

Application Reference 24/502123/EIOUT

Application Description:

Outline application (all matters reserved except for access) for a mixed use phased development comprising up to 1,815 dwellings (Use Class C2 and C3); an Employment park (Use Class E(g) and B8); local centre accommodating a mix of units to provide a Health and Wellbeing Centre (Use Class E(e)), all purpose store (Use Class E(a)), shops/ancillary retail units (Use Class E(a)), community/general use units (Use Class F2) and food and beverage units (Use Class E(b)); public open space and recreation including community park, recreation trail and improved pedestrian/cycle links across the A2; sports and education facilities comprising 2 From Entry (2FE) primary school (Use Class F1(a)), early years centre (Use Class E), leisure facility (Use Class E(d)) and sports pavilion (Use Class E(d)); provision of a minimum of 10% Biodiversity Net Gain; transport and access infrastructure including an integrated bus link to the surrounding area, upgrades to the Dunkirk A2 junction through a new trunk road slips and an electric vehicle charging hub (c.0.2 ha) within the village centre for approximately 36 vehicles as a mix of medium, rapid, ultra rapid and Tesla chargers, alongside associated facilities including toilets and potential for cafe facility; and associated parking, servicing, utilities, footpath and cycle links, drainage, ground and other infrastructure.

Land North And South Of The A2 Boughton Bypass Dunkirk Kent ME13 9LG

Introduction

We wish to make representations on the above planning application and note that the proposed development includes a mix of uses to support essentially a new settlement in Swale.

We have commented first on the principle of the development, followed by comments on the detailed elements of the application.

We note that Swale Borough Council has a published 5-year land supply, and the proposal is on previously undeveloped land. We are also aware that Swale Borough Council had not previously proposed the site in a Regulation 19 Local Plan that was withdrawn. This clearly affects how the proposal will be considered against national and local policies.

Housing Need

Housing need for Swale is currently delivered through strategic site allocations in the adopted Local Plan and made neighbourhood plans.

The application site is not a site allocation in the adopted Local Plan, Bearing Fruits. Furthermore, the published land supply is in excess of 5-years.

It is noted that the Design and Access Statement does not accurately reflect this current position and therefore, the argument of tilted balance in this case does not apply as suggested.

Furthermore, the design and access statement fails to identify that the Made Boughton and Dunkirk Neighbourhood Plan caters for the projected level of growth in the neighbourhood area through site allocations and strategic sites in the local plan. Given this is the most recent plan, the application makes no case for departure from the Development Plan which includes the adopted Local Plan and the relevant Neighbourhood Plan.

SHLAA 2020

The application site appears in the SHLAA as site reference SLA18/156 Foresters Lodge Farm. Whilst the assessment notes that the site is not subject to any high-level constraints that would automatically exclude the site, it did conclude in the assessment outcome 'unsuitable' siting that:

"the site is considered to be in an unsustainable location which is not suitable for residential development."

As the site is considered unsustainable there are no planning merits to support departure from national, local plan or neighbourhood plan policy.

Planning Policy Context

There is no planning statement submitted as part of the submission. However, the design and access statement does include a section on policy context. This is inaccurate and incomplete. It suggests that the latest version of the NPPF is January 2024 not December 2023. The planning context notes the made Boughton and Dunkirk Neighbourhood Plan yet omits to consider any of the relevant policies.

Illustrative Masterplan and Phasing Plan

We note the coloured illustrative masterplan includes an indicative layout. Read in conjunction with the building heights plan the proposed 5 storey elements do not reflect the character of the area, which is predominately 2-storey in the neighbouring villages.

The phasing plan is ambiguous in relation to the delivery of the community facilities and services, indicated as phases 2-4. This would result in a majority of the indicated residential development (phases 2-3) being complete before all the community services and facilities were delivered. This would further exacerbate the unsustainable location. There is a

danger that developing these piecemeal would have a detrimental impact for any new community created.

Natural Environment and Landscape

The proposal will result in the loss of previously undeveloped land, within the impact zone of SSSI's and adjoining a local designated site of biodiversity that surrounds the application site. The site is also entirely within an area identified as 'high landscape value' in the county.

The net gain in biodiversity falls short of the national target of 20% on greenfield sites.

Access and Movement

This proposal is a development on previously undeveloped land. The supporting illustrative masterplan does not demonstrate good permeability through the site or appear to include traffic free routes, supporting active travel.

The cumulative impacts of other developments should be taken into account when considering this scheme, including the impact on Brenly Corner. There are other significant current planning applications that adjoin the M2. The Town Council wish to highlight the importance that Kent County Council should consider the impacts of the proposed schemes should they be granted consent. The submitted documents do not cater for this eventuality and therefore cannot provide an accurate projection of the true implications to highway capacity and safety.

Sewage

The proposal is for the foul water from the development to be discharged to Faversham Sewage Works which is already working at over capacity. Any additional discharge would cause local flooding. A development of 1815 dwellings should be providing facilities on site.

Sports Provision

The sports provision is not adequate for the future population of the 1815 dwellings.