

Partnership comments and Council responses in respect of the drafting of the 2010-2011 SHLAA

Site ref	Site address	Name	Comment	Response
SW/005	The Foundry	Paul Sharpe Associates	Insufficient weight is being given to the issue of ground contamination in this area and the adjacent presence of the Klondyke Estate and its problems.	The issue of contamination will be further highlighted. However, at this stage it is considered to be an issue affecting phasing rather than one of principle. In terms of its phasing, doubts over the site have placed its delivery almost entirely beyond the SHLAA/Plan period. Partial change agreed.
			In my view, the Queenborough/Rushenden regeneration will not come forward unless and until all the key sites are either under single ownership or single control, ie including SW/005, SW/333, SW/335 and, possibly, SW/025.	The Council disagrees that the single ownership of all the sites is the means necessary to deliver all the sites in question. SW/335 is large enough in its own right to come forward and provide the uplift to enable other sites to come forward. It also represents the largest proportion of the overall development numbers. The smaller sites are phased later in the process in recognition of this. No change agreed.
SW/022	Bramblefield Farm, Grovehurst Road	Paul Sharpe Associates	In the site description, there is a typing error, ie "North West" rather than "North East" Sittingbourne.	Noted. Text amended. Change agreed.
			Bearing in mind the conclusion with regard to SW/040, the conclusion of "not currently developable" is inconsistent if sites SW/022 and 040 are to be considered comprehensively.	SW/022 was rejected to avoid potential double counting within SW/022. No change agreed.

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SW/025	Nil Desperandum	Paul Sharpe Associates	<p>Vehicular access to this site is constrained and it is questionable whether satisfactory access to a public highway can be achieved. Mention should also be made of the industrial access along the northern boundary of the site to the Coal Washer Wharf. With vehicular access, of necessity, routed through an existing, relatively unattractive residential area the ability to generate high values is questionable.</p> <p>Bearing in mind the reliance of this area upon redevelopment on SW/335 the projected delivery in 11-15 years is in my view ambitious and should be set back to 16-20 years like SW/005.</p>	<p>Mention will be made of these issues. However, development on the main regeneration area would have been underway for some years and as such delivery in the latter part of the 11-16 period is considered reasonable.</p> <p>Partial change agreed.</p>
SW/028	Land at Riddles Farm	Paul Sharpe Associates	I acknowledge an interest in this site having advised the landowner.	<p>Noted.</p> <p>No change agreed.</p>
SW/039	Shellness Road/Park Avenue, Leysdown	Paul Sharpe Associates	<p>With regard to Step 4 and Step 5, I disagree with the comments and conclusion. This site has been allocated and identified for housing for many years. It has not proved attractive to the housing market over a number of cycles of the housing market. I see no reason to believe that circumstances have changed and, in the current and medium term, I cannot believe that the site will be attractive or viable to the market.</p>	<p>Whilst acknowledging the long term nature of the allocation of this site, it has not been due to the unattractiveness of the site to developers, rather than, until more recently, inertia by the landowner. Viability testing has been found to show the site viable within the 0-5 year period.</p> <p>No change agreed.</p>
			<p>The track record of this site suggests that it should (at best) be indicated in the 11-15 year supply period.</p>	<p>See above.</p> <p>No change agreed.</p>
SW/045	Oak Lane, Upchurch	Paul Sharpe Associates	The SHLAA should record whether this is a single allotment, whether there are a number of allotments here and whether they are informal, private allotments or	Agreed.

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			statutory allotments. Also, whether or not they are well used would constitute additional key information.	Change agreed.
SW/050	Chilton Manor, Sittingbourne	Paul Sharpe Associates	In Step 2, in the 2 nd para, reference is made to development here eroding the current separation between Sittingbourne and Rodmersham. I disagree with this statement as there is no narrow gap between the two settlements and indeed they are not intervisible.	Agreed. Change agreed.
SW/069	Land at north east Sittingbourne	Paul Sharpe Associates	In Step 1, I doubt whether the Employment Land Review advises that this site is a potential extension to the Eurolink Estate.	The ELR assessed land to the north as being suitable as an extension to the established Eurolink industrial estate. Text will be clarified/ Change agreed.
SW/071	Frogna Lane, Teynham	Paul Sharpe Associates	Firstly, I have to declare an interest in this site as I act for a client who owns part of this site. However, I do not act for the client in relation to this particular site.	Noted. No change agreed.
			Achievability - whilst reference is made to the possible need to provide a contribution towards highway infrastructure, namely the Sittingbourne Northern Relief Road, it may also be necessary for the development to contribute towards the Sittingbourne Southern Relief Road.	It is too early to make judgements on this issue; however, a reference could be made that this will be a matter for consideration as part of any CIL schedule. Partial change agreed.
			Also, no reference is made to the views of the Highway Authority regarding additional traffic loading on the A2.	Change agreed.
SW/073	Land at Pheasant Farm	Paul Sharpe Associates	I declare an interest here as I act for the landowner in this case.	Noted. No change agreed.

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			Regarding Step 2, I disagree that the site should not proceed to Step 3. In my view the argument that the site forms part of the gap between Sittingbourne and Iwade is not a strong one as the A249 creates a significant boundary and barrier so that the landscape to the east and west of the A249 is of quite different character. This is confirmed by the Urban Extensions Study.	The Urban Extensions study advises that north of the footbridge crossing the A249 it would be appropriate to conserve the open character of the landscape between settlements. The raised nature of the land here would also heighten impacts. No change agreed.
			Also, the Urban Extensions Study is not as demonstrative about conserving the open character of the landscape between the settlements as is suggested in the SHLAA. In the Urban Extensions Study this is put forward as a suggestion rather than as advice and is, to some extent, contingent upon the simultaneous extension of the boundary of Iwade towards the A249. Conversely, if Iwade is not extended eastward towards the A249 then this suggestion has even less weight.	The UES indicated that an extension at Iwade could occur without critical harm occurring to the gap. In the case of SW/073 such a conclusion was not made. See also above. No change agreed
			Bearing in mind the comment in the final paragraph under Step 2, and bearing in mind the potential identified by the Employment Land Review for employment and the comments made in relation to site SW/040, in my view the Pheasant Farm site should proceed to Step 3. Clearly the site has a potential role in mixed use development including SW/073, 022 and 040.	These are matters for the LDF to consider and cannot be addressed within the SHLAA at this stage. No change agreed.
			With regard to Step 3, the site is in single ownership with a willing developer and should proceed.	See above. No change agreed
			In the context of Step 4, the site is clearly achievable in the context of a comprehensive development including the	See above. No change agreed

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			above mentioned sites.	
SW/075	Great Grovehurst Farm (north)	Paul Sharpe Associates	I declare an interest in this site as I act for both the landowner and development option holder.	Noted. No change agreed
			It is my understanding that this site has been withdrawn from the SHLAA and is promoted solely in relation to the Employment Land Review.	The site has not been withdrawn by the site promoter, although the Council has concluded that it is not suitable for housing. No change agreed
			One particular comment in relation to Step 1, clearly no "strategic gap" currently exists in relation to this site or any other within the Borough.	Noted. Text to be amended
SW/076	Lydbrook Close, Sittingbourne	Paul Sharpe Associates	I firstly have to declare an interest here as I act for Nicholls Transport but in relation to their relocation site and others rather than this particular site.	Noted. No change agreed.
			I can confirm that a material commencement has been made of the planning permission for residential redevelopment of this site.	Noted. No change agreed.
			Also, housing development would have to follow the relocation of the business to a new site but a planning application for relocation can be anticipated within the next few months. Subject to planning permission for relocation therefore, development of the Lydbrook Close site within 5 years may be in prospect.	Having regard to viability advice, the site is phased slightly later from 2016, which also considers the need for the relocation of the existing business. No change agreed.
SW/091	Land adj Western Link, Faversham	Paul Sharpe Associates	It seems to me that the lack of progress with the previous employment allocation was almost certainly due to the continued presence of the brickworks. Perhaps some	The Council is not aware that the brickworks has been a constraint to employment delivery here as it has been

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			time is needed for the market to assess its attractiveness for employment use, including the redevelopment of the brickworks land before considering alternative residential use.	separated from the main body of the development site. The greater constraint has been the owner's aspirations for alternative uses. That said, it is likely that delivery of any employment use might require the inclusion of enabling housing and this is reflected in the report, subject to further testing. No change agreed.
SW/092	Milton Pipes, Church Marshes, Sittingbourne	Paul Sharpe Associates	I agree with the conclusion that this site is not currently deliverable but, in my view, this site is inherently unsuitable for housing.	Noted. No change agreed.
SW/097	Land adj Newington Manor, Newington	Paul Sharpe Associates	An assessment is required as to whether this site forms part of the setting of the listed building. If so, this should be recorded as such within the SHLAA, presumably as a potential constraint.	This issue is addressed in Step 2. No change agreed.
SW/101	Land at Hempstead Lane, Bapchild	Paul Sharpe Associates	Firstly, I need to record an interest in this site which I put forward for inclusion in the SHLAA on behalf of G H Dean & Co.	Noted. No change agreed.
			I question the Landscape Assessment of this site bearing in mind that it lies within the same landscape character area as SW/071 at Teynham.	The Urban Extensions Landscape Capacity Study does not include land at Teynham; however both sites are within the Teynham Fruit Belt as described in the draft Landscape Character and Biodiversity Appraisal SPD. The key difference with the land at Teynham is that it appears as a self contained site, being surrounded on three sides by existing development, and does not intrude into the wider countryside (other

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				than its access road). No change agreed.
			Also, with regard to "land east of Bapchild" whilst the land has, traditionally, been used for orchards for top fruit production it is not now "traditional orchard". Modern, densely planted commercial orchards such as that currently growing on this site are usually decried by landscape architects as alien features.	The Urban Extensions Landscape Capacity study acknowledges the existence of new orchard planting within the wider fruit belt landscape. The landscape is considered traditional in relation to its function as orchard, it is not intended to refer (solely) to traditionally managed orchards. No change agreed
SW/104	Land at Great Grovehurst Farm	Paul Sharpe Associates	I acknowledge an interest in this site as I act for the landowner and have promoted this site to the Local Plan in 2008 and to the SHLAA.	Noted. No change agreed
			In Step 1, whilst the reference to the Employment Land Review findings should perhaps remain, it should also be added that this site has been formally withdrawn from the Employment Land Review by the landowner.	Noted. Text to be amended
			With regard to Step 2, in response to the rhetorical question in the heading, the answer should be "yes" rather than "no".	Noted. Text to be amended
			Again under Step 2, the advice in the Urban Extension Study regarding the conservation of the open character of the landscape between settlements is not as forcefully put as is suggested. The Urban Extension Study confirms that the landscape character either side of the A249 is quite different. Also, the Study's comments regarding conservation of open character is put forward as a	The issue of settlement separation is raised by the UEL, but the sites release is not ruled out by the assessment. Unlike other sites, this site is well contained by infrastructure and is not as visible in the landscape.

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			suggestion rather than advice and is to some extent contingent upon the simultaneous extension of the boundary of Iwade eastwards towards the A249. Conversely, if Iwade is not extended in an eastward direction then conservation of the open character of this piece of landscape is less critical.	No change agreed.
			More to the point, under 'site description', the Great Grovehurst Farm site is (rightly) described as enclosed and detached from the wider area. Consequently, its role in conserving the open character of the landscape between the settlements must be extremely limited at best.	This is why the site is included in the final supply. No change agreed
			The need to reserve land for the potential improvement of the A249/Grovehurst Road junction involving SW/075 or SW/104 is acknowledged.	Noted. No change agreed.
			Agree with overall conclusion.	Noted. No change agreed.
SW/107	Land at Chilton Manor/Muddy Lane	Paul Sharpe Associates	I declare an interest in this site as I act for the landowner and have promoted this site to the SHLAA.	Noted. No change agreed
			In Step 2, in my view the suggestion that development here (in combination with adjacent sites or otherwise) would erode the separation between Sittingbourne and Rodmersham is far fetched. The gap between the two settlements is not narrow and indeed they are not intervisible and therefore this statement cannot be sustained.	The statement is correct, the extent of the constraint is not considered significant in the Council's conclusions however. No change agreed.

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			Regarding the penultimate sentence under Step 2, the landowner would be open to suggested amendments to the boundary of development and the potential of the site should therefore be reviewed in that context.	No further re-assessed is proposed at this stage. In the event that the adjacent site is considered as part of the supply, then this issue could be revisited. No change agreed
SW/111	Milton Pipes, Cooks Lane	Barratt Strategic	The SHLAA should revise its housing delivery timeframe for this site to reflect the NRR post 2021. 60-70 dwellings per hectare might be too ambitious given the property market rejecting flats and housing needs for the Borough reflecting more affordable family housing. These features could affect overall dwelling capacity for this site.	SHLAA assumes density of circa 47 dph, with phasing post 2024. Partial change agreed.
SW/115	Danley Middle School	Paul Sharpe Associates	Something has gone astray as the text here refers to the Hempstead Farm site.	Noted. Change agreed.
SW/116	North east of Iwade	Paul Sharpe Associates	Firstly, again I need to record an interest in this site although owned by a client, it is promoted to the SHLAA by others.	Noted. No change agreed.
		Barratt Strategic	We have an interest in this site, which Ward Homes/Barratt Strategic is promoting for residential through an option agreement with the landowner.	Noted. No change agreed.
			We disagree with the SHLAA findings that do not let the site proceed past step 2 of the assessment. There are a number of factual inaccuracies within the assessment that should be corrected and which may influence consideration of the suitability of the site.	See below.
			Firstly, the site SW/119 referred to is assumed to be the	Noted.

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			<p>housing allocation to the north of All Saints Church, Iwade. This development is now complete and should not therefore be described as 'unimplemented'. SW/116 directly abuts this development and is therefore not 'fairly detached' from existing residential development.</p> <p>The site is located within the Iwade Arable Farmland Character Area an area identified as being in poor condition and of moderate sensitivity. The guidelines proposed require the restoration and creation of landscape, including generic guidance promoting the planting of new community orchards, restoring landscape structure, replacing obtrusive physical barriers and using local and vernacular materials.</p> <p>Ward Homes has shown a commitment to taking account of the need to restore and create landscape, including the concept of Iwade Nature Park based on land east of the village. Iwade Nature Park provides a comprehensive approach to landscape and ecology that resonates with the guidance set out in the draft SPD in restoring landscape structure and creating new habitat opportunities based around woodland, orchards, arable fields and marshland edge. The concept was first considered at the last Local Plan and has informed the design, layout and landscape strategy adopted in the Phase VII development north of the church granted planning permission under application SW/03/0981 and Phase VIII development on land east of Woodpecker Drive, granted planning permission under application SW/09/0756.</p>	<p>Change agreed.</p> <p>The Council's Urban Extensions Study advises that it would be inappropriate in landscape terms to develop north of Sheepfolds, with the express purpose of conserving the rural setting of the historic core of the village to the north and east of the church. Development east of Iwade is considered more sympathetically, provided that it would create a soft urban edge and stronger identity to the village.</p> <p>No change agreed.</p>

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			<p>We believe that this site has the capacity and developer support to apply the necessary landscaping that will help respect the rural setting of the historic core of the village to the north and east of the church</p>	<p>Noted. See above. No change agreed.</p>
			<p>Secondly, there are a number of factual inaccuracies with regard to the assessment of suitability. The site lies within 400m of the village centre with its shops and school provision, and is within 900m of the GP surgery. The prescribed walking distance to a GP surgery is questioned, primarily because there is some inconsistency with other assessments (a figure of 1km is quoted in other SHLAA site assessments) and furthermore, because any distance threshold is only a guide and 900m still represents a good level of accessibility to such a facility by any reasonable assessment.</p> <p>The assessment assumes that the current public transport provision is inappropriate as bus services operate 'once or twice a day'. This is factually incorrect. Service 334 operates hourly from Monday to Friday and on Saturday and offers some Sunday services and bus stops are located close to the site. A copy of the timetable for this route is attached for your consideration. If further growth were allocated to Iwade services may improve and become more frequent still, a fact acknowledged by the assessment.</p> <p>We believe that the assessment should therefore revise its assessment of this site.</p>	<p>This site lies within 800m of the village centre, but exceeds the 800m requirement for access to a GP surgery as stipulated in the SHLAA methodology.</p> <p>The SHLAA methodology requires frequency of bus services to be two or more per hour.</p> <p>Text will be amended to correct inaccuracies, but site will not progress to Step 3 on the grounds that it is not appropriately served in terms of access to GP and public transport services and would have a harmful impact on the landscape which provides a rural setting for the historic core of the village.</p> <p>Partial change agreed.</p>

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SW/123	East of Iwade	Paul Sharpe Associates	Firstly, again I need to record an interest in this site although owned by a client, it is promoted to the SHLAA by others.	Noted. No change agreed
			I note that reference is made here to the need for an Appropriate Assessment. It seems therefore that a similar Appropriate Assessment would be required for site SW/117 and SW/116 and SW/183. Alternatively, perhaps the need for an Assessment for SW/123 should be deleted.	An Appropriate Assessment would be needed for SW/116, SW117 and SW/183 Partial change agreed.
			Perhaps the site is better described as being located on the "eastern edge of Iwade" (rather than the northern edge).	Agreed. Change agreed.
		Hillreed Developments Ltd	The assessment made ignores the long held strategic role of this land as an important "strategic gap" which functions to prevent coalescence of Iwade and Sittingbourne. The urban extensions report acknowledges that the land's function is not part of the assessment. SW/123 should have been more rigorously examined in terms of strategic planning function.	The Urban Extensions Landscape Capacity Study sets guidelines to "ensure any further development to the south of Iwade is not extensive enough to significantly diminish the gap between Sittingbourne and Iwade". The area in question is at the pinch point between Sittingbourne and Iwade and does not affect this site, which is a more northerly extension to the east of Iwade. Notwithstanding the above, the strategic gap referred to has been largely superseded. However, the role of the site will be considered again in the context of the Core Strategy where the in-combination effects of other sites in the locality will also be examined.

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				No change agreed.
		Barratt Strategic	<p>We have an interest in this site, which Ward Homes/Barratt Strategic is promoting for residential through an option agreement with the landowner.</p> <p>We support the Council's overall conclusion that this site is a deliverable, available and achievable location for future growth at Iwade village.</p> <p>Ward Homes' extensive land control east of Iwade runs up to the A249 enables a comprehensive landscape and ecology approach to be adopted that can respond to the landscape character and provide mitigation where needed, and we are happy to confirm that we are prepared to consider public access for informal recreation.</p> <p>We note that further ecology/biodiversity advice is being sought and we would be keen to see any advice. Our own ecologists have detailed knowledge in this regard and may be able to assist.</p> <p>We agree with the Council's assumptions that post 2015 is a reasonable time for the site to be brought forward for housing.</p> <p>However, we note that the overall yield for the site is missing from the overall achievability table from the pro-forma sheet. The table should be amended to reflect the total estimated yield of 311 dwellings.</p>	<p>Noted.</p> <p>No change agreed (except yield reference).</p>
SW/158	Land rear of 33 Highfield Road, Halfway	Paul Sharpe Associates	I declare an interest in this site as I act for the landowner but not in relation to this particular site.	<p>Noted.</p> <p>No change agreed.</p>

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SW/183	Land south east of Iwade	Hillreed Developments Ltd	The assessment made ignores the long held strategic role of this land as an important “strategic gap” which functions to prevent coalescence of Iwade and Sittingbourne. The urban extensions report acknowledges that the land’s function is not part of the assessment. SW/128 should have been more rigorously examined in terms of strategic planning function.	See above. This site lies at the pinch point referred to and since the 2008-2009 submission has been reduced in size in order not to diminish the gap. Landscape enhancements are also proposed. However, the in-combination impacts of sites on gap issues will be considered as part of the LDF. No change agreed.
SW/194	Land at Cowstead Corner, Lower Road, Minster	Paul Sharpe Associates	I declare an interest in this site as I act for one of the landowners involved but not in relation to this particular site.	Noted. No change agreed
			In Step 2, reference should be made to the planned provision of a primary school and local centre at the adjacent Thistle Hill site.	Noted. Change agreed.
SW/196	Land adj Kingsborough Farm, Eastchurch Road, Minster	Paul Sharpe Associates	I acknowledge an interest in this site as I act for the landowner but not in relation to this site.	Noted. No change agreed.
			Regarding the comments in Step 2, the reference made to the Urban Extension Study’s note that the recent housing development at Kingsborough Farm impinges on the rural landscape and appears isolated perhaps omits to observe that the development is as yet by no means complete. When complete, it will indeed appear as an extension of the eastern part of Minster.	Noted. Change agreed.

SW/204	Land at Muddy Lane, Sittingbourne	Paul Sharpe Associates	I acknowledge an interest in this site as I act for the landowner and have promoted this site to the SHLAA.	Noted. No change agreed
SW/213	Sittingbourne Adult Education Centre, College Avenue	Paul Sharpe Associates	Regarding Step 5, overall achievability, there seems to be an inconsistency of approach with this site. You say that it is “assumed” that KCC intend to make replacement provision for this facility as part of Sittingbourne Town Centre Regeneration. That in itself creates significant uncertainty over the proposal. Further, there appear to be no firm intentions from KCC regarding the conversion of the existing listed building. It could, for example, be KCC’s intention to demolish the listed building and redevelop the site. Consequently, there appears to be no clear developer intentions for this site and therefore, in my view, it should not (like other sites in similar circumstances in the SHLAA) be recorded as achievable at this stage. The contribution of the site could be reviewed when the landowner’s intentions are clear.	KCC have confirmed intention to convert buildings and are committed to new facility within facility. Furthermore site details confirm conversion of the existing building. The site is phased reflecting the time required for relocation, having regard to viability issues. Partial change agreed.
SW/216	Land south of Iwade	Hillreed Developments Ltd	The sensitivity of the landscape to the south is overstated. The land here scores “moderate sensitivity”, which is the most common result for the urban fringe sites that were assessed (many urban fringe sites progressed in the SHLAA with a similar scoring grade). See Allen Pyke Landscape Consultant report, which concludes that the land has considerable capacity for expansion.	The open character of the landscape here is acknowledged in the Allen Pyke evidence; however, its conclusions are reached by the basis of simply taking a very minor crest of land far enough from Iwade to enable it to be shielded in still more distant views. The site itself is large and the ability for it to be absorbed into the countryside is limited, unless the site was considerably reduced and the land replaced with significant planting. The landscape to the south of Iwade is considered sensitive by virtue of the setting of the Listed Coleshall Farm and the

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				undeveloped landscape and views across the rural farmland to the south west of this Listed Building. No change agreed.
			<p>Site plan is out of date (in view of planning permission which has been granted). The site is within the 800m distance for public transport and surgery. There is not sufficient evidence to reject this site on the basis of the perceived wider landscape impact or; the perceived effect on the setting of the listed building.</p> <p>For a size of this site it would be possible for the setting of the listed Coleshall Farm to be safeguarded, given that the Local Planning Authority appears to accept that the strategic gap will not be compromised if structural planting accompanies development on this side of the village. Neither this point nor the perceived landscape impact (which scores the same or better to other sites which go on to progress through the SHLAA) should prevent the site from progressing to the next stage.</p> <p>It is considered that for Iwade the balancing assessment has been weighted too heavily on the landscape advice of consultants considering the urban fringe sites, while ignoring the strategic function of the east side of Iwade as an important buffer and gap from Sittingbourne.</p> <p>Exclusion from the SHLAA will prejudice prospects of the site (in terms of being a Site Allocation) and dismissing this site would be premature.</p> <p>This site will deliver a flood risk solution for the wider village by controlling flows of the Iwade stream and providing 1 in 100 year protection which cannot be</p>	<p>Reference to 900m accessibility to services, is the distance taken from a nominal centre-site position.</p> <p>See earlier comments in respect of the 'gap' issue.</p> <p>The issue of the flood issue will be addressed in the site report, but the weight to be attached to their significance is a matter for the LDF.</p> <p>Partial change agreed.</p>

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			delivered by any other direction of growth. Flood risk from the Iwade stream is not mentioned in the assessment of the Iwade sites, yet it is an important benefit which should really be acknowledged.	
SW/313	Trinity Road, Sheerness	Paul Sharpe Associates	I welcome the pragmatic approach to the assessment of these sites resulting in the conclusion that they are not currently deliverable.	Noted. The Council's own conclusion is that this site should be removed from future SHLAAs. No change agreed.
SW/314	Adj 13 New Road, Sheerness	Paul Sharpe Associates	I welcome the pragmatic approach to the assessment of these sites resulting in the conclusion that they are not currently deliverable. These sites will only be genuinely available in two extreme circumstances, ie where the owner/occupier of the small business chooses to retire or the business itself ceases to be viable. The other circumstance would be where the housing market is probably overheating, ie where the value of the site for housing is greater than that of the profits from business use. None of these circumstances appear to apply with regard to these sites and therefore I support the conclusions.	Noted. The Council's own conclusion is that this site should be removed from future SHLAAs. No change agreed.
SW/316	Borough Road, Queenborough	Paul Sharpe Associates	I welcome the pragmatic approach to the assessment of these sites resulting in the conclusion that they are not currently deliverable. These sites will only be genuinely available in two extreme circumstances, ie where the owner/occupier of the small business chooses to retire or the business itself ceases to be viable. The other circumstance would be where the housing market is probably overheating, ie where the value of the site for housing is greater than that of the profits from business use. None of these circumstances appear to apply with	Noted. The Council's own conclusion is that this site should be removed from future SHLAAs. No change agreed.

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			regard to these sites and therefore I support the conclusions.	
SW/317	Adj 13 High Street, Minster	Paul Sharpe Associates	I have to declare an interest here having previously acted for the landowner.	Noted. No change agreed.
			Whilst the owner is a local housebuilder, this site is perceived as a single house plot with very good views to the south over the Swale. However, land values would not sustain what is an expensive site to develop and, as a single plot, may not be worthy of inclusion within the SHLAA.	Noted. The Council's own conclusion is that this site should be removed from future SHLAAs. No change agreed.
SW/318	Land adj Manor Road	Paul Sharpe Associates	Similar comments to SW/025 above apply, particularly regarding delivery timing.	The Council has taken viability advice on this site which is that the site is viable within an earlier period. However, the Council considers that the site is more likely to be delivered by an RSL. Uncertainties over grant funding is considered to have a strong bearing on phasing and as such it has been placed in 11-15, when the main body of the regeneration area will have commenced. Partial change agreed.
SW/319	19 Queenborough Road, Minster	Paul Sharpe Associates	I welcome the pragmatic approach to the assessment of these sites resulting in the conclusion that they are not currently deliverable. These sites will only be genuinely available in two extreme circumstances, ie where the owner/occupier of the small business chooses to retire or the business itself ceases to be viable. The other circumstance would be where the housing market is	Noted. The Council's own conclusion is that this site should be removed from future SHLAAs. No change agreed.

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			probably overheating, ie where the value of the site for housing is greater than that of the profits from business use. None of these circumstances appear to apply with regard to these sites and therefore I support the conclusions.	
SW/320	Rose Street, Sheerness	Paul Sharpe Associates	I welcome the pragmatic approach to the assessment of these sites resulting in the conclusion that they are not currently deliverable. These sites will only be genuinely available in two extreme circumstances, ie where the owner/occupier of the small business chooses to retire or the business itself ceases to be viable. The other circumstance would be where the housing market is probably overheating, ie where the value of the site for housing is greater than that of the profits from business use. None of these circumstances appear to apply with regard to these sites and therefore I support the conclusions.	Noted. The Council's own conclusion is that this site should be removed from future SHLAAs. No change agreed.
SW/321	Southsea Avenue, Minster	Paul Sharpe Associates	I have to declare an interest here having previously acted for the landowner.	Noted. No change agreed.
			There is another material factor not referred to in the text, i.e. that access would be taken from private unmade and unadopted roads. Also, the Council has been entirely unrealistic in attempts by the landowner to purchase the Council's interest.	Reference to un-made roads and negotiations will be referred. Change agreed.
			In my view, only at the very top of the housing market is this site likely to come forward for development.	Noted, but the site has not progressed beyond step 3. No change agreed.

Site ref	Site address	Name	Comment	Response
SW/325	Plover Road, Thistle Hill, Minster	Paul Sharpe Associates	I declare an interest in this site as I act for the developer in relation to part. Comments regarding the criteria or Local Plan Policy H9 are noted and indeed it is this policy alone that has prevented the site from being developed before now.	Noted. No change agreed.
SW/328	Rear of Shelduck Close, Iwade	Paul Sharpe Associates	I declare an interest in this site as I act for the landowner but not in relation to this site.	Noted. No change agreed.
SW/333	West Street	Paul Sharpe Associates	Again, insufficient account has been taken of ground contamination in this area. It was because of the extreme nature of ground contamination within this site and the Klondyke site that they were not included within the Swale Gateway development proposals in 1994. Agree with the conclusion on delivery timing but again subject to the caveat that even this is achievable only with comprehensive development of the various SHLAA sites at the head of Queenborough Creek.	Further emphasis will be given to the contamination issues. CBRE consider the site to be viable within the SHLAA period, however, the site is phased at the end of SHLAA period with potentially an element extending beyond the SHLAA period. Change agreed. See earlier response in respect of comprehensive development.
SW/335	Creekside	Paul Sharpe Associates	In the last paragraph, the effect of ground contamination is in my view underplayed. I would accept that this is not a matter affecting "suitability" but this is only because the principle is now established in the Development Plan. Clearly contamination and the cost thereof will affect availability, viability and overall achievability. Step 5 - overall achievability In all the circumstances, with development of the site from south to north with the Klondyke site remaining and uncertainty over its timing and development, likewise regarding Sites SW/005 and SW/333 and uncertainties	Advice from the HCA is that most of the site will be delivered during the SHLAA period, although flexibility has been introduced into the phasing and overall numbers to address uncertainties over precise delivery and yields. Phasing has been provided by HCA based on their strategy for bring the site forward in 3 phases. However, the Klondyke site is almost entirely phased beyond the SHLAA period. Partial change agreed.

Site ref	Site address	Name	Comment	Response
			<p>surrounding the marina mean, in my view, that completions by 2015-16 are optimistic.</p> <p>CBRE project a recovery in the housing market for the Sittingbourne area as post 2018. Then, with certainty, any substantial recovery on the Island will be several years behind that. Bearing in mind also the lack of a driving force such as SEEDA this confirms, in my view, the over optimistic delivery timings currently projected.</p>	
SW/337	Crown Quay Lane	Barratt Strategic	<p>Whilst the SHLAA analysis acknowledges a need to reduce the proportion of apartments within this site, it is unclear what the split between different property types has been assumed within the Council's revised assumptions. 35/65 was assumed for Queenborough and Rushenden, has a similar assumption been made here and how would this influence dwelling unit estimates? The juxtaposition of the metal recycling facility (SW/388) could impact negatively on land values.</p> <p>Housing delivery at this site is dependent on the completion of the NRR, A2 and railway link.</p>	<p>The reduction in site density is intended to allow for a potential reduction in the number of flats. It should be noted that viability advice has assumed 60:40 split in favour of houses, with the full mix of flats and housing under each. An amendment will be made to allow for an element of phasing extending beyond the SHLAA period.</p> <p>Issues relating to the metal recycling facility and transport infrastructure are already referred to in the site report.</p> <p>Partial change agreed.</p>
SW/338	Eurolink Way	Barratt Strategic	<p>Its retention could impact negatively on neighbouring land values affecting viability of the scheme in the medium term.</p>	<p>No SHLAA yield is carried forward for this site.</p> <p>No change agreed.</p>
SW/340	High Street/St Michael's Road	Barratt Strategic	<p>No comment</p>	<p>Noted.</p> <p>No change agreed.</p>

Site ref	Site address	Name	Comment	Response
SW/341	The Butts, St Michael's Road	Barratt Strategic	No comment	Noted No change agreed.
SW/342	Swale House and environs	Barratt Strategic	Assumptions regarding delivery timeframe seems reasonable however it is unclear what assumptions have been made regarding the proportion of flats would be part of any scheme here – accepting that a town centre site could accommodate higher density living.	Work on viability by CBRE has assumed a 60:40 split for flats and houses. This includes a breakdown of 1, 2 and 3 bedroom flats as well as 2 and 3 bedroom houses. No change agreed.
SW/344	Sainsbury's, Roman Square	Barratt Strategic	SPD assumptions on apartment yield for this site seems too high	Noted, however, no SHLAA yield is carried forward. No change agreed.
SW/345	Central Avenue	Barratt Strategic	No comment	Noted. No change agreed.
SW/346	Albany Road car park	Barratt Strategic	No comment	Noted. No change agreed.
SW/347	Fountain Street	Paul Sharpe Associates	Bearing in mind the location of this site and the proposed form of development, I find the conclusion on deliverability to be hugely optimistic	Viability testing by CBRE has found the site to be viable early in the SHLAA period; however, a later phasing is adopted reflecting the need for other elements of the regeneration project to be in place. However, this site will still represent the earliest phase of town centre housing regeneration. Partial change agreed.

Site ref	Site address	Name	Comment	Response
		Barratt Strategic	This site which is bisected by busy roads and is proposed for a multi-storey car park is might not be a suitable location for new residential development. High quality residential development – which this site demands – may not be deliverable before the property market has been restored, which CBRE identify post 2018: the SHLAA estimation for dwellings on this site by 2017 may be too optimistic, although we understand that it would coincide with the estimated delivery of new car parking facilities for the town centre.	See above response. Partial change agreed.
SW/348	Land around Focus DIY	Barratt Strategic	The proportion of flats that the SHLAA assumes for this site could be too optimistic. We agree however that highway improvements and changes to car parking provision are essential features that must be addressed before development can occur here.	CBRE have assumed a 60:40 split in favour of housing and phasing has been made as per this advice. However, it is acknowledged that some aspects of the proposals may be beyond the SHLAA period. Partial change agreed.
SW/349	r/o 71-121 High Street	Barratt Strategic	SPD proposal for creating an east-west link seems at odds with the Spirit of Sittingbourne scheme, which is not picked up by the analysis.	Link is referred to in the analysis. A link is proposed within the ‘Spirit’ proposals. No change agreed.
SW/351	Gas Road	Paul Sharpe Associates	Here again is an example of the SPD assuming that development is acceptable despite flood risk and that the development will be for 3 storey apartments. Reference is made to the Employment Land Review in Step 1 and Step 2 but of course the Employment Land Review assesses land in a theoretical and “pure” point of view. Every urban area needs a location suitable for cheap employment purposes generally out of sight and	See earlier comments on flood risk. No change agreed. The Council in part agrees with the views expressed. In reality there is an in-combination of effects here and there are arguments to suggest the sites removal from the SHLAA process at steps 1, 2 and 3. However, whilst the sites employment

Site ref	Site address	Name	Comment	Response
			out of mind, eg where the Enforcement Officer is able to direct bad neighbour uses, confident that they can be accommodated in such locations. This is one of those sites (as is the Klondyke Estate at Queenborough). It is not possible to continue to allocate such sites for redevelopment without providing alternative locations for bad neighbour, low value employment uses. In addition, the vehicular access to the Gas Road site beneath the light railway condemns this location to be, in my view, particularly unsuitable residential use. Consequently, whilst I agree with the conclusion in Step 3, I believe this site is inherently unsuitable for housing.	potential will be emphasised in step 1, on balance is dismissal at step 3 is maintained. Partial change agreed.
SW/353	Standard Quay, Faversham	Paul Sharpe Associates	I have no difficulty with the assessments and conclusions with regard to these sites. However, in response to the rhetorical question at each “step” of the process, several of the answers are incorrect.	Noted. Change agreed.
			Also, at Step 1, in several cases the sites have “been tentatively allowed to progress to the next step”. It seems that the policy constraint has been removed and therefore the progression surely is not “tentative”.	Noted. Change agreed.
SW/354	New Creek Road, Faversham	Paul Sharpe Associates	I have no difficulty with the assessments and conclusions with regard to these sites. However, in response to the rhetorical question at each “step” of the process, several of the answers are incorrect.	Noted. Change agreed.
			Also, at Step 1, in several cases the sites have “been tentatively allowed to progress to the next step”. It seems that the policy constraint has been removed and therefore	Noted. Change agreed.

Site ref	Site address	Name	Comment	Response
			the progression surely is not “tentative”.	
SW/356	SECOS Ltd, Standard Quay, Faversham	Paul Sharpe Associates	I have no difficulty with the assessments and conclusions with regard to these sites. However, in response to the rhetorical question at each “step” of the process, several of the answers are incorrect.	Noted. Change agreed.
			Also, at Step 1, in several cases the sites have “been tentatively allowed to progress to the next step”. It seems that the policy constraint has been removed and therefore the progression surely is not “tentative”.	Noted. Change agreed.
SW/525	Local Centre, Sittingbourne	Paul Sharpe Associates	I believe the total capacity for this site is 170 units. Of those, 27 are complete (Marshgate); 58 have detailed approval but have not been commenced (PFP) and detailed approval has been given for the balance of the site to Abbey Homes (number unknown). Currently the Abbey Homes part of the site is under construction.	The Capacity is recorded as per the Council’s monitoring records. It is probable that the other dwellings are being counted against another permission. No change agreed.
	Queenborough & Rushenden Masterplan	Paul Sharpe Associates	With regard to the future of the marina and dwelling mix, there seems to me to be some confused thinking here. The marina will be the main attraction in generating values and indeed you suggest that the premium waterfront nature would be the main factor supporting a substantial proportion of flats. However, without a marina the waterfront nature of the development becomes very ordinary and I question whether, without a marina, the sort of high quality, high value development perceived by the Masterplan will be capable of delivery. Also under Step 3, reference is made to the fact that development will proceed from south to north, ie with the	It is acknowledged that the marina was/is seen as the means to generate values. However, the report seeks to acknowledge that at the present time there is some doubt as to its delivery/timing. It should be noted that the report acknowledges that it is too early to judge. In the event that a marina is not delivered, the Council believes that this will simply change the nature of the development. Whilst this may impact upon the type of masterplan that is brought forward, it does

Site ref	Site address	Name	Comment	Response
			<p>development of the Klondyke area as a latter part of the development. However, development of that area must set the scene for the Creekside and the fact that the area is in separate ownership and with such severe contamination problems this uncertainty, together with the uncertainty of the marina and adjacent unsightly sites in yet another ownership, this is unlikely to encourage sales on the southern part of the development area.</p> <p>Overall, I would be inclined to set completions back by at least one 5 year period.</p>	<p>not affect the principle of housing coming forward. That said, it would have a bearing potentially on its timing, however, slippage in delivery (compared with previous estimates) is already reflected in the report.</p> <p>The sequence of the development reflects the approved masterplan and whilst development of the Klondyke site will set the scene for the creekside, it is not considered necessary in terms of achieving development in the wider area. Indeed completion of a more straightforward area of the masterplan (i.e. SW/335) might be seen as a necessary catalyst to the development of the rest of the area.</p> <p>The HCA have provided phasing and yields for this area based on the actions that they are making to bring the site forward. This has resulted in both changes to the phasing and total yield which will, in turn, introduce flexibility into such issues as viability and total yields (the flatted accommodation issue), with a significant number of dwellings falling outside the SHLAA period.</p> <p>The HCA have provided phasing and yields for this area based on the actions that they are making to bring the site forward. This has resulted in both changes to the phasing and total yield which will, in turn, introduce flexibility into such issues as viability and total yields (the flatted accommodation issue), with a significant number of</p>

Site ref	Site address	Name	Comment	Response
				<p> dwellings falling outside the SHLAA period.</p> <p>Through this process it is considered that risks of the Council over-relying upon over optimistic yields should be reduced.</p> <p>Various changes agreed.</p>
		Barratt Strategic	Market housing identified in figure 3 adds up to 1,480 not 1,500 dwellings.	<p>This is an error from the illustrative figure contained in the adopted masterplan. This does not affect the phasing used in the SHLAA.</p> <p>No change agreed.</p>
			The SHLAA findings identify the market change for flatted accommodation in the Borough – reflecting a drop in demand for flats. However, it is not clear from the SHLAA material how the revised housing figure following a drop of 150 units from total yield, has been calculated.	<p>The HCA have provided phasing and yields for this area based on the actions that they are making to bring the site forward. This has resulted in both changes to the phasing and total yield which will, in turn, introduce flexibility into such issues as viability and total yields (the flatted accommodation issue), with a significant number of dwellings falling outside the SHLAA period.</p> <p>Through this process it is considered that risks of the Council over-relying upon over optimistic yields should be reduced.</p> <p>Various changes agreed.</p>
			We feel that the housing projections for this regeneration area could be revised to reflect the CBRE findings more closely – estimating housing starts post 2018. Especially since the winding up of SEEDA and no identifiable future developers on the future delivery of the masterplan could	<p>The HCA have provided phasing and yields for this area based on the actions that they are making to bring the site forward. This has resulted in both changes to the phasing and total yield which will, in turn, introduce</p>

Site ref	Site address	Name	Comment	Response
			<p>also have implications on the delivery time.</p> <p>Renegotiating the contributions strategy between the Council and purchasers of SEEDA land that will influence how and when development parcels of the masterplan are triggered, will likely be linked to the economic outlook and projected land values. It is reasonable to assume again therefore that development prospects will pick up for the period beginning post 2018.</p>	<p>flexibility into such issues as viability and total yields (the flatted accommodation issue), with a significant number of dwellings falling outside the SHLAA period.</p> <p>Through this process it is considered that risks of the Council over-relying upon over optimistic yields should be reduced.</p> <p>Various changes agreed.</p>
	<p>Sittingbourne Town Centre & Milton Creek – overview report</p>	<p>Paul Sharpe Associates</p>	<p>Two general points. Firstly, in the box in para 12, the difference between “landowners yield” of only 137 units, the “Local Plan yield” of 1000 units and the “SPD yield” of 2984 units is striking. Generally, it is developers who are bullish and over optimistic about the development potential of their sites and therefore this degree of disparity between landowners/developers and the Council is of some concern.</p> <p>Secondly, bearing in mind the Supplementary Planning Document’s reliance on apartments as a development type within the area (particularly within the Milton Creek area for flood risk reasons) bearing in mind the advice that the Council will have received from CBRE, this issue in particular is probably worthy of specific general comment. For example, is it CBRE’s view that the current overhang of apartment development will have been consumed by 2018 or is there a need to rebalance/adjust the projected housing mix within the SPD area with family-type housing?</p> <p>Elsewhere, flood risk is a direct determinant of dwelling type and the need for a means of escape on foot without risk is extremely difficult to achieve. Statements such as</p>	<p>To clarify, this is not an example of any disparity, merely which landowners have chosen not to specify the number of units that are expected to be delivered.</p> <p>No change agreed.</p> <p>The SPDs ‘reliance’ on flats is questioned in the report and yields adjusted downwards accordingly, especially in respect of land at Crown Quay Lane and the Milton Pipes site. However, it is accepted that this should have been acknowledged within the main overview report. The process to allow for any such reduction has been density led as it is difficult to make assumptions about the heights of development etc. It should be noted that CBRE used a 60:40 split in favour of housing to reflect this issue. It is considered that the yields reached within the reports should now adequately reflect the issue of flatted development.</p>

Site ref	Site address	Name	Comment	Response
			<p>“the Environment Agency has not objected to the Master Plan and there is considered to be a strong likelihood that the exceptions test of PPS25 would be passed” does not, in my view, provide an appropriate level of confidence for the SHLAA. This statement includes two assumptions and, bearing in mind the critical nature of the context, the EA should be asked by the Council to positively indicate their views on the proposals in terms of flood risk.</p> <p>Clearly the town centre and Milton Creek SPD regeneration area is a complex one and there will always be degrees of uncertainty. However, bearing in mind the great number of admitted uncertainties and assumptions included in this report, whilst recognising the reduction in yield from 2519 to 947 units, realistically, development yields should be set back to begin in the 11-15 year period.</p>	<p>Partial change agreed.</p> <p>The Environment Agency was fully involved in the SPD process and this has not given rise to in principle objections to the site as part of that or the SHLAA process. However, further text will be provided.</p> <p>Partial change agreed.</p> <p>The vast majority of development is phased in the 16-20 period and beyond in response to these comments and viability advice.</p> <p>Partial change agreed.</p> <p>In respect of issues concerning flatted development, the density multiplier yields from these sites have reflected an envisaged reduction in yield arising from reduced flat provision. Whilst acknowledging the comments on phasing, the Council has adopted a more cautious approach in accordance with viability advice.</p> <p>In the case of the main creekside area (SW/337), a density of 60dph is applied, but this assumes reasonably high density housing, as opposed to flatted accommodation.</p> <p>No change agreed.</p>
		Barrett Strategic	The SHLAA analysis rightly identifies the constraints as well as the opportunities that exist for this broad and complex master planning area. Whilst we have always	Assumptions about flatted accommodation (i.e. potential oversupply), have been reflected within the reduced densities

Site ref	Site address	Name	Comment	Response
			<p>supported plans for regenerating the town centre, we agree with the SHLAA findings that housing numbers will need to be reduced. However, it is unclear from the discussion whether the same assumptions made for other regeneration areas in Swale regarding the split between housing and apartments has been applied for the town centre and Milton Creek regeneration area. It is our view that such assumptions should be calculated within the final SHLAA housing figure because whilst we accept that town centre sites are more likely to be able to support flatted accommodation compared with out of centre locations, work by CBRE and findings from the SHMA indicate viability issues and a demand for more family housing.</p> <p>It is important that the urban environment of Sittingbourne is protected just as much as the rural environment since Sittingbourne residents will also place a great priority on space, peace and quiet and traffic free areas compared with its opposite: high density 'town cramming'.</p> <p>We agree with the SHLAA analysis that delays are likely on delivering the town centre part of the scheme due to a fragmented landownership, multiple tenancy and lease agreements, and uncertainties with public sector financing and developer interest. The potential implications of further slippages with the Northern Relief Road and the depressed property market on the timeframe for delivering the regeneration scheme seem reasonable at this stage. However, there is a likelihood that the Town Centre sites could be delivered more slowly over the course of the planned period compared with the SHLAA estimations: the delivery of dwelling units could be less than the 80-100 units during the 16-20 years, which could push the</p>	<p>assumed and where specific splits between housing and flats have been assumed for viability testing, these will be referred to in site reports.</p> <p>Partial change agreed.</p> <p>Phasing has been made having regard to viability advice. This has placed the bulk of delivery in the post 16-20 year period, which would additionally align with transport infrastructure assumptions. However, with most dwellings proposed for the Crown Quay Lane site, it has been assumed that the involvement of Tesco/Spenhill and the delivery of higher value uses will enable a marginally earlier commencement of development leading to delivery in the plan period. Higher annualised delivery rates are assumed because there is considered to be more than one developer involved, due to land to the east of Crown Quay Lane.</p> <p>In respect of office assumptions, these are unlikely to be taken forward within the main Crown Quay elements of the project, but may be secured as part of other regeneration sites in due course.</p> <p>Partial change agreed.</p>

Site ref	Site address	Name	Comment	Response
			<p>completion of the site outside the 2031 timeframe. A 50-60 unit delivery rate maybe more appropriate during this period.</p> <p>The SHLAA also correctly notes the ELR recommendation that a proportion of office development be provided within the town centre. It is not clear from the SHLAA however how this aspect might be taken forward and affects final housing capacity.</p> <p>Regarding table 2, we believe that residential development at Milton Creek should be moved to phase 3 to reflect the more detailed assumptions made in the later analysis for SW/337. This would also align more reasonably with assumptions made regarding the likelihood of when the Northern Relief Road will be completed.</p>	
	Sheerness Port	Barratt Strategic	<p>The SHLAA identifies significant challenges in terms of reclamation of land, potential adverse impacts on a marine SPA and local biodiversity, significant transportation and access issues and flood risk that currently justify its rejection at Step 2.</p> <p>There are also issues regarding the type of living environment that this proposal seeks to achieve. The potentially unhappy juxtaposition of new housing and an enhanced working port is an issue the SHLAA is correct in identifying. It would also be important to investigate further as part of the next SHLAA or further studies to inform the Preferred Options Core Strategy the implications, if any, that the Vestas proposal will have on this site coming forward as a regeneration scheme.</p> <p>It is not clear from the SHLAA how many of the 2,390</p>	<p>Noted. The sites have not proceeded on the basis of concerns.</p> <p>No change agreed.</p>

Site ref	Site address	Name	Comment	Response
			<p> dwellings would be reserved for apartments and housing. The assumptions made for other SHLAA sites, which accommodate a fall in demand for flats, have not been applied here but would likely cause a drop in the site's capacity.</p> <p> Given the complexities that would arise in looking to develop these sites, and the potential constraints and associated costs, we do not feel these 1,800 dwellings as part of zone 1 are truly deliverable in the period of the SHLAA.</p>	
401	Former Paper Mill, Mill Way, Sittingbourne	CPRE	<p> It is disappointing that the residential yield from this town centre site cannot be greater and that retail is being considered here given the proposals in the Local Plan for large scale retail development to expand the town centre. We consider that at least for the purposes of the SHLAA the site should be considered solely for residential.</p> <p> The phasing figures in the table do not add up to the 150 total.</p>	<p> In the light of the Morrisons planning application for mixed use development it is not considered that this site is available in its entirety for residential development.</p> <p> No change agreed.</p> <p> Noted.</p> <p> Change agreed.</p>
		Paul Sharpe Associates	<p> I must first register two interests, firstly that I act for Tesco elsewhere (not in Sittingbourne) and for E H Nicholls, owners of the Sittingbourne Retail Park.</p>	<p> Noted.</p> <p> No change agreed.</p>
			<p> Firstly, in the site description - there are no "superstores" within the retail park.</p>	<p> Noted. However, there are large stores on the retail park – Homebase, Dunelm Mill, Pets at Home and so on.</p> <p> Change agreed.</p>
			<p> In step 2, I think there are a number of comments that are perhaps inappropriate, e.g. that it seems likely that the development will be allowed to proceed before the</p>	<p> These are matters that are to be resolved as part of the planning applications being considered in the area. These are at an</p>

Site ref	Site address	Name	Comment	Response
			<p>provision of an appropriate Transport Assessment and that planning permission is likely to be granted for a food store etc.</p> <p>Notwithstanding the Council's partnership with the developer, the proposal is clearly contrary to national and local retail policies. The site is not located within the defined town centre; it is questionable whether the site would satisfy the sequential test and the proposal is in conflict with adopted retail policies for expansion of the town centre. It seems unlikely therefore that planning permission can be granted in the short term.</p>	<p>advanced stage and not thought at this stage to be constraints to development.</p> <p>By the time the SHLAA is published planning permission is likely to have been granted.</p> <p>No change agreed.</p>
			<p>In step 5, the suggestion is made that development of this site will be led by the retail element. The viability and timing of the scheme must therefore be questionable. (The annual delivery appears to sum to 140 rather than 150.)</p>	<p>Phasing has been undertaken in accordance with viability advice and that understood to be the developer's intentions.</p> <p>Partial change agreed.</p>
		CPRE	<p>Agree with the assessment. The retention of educational use would be the most desirable option here.</p>	<p>Noted.</p> <p>No change agreed.</p>
402	Borden Grammar School, Avenue of Remembrance, Sittingbourne	CPRE	<p>Agree with the assessment.</p>	<p>Noted.</p> <p>No change agreed.</p>
403	Abbey School, London Road, Faversham	Paul Sharpe Associates	<p>I note your approach vis a vis the RSS. However, I think it likely that the RSS will remain extant until Core Strategy inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.</p>	<p>Whilst the RSS remains part of the Development Plan until legislation is passed, its intended revocation is a material consideration and was a response to critics in the partnership over the SHLAA methodology's treatment of the RSS. It</p>

Site ref	Site address	Name	Comment	Response
				seems likely, whether or not the RSS is still in place by the time of the Core Strategy examination that it will not be of significant importance in policy terms. No change agreed.
		CPRE	Agree with the assessment, as the site is unsuitable due to its location in flood risk zone 3.	Noted. No change agreed.
404	Land at Queenborough Road, Sheppey	Environment Agency	We agree with the assessment	Noted. No change agreed.
		Hillreed Homes	Struck by the number of sites that were rejected in this report on the grounds that development <u>would erode important corridors or approaches to, or between, settlements</u> . These comments do not seem to be consistent with the approach being taken at Iwade.	This site did not progress beyond Step 2 primarily because it is in a flood risk zone and was not considered to be sustainably located. In respect of the 'gap' issue, no such issues have been raised in respect of land to the south west of Iwade. In respect of the other sites at Iwade, the Council's landscape study has addressed the issue. In respect of sites to the east of the village, it is clear that the study concludes that it does not impact upon the gap, whilst in respect of land to the south, it is judged acceptable, subject to identified limits. Notwithstanding the conclusions reached by the SHLAA, it will be for the Council, via the Core Strategy, to make a judgement in respect of in-combination effects of various sites and their impacts upon the function of

Site ref	Site address	Name	Comment	Response
				<p>the gap. In this respect its 'strategic' role can only be viewed in the local context (the strategic gap having been superseded). This issue would have to be taken into account alongside any potential overriding need for housing and the availability of other sites.</p> <p>No change agreed.</p>
405	Land at Minster Academy, Admiral Walk, Minster	CBRE	Disagree with the assessment. This site should not progress beyond Step 2. It is explained that surface water drainage has been a limiting constraint in the past. However, on the assumption that the site promoter will have control over this matter the site progresses to Step 3. The site should not progress on this assumption. Even if it does, it should fall at Step 4 because there is no evidence to suggest that 20 dwellings would enable the drainage constraint to be overcome, so there must be doubts about its achievability	<p>On the basis that Southern Water has previously indicated that a connection could be made to the public sewer, provided that flow was attenuated, this site has progressed beyond Step 2. Such matters would normally be subject to appropriate planning conditions.</p> <p>No change agreed.</p>
407	Land off High Street, Newington	Paul Sharpe Associates	I need to declare an interest here as I act for the landowner regarding this site.	<p>Noted.</p> <p>No change agreed.</p>
		CBRE	Agree with the assessment. The air quality management issue is a serious limiting constraint to any development at Newington.	<p>Noted.</p> <p>No change agreed.</p>
408	Land rear of 37-91 The Street, Bapchild	Paul Sharpe Associates	<p>I need to declare an interest here as I act for the landowner but not in relation to this site.</p> <p>Bearing in mind the configuration of the site I question its ability to accommodate development other than a single</p>	<p>Noted.</p> <p>No change agreed.</p>

Site ref	Site address	Name	Comment	Response
			dwelling.	
410	Land adjoining School Lane, Bapchild	CPRE	Agree with the assessment. This is an unsuitable and extremely intrusive site.	Noted. No change agreed.
		Hillreed Homes	Struck by the number of sites that were rejected in this report on the grounds that development <u>would erode important corridors or approaches to, or between, settlements.</u> These comments do not seem to be consistent with the approach being taken at Iwade	This site did not progress beyond Step 2 for three reasons. It was not considered to be sustainably located; access issues and landscape impact. No change agreed.
411	Land adjoining School Lane, Bapchild	CPRE	Agree with the assessment. This is an unsuitable and extremely intrusive site – even more so than site SW/410.	Noted. No change agreed.
		Hillreed Homes	Struck by the number of sites that were rejected in this report on the grounds that development <u>would erode important corridors or approaches to, or between, settlements.</u> These comments do not seem to be consistent with the approach being taken at Iwade	This site did not progress beyond Step 2 for three reasons. It was not considered to be sustainably located; access issues and landscape impact. No change agreed.
412	Bapchild Fruit Stall, Fox Hill, Bapchild	CPRE	Agree with the assessment. The point about linear development and the joining of Sittingbourne and Bapchild is particularly important given the Stones Farm site opposite.	Noted. No change agreed.
413	Land between Brogdale Road and Ashford Road, Perry Court, London	CPRE	Disagree with the assessment. This site is not an 'edge of town' site, as it is clearly detached from the existing defined settlement boundary in the current Local Plan. It should, therefore, have fallen at Step 0.	The 2008-2009 Partnership rejected consideration of a similar submission at this site on the same grounds. It has been reconsidered by virtue of the identified need in Faversham for 5ha of employment land of which this is one of several sites

Site ref	Site address	Name	Comment	Response
	Road, Faversham			<p>which may have potential and which may require an element of enabling housing. The Council also takes the view that the only reason it fails to adjoin the built up area boundary is the presence of the Abbey School. In its view, the site forms a potential extension to that area.</p> <p>No change agreed.</p>
		Paul Sharpe Associates	I note your approach vis a vis the RSS. However, I think it likely that the RSS will remain extant until Core Strategy inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.	<p>Whilst the RSS remains part of the Development Plan until legislation is passed, its intended revocation is a material consideration and was a response to critics in the partnership over the SHLAA methodology's treatment of the RSS. It seems likely, whether or not the RSS is still in place by the time of the Core Strategy examination that it will not be of significant importance in policy terms.</p> <p>No change agreed.</p>
415	Land off Colonels Lane, Boughton	CPRE	Generally agree with the assessment, but consider that more regard needs to be given to its suitability at Step 2 given the poor living environment that will result due to its very close proximity to the busy A2. If this does not rule it out at Step 2, then it should only be considered as a suitable site through the LDF process if there are no other more suitable sites available.	<p>Issues relating to road traffic noise have been flagged up. The final SHLAA yield (being less than the density multiplier yield) takes into account the fact that parts of the site may need to be safeguarded from development in the interests of future residential amenity.</p> <p>No change agreed.</p>
417	Land south of Colonels Lane,	CPRE	Generally agree with the assessment, but consider that more regard needs to be given to its suitability at Step 2	<p>Issues relating to road traffic noise have been flagged up. The final SHLAA yield</p>

Site ref	Site address	Name	Comment	Response
	Boughton		given the poor living environment that will result due to its very close proximity to the busy A2. If this does not rule it out at Step 2, then it should only be considered as a suitable site through the LDF process if there are no other more suitable sites available.	(being less than the density multiplier yield) takes into account the fact that parts of the site may need to be safeguarded from development in the interests of future residential amenity. There has been also other development in the locality that has been located without harm to residential amenity. No change agreed.
418	Land adjoining 60 Ruins Barn Road, Sittingbourne	CPRE	Agree with the assessment.	Noted. No change agreed.
420	Land adjoining Mayfield, London road, Teynham	CPRE	Disagree with the assessment. The acceptance of this site seems to be on the basis of the acceptance of the larger adjoining site, and assumptions about it are made in this context. The two sites, though, are not promoted as linked proposals so it should be considered as a 'stand alone' site. Therefore, for the reasons stated, it is not a suitable site and should not progress beyond Step 2.	It is anticipated that adjoining sites would enjoy a degree of linkage, despite their separate ownerships. Sufficient caveats have been built into this particular assessment indicating that as a stand alone site it would not be a suitable site for development. No change agreed.
421	Land adjoining Queenborough Road and Sunnyfields Drive, Minster	CPRE	Agree with the assessment. Flood risk and visual prominence are major constraints that make this site unsuitable.	Noted. No change agreed.
		Environment Agency	We agree with the assessment	Noted. No change agreed.

Site ref	Site address	Name	Comment	Response
		Hillreed Homes	Struck by the number of sites that were rejected in this report on the grounds that development <u>would erode important corridors or approaches to, or between, settlements.</u> These comments do not seem to be consistent with the approach being taken at Iwade	This site did not progress beyond Step 2 primarily because it was not considered to be sustainably located and to reflect concerns about potential flooding. No change proposed.
424-428	Swan Quay, Faversham	CPRE	It is agreed in principle that there may be some potential from these sites for some very limited residential development, and therefore it is correct to acknowledge this in the assessment. However, residential development here should very much be seen as supporting other objectives for the creekside and that the consideration of the sites in detail is a matter for the creekside DPD. Therefore, in the SHLAA it is important to stress that the potential yield is an indicative figure, and is no acknowledgement that the level of residential development included in the table will in fact be appropriate	Noted. This matter is discussed in Step 4 and a matter for the proposed Neighbourhood Plan. No change agreed.
		Environment Agency	I can confirm that we have agreed the flood zone 3a(i) approach for the Faversham Creek sites as outlined in this assessment. Please note that the exception test will still need to be demonstrated by a site specific FRA in each case.	Noted. No change agreed.
		Paul Sharpe Associates	Whilst not knowing this site particularly well, clearly the existing commercial use is not viable. I question therefore whether 960sqm of B1 floorspace might be too large and likely to conflict with its attractiveness and potential residential use.	The eventual housing/employment split will be a matter from the Faversham Creekside DPD (and input at that time from CBRE). No change agreed.
422	Land at Ufton	CPRE	Agree with the assessment.	Noted. However, it is considered that the

Site ref	Site address	Name	Comment	Response
	Court Farm, Sittingbourne			potential of the site should be re-examined in the event of a need for further housing numbers. No change agreed.
		Hillreed Homes	Struck by the number of sites that were rejected in this report on the grounds that development <u>would erode important corridors or approaches to, or between, settlements.</u> These comments do not seem to be consistent with the approach being taken at Iwade	This site did not progress beyond step 2 because of sustainability issues and the impact on the narrow gap between Borden and Sittingbourne. It did not solely relate to gap issues. No change agreed.
429	Sittingbourne Community College, Swanstree Avenue, Sittingbourne	CPRE	Agree with the assessment.	Noted. No change agreed.
			In Step 1 'yes' should be changed to 'no' in response to the question 'should site progress to Step 2'.	Noted. Change agreed.
430	Abbey Farm, Abbeyfields, Faversham	CBRE	Agree with the assessment.	Noted. No change agreed.
		Paul Sharpe Associates	I need to declare an interest here as I act for the landowner but not in relation to these two sites.	Noted. No change agreed.
			I note your approach vis a vis the RSS. However, I think it likely that the RSS will remain extant until Core Strategy	Whilst the RSS remains part of the Development Plan until legislation is

Site ref	Site address	Name	Comment	Response
			inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.	passed, its intended revocation is a material consideration and was a response to critics in the partnership over the SHLAA methodology's treatment of the RSS. It seems likely, whether or not the RSS is still in place by the time of the Core Strategy examination that it will not be of significant importance in policy terms. No change agreed.
431	Abbey Farm, Abbeyfields, Faversham	CBRE	Agree with the assessment.	Noted. No change agreed.
		Paul Sharpe Associates	I need to declare an interest here as I act for the landowner but not in relation to these two sites.	Noted. No change agreed.
			I note your approach vis a vis the RSS. However, I think it likely that the RSS will remain extant until Core Strategy inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.	See comments on same issue above. No change agreed.
		Environment Agency	This site is partially in flood zone 3, therefore the site should be arranged sequentially with the least vulnerable uses (such as open space) located in the flood risk areas. We note however that for ecological and landscape reasons this site is considered unsuitable by Swale BC	Noted. No change agreed.
433	Land adjoining A2/Western Link, Ospringe	CPRE	Agree with the assessment. However, additionally in Step 2 it should be acknowledged that there are air quality issues along the A2 at Ospringe and that an Air Quality Management Area is in the process of being declared.	Noted, although this would need to be subject to further assessment as it may not be an absolute constraint to development.

Site ref	Site address	Name	Comment	Response
			This will be a major constraint to any development that will add further traffic to the A2 at Ospringe, and should be so acknowledged.	Partial change agreed.
		Paul Sharpe Associates	I note your approach vis a vis the RSS. However, I think it likely that the RSS will remain extant until Core Strategy inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.	See comments on same issue above. No change agreed.
		Hillreed Homes	Struck by the number of sites that were rejected in this report on the grounds that development <u>would erode important corridors or approaches to, or between, settlements.</u> These comments do not seem to be consistent with the approach being taken at Iwade	This site did not progress beyond step 2 primarily because of sustainability, access (and air quality issues). No change agreed.
434	The rear of Queens Head PH, 111 The Street, Boughton	CPRE	Disagree with the assessment. It is difficult to see how this site could be satisfactorily accessed given that this will be via the pub car park. Therefore, unless there is clear evidence that the proposed access arrangement is achievable the site should not progress beyond Step 4. In any event, it seems likely that the site would be too small for allocation in the LDF.	At 0.15ha (with a density multiplier of 8) the SHLAA methodology allows this site to be considered. It is agreed that this site should be re-assessed with regard to highway factors/site suitability. This has led to the site not progressing beyond step 2. Change agreed.
		Paul Sharpe Associates	It appears from the description that vehicular access to this site would be obtained from the pub car park. In my view this would be an unacceptable form of development and as such should not be included within the SHLAA.	It is agreed that this site should be re-assessed with regard to highway factors/site suitability. This has led to the site not progressing beyond step 2. Change agreed.
435	Queen Court	CPRE	Agree with the assessment. However, additionally in Step	Noted.

Site ref	Site address	Name	Comment	Response
	Farm, Water Lane, Ospringe		2 it should be acknowledged that there are air quality issues along the A2 at Ospringe and that an Air Quality Management Area is in the process of being declared. This will be a major constraint to any development that will add further traffic to the A2 at Ospringe, and should be so acknowledged.	Change agreed.
		Paul Sharpe Associates	I note your approach vis a vis the RSS. However, I think it likely that the RSS will remain extant until Core Strategy inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.	See comments on same issue above. No change agreed.
436	Land west of Wises Lane, Sittingbourne	CPRE	From the maps it seems that these two sites are in fact the same site, though they are described as 'west' and 'east' of Wises Lane respectively. It is difficult therefore to offer any specific comment without knowing more precisely the land involved in each. However, in general we would agree with the assessment presented and that the sites should not proceed beyond Step 2.	The correct site plan has been attached to this report. Change agreed.
		Paul Sharpe Associates	It is not at all clear from the attached plans which parts of the site are described as "west" and "east" of Wises Lane.	The correct site plan has been attached to this report. Change agreed.
		Hillreed Homes	Struck by the number of sites that were rejected in this report on the grounds that development <u>would erode important corridors or approaches to, or between, settlements.</u> These comments do not seem to be consistent with the approach being taken at Iwade	This site did not progress beyond Step 2. No change agreed.
437	Land east of Wises Lane,	CPRE	From the maps it seems that these two sites are in fact the same site, though they are described as 'west' and 'east' of Wises Lane respectively. It is difficult therefore to	The correct site plan has been attached to this report.

Site ref	Site address	Name	Comment	Response
	Sittingbourne		offer any specific comment without knowing more precisely the land involved in each. However, in general we would agree with the assessment presented and that the sites should not proceed beyond Step 2.	Change agreed.
		CPRE	Agree with the assessment.	Noted. No change agreed.
		Paul Sharpe Associates	It is not at all clear from the attached plans which parts of the site are described as “west” and “east” of Wises Lane. I note your approach vis a vis the RSS. However, I think it likely that the RSS will remain extant until Core Strategy inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.	The correct site plan has been attached to this report. Change agreed.
440	Land south of A2/west of Water Lane, Ospringe	CPRE	Agree with the assessment. It is noted that for this site the air quality issue along the A2 at Ospringe is acknowledged (unlike for sites SW/433 and SW/435), but the point should be expanded to recognise the impending declaration of an Air Quality Management Area. This will be a major constraint to any development that will add further traffic to the A2 at Ospringe.	Noted. Change agreed.
		Hillreed Homes	Struck by the number of sites that were rejected in this report on the grounds that development <u>would erode important corridors or approaches to, or between, settlements</u> . These comments do not seem to be consistent with the approach being taken at Iwade	This site did not progress beyond Step 2 because of poor access to GP services, suitable access to the A2 and air quality issues as well as impacts on the sensitive landscape setting of the site. No change agreed.
		Paul Sharpe	I note your approach vis a vis the RSS. However, I think it	See above.

Site ref	Site address	Name	Comment	Response
		Associates	likely that the RSS will remain extant until Core Strategy inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.	No change agreed.
441	Land west of Brogdale Road, Faversham	CPRE	Generally agree with the assessment, but the final paragraph under Step 2 should be deleted. This is an isolated, remote and unsustainable site that should not be revisited.	<p>With an as yet unknown housing target, many sites have been earmarked for future consideration in the event that the search for housing sites needs to go beyond those sites which successfully made it through the first sweep of the assessment.</p> <p>In this respect, given the smaller and compact nature of Faversham, a number of sites on the fringes of Faversham are closer to town centre facilities than many sites considered as urban extensions at larger towns. In this respect, it is considered reasonable that such sites should be re-examined if necessary.</p> <p>No change agreed.</p>
		Paul Sharpe Associates	I note your approach vis a vis the RSS. However, I think it likely that the RSS will remain extant until Core Strategy inquiry in which case I think some of these sites, particularly at Faversham, may fail Step 1.	<p>See above.</p> <p>No change agreed.</p>

Representations received in response to public consultation on the 2010/11 SHLAA (published March 2012)

Section / Appendix	Rep Nos	Representation Summary Points	SBC Draft Response
Appendix 2			
SW/105 Land off Sheppey Way, Bobbing	BF283	<ol style="list-style-type: none"> 1. Site is not remote and not "beyond the settlement". Accessibility and sustainability of the site is further confirmed by the fact that it lies within the walk-to school distance of mothers and toddlers from The Meads. 2. Development would enable refocusing of the village, contributing to the 5 year Housing Land Supply. 	No additional sites are being considered as part of the SHLAA. In any event, this site would have failed at Step 0 (settlement scope). Had this site been within the settlement scope, it
SW/168 FloPlast Ltd, Sheppey Way, Howt Green, Bobbing	DHA	<ol style="list-style-type: none"> 1. 1.5ha 2. existing business has relocated to Eurolink – poor quality site/inappropriately located 3. potential contamination and road traffic noise (A249) can be mitigated 4. single ownership/available for development 5. viable site for 45 dwellings 	No additional sites are being considered as part of the SHLAA. In any event, this site would have failed at Step 0 (settlement scope)
Appendix 4			
SW/013 Transit Works, Power Station Road	BF 574 Minster Parish Council	<ol style="list-style-type: none"> 1. Mix brownfield/greenfield land. 2. Local Wildlife part of the must be excluded from the development area. 3. Flood risk. 4. Suitable for housing or light industrial development subject to resolving the matters of ecology. 	<ol style="list-style-type: none"> 1. Noted – as reported 2. Noted – as reported 3. Noted – as reported 4. Noted – as reported
SW/034 BMM Weston, Faversham	BF745 Faversham Creek Trust,	<ol style="list-style-type: none"> 1. Should be withdrawn from the SHLAA until the Neighbourhood Plan has been developed and approved. 	<ol style="list-style-type: none"> 1. The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing the Neighbourhood Plan (which will balance all interests and cumulative impacts).
SW/071 Frognall Lane, Teynham	BF81 Mr Playford	<ol style="list-style-type: none"> 1. Too many houses are proposed. 2. Traffic generation 	<ol style="list-style-type: none"> 1. The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing Local Plan policy (which will balance all interests and cumulative impacts) 2. Kent Highways advise that a new access

			(alternative to Frogal Lane) would be required and mitigation against the effects of further traffic in Sittingbourne
	BF1262 Trenport	<ol style="list-style-type: none"> 1. Works could commence within 12-18 months of Local Plan allocation. 2. Completions would be at a rate of 50-100 dwellings per annum, [50-100-100-50], with flexibility depending on market recovering and number of phases. 	<ol style="list-style-type: none"> 1. Based on expected submission May 2013, his would equate to year 2014-2015 (rather than previously assumed 2024-2025) 2. This exceeds the assumed rate of 45 dwellings per annum, indicating that a national developer would be secured. Report has been updated to reflect this phasing.
SW/111 Milton Pipes, Sittingbourne	Solent Planning	<ol style="list-style-type: none"> 1. Note that there appears to be serious 5 year supply issues 2. Windfall allowances should not be included within the first 10 years 3. Agree that the collapse of the housing market has affected scheme viability 4. Do not agree with reduction in housing numbers for Sittingbourne town centre (and impact on greenfield sites) 5. Welcome continued inclusion of Milton Pipes in the SHLAA 6. Query viability advice for this site, in contrast HCA (landowner) are optimistic about delivery 7. Site could be delivered before 11-15 years, within 2-5 years 8. There is capacity for a higher number of units on site at 47dph. SHLAA density should be considered a minimum threshold 	<ol style="list-style-type: none"> 1. Noted 2. Windfall allowance is made for the last ten years of the plan period (not the first ten). Para 48 of NPPF allows consideration of historic windfall delivery in the five year supply 3. Noted 4. Yields have been reduced to reflect changing market conditions with regard to reliance on flats 5. Noted 6. Despite written requests no detail has been submitted with regard to viability, other than confirmation that the owner anticipates developing the site in the short term. 7. The Council has been unable to respond to this ascertain on the basis that no detail on viability/phasing has been offered to justify phasing the site earlier 8. Actual housing numbers will need to be tested through the planning application process. On the basis of advice to date the SHLAA figure is considered reasonable
SW/114 Halfway Primary School	BF98 Halfway Houses Residents Association, BF 574 Minster Parish Council	<ol style="list-style-type: none"> 1. Site is 1.5km from GP surgery 2. Mix brownfield/greenfield 3. Need to protect amenity of residents 4. Congestion will need to be addressed 	<ol style="list-style-type: none"> 1. This site is with 220m of two GP surgeries (Southdown Road and The Crescent) 2. Noted – as reported 3. Noted – as reported 4. This site is in existing use within the built up area. As assessment will ultimately need to be made with regard to traffic flows associated with the

			existing use and compared to that for the proposed housing. In any event, however, weight should be given to the regeneration of this brownfield site.
SW/140 Parsonage Farm, Newington	DHA Planning + others	<ol style="list-style-type: none"> 1. Support 2. Affordable housing provision will not be required (below threshold) 3. Site is currently viable within 0-5 year timeframe (appraisal undertaken by Strutt and Parker indicates higher sale price and no requirement for affordable housing) 4. Site could be developed for 14 houses (layout provided) 	<ol style="list-style-type: none"> 1. Noted 2. Noted – report to be updated 3. Site to be re-phased to 0-5 years 4. Capacity increased from 10 to 14
		<ol style="list-style-type: none"> 1. This side of Newington does not have the road infrastructure to support a further 10 dwellings 2. Result in at traffic hazard in vicinity of school 3. Illogical to expand Newington when public transport is contracting/being withdrawn. 4. Object. 5. Lack of infrastructure (doctors and pharmacy) to support development in the area. 6. Access roads are already too congested/narrow. 7. Poor electricity supply. 8. The northern part of the village (isolated by the A2) has no social/leisure amenities for youths/children. 9. Drainage and sewer inefficiencies. 	<ol style="list-style-type: none"> 1. Kent Highways advise that School Lane should be capable of supporting this small scale development. 2. See above 3. The site lies within 800m of a school and convenience store, as stipulated by the SHLAA methodology. It is considered that a small scale development on brownfield land should not be discounted on changes to existing public transport provision. 4. Noted 5. Noted. However, it is considered that the beneficial use of previously developed land should not be precluded on these grounds 6. See above (1) 7. This will need to be addressed by the developer 8. Noted. Overall it is considered beneficial to develop this brownfield site. 9. This will need to be addressed by the developer
SW/144 East of Station Road, Teynham	BF81 Mr Playford, BF248 Mr Kerridge	<ol style="list-style-type: none"> 1. Concerned about location of access and impact on the narrow/congested section of Station Road 2. Own land over which it is presumed access will be 	<ol style="list-style-type: none"> 1. Highway advice is reported, note that a TA will be required with provision for alternative on-street parking and improvements at junction with A2

		required – no prior consultation has been undertaken	2. Landowner has confirmed that access will be provided by acquiring an existing property in Station Road. The site report has been updated to reflect the fact that no access will be possible from Noble Close. As a consequence of this representation this site has been re-assessed and is now considered not to be suitable for development on the grounds of the access uncertainties.
	G W Finn	<ol style="list-style-type: none"> 1. Support 2. Access will be provided by acquiring an existing property in Station Road. 3. Provision will be made within the site for parking of vehicles which currently use on-street parking and for traffic light signals at the junction of Station Road and the A2. 	<ol style="list-style-type: none"> 1. Noted. 2. Noted – report to be updated 3. Noted
SW/165 Belgrave Road, Minster	BF97 Halfway Houses Residents Association, BF262 Mr & Mrs Palmer, BF574 Minster Parish Council, Mr Coulin,	<ol style="list-style-type: none"> 1. Existing road network is overloaded, with a dangerous junction with the A250/access is a constraining factor. 2. footpath link to Rosemary Avenue would need to be made across an open field 3. Local amenities are not available within 1.5km – Halfway School is to be moved to Danley Road/Queenborough Primary School (on the far side of the A249). The site at Sunnyfields, with a better access, was rejected on these grounds. 4. Site is not mostly level, it slopes from the top to a well maintained ditch 5. Brownfield sites should be considered first 6. Site has previously been excluded from the local plan - arguments against the 1985 proposal are still relevant 7. Good quality agricultural land 8. Loss of playing field 9. No jobs to justify more housing. 	<ol style="list-style-type: none"> 1. Report acknowledges that highway issues are not insurmountable 2. Footpath links would need to be designed into housing layout. 3. Report to be amended – shop 1.2km (Queenborough Service Stn); GP 1.4km (Southdown Road); School 1.5km (Queenborough). This site now fails at Step 2, and is reported at Appendix 4.3 as one of several sites that have housing potential. 4. Amend report - site is relatively flat, and contained by Furze Hill. 5. The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing Local Plan policy (which will balance all interests and cumulative impacts), giving preference to brownfield sites 6. Noted – see above 7. The Council is opposed to the loss of agricultural

			<p>land and supports the protection of the countryside. The issue of developing agricultural land needs to be balanced against the findings of technical reports (including the SHLAA) will help determine the most sustainable location for development over the plan period.</p> <p>8. Provision of a second access would mean crossing the existing playing field (owned SBC). Alternative/compensatory provision would be required</p> <p>9. These are matters for the Local Plan to consider, not the SHLAA.</p>
	Crown Estate	<ol style="list-style-type: none"> 1. Highly deliverable site – deliver housing within 5 years. 2. Site is relatively flat, and contained by Furze Hill. 3. New access is achievable off Belgrave Road. 4. Close to local services and amenities. 	<ol style="list-style-type: none"> 1. Noted – because of poor access to services, this site now fails the SHLAA methodology at step 2. It is however considered as a site with potential for housing (phased to start at the end of the 0-5 year period). The site promoter has not submitted further information in respect of viability/phasing. 2. Noted – report clarified 3. Noted 4. Noted – report clarified
SW/183 South east Iwade	BF508 Crest,	<ol style="list-style-type: none"> 1. Report is misleading, with regard to its rural character – Coleshall Farm has planning permission for mixed use development; the village gateway will be relocated south on completion of development at Coleshall Farm; residential to north and undeveloped (not agricultural land) to south and east. Alternative wording suggested. 2. Typo at Step 2 – should read Yes 3. Sustainability issues have not been considered consistently (see SW/329) 4. Landscape and Visual Assessment has been undertaken – concludes development both sides of the settlement gap would not substantially reduce the perceived gap 	<ol style="list-style-type: none"> 1. Amend report -clarify text 2. Noted – report updated 3. SW/329 comprises an assessment of an existing Local Plan allocation, rather than a new site. It accepts that constraints on the site remain the same. 4. This site is considered suitable for residential development. However, as part of the Local Plan process the Council has considered in combination effects of development on both sides of the A249. It has concluded that development should be directed towards to Sittingbourne, as the principal (and most sustainable) settlement, rather than comprising

		<ol style="list-style-type: none"> 5. Iwade has a high capacity to accommodate change, so further growth could take place without detrimental impact 6. Final section in sustainability section should be deleted 7. Site is viable within 0-5 years and should be re-phased 	<p>the separation of Sittingbourne/Iwade.</p> <ol style="list-style-type: none"> 5. See above. 6. Noted – report amended. 7. No evidence has been submitted in this regard (viability/phasing). The Council has anticipated that development would commence at the end of the 0-5 year period.
SW/191 Faversham Police Station	Hallam Land Management	<ol style="list-style-type: none"> 1. Not aware of plans for a replacement Police facility 	<ol style="list-style-type: none"> 2. Agent has confirmed that there remains a realistic prospect that the site will become available within a five year time frame.
SW/203 Ordnance Wharf, Faversham	BF745 Faversham Creek Trust	<ol style="list-style-type: none"> 1. Should be withdrawn from the SHLAA until the Neighbourhood Plan has been developed and approved 	<ol style="list-style-type: none"> 2. The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing the Neighbourhood Plan (which will balance all interests and cumulative impacts)
	Lee Evans	<ol style="list-style-type: none"> 1. Support 2. Site capacity is 11 units (as per – withdrawn - planning application SW/12/0489) 3. Could be completed from 2013 onwards 	<ol style="list-style-type: none"> 1. Noted 2. Amend capacity 3. Noted – phasing to be amended
SW/212 Bysingwood Primary School	Hallam Land Management	<ol style="list-style-type: none"> 1. Not aware of plans for a replacement facility 	<ol style="list-style-type: none"> 2. Development at this site would not require a replacement building
SW/325 Plover Road, Thistle Hill	BF 574 Minster Parish Council	<ol style="list-style-type: none"> 1. Support 	<ol style="list-style-type: none"> 2. Noted
SW/326 Scocles Road, Thistle Hill	BF 574 Minster Parish Council	<ol style="list-style-type: none"> 1. Rural greenfield Site – development not sustainable 2. Significant adverse impacts on landscape character, exacerbated by topography 3. Major highway issues - access would be limited to the A2500 and will require significant improvement to the traffic network 	<ol style="list-style-type: none"> 1. Land forms part of a previous housing allocation 2. This is a large development site, which would need to be landscaped to soften its impact on the outlook from adjoining countryside. 3. It is acknowledged that there will be transportation issues arising from development at this site with access, with the A2500 nearing capacity. This route would require improvements to allow development at this location.
SW/337 Crown Quay Lane,	Savills	<ol style="list-style-type: none"> 1. Net site area is 12.2ha (retail 4.1ha). 2. Disagree with assessment that only 8ha of the site 	<ol style="list-style-type: none"> 1. Report to be amended and site re-plotted to reflect omission of retail scheme.

Sittingbourne		<p>is developable (flood risk) – exact capacity should be informed by detailed site investigation into flooding and drainage.</p> <ol style="list-style-type: none"> Increase density (above 60dph) in vicinity of station. Tesco site (4.8ha) could yield 550 dwellings (100dph), and remaining 7.2ha 430 dwellings (60dph) – total approx 100. Site could come forward before estimated 16-20 year period – before 2016. 	<ol style="list-style-type: none"> In the absence of further advice to the contrary, the Council has assumed that only 50% of the site will be developable (making an allowance for infrastructure, flood exclusion and provision of a school – 2ha) Density has been re-assessed, giving a revised yield of 395 dwellings. No viability/phasing detail has yet been submitted. Phasing has, however, been re-assessed and it is anticipated that development will commence from 2017-18.
SW/353 Standard Quay, Faversham	BF745 Faversham Creek Trust	<ol style="list-style-type: none"> Should be withdrawn from the SHLAA until the Neighbourhood Plan has been developed and approved 	<ol style="list-style-type: none"> The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing the Neighbourhood Plan (which will balance all interests and cumulative impacts)
	Lee Evans	<ol style="list-style-type: none"> Support Potential capacity is 15-25 units Could become available from 2013 with completion 2013/14 	<ol style="list-style-type: none"> Noted Acknowledge greater capacity for residential development, but this needs to be balanced against the employment –led aspirations of the Neighbourhood Plan. Capacity should therefore be held at the level stated Noted
SW/354 Fentiman’s Yard, Faversham	BF745 Faversham Creek Trust	<ol style="list-style-type: none"> Should be withdrawn from the SHLAA until the Neighbourhood Plan has been developed and approved 	<ol style="list-style-type: none"> The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing the Neighbourhood Plan (which will balance all interests and cumulative impacts)
SW/356 SECOS, Faversham	BF745 Faversham Creek Trust	<ol style="list-style-type: none"> Should be withdrawn from the SHLAA until the Neighbourhood Plan has been developed and approved 	<ol style="list-style-type: none"> The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing the Neighbourhood Plan (which will balance all interests and cumulative impacts)
	Lee Evans	<ol style="list-style-type: none"> Support Site capacity is 20 Completion expected from 2013 	<ol style="list-style-type: none"> Noted Acknowledge greater capacity for residential development, but this needs to be balanced against the employment –led aspirations of the Neighbourhood Plan. Capacity should therefore

			be held at the level stated 3. Noted
SW/359 Standard House, Faversham	BF745 Faversham Creek Trust	Should be withdrawn from the SHLAA until the Neighbourhood Plan has been developed and approved	The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing the Neighbourhood Plan (which will balance all interests and cumulative impacts)
SW/405 Minster Academy	BF97 Halfway Houses Residents Association, BF574 Minster Parish Council,	<ol style="list-style-type: none"> 1. Site area has been reduced by the construction of the three storey school building. 2. Permission was refused for development in the 1990s due to ground drainage and access problems. 3. Site is 1.5km from GP surgery. 4. Support. 	<ol style="list-style-type: none"> 1. This site are remains as promoted, with the building work confined to other parts of Minster Academy. 2. Indications are that theses matters can be addressed 3. Site lies 589m from the GP surgery at The Crescent. 4. Noted.
	Sport England	1. If part of the same planning unit as the adjoining playing fields, site would need to be assessed against adopted Playing Fields Policy – presumption against loss of land last used as playing fields	1. Although within the planning unit, this raised area of land is not functionally suitable for use as a playing field.
SW/415 Colonels Lane, Boughton		1. Housing would be close to the A2 - noise and air pollution.	1. Noted. These issues would need to be addressed at planning application stage.
SW/417 Colonels Lane, Boughton		1. Housing would be close to the A2 - noise and air pollution.	1. Noted. These issues would need to be addressed at planning application stage.
SW/420 Mayfield, Teynham	BF81 Mr Playford,	1. Support	1. Noted
SW/424 Swan Quay, Faversham	BF745 Faversham Creek Trust	1. Should be withdrawn from the SHLAA until the Neighbourhood Plan has been developed and approved	1. The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be taken into account when preparing the Neighbourhood Plan (which will balance all interests and cumulative impacts)
	Lee Evans	<ol style="list-style-type: none"> 1. Support. 2. Capacity should be increased – 14 units (conversion); 6 units (Belvedere Road) 25-30 units (Creekside). 3. Available from 2013, completion 2013/14. 	<ol style="list-style-type: none"> 1. Noted 2. Acknowledge greater capacity for residential development, but this needs to be balanced against the employment –led aspirations of the Neighbourhood Plan. Capacity should therefore be

			held at the level stated. 3. Noted
SW/422 Watermark, Staplehurst Road, Sittingbourne	Rapleys	<ol style="list-style-type: none"> 1. Demonstrated (and accepted) that site isn't suitable for further employment. 2. Concern relating to highway impact has been addressed in planning application SW/11/0637 (residential development). 3. Site could be brought forward earlier with flexibility in the amount of affordable housing and planning obligations. 	<ol style="list-style-type: none"> 4. Noted – as reported. 5. Noted. 6. Phasing will also be dependent on issues being resolved with regard to the impact of vehicular movements on the A249/Junctio 5 of the M2. These are note expected to be resolved within 0-5 years.
Appendix 7			
SW/037 Land at Ham Farm, Faversham	Hallam Land Management, DHA	<ol style="list-style-type: none"> 1. Query how access will be achieved 2. Local services and facilities are a considerable way off. Very limited bus service. 3. Sensitive landscape. 4. Mineral workings have been worked out and are being restored. No impediment exists to the immediate release of this site. 5. Contribute towards 5 year supply. 	<ol style="list-style-type: none"> 1. Originally, this site was not considered suitable for housing development, on grounds of access. It is likely that access could be direct from Ham Road, ensuring that it retained its rural character. 2. Noted – see report 3. Noted – see report 4. The report at Appendix 4.3 (other sites with potential) advises that it is expected that the deprived nature of the adjoining area will suppress values, such that the site will not be viable to develop in the short term. No detailed advice has been received to the contrary, although it is noted that there is a willing landowner. 5. See above
SW/042 South of Brielle Way, Queenborough	BF82 Lewis & Co,	<ol style="list-style-type: none"> 1. Wish to promote a housing allocation on small part of site (0.52ha) for 15 dwellings. 2. Note that technical paper No.2 allows for 790 outstanding dwellings to come forward as windfalls – as there is a shortfall in housing land, the Council is urged to consider this additional site. 3. Adjoins settlement boundary. 4. Not located in an SPA, ASC or SSSI. 	<ol style="list-style-type: none"> 1. Noted – submission plan has been amended and report updated. 2. Noted – however, the site fails to progress on the basis of lack of access to services (and flooding). 3. Noted – as such it falls within the settlement scope of the SHLAA methodology. 4. Noted – reported has been updated. 5. Noted (see 2 above).

		<ol style="list-style-type: none"> 5. Site is available and of suitable size. 6. Reduced site area is not protected by policy E12 (biodiversity/geological importance). 7. Logical infill – adjoining railway and built up area boundary. 8. Not out of scale in context of Queenborough (as set out in 2010 Urban Capacity Study). 9. flood mitigation measures should be reviewed in accordance with the exception text in the NPPF 10. Site is not restricted by listed buildings, conservation areas, land contamination, loss of playing fields or employment floorspace. 11. Site would be deliverable within the next 5 years. 	<ol style="list-style-type: none"> 6. Noted (see 2 above). 7. Noted (see 2 above). 8. Noted (see 2 above). 9. Noted (see 2 above). 10. Noted (see 2 above).
SW/046 Land fronting London Road, Ospringe	BF1347	<ol style="list-style-type: none"> 1. Should be considered as a suitable location for housing. 	<ol style="list-style-type: none"> 1. The Council consider that this site is not suitable for housing by virtue of poor access to a GP surgery, access to the A2, air quality issues in Ospringe and landscape impact.
SW/047 Land at London Road/Water Lane, Ospringe	BF1347	<ol style="list-style-type: none"> 1. Should be considered as a suitable location for housing. 	<ol style="list-style-type: none"> 1. The Council consider that this site is not suitable for housing by virtue of poor access to a GP surgery, shop, access to the A2, air quality issues in Ospringe and landscape impact.
SW/049 Chaffes Lane, Upchurch	BF1347	<ol style="list-style-type: none"> 1. Should be considered as a suitable location for additional growth 	<ol style="list-style-type: none"> 1. The Council consider that this site is not suitable for housing by virtue of poor access to a GP surgery, public transport and landscape impact.
SW/050 Chilton Manor, Sittingbourne	D & C M Epsley Ward Homes	<ol style="list-style-type: none"> 1. Urban Extension Capacity Study indicates that this is the only site south of Sittingbourne with the landscape capacity to accommodate moderate change (for house building) 2. A balance of locations should be chosen, so that development is not concentrated in one place (NW Sittingbourne) 3. Site is available and deliverable, to meet existing demand, and has no infrastructure issues 4. Landscape issues can be mitigated. 5. Site is suitable, available and achievable. 6. Could come forward with Chilton Manor (SW/107) and Muddy Lane (SW/204). 	<ol style="list-style-type: none"> 1. The study indicates that only minor development would be acceptable in landscape terms. It does not support large scale development in this location. 2. This site is not considered suitable for housing by virtue of poor access to public transport and GP surgery. 3. Noted, but this does not address landscape concerns. 4. Issue relates not just to mitigation, but to the scale of development envisaged. 5. The Council maintains that this site is not suitable, for the reasons set out in the site report. As such, it is premature to assess whether it

			would be available and achievable. 6. This would exacerbate landscape issues.
SW/094 Four Gun Field, Otterham Quay	Kingsley Smith	<ol style="list-style-type: none"> 1. Riverside Junior School is 800m from this site (and not 1km, as reported) 2. There are 9/10 buses a day to and from the Medway towns 3. Rail station is easily access from the site (via a 10 minute bus ride) 4. A combination of bus service providers give access to GP surgeries, secondary schools and employment 	<ol style="list-style-type: none"> 1. The school lies 954m from the centre of this site 2. Methodology requires to services an hour 3. Methodology requires to services an hour, within 800m from the site 4. Noted, but exceeds sustainability criteria
SW/101 Land at Hempstead Lane, Bapchild	BF293 Paul Sharpe Associates	<ol style="list-style-type: none"> 1. Promote land as a housing site. It is located on the edge of one of the larger villages in the Borough and immediately fronting the A2 and its public transport corridor. 2. Consider that failure of site on grounds of access to a GP surgery is harsh. Site is in a sustainable location. 3. Notes that development at Teynham is within same traditional orchard landscape. Development of this site for housing would not result in any incursion into or loss of "traditional orchard". 4. Site can contribute to 5 year Housing Land supply. 	<ol style="list-style-type: none"> 1. Noted. 2. Infrequency of bus service and poor access to GP surgery resulted in the Council concluding that this is not the most sustainable of locations. 3. Issue is not one of incursion into an area of traditional orchard, but of incursion into the traditional landscape. 4. Noted
SW/107 Land at Chilton Manor/Highsted Lane, Sittingbourne	BF294 Paul Sharpe Associates	<ol style="list-style-type: none"> 1. Promote land as a housing site. 2. Seek to promote site in association with SW/204 and SW/050 (Ward Homes). 3. Highway and landscape issues are capable of satisfactory resolution as is the physical extent and quantum of development. 4. Site suitable for housing and are immediately available and capable of delivering new housing contributing to the 5 year Housing Land Supply. 	<ol style="list-style-type: none"> 1. Noted 2. The Urban Extension Capacity Study indicates that only minor development would be acceptable in landscape terms. It does not support large scale development in this location. 3. While highway issues may be capable of resolution, Landscape issues are a more fundamental concern. 4. The Council does not concur with this view point (see above)
SW/123 North of Iwade	Iwade PC	<ol style="list-style-type: none"> 1. Seek assurance that this site will be removed from the SHLAA on the basis that cumulative consideration of site at Iwade/NW Sittingbourne 	<ol style="list-style-type: none"> 1. Site will remain in the SHLAA. The purpose of the SHLAA is to assess potential housing sites. It forms part of the evidence base which will be

		has resulted in the Council not promoting this site in the draft Core Strategy	taken into account when preparing Local Plan policy (which will balance all interests and cumulative impacts).
SW/126 Cryalls Lane, Sittingbourne	BF68 Mr Johnson	<ol style="list-style-type: none"> 1. concerned about access in relation to the number of units; proximity/congestion at Westlands School; use as a 'rat run' through to the M2 via Borden 2. need further assessment of methane gas transmission and leachates from the former waste site 3. badgers (protected species) are present on the site 	<ol style="list-style-type: none"> 1. Kent Highways advise that the impact of future traffic would need to be assessed through traffic surveys and modelling 2. Noted. 3. Report has been updated to reflect the fact that further investigations would need to be undertaken in this regard.
SW/142 Land at Cellar Hill, Teynham	BF1100 DHA,	<ol style="list-style-type: none"> 1. Promote site for housing; deliverable within 5 years and well related to the built confines of Teynham and its shops and services. 	<ol style="list-style-type: none"> 1. The Council consider that this site is not suitable for housing by virtue of poor access to a primary school, biodiversity and landscape/streetscape impacts
SW/158 r/o 33 Highfield Road. Minster	DHA Planning	<ol style="list-style-type: none"> 1. Included in 2009 SHLAA for 24 dwellings – it now no longer forms part of the SHLAA supply. 2. Disagree that site represents an incongruous and illogical extension – has a positive relationship with urban fringe. 3. Access can now be proved alongside No.47. 4. Exclude dogleg to improve biodiversity. 5. Illustrative Masterplan submitted. 6. Two storey development would not impact on landscape (with reference to Landscape Capacity Study). 7. Sustainably located with regard to services at Halfway. 	<ol style="list-style-type: none"> 1. This site has been re-appraised since the publication of the 2009 SHLAA. On reflection, it is considered that the provision of housing on this site would be incongruous in the landscape setting, going beyond what could reasonably be described as a modest development with limited impact on the landscape, at odds with the local pattern of development. 2. Noted (see above). 3. Noted. 4. While this may improve biodiversity, it doesn't address the heart of this issue, which is the incursion of development into the landscape. 5. Noted. 6. Noted (see above). 7. Agreed.
SW/179 Old Sale Field, Ruins Barn Road, Sittingbourne	GW Finn	<ol style="list-style-type: none"> 1. Detail submitted in respect of development of this site for GP surgery, retirement homes, care home and key worker accommodation. 	<ol style="list-style-type: none"> 1. While this further information is noted, the Council remains of the opinion that this site is not suitable for development as it is in an unsustainable location, remote for local services and facilities.
SW/194	BF574 Minster	<ol style="list-style-type: none"> 1. Significant greenfield parcel site, with open views 	<ol style="list-style-type: none"> 1. Noted – as reported.

Cowstead Corner (Barton Hill Drive), Minster	Parish Council	<ol style="list-style-type: none"> 2. Not sustainable – located near a primary school or any local services. 3. Highway issues with access onto the A2500 Lower Road which is already operating beyond its capacity. 4. Landscape impact exacerbated by the topography. 	<ol style="list-style-type: none"> 2. Noted – as reported, although as site of this size would be expected to generate its own provision. 3. Noted – as reported. 4. Noted – the issue of landscape impact has been carefully considered, and resulted in a reduction of dwellings from a potential 700 to 500. A significant landscape buffer would need to be planted to the west of the site, as reported at Appendix 9.
	DHA Planning	<ol style="list-style-type: none"> 1. support 2. provision of woodland buffer is acceptable to landowner – will be considered in detail in a Masterplan 3. site yield could be increased in response to landscape issues 	<ol style="list-style-type: none"> 1. Noted. 2. Noted. 3. This would need to be very carefully explored in the context of landscape and traffic issues.
SW/204 Land at Muddy Lane, Sittingbourne	BF294 Paul Sharpe Associates	<ol style="list-style-type: none"> 1. Promote land as a housing site. 2. Seek to promote site in association with SW/107 and SW/050 (Ward Homes). 3. Highway and landscape issues are capable of satisfactory resolution as is the physical extent and quantum of development. 4. Site suitable for housing and are immediately available and capable of delivering new housing contributing to the 5 year Housing Land Supply 	<ol style="list-style-type: none"> 1. Noted 2. The Urban Extension Capacity Study indicates that only minor development would be acceptable in landscape terms. It does not support large scale development in this location. 3. While highway issues may be capable of resolution, Landscape issues are a more fundamental concern. 4. The Council does not concur with this view point (see above)
SW/407 Land off High Street, Newington	BF282 Paul Sharp Associates	<ol style="list-style-type: none"> 1. Promote land as a housing site. 2. Should have determined that, subject to satisfactory investigation of the Air Quality issue, that this site is suitable, available and achievable for housing, contributing to the 5 year Housing Land Supply. 	<ol style="list-style-type: none"> 1. Noted. 2. The Council remains of the view that the in combination effects with regard to lack of access to a GP surgery, traffic and air quality issues, that this site is not suitable for development.
SW/418 Land adj 60 Ruins Barn Road, Sittingbourne	DHA Planning	<ol style="list-style-type: none"> 1. Previously developed land. 2. Existing footway enables safe pedestrian access to Sittingbourne. 3. Site too small (0.37ha) for alternative uses. 4. There should be no objection to loss of countryside (as informed by landscape capacity study) – site 	<ol style="list-style-type: none"> 1. Noted. Site is occupied by a TV Rely Mast. 2. It is a 2.2km walk to the local shops at Northwood Drive, which exceeds the 800m stipulated in the SHLAA methodology. 3. Noted. 4. The Council supports the protection of the

		<p>only considered unacceptable because it is unsustainably located (public transport/access to services).</p> <p>5. NPPF – presumption in favour of sustainable development. Local plans should allocate land with the least environmental value and previously developed. Balance this against remote location of the site.</p> <p>6. Site should be included as part of the SHLAA supply – suitable and deliverable for 8 dwellings.</p>	<p>countryside. The Landscape Capacity Study advised that countryside in this location would have difficulty in accommodating further urban development.</p> <p>5. The Council is of the view that this site is not sustainably located, being remote from local services and facilities.</p> <p>6. The Council remains of the view that the site is not suitable for development (see above).</p>
SW/433 Land adjoining A2/Western Link, Ospringe, Faversham	BF1057	<p>1. 4.8ha of land sandwiched between the B2045, A2 and the railway line at Faversham promoted as a housing site (100 units)/budget hotel.</p> <p>2. Previously promoted in the Local Plan and emerging Core Strategy process as an employment site for B1 uses.</p> <p>3. Extension Landscape Capacity Study concludes that site could be suitable for small scale commercial or housing development</p> <p>4. Employment Land Review states that its prominent location means that it has a potential gateway role for Faversham.</p>	<p>1. The Council remains of the view that this site is not suitably located with regard to access to a GP surgery, provision of a vehicular access and air quality issues in Ospringe.</p> <p>2. The previously Inspector's findings are set out in the SHLAA report. The site was not included in the 2008 Local Plan.</p> <p>3. The Landscape Capacity Study takes a contrary view to the previous Local Plan Inspector who concluded that development would have a serious impact on the character and appearance of the area and would affect the rural approach to Faversham. The Council is of the view that development near adjoining parkland would have a harmful effect.</p> <p>4. See above.</p>
SW/440 Land south of A2/west of Water Lane Ospringe	BF1347	<p>1. Should be considered as a suitable location for housing.</p>	<p>1. The Council remains of the view that the in combination effects with regard to lack of access to a GP surgery, shop, traffic and air quality issues, that this site is not suitable for development.</p>
SW/441 Land west of Brogdale Road	BF1043 Miliken & Co	<p>1. Developable within the next 5 years (2011 to 2016) for 66 + houses.</p> <p>2. Landowner will shortly submit an outline planning application for 100 units.</p>	<p>1. Noted. This site was excluded at Step 2 on the grounds that it was not suitably located with regard to access to services and facilities. Re-assessment of the site (Appendix 4.3) acknowledges that any site at the edge of Faversham's urban boundary would have the same issues and in the event that the site was</p>

			needed for housing targets to be met, this would need to be accepted. 2. Noted.
Port of Sheerness	NLP	1. committed to regeneration of Port and progressing plans for mixed use development; up to 3000 dwellings; 12,100sqm retail; 18,600 sqm leisure/hotel; 17.700sqm office; Masterplan incorporates use of reclaimed land	1. Insufficient evidence has been submitted with regard to this site coming forward. A site of this size would need to come forward via the Local Plan process, provision for which is made under policy AC3
Appendix 8			
SW/045 Oak Lane, Upchurch	BF1347	1. Should be considered as a suitable location for additional growth	1. The Council does not concur on this point. The site is in use as allotments, which there is a need for.
SW/091 Western Link, Faversham	Boyer Planning	1. Increase capacity to 150 dwellings (50 dph/5ha), with employment on residual 3ha (to include budget hotel and wide employment base). 2. Site could come forward as part of the five year supply.	1. This site is now considered appropriate for housing development, as better sited employment/mixed used sites have come forward. 2. Noted.
SW/402 Borden Grammar School, Sittingbourne	Sport England	1. Support protection of playing field.	1. Noted
SW/403 Abbey School, Faversham	Sport England	1. Support protection of playing field.	1. Noted
SW/409 Sittingbourne Community College	Sport England	1. Support protection of playing field.	1. Noted
Appendix 9			
SW/057 Manor Farm Key Street	Ms E M Dangar	1. This site is suitable and available. Keen to progress	1. Noted
New sites			
Lamberhurst Farm, Highstreet	Chapel Place Limited	1. Mix greenfield/brownfield land at Highstreet	1. This site fails at Step 0 (settlement scope).
Barrow Green Farm, Teynham	G W Finn	1. Adjoins Teynham, close to schools, shops, railway station and bus services.	1. This site adjoins the village boundary and has reasonable access to local services. Access from the Lower Road may, however, be an issue. It will be assessed in accordance with the SHLAA methodology.

Orbital Mailing, Staplehurst Road, Sittingbourne	DHA Planning	<ol style="list-style-type: none"> 1. 1.5ha 2. low score in ELR – inappropriate to safeguard site for employment (outdated and constrained site) 3. urban location, suitable for residential development 4. alternative premises will be sought in the area 5. site will be available within the plan period 6. site is considered viable to develop for 60 units (30-40 dwellings per hectare) 	<ol style="list-style-type: none"> 1. This site is not the most sustainable in terms of access to a primary school/GP, but as a brownfield site these concerns would be outweighed by the advantages of regenerating a brownfield site. It has been assessed in accordance with the SHLAA methodology and now comprises part of the SHLAA supply.
Fulston Manor Playing Field, Ruins Barn Road, Sittingbourne	BF1352 Nathan Antony	<ol style="list-style-type: none"> 1. Promote 4.7ha the site currently used Fulston Manor School for sports pitches. 2. Adjoins built-up area boundary. 3. Site is well served by public transport - bus stops at the junction of Ruins Barn Road, Tunstall Road, Cromer Road and Woodstock Road. Railway station is located approximately 2km to the north. 4. Existing vehicular and pedestrian access is off Ruins Barn Road. 5. Site could contribute to housing targets – 200 dwellings. 6. Development would represent a logical rounding-off of the existing built form, provision of a substantial landscape buffer could provide a transition from urban to rural areas. 7. Contribute towards five year supply. 	<ol style="list-style-type: none"> 1. This site fails at Step 0 (settlement scope).
Funton Brickworks, Sheerness Road	BF1404	<ol style="list-style-type: none"> 1. 16.5 acres promoted for residential development. 2. Low score assigned to site by ELR - unsustainable employment site 	<ol style="list-style-type: none"> 1. This site fails at Step 0 (settlement scope).
Church Road, Tonge	BF37	<ol style="list-style-type: none"> 1. 16.25 acres 2. adjoining strategic allocation at NE Sittingbourne 3. 100 dwellings 	<ol style="list-style-type: none"> 1. This site fails at Step 0 (settlement scope).
Recreation Ground, Upchurch	BF1347	Should be considered as a suitable location for additional growth	<ol style="list-style-type: none"> 1. This site is in use as public open space and at Step 1 (policy constraints)