

Planning and Transportation Policy Working Group	
Meeting Date	13 th March 2025
Report Title	Local Plan Review – Call for sites and HELAA progress
EMT Lead	Emma Wiggins, Director of Regeneration and Neighbourhoods
Head of Service	Joanne Johnson, Head of Place
Lead Officers	Stuart Watson, Project Manager (Policy) Martin Ross, Principal Planning Policy Consultant
Classification	Open
Recommendations	1. That members note the update report on the Call for Sites 2024 and the progress being made on the Housing Economic Land Availability Assessment (HELAA).

1. Introduction

1.1 As part of informing the options for land that can be considered for future development, and following requests from the Planning and Transportation Policy Working Group for defined development opportunities to be specifically explored, a new call for sites exercise requesting interested parties to submit land for consideration as part of the Council Local Plan Review was carried out from autumn 2024. This report describes the call for sites 2024 process and provides a high level summary of the progress being made on drafting the Council's Housing Economic Land Availability Assessment.

2. Call for Sites 2024

2.1 The NPPF at paragraph 72 sets out that strategic policy making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. To help inform this objective the Council has carried out a number of a call for sites exercises.

2.2 At members' request a further call for sites exercise was carried out from autumn 2024, inviting landowners and other interested parties to make known land that could be considered for the Local Plan Review. In line with the member steer,, the exercise also made clear in its publicity that the council was looking to specifically increase site options within Sittingbourne and specific sites for Park Homes.

2.4 Historically, the Council has carried out a number of call for sites exercises, the last being in Spring 2022 when 34 sites were submitted for consideration. Due to members' steer to seek specific types of sites, new ways to publicise the exercise were carried out this time, in addition to existing methods. This has resulted in an uplift to in submissions to 101, nearly a threefold fold increase compared to 2022.

2.5 The highlights of the 2024 Call for Sites exercise are:

- The exercise ran for six weeks between 3rd October and 14th November 2024;
- In addition to established publicity approaches of advertising on the Council's website and social media channels and letters/emails to interested parties from the Policy contacts database, the following new approaches were used:
 - Town centre surveys were conducted by officers to identify vacant commercial units, followed by land registry searches so that letters could be sent to those property owners;
 - Targeted email were sent to the Council's business contacts from the Economic Development team;
 - Targeted email were sent to charitable organisations with landholdings;
 - Targeted emails were sent to local property auctioneers;
 - Targeted emails were sent to identified Park Homes companies (both local and national operators);
- Nearly 3,000 communications consisting of letters and emails were sent out advertising the exercise.
- Site submissions were directed towards a portal on the Council website. However, it was also possible to submit by email or letter submissions. Of the 101 submissions 93 were via the portal and 8 via email.

2.6 Whilst the 2024 Call for Sites exercise was a success in terms of levels of engagement and site submissions received, understanding the suitability and capacity of these sites for development is a work in progress. Of the 101 submissions, 34 failed the initial screening stage for the following reasons:

- 6 submissions fell below the HELAA site development area size threshold;
- 18 submissions were isolated in the countryside; and,
- 10 were duplicates of previous submissions.

2.7 Of the 67 submissions being admitted to the HELAA process, 50 are for residential use, 14 for a mixed used and 3 for employment use.

2.8 Of the specific types of site the Council were seeking, only 5 of the 67 are within Sittingbourne urban area, and while this may be disappointing given the specific focus of the exercise following members request, all 5 are brownfield and are within the designated town center boundary, or close to it. These sites are:¹

- The Classic Cinema, High Street
- 10-14 High Street
- St Michaels House and Langs Bar, St Michaels Road
- The Old Pumping Station, St Michaels Road
- Sutton House, Old London Road

¹ Sites shown are submissions only. Each site is being assessed as described in paragraphs 2.11-2.14 of the report

- 2.8 At this stage, early estimates are that, if all are deemed suitable, that around 150-200 dwellings could be achieved from these sites. This is taking account of the employment/retail/housing split on some of the sites and noting that no site is larger than 0.2ha. An established methodology will also need to be agreed upon for increasing site density in the most sustainable locations, once site assessments are completed.
- 2.10 With regard to Park Homes, there was some success with 9 submissions of Park Home sites or Park Homes mixed with market homes, including the Isle of Sheppey Strategic Caravan Sites, which is a adjacent collection of 8 caravan sites merged. These sites are:²
- Home Farm, Breach Lane, Lower Halstow
 - Land on north side of Canterbury Lane, Upchurch (mixed)
 - Land on south side of Starborne, Oak Lane, Upchurch
 - Land north of Bricklands, Newington (mixed)
 - Syndale Park, London Road, Faversham (mixed)
 - Isle of Sheppey Strategic Caravan Sites (mixed)
 - Hollybush Farm Caravan Park, Oak Lane, Minster-on-Sea
 - Estuary View, Bell Farm Lane, Minster-on-Sea
 - Golden Leas Holiday Park, Bell Farm Lane, Minster-on-Sea
- 2.11 At this early stage, in the unlikely event that all sites are found suitable, we estimate that around 1000 park homes can be provided. Difficulties in making this estimate at this point include assessing the appropriate dwelling (market home) mix and how many (net) will be new on an existing caravan site, or an existing mixed park homes and caravan site. It is also difficult to establish currently which are holiday caravans and which are park homes in some cases, and several sites are currently undergoing change and construction, so it is difficult to monitor.
- 2.12 It should be noted that some submissions are very similar to previous submissions, that have not been categorized as direct resubmissions. For example, there are sites with addition parcels of land added or removed and boundary amendments that may include access strips, based on previous advice or comment from the Policy team.
- 2.13 The team have recently completed the site visits and are currently completing technical assessments, including comparing the sites to mapped constraints and interpreting site observations.
- 2.14 The sites are being considered across a number of topic areas including site sustainability, landscape and environmental impacts. The sites will be given an individual categorisation of suitable, potentially suitable (normally because site specific evidence based work will be needed to establish suitability where there is uncertainty) and unsuitable. There is then an overall suitability score, based on the worst outcome from the separate topic conclusions.

² Sites shown are submissions only. Each site is being assessed as described in paragraphs 2.11-2.14 of the report

- 2.15 Alongside suitability, overall achievability and availability will be assessed. Achievability is generally assessed as economic viability. For example, there might be some heavily contaminated sites in sensitive groundwater areas where the proposals may not be economically viable, which will affect what can be achieved or delivered on site. Availability is whether the site is available now or within the plan period, for example, it might be available in years 6-10 if it is currently occupied by a building whose lease expires in 2030. However, with some sites, when it will become available may be uncertain, and subsequently will be considered unavailable.
- 2.16 If a site is considered available, suitable and achievable, it passes the HELAA assessment and will be considered alongside the other sites that have passed.
- 2.17 Once the assessments are complete, they will be reported to a future PTPWG meeting, initially outside the context of the growth options.

3. Conclusion

- 3.1 The preparatory work for this exercise exceeded previous call for sites in terms of consultation reach and additional bespoke research, in response to members' requests. Whilst this has helped to achieve a larger number of site submissions, comparatively speaking, the Council have not received many brownfield/previously developed land submissions, including in Sittingbourne Town Centre.
- 3.2 The team are satisfied that they have taken all reasonable steps through the Call for Sites process in our search for more urban sites, particularly in Sittingbourne, at the current time.

4. Proposals

- 4.1 That members note the update report on the Call for Sites 2024 and the progress being made on the Housing Economic Land Availability Assessment (HELAA).

5. Alternative Options Considered and Rejected

- 5.1 The report is for information only so no alternatives are considered.

6. Consultation Undertaken or Proposed

- 6.1 The consultation undertaken for the Call for Sites is set out above. Further consultation will take place during the Regulation 18 stage of the Local Plan consultation.

7. Implications

Issue	Implications
Corporate Plan	The proposals in the report align with the following Corporate Plan action: <ul style="list-style-type: none">• A Local Plan with local needs and capacity at its heart.
Financial, Resource and Property	No implications identified at this stage.
Legal, Statutory and Procurement	No implications identified at this stage.
Crime and Disorder	No implications identified at this stage.
Environment and Climate/Ecological Emergency	No implications identified at this stage.
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.

8.0 Appendices

8.1 None

9. Background Documents

9.1 None

