of economic importance should be safeguarded against development that would prevent the excavation of economic minerals. Some of the potential brickearth safeguarding areas in the KMWLP correspond to areas identified in the Draft Core Strategy. Where development is permitted within mineral safeguarded areas, early discussions should be undertaken with developers and the brick industry to extract as much of the resource as possible. In the case of brickearth these deposits are relatively thin so removal in advance of development should not prove insurmountable, nor prejudice the development itself. This would also delay the demand for developing other sites within the Borough that are currently valuable agricultural land. There may also be limited areas of chalk and sand and gravel that are safeguarded.

6.49 In addition wharves that import marine sand and gravel and crushed rock will continue to be safeguarded by the KMWLP at Ridham Dock and Sheerness, as required by National policy. Their locations and boundaries are identified in the MWDF Policy Directions consultation document (May 2011).

6.50 The Ridham/Kemsley industrial area is important for waste management. It has an existing composting plant and recycling plant, consent has been granted for a biomass energy plant and a large waste to energy plant with combined heat and power.

6.51 Norwood Quarry and Landfill on the Isle of Sheppey is the only hazardous waste site in Kent with planning permission and a waste permit to accept hazardous flue ash from the Allington waste to energy plant. The MWDF must reduce the waste sent to landfill and consequently the volume of ash from energy plants is likely to increase. Norwood is therefore an important site.

6.52 **It is therefore recommended** that the site allocations in the MWDF should be reflected in the Key Proposals Diagram in the Swale Core Strategy, and on site allocation maps. The mineral deposits that remain in Swale should also be safeguarded, including brickearth and sharp sand and gravel.

7 Recommendation

Recommendation:

The Cabinet Member for Environment Highways and Waste is asked to consider the proposed policies in the consultation on Swale's Core Strategy and to agree the proposed responses by KCC highlighted in Part 6 of this report. The formal response is to be submitted with a schedule of detailed comments.

Background Documents

1. Swale Borough Council Draft Core Strategy Bearing Fruits (March 2012)

Responsible Officers;

Paul Crick 01622 221527
paul.crick@kent.gov.uk

Tim Martin 01622 221618
tim.martin@kent.gov.uk

Planning and Environment
Kent County Council