

Agenda

Extraordinary Planning and Transportation Policy Working Group Meeting

Date: Thursday, 8 August 2024

Time 6.00 pm

Venue: Council Chamber, Swale House, East Street, Sittingbourne, ME10 3HT

Membership:

Councillors Mike Baldock, Monique Bonney, Charles Gibson, Kieran Golding, Alastair Gould, James Hunt, Elliott Jayes, Julien Speed, Karen Watson, Mike Whiting and Tony Winckless.

Quorum = 3

Pages

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2. Apologies for Absence

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Aside from disclosable interests, where a fair-minded and informed observer would think there was a real possibility that a Member might be biased or predetermined on an item, the Member should declare this and leave the room while that item is considered.

Members who are in any doubt about interests, bias or predetermination should contact the monitoring officer for advice prior to the meeting.

4. Election of Chair

To elect a Chair for this meeting.

5. Election of Vice-Chair

To elect a Vice-Chair for this meeting.

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|----|--|---------|
| 6. | Local Plan Review - Vision and Objectives and Growth Options - discussion | 5 - 14 |
| 7. | Local Plan Review - Housing historic delivery and Local Plan Review housing targets - discussion | 15 - 24 |
| 8. | Potential Local Plan Employment Sites - discussion | 25 - 36 |

Issued on Wednesday, 31 July 2024

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**Chief Executive, Swale Borough Council,
Swale House, East Street, Sittingbourne, Kent, ME10 3HT**

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Planning and Transportation Policy Working Group	
Meeting Date	8 August 2024
Report Title	Local Plan Review – Vision, Objectives and Growth Options
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
SMT Lead	Joanne Johnson, Head of Place
Lead Officer	Stuart Watson, Project Manager (Policy)
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. Members of PTPWG to recommend to Policy and Resources Committee the proposed vision and objectives for the Draft Plan Regulation 18 document; and 2. Members of PTPWG to recommend to Policy and Resources Committee a growth strategy for the Draft Plan Regulation 18 consultation.

1. Introduction

- 1.1 As part of preparing the draft Plan Regulation 18 document it is essential for members to agree both the vision and objectives of the Plan and to provide a steer toward the Plan’s growth strategy.
- 1.2 The vision and objectives of the Local Plan Review set out what the Plan’s priorities are and what is to be achieved. The vision and objectives were last reviewed as part of the Regulation 18 issues and preferred options consultation in October 2021.
- 1.3 This paper will discuss two main issues:
 - the Local Plan Review’s vision and objectives, and;
 - the previously used Local Plan Review growth options and alternatives.

2. Vision and objectives

- 2.1 The National Planning Policy Framework (NPPF) 2023 sets out the approach to Plan Making at Chapter 3, and paragraph 15 states that “... *Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings*”. Whilst the vision states what a Local Authority intends the Plan to

deliver at headline level, a series of underlying objectives set out the specific aims of the Plan which will enable that vision to be realised. As part of preparing the Draft Plan Regulation 18 consultation it is important to confirm what members agree is the vision for the Plan and the objectives to reach that vision.

- 2.2 The latest version of the vision and objectives of the Local Plan Review were consulted upon as part of the Issues and Preferred Options consultation (Regulation 18) in October 2021 and are set out below at figures 1 and 3. A report that summarised responses to the consultation was taken to the Local Plan Panel on 24th March 2022. The summarised consultation responses for the vision and objectives are contained in Appendix 1 and 2 below.
- 2.3 When reviewing the draft vision in the Regulation 18 consultation from 2021 the responses on the whole were supportive. There are a number of suggested changes which are addressed in the Regulation 18 objectives and are more detailed than appropriate for a vision. However, the Kent Downs AONB unit suggested the strengthening of focus on the natural environment to include “conserve” as well as “enhancement”. This position would align with the NPPF 2023 paragraph 185 that is concerned with habitats and biodiversity and uses the phrase protect and enhance. Natural England also suggested strengthening the vision’s focus towards climate change mitigation. Whilst the vision contains statements on low/zero carbon and renewable energies, climate change is not specifically referenced.
- 2.4 A revised draft of the vision that incorporates these amendments, corrects a number of grammatical issues to sharpen the focus of the vision and reflects the language and ambitions of the Corporate Plan is provided for members’ consideration at Figure 2 below. At this stage the revised vision is a working draft and will benefit from further revisions once the strategic policies of the Local Plan Review have been updated and agreed with members.
- 2.5 The draft objectives in the Regulation 18 consultation from 2021 again received support in the responses. However there was some concern over objective 4 needing further clarification towards creating sustainable lifestyles, as set out in the requirements of the NPPF 2023 and in doing so defining what a transport hub should be. Responses also focused on the requirements to conserve and enhance the natural and built environments and the objectives would benefit from this approach.
- 2.6 Members are asked to consider and make any comments on the revised draft vision below and whether objective 1 should have a stronger focus on conserving and enhancing the natural and built environment and that objective 4 should set out a definition of a transport hub. As above, the objectives should be considered

a working draft, which will benefit from further revisions once the strategic policies of the Local Plan Review have been updated and agreed.

Figure 1: Draft Vision Regulation 18 consultation October 2021

Draft Vision

Generally, new development will have come forward to meet local needs and contributed to supporting low/zero carbon and renewable energy initiatives, enhanced the natural environment through biodiversity net gain, ensured quality design and place making which has capitalised on the borough's extensive natural heritage assets in a way that supports the health and wellbeing of our communities.

At Sittingbourne, a re-focussed town centre aimed at securing a vital and viable retail heart supported by leisure and dining opportunities, whilst enabling new high density residential and community activity and recognising its heritage assets. This has been achieved by wider regeneration, public realm improvements, and reconfigured and improved sustainable and active transport connections at and around the town.

At Faversham, a thriving market town and heritage destination that has successfully managed 21st century demands. It has been achieved by enabling sympathetic and symbiotic growth whilst reducing congestion and air quality issues along the A2 over the period to 2038 and beyond.

At Sheerness, Minster and Queenborough, the promotion of coastal and port rejuvenation making most use of its heritage assets whilst supporting the needs of the local communities.

At our rural and maritime communities, enable development to maintain and improve local services to cater for the local daily needs of its residents and to support vibrant and healthy communities whilst maintaining the quality of the local countryside environments in which they are set and protecting their heritage.

Figure 2: Revised Vision for the draft Plan Regulation 18 consultation Autumn 2024

Revised Draft Vision

It is 2040. Development in Swale has come forward to meet local needs. It has supported climate and ecological imperatives and has conserved and enhanced the natural environment through significant biodiversity gain. Renewable energy initiatives have been high on Swale's agenda. Quality design and place-making has capitalised on the borough's extensive ecological and heritage assets and has supported the health and wellbeing of our communities.

Sittingbourne has a refocused town centre with a vital and viable retail heart supported by leisure and recreation opportunities, and enabled by new high density residential and community activity which has recognised and respected the area's outstanding heritage. Development has secured wider regeneration benefits, including improved public realm, and reconfigured and enhanced sustainable and active transport connections – both in and around the town.

Faversham is a thriving market town and nationally-known heritage destination that has successfully balanced 21st century demands with respect for the past. This has been achieved by sympathetic and symbiotic growth.

At Sheerness, Minster and Queenborough, coastal and port rejuvenation has maximised the impact of our natural and built assets and supported the needs of the local communities.

Our rural and maritime communities have seen enabling development maintain and improve local services. The local needs of residents are well catered for, supporting vibrant communities whilst maintaining the quality and special qualities of the countryside setting.

Across the borough development has improved health and air quality, and increased opportunities for local employment, active travel and affordable housing. Development has supported a vibrant sense of community, within and across the Borough. There are thriving built and outdoor sports and leisure facilities, and everyone has access to a decent home. Swale is a place residents, businesses and visitors recognise as sustainable and forward-looking – a place to live, work and enjoy.

Figure 3. Draft Objectives Regulation 18 consultation October 2021

Draft Objectives

1. To provide for homes and jobs that are best suited to meet identified local needs;
2. To support and sustain communities across the borough, big and small, by planning to meet identified needs, including needs for community facilities and infrastructure;
3. To protect and manage our resources to address climate change through delivering sustainable growth that supports urban and rural economies and makes the best use of infrastructure;
4. To locate development in the least constrained parts of the borough in reasonable proximity to transport hubs;
5. To provide a range of housing developments across the Borough that deliver a range of housing sizes and types to meet the needs of young people, families and older people;
6. To deliver a level of investment and growth at key locations to facilitate significant improvements to support infrastructure e.g. schools, healthcare and highways and sustainable and active travel options for the benefit of local communities; and
7. To focus development on the contribution that larger sites can deliver in a proportionate way to meet wider plan objectives and ensure delivery during the plan period and beyond.

3. Growth Options

- 3.1 The growth options considered for the Regulation 19 consultation in April 2021 are set out in table 1 below. Officers have also produced an alternative set of growth options from those previously used (table 2) that members can also consider should they feel an alternative approach to those previously presented is preferable. Members are free to choose from both sets of options or to provide an alternative that has not been considered. The Regulation 19 growth options gave percentages of development however in reality some flexibility is required on the levels of development by approach once allocations have been chosen and the capacities known.

- 3.2 A growth strategy sets out the approach to where development is to be delivered and then the evidence base including the HELAA, flood risk, transport and the Plan’s sustainability appraisal amongst other matters determine what sites and their capacities can be delivered against the strategy.
- 3.3 It is critical now for members to provide a steer towards a growth strategy for the Local Plan Review so that potential allocations from the findings of the HELAA and the Employment Land Review can be chosen, site policies written and key evidence as set out above allowed to progress. Any further delay would require an adjustment to the Local Plan Review timetable.

Table 1. Previously discussed LPR growth options

Option	Description of growth option	Additional development (30% windfall allowance) July 2020	Additional development (26% windfall allowance) 2024 update
A	Business as usual: development focused on extensions to main settlements with a focus on the Thames Gateway area	* Sheppey - 17.5% * Sittingbourne – 30.5% * Faversham – 12.5% * Rural areas – 8.5%	* Sheppey - 18.75% * Sittingbourne – 31.75% * Faversham – 13.75% * Rural areas – 9.75%
B	More even distribution of the additional Local Plan Review requirement across the borough’s main urban centres and rural areas	* Sheppey - 14% * Sittingbourne – 21% * Faversham – 24.5% * Rural areas – 10.5%	* Sheppey - 15% * Sittingbourne – 22% * Faversham – 25.5% * Rural areas – 11.5%
C	More even distribution of the final requirements (Bearing Fruits and Local Plan Review) across the main urban centres	*Sheppey – 14% *Sittingbourne – 10.5% *Faversham – 35% *Rural areas – 10.5%	*Sheppey – 15% *Sittingbourne – 11.5% *Faversham – 36% *Rural areas – 11.5%
D	More of the overall local plan requirement at the eastern end of the borough	* Sheppey – 7% * Sittingbourne - 7% * Faversham - 45.5% * Rural areas 10.5%	* Sheppey – 8% * Sittingbourne - 8% * Faversham - 46.5% * Rural areas 11.5%
E	Focus on Strategic Development Sites (New Garden Communities) primarily located within existing rural areas	* Sheppey – 3% * Sittingbourne – 5.5% * Faversham - 5.5% * Rural areas – 56%	* Sheppey – 4% * Sittingbourne – 6.5% * Faversham - 6.5% * Rural areas – 57%

Table 2. Alternative growth options

Option	Name	Description
1	Continue Local Plan Bearing Fruits approach	This is the same approach as option A above. Majority of development focused on Sittingbourne with moderate levels of development at Faversham and Queensborough and Rushenden.
2	Strategic site in west of Borough/settlement hierarchy hybrid	A new option. 1 strategic site carrying good proportion of development need, however there will still be considerable amounts of development to be provided in other locations
3	Strategic site in east of Borough/settlement hierarchy hybrid	Similar to option C above, however more specific approach to delivery. 1 strategic site carrying good proportion of development need, however there will still be considerable amounts of development to be provided in other locations.
4	Strategic sites in east and west of Borough/settlement hierarchy hybrid	A new option. 2 strategic sites, dispersed evenly in the Borough greatly reducing the onus on other settlements to accommodate remaining development.
5	Strategic scale new settlement/settlement hierarchy hybrid	This is the same approach as option E above however sets out how remaining balance of need would be delivered. Much of the development need focused on one area, however development of this scale is likely to be delivered late in the proposed Plan period and beyond placing strong onus on other settlements to accommodate development need in the shorter term.
6	Very large strategic site in east of Borough/settlement hierarchy hybrid	This is the same approach as option D above. A site large enough to provide the dwellings and space for a new secondary school. Would significantly reduce onus on other settlements to accommodate need.

4. Proposals

- 4.2 Members of Planning and Transportation Policy Working Group are asked to recommend to Policy and Resources Committee the vision and objectives as set out in this report and a preferred growth strategy for the Regulation 18 draft Plan consultation.

5 Alternative Options Considered and Rejected

- 5.1 The full list of Growth Options used in the Council's previous Regulation 19 consultation in 2021 have been presented in this report as well as an alternative selection of options. The growth options presented are those considered most reasonable based on the Borough's geography and the requirements of sustainability as set out in the National Planning Policy Framework.

6 Consultation Undertaken and Proposed

- 6.1 The review of the vision and objectives and growth strategy options have been developed through informal discussions with members of this work group. The Local Plan Review draft Plan Regulation 18 that will go out for statutory consultation later this year will provide formal consultation on these matters.

7 Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the economic objective of the Corporate Plan – To progress a Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	The recommendations of this report will have no specific budgetary implications.
Legal, Statutory and Procurement	Preparation of a Local Plan is carried out under a national legislative and regulatory framework.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	The Local Plan will be supported by its own Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making.
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this stage.

Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

8.0 Background papers

- 8.1 Local Plan Panel report 24th March 2022
<https://ws.swale.gov.uk/meetings/ieListDocuments.aspx?CId=216&MId=3513>

9.0 Appendices

Appendix 1. Summary of response to Vision Statement Regulation 18 Consultation October 2021

Vision and Objectives
<p><i>Q4 – Do you agree this is the right Vision for the borough? If not, please explain what changes you would like to see made to the Vision and why.</i></p> <p>The main elements for greater emphasis/consideration in the vision are:</p> <ul style="list-style-type: none"> • Combating air quality issues from all sources • Protecting and supporting rural communities • Protection of Grade 1 agricultural land • Improved health and wellbeing for our communities • Encompass the desire to conserve and enhance natural environment (Kent Downs AONB Unit) • Natural England suggested the following should be referenced: climate change mitigation, reference to a Green Infrastructure Master Plan and a requirement to recover nature, AONB protection, place making and good design • Maintaining a predominantly rural character • Delivery of the infrastructure required to support sustainable communities • Tackling congestion • Supporting and creating jobs and employment (Kent Science Park) • Include commitment to action the Kent Local Nature Recovers Strategy (LNRS) (Kent Wildlife Trust) • Mix of housing types to meet needs of all sectors of the community • Greater focus for development at Sittingbourne as the principal town in the borough • Specifically reference key characteristics of the three settlements, e.g. arts and culture at Faversham • Brownfield development as a priority • Include reference to existing vision for regeneration of Queenborough and Rushenden (Peel Ports) • Reference to smaller and medium sizes sites as well as strategic sites to deliver the borough’s future development needs (developers) • Various requests for vision to be revisited to support the promotion of individual sites/ broad locations (development community)

Appendix 2. Summary of response to the objectives of Regulation 18 consultation
October 2021

Q5 – Do the draft Objectives support the Vision and set appropriate goals for the Local Plan? Please give your reasons, identifying the objectives that you support or objectives that you oppose, explaining any changes you would like to see and why.

Comments on the proposed objectives:

- Objectives adequately support the vision and are clear
- Objective 4
 - Objectives are likely to contribute to development of sustainable lifestyles by residents and employees working within Swale, reducing overall vehicle trips and the need to travel, consistent with national policy, 'transport hubs' in Objective 4 should be defined and include all modes of travel (**National Highways**)
 - Objective 4 assumes (wrongly) that all railway stations are transport hubs
 - Objective 4 could constrain development and would therefore be contrary to national policy
- Objective 5
 - Greater emphasis needed in Objective 5 for the provision of low cost starter and affordable homes for families
- Objective 6
 - Support for objectives, particularly Objective 6 (**Kent and Medway CCG**)
- Objective 7
 - Concerns that Objective 7 cannot be achieved because of the harm large sites have on small villages and settlements

Additional objectives suggested

- Additional objective should be included – “To enhance the natural environment by developing and implementing a Swale Nature Recovery Strategy to reduce habitat fragmentation and increase ecological connectivity” (**Faversham Society**)
- Additional objective needed to include measurable recovery for nature (**Natural England**)
- Additional objective that protects the nationally important landscape of the Kent Downs AONB
- An objective to inform, agree and action the Kent LNRS must be included, committing the Borough to embedding local nature recovery within the planning system.
- Objectives are supported but amendments suggested to include waste in the list of infrastructure. More emphasis should be included to emphasis Swale’s environment and heritage in the objectives and reference to public health should be more explicit (**KCC**)

General comments regarding objectives

- Active travel is only applicable to urban areas
- Concerns around safety for cycling on existing network making it an unrealistic choice
- Investment needed at transport hubs in sustainable locations, e.g. increased car parking provision at Sheerness station
- Objectives not adequately evidenced and not specific enough to Swale
- Objectives need to cover significant issues such as transport and delivering affordable housing
- Climate change mitigation by any reasonable means, including buildings and how they are constructed and powered should be included in an objective
- Objectives need to include reference to the key role of small and medium sites needed to comply with the NPPF and to support a five year housing land supply and support town centres
- Would like information provided on how the objectives will be achieved
- Larger sites should not be supported because they do not integrate with existing communities
- The role of the agricultural sector should be acknowledged in the objectives

Planning and Transportation Policy Working Group	
Meeting Date	8th August 2024
Report Title	Local Plan Review - Housing historic delivery and Local Plan Review housing targets
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officers	Stuart Watson, Project Manager (Policy)
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. That members of Planning and Transportation Policy Working Group are asked to recommend to Policy and Resources the Local Plan housing target as set out in paragraphs 3.1 and 3.2 of this report, that includes a 5% buffer for consultation and examination resilience for the draft Plan Regulation 18 Plan consultation. 2. Members are also asked to recommend to Policy and Resources Committee that proposed growth within the draft Plan Regulation 18 consultation should be for 7,990 dwellings that includes review of the remaining Local Plan Bearing Fruits (1,703 dwellings) as well as the balance housing need (6,287 dwellings).

1. Introduction

- 1.1 As part of preparing the draft Plan Regulation 18 document it is necessary to agree the housing target for the Plan consultation. Setting the housing target will then identify what the balance of housing need will be after existing known supplies of land have been considered. This balance of housing need will determine what additional land should be considered for allocation in the Regulation 18 consultation.
- 1.2 This paper sets out two main issues:
 - Housing historic delivery up to 1 April 2024; and,
 - Local Plan Review Housing target and balance of housing need.

2. Historic housing delivery up to 1 April 2024

- 2.1 The Local Plan Bearing Fruits 2017 (LPBF 2017) Strategic Policy 2 (ST2) sets out the Borough's development targets for the life time of the Plan (years 2014 to 2031). For housing the target set was 13,192 or 776 dwellings per annum with 618 dwellings having been completed by the time of the Plan's examination in 2016. Strategic Policy 3 (ST3) of LPBF 2017 then set out the settlement hierarchy for the borough and the growth strategy for the new dwellings proposed within the Plan.
- 2.2 Table 4.3.4 (page 54) in LPBF 2017 sets out the Growth Strategy for the Plan by settlement hierarchy and is a predominately Sittingbourne (tier 1 settlement) led approach with moderate levels of development set for Faversham (tier 2), Queenborough and Rushenden, and Minster and Halfway (tier 3).
- 2.3 Analysis has been carried out to determine the actual performance of housing land supply and delivery since examination of the Plan against the growth targets of LPBF 2017, with the findings set out in table 1 below.
- 2.4 Between 1 April 2016 and 31 March 2024, 6,082 dwellings have been delivered and including the 618 before examination of the Plan gives a total dwellings completion of 6,700 during the Plan life time to date, an average of 670 dwellings per annum (6,700 dwellings/10 years). This means that 51% of the intended dwellings for the Plan period have been delivered ($6,700/13,192 * 100$) in the first 10 out of 17 years and gives a good indication the LPBF 2017 is on course to meet the objectives that were set for housing growth.
- 2.5 In addition to completions during the Plan period there is also a significant amount of dwellings that have gained planning consent but have not yet been built out. At 1 April 2024 there were 7,047 dwellings consented and not built out totalling 53.4% of the LPBF 2017 target ($7,047/13,192 * 100$) and this provides a strong indication that the existing Plan strategy will continue to perform well against its housing target.
- 2.6 Table 1 below sets out the quantum of dwellings that have been delivered and those consented but not built out and their location against the targets of LPBF 2017. When comparing the location of completed dwellings and those consented and not built out against the LPBF 2017 growth targets it can be identified that growth in Sittingbourne and Queenborough and Rushenden are falling considerably short of target by 16.8% and 11.2% respectively whilst growth in other non Plan target areas has been considerable, in excess of 21.7%. This means that whilst lower tier settlements' targets have been broadly met, targets for two of the Borough's highest settlements have been considerably missed. The location of the top 5 other settlements not in the Plan target areas has been set out in table 2 below.
- 2.7 Under the LPBF 2017 target to deliver 13,192 dwellings, 6,700 dwellings have been completed with 7,047 dwellings consented, which means that there is a positive balance of 555 dwellings to date providing that all permitted dwellings are built out.

2.8 Table 3 below sets out that at 1 April 2024 there only remains 1,703 dwellings on Local Plan Bearing Fruits 2017 allocated sites that have not been consented and their location against the Plans growth strategy. The table shows that Sittingbourne and Queenborough & Rushenden have the two largest amounts of dwellings left to gain planning from allocated land whilst there are only minimal allocations in other settlements in the growth strategy.

2.9 Whilst the data presented demonstrates the Council is making good progress against the targets set out in the Local Plan Bearing Fruits 2017, the NPPF on Plan making and housing targets has since been amended. These amendments include the requirement to review Local Plans that are more than 5 years old and as part of that review to use the Government's Standard method for calculating a local housing need. The Council's local housing need under the Government's standard method in April 2024 is 1,040 dwellings per annum. This is an increase of 264 dwellings against the LPBF 2017 annual target of 776, which is an uplift in requirement of 34%. The next section below looks at the Council's Local Housing need at 1 April 2024 and how it determines a housing target for the draft Plan Regulation 18 consultation that is scheduled for later this year.

Table 1. Local Plan Bearing Fruits 2017 target comparison to supply and completions 1 April 2024

	LPBF 2017 target	Actual Performance (completions + extants)	Difference	Total (completions + extants)	% extant permissions 2023/24	Extant permissions 2023/24	% Completions	Completions 2016/17 to 2023/24
Sittingbourne	43.5%	26.7%	-16.8%	3,518	29%	2,065	24%	1,453
Faversham	17.1%	16.3%	-0.8%	2,155	10%	734	23%	1,421
Sheerness *0%	0.0%	3.3%	3.3%	431	2%	131	5%	300
Queenborough and Rushenden	12.3%	1.1%	-11.2%	140	0%	2	2%	138
Minister and Halfway	14.7%	15.5%	0.8%	2,037	19%	1,370	11%	667
Boughton *below 1 %	0.4%	0.2%	-0.2%	25	0%	10	0%	15
Teynham	4.0%	3.8%	-0.2%	495	5%	330	3%	165
Newington	1.3%	3.1%	1.8%	405	3%	227	3%	178
Iwade	6.0%	4.7%	-1.3%	618	7%	521	2%	97
East Church *below 1 %	0.2%	0.7%	0.5%	95	0%	6	1%	89
Leysdown *below 1 %	0.1%	3.1%	3.0%	409	0%	11	7%	398
Other		21.7%		2,855	23%	1,640	20%	1,215
Total				13,183	100%	7,047	100%	6,082

Table 2. Parishes with five largest supply and completions not within Local Plan Bearing Fruits 2017 strategic approach 1 April 2024

	% Total (other location completions + extants)	Total (completions + extants)	% extant permission 2023/24	Extant permissions 2023/24	% Completions	Total completions 2016/17 to 2023/24
Borden	29%	739	43%	713	3%	26
Tonge	25%	652	24%	391	27%	261
Bapchild	17%	449	18%	293	16%	156
Upchurch	9%	240	7%	113	13%	127
Bobbing	7%	187	4%	60	13%	127

Table 3. Location and quantum of remaining Local Plan Bearing Fruits allocations without planning consent at 1 April 2024

	LP 2017 allocations not consented (%)	LP 2017 allocations not consented (dwellings)
Sittingbourne	24%	407
Faversham	5%	88
Sheerness		
Queenborough and Rushenden	61%	1043
Minister and Halfway	4%	60
Boughton	1%	21
Teynham	3%	43
Newington		
Iwade	2%	31
East Church		
Leysdown	1%	10
Total	100%	1703

3. Housing target and balance of housing need April 2024

- 3.1 The Council's local housing need is determined by the current Government's Standard Method that applies the Office for National Statistics (ONS) household projections for 2014 with an uplift based on the affordability ratio for average house prices to average workplace based earning (ONS 2023). The local housing need for Swale is currently 1,040 dwellings per annum - a change from 1,086 dwellings at 1 April 2023. This change is largely due to the affordability ratio dropping from 10.95 to 9.6 in March 2024 and a slightly lower household projection for the years 2024 to 2034. **Under the standard method the Council's need for the Plan period to 2040 (16 years) would be 16,640 dwellings.**
- 3.2 For the purpose of Plan drafting and resilience through the consultation process and Plan examination process it is appropriate to apply a buffer to this figure to cover any removal of housing sites. A buffer of 5% should ensure that there will not be the need to consult on further sites late in the Plan drafting process. **Applying a 5% resilience buffer to 16,640 dwellings for the proposed Plan period would result in a proposed Local Plan housing target of 17,472 dwellings.**
- 3.3 When considering how the housing target will be addressed during the Plan period it is appropriate to make an allowance for existing supplies of housing land supply and a projection for likely market trends. These forms of supply will greatly reduce the need for new land to be found for allocation and include:
- the extant stock of sites with planning consent considered deliverable during the Plan period;
 - the remaining Local Plan Allocations without planning consent that could be rolled forward into the Local Plan Review;
 - made Neighbourhood Plan allocations without planning consent; and,
 - an allowance for sites (known as windfall) that would come through the market and gain planning consent during the Plan period that have not been identified in the Local Plan.
- 3.4 With regards to known supply the Planning Policy officers identified that at 1st April 2024 there were 7,047 dwellings on sites with planning consent that have not been built out. The monitoring also identified that there were 1,703 dwellings on the remaining stock of Local Plan allocated sites without planning consent.
- 3.5 Further, the Council can also include recently made Neighbourhood Plan allocations or those likely to be made that have not gained planning consent. This includes both the Boughton-Under-Blean and Dunkirk Neighbourhood Plan (made 2023) that allocates 1 site for 12 dwellings and The Faversham Neighbourhood Plan (referendum Autumn/Winter 2024) that proposes 10 allocations totalling approximately 219 dwellings. The Faversham Neighbourhood Plan, once made, will supersede the Faversham Creek Neighbourhood Plan including any remaining allocations from that Neighbourhood Plan.

- 3.6 Based on windfall sites analysis carried out to support the Council's 5 year housing land supply position at a base date of 1st April 2024, it can be determined that after existing permitted small sites (1 to 4 homes) have been considered to be built in years 1 to 3 of the Plan period the Council can expect a small sites windfall allowance of 80 dwellings per year for the remaining 13 years of the proposed 16 year Plan period. This means there is a potential small sites windfall allowance of 1,040 dwellings for the Plan period.
- 3.7 A further windfall allowance can be made for large sites (5 or more dwellings) during the Plan period after both existing permitted large sites have been built out and non strategic site allocations will have been considered built out in years 1 to 10 of the Plan period. Based on this approach the Council can expect a large sites windfall allowance of 194 dwellings per year for the last 6 years of the proposed plan period. This means there is a potential large sites windfall allowance of 1,164 dwellings for the Plan period.
- 3.8 Table 4 below sets out the housing land supply knowns and allowances and that at 1st April 2024 demonstrate there is a balance of housing need for the Local Plan Review of 6,287 dwellings.
- 3.9 Due to the length of time since the Local Plan "Bearing Fruits" was adopted it is appropriate to reassess the remaining allocations without planning consent to determine if they still remain suitable and deliverable for the new plan period. However, this approach is not necessary for the Neighbourhood Plan allocations due to their having either been made recently or likely to be made before submission of the Local Plan.
- 3.10 **This means that future growth of the Borough should Plan for a total 7,990 dwellings (1 April 2024) that would include review of dwellings on remaining Local Plan allocations (1,703) as well as the balance of dwellings need (6,287).**

Table 4. Balance of housing need for the proposed Plan period under Government Standard method

A	Local Plan Housing need target 2024 to 2040	17,472	
B	Extant planning consents		7,047
C	Remaining LP 2017 allocations		1,703
D	Neighbourhood Plan allocations		231
E	Small windfall sites allowance		1,040
F	Large windfall sites allowance		1,164
G	Known supply and allowance (B to F)	11,185	
	Dwellings requiring new land allocation (A-G)	6,287	

4. Proposals

- 4.1 That members of Planning and Transportation Working Group are asked to recommend to Policy and Resources committee the Local Plan housing target as set out in paragraphs 3.1 and 3.2 of this report, that includes a 5% buffer for consultation and examination resilience for the draft Plan Regulation 18 Plan consultation.
- 4.2 Members are also asked to recommend to Policy and Resources committee that proposed growth within the draft Plan Regulation 19 consultation should be for 7,990 dwellings that includes review of the remaining Local Plan Bearing Fruits (1,703 dwellings) as well as the balance housing need (6,287 dwellings).

5 Alternative Options Considered and Rejected

- 5.1 The National Planning Policy Framework amended in December 2023 changed housing targets from statutory to advisory (in certain, evidenced circumstances) and allows for Councils to consider an alternative lower target than that set by the Standard Method for setting a Local Housing Need. The Council commissioned evidence to identify whether there is an exception circumstance for a lower housing requirement for Swale with early findings indicating that there were not. Since publication of the December 2023 NPPF a new Government was elected in July 2024 with a mandate of changing housing targets back to mandatory and increasing yearly build out rates for the nation from 300,000 to 370,000 dwellings.
- 5.2 At time of writing this report a consultation on the next version of the NPPF has just been launched that does not fundamentally changed the approach to Plan making. However, the consultation includes an alternative standard method of applying the MHCLG dwelling stock estimates 2023 and applying an uplift based on the affordability ratio of average house price to average workplace based earning (ONS 2023). The proposed approach would increase the local housing need for Swale from 1,040 to 1,061 dwellings, an increase of 336 dwellings over the proposed Plan period. At this stage any changes to the NPPF and standard method are only those proposed and are subject to consultation and could be changed. This means that use of the existing standard method for calculating a local housing need provides a starting point for Local Plan Review housing target. Should the revised Standard Method become adopted then this increase in housing requirement could be accommodated through the 5% resilience buffer as presented in this report.
- 5.3 The 5% resilience buffer to the Council's Local Housing need has been discussed informally with members and is presented as a reasonable option to ensure that there will not be a need to consult on additional sites late in the Plan drafting process.

6 Consultation Undertaken and Proposed

- 6.1 The approach to setting a Local Plan housing target and proposed growth within the Local Plan Review has been discussed informally with members of this working group. The Local Plan Review draft Plan Regulation 18 that will go out for statutory consultation later this year will provide formal consultation on these matters.

7 Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the economic objective of the Corporate Plan – To progress a Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	The implications of this report will have no specific budgetary implications.
Legal, Statutory and Procurement	Preparation of a Local Plan is carried out under a national legislative and regulatory framework.
Crime and Disorder	None identified at this stage.
Environment and Climate/Ecological Emergency	The Local Plan will be supported by its own Sustainability Appraisal and Habitats Regulation Assessment at each key stage in decision making.
Health and Wellbeing	None identified at this stage
Safeguarding of Children, Young People and Vulnerable Adults	None identified at this stage.
Risk Management and Health and Safety	None identified at this stage.
Equality and Diversity	None identified at this stage.
Privacy and Data Protection	None identified at this stage.

8 Appendices

None.

9. Background Documents

None.

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Planning and Transportation Policy Working Group	
Meeting Date	8 th August 2024
Report Title	Potential Local Plan Employment Sites Discussion
EMT Lead	Emma Wiggins, Director of Regeneration & Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officer	Natalie Earl, Planning Manager (Policy)
Classification	Open
Recommendations	<ol style="list-style-type: none"> 1. Members to discuss and note the potential employment sites available for allocation through the Local Plan; and 2. Members to recommend to Policy and Resources Committee their preferred sites for employment allocation for consultation through the Reg 18 Local Plan.

1 Purpose of Report and Executive Summary

- 1.1 The purpose of this report is to set out the potential employment sites that could be drafted into allocations in the Reg 18 Local Plan (LP).
- 1.2 As part of preparing the Reg 18 consultation document it is now timely for Members to discuss, and set out their preferences for, employment sites for allocation.
- 1.3 This discussion paper sets out the evidenced need figure for employment allocations through the Local Plan, and the available sites to meet that figure.
- 1.4 Providing the preferred employment sites for allocation in the Reg 18 LP will enable officers to complete strategic and site allocation policy writing and will also enable other pieces of evidence base such as Transport Modelling, the Sustainability Appraisal and Habitats Regulations Assessment to move forward.
- 1.5 The Employment Land Review Addendum 2024 recommended a need to allocate 73ha of industrial land and this report sets out the available sites across Swale that could meet that need figure.

2 Background

- 2.1 The recently agreed Employment Land Review Addendum (ELR) 2024 found an additional industrial land need requirement of 73ha – with a demand of 48ha, plus a margin of 25ha. This is a higher requirement than that of 2018 ELR which concluded that 41ha of industrial and warehouse land was required. The ELR suggested that the Council could view the 48ha (of new land) as the minimum needed for the plan period, with the higher 73ha requirement (inclusive of the 25ha margin) the target to aim for.

- 2.2 The unmet industrial need should be met by new site allocations. In considering sites to meet this need the ELR assessed sites for their suitability and attractiveness to the market. An important consideration for the supply of industrial land is ensuring as much as possible is on the western side of the Borough and particularly in Sittingbourne/Isle of Sheppey where demand is highest and land is most accessible to the Swale labour force and the strategic road network.
- 2.3 Informal discussions with members on the quantum of employment land to be allocated, resulted in officers looking for allocations to meet the higher figure of 73ha.
- 2.4 The ELR assessed all of the sites that were submitted through the call for sites for employment and it identified only a modest number of sites with good prospects. These total 17.7 ha – enough to meet half the minimum need, and these are mostly on the western side of the Borough. Ten ‘possibly suitable/deliverable’ sites are identified, and could collectively potentially provide almost 100 ha of employment development land. The ELR considered the borough’s general industrial needs over the Plan period could be met from a selection of these sites. The Council therefore have a choice of sites within this list as the Local Plan only needs to allocate a maximum 73ha out of the possible 100ha on the list in Table I in Appendix I.
- 2.5 The choices for employment sites need to be looked at in conjunction with the potential housing sites to ensure the LP is promoting sustainable development and to reduce unsustainable commuting levels and patterns.
- 2.6 It is recommended that:
- most of the sites in the table in Appendix I in the column titled ‘Good’ are put forward for allocation as the ELR has assessed those as being the most suitable of all of the available sites. If all those sites are chosen, they add up to 17.7ha.
 - the two large sites in Faversham (SBC17/094 and CFS50) are allocated only if those sites are also to be allocated for housing to ensure that they are sustainable, mixed use developments.
 - the remainder of the allocations are chosen from those sites in Sittingbourne, Sheerness/Queenborough and Rural West as they are in the area identified by the ELR as most in demand by the market.
 - Informal discussions with members have indicated that sites CFS47, 30 and CFS50 are potentially the most constrained. Removing those sites would leave a total of 72.8ha against a target of 73ha.
- 2.7 There are interdependencies between housing and employment allocations which mean a decision on employment land may need to be revised if a subsequent positive decision, at a future meeting, on a housing allocation is for a mixed-use

scheme which requires the employment element in order for it to progress (if this employment element was not initially favoured by members).

Offices

- 2.8 The requirement for offices has shifted significantly since the 2018 assessment. Both the demand for and the availability of office space remain low and broadly in balance, with the market serving essentially local businesses. The unmet need for new office floorspace is just 1.1 ha. The ELR recommends that the focus should remain on the refurbishment of existing stock and/or providing good quality flexibly industrial/hybrid space.
- 2.9 Due to the relatively small need figure there are choices to be made. The employment policies within the Reg 18 Local Plan could be written to actively promote the upgrading of existing offices, or 1.1ha of office space could be specifically allocated within one of the larger mixed use allocations once those have been agreed upon.
- 2.10 Another option is to not allocate any office space and to continue to allow the market to deliver the small requirement for office space through speculative planning applications, ensuring that they meet the criteria within the LP general employment policies and the criteria of Permitted Development (PD) rights. However, with increasing levels of office space being lost to residential through PD planning applications it may be considered worthwhile allocating the 1.1 ha to ensure that it is delivered.

3 Proposals

- 3.1 The proposal is that Members discuss and note the choice of potential employment sites for allocation which have been assessed through the ELR as good and possible (and are shown in the table in Appendix I) and recommend to Policy and Resources Committee their preferred sites for employment allocation for consultation through the Reg 18 Local Plan.

4 Alternative Options Considered and Rejected

- 4.1 Members could instruct officers to look for employment sites not currently assessed through the ELR but these would then need to be assessed with the same methodology used in the ELR and this could lead to a delay in the overall LP timetable as it would require work not currently timetabled. It is also unlikely that any significant sites would come forward due to the extensive call for sites undertaken and the detailed knowledge of the borough that the Economic Development and Planning teams have of the local economy who have both been unable to find any other suitable sites.

5 Consultation Undertaken or Proposed

- 5.1 The ELR is a piece of technical evidence and has therefore not been consulted on, however stakeholders can comment on its findings and how they have been interpreted at the Reg 18 stage of the LP consultation.

6 Implications

Issue	Implications
Corporate Plan	<p>The proposals in the report align with the following Corporate Plan action:</p> <ul style="list-style-type: none"> • A Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	Through providing good quality employment space that meets the full demand, the Council will benefit through business rates and inward investment and through the provision of more employment opportunities for its residents.
Legal, Statutory and Procurement	Allocating an adequate quantum of employment land ensures the Council is meeting its statutory requirements as prescribed in the National Planning Policy Framework.
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	Ensuring that the right employment is allocated in the right places to promote sustainable patterns of development could help to reduce out commuting and promote more sustainable patterns of commuting.
Health and Wellbeing	No implications identified at this stage.
Safeguarding of Children, Young People and Vulnerable Adults	No implications identified at this stage.
Risk Management and Health and Safety	No implications identified at this stage.
Equality and Diversity	No implications identified at this stage.
Privacy and Data Protection	No implications identified at this stage.

7 Appendices

- 7.1 The following documents are to be published with this report and form part of the report:

Appendix I: Table of potential sites assessed as 'good' or 'possible' in the ELR 2024

Appendix II: Map showing the spatial distribution of potential sites from Appendix I Table.

8 Background Documents

- 8.1 [Employment Land Review Update 2024](#)
- 8.2 [Employment Land Review 2018](#)

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Appendix I: Table of potential employment sites assessed as ‘good’ or ‘possible’ in the ELR 2024

Site Reference	Site Name	Good (Potential developable area Ha)	Possible (Potential developable area Ha)	Positives	Constraints
Sittingbourne			32.6		
CFS34	Land adj. Kemsley Substation, ME10 2FE		5.0	Strong market area.	It is questionable how much of the site is available due to development needing to wrap around the existing electricity substation. There are also existing pylons/cables/pipelines on site and potential contamination.
SBC17/005	Land at Pheasant Farm (West), Howt Green		1.6	Good market area.	This would only be a small scale development and it is not in an established employment location. Access on to the A249 is poor.
SBC17/008	Land fronting East side Bobbing Hill		1.0	Good market area.	This would only be a small scale development and it is not in an established employment location.
CFS24 (and R1)	Ridham Dock – redevelopment		25.0	Owner interest. Strong market area.	There could be a possible loss of wharfage. However, the site promoter is exploring how dock activity

					could be rationalised as the dock facility is safeguarded through the Kent and Medway Minerals and Waste Local Plan, Existing employment uses would be intensified.
Sheerness/Queenborough		3.7			
CFS47	Land south of Cowstead Farm, Queenborough Road	3.7		Strong market area.	Partially within (southern tip) a Landscape Character Area and Flood Zone 2 and 3 and a coastal change management area.
Faversham			41.0		
SBC17/094	Land adj to A2 at Love Lane and West of Salter's Lane to Brenley Corner (Duchy of Cornwall site)		20.0	Large site. Likely to be market attractive.	It is in close proximity to the Kent Downs National Landscape (Former AONB) to the south, and in relatively close proximity to the Swale Level Area of High Landscape Value to the east. A railway line bisects the site. Potential Brenley Corner junction capacity and safety issues.
CFS50	Land east of Faversham Expansion		21.0	Large site. Likely to be market attractive.	The site is located within open countryside with a predominately flat open

					landscape and large buildings could impact on the setting of both of the nearby landscape designation areas.
Rural West		13.5	3.0		
SBC17/095	Hartlip Industrial Estate – southern expansion	5.9		Good market area. Extension to existing.	It is a remote location away from main industrial areas and it is unknown if it is available in the plan period.
REG3197	Land at Marshlands Farm, Lower Road, Minster	5.6		Good market area. Being actively promoted. Neighbouring existing estate.	Small scale, landscape constraints as the site is adjacent to farmland and close to the Elmley National Nature Reserve.
REG3044 (R10)	Newington Industrial Estate - southern expansion	2.0		Expansion of existing. Good market area.	Partially within the Kent Minerals safeguarded area and possible highway issues on to the A2.
SBC17/025	Land at Radfield Farm, London Road, Bapchild		3.0	Reasonable market area.	Small scale. Not an established employment area.
Rural East		0.5	16.1		
CFS5 (R8)	Waterham Industrial Estate – expansion East	0.5		Expansion of existing.	Weak market area where demand is weakest. Site would only appeal to local demand and viability could be challenging.
30	Dargate Plumpudding Lane		12.9	Owner interest.	Unproven market. Site could attract

					industrial/warehouse uses, but is located in the east of the Borough where demand is weakest. Site would only appeal to local demand but viability could be challenging.
LPR2470 (R15)	Lamberhurst Farm, Yorkletts - proposed southern expansion		3.2	Expansion of existing.	Landscape constraints will limit possibilities. Unproven market. The site is remote and accessed via a narrow country lane and lacks prominence to the A299. Site is only likely to be attractive to local occupiers who have links to the area. Viability is likely to be challenging in this area, as rents for units in this location will be lower than seen elsewhere.
TOTAL		17.7	92.7		

Source – ELR Addendum 2024: Table 6.2 Potential New Land (Assessed as Good or Possible in the ELR Addendum)



Swale Employment Land Review

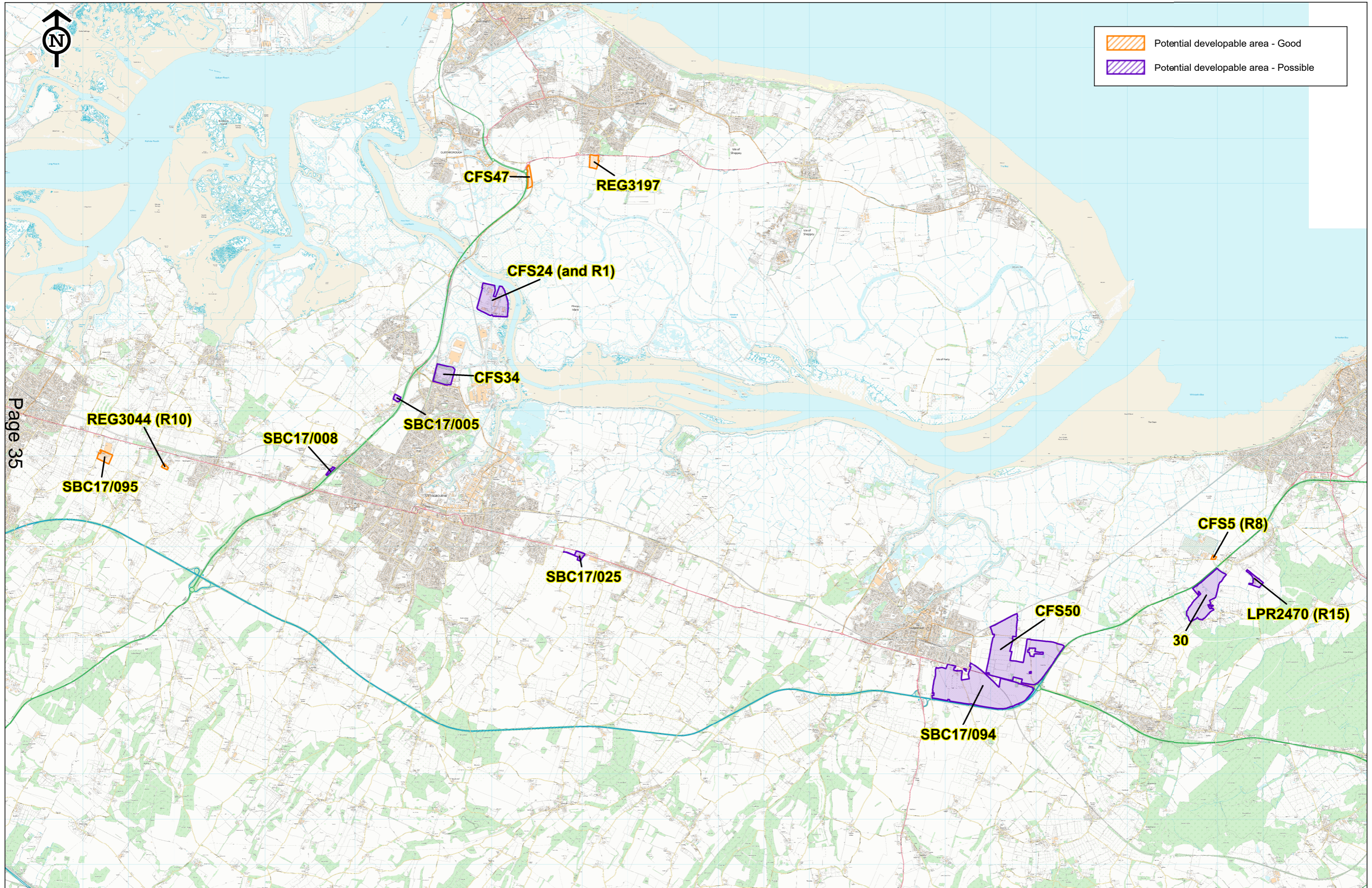
June 2024

Scale: NTS

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	Potential developable area - Good
	Potential developable area - Possible



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