

Statement of Community Involvement for Land off Swanstree Avenue, Sittingbourne

Disclaimer

Please note that this Statement of Community Involvement (SCI) contains complete copies of all correspondence received during pre-application consultation. Some of the correspondence includes personal details such as names, addresses and email addresses and have been provided in an unaltered form to ensure full transparency. A fair Processing Notice was included on the consultation leaflets and website, which made clear to members of public providing this data that it would be forwarded to the LPA as part of an application. The Council will of course need to handle this information in line with its own data protection policies.



October 2021

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1 INTRODUCTION

1.1 Background

1.1.1 This Statement sets out the process of community engagement that has been undertaken by Gladman Developments Ltd, referred to herein as 'Gladman', to inform an outline planning application for residential development and open space at Land off Swanstree Avenue, Sittingbourne.

1.2 Policy Background

1.2.1 This Chapter will consider relevant National and Local guidance with regards to community consultation.

1.2.2 Swale Borough Council's Statement of Community Involvement (adopted 2018) is a statutory document which details how and when the Council will involve the community in the preparation of the planning policy documents that make up its Local Plan. It also provides information on the Council's approach to engaging the wider community in the process of determining planning applications, particularly those involving major development proposals. The aim is to strengthen community involvement in planning over time and to achieve a widespread level of support for the policies that will shape development and the future use of land in Swale Borough. The consultation undertaken for this application has had regard to the guidance contained within this document.

The Localism Act (November 2011)

1.2.3 In November 2011, the Localism Act received Royal Assent. This is the Government's method of devolving greater powers to Councils and neighbourhoods in order to give local communities more control over planning decisions.

1.2.4 Of particular relevance is paragraph 122 of the Localism Act which introduced a new requirement for developers to bring the proposal to the attention of majority stakeholders and people living within the vicinity of the development. The Act further states that developers should "have regard to any responses to the consultation" received.

1.2.5 Specifically, Section 61W dictates the requirement to carry out pre-application consultation where a person proposes to make an application for planning permission for the development of any land in England, and the proposed development is of a description specified in a Development Order.

- 1.2.6 Where section 61W applies, section 61X sets out there is a duty to take account of responses to consultation. Applicants should consider responses received before proposals are finalised and show how they have been taken into account when submitting the application.
- 1.2.7 At present there is no legislative requirement, notwithstanding this, Gladman maintains it is good practice to seek the views of the local community prior to the formal submission of the application.

National Planning Policy Framework

- 1.2.8 In 2021, the Government published the latest National Planning Policy Framework (NPPF). The Government's aim with the NPPF across its iterations has been to simplify the planning system in the UK.
- 1.2.9 This has applied since the first NPPF in 2012, with Greg Clark MP writing in the Forward that:
- “People have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities...This National Planning Policy Framework changes that...we are allowing people and communities back into planning”.**
- 1.2.10 There is, therefore, a clear rationale from the Government to increase the amount of public consultation undertaken in the planning process.
- 1.2.11 The section on 'pre-application engagement and frontloading' within the NPPF states how early engagement can 'improve the efficiency and effectiveness of the planning application system for all parties' (paragraph 39) thus leading to 'better coordination between public and private resources and improved outcomes for the community' (para. 39).
- 1.2.12 Paragraph 40 further states that whilst a Local Planning Authority (LPA) 'cannot require that a developer engages with them before submitting a planning application', they should nevertheless 'encourage take-up of any pre-application services they do offer'. Furthermore, and where deemed to be beneficial, the LPA should 'encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications'. This is to ensure that any potential issues are resolved as early in the planning process as possible.

Swale Borough Council Statement of Community Involvement (SCI)

- 1.2.13 Swale Borough Statement of Community Involvement (SCI) was formally adopted in 2018 and sets out the Council's approach to stakeholder engagement for planning applications within the Authority. The Council released an update in 2019 announcing temporary changes to physical consultation due to COVID.
- 1.2.14 The SCI provides information on the Council's approach to engaging the wider community in the process of determining planning applications, particularly those involving major development proposals.
- 1.2.15 The SCI encourages community engagement when determining major development proposals setting out in the Key Stages of Planning Applications at the pre-application stage:
- 'We strongly encourage applications to discuss their proposals, both minor and major, with neighbours, the local community...'**
- 1.2.16 Having considered Swale Borough Council's SCI, Gladman have completed a comprehensive programme of community engagement which is considered appropriate for the proposed development of this site and meets the terms of the SCI.
- 1.2.17 This report details the programme and the results of the consultation, meeting the requirement to submit such a document as part of a planning application.
- 1.2.18 As stipulated previously, Gladman have endeavoured to undertake and complete a full and comprehensive consultation exercise that complies fully with both National and Local policy guidance.

2 ENGAGEMENT WITH LOCAL COMMUNITY AND STAKEHOLDERS

2.1 Engagement with the Local Community

2.1.1 In order to seek to reach the widest number of residents and businesses in the area, Gladman undertook a twofold public engagement exercise. In the first instance, a leaflet drop, and secondly, a dedicated website. Further details of each are provided below.

2.2 Initial Consultation Leaflet

2.2.1 Leaflets outlining the development principles together with details of our dedicated website and how to make comments were distributed on 6th September 2021 to approximately 717 households & businesses within the proximity of the site. On the basis that on average 2.39 people live in a household (local average taken from ONS), the leaflet was distributed to over 1,713 people. A copy of the leaflet is included at **Appendix A**.

2.3 Your-views Website

2.3.1 Gladman have a dedicated website for each of its projects containing details of the scheme, copies of the consultation boards, leaflet and other information about the scheme; it also allows visitors to the website to provide feedback via email or by post to Gladman.

2.3.2 The address for the Sittingbourne website, which is updated on a regular basis, is www.your-views.co.uk/sittingbourne and was operational from 6th September 2021

2.3.3 A series of Consultation / Information boards were displayed on the website providing background information of the scheme and identifying the factors which impacted on the draft proposals. Comment forms for members of the public were also available on the website. Copies of the boards displayed on the website are included at **Appendix B**.

2.3.4 At present, 29 responses have been received from the leaflet and website via email/comments form. Comments received were mixed with some level of support and constructive comments whilst other residents opposed the scheme. A summary of the comments made can be found in the next chapter.

2.3.5 Copies of feedback received as part of the leaflet drop and the dedicated webpage are included at **Appendix C**.

3 CONSULTATION REVIEW

3.1 Consultation Outcomes

3.1.1 Gladman is pleased that a number of people engaged with the consultation process for the proposed site and provided comments during the pre-application process.

3.2 Summary of Comments and Responses

3.2.1 Responses to matters which emerged from the various forms of community engagement are detailed in the table below, together with Gladman's response.

Summary of Comments	Response
<p>Impact on Area</p> <ul style="list-style-type: none"> • Suggests that the application is for 580 homes not 137 • No need for housing given development in area, Sittingbourne's had its fair share 	<p>The applicant submitted a planning application in 2015 for a scheme at Swanstree Avenue for 540 dwellings and a 50no C3 retirement apartments. The application was refused by Swale Borough Council (SBC) in July 2016. The current application is for up to 135 dwellings and no more.</p> <p>With the aim of alleviating affordability issues and ultimately the housing crisis Local planning Authorities are required by national policy to have a five-year supply of housing at all time, Swale cannot currently meet that requirement. Sittingbourne is one of the most sustainable towns to accommodate the current housing need, the planning statement sets this out in detail.</p>
<p>Site Location Issues</p> <ul style="list-style-type: none"> • Need to develop on brownfield not greenfield • Should not develop valuable agricultural land • Will ruin walking routes 	<p>Both greenfield and brownfield development are a necessary part of the spatial strategy devised by the council to meet their housing requirement. Development of greenfield land increases viability and therefore aids delivery of affordable homes and wider community benefits.</p>

<ul style="list-style-type: none"> • The land will need deep development due to the nature of the ground • We need our area as green belt • Not in the Local Plan 	<p>Government policy seeks to protect agricultural land of high quality which is referred to as Best and Most Versatile (BMV) land. BMV is prominent in the authority. 45% of the application site is Grade 3b (based on the Agricultural Land Classification map for Swale Borough) loss of BMV would be minimal.</p> <p>The existing public rights of way will be adjacent to, or through proposed green infrastructure of either woodland/trees/hedgerow/proposed orchards, thus maintaining enjoyable and appealing pedestrian routes.</p> <p>The site is not designated as Green Belt, nor is it adjacent to it.</p> <p>The site is not currently allocated for development within the adopted Local Plan. However, in the interest of working with the council and community Gladman have submitted the site for potential promotion through the Emerging Local Plan. Due to the lack of housing land supply in the borough, sustainable unallocated sites are also encouraged to be approved by the planning committee as a matter of national policy under the presumption in favour of sustainable development.</p>
<p>Affordable Housing</p> <ul style="list-style-type: none"> • Will seek minimum requirements • Houses will sell to London councils who send their unwanted tenants • Affordable housing will not be affordable for local residents 	<p>There has been a significant deficit in affordable housing delivery in Swale since the beginning of the Local Plan in 2014 with an average delivery of 98 dwellings per annum against a requirement of 190 affordable homes per annum. With the latest</p>

	<p>evidence indicating a markedly higher need of 287 dwellings per annum,</p> <p>Policy DM8 requires development in Sittingbourne to deliver 10% affordable homes, which on this site would equate to approximately 14 affordable units. This application seeks to deliver 30% affordable homes equating to approximately 41 affordable units lifting potentially 98 people out of housing need.</p> <p>Affordable housing management will be under the responsibility of registered providers, currently the eligibility criteria for applying for affordable housing in Swale requires you to have lived in Swale four out of five years.</p>
<p>Ecology</p> <ul style="list-style-type: none"> • Important to take new planting into account • Nature will be lost 	<p>Biodiversity of the site will be protected, diversified and improved through new hedgerow and tree planting and delivery of new garden spaces, as well as formal and informal green spaces such as Orchards and SuDS basins. Overall, the proposal will achieve a net gain in biodiversity.</p> <p>A scheme of green infrastructure as well as completed ecological surveys allows the site to still accommodate nature.</p>
<p>Highways</p> <ul style="list-style-type: none"> • Need to provide footpaths and cycleways • Inadequate highway system for more housing • Town centre gridlocked every day • Would endanger young people who walk this way to school • New builds have caused queues 	<p>A Transport Assessment, and Transport Plan have been completed by Ashley Helme Associates and will be submitted as part of this application to demonstrate the ability of the road network to accommodate any additional traffic, as well as explaining any mitigation proposed to make this possible.</p>

	<p>The footpath on the northern side of Swanstree Avenue will remain in use for pedestrians to use during construction, if it is disrupted for any reason, appropriate signage and safety barriers will be employed.</p> <p>New footways along the site access will be introduced, a connection between the site access and the wider network will be provided. There is a shared footway/cycleway on the north side of Swanstree Avenue.</p> <p>The Transport Assessment has completed comprehensive junction analysis and modelling for the AM & PM peak hour traffic including new development proposals within the vicinity of the site, and has concluded that the proposed residential development does not have a detrimental impact on the operational performance of the TA highway network.</p> <p>The Transport Plan would ensure that new residents are able to make educated decisions on sustainable transport in the area including cycle path accessibility, bus timetables etc. providing opportunity for more sustainable forms of travel.</p>
<p>Noise/Pollution</p> <ul style="list-style-type: none"> • Developers build estates which increase pollution that they are trying to cut down on • Will increase noise and vibration 	<p>An Air Quality Assessment submitted with the application completed by Wardell Armstrong LLP demonstrates that the proposed development will not lead to an unacceptable risk from air pollution, neither will it lead to any breach of national objectives as required by national policy. The assessment considers dust and fine particulate matter emissions during the construction phase</p>

	<p>and road traffic emissions during the operational phase. Consideration has also been given to the potential impact of vehicle emissions on future residents of the proposed development site.</p> <p>Any noise and vibration created as a result of construction will be managed by a Construction Management Plan to be approved by the council, and will include mitigation to reduce nuisance to residents through restricted working/ delivery times, and other measures.</p>
<p>Facilities/Services</p> <ul style="list-style-type: none"> • Access to public open space important • Need to provide space for older children/teenagers • Infrastructure is not good enough to cope with new development • GP services are in crisis • Schools are oversubscribed • Services are not supported by the development • Needs to provide play areas and community facilities 	<p>Publicly accessible open space including a Locally Equipped Area of Play (LEAP) will be provided onsite which will be available to new and existing residents.</p> <p>Through consultation with the Local Authority financial contributions towards enhancing local services including schools, health services, roads and community clubs will be discussed and agreed with the relevant bodies.</p>
<p>Flooding/Drainage</p> <ul style="list-style-type: none"> • Flooding along Swanstree Avenue will affect us all 	<p>The application site falls within the EA Flood Risk Zone 1 (land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding).</p> <p>The submitted drainage strategy and flood risk assessment demonstrates that flood risk is minimal and can be mitigated against through sustainable urban drainage systems.</p>
<p>Design</p> <ul style="list-style-type: none"> • The scheme will be of poor design 	<p>The design of the scheme has been subject to extensive research as detailed in the Design and Access Statement (DAS) and would be reflective of</p>

	<p>the surrounding character of the area. The National Planning Policy Framework requires that schemes have a focus on beauty and design, as this is an outline application detailed information on design will be advanced through later Reserved Matters applications.</p>
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4 POTENTIAL FOR COMMUNITY BENEFITS

- 4.1.1 Throughout the consultation process, Gladman encouraged suggestions as to how the local community could benefit from the proposed development.
- 4.1.2 Significant community benefits will be provided, including services in a new local centre, affordable housing, landscaping, public footpath improvements and ecological enhancements.
- 4.1.3 Potential suggestions for community benefits must be tested against Government rules which limit what those seeking planning permission can offer (which exist to ensure development cannot 'buy' consents). However, the applicant will discuss the ideas put forward by residents and the Town Council throughout the planning process.
- 4.1.4 Implementation of the agreed community benefits will be guaranteed through their inclusion within a Section 106 Agreement / or a Unilateral Undertaking.

5 SUMMARY

- 5.1.1 Gladman have consulted the local community of Sittingbourne prior to the application being submitted. It is considered that the scope of the community consultation has met with, and gone beyond, the recommendations of Local and National planning policies and legislation.
- 5.1.2 Gladman have taken true accountability of the views expressed by those who were consulted and has engaged with the local community in a variety of different ways to ensure that their opinions have been considered within the evolution of the scheme put forward within this application.

- 5.1.3 This SCI provides a response to the key matters that have been raised. Most of the comments made relate to traffic matters, the need for housing and the capacity of local services that have already been considered.

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Appendix A - Leaflet

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Appendix B – Website Boards

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Appendix C – Consultation Responses

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